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

PG&E Data Request No.:	OEIS_004-Q006
PG&E File Name:	EUP-PhI_DR_OEIS_004-Q006
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):	Megan Ardell; Julie Colvin

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

QUESTION 006

Climate Risk

a. PG&E's EUP uses the RCP 8.5 pathway to assess the impact of climate change and calculate climate factors to apply to KDMMs. WP005 describes this as the worst case when compared to RCP 2.6, 4.5 and 6.0. WP005 also states "Marsh did not assess the likelihood of these condition sets occurring." Describe PG&E's rationale for using this pathway.

ANSWER 006

OEIS's question appears to combine two separate analyses. PG&E's EUP risk modeling, including the climate multipliers we apply to the KDMMs, uses the SSP3-7.0 scenario. The RCP 8.5 pathway described in WP005 applies only to the supplemental analysis performed by our consultant, Marsh.

Marsh's analysis is supplemental to the EUP. It does not feed PG&E's risk and climate models used in the EUP, which utilize SSP3-7.0 for climate multipliers.

As described in WP005, Marsh used RCP 8.5 in its analyses and modeling of climate and risk impacts. Marsh's rationale for using RCP 8.5 is explained below.

The climate adjustment utilized in Marsh's analysis was developed in mid-2024 using wildfire area-burned projections published on Cal-Adapt, the State's public repository of peer-reviewed climate research supported by the California Energy Commission. These projections were developed for California's Fourth Climate Change Assessment and are available under only two emissions pathways - RCP 4.5 and RCP 8.5. PG&E, in collaboration with its consultant Marsh, selected RCP 8.5 to test how undergrounding changes wildfire risk under severe climate conditions. Projected changes in burned area were averaged across the four climate models available on Cal-Adapt for this dataset (CanESM2, CNRM-CM5, HadGEM2-ES and MIROC5) and applied as adjustments to

fire severity. Fire frequency was held at baseline levels, as the projections indicate no significant change in frequency over the modeled horizon. As noted in WP005, Marsh did not assign a likelihood to the RCP 8.5 pathway. This reflects standard practice: emissions pathways describe plausible conditional futures rather than forecasts and are thus not assigned probabilities. While D.24-08-005 has since identified SSP3-7.0 as the preferred reference emissions scenario, Cal-Adapt has not yet published SSP-based wildfire projections in a form that can replace the data underlying the current model.