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

PG&E Data Request No.:	OEIS_004-Q005
PG&E File Name:	EUP-PhI_DR_OEIS_004-Q005
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Requester DR No.:	Energy Safety-DR-EUP-26-09
Requesting Party:	Office of Energy Infrastructure Safety
Requester:	Adam Berlinerman
Date Sent:	October 29, 2026
Responsible Person(s):	Justin Sadler

SUBJECT: CPUC DATA TEMPLATE, PRESENT VALUE CALCULATION, SCREEN 2 BCR INPUTS, RISK MODELING

QUESTION 005

Project Selection

a. Explain PG&E's rationale for sorting by WF Risk Rank when creating the Screen 2 Proposed Project List.

b. The Plan Tracking Objectives list 93 projects that have passed Screen 3 and 4 in Year 1. Will all these projects be selected using the criteria described in the Project Prioritization and Decision Tree, or were some projects scoped/selected through a different process?

c. PG&E's Additional Comparison 2 includes areas of impact that include Tree Strike Risk Criteria, Ingress/Egress Risk, and PSPS Risk.

   i. Describe the criteria and method used to determine these areas of impact. Include any SME input.

ANSWER 005

a. As described in Chapter 2, Section D and Chapter 3, Section D.2 of the EUP, PG&E creates the Screen 2 Proposed Project List by sorting Eligible Circuit Segments from highest to lowest Wildfire Risk Rank before applying the BCR Alternative Mitigation Comparison. Wildfire risk per mile of overhead removed (WF Risk Rank) is used for this step because the primary objective of undergrounding under PG&E's EUP is to protect public safety by reducing the risk of catastrophic utility-caused wildfires. Unlike EPSS and PSPS risk, wildfire risk directly reflects public safety impacts, therefore ranking circuit segments by wildfire risk per mile targets the largest public safety risk reductions. Accordingly, higher-ranked projects are evaluated through Screen 3 first, giving priority consideration to projects that address the greatest wildfire safety risk. Other considerations, including reliability and non-wildfire public-safety benefits, are evaluated through subsequent screening, prioritization, and project-selection criteria, as applicable.

b. Yes. Projects reflected as completing Screens 3 and 4 in the Plan Tracking Objectives are expected to proceed through the Project Prioritization Decision Tree and the Project Selection Framework. In addition, certain projects may be selected to satisfy the prescriptive Portfolio 0 requirements established by the EUP Guidelines.

   The 93 projects identified for 2028 in the Plan Tracking Objectives represent a forward-looking estimate of the number of projects expected to complete Screens 3 and 4, rather than a fixed set of 93 projects that have already been scoped and selected. The actual number and composition of projects completing Screens 3 and 4 may change as project scoping progresses and projects proceed through the EUP screening and selection process.

c. We evaluate Tree Strike Risk, Ingress/Egress Risk, and PSPS Risk in Screen 3, as part of Additional Comparison 2 (AC 2). As shown in the Project Prioritization and Decision Tree (Attachment B, Workpaper 003) and described in Chapter 3, Section D.3, AC 2 is a Screen 3 comparison of a project-specific hybrid mitigation.

   In Screen 3, the AC 2 review considers whether (1) Tree Strike Risk meets the applicable criteria, (2) there is Ingress/Egress Risk, or (3) there is PSPS Risk. The criteria and method for each are described in Chapter 3, Section D.3.a.5 (Screen 3 Alternative Mitigation Review), as well as the Section D.3.a.8

   As part of this process, PG&E reviews available project-specific data and information, consults with the appropriate subject matter experts, and evaluates constructability and local conditions. Tree Strike Risk, Ingress/Egress Risk, and PSPS Risk are among the local risk factors considered through this iterative review to determine whether and where those conditions warrant further consideration of undergrounding. These local factors are not used to develop the 100 percent Undergrounding or Screen 3 Alternative Mitigation cases; rather, they inform the development of the project-specific scope evaluated through Additional Comparison 2 and, as applicable, Additional Comparison 3, consistent with the Screen 3 decision tree.