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

PG&E Data Request No.:	OEIS_002-Q001
PG&E File Name:	EUP-PhI_DR_OEIS_002-Q001
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):	Nick Noyer

SUBJECT: WILDFIRE REBUILD AREAS & REBUILD PROJECT SELECTION

QUESTION 001

Fire Rebuild Areas

a. PG&E defines a "Fire Rebuild Area" as "four or more spans of electric distribution infrastructure damaged by a fire" (PG&E EUP, p. 98). Table 24 from PG&E's Tabular Data submission, however, identifies "Wildfire Rebuild Areas" by fire event which can consist of multiple impacted circuit segments.
   i. State whether a "Fire Rebuild Area is (i) a single circuit segment, (ii) a fire event that may include multiple circuit segments, or (iii) something else.
   ii. Provide PG&E's definition of a "Fire Rebuild Area" and cite any documentation that establishes it.

b. Regarding the types of fires that qualify:
   i. Explain why PG&E uses "Fire" rather than "Wildfire" when referring to rebuild areas and projects.
   ii. State whether "Fire Rebuild Areas" and "Fire Rebuild Projects" include line damage caused by fires other than wildfires (e.g., structure or vehicle fires) (Yes/No).
      i. If yes, identify each Table 24 entry caused by a non-wildfire fire and the fire type.
      ii. If yes, explain the basis for including non-wildfire fires as eligible rebuild areas under the EUP.

c. Regarding Table 24 of PG&E's Tabular Data submission:
      i. State whether the fire events provided in Column A of this table, are PG&E's "Fire Rebuild Areas" (Yes/No). If no, identify the field that identifies "Fire Rebuild Areas."
      ii. For the data in Table 24, provide: (i) each system of record used; (ii) the validation steps performed; and (iii) how often data is updated.

iii. Identify each government agency to which PG&E reports the fire-event or "Fire Rebuild Area" information in Table 24. For each agency, provide the agency/program receiving the information and the reporting mechanism (dataset, filing, incident report, or other). If none, state so.

iv. For the data in Table 24, please identify fire events that occurred outside State Responsibility Areas where CalFire is the primary emergency response agency. For these entries, please identify which emergency response agency was the primary emergency response agency for the fire event.

v. Several Table 24 entries do not provide an ignition date or fire location. For each such entry, provide: (i) ignition date; (ii) location; (iii) fire cause; (iv) whether the fire was a wildfire (Yes/No); (v) HFTD/HFRA status; and (vi) supporting documentation (e.g. CAL FIRE or local fire agency incident report). If this information is not available, provide a justification on why.

vi. For fire events where "Fire Location" is provided as latitude and longitude, do the coordinates represent the point of ignition, a random spot within the fire perimeter, or something else?

vii. Please explain how PG&E determines which latitude and longitude coordinates to use to identify the location of Fire Events.

ANSWER 001

Fire Rebuild Areas

a.

i. The Fire Rebuild area definition applies to a single circuit segment.

ii. As noted in the question, PG&E defines “Fire Rebuild Area” as “An area with four or more spans of electric distribution infrastructure damaged by fire that requires the electrical distribution facilities to be reconstructed or repaired.” (EUP, Vol. 2, p. 1178.) This definition is consistent with Energy Safety’s definition of “Wildfire Rebuild Area” on page A-7 of the Guidelines and PG&E’s approved 2026-2028 Wildfire Mitigation Plan which states that “System hardening is deployed where significant rebuild is required (e.g. four or more spans and/or segments with intermittent damage) and other repairs will not suffice.” (PG&E 2026-2028 WMP, p. 190.)

b.

i. PG&E does not distinguish between wildfire events and other fire events in the context of rebuilding infrastructure damaged by fire. PG&E uses Fire Rebuild Areas rather than Wildfire Rebuild Areas for consistency with its 2026-2028 Wildfire Mitigation Plan.

ii. PG&E does not distinguish between wildfire events and other fire events in the context of rebuilding infrastructure damaged by fire, because both result in the same outcome: repairs to the damaged distribution infrastructure. Accordingly, PG&E’s undergrounding tracking and GIS system do not distinguish between causes of fire events in its service territory for purpose of

this rebuild work or for providing a wildfire/non-wildfire distinction. in Table 24. PG&E describes the process for defining a Circuit Segment as a Fire Rebuild Project in Chapter 3, Section D.1.a.

c.

i. No. The Fire Event Name in Table 24 Column A describes a fire incident which is associated with electric distribution infrastructure damage. The Fire Rebuild Areas for each Fire Event Name are listed in the Affected Circuit Segments field, and in the rebuild_area column in Table 6.

ii. The process used to define Fire Rebuild Areas is described in Chapter 3, Section D.1.a. The systems of record used to identify Affected Circuit Segments and Facilities Impacted are one or more of the following:

   a. A Fire Rebuild Project scoped on the Circuit Segment using the damage assessment process described in Chapter 3, Section D.1.a (pp. 98-100).

   b. The presence of Electric Corrective (EC) 22 tags from fires spanning 2015 to 2025 on the Circuit Segment.

   Fire Event Names are derived from the Fire Rebuild Project description in the System Hardening Workplan, or by matching a Fire Event Name referenced in the EC Tag historical dataset to a historical CAL FIRE incident using information published by CAL FIRE at https://www.fire.ca.gov/incidents. Fires resulting in the creation of a Fire Rebuild Project or an EC Tag may occur at any time. New Fire Events will be added to Table 24 any time the data is refreshed, specifically prior to the creation of an EUP Progress Report.

iii. PG&E does not report the data in Table 24 to any agency other than the Office of Energy and Infrastructure Safety. Table 24 was created solely to comply with the requirements in the Section 2.4.3.1 of the EUP Guidelines.

iv. PG&E does not specifically record whether fire events take place within or without State Responsibility Areas within the systems of record used to produce Table 24, and cannot provide this information for the Circuit Segment or Fire Event Name.

v. PG&E derives the Ignition Date and Fire Location data from historical CAL FIRE data published at https://www.fire.ca.gov/incidents. PG&E may not be able to associate historical fire damage on its electric distribution infrastructure with a CAL FIRE event, resulting in the 'Unknown' data shown in these fields in Table 24. PG&E only records fire damage on its infrastructure and therefore cannot independently provide the requested data for all Fire Events.

vi. The coordinates in the Fire Location field are derived from historical CAL FIRE data published at https://www.fire.ca.gov/incidents. PG&E has not confirmed what the coordinates provided by Cal FIRE represent for each fire.

vii. See answer to b.vi.