PACIFIC GAS AND ELECTRIC COMPANY
10 Year Electrical Undergrounding Plan (EUP)
Data Response

PG&E Data Request No.:	OEIS_003-Q006
PG&E File Name:	EUP-PhI_DR_OEIS_003-Q006
Request Date:	October 23, 2026
Requester DR No.:	Energy Safety-DR-EUP-26-08
Requesting Party:	Office of Energy Infrastructure Safety
Requester:	David Rey
Date Sent:	October 28, 2026
Responsible Person(s):	Justin Sadler

SUBJECT: ALTERNATIVE MITIGATIONS AND PORTFOLIO PROJECT SELECTION

Project-Level Standards for Confirmed Projects

QUESTION 006

In Table 12, 12 of the 28 Confirmed Projects do not meet the Project-Level Standard for Project as Scoped. For each Confirmed Project that does not meet its applicable Project-Level Standard:

a. Identify the Project ID, applicable eligibility threshold and Project-Level Standard, the modeled post-mitigation values, and the extent to which the standard is not met.
b. Provide the specific project-level justification for including the project as a Confirmed Project.
c. Identify the location in the narrative or other submitted material where this justification is provided or indicate that it has not been documented on a project-specific basis.

ANSWER 006

Under the EUP Guidelines, not every Undergrounding Project in the Portfolio needs to meet the Project-Level Standards. Any Confirmed Project that does not must be further justified in the narrative submission in Table C.12 (EUP Guidelines § 2.7.9.2; EUP Vol. 1, Ch. 7, p. 358). PG&E provides that justification in the "additional justification" field of Table C.12.

In developing Portfolio 0, PG&E selected projects consistent with the applicable Portfolio 0 requirements established in Section 2.4.5.2 of the EUP Guidelines and, where applicable, the EUP Project Acceptance Framework. The EUP Guidelines include specific Portfolio 0 requirements that may result in the inclusion of projects that do not otherwise advance through the Project Acceptance Framework. PG&E also considered the applicable Portfolio 0 requirements, Screen 2 analytical results, available project-specific information, project development maturity and readiness, and the

expected ability of projects to continue advancing through the Project Acceptance Framework.

a. Please refer to the attachment "*EUP-PhI_DR_OEIS_003-Q006Atch01.xlsx*" sheet "OEIS003-Q006a". Column A shows the Project IDs and Column I identifies the applicable eligibility threshold. The Project-Level Standards are provided in Columns AF, AL, and AR. Columns AH, AN, and AT indicate whether High Risk, Ignition Tail Risk, and High Frequency Outage Program Project-Level Standards, respectively, are met based on the corresponding project level post-mitigation risk, ignition, and frequency reductions. The extent to which an applicable standard is not met can be determined by comparing the applicable Project-Level Standard with the corresponding post-mitigation reduction. For example, column AF provides the High-Risk Project-Level Standard, and Column AG provides the modeled risk reduction per mile. Column G shows whether the project meets any applicable Project-Level Standard.

b. The inclusion of each of the 12 Confirmed Projects identified in part (a) is supported by its selection consistent with the applicable Portfolio 0 requirements and, where applicable, the EUP Project Acceptance Framework. The applicable selection considerations included the Portfolio 0 requirements, Screen 2 analytical results, available project-specific information, project development maturity and readiness, and the expected ability of projects to continue advancing through the Project Acceptance Framework.

   For each of the 12 Confirmed Projects, Table C.12 provides a specific justification in the "Additional Justification" field. Table C.12 identifies Benefit Cost Ratio constraints as the reason the applicable Project-Level Standard was not met. Additional project-specific information is provided in Attachment "*EUP-PhI_DR_OEIS_003-Q006Atch01.xlsx*," including the extent of undergrounding and, where applicable, Portfolio 0 requirements or other project-specific considerations.

   For the 12 projects that are eligible but do not meet the applicable Project-Level Standard, Column H provides the fraction of overhead miles removed through undergrounding, based on the miles undergrounded in Column BE relative to the eligible miles for undergrounding in Column J. Across these projects, the fraction of eligible miles undergrounded is less than 100 percent. Projects with less than 100 percent of eligible miles undergrounded achieve correspondingly lower risk-reduction benefits, which may limit their ability to meet the applicable Project-Level Standard.

   Additionally:

   - Proj00013 does not meet the applicable Project-Level Standard because it does not include PSPS benefits after scoping.
   - Proj00008 and Proj00021 are included to satisfy the Portfolio 0 requirements in the EUP Guidelines, section 2.4.5.2, to include two projects based on Ignition Tail Risk Threshold eligibility.
   - Proj00028 and Proj00027 are included to satisfy the Portfolio 0 requirement to include two projects based on High Frequency Outage Program Threshold eligibility.

c. For each of the 12 Confirmed Projects identified in part (a), the project-specific justification is provided in the "Additional Justification" field of Table C.12. Additional project-specific information supporting the justifications is provided in PG&E's response to part (b) above and in Attachment "*EUP-PhI_DR_OEIS_003-Q006Atch01.xlsx*," sheet "OEIS003-Q006a."