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

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SUBJECT: ALTERNATIVE MITIGATIONS AND PORTFOLIO PROJECT SELECTION

Feasibility and Decision Value of 100% Remote Grid as Screen 2 Alternative Mitigation 2

QUESTION 003

Explain the role of 100% Remote Grid with line removal (100% RG) as Screen 2 Alternative Mitigation 2 (Alt 2):

a. Identify whether Screen 2 identified any Eligible Circuit Segments for which 100% Remote Grid has a higher modeled benefit-cost ratio (BCR) than both 100% undergrounding and Screen 2 Alternative Mitigation 1, and which appear, based on currently available information, to be reasonable candidates for further Remote Grid scoping.
    i. In making this preliminary assessment, consider factors such as circuit topology and configuration, customer count, circuit segment location, service continuity needs, and other relevant technical or operational constraints.
    ii. For each such segment, provide its Circuit Segment ID, the BCRs for the three Screen 2 design variations, and a brief explanation of the factors supporting its potential suitability for further evaluation, including any significant known constraints.
b. Describe what segment-level feasibility screening is performed between Screen 2 and Screen 3 for potential 100% Remote Grid projects including customer count, load, system configuration, land constraints, reliability requirements, and any other material limitations.
c. Explain how results from the 100% Remote Grid comparison inform Screen 2 screening or project progression and later Screen 3 mitigation selection, given that partial Remote Grid opportunities may be identified through separate project-level reviews.

ANSWER 003

The 100% Remote Grid design variation provides a standardized, planning-level comparison of a distinct permanent mitigation strategy using common assumptions across Eligible Circuit Segments (Table 3-9). As with the other Screen 2 design variations, the 100% Remote Grid comparison is a preliminary comparison and does not establish that Remote Grid is technically feasible or preferred for implementation across the entirety of a Circuit Segment. Project-specific Remote Grid configuration and feasibility are evaluated at Screen 3 as more detailed scoping and technical information become available.

a. Screen 2 identified 36 Eligible Circuit Segments for which the modeled benefit-cost ratio (BCR) for 100% Remote Grid was higher than the modeled BCRs for both 100% undergrounding and Screen 2 Alternative Mitigation 1 (Overhead Hardening). These 36 Eligible Circuit Segments and their respective Screen 2 BCRs for 100% Undergrounding, Alternative Mitigation 1, and Alternative Mitigation 2 (100% Remote Grid) are provided in Attachment "EUP-PhI_DR_OEIS-003-Q003Atch01.xlsx." The underlying Screen 2 BCRs for the three design variations (100% UG, Alt 1 and Alt 2) are also provided by Eligible Circuit Segment in Table C.11 (Attachment A-2) to the EUP.

   However, PG&E has not determined that these 36 Eligible Circuit Segments are reasonable candidates for further Remote Grid scoping. Screen 2 applies standardized assumptions and does not include the project-specific information necessary to make that determination. A higher modeled BCR for 100% Remote Grid is an analytical result from the Screen 2 comparison, not a determination of Remote Grid feasibility or suitability.

   i. The factors identified in the question, including circuit topology and configuration, customer count, Circuit Segment location, service continuity needs, and other technical or operational constraints, are evaluated through project-specific scoping and feasibility review at Screen 3 rather than as part of the standardized Screen 2 analysis. Accordingly, PG&E did not use those factors at Screen 2 to determine which of the 36 Circuit Segments are reasonable candidates for further Remote Grid scoping.

   ii. The 36 Eligible Circuit Segments meeting the BCR comparison described above, together with the requested BCRs for 100% Undergrounding, Alternative Mitigation 1, and Alternative Mitigation 2 (100% Remote Grid), are provided in Attachment "EUP-PhI_DR_OEIS_003-Q003Atch01.xlsx." These BCRs are also provided by Eligible Circuit Segment in Table C.11 of Attachment A-2 of the EUP. PG&E does not have, from the Screen 2 analysis, the requested segment-specific explanations of potential suitability or significant known constraints because the project-specific information necessary to assess those considerations is developed and evaluated at Screen 3. These 36 Eligible Circuit Segments have not yet undergone the Screen 3 project-specific review described above; that review will occur as the applicable projects enter Screen 3 of the Project Acceptance Framework.

b. Remote Grid feasibility is evaluated at Screen 3 rather than through a separate feasibility-screening step between Screens 2 and 3. As part of the Screen 3 Alternative Mitigation review, PG&E identifies potential Remote Grid locations and evaluates portions of a Circuit Segment that are end of line, relatively long, and

serve relatively few customers. PG&E then performs a desktop review of site-specific features that may make Remote Grid infeasible and develops an expected cost (pp. 140–141). Remote Grid feasibility considerations include customer willingness, site availability, land rights, environmental and permitting requirements, and engineering feasibility (Table 3-9, note (b)). The EUP does not establish numeric thresholds for these considerations; they are evaluated through the project-specific desktop review and scoping.

c. The Screen 2 100% Remote Grid comparison provides a standardized, planning-level analytical result. It does not determine whether a Circuit Segment progresses, whether Remote Grid is feasible, or which mitigation ultimately will be selected. Consistent with the Screen 2 framework described in PG&E's responses to Questions 001 and 002, project-specific mitigation configurations and feasibility are evaluated at Screen 3 when more detailed topology, scoping, engineering, cost, and site information is available.

   At Screen 3, PG&E may evaluate Remote Grid as part of the Screen 3 Alternative Mitigation, Additional Comparison 2, or Additional Comparison 3, where feasible. These Screen 3 reviews may identify partial Remote Grid opportunities, including Remote Grid applied to a smaller portion of a project together with undergrounding, overhead hardening, or other feasible project-specific configurations. Thus, a favorable Screen 2 100% Remote Grid BCR provides comparative planning-level information, but project-specific Remote Grid feasibility, configuration, and mitigation selection are evaluated at Screen 3.