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

PG&E Data Request No.:	OEIS_004-Q003
PG&E File Name:	EUP-PhI_DR_OEIS_004-Q003
Request Date:	October 23, 2026
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 003

Risk model impact factor justification

a. PG&E's Post-Filing Workshop mentions that WDRM and OPRM refresh will begin in 2028. Please provide estimated model update years starting with the models used for EUP submission and ending at PG&E's proposed EUP end date. These years should reflect when the relevant models will begin impacting the EUP. If all relevant models will not be updated in the same year, please report each model and each associated update year individually.

b. PG&E's EUP cites observed variance in the change to Wildfire Distribution Risk Model (WDRM) v4 from WDRM v3 as well as Interruption Cost Estimate (ICE) 2.0 from ICE 1.0 when determining the Risk Model Impact Factor.

   i. What was the reason for the large changes observed when moving to WDRM v4 and ICE 2.0?

   ii. Does PG&E expect to see similar large shifts in these risk models? Please explain.

c. Does PG&E apply the Risk Model Impact Factor to the stated total risk reduction values of $15.1 billion Overall Utility Risk, $4.5 billion Ignition Risk and $10.6 billion Outage Program Risk?

ANSWER 003

a. Please see Table 8-4, "Risk Model Version and Calibration Update Schedule," in PG&E's EUP Volume 1. As described therein, PG&E anticipates risk model version updates beginning in 2028 and aligned with established planning cycles. Specifically, the Wildfire Distribution Risk Model (WDRM) and Outage Program Risk Model (OPRM) updates are aligned with Wildfire Mitigation Plan (WMP) cycles beginning in 2028, while Wildfire Benefit Cost Analysis (WBCA) and Enterprise Bow

Tie updates are aligned with RAMP and GRC cycles beginning in 2028. As such, PG&E currently anticipates its models to be updated in 2028, 2032, and 2036. These dates are estimates based on current planning assumptions and are subject to change based on future planning, model development, data availability, and regulatory considerations.

b.

i. WDRM v4 incorporates updated event-probability and wildfire-consequence modeling and improved underlying datasets. The most significant resulting change from WDRM v3 is a flatter distribution of modeled wildfire risk across the distribution system. This change is driven most prominently by updates to the Wildfire Consequence Model, including the incorporation of public egress and fire-suppression impacts. As a result, the primary overhead mileage corresponding to 80% of wildfire risk increased from approximately 10,000 miles under WDRM v3 to approximately 14,400 miles under WDRM v4. This information is included in PG&E, Wildfire Distribution Risk Model Version 4 Documentation, Section 5.2, Figure 17, provided in PG&E's EUP as Workpaper 026.

ICE 2.0 was developed using interruption cost surveys conducted from October through December 2024, whereas ICE 1.0 relied on surveys conducted between 1989 and 2012[1] (ICE 2.0 - PG&E Report - Final, Section 2.1 Study Methodology; ICE-Calculator2+Phase+II+Final+Report, Executive Summary). In addition to incorporating newly collected nationwide survey data, ICE 2.0 uses an enhanced methodology with expanded customer and reliability inputs, including income, work-from-home prevalence, industry mix, and SAIDI/SAIFI/CAIDI metrics. These updates better reflect current customer usage patterns and outage impacts, resulting in interruption cost estimates that differ from those produced by ICE 1.0.

ii. PG&E is actively developing future updates to the Wildfire Distribution Risk Model (WDRM). However, because those updates have not yet been finalized, PG&E cannot reasonably assess the magnitude or direction of any resulting changes relative to the current model. While PG&E has insight into potential areas of model enhancement, the methodologies, assumptions, calibration, and validation results associated with future WDRM versions remain under development.

Accordingly, PG&E cannot speculate as to whether future WDRM updates will result in shifts comparable to those observed between WDRM v3 and WDRM v4. A comprehensive assessment of the impacts of any model update can only be performed once the model development process is sufficiently complete and the updated model has been finalized for implementation.

c. No, PG&E did not apply the 20% Risk Model Impact Factor to the risk reduction values of $15.1B Overall Utility Risk, $4.5 billion Ignition Risk and $10.6 billion Outage Program Risk.

---

[1] Lawrence Berkeley National Laboratory, *ICE Calculator 2: Final Report for Phase 1 and 2 of the National Initiative to Update the Interruption Cost Estimate (ICE) Calculator*, Executive Summary (2026), available at LBNL ICE Calculator 2 Final Report.