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

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Requesting Party:	Office of Energy Infrastructure Safety
Requester:	David Rey
Date Sent:	October 28, 2026
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SUBJECT: WILDFIRE REBUILD AREAS & REBUILD PROJECT SELECTION

QUESTION 003

Emergency Damage and Customer Service Assessment

a. Provide PG&E's definitions of a "span" and a "segment" as used in the Emergency Damage and Customer Service Assessment (PG&E EUP Figure 3-2).

b. Provide PG&E's definition of "intermittent damage" as used in the Emergency Damage and Customer Service Assessment (PG&E EUP Figure 3-2).

c. Regarding intermittent damage:

   i. Describe the process by which intermittent damage is identified, documented, and reviewed.

   ii. Provide PG&E's procedure for determining whether damage is classified as intermittent.

   iii. Provide PG&E's procedure for calculating whether the intermittent damage exceeds 50%.

d. On p. 99 of PG&E's EUP, PG&E states that a: "Circuit Segment is only prioritized as a Fire Rebuild Project if it is reviewed according to the [Emergency Damage and Customer Service Assessment] damage assessment process described in this paragraph and in Figure 3-2 below."

   i. At what point in the assessment does circuit segment get designated a Fire Rebuild project: (i) whenever a circuit segment is reviewed, regardless of the assessment's outcome, (ii) if the circuit segment has 4 or more damaged spans or 50% intermittent damage, or (iii) something else.

ANSWER 003

a. A "span" in this context refers to the overhead primary conductor extending between two poles. A "segment" refers to a section of distribution line identified for assessment and potential mitigation evaluation following a wildfire event.

b. PG&E does not maintain a separate glossary definition for "intermittent damage" within the EUP. For purposes of the Emergency Damage and Customer Service Assessment, intermittent damage refers to wildfire damage that is distributed throughout an assessed segment rather than concentrated within a single contiguous portion of the segment. Figure 3-2 evaluates whether the proportion of damaged facilities within the assessed segment exceeds the applicable threshold used to determine whether additional mitigation evaluation is warranted.

c.

   i. During a wildfire event, PG&E identifies the fire boundary and assesses all poles located within that boundary. Damage information is documented during the assessment process and affected facilities are organized into segments for evaluation. Segments are assigned unique identifiers and structured to support evaluation of hardening opportunities, construction planning, resource deployment, and documentation of work. Following assessment, PG&E reviews the documented damage within the identified segments to determine the extent and distribution of damage and evaluates the segment in accordance with the Emergency Damage and Customer Service Assessment process shown in Figure 3-2.

   ii. PG&E determines whether damage is intermittent by evaluating the distribution of damaged structures throughout the assessed segment. Damage that is distributed throughout the segment rather than concentrated within a localized portion of the segment is evaluated under the intermittent-damage pathway identified in Figure 3-2.

   iii. PG&E calculates the intermittent damage percentage by dividing the number of damaged structures within the assessed segment by the total number of structures within that segment. The resulting percentage is then compared to the threshold identified in Figure 3-2 to determine whether the segment proceeds to mitigation evaluation.

d. A circuit segment is not designated as a Fire Rebuild Project merely because it has been reviewed through the Emergency Damage and Customer Service Assessment process, nor is designation automatic upon meeting the damage thresholds identified in Figure 3-2. A segment is identified as a Fire Rebuild Project only after:

   1. The segment has been evaluated under the Emergency Damage and Customer Service Assessment process;
   2. The applicable damage criteria in Figure 3-2 have been met;
   3. Restoration and mitigation alternatives have been evaluated; and
   4. Undergrounding is selected as the preferred mitigation strategy for the affected segment.

   Accordingly, the correct characterization is (iii) something else.

   If repair, overhead hardening, remote grid, or another mitigation alternative is selected, the segment would not be identified as a Fire Rebuild Project for EUP reporting purposes.