

[illegible]

57	OEIS	002	OEIS_002	3	No	OEIS_002_03	Regarding PG&E's Q4 quarterly data report for 2022, 2023, and 2024 PG&E's 2024-2028 Base WMP defines "Fire Resistor" work as undergrounding installations in areas impacted by wildfires within High Fire Threat Districts (HFTD) and defining "Community Resilient" work as undergrounding installations in areas impacted by wildfire outside of the HFTD. Additionally, PG&E states that its undergrounding work includes activities under System Hardening, Data Center Resilience, Community Resilient programs, and other efforts in HFTD, High Fire Risk Area (HFRA), buffer zones, and the overall area. a. For 2024, PG&E reported 348.5 circuit miles total completed under 10K Undergrounding (GH41). Provide a breakdown of the total miles completed in 2024 by the following categories: - Undergrounding as part of System Hardening (GH41) activity - Undergrounding as part of the Fire Resilient program - Any other undergrounding work performed in HFTD, HFRA, and Buffer Zone A. For each other type of undergrounding work specified here, explain why this work was not reported under the System Hardening (GH41) activity b. For 2023, PG&E reported 383.9 circuit miles total completed under 10K Undergrounding (GH41). Provide a breakdown of the total miles completed in 2023 by the following categories: - Undergrounding as part of System Hardening (GH41) activity - Undergrounding completed as part of the Fire Resilient program - Undergrounding completed as part of the Community Resilient program - Undergrounding completed as part of the Fire Resilient program A. For each other type of undergrounding work specified here, explain why this work was not reported under the System Hardening (GH41) activity	1. The data provided is updated as of January 14, 2025. In alignment with the Q4 2024 WMP Quarterly Data Report (QDR), the data provided is slightly adjusted from the values reported in the Q4 2023 QDR due to the completion of project in-built construction packages. For clarity, in 2024, PG&E completed 257.8 miles under WMP initiative GH41-04, instead. Based on the detail included in the question, we assume the intention was to include the total completed GH41-04 mileage and associated sub-program, which is reflected in our response. 1. a. Undergrounding as part of System Hardening activity 1. b. Undergrounding as part of the Fire Resilient program 1. c. Any other undergrounding work performed in HFTD, HFRA, and Buffer Zone Total (miles) a. 2024 213.27 4 42.2 2 207.8 b. 2023 284.474 73.1 4 1 384.2 1. System Hardening Undergrounding miles are included in both 2023 Base WMP Initiative: GH41-04 System Hardening and GH41-04 Undergrounding	1. a. GH41-04 System Hardening and Fire Resilient 1. b. GH41-04 System Hardening and Fire Resilient 1. c. GH41-04 System Hardening and Fire Resilient 1. d. GH41-04 System Hardening and Fire Resilient 1. e. GH41-04 System Hardening and Fire Resilient 1. f. GH41-04 System Hardening and Fire Resilient 1. g. GH41-04 System Hardening and Fire Resilient 1. h. GH41-04 System Hardening and Fire Resilient 1. i. GH41-04 System Hardening and Fire Resilient 1. j. GH41-04 System Hardening and Fire Resilient 1. k. GH41-04 System Hardening and Fire Resilient 1. l. GH41-04 System Hardening and Fire Resilient 1. m. GH41-04 System Hardening and Fire Resilient 1. n. GH41-04 System Hardening and Fire Resilient 1. o. GH41-04 System Hardening and Fire Resilient 1. p. GH41-04 System Hardening and Fire Resilient 1. q. GH41-04 System Hardening and Fire Resilient 1. r. GH41-04 System Hardening and Fire Resilient 1. s. GH41-04 System Hardening and Fire Resilient 1. t. GH41-04 System Hardening and Fire Resilient 1. u. GH41-04 System Hardening and Fire Resilient 1. v. GH41-04 System Hardening and Fire Resilient 1. w. GH41-04 System Hardening and Fire Resilient 1. x. GH41-04 System Hardening and Fire Resilient 1. y. GH41-04 System Hardening and Fire Resilient 1. z. GH41-04 System Hardening and Fire Resilient	0	No	8	Grid Design, Operations, and Maintenance	8.2.2
58	OEIS	002	OEIS_002	4	No	OEIS_002_04	Regarding Distribution Infrared Inspections On page 22 of the 2024-2028 WMP, PG&E states that it utilized its distribution IR inspection program from inspecting all the HFTD/HFRA in 2020-2022, to focusing on specific areas with known issues expected to be discovered by its 2023-2025 yearly audits of the HFTD/HFRA. In 2023-2025, PG&E plans to "target IR to areas of emerging concern as needed." a. Provide the following distribution IR inspection data: 1. The number of inspections performed in 2021, 2022, 2023, and 2024. 2. The number of level 1 conditions identified by distribution IR inspections in 2021, 2022, 2023, and 2024. 3. The number of level 2 conditions identified by distribution IR inspections in 2021, 2022, 2023, and 2024. 4. The number of level 3 conditions identified by distribution IR inspections in 2021, 2022, 2023, and 2024. 5. The number of level 4 conditions identified by distribution IR inspections in 2021, 2022, 2023, and 2024. 6. The number of level 5 conditions identified by distribution IR inspections in 2021, 2022, 2023, and 2024. 7. Provide the estimated number of level 1 and 2 conditions that would have been identified by distribution infrared, aerial, or sensor readings, had an inspection or sensor reading been used in place of the IR inspection. 8. For each IR condition that PG&E anticipates would have been identified by a sensor reading, provide the sensor manufacturer and model number that could have identified the issue, and the percentage of PG&E's assets in the HFTD/HFRA that are currently actively monitored by the sensor. 9. For each IR condition that PG&E anticipates would have been identified by a detailed air inspection, provide a description of the visible indication expected to be present in the corresponding inspection guidance or job aid, TD-2009-04-02 ver 14. 10. Provide the criteria PG&E will use to determine areas of emerging concern that warrant IR inspections.	1. a. GH41-04 System Hardening and Fire Resilient 1. b. GH41-04 System Hardening and Fire Resilient 1. c. GH41-04 System Hardening and Fire Resilient 1. d. GH41-04 System Hardening and Fire Resilient 1. e. GH41-04 System Hardening and Fire Resilient 1. f. GH41-04 System Hardening and Fire Resilient 1. g. GH41-04 System Hardening and Fire Resilient 1. h. GH41-04 System Hardening and Fire Resilient 1. i. GH41-04 System Hardening and Fire Resilient 1. j. GH41-04 System Hardening and Fire Resilient 1. k. GH41-04 System Hardening and Fire Resilient 1. l. GH41-04 System Hardening and Fire Resilient 1. m. GH41-04 System Hardening and Fire Resilient 1. n. GH41-04 System Hardening and Fire Resilient 1. o. GH41-04 System Hardening and Fire Resilient 1. p. GH41-04 System Hardening and Fire Resilient 1. q. GH41-04 System Hardening and Fire Resilient 1. r. GH41-04 System Hardening and Fire Resilient 1. s. GH41-04 System Hardening and Fire Resilient 1. t. GH41-04 System Hardening and Fire Resilient 1. u. GH41-04 System Hardening and Fire Resilient 1. v. GH41-04 System Hardening and Fire Resilient 1. w. GH41-04 System Hardening and Fire Resilient 1. x. GH41-04 System Hardening and Fire Resilient 1. y. GH41-04 System Hardening and Fire Resilient 1. z. GH41-04 System Hardening and Fire Resilient	0	No	8	Grid Design, Operations, and Maintenance	8.3.10	
59	OEIS	002	OEIS_002	5	No	OEIS_002_05	Regarding distribution detailed aerial and ground inspections On page 22 of the WMP, PG&E sets a target of 215,000 distribution detailed inspections per year for 2024-2028. The target states the inspections can be either ground or aerial, separate targets are not provided for detailed aerial or detailed ground inspections. a. Provide the following information related to scheduling detailed aerial and ground inspections: 1. Does PG&E have controls in place to avoid an asset being only subject to one variety of detailed inspection for extended periods of time? (i.e., an asset is an area of address concerns and extreme wildfire risk only receiving detailed aerial inspections for 10 years). Provide PG&E's reasoning for its chosen approach. 2. Some hazardous conditions may be less likely identified via ground inspections while others may be less likely identified via aerial inspections. 3. Provide a list of conditions that PG&E has recognized as being more likely identified via aerial inspections and less likely identified via ground inspections. Provide a brief explanation for each condition. 4. PG&E has not recognized any such conditions. Briefly discuss its reasoning. 5. Provide a list of conditions that PG&E has recognized as being more likely identified via ground inspections and less likely identified via aerial inspections. Provide a brief explanation for each condition. 6. PG&E has not recognized any such conditions. Briefly discuss its reasoning.	1. PG&E anticipates that the most majority of detailed inspections completed in 2024-2028 will be aerial inspections. PG&E's working strategy having the aerial inspection meet PG&E's GO 165 detailed inspection requirements beginning in 2028. Ground inspections may continue to be used where aerial inspection cannot access the structure due to various issues such as customer or vegetation. Changes in HFTD/HFRA inspection frequency are reviewed and approved through PG&E's Wildlife Risk Governance Committee to ensure changes mitigate wildfire risk. As described in response to question 1, PG&E expects the detailed aerial inspection will detect all conditions that the ground inspection detects. 2. PG&E has not recognized any such conditions. PG&E has not identified any aerial inspection as an inspection deployed at scale. In 2023, the pilot aerial inspection was conducted in the HFTD/HFRA. In 2024, as PG&E began the inspection at scale for the first time, we expanded the aerial inspection to include the full structure. The aerial inspection performed by PG&E in 2024 and 2025 is a full-structure inspection, focusing on identifying Level 1 and 2 conditions. It was not detailed GO 165 inspection beginning in 2028. These include adding the requirement for aerial to report Level 3 conditions as well as the benefit of additional data to support the detailed inspection. PG&E has not identified any aerial inspection as a full inspection using a combination of drone imagery and images captured from the handheld device. 3. PG&E is identifying additional requirements to make the aerial inspection GO 165 detailed inspection beginning in 2028. These include adding the requirement for aerial to report Level 3 conditions as well as the benefit of additional data to support the detailed inspection. PG&E has not identified any aerial inspection as a full inspection using a combination of drone imagery and images captured from the handheld device. 4. PG&E has not recognized any such conditions. PG&E has not identified any aerial inspection as a full inspection using a combination of drone imagery and images captured from the handheld device. 5. PG&E has not recognized any such conditions. PG&E has not identified any aerial inspection as a full inspection using a combination of drone imagery and images captured from the handheld device. 6. PG&E has not recognized any such conditions. PG&E has not identified any aerial inspection as a full inspection using a combination of drone imagery and images captured from the handheld device.	0	No	8	Grid Design, Operations, and Maintenance	8.3.8	
60	OEIS	002	OEIS_002	6	No	OEIS_002_06	Regarding transmission detailed aerial and ground inspections On page 22 of the WMP, PG&E sets a target of 22,000 transmission detailed inspections per year. The target states the inspections can be either ground or aerial, separate targets are not provided for detailed aerial or detailed ground inspections. a. Provide supporting documentation for transmission detailed inspections, including any job aids, procedural documentation, or inspection checklists. Specify any documents that are unique to aerial or ground inspections. b. Provide the following information related to scheduling detailed aerial and ground inspections: 1. Does PG&E have controls in place to avoid an asset being only subject to one variety of detailed inspection for extended periods of time? (i.e., an asset only receiving detailed aerial inspections for 10 years). Provide PG&E's reasoning for its chosen approach. 2. Some hazardous conditions may be less likely identified via ground inspections while others may be less likely identified via aerial inspections. 3. Provide a list of conditions that PG&E has recognized as being more likely identified via aerial inspections and less likely identified via ground inspections. Provide a brief explanation for each condition. 4. PG&E has not recognized any such conditions. Briefly discuss its reasoning. 5. Provide a list of conditions that PG&E has recognized as being more likely identified via ground inspections and less likely identified via aerial inspections. Provide a brief explanation for each condition. 6. PG&E has not recognized any such conditions. Briefly discuss its reasoning.	1. PG&E has identified conditions located at the top of structures are more likely to be identified by aerial in comparison to ground inspections due to the higher vantage point of the aerial method. This includes conditions related to: • Conductor • Jumper • Insulator • Switch • Pole top • Tower peak 2. PG&E has identified conditions located at the bottom of structures are more likely to be identified by ground in comparison to aerial inspections due to the ground level vantage point of the inspection. This includes conditions related to: • Foundations • Guy • Anchor	1	No	8	Grid Design, Operations, and Maintenance	8.3.1	
61	OEIS	002	OEIS_002	7	No	OEIS_002_07	Regarding transmission switch function testing PG&E does not provide a target for its transmission switch function testing inspection program in its 2024-2028 Base WMP. However, of the ten inspection methods with that most frequent, transmission switch function testing demonstrates the highest fail rate of level 1 conditions and the fourth highest fail rate of level 2 conditions. a. Briefly discuss PG&E's reasoning for not including a complete target for transmission switch function testing. b. Provide the following data for transmission switch function testing: 1. The number of transmission switch function tests performed in the HFTD/HFRA in 2021, 2022, 2023, and 2024. 2. The number of level 1 conditions identified by transmission switch function testing in 2021, 2022, 2023, and 2024. 3. The number of level 2 conditions identified by transmission switch function testing in 2021, 2022, 2023, and 2024. 4. The number of level 3 conditions identified by transmission switch function testing in 2021, 2022, 2023, and 2024. 5. The number of level 4 conditions identified by transmission switch function testing in 2021, 2022, 2023, and 2024. 6. The number of level 5 conditions identified by transmission switch function testing in 2021, 2022, 2023, and 2024.	1. The Switch Function Test program is in the process of maturation and is reliant on appropriate, clear testing. The process of scheduling and executing these tests has been steadily improving as shown by the growth in completed inspections over the past few years. PG&E anticipates that the number of completed inspections will continue to increase as the program matures. 2. PG&E has not identified any conditions that are more likely identified by aerial in comparison to ground inspections due to the higher vantage point of the aerial method. This includes conditions related to: • Conductor • Jumper • Insulator • Switch • Pole top • Tower peak 3. PG&E has identified conditions located at the bottom of structures are more likely to be identified by ground in comparison to aerial inspections due to the ground level vantage point of the inspection. This includes conditions related to: • Foundations • Guy • Anchor	0	No	8	Grid Design, Operations, and Maintenance	8.3.5	
62	OEIS	002	OEIS_002	8	No	OEIS_002_08	Regarding vegetation management and pole clearing targets On WMP page 265, PG&E provides quantitative targets for its vegetation inspection and vegetation management programs. For the column "HFTD Covered in 2024" it appears PG&E provided the percentage of the 2028 target that is performed within the HFTD. The WMP Guidelines (page 124) defines this column as "The percentage of total overhead circuit miles in the HFTD covered by the Year 1 target (i.e., 100 circuit miles of pole inspection in Year 1, divided by 200 overhead circuit miles in the HFTD equals 50 percent coverage)". a. Provide the following information for the 2028 target: 1. PG&E's target for the 2028 target is 100% coverage. 2. PG&E's target for the 2028 target is 100% coverage. 3. PG&E's target for the 2028 target is 100% coverage. 4. PG&E's target for the 2028 target is 100% coverage. 5. PG&E's target for the 2028 target is 100% coverage. 6. 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PG&E's target for the 2028 target is 100% coverage. 95. PG&E's target for the 2028 target is 100% coverage. 96. PG&E's target for the 2028 target is 100% coverage. 97. PG&E's target for the 2028 target is 100% coverage. 98. PG&E's target for the 2028 target is 100% coverage. 99. PG&E's target for the 2028 target is 100% coverage. 100. PG&E's target for the 2028 target is 100% coverage.	0	No	9	Vegetation Management & Inspections	9.4	
63	OEIS	002	OEIS_002	9	No	OEIS_002_09	Regarding Distribution Routine Patrol inspection quantities (M&I-10) On WMP page 265, PG&E sets cumulative quarterly targets for Q4 in 2026, 2027, and 2028 of 78,200, 77,800, and 77,000 circuit miles respectively. These are annual decreases of 400 miles from 2026 to 2027, and 300 miles from 2027 to 2028. a. Do the incrementally decreasing targets reflect risks of distribution line projected to be undergrounded? 1. If so, explain how PG&E calculates the annual decrease in Distribution Routine Patrol target circuit miles. 2. If not, explain the justification for a annual decrease in Distribution Routine Patrol target circuit miles. b. Regarding PG&E's Pole Clipping Program target (M&I-10) On page 265 of the 2024-2028 Base WMP, PG&E sets cumulative quarterly targets for Q4 in 2026, 2027, and 2028 of 78,200 distribution poles.							

							SPO is attempting to compute the cost per unit for many of the WMP initiatives treated in the WMP Implementation Dashboard (WMP Implementation Dashboard). Review and confirm the cost per unit is correct for the initiatives. See the attached worksheet titled PGE WMP Implementation Dashboard.xlsx. A. Follow all of the instructions within the cells and notes included in PGE WMP Implementation Dashboard.xlsx. B. SPO is attempting to do a similar exercise for the 2020-2028 WMP but the QDR data table was not submitted. SPO saw some of the data in the WMP but was unable to determine if this data was inclusive of all initiatives. Where should SPO look for equivalent data?	K. Please see attachment "WMP-Discovery2020-2028_DR_SPO_001-Q21Rev01.xlsx" for the requested information. The values provided in the Excel file section titled "PGE Response" represent PGE's response to the data request using the formulae and data sources provided by SPO, except to the extent amended as described below, and do not reflect PGE's official or final calculation of the unit costs associated with the listed WMP initiatives. Please note, the values in the "PGE RESPONSE" worksheet are based on SPO's instructions, data, and formulae but with the following amendments, adjustments, and corrections: * PGE has updated values in the "Total Cost" column for the year 2024 to reflect final, actual (as reported to forecasted) costs as reported in our 2024 Annual Report on Compliance (ARC). * PGE has updated "Units Planned/Completed" for the year 2024 to reflect final units as reported in our 2023 and 2024 ARC. * Initiatives GH-01 (System Hardening) and GH-04 (Undergrounding) do not calculate unit costs using the method proposed by SPO. The following are clarifications about how unit costs are calculated for these projects. These corrections have been incorporated into worksheet GH-01 & GH-04 Unit Cost" in attachment WMP-Discovery2020-2028_DR_SPO_001-Q21Rev01.xlsx. The 2023 and 2024 unit costs are from historically completed projects. The 2025 unit costs are preliminarily based on forecasts with a current description that contains more noise than inputs. (1) WMP Reporting Clarifications: As approved in the 2023 WMP, the GH 01 initiative includes the System Hardening (undergrounding) phase, as well as the overhead hardening and line removal work. In Table 11 of the WMP QDR, the undergrounding costs, however, are not reported for GH-01 in order to not double-count these costs reported in GH-04. The System Hardening (undergrounding) phase, however, are reported in Table 11 of the QDR and ARC. Therefore, the approach to divide cost spent per year by the units is not appropriate. - Additionally, for WMP reporting, PGE includes hardening miles from non-System Hardening programs like Work Requested by Other (WRO).	Eddie Schmitt	4/15/2025	5/7/2025	5/7/2025	https://www.pge.com/Invest/Pages/Docs/Outages_and_safety/Undergrounding-and-safety/2025-SPO_001.zip	1	No	3	Overview of WMP	3.8
94	SPO	001	SPO_001	21(a)	Yes	SPO_001_Q21(a)	SPO is attempting to compute the cost per unit for many of the WMP initiatives treated in the WMP Implementation Dashboard (WMP Implementation Dashboard). Review and confirm the cost per unit is correct for the initiatives. See the attached worksheet titled PGE WMP Implementation Dashboard.xlsx. A. Follow all of the instructions within the cells and notes included in PGE WMP Implementation Dashboard.xlsx. B. SPO is attempting to do a similar exercise for the 2020-2028 WMP but the QDR data table was not submitted. SPO saw some of the data in the WMP but was unable to determine if this data was inclusive of all initiatives. Where should SPO look for equivalent data?	K. Please see attachment "WMP-Discovery2020-2028_DR_SPO_001-Q21Rev01.xlsx" for the requested information. The values provided in the Excel file section titled "PGE Response" represent PGE's response to the data request using the formulae and data sources provided by SPO, except to the extent amended as described below, and do not reflect PGE's official or final calculation of the unit costs associated with the listed WMP initiatives. Please note, the values in the "PGE RESPONSE" worksheet are based on SPO's instructions, data, and formulae but with the following amendments, adjustments, and corrections: * WMP-Discovery2020-2028_DR_SPO_001-Q21Rev01 Page 2 * PGE has updated values in the "Total Cost" column for the year 2024 to reflect final, actual (as reported to forecasted) costs as reported in our 2024 Annual Report on Compliance (ARC). * PGE has updated "Units Planned/Completed" for the year 2024 to reflect final units as reported in our 2023 and 2024 ARC. * Initiatives GH-01 (System Hardening) and GH-04 (Undergrounding) do not calculate unit costs using the method proposed by SPO. The following are clarifications about how unit costs are calculated for these projects. These corrections have been incorporated into worksheet GH-01 & GH-04 Unit Cost" in attachment WMP-Discovery2020-2028_DR_SPO_001-Q21Rev01.xlsx. The 2023 and 2024 unit costs are from historically completed projects. The 2025 unit costs are preliminarily based on forecasts with a current description that contains more noise than inputs. (1) WMP Reporting Clarifications: As approved in the 2023 WMP, the GH 01 initiative includes the System Hardening (undergrounding) phase, as well as the overhead hardening and line removal work. In Table 11 of the WMP QDR, the undergrounding costs, however, are not reported for GH-01 in order to not double-count these costs reported in GH-04. The System Hardening (undergrounding) phase, however, are reported in Table 11 of the QDR and ARC. Therefore, the approach to divide cost spent per year by the units is not appropriate. - Additionally, for WMP reporting, PGE includes hardening miles from non-System Hardening programs like Work Requested by Other (WRO).	Eddie Schmitt	4/15/2025	5/22/2025	5/22/2025	https://www.pge.com/Invest/Pages/Docs/Outages_and_safety/Undergrounding-and-safety/2025-SPO_001.zip	1	No	3	Overview of WMP	3.8
95	SPO	001	SPO_001	22	No	SPO_001_Q22	The 2020-2028 WMP states on page 162 that the System Hardening Project Scoping Decision Tree and Process is shown in Figures PG&E-8.2-1, PG&E-8.2-2, and PG&E-8.2-3 will begin to inform the selection of projects in 2027. What methodology is being used for 2027?	Methodology for SRM, investment, PGE, and other initiatives from the WMP. The system hardening decision tree presented in PG&E's 2023-2025 Basic WMP figures SRM-PG&E-2.3-5-564, SRM-PG&E-2.3-5-565, SRM-PG&E-2.3-5-566 (the decision tree used in the staffing process for selecting system hardening initiatives for 2026). The Migration Selection, Planning and Execution process referenced in Figure PG&E-6.1.3-4 describes the general process by which PGE's Investment Planning Organization considers budgets for mitigation programs. Figure PG&E-8.2-1-1, PG&E-8.2-1-2, and PG&E-8.2-1-3 is the decision tree used by the System Hardening Program for choosing system hardening mitigation alternatives for projects starting in 2027. We use the budgets developed by Investment Planning shown in Figure PG&E-8.1.3-4 to fund the system hardening mitigations. Figure PG&E-8.2-1-3, PG&E-8.2-1-2, and PG&E-8.2-1-3 are the decision tree that we use to choose system hardening mitigation alternatives for projects starting in 2027. It is derived from the WMP and the individual figures are not mutually exclusive. To be clear, there are not four decision trees used to determine some form of system hardening. The decision tree is a single decision tree. There are only one decision tree (Figure PG&E-8.2-1-1, PG&E-8.2-1-2, and PG&E-8.2-1-3) that the system hardening study made possible by the decision tree. (1) do not implement system hardening; (2) implement a 100% overhead hardening solution; (3) implement a 100% undergrounding solution; (4) implement a hybrid hardening solution. WMP-Discovery2020-2028_DR_SPO_001-Q23 Page 2 Solution where portions of a line are undergrounded and other portions are overhead hardened; and (5) implement a line removal with remote gap solution. Figure PG&E-6.1.1-4 is a high-level illustration showing the scope view of how we consider risk drivers to develop mitigation alternatives, develop an investment plan to fund the mitigations and then execute them. The decision tree is not used to select system hardening mitigation alternatives.	Eddie Schmitt	4/15/2025	4/18/2025	4/18/2025	https://www.pge.com/Invest/Pages/Docs/Outages_and_safety/Undergrounding-and-safety/2025-SPO_001.zip	0	No	8	Grid Design, Operations, and Maintenance	8.2.1
96	SPO	001	SPO_001	23	No	SPO_001_Q23	Provide a narrative explanation regarding how the decision tree on pg. 125 of PGE's 2020-2028 WMP (Figure PG&E-6.1.3-4) and the decision tree on pg. 183-185 (Figure PG&E-8.2-1-1, PG&E-8.2-1-2, and PG&E-8.2-1-3) are related. A. Provide examples of how the four decision trees were used to determine some form of system hardening as the selected mitigation at given circuit segment. The examples should illustrate of the system hardening results made possible by these four decision trees.	Figure PG&E-8.2-1-1, PG&E-8.2-1-2, and PG&E-8.2-1-3 is the decision tree used by the System Hardening Program for choosing system hardening mitigation alternatives for projects starting in 2027. The table the budgets developed by Investment Planning shown in Figure PG&E-8.1.3-4 is for the system hardening mitigation. Figure PG&E-8.2-1-3, PG&E-8.2-1-2, PG&E-8.2-1-3, and PG&E-8.2-1-3 are the decision tree that we use to choose system hardening mitigation alternatives for projects starting in 2027. It is derived from the WMP and the individual figures are not mutually exclusive. To be clear, there are not four decision trees used to determine some form of system hardening. The decision tree is a single decision tree. There are only one decision tree (Figure PG&E-8.2-1-1, PG&E-8.2-1-2, and PG&E-8.2-1-3) that the system hardening study made possible by the decision tree. (1) do not implement system hardening; (2) implement a 100% overhead hardening solution; (3) implement a 100% undergrounding solution; (4) implement a hybrid hardening solution. WMP-Discovery2020-2028_DR_SPO_001-Q23 Page 2 Solution where portions of a line are undergrounded and other portions are overhead hardened; and (5) implement a line removal with remote gap solution. Figure PG&E-6.1.1-4 is a high-level illustration showing the scope view of how we consider risk drivers to develop mitigation alternatives, develop an investment plan to fund the mitigations and then execute them. The decision tree is not used to select system hardening mitigation alternatives.	Eddie Schmitt	4/15/2025	4/18/2025	4/18/2025	https://www.pge.com/Invest/Pages/Docs/Outages_and_safety/Undergrounding-and-safety/2025-SPO_001.zip	0	No	6	Wildfire Mitigation Strategy Development	6.1.3
97	SPO	001	SPO_001	24	No	SPO_001_Q24	In response to WMP-Discovery2020-2028_DR_TURN_002-Q04, PGE references the Wildfire Benefit Cost Analysis (WBCA) Tool. Provide a description of the WBCA Tool as referenced in PGE's 5th Revision to its 2023-2028 WMP on pg. 423 and on page 187 of the 2020-2028 WMP that includes the following: A. An explanation of how Cost-Benefit Ratios are calculated within the Tool. B. An explanation of how the Tool complies with the requirements of 0.22-12-027. C. An explanation of how the Tool complies with the requirements of 0.24-05-004. D. A definition for each of the following terms presented in TABLE 1: PGE-20-05-0-3 of PGE's 5th Revision to its 2023-2028 WMP on pg. 427. 1. PGE's Cap. Invest. 2. Lifetime Cost 3. Lifetime Benefit 4. Lifetime Reliability 5. Lifetime Safety 6. Lifetime Reliability 7. Lifetime Safety 8. Lifetime Reliability 9. Lifetime Safety 10. Lifetime Reliability 11. Lifetime Safety 12. Lifetime Reliability 13. Lifetime Safety 14. Lifetime Reliability 15. Lifetime Safety 16. Lifetime Reliability 17. Lifetime Safety 18. Lifetime Reliability 19. Lifetime Safety 20. Lifetime Reliability 21. Lifetime Safety 22. Lifetime Reliability 23. Lifetime Safety 24. Lifetime Reliability 25. Lifetime Safety 26. Lifetime Reliability 27. Lifetime Safety 28. Lifetime Reliability 29. Lifetime Safety 30. Lifetime Reliability 31. Lifetime Safety 32. Lifetime Reliability 33. Lifetime Safety 34. Lifetime Reliability 35. Lifetime Safety 36. Lifetime Reliability 37. Lifetime Safety 38. Lifetime Reliability 39. Lifetime Safety 40. Lifetime Reliability 41. Lifetime Safety 42. Lifetime Reliability 43. Lifetime Safety 44. Lifetime Reliability 45. Lifetime Safety 46. Lifetime Reliability 47. Lifetime Safety 48. Lifetime Reliability 49. Lifetime Safety 50. Lifetime Reliability	A. Yes, PGE intends to use the WBCA, in addition to other analysis, to select mitigations for its 2027 GRC system hardening program. 1. N/A 2. We will use the WBCA to: (1) aggregate risk analysis for circuit segments and (2) generate CIRs and Net Benefits for mitigation alternatives (undergrounding, overhead hardening, & Electrical Protective Safety Setting - Downed Conductor Detection, and hybrid mitigations) for each circuit segment. PGE will further evaluate the circuit segment risk ratings, CIRs and Net Benefits from the WBCA, along with other considerations such as system hardening and investments, to ultimately select the mitigation for each circuit segment. WMP-Discovery2020-2028_DR_SPO_001-Q25 Page 2 In its 2024 RAMP PGE planned three system hardening mitigations for 2027-2030: 1. System hardening undergrounding (WLFRA002); 2. System hardening overhead hardening (WLFRA002); 3. Line removal with remote gap (WLFRA001). The three system hardening mitigations planned in the 2024 RAMP will be considered in the WBCA for PGE's 5th Revision to its 2027 GRC.	Eddie Schmitt	4/15/2025	4/25/2025	4/25/2025	https://www.pge.com/Invest/Pages/Docs/Outages_and_safety/Undergrounding-and-safety/2025-SPO_001.zip	0	No	5	Risk Methodology & Assessment	5.4
98	SPO	001	SPO_001	25	No	SPO_001_Q25	State the things where PGE has used the Wildfire Benefit Cost Analysis Tool (i.e. RAMP, GRC, WMP, other proceedings or filings). A. Does PGE intend to apply the Wildfire Benefit Cost Analysis Tool in its 2027 Year GRC Application? B. If yes, explain why not. C. If yes, explain how this tool will be applied in the 2027 Year GRC Application. D. Which mitigations presented in the 2024 RAMP Application will be impacted by PGE's use of the Wildfire Benefit Cost Analysis Tool when PGE's 5th Revision to its 2027 Year GRC Application?	A. Yes, PGE intends to use the WBCA, in addition to other analysis, to select mitigations for its 2027 GRC system hardening program. 1. N/A 2. We will use the WBCA to: (1) aggregate risk analysis for circuit segments and (2) generate CIRs and Net Benefits for mitigation alternatives (undergrounding, overhead hardening, & Electrical Protective Safety Setting - Downed Conductor Detection, and hybrid mitigations) for each circuit segment. PGE will further evaluate the circuit segment risk ratings, CIRs and Net Benefits from the WBCA, along with other considerations such as system hardening and investments, to ultimately select the mitigation for each circuit segment. WMP-Discovery2020-2028_DR_SPO_001-Q25 Page 2 In its 2024 RAMP PGE planned three system hardening mitigations for 2027-2030: 1. System hardening undergrounding (WLFRA002); 2. System hardening overhead hardening (WLFRA002); 3. Line removal with remote gap (WLFRA001). The three system hardening mitigations planned in the 2024 RAMP will be considered in the WBCA for PGE's 5th Revision to its 2027 GRC.	Eddie Schmitt	4/15/2025	4/18/2025	4/18/2025	https://www.pge.com/Invest/Pages/Docs/Outages_and_safety/Undergrounding-and-safety/2025-SPO_001.zip	0	No	5	Risk Methodology & Assessment	5.4

107	CEIS	003	CEIS_003	6	No	CEIS_003_06	Regarding Pole Clearing Table 9-2 shows an Activity Timeline Target of 365 days for Pole Clearing Program (MA02). a. Explain how the timeline target allows PG&E to maintain compliance with PRC 4202. b. Provide documentation of an example of past conditions that required PG&E to use a substantial portion of the 365-day Activity Timeline Target to complete pole clearing work.	To maintain compliance with PRC 4202, PG&E performs year-round pole clearing activities. The T-171155 Section 7.1 "Annual Planning," pole clearing personnel must perform inspection and work at each designated location to ensure compliance with PRC 4202. Pole clearing activities occur during four phases which are conducted annually: 1. Inspection: October of the Prior Year – March 2. Initial Clear: January – April 3. Maintenance 1: 1801 Except for "Inspect No Work" locations, all documented Subject Poles are targeted for clearance. May – August 4. Maintenance 2: 1802 Except for "Inspect No Work" locations, all documented Subject Poles are targeted for clearance. September – December WMP-Discovery 2020-2028, DR, CEIS, 003-0204 Page 2 c. Please note to responses to 7.1 for the first phases submitted and utilized annually by the Pole Clearing program that covers the 365-day timeline intended to ensure we remain compliant with the PRC 4202 guidelines for our MA02 activities. These phases allow us to actively coordinate, regroup and re-evaluate our activities and to adjust our activities as needed. d. Please provide a table of PRC 4202 and PRC 4203 violations. Please see WMP 2020-2028, DR, CEIS, 003-0204 Page 2 for the end of Q2 to end of the year. PG&E understands the need to maintain compliance with PRC 4201 can be completed by the end of the year. e. PG&E understands the need to refer to MA05, MA09, and MA07, which perform definable space inspections for substations and powerlines and pole clearing work. Please see WMP-Discovery2020-2028, DR, CEIS, 003-0207 601071.g for an example of an external factor that may temporarily delay our ability to perform definable space inspections at substations and powerlines in general. These factors may include, but are not limited to, physical conditions.	Nathan Poon	4/15/2025	4/18/2025	4/18/2025	https://www.pge.com/Invest/Pages/Outages-and-safety/outage-preparedness-and-support/2025-003-003-06	0	No	9	Vegetation Management & Inspections	5.4
108	CEIS	003	CEIS_003	7	No	CEIS_003_07	Regarding Substation Inspection Timeline Table 9-2 shows an Activity Timeline Target of 274 days for Substation Inspections - Distribution (VM-05). a. Explain how the timeline target allows PG&E to maintain compliance with PRC 4291. b. Provide documentation of an example of past conditions that required PG&E to use a substantial portion of the 274-day Activity Timeline Target to complete pole clearing work.	PG&E objects to the request in the grounds that continuing discovery obligations are not permitted under California law. See: <i>Bliss v. Excess Mgmt Corp.</i>, 124 Cal App 4th 1315, 1328 (2004), Code Civ. Proc. § 2033.060(g). Notwithstanding and without waiving this objection, PG&E responds as follows: Discovery provided to Energy Safety and other requesting parties is publicly posted and available to the public via the California Public Records Act (CPRA) at https://www.pge.com/Invest/Pages/Outages-and-safety/outage-preparedness-and-support/2025-003-003-07. Discovery provided to Energy Safety and other requesting parties is publicly posted and available on PG&E's website at Community Website Safety Program. The online format version (Email of PG&E's WMP-DR Summary is updated on our website).	Nathan Poon	4/15/2025	4/18/2025	4/18/2025	https://www.pge.com/Invest/Pages/Outages-and-safety/outage-preparedness-and-support/2025-003-003-07	1	No	8	Grid Design, Operations, and Maintenance	8.3.15
109	SPD	002	SPD_002	1	No	SPD_002_01	Every Friday by noon, provide SPD with copies of any data requests PG&E received from the Office of Energy Infrastructure Safety (Energy Safety) or any other party within the previous seven days. Include any attachments, appendices or datasets in the native format that were submitted to PG&E with the data requests.	PG&E objects to the request in the grounds that continuing discovery obligations are not permitted under California law. See: <i>Bliss v. Excess Mgmt Corp.</i>, 124 Cal App 4th 1315, 1328 (2004), Code Civ. Proc. § 2033.060(g). Notwithstanding and without waiving this objection, PG&E responds as follows: Discovery provided to Energy Safety and other requesting parties is publicly posted and available on PG&E's website at Community Website Safety Program. The online format version (Email of PG&E's WMP-DR Summary is updated on our website).	Eddie Schmitt	4/16/2025	4/18/2025	4/18/2025	https://www.pge.com/Invest/Pages/Outages-and-safety/outage-preparedness-and-support/2025-003-002-01	0	No	N/A	N/A	N/A
110	SPD	002	SPD_002	2	No	SPD_002_02	Every Friday by noon, provide SPD with any responses to data requests that PG&E sent to Energy Safety or any other party within the previous seven days. Include any attachments, appendices or datasets in the native format that were sent to Energy Safety or any other party with the data requests.	PG&E objects to the request in the grounds that continuing discovery obligations are not permitted under California law. See: <i>Bliss v. Excess Mgmt Corp.</i>, 124 Cal App 4th 1315, 1328 (2004), Code Civ. Proc. § 2033.060(g). Notwithstanding and without waiving this objection, PG&E responds as follows: Discovery provided to Energy Safety and other requesting parties is publicly posted and available on PG&E's website at Community Website Safety Program. The online format version (Email of PG&E's WMP-DR Summary is updated on our website).	Eddie Schmitt	4/16/2025	4/18/2025	4/18/2025	https://www.pge.com/Invest/Pages/Outages-and-safety/outage-preparedness-and-support/2025-003-002-02	0	No	N/A	N/A	N/A
111	SPD	002	SPD_002	3	No	SPD_002_03	Every Friday by noon, provide SPD with the updated native format version (i.e., Excel) of the PG&E WMP DR Summary that is submitted weekly to the Energy Safety office.	PG&E objects to the request in the grounds that continuing discovery obligations are not permitted under California law. See: <i>Bliss v. Excess Mgmt Corp.</i>, 124 Cal App 4th 1315, 1328 (2004), Code Civ. Proc. § 2033.060(g). Notwithstanding and without waiving this objection, PG&E responds as follows: Discovery provided to Energy Safety and other requesting parties is publicly posted and available on PG&E's website at Community Website Safety Program. The online format version (Email of PG&E's WMP-DR Summary is updated on our website).	Eddie Schmitt	4/16/2025	4/18/2025	4/18/2025	https://www.pge.com/Invest/Pages/Outages-and-safety/outage-preparedness-and-support/2025-003-002-03	0	No	N/A	N/A	N/A
112	TURN	003	TURN_003	1	No	TURN_003_01	Please provide PG&E's wildfire risk model (WORM) and assumptions and results in Excel. Please provide all inputs and assumptions available. At minimum, this should include Circuit Protection Zone (CPZ) name, likelihood, consequences, total risk score, and number of overhead miles of each CPZ in separate columns. In addition, please include the following: a. Indicate which CPZs are prioritized for underwriting from 2020-2023 (please indicate the year and risk level). b. Indicate which CPZs are prioritized for overhead hardening from 2020-2023 (please indicate the year and risk level). c. Please provide an estimate, by activity, of total annual cost and risk reduction, for all wildfire mitigation activities from 2020-2023 (percent). d. Please explain whether this risk reduction has been incorporated into PG&E's baseline risk. Please provide all supporting calculations and data in Excel.	PG&E objects to the request in the grounds that continuing discovery obligations are not permitted under California law. See: <i>Bliss v. Excess Mgmt Corp.</i>, 124 Cal App 4th 1315, 1328 (2004), Code Civ. Proc. § 2033.060(g). Notwithstanding and without waiving this objection, PG&E responds as follows: Discovery provided to Energy Safety and other requesting parties is publicly posted and available on PG&E's website at Community Website Safety Program. The online format version (Email of PG&E's WMP-DR Summary is updated on our website).	Raina Yangbia	4/17/2025	4/20/2025	4/20/2025	https://www.pge.com/Invest/Pages/Outages-and-safety/outage-preparedness-and-support/2025-003-003-01	3	No	5	Risk Methodology & Assessment	5.4
113	TURN	003	TURN_003	2	No	TURN_003_02	Please provide an estimate, by activity, of total annual cost and risk reduction, for all wildfire mitigation activities from 2020-2023 (percent). a. Please explain whether this risk reduction has been incorporated into PG&E's baseline risk. Please provide all supporting calculations and data in Excel.	PG&E objects to the request in the grounds that continuing discovery obligations are not permitted under California law. See: <i>Bliss v. Excess Mgmt Corp.</i>, 124 Cal App 4th 1315, 1328 (2004), Code Civ. Proc. § 2033.060(g). Notwithstanding and without waiving this objection, PG&E responds as follows: Discovery provided to Energy Safety and other requesting parties is publicly posted and available on PG&E's website at Community Website Safety Program. The online format version (Email of PG&E's WMP-DR Summary is updated on our website).	Raina Yangbia	4/17/2025	4/20/2025	4/20/2025	https://www.pge.com/Invest/Pages/Outages-and-safety/outage-preparedness-and-support/2025-003-003-02	0	No	5	Risk Methodology & Assessment	5.4
114	TURN	003	TURN_003	3	No	TURN_003_03	In Excel, please provide the outputs of the PSPS and EPSS risk models, respectively, with the same circuit/CPZ identifiers as provided in the previous questions. At minimum, this should include Circuit Protection Zone (CPZ) name, likelihood, consequences, total risk score, and number of overhead miles of each CPZ in separate columns. In addition, please include which CPZs are targeted for PSPS and EPSS mitigation from 2020-2023. Please indicate what the mitigation is.	PG&E objects to the request in the grounds that continuing discovery obligations are not permitted under California law. See: <i>Bliss v. Excess Mgmt Corp.</i>, 124 Cal App 4th 1315, 1328 (2004), Code Civ. Proc. § 2033.060(g). Notwithstanding and without waiving this objection, PG&E responds as follows: Discovery provided to Energy Safety and other requesting parties is publicly posted and available on PG&E's website at Community Website Safety Program. The online format version (Email of PG&E's WMP-DR Summary is updated on our website).	Raina Yangbia	4/17/2025	4/20/2025	4/20/2025	https://www.pge.com/Invest/Pages/Outages-and-safety/outage-preparedness-and-support/2025-003-003-03	1	No	5	Risk Methodology & Assessment	5.4
115	TURN	003	TURN_003	4	No	TURN_003_04	Section 5.1.1, Page 120 states PG&E estimates that the average cost for primary distribution underpinning is approximately \$13 million per mile and the average cost for total covered conductor is approximately \$1.1 million per mile. a. Please provide support for these estimates, including any calculations in Excel. b. Are both estimates in dollars per overhead mile? If not, please provide PG&E's estimates in dollars per overhead mile and provide the underlying assumptions/calculations to show how the estimates were formed. c. For all underpinning projects completed from 2018 to 2024, please provide, on a project-level basis, the following information in Excel with supporting data and calculations: i. the dates of the project (start and finish), ii. number of overhead miles removed, iii. number of overhead miles removed, iv. overhead miles underpinning, and v. cost per overhead mile. d. If not, the question asks for "number of overhead miles removed" and "overhead miles removed." We are assuming those are the same request and we included one request in our response. Additionally, please the unit cost is associated with underpinning miles installed, we have included the underpinning miles installed as an additional column in the dataset. e. Note, the start date reflects when the project was first identified for accounting, the end date reflects when the project was fully completed. f. Year complete signifies the year a subproject completed the first Fire Risk Safety Audit, which may differ from the end date year, which reflects when the project was fully completed. g. Some subprojects have completed their audit, but can be in the middle of the project. h. The subproject was initiated (i.e., start of project) according to the end of the project (i.e., completion complete) for both underpinning and overhead subprojects between 2018 and 2024, until between base system hardening and fire safety work. i. A new release about the subproject data provided in the "Duration Analysis" section of the dataset. j. Current End Date represents the date construction was completed. If the date was not available, we provided the date the project was completed. k. As identified in Column "projects were removed from the analysis" if there were any removed projects. l. Negative duration (i.e., construction end date showed prior to the project start date) is missing data (i.e., data was not captured at the time). m. Data discrepancies (i.e., where we know that construction end date is inaccurate based on when the project was completed and passed the Fire Risk Safety Audit). n. Projects with less than 14-day durations were removed from the average calculation in the "Summary" worksheet based on the fact that the project duration of the subproject work. o. Please see the discussion of cumulative risk to PG&E's 2025 WMP Update (PG&E's 2025 Wildfire Mitigation Plan Update R. p. 57-68). While scope of relative construction has not explicitly been incorporated into PG&E's risk modeling and cost-benefit analysis, PG&E manages its suite of wildfire mitigation initiatives to minimize cumulative risk exposure and does account for the time value of risk based on the useful life of the asset. Specifically, PG&E uses an integrated mitigation strategy to manage wildfire risk across our system while we implement new permanent risk reduction strategies like underpinning and other system hardening work. PG&E's objective when scheduling mitigation initiatives is to ensure that we have built sufficient risk mitigation into the system to minimize risk exposure as we develop our long-term system hardening programs. PG&E achieves this through a suite of Comprehensive Monitoring and Data Collection programs designed to provide insight into the changing environmental landscape.	PG&E objects to the request in the grounds that continuing discovery obligations are not permitted under California law. See: <i>Bliss v. Excess Mgmt Corp.</i>, 124 Cal App 4th 1315, 1328 (2004), Code Civ. Proc. § 2033.060(g). Notwithstanding and without waiving this objection, PG&E responds as follows: Discovery provided to Energy Safety and other requesting parties is publicly posted and available on PG&E's website at Community Website Safety Program. The online format version (Email of PG&E's WMP-DR Summary is updated on our website).	Raina Yangbia	4/17/2025	4/20/2025	4/20/2025	https://www.pge.com/Invest/Pages/Outages-and-safety/outage-preparedness-and-support/2025-003-003-04	1	No	6	Wildfire Mitigation Strategy Development	6.1.3.1
116	TURN	003	TURN_003	5	No	TURN_003_05	Section 5.1.1, Page 120 states PG&E estimates that the average cost for primary distribution underpinning is approximately \$13 million per mile and the average cost for total covered conductor is approximately \$1.1 million per mile. a. Please provide support for these estimates, including any calculations in Excel. b. Are both estimates in dollars per overhead mile? If not, please provide PG&E's estimates in dollars per overhead mile and provide the underlying assumptions/calculations to show how the estimates were formed. c. For all underpinning projects completed from 2018 to 2024, please provide, on a project-level basis, the following information in Excel with supporting data and calculations: i. the dates of the project (start and finish), ii. number of overhead miles removed, iii. number of overhead miles removed, iv. overhead miles underpinning, and v. cost per overhead mile. d. If not, the question asks for "number of overhead miles removed" and "overhead miles removed." We are assuming those are the same request and we included one request in our response. Additionally, please the unit cost is associated with underpinning miles installed, we have included the underpinning miles installed as an additional column in the dataset. e. Note, the start date reflects when the project was first identified for accounting, the end date reflects when the project was fully completed. f. Year complete signifies the year a subproject completed the first Fire Risk Safety Audit, which may differ from the end date year, which reflects when the project was fully completed. g. Some subprojects have completed their audit, but can be in the middle of the project. h. The subproject was initiated (i.e., start of project) according to the end of the project (i.e., completion complete) for both underpinning and overhead subprojects between 2018 and 2024, until between base system hardening and fire safety work. i. A new release about the subproject data provided in the "Duration Analysis" section of the dataset. j. Current End Date represents the date construction was completed. If the date was not available, we provided the date the project was completed. k. As identified in Column "projects were removed from the analysis" if there were any removed projects. l. Negative duration (i.e., construction end date showed prior to the project start date) is missing data (i.e., data was not captured at the time). m. Data discrepancies (i.e., where we know that construction end date is inaccurate based on when the project was completed and passed the Fire Risk Safety Audit). n. Projects with less than 14-day durations were removed from the average calculation in the "Summary" worksheet based on the fact that the project duration of the subproject work. o. Please see the discussion of cumulative risk to PG&E's 2025 WMP Update (PG&E's 2025 Wildfire Mitigation Plan Update R. p. 57-68). While scope of relative construction has not explicitly been incorporated into PG&E's risk modeling and cost-benefit analysis, PG&E manages its suite of wildfire mitigation initiatives to minimize cumulative risk exposure and does account for the time value of risk based on the useful life of the asset. Specifically, PG&E uses an integrated mitigation strategy to manage wildfire risk across our system while we implement new permanent risk reduction strategies like underpinning and other system hardening work. PG&E's objective when scheduling mitigation initiatives is to ensure that we have built sufficient risk mitigation into the system to minimize risk exposure as we develop our long-term system hardening programs. PG&E achieves this through a suite of Comprehensive Monitoring and Data Collection programs designed to provide insight into the changing environmental landscape.	PG&E objects to the request in the grounds that continuing discovery obligations are not permitted under California law. See: <i>Bliss v. Excess Mgmt Corp.</i>, 124 Cal App 4th 1315, 1328 (2004), Code Civ. Proc. § 2033.060(g). Notwithstanding and without waiving this objection, PG&E responds as follows: Discovery provided to Energy Safety and other requesting parties is publicly posted and available on PG&E's website at Community Website Safety Program. The online format version (Email of PG&E's WMP-DR Summary is updated on our website).	Raina Yangbia	4/17/2025	4/20/2025	4/20/2025	https://www.pge.com/Invest/Pages/Outages-and-safety/outage-preparedness-and-support/2025-003-003-05	1	No	6	Wildfire Mitigation Strategy Development	6.1.3.1

154	MGRA	005	MGRA_005	2	No	MORA_005_02	Suppression MORA-5.5 During a meeting of the Risk Mitigation Working Group, I recall one of the PG&E team stating that they had looked at the CalFire system database to determine whether weather model conditions affected the probability of successful strike. a. The answer is yes, please provide the results. b. Is the PG&E FFI model available through a public interface? i.e. if a latitude, longitude, and elevation is provided can a computing FFI value be returned? c. If the answer to b is no, what is the approximate volume of PG&E's FFI history (could it potentially be exported, and how much time does it take to generate)? d. A PG&E's FFI algorithm has changed over time. Has PG&E segregated historical periods with different FFI approaches? Or has it used its history with the most advanced approach?	a. PG&E did not perform a study that evaluated if local weather conditions affected the probability of successful initial attack. We did perform a study briefly discussed during a recent Risk Mitigation Working Group meeting that evaluated classes of the FFI model. This did show that most lightning discharges/escaped event during the first 24 hours from the initial fire detection. See the table below. b. While the PG&E FFI is not available through a public interface, only FFI 5.0 ratings by Fire Index Area (FIA) back to 2008 are provided in "WMP-Discovery2026-2028_DR_MGRA_005-Q003A0101". This allows for an FFI 5.0 rating to be returned with a latitude, longitude and date. c. No. d. PG&E both retains the FFI ratings that were forecast using the operational FFI model of the time and retains a FFI historical dataset as provided (using the weather/fuels climatology) using the latest model in production. See attachment associated with part b.	Joseph Mitchell	4/25/2025	4/30/2025	4/30/2025	https://www.pge.com/content/dam/pgc/forecasting-and-supply/2026-2028-mgdra_005_02.pdf	1	No	Appendix D	Appendix D: Areas of Continued Improvement	AO PG&E 238-03
155	MGRA	005	MGRA_005	3	No	MORA_005_03	Covered Conductor MORA-5.6 In Table PG&E-8.2.1-4, COVERED CONDUCTOR AND UNDERGROUNDING IMPACTS ON THE LIKELIHOOD OF IGNITION, PG&E's analysis of this-to-What condition the effectiveness of Covered Conductor as a medium in reducing this risk source, whereas other parties rank this as a high effectiveness. a. Please justify why wire-to-wire contact is only reduced to a medium outage prevention? b. Please provide examples in which wire to wire contact between covered conductors, weather in an outage and under what conditions.	a. The referenced line item in table PG&E-8.2.1-4 was mislabeled as wire-to-wire contact. This driver should have been labeled: Equipment / facility failure - Secondary damage or failure. This update will be reflected in a forthcoming substation events targeted for May 16, 2025. b. PG&E's qualitative assessment of the effectiveness of covered conductor for wire-to-wire contact is rated as Very High. c. PG&E does not track covered conductor outages we have wire outages and does not have examples of wire-to-wire contact readily available.	Joseph Mitchell	4/25/2025	4/30/2025	4/30/2025	https://www.pge.com/content/dam/pgc/forecasting-and-supply/2026-2028-mgdra_005_03.pdf	0	No	8	Grid Design, Operations, and Maintenance	8.2.1
156	MGRA	005	MGRA_005	4	No	MORA_005_04	Advanced Technology MORA-5.4 Please direct us to or provide the technical details of Gridscope a. Please provide the differences in action function and purpose between Gridscope and EPD.	Gridscope is a distributed reactive real time sensor technology with sensors on approximately every other pole that detect conditions where equipment has failed including ground conditions, broken or leaning poles, vegetation, animal or foreign object in construction, and loss of power. b. PG&E is a distributed proactive sensor technology with sensors every few miles that detect equipment degradation in sensors, such as: deteriorating insulators, connections, line wires, insulators, degraded service transformers, and close vegetation	Joseph Mitchell	4/25/2025	4/30/2025	4/30/2025	https://www.pge.com/content/dam/pgc/forecasting-and-supply/2026-2028-mgdra_005_04.pdf	0	No	10	Situational Awareness and Forecasting	10.1.1
157	MGRA	005	MGRA_005	5	No	MORA_005_05	Weather MORA-5.6 Provide a list of the 17 worst weather days, along with a geographic limits associated with the designation (zip codes, counties, etc.) b. FFI c. Diabetic wind event classifier d. Associated meteorological analysis e. Any other notes or comments added by the meteorological team	a. The geographic limit associated with the worst weather days is based on the geographic domain of the PG&E service territory. b. Daily FFI 5.0 ratings by Fire Index Area (FIA) since 2008 are provided for the worst weather days at "WMP-Discovery2026-2028_DR_MGRA_005-Q003A0101.xlsx". c. The qualitative Diabetic wind event classifier is provided for the worst weather days through 2015 using an analysis described above. For 2020, we leveraged our "North-East" weather signal classification, which is a qualitative designation made by an operational meteorologist. "North-East" days are intended to capture Diabetic and events. d. The Diabetic wind event classifier is created based on the POMMS climatology at WMP-Discovery2026-2028_DR_MGRA_005-Q003A0202.xlsx". The Diabetic Event criteria is defined here as states where a wind direction between 300 and 112.3 degrees, wind speeds of 20 mph or greater, relative humidity of 25% or less and at least 225 or more POMMS 24hr gpd calls for at least 6 consecutive hours. These values were determined from a review of academic literature available. e. Catastrophic wildfires, defined here as those with a final fire size over 5,000 acres since 2012, are provided for the worst weather days at "WMP-Discovery2026-2028_DR_MGRA_005-Q003A0202.xlsx".	Joseph Mitchell	4/25/2025	4/30/2025	4/30/2025	https://www.pge.com/content/dam/pgc/forecasting-and-supply/2026-2028-mgdra_005_05.pdf	3	No	Appendix D	Appendix D: Areas of Continued Improvement	AO PG&E 238-03
158	OEIS	006	OEIS_006	1	No	OEIS_006_01	Regarding PSPS Impact In response to interested OEIS-P-WMP_2025-PG&E-001, Question 3, PG&E states that "The criteria for determining whether there is PSPS impact or not." Provide the following based on the CPZs in which there is PSPS impact: a. The percentage of total circuit mileage impacted b. The associated total circuit mileage impacted c. The percentage by total number of CPZs in the WPA d. The associated number of CPZs impacted	a. The geographic limit associated with the worst weather days is based on the geographic domain of the PG&E service territory. b. Daily FFI 5.0 ratings by Fire Index Area (FIA) since 2008 are provided for the worst weather days at "WMP-Discovery2026-2028_DR_MGRA_005-Q003A0101.xlsx". c. The qualitative Diabetic wind event classifier is provided for the worst weather days through 2015 using an analysis described above. For 2020, we leveraged our "North-East" weather signal classification, which is a qualitative designation made by an operational meteorologist. "North-East" days are intended to capture Diabetic and events. d. The Diabetic wind event classifier is created based on the POMMS climatology at WMP-Discovery2026-2028_DR_MGRA_005-Q003A0202.xlsx". The Diabetic Event criteria is defined here as states where a wind direction between 300 and 112.3 degrees, wind speeds of 20 mph or greater, relative humidity of 25% or less and at least 225 or more POMMS 24hr gpd calls for at least 6 consecutive hours. These values were determined from a review of academic literature available. e. Catastrophic wildfires, defined here as those with a final fire size over 5,000 acres since 2012, are provided for the worst weather days at "WMP-Discovery2026-2028_DR_MGRA_005-Q003A0202.xlsx".	Nathan Poon	4/25/2025	4/30/2025	4/30/2025	https://www.pge.com/content/dam/pgc/forecasting-and-supply/2026-2028-oeis_006_01.pdf	0	No	8	Grid Design, Operations, and Maintenance	8.2.1
159	OEIS	006	OEIS_006	2	No	OEIS_006_02	Regarding the Wildlife Risk Box Tie Figure PG&E-5.1.1-2 shows the risk box tie for wildlife risk on page 47 of the 2026-2028 Base WMP. a. Provide two colored versions of the figure for distribution-only risk and transmission-only risk. b. The figure shows that equipment/facility failure and vegetation contact make up 49% and 23% respectively, of the risk events per year based on frequency. However, it shows that both make up 10% of the risk. c. Provide the information used to determine the number of events per year within the figure. d. Provide a definition for what qualifies as an "event" within the figure (i.e. outage, lightning). e. Create the table below based on the frequency of risk event. Provide a detailed description of the factors that led to vegetation contact having a similar risk percentage to equipment/facility failures (i.e., proportionally higher consequence or probability accounting for the lower frequency).	a. Please see the figures below for the distribution- and transmission-only versions of Figure PG&E-5.1.1-2. Please note that the model used to generate Figure PG&E-5.1.1-2 includes 5 branches of data (Distribution-FFRA, Transmission-FFRA, Distribution-FFRA, and non-FFRA). These data include only include the distribution and transmission branches (including disaggregated distribution and transmission portions of the non-FFRA branch) and exclude the substation and substation branches. As a result, the sum of the events shown in the figure is not equal to the total number of events in the response. The aggregate sum of events in the model shown in Figure PG&E-5.1.1-2. b. Also note that PG&E determined that the "Exposure" values presented in Figure PG&E-5.1.1-2 in the 2026-2028 WMP have already been scaled. c. The correct aggregated Exposure value is 238,744 miles as of the date of the WMP filing. Please note that, for the response above, the sum of the distribution and transmission exposures in the figures provided in this response does not equal the aggregate exposure. d. The timeframe used to determine the number of events per year within the figure was from 2013-2024. e. The definition of "event" within the figure is defined as a PG&E-caused ignition. f. In general, areas with high probability of ignition from vegetation-related research and tank failures tend to be located in areas of high consequence, particularly foothills and lower mountain regions. Ignition probabilities for equipment failures tend to be more dispersed between areas of low and high consequence. The clustering of high vegetation ignition probabilities in high consequence areas results in higher average effective consequence and, therefore, higher risk for vegetation-related failures.	Nathan Poon	4/25/2025	4/30/2025	4/30/2025	https://www.pge.com/content/dam/pgc/forecasting-and-supply/2026-2028-oeis_006_02.pdf	0	No	5	Risk Methodology & Assessment	5.1.1
160	OEIS	006	OEIS_006	3	No	OEIS_006_03	Regarding Weather Model Validation a. Page 51 of the 2026-2028 Base WMP states that "The model uses PSPS guidance criteria to perform a back-and-forth 30-year climatological dataset." b. Provide documentation describing this climatological dataset. c. Provide a list of the variables compared within the dataset. d. Provide a detailed description of the validation performed on the dataset and results of the validation, as well as documentation of the technical steps to the operational weather modeling presented in https://www.pge.com/content/dam/pgc/forecasting-and-supply/2026-2028-oeis_006_03.pdf. e. Table 5.1 on page 61 of the 2026-2028 Base WMP includes a description of FFI and IPV models, stating that the weather model forecasts are "valid and well validated." f. Provide documentation describing these weather model forecasts. g. Provide a list of variables that these weather models forecast. h. Provide a detailed description of the validation performed on the weather model forecasts and results of the validation, as well as documentation of the technical steps to the operational weather modeling presented in https://www.pge.com/content/dam/pgc/forecasting-and-supply/2026-2028-oeis_006_03.pdf.	1. Documentation that describes the climatological dataset can be found at the source file. 2. The POMMS 3.3 Configuration Report provided as "WMP-Discovery2026-2028_DR_OEIS_005-Q003A0101.pdf". 3. Table 5.1 of the 2026-2028 Base WMP states that "The model uses PSPS guidance criteria to perform a back-and-forth 30-year climatological dataset." 4. For information on the Climate Forecast System Version 2 (CFSv2) Operational scenario, please reference this site: https://www.noaa.gov/media/releases/2015/gfsv2noaa.html 5. For information on the National Research and Forecasting model, please see: https://www.nmri.noaa.gov/efw/efw.html 6. The FFI model can be used to forecast model or global results (historical climatological data using global weather model training or climatological scenario, respectively). 7. For information on the Climate Forecast System Version 2 (CFSv2) Operational scenario, please reference this site: https://www.noaa.gov/media/releases/2015/gfsv2noaa.html 8. The list of variables available at the surface or near surface can be found in "WMP-Discovery2026-2028_DR_OEIS_005-Q003A0101.pdf". The list of variables that can be extracted from the 3D climatology and forecast dataset can be found in "WMP-Discovery2026-2028_DR_OEIS_005-Q003A0202.pdf". 9. Please see "WMP-Discovery2026-2028_DR_OEIS_005-Q003A0101.pdf" and "WMP-Discovery2026-2028_DR_OEIS_005-Q003A0202.pdf". 10. Documentation of the FFI and IPV models can be found in sections 3 and 4, respectively, of "WMP-Discovery2026-2028_DR_OEIS_005-Q003A0101.pdf". 11. Please see responses to b, c, d, e, and f.	Nathan Poon	4/25/2025	4/30/2025	4/30/2025	https://www.pge.com/content/dam/pgc/forecasting-and-supply/2026-2028-oeis_006_03.pdf	4	No	Appendix D	Appendix D: Areas of Continued Improvement	AO PG&E 238-03
161	OEIS	006	OEIS_006	4	No	OEIS_006_04	Regarding EPSS Risk On page 48 of the 2026-2028 Base WMP, PG&E states that the EPSS outage risk model "considers the fraction of failures that turn into sustained outages where EPSS is not enabled so that the baseline outage risk can be subtracted from the EPSS avoided risk." a. Provide the number of outages that are within that fraction, including the number of customer remedies interrupted associated with these outages. b. Provide the number of outages used prior to the removal of baseline outages discussed in part (a), including the associated customer remedy interrupted.	a. When EPSS is not enabled, roughly 85-90% of the outages are sustained and 10-15% are not sustained. The fraction of failures that turn into sustained outages where EPSS is not enabled so that the baseline outage risk can be subtracted from the EPSS avoided risk. b. The EPSS Outage Risk model does not use historical customer remedies interrupted when calculating the fraction of failures that turn into sustained outages where EPSS is not enabled so that the baseline outage risk can be subtracted from the EPSS avoided risk. c. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. d. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. e. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. f. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. g. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. h. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. i. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. j. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. k. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. l. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. m. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. n. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. o. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. p. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. q. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. r. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. s. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. t. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. u. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. v. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. w. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. x. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. y. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below. z. For outages that are within that fraction, including the number of customer remedies interrupted associated with these outages, please see the table below.	Nathan Poon	4/25/2025	5/14/2025	5/14/2025	https://www.pge.com/content/dam/pgc/forecasting-and-supply/2026-2028-oeis_006_04.pdf	0	No	Appendix D	Appendix D: Areas of Continued Improvement	AO PG&E 238-06

[illegible]

198	SPD	004	SPD_004	34	No	SPD_004_Q34	On page 125 in the 2020-2028 Base WMP, PG&E explains that when selecting a mitigation it considers relevant local factors into a case-by-case basis. a. Provide a list of local factors that PG&E considers when selecting a mitigation. b. Describe how the list of local factors was established by PG&E. c. Were any other factors considered in the process but removed from the final list? If so, explain why. d. Describe how each of these local factors can inform mitigation selection. e. Describe how each of these local factors are integrated into the decision trees found in Figures PG&E-3.1, PG&E-8.2, 1-2, and PG&E-8.1-3 in the 2020-2028 Base WMP. f. Which of the steps in the decision-tree reviews these local factors? How is that performed?	a. When a mitigation alternative is evaluated at the circuit segment level, all aspects of the decision tree are considered for the circuit segment. PG&E defines local factors (factors that are unique to the project location) to be the same as the qualitative factors that are used in the WMP 2020-2028 SPD, Q34, Q35 and Q36. b. PG&E defines local factors as "factors that are unique to the project location" (to be the same as the qualitative factors measurement and included below). The primary local factors considered when selecting a mitigation include items listed below, although the list of local factors was not strictly limited to these items. PG&E considers when selecting a mitigation, many other factors may be relevant. c. High-value potential, including an assessment of the current quantitative data provided by the regulation management team. d. Ingress/egress concerns and major historical fire data identified by the Public Safety Specialist (PSS). e. Construction management feasibility assessment, which accounts for local geology, including presence of hard rock, steep terrain, and water crossings. f. Environmental considerations, such as sensitive habitats. g. Cultural or historical considerations, such as tribal lands. h. Customer/industry impacts, such as significant construction in a neighborhood by PG&E or another utility, or land rights and permitting challenges. i. Public Safety Power Shutoff (PSPS) history in the area, assessed by reviewing the PSPS polygon data. The polygon data shows the area identified for each PSPS event in the baseline period that identifies which of the overhead assets will have required deenergization. j. PG&E's list of local factors was developed by participants in the cross-functional Scoping working groups who leverage their historical knowledge and local requirements. These participants offer feedback informed by their engagement with key stakeholders, such as agencies, cities, counties, tribes, and local communities, to ensure alignment with relevant local regulations and address local needs. This collective input helped shape the list, ensuring PG&E effectively addresses local considerations when selecting mitigation. k. No additional factors were considered for removal from the list. l. These local factors inform PG&E's mitigation selection at two key stages leading up to and during the scoping process: 1. When PG&E completes its initial Cost-Benefit Analysis (Figure 8.2-1-2), and a Circuit Protection Zone (CPZ) does not meet the Cost-Benefit Ratio (CBR) and Net Benefit requirements for an underpinning solution, PG&E initiates a higher analysis. As part of the higher analysis, PG&E considers local factors such as the above priorities, ingress/egress, water PSPS programs affecting the CPZ. PG&E continues the reevaluation of Overhead to Underground ratios until the CBR and Net Benefit requirements are met in some areas, the areas will result in a 100% more considered solution. 2. For example, a CPZ that is selected for a hybrid solution could have a section that has a high tree within risk and a significant ingress/egress concern. In the baseline high tree PG&E would select the number of miles to underground due to the above criteria, and the number of miles to underground due to ingress/egress concerns. This ratio will be selected based on the higher of the two ratios.	Eddie Schmidt	4/30/2025	5/1/2025	5/1/2025	https://www.pge.com/content/dam/pge/docs/2020-2028-Base-WMP/SPD/SPD_004_Q34.pdf	0	No	6	Wildfire Mitigation Strategy Development	6.1.3
199	SPD	004	SPD_004	35	No	SPD_004_Q35	On page 132 in the 2020-2028 Base WMP, PG&E states that it looks at its "highest risk circuit segments" to determine where to target the work included in the WMP. a. Define what "highest risk circuit segments" are, what aspects does PG&E consider in order to determine the timing of implementing mitigations on these "highest risk circuit segments"? b. Does PG&E consider the LURF and CURE values of these circuit segments when determining the timing of implementing mitigations on these "highest risk circuit segments"? If so, how? If not, why not?	a. PG&E is providing a response to the question for system hardening and undergrounding. PG&E selects system hardening and undergrounding based on the risk metric's ranking of the highest risk circuit segments. Other WMP programs reference the risk metric but focus on addressing the location where the specific risk is present. Circuit segments are selected for scoping from 1) based on ignition risk rank. Certain circuit segments may be excluded if, for example, they are already hardened, are primary service, are very short, or are already in a mitigation. PG&E generally prioritizes selection of projects in the same order that scoping is completed. Once a project has completed scoping and other pre-construction projects for excavation to ascending risk rank order based on the model used at the end of selection, while not necessarily the operational limitation noted in response to part a above. b. PG&E is providing a response to the question for system hardening and undergrounding. PG&E selects system hardening and undergrounding based on the risk metric's ranking of the highest risk circuit segments. Other WMP programs reference the risk metric but focus on addressing the location where the specific risk is present. Circuit segments are selected for scoping from 1) based on ignition risk rank. Certain circuit segments may be excluded if, for example, they are already hardened, are primary service, are very short, or are already in a mitigation. PG&E generally prioritizes selection of projects in the same order that scoping is completed. Once a project has completed scoping and other pre-construction projects for excavation to ascending risk rank order based on the model used at the end of selection, while not necessarily the operational limitation noted in response to part a above. c. PG&E is providing a response to the question for system hardening and undergrounding. PG&E selects system hardening and undergrounding based on the risk metric's ranking of the highest risk circuit segments. Other WMP programs reference the risk metric but focus on addressing the location where the specific risk is present. Circuit segments are selected for scoping from 1) based on ignition risk rank. Certain circuit segments may be excluded if, for example, they are already hardened, are primary service, are very short, or are already in a mitigation. PG&E generally prioritizes selection of projects in the same order that scoping is completed. Once a project has completed scoping and other pre-construction projects for excavation to ascending risk rank order based on the model used at the end of selection, while not necessarily the operational limitation noted in response to part a above.	Eddie Schmidt	4/30/2025	5/1/2025	5/1/2025	https://www.pge.com/content/dam/pge/docs/2020-2028-Base-WMP/SPD/SPD_004_Q35.pdf	0	No	5	Risk Methodology & Assessment	5.5.2
200	SPD	004	SPD_004	36	No	SPD_004_Q36	Throughout the 2020-2028 Base WMP, PG&E uses the terms system hardening, grid hardening, and resiliency mitigation activities to describe the same category of mitigations, namely undergrounding, covered conductor, and distribution line removal. Explain why PG&E uses these three different terms for this category of mitigations. a. Are there differences between these terms? If so, explain.	Resiliency Mitigation describes one of the four categories of mitigations that support PG&E's foundational framework of risk information decision-making designed to improve system risk and outage impacts. PG&E's system resilience activities are critical to permanently reducing wildfire risk, minimizing negative aspects of PSPS and EPSS, and strengthening the grid against extreme weather events (p. 6). System Resiliency describes mitigations designed to reduce system risk by changing how PG&E gets a constructed and operated (2020-2028 Base WMP, p. 20). Resiliency Mitigation describes a broader category of mitigations than just system hardening. While Resiliency Mitigation includes system hardening activities (undergrounding, distribution covered conductor, distribution line removal), it also includes other system hardening mitigations, such as distribution pole replacement and reinforcement and CPD/CPG/CPG-1000 mitigation (Distribution 2020-2028 Base WMP, p. 20, p. 21, p. 22, p. 23). System Hardening describes measures designed to reduce system hardening activities: 1. Covered conductor (CC) installation and line removal, including remote grids (CG-12) and 2. Distribution undergrounding (DG-04). Grid Hardening WMP Section 8.2 is called "Grid Hardening". PG&E uses the term "grid hardening" in its Section 8.2 similar to the term in the WMP Section 8.2 as specified by Energy Safety in its 2020-2028 WMP Guidelines. In PG&E's Section 8.2 manual, it states that grid hardening projects include undergrounding (p. 340). The term is also specified by Energy Safety in its Continuous Improvement (CI) (PG&E-2014-2), Continuous Improvement (CI) Studies, or PG&E uses the term in its response to the AC. a. While grid hardening and system hardening are basically synonymous, the key distinction among these terms PG&E uses in the WMP is that Resiliency Mitigation refers to a broader category of mitigations than just grid hardening or system hardening.	Eddie Schmidt	4/30/2025	5/6/2025	5/6/2025	https://www.pge.com/content/dam/pge/docs/2020-2028-Base-WMP/SPD/SPD_004_Q36.pdf	0	No	8	Grid Design, Operations, and Maintenance	8
201	SPD	004	SPD_004	37	No	SPD_004_Q37	On page 138 in the 2020-2028 Base WMP, PG&E states "Over time, undergrounding also has lower operations and maintenance expenses." Provide documentation that corroborates this statement. a. What is the time scale of the analysis that led to this statement? Why was that timeframe used? b. How would the results of the analysis be different if an alternative time scale was used? Consider the possible results of the analysis if the following time scales were used: 1. Annual. 2. Decadal. 3. Multi-decadal (this must include the decommissioning and replacement costs).	a. PG&E recognizes that the term "time scale" in the question could be interpreted in multiple ways. For example, we address two possible interpretations: (1) the timeframes of the data used to develop the analysis and (2) the timeframe associated with the application of the results of the analysis. 1) The average annual cost considers between 1 to 5 years of historical or forecast data for the O&M activity. The timeframe considered in the underlying data very due to the availability of data for each of the O&M cost types (e.g., some cost types require many historical costs, whereas other cost types are based on the 2023-2028 GHG forecast). Undergrounding can reduce some O&M costs, such as routine maintenance, vegetation management costs, patrols and inspections, Enhanced Power Safety Settings (EPSS) and Public Safety Power Shutoffs (PSPS). 2) The time scale of the analysis that led to this statement is one year. This statement is based on an expected average annual cost per mile for operations and maintenance (O&M) activities. The assumption is that the average annual cost per mile would be applicable for the useful life of the asset (i.e., 35 years for undergrounding). Please see "WMP Discussion/2020-2028_O&M_SPD_004-Q37/Tab01" which outlines examples of expected O&M costs as an average annual cost for miles of undergrounding primary lines compared to an unmitigated baseline scenario. The lower operations and maintenance costs are assumed to be relative to a hypothetical baseline assumption for the cost of operations and maintenance for an unmitigated mile in the current system. As a result of system is undergrounded, the average annual avoided costs will increase. This consideration of avoided costs to long-term benefits. Further information on the cost assumptions and underlying data will be included in the final WMP (Benefit) Cost Impact (BICI). b. The total O&M avoided costs are not affected by the time period considered. 1) It is assumed that any avoided costs are an average annual cost per mile basis and would not be significantly impacted by the time scale considered. 2) It is assumed that any avoided costs are an average annual cost per mile basis and would not be significantly impacted by the time scale considered. 3) It is assumed that any avoided costs are an average annual cost per mile basis and would not be significantly impacted by the time scale considered.	Eddie Schmidt	4/30/2025	5/6/2025	5/6/2025	https://www.pge.com/content/dam/pge/docs/2020-2028-Base-WMP/SPD/SPD_004_Q37.pdf	1	No	8	Grid Design, Operations, and Maintenance	8.2.2
202	SPD	004	SPD_004	38	No	SPD_004_Q38	On page 138 in the 2020-2028 Base WMP, PG&E states "For many of the mitigation programs, wildfire risk is the primary driver of prioritization." List the mitigation programs where wildfire risk is not the primary driver of prioritization. a. For each mitigation program in the list, explain what is the primary driver of prioritization. b. For Table 6-3 in the 2020-2028 Base WMP, PG&E provided an "Activity-Effectiveness-Wildfire Risk" value for each activity listed. However, for six of these activities PG&E did not provide Cost-Benefit Ratios (3). c. Provide the Cost-Benefit Ratios for each of these activities as is required by 2-22-12/2027. d. If these calculations of CBR vary from what was submitted in PG&E's 2024 RAMP Application, explain how much they vary and why. e. Complete Table 6-3 for all activities listed in the WMP. Add the Initiative Activity Tracking (3) as a column in the completed Table. Present the completed version of Table 6-3 as an Excel spreadsheet.	Wildfire risk is a primary driver of prioritization for all of PG&E's mitigation programs. On page 138 of the 2020-2028 Base WMP, PG&E explains that it also considers wildfire risk when prioritizing mitigation programs pursuant to the requirements of Senate Bill 88. As such, certain mitigation programs may have wildfire risk as a driver for prioritization as well as wildfire risk, but there are no mitigation programs for which wildfire risk is not a primary driver of prioritization. Please see, for example, Table 5-3 in the 2020-2028 Base WMP and the column titled "Fire Risk Contribution." The following table uses 2020-2028 Program Cost-Benefit Ratios (CBR) values (unless otherwise noted) from the enterprise risk models and investment planning forecasts to be submitted as part of May 2027 GHG filing. The bus transmission programs (conductor support replacement and short span installation) cost benefit scores are currently unavailable and will be provided later. The table below compares the RAMP CBRs and CBRs provided in subject (a). The original CBR submitted in Table 5-3 are presented in subject (a) as from PG&E's final decision and analysis to be submitted in our May filing of the 2027 GHG filing. The values presented in subject (a) are from PG&E's final decision and analysis to be submitted in our May filing of the 2027 GHG filing. The values presented in subject (a) are from PG&E's final decision and analysis to be submitted in our May filing of the 2027 GHG filing. Reduction driven by higher percentage of pole work that has a lower CBR value when compared to re-locate capital and expense (a). Programs for 2027 GHG: 1) Increase driven by a lower estimated cost of work and reflected outage to ignition risk when compared to RAMP filing (a). 2) Risk Reduction from RAMP to GHG is lower while costs increased relatively the same (a). 3) Increase driven by the inclusion of secondary and service mile scope (a). 4) Reduction driven by the increase in allocated costs tied to PSPS (a). 5) Reduction driven by lower EPSS effectiveness (a).	Eddie Schmidt	4/30/2025	5/1/2025	5/1/2025	https://www.pge.com/content/dam/pge/docs/2020-2028-Base-WMP/SPD/SPD_004_Q38.pdf	0	No	5	Risk Methodology & Assessment	5
203	SPD	004	SPD_004	39	No	SPD_004_Q39	On page 138 in the 2020-2028 Base WMP, PG&E states "For many of the mitigation programs, wildfire risk is the primary driver of prioritization." List the mitigation programs where wildfire risk is not the primary driver of prioritization. a. For each mitigation program in the list, explain what is the primary driver of prioritization. b. For Table 6-3 in the 2020-2028 Base WMP, PG&E provided an "Activity-Effectiveness-Wildfire Risk" value for each activity listed. However, for six of these activities PG&E did not provide Cost-Benefit Ratios (3). c. Provide the Cost-Benefit Ratios for each of these activities as is required by 2-22-12/2027. d. If these calculations of CBR vary from what was submitted in PG&E's 2024 RAMP Application, explain how much they vary and why. e. Complete Table 6-3 for all activities listed in the WMP. Add the Initiative Activity Tracking (3) as a column in the completed Table. Present the completed version of Table 6-3 as an Excel spreadsheet.	Wildfire risk is a primary driver of prioritization for all of PG&E's mitigation programs. On page 138 of the 2020-2028 Base WMP, PG&E explains that it also considers wildfire risk when prioritizing mitigation programs pursuant to the requirements of Senate Bill 88. As such, certain mitigation programs may have wildfire risk as a driver for prioritization as well as wildfire risk, but there are no mitigation programs for which wildfire risk is not a primary driver of prioritization. Please see, for example, Table 5-3 in the 2020-2028 Base WMP and the column titled "Fire Risk Contribution." The following table uses 2020-2028 Program Cost-Benefit Ratios (CBR) values (unless otherwise noted) from the enterprise risk models and investment planning forecasts to be submitted as part of May 2027 GHG filing. The bus transmission programs (conductor support replacement and short span installation) cost benefit scores are currently unavailable and will be provided later. The table below compares the RAMP CBRs and CBRs provided in subject (a). The original CBR submitted in Table 5-3 are presented in subject (a) as from PG&E's final decision and analysis to be submitted in our May filing of the 2027 GHG filing. The values presented in subject (a) are from PG&E's final decision and analysis to be submitted in our May filing of the 2027 GHG filing. The values presented in subject (a) are from PG&E's final decision and analysis to be submitted in our May filing of the 2027 GHG filing. Reduction driven by higher percentage of pole work that has a lower CBR value when compared to re-locate capital and expense (a). Programs for 2027 GHG: 1) Increase driven by a lower estimated cost of work and reflected outage to ignition risk when compared to RAMP filing (a). 2) Risk Reduction from RAMP to GHG is lower while costs increased relatively the same (a). 3) Increase driven by the inclusion of secondary and service mile scope (a). 4) Reduction driven by the increase in allocated costs tied to PSPS (a). 5) Reduction driven by lower EPSS effectiveness (a).	Eddie Schmidt	4/30/2025	5/1/2025	5/1/2025	https://www.pge.com/content/dam/pge/docs/2020-2028-Base-WMP/SPD/SPD_004_Q39.pdf	0	No	6	Wildfire Mitigation Strategy Development	6

245	SPO	006	SPO_006	4	No	SPO_006_04	In response to SPO-004 Question 27, PG&E states "Cost-related feasibility factors are incorporated into cost assumptions as a quantifiable cost modifier, when they are included in the estimate and cost of the proposed construction". a. Provide the quantifiable cost modifier for each of the seven "primary examples of feasibility constraints" listed in Question 27. b. Explain how PG&E determined the value for each of the quantifiable cost modifiers listed in Question 27.	Eddie Schmitt	5/1/2025	6/2/2025	6/2/2025	https://www.pge.com/assets/pge/docs/tables-and-figures/feasibility-constraints-and-assessments/2025-SPO_006_04.pdf	1	No	8	Grid Design, Operations, and Maintenance	8.2.1
246	SPO	006	SPO_006	5	No	SPO_006_05	In a meeting on May 9th to discuss the Wildlife Benefit Cost Analysis (WBCA) Tool, SPO understood from PG&E that a limited number of circuit segments had been evaluated against the System Hardening Project Scoping Decision Tree and Process found in Figure PG&E 8.2.1-1, PG&E 8.2.1-2 and PG&E 8.2.1-3 in the 2025-2028 Base WMP. Per page 182 of the 2025-2028 WMP SPO understands that the decision trees will inform mitigation selection beginning in 2027. a. Provide the total number of circuit segments where PG&E has already applied the decision tree for mitigation work in 2027 and 2028. b. Provide the total number of circuit segments where PG&E intends to apply the decision tree for work done in 2027 and 2028.	Eddie Schmitt	5/1/2025	6/2/2025	6/2/2025	https://www.pge.com/assets/pge/docs/tables-and-figures/feasibility-constraints-and-assessments/2025-SPO_006_05.pdf	0	No	3	Overview of WMP	3.6
247	SPO	006	SPO_006	6	No	SPO_006_06	In a meeting on May 9th to discuss the Wildlife Benefit Cost Analysis (WBCA) Tool, PG&E informed SPO that the baseline value of risk used to calculate CBR is affected by the 2024 RAMP and the WBCA Tool. a. Provide a detailed step by step explanation of how CBR is calculated for the 2024 RAMP and WBCA Tool. The actual value, an example with a table that is similar to Table PG&E 8.2.1-2 in the 2025-2028 Base WMP but that includes additional inputs to the WBCA tool. b. In the narrative answer to the question highlight the differences in the baseline value of risk used in each approach. Explain any other differences.	Eddie Schmitt	5/1/2025	5/22/2025	5/22/2025	https://www.pge.com/assets/pge/docs/tables-and-figures/feasibility-constraints-and-assessments/2025-SPO_006_06.pdf	0	No	3	Overview of WMP	3.6
247	SPO	006	SPO_006	6(a)	Yes	SPO_006_06(a)	In a meeting on May 9th to discuss the Wildlife Benefit Cost Analysis (WBCA) Tool, PG&E informed SPO that the baseline value of risk used to calculate CBR is affected by the 2024 RAMP and the WBCA Tool. a. Provide a detailed step by step explanation of how CBR is calculated for the 2024 RAMP and WBCA Tool. The actual value, an example with a table that is similar to Table PG&E 8.2.1-2 in the 2025-2028 Base WMP but that includes additional inputs to the WBCA tool. b. In the narrative answer to the question highlight the differences in the baseline value of risk used in each approach. Explain any other differences. c. Explain why PG&E decided to use a baseline value of risk to calculate the CBR in the WBCA Tool that was in SPO-006-06(a)-07 Question 16. PG&E stated that the WBCA model uses Capital Costs, O&M Costs, and risk reduction inputs to evaluate alternative mitigation at the circuit segment-level. In SPO-006-06(a)-07 Question 16, PG&E also stated that the "key evaluation metrics of the WBCA model are the CBR and Net Benefit for each circuit segment for certain system hardening mitigation alternatives." In Figure PG&E 8.2.1-1, CBR and Net Benefit are necessary to determine which mitigation is selected for the circuit segment. d. In the 2025-2028 Base WMP PG&E states that the system hardening mitigation of a given CPE, Explain whether or not this means that PG&E must have Capital Costs, O&M Costs and risk reduction inputs at the circuit segment level. PG&E states that the system hardening mitigation will be selected at a given CPE. Regarding Errors for Proposed Expenditures On April 16, 2025, PG&E submitted substantive errors for the 2025-2028 Base WMP. On May 16, 2025, PG&E submitted non-substantive errors for the 2025-2028 Base WMP. In both cases, PG&E made updates to Table 3-3, Summary of Proposed WMP Expenditures and stated the updates were made "to better forecast alignment with existing General Rate Case." a. Explain the forecast refinements that were made for the April 16, 2025, errors. Regarding Transmission Right-of-Way Maintenance In the 2025-2028 WMP, Section 9.7.3 TM Maintaining, PG&E states that, "For TWRM, previously selected ROWs are reassessed every 20 years (p. 385). In response to data request, O&E-P-RAMP, 2025-PAGE-001, question 16, PG&E stated "With the availability of LEARN data, vegetation height and density conditions are assessed each year." On page 385, PG&E references Utility Standard TD 11118 in its section "Annual 'Forest Plan' the relevant data for work plans are created annually" and references that "ROWs are reassessed every 20 years." In the same standard, PG&E states, "Thresholds for implementing TWRM are considered when incompatible vegetation exceeds 3 feet in height or exceeds 50% ground coverage within the managed area."	Eddie Schmitt	5/1/2025	5/28/2025	5/28/2025	https://www.pge.com/assets/pge/docs/tables-and-figures/feasibility-constraints-and-assessments/2025-SPO_006_06(a).pdf	1	No	3	Overview of WMP	3.6
248	SPO	006	SPO_006	7	No	SPO_006_07	PG&E has developed estimated O&M expenditures at the circuit segment-level as an input to the WBCA model for system hardening mitigation, including undergrounding, overhead hardening, and storm pilots to account for ongoing RAMP-Compliance-CPE, DR, SPO, DR-CPE Page 2. PG&E has developed estimated O&M expenditures at the circuit segment-level as an input to the WBCA model for system hardening mitigation, including undergrounding, overhead hardening, and storm pilots to account for ongoing RAMP-Compliance-CPE, DR, SPO, DR-CPE Page 2.	Eddie Schmitt	5/1/2025	5/22/2025	5/22/2025	https://www.pge.com/assets/pge/docs/tables-and-figures/feasibility-constraints-and-assessments/2025-SPO_006_07.pdf	0	No	3	Overview of WMP	3.6
249	O&EIS	012	O&EIS_012	1	No	O&EIS_012_01	Regarding Errors for Proposed Expenditures On April 16, 2025, PG&E submitted substantive errors for the 2025-2028 Base WMP. On May 16, 2025, PG&E submitted non-substantive errors for the 2025-2028 Base WMP. In both cases, PG&E made updates to Table 3-3, Summary of Proposed WMP Expenditures and stated the updates were made "to better forecast alignment with existing General Rate Case." a. Explain the forecast refinements that were made for the April 16, 2025, errors. Regarding Transmission Right-of-Way Maintenance In the 2025-2028 WMP, Section 9.7.3 TM Maintaining, PG&E states that, "For TWRM, previously selected ROWs are reassessed every 20 years (p. 385). In response to data request, O&E-P-RAMP, 2025-PAGE-001, question 16, PG&E stated "With the availability of LEARN data, vegetation height and density conditions are assessed each year." On page 385, PG&E references Utility Standard TD 11118 in its section "Annual 'Forest Plan' the relevant data for work plans are created annually" and references that "ROWs are reassessed every 20 years." In the same standard, PG&E states, "Thresholds for implementing TWRM are considered when incompatible vegetation exceeds 3 feet in height or exceeds 50% ground coverage within the managed area."	Nathan Potts	5/23/2025	6/5/2025	5/29/2025	https://www.pge.com/assets/pge/docs/tables-and-figures/feasibility-constraints-and-assessments/2025-SPO_006_07(a).pdf	1	No	3	Overview of WMP	3.6
250	O&EIS	012	O&EIS_012	2	No	O&EIS_012_02	PG&E has developed estimated O&M expenditures at the circuit segment-level as an input to the WBCA model for system hardening mitigation, including undergrounding, overhead hardening, and storm pilots to account for ongoing RAMP-Compliance-CPE, DR, SPO, DR-CPE Page 2. PG&E has developed estimated O&M expenditures at the circuit segment-level as an input to the WBCA model for system hardening mitigation, including undergrounding, overhead hardening, and storm pilots to account for ongoing RAMP-Compliance-CPE, DR, SPO, DR-CPE Page 2.	Nathan Potts	5/23/2025	5/29/2025	5/29/2025	https://www.pge.com/assets/pge/docs/tables-and-figures/feasibility-constraints-and-assessments/2025-SPO_006_07(b).pdf	0	No	9	Inspection Management and Inspection	9
251	O&EIS	012	O&EIS_012	3	No	O&EIS_012_03	O&EIS, Regarding Table 6-4 In response to data request O&EIS-WMP-2025-PAGE-006, question 2, subpart (b), PG&E provided an updated version of Table 6-4 from its 2025-2028 Base WMP that included risk density. a. Provide a new version of Table 6-4 with an updated risk rating of circuit segments based on risk per mile, as used for prioritization of projects. The circuit segments within the new table should not be the same as those currently within Table 6-4, which are ranked based on overall risk scores. The updated table should include the following additional columns: 2025 planned undergrounding (circuit mileage) 2027 planned undergrounding (circuit mileage) 2028 planned undergrounding (circuit mileage) 2029 planned covered conductor (circuit mileage) 2030 planned covered conductor (circuit mileage) 2031 planned covered conductor (circuit mileage) 2032 planned covered conductor (circuit mileage) 2033 planned covered conductor (circuit mileage) 2034 planned covered conductor (circuit mileage) 2035 planned covered conductor (circuit mileage) 2036 planned covered conductor (circuit mileage) 2037 planned covered conductor (circuit mileage) 2038 planned covered conductor (circuit mileage) 2039 planned covered conductor (circuit mileage) 2040 planned covered conductor (circuit mileage) 2041 planned covered conductor (circuit mileage) 2042 planned covered conductor (circuit mileage) 2043 planned covered conductor (circuit mileage) 2044 planned covered conductor (circuit mileage) 2045 planned covered conductor (circuit mileage) 2046 planned covered conductor (circuit mileage) 2047 planned covered conductor (circuit mileage) 2048 planned covered conductor (circuit mileage) 2049 planned covered conductor (circuit mileage) 2050 planned covered conductor (circuit mileage) 2051 planned covered conductor (circuit mileage) 2052 planned covered conductor (circuit mileage) 2053 planned covered conductor (circuit mileage) 2054 planned covered conductor (circuit mileage) 2055 planned covered conductor (circuit mileage) 2056 planned covered conductor (circuit mileage) 2057 planned covered conductor (circuit mileage) 2058 planned covered conductor (circuit mileage) 2059 planned covered conductor (circuit mileage) 2060 planned covered conductor (circuit mileage) 2061 planned covered conductor (circuit mileage) 2062 planned covered conductor (circuit mileage) 2063 planned covered conductor (circuit mileage) 2064 planned covered conductor (circuit mileage) 2065 planned covered conductor (circuit mileage) 2066 planned covered conductor (circuit mileage) 2067 planned covered conductor (circuit mileage) 2068 planned covered conductor (circuit mileage) 2069 planned covered conductor (circuit mileage) 2070 planned covered conductor (circuit mileage) 2071 planned covered conductor (circuit mileage) 2072 planned covered conductor (circuit mileage) 2073 planned covered conductor (circuit mileage) 2074 planned covered conductor (circuit mileage) 2075 planned covered conductor (circuit mileage) 2076 planned covered conductor (circuit mileage) 2077 planned covered conductor (circuit mileage) 2078 planned covered conductor (circuit mileage) 2079 planned covered conductor (circuit mileage) 2080 planned covered conductor (circuit mileage) 2081 planned covered conductor (circuit mileage) 2082 planned covered conductor (circuit mileage) 2083 planned covered conductor (circuit mileage) 2084 planned covered conductor (circuit mileage) 2085 planned covered conductor (circuit mileage) 2086 planned covered conductor (circuit mileage) 2087 planned covered conductor (circuit mileage) 2088 planned covered conductor (circuit mileage) 2089 planned covered conductor (circuit mileage) 2090 planned covered conductor (circuit mileage) 2091 planned covered conductor (circuit mileage) 2092 planned covered conductor (circuit mileage) 2093 planned covered conductor (circuit mileage) 2094 planned covered conductor (circuit mileage) 2095 planned covered conductor (circuit mileage) 2096 planned covered conductor (circuit mileage) 2097 planned covered conductor (circuit mileage) 2098 planned covered conductor (circuit mileage) 2099 planned covered conductor (circuit mileage) 2100 planned covered conductor (circuit mileage)	Nathan Potts	5/23/2025	6/5/2025	6/5/2025	https://www.pge.com/assets/pge/docs/tables-and-figures/feasibility-constraints-and-assessments/2025-SPO_006_07(c).pdf	1	No	5		
252	SPO	007	SPO_007	1	No	SPO_007_01	PG&E has developed estimated O&M expenditures at the circuit segment-level as an input to the WBCA model for system hardening mitigation, including undergrounding, overhead hardening, and storm pilots to account for ongoing RAMP-Compliance-CPE, DR, SPO, DR-CPE Page 2. PG&E has developed estimated O&M expenditures at the circuit segment-level as an input to the WBCA model for system hardening mitigation, including undergrounding, overhead hardening, and storm pilots to account for ongoing RAMP-Compliance-CPE, DR, SPO, DR-CPE Page 2.	Eddie Schmitt	6/2/2025	6/12/2025	6/12/2025	https://www.pge.com/assets/pge/docs/tables-and-figures/feasibility-constraints-and-assessments/2025-SPO_007_01.pdf	0	No	5	Risk Methodology & Assessment	5.4
253	SPO	007	SPO_007	2	No	SPO_007_02	PG&E has developed estimated O&M expenditures at the circuit segment-level as an input to the WBCA model for system hardening mitigation, including undergrounding, overhead hardening, and storm pilots to account for ongoing RAMP-Compliance-CPE, DR, SPO, DR-CPE Page 2. PG&E has developed estimated O&M expenditures at the circuit segment-level as an input to the WBCA model for system hardening mitigation, including undergrounding, overhead hardening, and storm pilots to account for ongoing RAMP-Compliance-CPE, DR, SPO, DR-CPE Page 2.	Eddie Schmitt	6/2/2025	6/5/2025	6/5/2025	https://www.pge.com/assets/pge/docs/tables-and-figures/feasibility-constraints-and-assessments/2025-SPO_007_02.pdf	0	Yes	5	Risk Methodology & Assessment	5.4
254	SPO	007	SPO_007	3	No	SPO_007_03	PG&E has developed estimated O&M expenditures at the circuit segment-level as an input to the WBCA model for system hardening mitigation, including undergrounding, overhead hardening, and storm pilots to account for ongoing RAMP-Compliance-CPE, DR, SPO, DR-CPE Page 2. PG&E has developed estimated O&M expenditures at the circuit segment-level as an input to the WBCA model for system hardening mitigation, including undergrounding, overhead hardening, and storm pilots to account for ongoing RAMP-Compliance-CPE, DR, SPO, DR-CPE Page 2.	Eddie Schmitt	6/2/2025	6/5/2025	6/5/2025	https://www.pge.com/assets/pge/docs/tables-and-figures/feasibility-constraints-and-assessments/2025-SPO_007_03.pdf	0	Yes	6	Wildlife Mitigation Strategy Development	6.1.3.1
255	SPO	007	SPO_007	4	No	SPO_007_04	PG&E has developed estimated O&M expenditures at the circuit segment-level as an input to the WBCA model for system hardening mitigation, including undergrounding, overhead hardening, and storm pilots to account for ongoing RAMP-Compliance-CPE, DR, SPO, DR-CPE Page 2. PG&E has developed estimated O&M expenditures at the circuit segment-level as an input to the WBCA model for system hardening mitigation, including undergrounding, overhead hardening, and storm pilots to account for ongoing RAMP-Compliance-CPE, DR, SPO, DR-CPE Page 2.	Eddie Schmitt	6/2/2025	6/5/2025	6/5/2025	https://www.pge.com/assets/pge/docs/tables-and-figures/feasibility-constraints-and-assessments/2025-SPO_007_04.pdf	0	Yes	8	Grid Design, Operations, and Maintenance	8.3.11

