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

PG&E Data Request No.:	OEIS_002-Q005
PG&E File Name:	EUP-PhI_DR_OEIS_002-Q005
Request Date:	October 21, 2026
Requester DR No.:	Energy Safety-DR-EUP-26-07
Requesting Party:	Office of Energy Infrastructure Safety
Requester:	David Rey
Date Sent:	October 28, 2026
Responsible Person(s):	Justin Sadler

SUBJECT: WILDFIRE REBUILD AREAS & REBUILD PROJECT SELECTION

QUESTION 005

Fire Rebuild Project Risk Baselines

a. On p. 53, PG&E states: "Circuit Segments entirely outside HFTD/HFRA are excluded from the Plan Mitigation Objective."
    i. State whether PG&E would underground eligible, Non-HFTD Rebuild Projects through the EUP Program (Yes/No)
        i. If yes, state if the risk reduction achieved by undergrounding eligible, Non-HFTD Rebuild Projects would count toward the Plan Mitigation Objective (Yes/No).
        ii. If yes, state whether the miles achieved by undergrounding eligible, Non-HFTD Rebuild Projects would count toward PG&E's 4,000 undergrounding mile target (Yes/No).

b. On p.355 of PG&E's EUP, PG&E states that the "Pre-Wildfire distribution infrastructure for Fire Rebuild Projects where the fire occurred before January 1, 2023, would not be available for baseline comparisons. See discussion of previously-scoped projects in Chapter 3, Section D.S."
    i. Explain why PG&E is unable to provide this information.
    ii. State whether PG&E is proposing to incorporate Fire Rebuild Projects associated with wildfire events prior to 2023 into the EUP portfolio, even if those Fire Rebuild Projects do not meet all EUP requirements (Yes/No).
        i. If yes, explain the basis for including these projects despite not meeting the EUP all requirements.

ANSWER 005

a. No. Under Figure 3-2, a non-HFTD project would not qualify for consideration as a Fire Rebuild Project using undergrounding as the selected mitigation strategy.

i. Not applicable
ii. Not applicable

b.

i. PG&E is unable to provide pre-wildfire baseline comparisons for Fire Rebuild Projects associated with wildfire events occurring before January 1, 2023 because the EUP risk baseline is derived from the WDRM V4 circuit geometries and associated risk framework established as of January 1, 2023. Comparable pre-wildfire baseline information consistent with the EUP methodology is therefore unavailable for wildfire events that occurred before that date. Reconstructing equivalent baseline risk values would require recreating historical circuit geometries and risk model inputs that predate establishment of the EUP baseline framework.
ii. No. PG&E is not proposing to include Fire Rebuild Projects associated with wildfire events occurring prior to January 1, 2023 in the EUP portfolio. The discussion regarding projects associated with wildfire events occurring before January 1, 2023 addresses the availability of pre-wildfire baseline comparisons and does not establish inclusion of those projects in the EUP portfolio.