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

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Requesting Party:	Office of Energy Infrastructure Safety
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SUBJECT: ALTERNATIVE MITIGATIONS AND PORTFOLIO PROJECT SELECTION

Selection of Confirmed Projects and the 28 Portfolio O Projects

QUESTION 007

1. Describe and document how PG&E selected the initial 28 Confirmed Projects from the broader list of Eligible Circuit Segments:
   a. Identify the candidate population at each decision point, including the screening, ranking, feasibility, scheduling, and other criteria used to select the 28 projects.
   b. For each Confirmed Project, identify whether it was in an existing GRC/WMP undergrounding workplan, had completed any scoping, or otherwise entered project development before application of the proposed EUP Project Acceptance Framework. Provide the relevant dates or stage of development.
   c. Identify any higher-ranked eligible Circuit Segments or Undergrounding Projects, under the ranking measures used by PG&E, that were not included in Portfolio 0 and describe the principal reasons for exclusion or deferral.
   d. Explain how Portfolio 0 demonstrates the proposed Project Acceptance Framework, distinguishing the selection of previously scoped projects from projects selected entirely through the proposed EUP process.
2. Describe the process PG&E will use to advance Eligible Circuit Segments through the Project Acceptance Framework to become Confirmed projects during the remainder of the EUP. Include the KDMMs and other criteria that will be used to prioritize which Circuit Segments advance first.

ANSWER 007

1. PG&E began with the population of Circuit Segments that satisfied Screen 1 eligibility requirements. PG&E then reviewed that population to identify candidate projects capable of collectively satisfying the Portfolio 0 requirements established in the EUP Guidelines. PG&E also considered Screen 2 analytical results and available project-specific information as part of developing Portfolio 0. Screen 2 provides a standardized, planning-level comparison and does not itself determine which Eligible Circuit Segments advance or the project-specific mitigation ultimately selected. The objective was to develop an initial portfolio that both satisfied the required representation of project types and risk thresholds and consisted of projects reasonably expected to progress through the Project Acceptance Framework.
    a. The candidate population was progressively narrowed through the Project Acceptance Framework.

Screen 1 - Eligibility Screening

- Candidate Population: 2,946, All evaluated Circuit Segments.
- Criteria Applied:
    - Eligibility requirements described in the EUP.
    - Identification of Circuit Segments that satisfied the applicable wildfire risk and program eligibility criteria.
- Output:
    - Eligible Circuit Segments.

Screen 2 - Mitigation Comparison and Economic Evaluation

- Candidate Population: 1,054[1]
    - Eligible Circuit Segments from Screen 1.
- Criteria Applied:
    - Comparison of undergrounding to alternative mitigation options.
    - Benefit-cost analysis.
    - Evaluation of project-level performance metrics and risk reduction potential.
- Output:
    - Standardized planning-level analytical results comparing undergrounding and the Screen 2 alternative mitigation design variations, including their modeled BCRs.

[1] An additional analysis was performed to support the EUP Phase 1 Plan to identify projects that would satisfy the 25-project requirement and whose undergrounding results were expected to support continued advancement through the Project Acceptance Framework under the range of benefit-cost methodologies under consideration in A.26-02-005 at the time of filing.

Screen 3 - Feasibility and Project Development

- Candidate Population: 36
    - Eligible Circuit Segments entering project-specific scoping and feasibility review.
- Criteria Applied:
    - Engineering feasibility.
    - Constructability considerations.
    - Permitting requirements.
    - Environmental and land rights considerations.
    - Scope development activities.
    - Project scheduling and execution readiness.
- Output:
    - Projects that could reasonably advance toward confirmation.

Portfolio 0 Selection

- Candidate Population: 28
    - Screen 3 projects and projects already progressing through planning or scoping activities during the transition period.
- Criteria Applied:
    - Satisfaction of EUP Guidelines Portfolio 0 requirements.
    - Representation of required project types and thresholds.
    - Screen 2 analytical results.
    - Project development maturity and readiness.
    - Expected ability to continue advancing through the Project Acceptance Framework.
- Output:
    - The initial 28 Confirmed Projects comprising Portfolio 0.

b. Of the initial 28 Confirmed Projects, ten (10) projects were included in PG&E's forecasted undergrounding workplans supporting the 2026-2028 WMP and 2027-2030 GRC. While these projects had been identified for planning purposes, they had not been previously scoped or evaluated using the WMP, nor GRC project Acceptance Frameworks. All ten projects, along with 17 Confirmed Projects, were subsequently evaluated and scoped under the EUP Project Acceptance Framework and advanced through the EUP screening process before being designated as Confirmed Projects.

Please see the Q7.1.b tab on the "*EUP-PhI_DR_OEIS_003-Q007Atch01.xlsx*" and reference Column E "In GRC/WMP UG Workplan?". Please see Exhibit (PG&E-16), Chapter 7, Attachment B: PG&E's 2023-2027 System Hardening Workplan for the workplan PG&E submitted as part of the 2027 GRC.

c. PG&E 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 where undergrounding remained the preferred mitigation alternative. In developing Portfolio 0, PG&E selected projects with sufficiently favorable undergrounding BCR results to provide greater confidence that they could continue to advance under the benefit-cost methodologies under consideration in A.26-02-005 at the time of filing. Accordingly, some eligible Circuit Segments may not have been included in Portfolio 0 despite having a higher risk rank because the available information, project development status, or other Project Acceptance Framework considerations did not support advancement at that time. This approach helps limit potential project scoping rework and supports efficient progression through the Project Acceptance Framework.

   Please see "*EUP-PhI_DR_OEIS_003-Q007Atch01.xlsx*," which includes the Circuit Segments that were not included in Portfolio 0 despite having a higher risk rank than segments that were included. In the attachment:

   - Column B provides the risk rank
   - Column K indicates whether the segment was included in Portfolio 0

d. Portfolio 0 reflects application of the EUP analytical framework during a transition period and includes both projects that had already entered planning, scoping, or development under existing undergrounding programs and projects evaluated through the EUP process.

   Portfolio 0 includes projects that entered the framework through two primary pathways:

   i. **Previously Scoped or Planned Projects**

      Some projects had already entered planning, scoping, or development activities under existing undergrounding programs before implementation of the proposed EUP framework. For these projects, the EUP analyses were applied to evaluate eligibility, mitigation comparisons, project-level performance metrics, and consistency with Portfolio 0 requirements.

   ii. **Projects Evaluated Through the EUP Process**

      Other projects were evaluated using the framework beginning with the eligible Circuit Segment population and advancing through the applicable screening and evaluation steps.

   These projects demonstrate how the framework can be applied prospectively to identify and prioritize candidate undergrounding projects.

As a result, Portfolio 0 demonstrates application of the EUP analytical framework and portfolio development process during the transition period while reflecting a mix of project maturity levels that existed when the framework was introduced.

2. During the remainder of the EUP, PG&E will advance Eligible Circuit Segments through the Project Acceptance Framework using the sequential screening, evaluation, and prioritization process described in Chapter 3. The process consists of:

Step 1 - Screen 1 Eligibility Evaluation

Circuit Segments will be evaluated against the Screen 1 eligibility requirements to determine whether further consideration under the EUP is warranted.

Step 2 - Screen 2 Mitigation Comparison and Project Evaluation

Eligible Circuit Segments will undergo the standardized comparison of undergrounding and alternative mitigation design variations, including calculation of modeled BCRs. These results provide planning-level comparative information and do not themselves determine the project-level specific mitigation ultimately selected. PG&E will compare undergrounding against alternative wildfire mitigation strategies to provide a standardized, planning-level comparison of modeled value and risk reduction.

Step 3 - Screen 3 Feasibility and Project Development

Eligible Circuit Segments entering project-specific scoping and feasibility review will undergo additional project development activities, including:

- Engineering assessment
- Scope development
- Feasibility evaluation
- Constructability review
- Permitting review
- Environmental review
- Land rights assessment

Step 4 – Screen 4 Prioritization

Projects that successfully complete project development activities will be prioritized for advancement based on the framework's project and portfolio evaluation criteria. These include:

- Overall Utility Risk reduction – which is an aggregation of project-level KDMMs, as described in PG&E’s EUP Chapter 7, Section E, as the top-level metrics used to evaluate the efficacy of an Undergrounding Project.
- Project feasibility and constructability.
- Schedule readiness and ability to advance.

- Fire Rebuild Program considerations, where applicable.
- Bundling opportunities and portfolio optimization considerations.
- Other portfolio-level considerations identified in the EUP.

Projects that successfully advance through these evaluations and satisfy applicable portfolio requirements will be designated as Confirmed Projects and incorporated into the EUP.