

Count	Party Name	Doc Set	Date Requested	Question No.	Response	Question ID	Question Text	Response	Requester	Date Received	Final Date	Date Sent	Links	Number of Attach	RIA Required	2025 WMP Section	Category	Subcategory	
1	TURN	002	TURN_002	1	No	TURN_002_01	Section 5.2.1, page 57 states, "Starting in January 2023, PG&E incorporated additional customers who could be impacted into the PPSB consequence model and classified them as Potentially Impacted Customers (PIC)." a. How were the PIC selected? b. How were they initially identified? c. What types of consequences do they have that were not included in the 12-year customer baseline? d. Please explain the basis for PG&E's belief that not every customer who could experience a PPSB event is captured in the historical baseline? e. Regarding the statement on page 57 that "This enables the calculation of roughly double the potentially-affected local customers ...", please provide the specific date on which this statement is based.	Please note that PG&E no longer accounts for Potentially Impacted Customers (PICs) in its PPSB consequence model due to the low incremental risk values associated with customers that were not included in our baseline. Thus, the statement on page 57 of the 2025-2028 WMP is a historical in nature. A. The selection criteria for PICs were created by using our distribution planning models under the scenario of "what if" every distribution line in HFTD/HFRA is required to be de-energized. f. Potentially impacted customers (i.e., all customers who would be impacted by the theoretical de-energization of every HFTD/HFRA distribution line) were identified through our distribution planning models. WMP-Discovery 2025-2028, DR_TURN_002-001 Page 2 g. The inclusion of PICs results in increased risk associated with customers in locations where PPSB thresholds were not met in our historical baseline, but have exposure to PPSB risk based on HFTD/HFRA location and system configuration. This evaluation does not include the addition of new consequences. h. The meaning behind this statement is that this is a low probability event, and the intent was to assign risk exposure to customers that are not accounted for in PG&E's traditional baseline. This is because our baseline is based on historical weather conditions that have met PPSB thresholds to initiate a PPSB event. This is not to say that locations in HFTD that have never met PPSB thresholds could not see an event in the future. i. This statement is based on the fact that all customers that would be impacted by the theoretical de-energization of every HFTD/HFRA distribution line, minus the critical infrastructure customers, are included in our baseline.	A Miele Full-Fy	4/7/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/2025/04/09/turn_002_001.pdf https://www.pge.com/assets/2025/04/09/turn_002_002.pdf	0	No		5	Risk Methodology & Assessment	5.2.1
2	TURN	002	TURN_002	2	No	TURN_002_02	Section 5.2.1 page 63 provides the formula for PPSB likelihood. Please explain why 5 years were selected as the denominator?	PG&E's likelihood is used to estimate PPSB consequence and includes 2018-2022 data (5 years). This is to align with the initiation and execution of PPSB events in 2018. PG&E's enterprise risk model also includes an additional 2 years of data (2023-2024) that was not included in the existing baseline due to the availability of data not being available at the time of the analysis. To address this data gap, PG&E used actual PPSB events but determined the customer impact by de-energizing the upstream blocks as it would be expected that the customer would be re-energized. PG&E objects to the request of a combined, range, ambiguous, and only, boundaries. It is not possible to identify every single criterion that PG&E could use in evaluating the feasibility of a project. Additionally, and without without this objection, PG&E responds as follows: The feasibility of installing underground infrastructure can vary significantly across PG&E's service area, and therefore, the specific circumstances and facts must be evaluated for each case. Certain conditions may necessitate overhead hardening instead of undergrounding due to feasibility constraints. These conditions may include, but are not limited to: • Culturally Restricted Areas: Locations where underground installation may not be permitted due to cultural or historical considerations. • Geographical Challenges: Situations such as large water crossings where bridge attachments are not possible or large canyon crossings where no reasonable underground path exists. • Legal and Land Use Constraints: Liability to acquire the necessary easements or rights to install underground infrastructure. WMP-Discovery 2025-2028, DR_TURN_002-003 Page 2	A Miele Full-Fy	4/7/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/2025/04/09/turn_002_003.pdf https://www.pge.com/assets/2025/04/09/turn_002_004.pdf	0	No		5	Risk Methodology & Assessment	5.2.1
3	TURN	002	TURN_002	3	No	TURN_002_03	Section 6.1.2, page 116 states that, instead of undergrounding, "in certain circumstances we may choose to overhead harden a circuit segment or portion of a circuit segment because of feasibility constraints." Please identify and explain each and every criterion that PG&E would use to determine that feasibility constraints have reached the point that PG&E would choose overhead hardening over undergrounding and how PG&E would decide, based on these criteria, that overhead hardening is the best choice.	PG&E objects to the request of a combined, range, ambiguous, and only, boundaries. It is not possible to identify every single criterion that PG&E could use in evaluating the feasibility of a project. Additionally, and without without this objection, PG&E responds as follows: The feasibility of installing underground infrastructure can vary significantly across PG&E's service area, and therefore, the specific circumstances and facts must be evaluated for each case. Certain conditions may necessitate overhead hardening instead of undergrounding due to feasibility constraints. These conditions may include, but are not limited to: • Culturally Restricted Areas: Locations where underground installation may not be permitted due to cultural or historical considerations. • Geographical Challenges: Situations such as large water crossings where bridge attachments are not possible or large canyon crossings where no reasonable underground path exists. • Legal and Land Use Constraints: Liability to acquire the necessary easements or rights to install underground infrastructure. WMP-Discovery 2025-2028, DR_TURN_002-003 Page 2	A Miele Full-Fy	4/7/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/2025/04/09/turn_002_005.pdf https://www.pge.com/assets/2025/04/09/turn_002_006.pdf	0	No		6	Wildfire Mitigation Strategy Development	6.1.2
4	TURN	002	TURN_002	4	No	TURN_002_04	Section 6.1.3.1, page 120, states, "While undergrounding is PG&E's preferred solution for mitigating ignition risk in the highest risk areas, we recognize that undergrounding takes longer to execute than overhead hardening and is a more costly investment in the short term." [and] "Overhead conductor can generally be installed more quickly and costs less than undergrounding, but does not protect against tree strike risk or fully address the reliability benefit and constraints that undergrounding, where feasible, is the best alternative where tree strike risk is high." This conclusion does not address the information provided in Table 6.1.3.1 on page 128. Please explain why the cost and timing of undergrounding, which the table provides has a 90-95% average effectiveness, is preferred to the combination of overhead conductor, EPSS, and PPSB, which the table provides has a 97% average effectiveness.	This chapter has been reviewed and addressed. On page 128, we noted that "the combination of overhead conductor, EPSS, and PPSB introduces a high likelihood of system outage risk and is disruptive to customers." "As a result, more fully described in Section 6.1.3.2 (pg. 134-135) and in PG&E's 2025 WMP Update, ACJ 25-05 (pg. 55-57), PG&E recognizes that overhead hardening can be installed more quickly than undergrounding solution, however, the initial risk reduction achieved from earlier installation of overhead mitigation does not compensate for the greater total, more permanent risk reduction achieved over the lifetime of an undergrounded installation. Undergrounding is preferred to the combination of overhead conductor, EPSS, and PPSB because it more effectively reduces risk. We expect undergrounding to reduce reliability risk and the need to operate and maintain overhead equipment and clearing vegetation around the overhead facilities. PG&E's intent is to significantly reduce reliability impacts of ignition potential and to offer the most permanent solution to the wildfire risk.	A Miele Full-Fy	4/7/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/2025/04/09/turn_002_007.pdf https://www.pge.com/assets/2025/04/09/turn_002_008.pdf	0	No		6	Wildfire Mitigation Strategy Development	6.1.3.1
5	TURN	002	TURN_002	5	No	TURN_002_05	Regarding Table PG&E 6.1.3.1 on page 128, please provide the "Best Available" values for the "Bent-Average Effectiveness" values for Rows 4, 5, and 6 as used.	Please note that the "Best Available" values for the "Bent-Average Effectiveness" values from Table PG&E 6.1.3.1 in the attached Excel sheet. Line System Hardening Mitigation Average Effectiveness News 07/15/2024 1 Undergrounding All (9) 99% "Effectiveness Analysis" tab for reporting data 2 Undergrounding Primary Distribution Lines (3) 98% "Effectiveness Analysis" tab for reporting data 3 Line Removal with Renewal Grid 98% "Effectiveness Analysis" tab for reporting data Covered Conductor + EPSS + PPSB at 97% Calculated values using formula outlined in Tables 6.1.3.1 and 6.1.3.2 for the calculation and the	A Miele Full-Fy	4/7/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/2025/04/09/turn_002_009.pdf https://www.pge.com/assets/2025/04/09/turn_002_010.pdf	1	No		6	Wildfire Mitigation Strategy Development	6.1.3.1
6	TURN	002	TURN_002	6	No	TURN_002_06	Section 6.1.3.2, page 134, states, "Overhead system hardening combined with operations mitigations (EPSS and PPSB) has a high-risk reduction benefit that is roughly comparable to that of undergrounding without these operational mitigations. PG&E continues to prefer undergrounding to high-risk circuits where feasible for several reasons. Undergrounding is preferred risk reduction that does not have the negative reliability impacts from PPSB and EPSS. Underground facilities are less likely to be damaged during severe storms by high winds and vegetation falling into lines damaging the facilities or other contact with the lines from that point. Over time, undergrounding also has lower operations and maintenance expenses." a. Please provide any studies or reports in PG&E's possession that compare the long-term or life cycle costs of undergrounding with the costs of overhead hardening combined with EPSS and PPSB. b. Please provide any studies or reports in PG&E's possession that compare the long-term or life cycle costs of undergrounding with the costs of overhead hardening combined with EPSS and PPSB, and remote grids to reduce the reliability impacts of EPSS and PPSB. c. Please provide any studies or reports in PG&E's possession that compare the operations and maintenance expenses of undergrounding with overhead hardening. d. Please provide any studies or reports in PG&E's possession that compare the operations and maintenance expenses of undergrounding with overhead hardening combined with EPSS and PPSB. e. Please provide any studies or reports in PG&E's possession that compare the reliability (e.g., SAIDI, SAIFI, CAIDI, etc.) of undergrounded vs. overhead hardened facilities – not including the reliability impacts of PPSB and EPSS.	Please see PG&E's responses below. 1.2.3 PG&E has performed and will continue to perform a reasonably diligent search for any relevant studies or reports and will supplement this response if any are identified. a. As described in the 2025-2028 WMP (Review Notes PG&E-25-05), PG&E is developing a tool that will anticipate using in future regulatory filings. The tool, referred to as the Wildfire Benefit Cost Analysis (WBCCA) tool, will compare the long-term costs of undergrounding to the long-term costs for other mitigations including overhead hardening combined with EPSS and PPSB and the removal with remote grids. The tool will consider capital installation costs and several categories of O&M costs such as patrolling and inspection, emergency response, and vegetation management. The output from the tool will be a comparison of the long-term costs and benefits for different mitigation alternatives. b. As described in the 2025-2028 WMP (Review Notes PG&E-25-05), PG&E is developing a tool that will anticipate using in future regulatory filings. The tool, referred to as the WBCCA tool, will compare the long-term costs of undergrounding to the long-term costs for other mitigations including overhead hardening combined with EPSS and PPSB and the removal with remote grids. The tool will consider capital installation costs and several categories of O&M costs such as patrolling and inspection, emergency response, and vegetation management. The output from the tool will be a comparison of the long-term costs and benefits for different mitigation alternatives. c. PG&E is aware of various studies produced by academic institutions and third parties that compare the costs and benefits of undergrounding to other mitigations. See, for example, Dynamic Grid Management Technologies Reduce Wildfire Adaptation Costs in the Electric Power Sector. PG&E has not reviewed and does not necessarily support the information or conclusions in these third-party and academic studies. d. No, in the 2025 GRC PG&E prepared data response GRC-2025-PH_DR_TURN_134_041426071 that included an analysis of long-term operations and maintenance costs associated with the 2025 GRC undergrounding program. The system hardening mitigation assumptions and cost assumptions used in this analysis were based on information from the 2025 GRC and in many cases are no longer relevant. PG&E is identifying the study in order to be responsive to this data request but notes that the "Operational and maintenance costs and maintenance expenses" were not performed undergrounding work in 2022 and 2023 to quantify overall improvements in service reliability and address approximately a 90% reduction in faults that resulted in sustained outages after undergrounding work was completed. Please see Section 6.1.3.2 of our 2025-2028 WMP. Please note that the analysis did not compare undergrounding to overhead hardening. Please note that the analysis did not include the impacts of reliability impacts of undergrounding including covered conductor and undergrounding. PG&E is not currently aware of any studies or reports in PG&E's possession that compare the reliability of undergrounded and overhead hardened facilities. (Altogether, we expect undergrounding lines to be less susceptible to outage-causing conditions associated with exposed overhead lines such as damage and/or vegetation contact from severe winds, animal contact, line sag or wire down.) f. PG&E analyzed the reliability performance on sections of circuits where we performed undergrounding work in 2022 and 2023 to quantify overall improvements in service reliability and showed approximately a 90% reduction in faults that resulted in sustained outages after undergrounding work was completed. Please see Section 6.1.3.2 of our 2025-2028 WMP. Please note that the analysis did not compare undergrounding to overhead hardening. We are not aware of any studies or reports that we are in our possession that compare the reliability of undergrounded vs. overhead hardened facilities – not including the reliability impacts of PPSB and EPSS. However, we expect undergrounding lines to be less susceptible to outage-causing conditions associated with exposed overhead lines such as damage and/or vegetation contact from severe winds, animal contact, line sag or wire down.	A Miele Full-Fy	4/7/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/2025/04/09/turn_002_011.pdf https://www.pge.com/assets/2025/04/09/turn_002_012.pdf	0	No		6	Wildfire Mitigation Strategy Development	6.1.3.2

7	TURN	002	TURN_002	7	No	TURN_002_07	The microgrids discussed in 8.2.7 are said to not impact reliability because they are not dependent on outside lines. Do they increase reliability in areas where they have been installed and can they be deployed in conjunction with other hardening strategies to increase reliability concerns?	Section 8.2.7 addresses these microgrid related indices. Reactive Grids Reactive grids are not connected to the distribution system, as they place generation assets right at the customer location and the upstream distribution line to that location is removed. Therefore, any reliability concerns due to outages from the upstream distribution system are eliminated in the Reactive Grid system architecture. Temporary Distribution Microgrids These microgrids are not said to automatically reenergize upon an outage condition; they are manually operated to isolate and reenergize the microgrid footprint once the PSPS event has de-energized the area. In a pre-planned, pre-staged, pre-measured manner due to inherent design. While it is possible that they could be utilized during unplanned or planned outages, it would be highly dependent upon whether the temporary generation are pre-staged at the location, whether the location is safe to actually reenergize in that outage, and whether the actual process of reenergizing the microgrid (and subsequently restoring back to normal) is actually benefited from an outage duration (outage) versus simply controlling, restoring, and reenergizing the outage condition. Since these temporary distribution microgrids utilize reenergizing engine generating assets, the ability to automatically reenergize these facilities is not available. Continuously Energized Distribution Program and Microgrid Inertia Program WMP Discussion 2020-2028, CH, TURN_002-Q007 Page 2 These microgrids are continually energized and deliver needed reliability in areas where they are installed, but are dependent upon the condition and status of the outages and the grid design of the microgrid footprint that extends its capability to support operations. Each microgrid being requested to be designed by these communities through these funds are unique and therefore their impact will vary by design. As described Section 7, page 170: "PSPS: Lessons Learned" and explained in PG&E's post-de-energization report for the July 2, 2024 PSPS event, two severe and events were forecasted to come in separate back to back waves. The first and event meeting PSPS criteria occurred during overnight period of July 1-2 with a brief fall in the winds that occurred during the day of July 2. The second forecasted wave of critical the weather conditions meeting our PSPS criteria were forecasted to occur later in the evening which allowed us to plan and temporarily re-energize the portions of the customers who were impacted by the first wave to allow customers to cool their homes and change their clothes. On the evening of July 2, weather conditions deteriorated rapidly meeting our PSPS criteria and requiring us to de-energize a second time as a result of the second wave of severe weather conditions. Please see the following link for our July 2, 2024 post-de-energization report: https://www.pge.com/assets/pge/docs/turning-and-advancing-pge-microgrids-empowerpgae_pspss_Post-Event_Report_20240702-awarded.pdf Generally, conditions that allow PG&E to temporarily re-energize during PSPS events are the fall in critical weather conditions. The fall period would need to have a fall in our forecast to plan following the weather advisory. Weather "All-Clears" are called based on our weather, geographic areas and requiring of each weather station in each town to that area. WMP Inertia Program, CH, TURN_002-Q008 Page 2 Please note that the specific conditions that areas during the July 2, 2024 event allowed PG&E to re-energize a portion of affected customers. Temporary re-energization is condition and event specific and not a pre-programmed condition.	A Mobile Full-Fly	4/7/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/pge/docs/turning-and-advancing-pge-microgrids-empowerpgae_pspss_Post-Event_Report_20240702-awarded.pdf	0	No	8	Grid Design, Operations, and Maintenance	8.2.7
8	TURN	002	TURN_002	8	No	TURN_002_08	Section 7, page 170, states that "during the July 2, 2024 PSPS event, we were able to reduce the event duration for some customers by temporarily re-energizing a line that serves a portion of the impacted customers?" and "John may offer temporary re-energization during future PSPS events where conditions allow." What conditions are necessary to re-energize partial or temporary re-energization during PSPS events?	Section 7, page 170, states that "during the July 2, 2024 PSPS event, we were able to reduce the event duration for some customers by temporarily re-energizing a line that serves a portion of the impacted customers?" and "John may offer temporary re-energization during future PSPS events where conditions allow." What conditions are necessary to re-energize partial or temporary re-energization during PSPS events?	A Mobile Full-Fly	4/7/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/pge/docs/turning-and-advancing-pge-microgrids-empowerpgae_pspss_Post-Event_Report_20240702-awarded.pdf	0	No	7	Public Safety Power Shutoff	7
9	TURN	002	TURN_002	9	No	TURN_002_09	Table 10 in the values in the following table (all units are miles)	Please see attachment "WMP Discussion 2020-2028, CH, TURN_002-Q004-0041 about". The following conditions and events are listed in the table: 1. A subject system multiple High Fire-Threat District (HFTD) lines, the subject is attributed to the higher tier (e.g., A subject falls under both Tier 2 and Tier 3, its release is attributed to Tier 3). For data on overhead miles replaced by undergrounding: For subjects that are 100% undergrounding with available overhead removal data, the reported figures reflect the overhead miles removed. 2. For hybrid subjects (partially underground and a combination of overhead hardening and/or line removal) or cases where overhead removal data is unavailable, miles are calculated using a conversion factor: 1 mile of overhead equals 1.25 miles of undergrounding. WMP Discussion 2020-2028, CH, TURN_002-Q009 Page 2 Since the sample data not impact miles contained within HFTDs, this response excludes system hardening work under the Community Hardening Program. 3. The original table requested both 2022 isolate and planned miles replaced but the table includes 2022 isolate and planned miles replaced.	A Mobile Full-Fly	4/7/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/pge/docs/turning-and-advancing-pge-microgrids-empowerpgae_pspss_Post-Event_Report_20240702-awarded.pdf	1	No	8	Grid Design, Operations, and Maintenance	8.2.2
10	TURN	002	TURN_002	10	No	TURN_002_010	Please provide a narrative explanation of the decision tree shown in Figure 8.2.1-2, including any criteria that PG&E intends to use to determine if a Figure 8.2.1-2 appears to indicate that UG is preferred when CBR is 1-1 and within 10% of the CH or EPSS CBR or UG is 10% or less. Please explain the basis for the Figure 8.2.1-2. a. To explain that the decision tree begins with UG as the initial option and only moves to alternatives when certain criteria are not met. Why does PG&E begin with the more cost-effective hybrid approach and move to UG when absolutely necessary? b. Please explain the tree criteria scores and how they are determined? Why is a score of 0 significant? c. Please identify and explain each and every criterion that is considered in determining "Are There Expenses/risks concerns represented by PDS event?" Please provide a narrative explanation of the types of concerns and how they impact risk. d. Please provide a narrative explanation of the PDS's polygon and the effect on CPZ. e. As any point in the decision tree, are the hybrid project CBRs recalculated based on different permutations/combinations?	Please provide a narrative explanation of the decision tree shown in Figure 8.2.1-2, including any criteria that PG&E intends to use to determine if a Figure 8.2.1-2 appears to indicate that UG is preferred when CBR is 1-1 and within 10% of the CH or EPSS CBR or UG is 10% or less. Please explain the basis for the Figure 8.2.1-2. a. To explain that the decision tree begins with UG as the initial option and only moves to alternatives when certain criteria are not met. Why does PG&E begin with the more cost-effective hybrid approach and move to UG when absolutely necessary? b. Please explain the tree criteria scores and how they are determined? Why is a score of 0 significant? c. Please identify and explain each and every criterion that is considered in determining "Are There Expenses/risks concerns represented by PDS event?" Please provide a narrative explanation of the types of concerns and how they impact risk. d. Please provide a narrative explanation of the PDS's polygon and the effect on CPZ. e. As any point in the decision tree, are the hybrid project CBRs recalculated based on different permutations/combinations?	A Mobile Full-Fly	4/7/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/pge/docs/turning-and-advancing-pge-microgrids-empowerpgae_pspss_Post-Event_Report_20240702-awarded.pdf	0	No	8	Grid Design, Operations, and Maintenance	8.2.1-2
11	OEIS	001	OEIS_001	1	No	OEIS_001_01	Regarding Vegetation Management GA and QC Units On page 410 of the 2020-2028 WMP, PG&E has "inspections" as the "Population Size/Sample Size" for VM&S, VM&S, VM&S, and VM&S. However, in the "Sample Size" column, PG&E uses a different unit, listing the number of miles (VM&S, VM&S, and VM&S) and not the number of miles (VM&S, VM&S, and VM&S), that is, it will audit. a. Define and describe the "inspections" and. b. Clearly whether PG&E is auditing all work performed and not performed along the length of the sample population, or discrete documented "inspections" within those parameters. c. If PG&E audits discrete inspections other than the length of a sample, response Table 9-6 "Vegetation Management GA and QC Activity" with. d. An estimated total number of inspections it could potentially audit under the 2020, 2027, and 2038 "Population Size" columns. e. An estimated number of inspections PG&E plans to audit under the 2020, 2027, and 2038 "Sample Size" columns. f. For VM&S units, PG&E has "miles" in "Population Size" column, "miles" in "Sample Size", and "inspections" in the "Population Size/Sample Size" column. How does PG&E use the "miles" in the "Population Size/Sample Size" column?	Regarding Vegetation Management GA and QC Units On page 410 of the 2020-2028 WMP, PG&E has "inspections" as the "Population Size/Sample Size" for VM&S, VM&S, VM&S, and VM&S. However, in the "Sample Size" column, PG&E uses a different unit, listing the number of miles (VM&S, VM&S, and VM&S) and not the number of miles (VM&S, VM&S, and VM&S), that is, it will audit. a. Define and describe the "inspections" and. b. Clearly whether PG&E is auditing all work performed and not performed along the length of the sample population, or discrete documented "inspections" within those parameters. c. If PG&E audits discrete inspections other than the length of a sample, response Table 9-6 "Vegetation Management GA and QC Activity" with. d. An estimated total number of inspections it could potentially audit under the 2020, 2027, and 2038 "Population Size" columns. e. An estimated number of inspections PG&E plans to audit under the 2020, 2027, and 2038 "Sample Size" columns. f. For VM&S units, PG&E has "miles" in "Population Size" column, "miles" in "Sample Size", and "inspections" in the "Population Size/Sample Size" column. How does PG&E use the "miles" in the "Population Size/Sample Size" column?	Nathan Poon	4/8/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/pge/docs/turning-and-advancing-pge-microgrids-empowerpgae_pspss_Post-Event_Report_20240702-awarded.pdf	0	No	9	Vegetation Management & Inspections	9.11
12	OEIS	001	OEIS_001	2	No	OEIS_001_02	Regarding Vegetation Management GA and QC Units On page 410 of the 2020-2028 WMP, PG&E specifies that 100% of GAGC samples are from locations within the HFTD. a. Does PG&E perform GAGC in its HFTD? b. If yes, describe the GAGC program in its HFTD. c. If not, why does it not extend the GAGC program to its HFTD? d. Does PG&E perform GAGC in non-HFTD areas? e. If yes, describe the GAGC program in non-HFTD areas. f. Does PG&E perform GAGC in non-HFTD areas? g. Does PG&E perform GAGC in non-HFTD areas?	Regarding Vegetation Management GA and QC Units On page 410 of the 2020-2028 WMP, PG&E specifies that 100% of GAGC samples are from locations within the HFTD. a. Does PG&E perform GAGC in its HFTD? b. If yes, describe the GAGC program in its HFTD. c. If not, why does it not extend the GAGC program to its HFTD? d. Does PG&E perform GAGC in non-HFTD areas? e. If yes, describe the GAGC program in non-HFTD areas. f. Does PG&E perform GAGC in non-HFTD areas? g. Does PG&E perform GAGC in non-HFTD areas?	Nathan Poon	4/8/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/pge/docs/turning-and-advancing-pge-microgrids-empowerpgae_pspss_Post-Event_Report_20240702-awarded.pdf	0	No	9	Vegetation Management & Inspections	9.11
12	OEIS	001	OEIS_001	206	Yes	OEIS_001_206a	Regarding Vegetation Management GA and QC Outside the HFTD On page 410 of the 2020-2028 WMP, PG&E specifies that 100% of GAGC samples are from locations within the HFTD. a. Does PG&E perform GAGC in its HFTD? b. Does PG&E perform GAGC in its HFTD? c. Does PG&E perform GAGC in its HFTD? d. Does PG&E perform GAGC in its HFTD? e. Does PG&E perform GAGC in its HFTD? f. Does PG&E perform GAGC in its HFTD? g. Does PG&E perform GAGC in its HFTD?	Regarding Vegetation Management GA and QC Outside the HFTD On page 410 of the 2020-2028 WMP, PG&E specifies that 100% of GAGC samples are from locations within the HFTD. a. Does PG&E perform GAGC in its HFTD? b. Does PG&E perform GAGC in its HFTD? c. Does PG&E perform GAGC in its HFTD? d. Does PG&E perform GAGC in its HFTD? e. Does PG&E perform GAGC in its HFTD? f. Does PG&E perform GAGC in its HFTD? g. Does PG&E perform GAGC in its HFTD?	Nathan Poon	4/8/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/pge/docs/turning-and-advancing-pge-microgrids-empowerpgae_pspss_Post-Event_Report_20240702-awarded.pdf	0	No	9	Vegetation Management & Inspections	9.11
12	SPO	002	SPO_002	4	No	SPO_002_04	Regarding Vegetation Management GA and QC Outside the HFTD On page 410 of the 2020-2028 WMP, PG&E specifies that 100% of GAGC samples are from locations within the HFTD. a. Does PG&E perform GAGC in its HFTD? b. Does PG&E perform GAGC in its HFTD? c. Does PG&E perform GAGC in its HFTD? d. Does PG&E perform GAGC in its HFTD? e. Does PG&E perform GAGC in its HFTD? f. Does PG&E perform GAGC in its HFTD? g. Does PG&E perform GAGC in its HFTD?	Regarding Vegetation Management GA and QC Outside the HFTD On page 410 of the 2020-2028 WMP, PG&E specifies that 100% of GAGC samples are from locations within the HFTD. a. Does PG&E perform GAGC in its HFTD? b. Does PG&E perform GAGC in its HFTD? c. Does PG&E perform GAGC in its HFTD? d. Does PG&E perform GAGC in its HFTD? e. Does PG&E perform GAGC in its HFTD? f. Does PG&E perform GAGC in its HFTD? g. Does PG&E perform GAGC in its HFTD?	Eddie Schmitt	4/16/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/pge/docs/turning-and-advancing-pge-microgrids-empowerpgae_pspss_Post-Event_Report_20240702-awarded.pdf	0	No	NA	NA	NA
13	OEIS	001	OEIS_001	3	No	OEIS_001_03	Regarding Vegetation Management GA and QC Targeted Risk Rates On page 410 of the 2020-2028 WMP, PG&E has a target risk rate for Vegetation Management Quality Assurance (VMQA) of 0.75%. On page 411, PG&E states that VMQA has a "70% estimated level of compliance." a. How does PG&E use the "estimated level of compliance" in its operations? b. Explain why the estimated level of compliance differs from the target pass rate.	Regarding Vegetation Management GA and QC Targeted Risk Rates On page 410 of the 2020-2028 WMP, PG&E has a target risk rate for Vegetation Management Quality Assurance (VMQA) of 0.75%. On page 411, PG&E states that VMQA has a "70% estimated level of compliance." a. How does PG&E use the "estimated level of compliance" in its operations? b. Explain why the estimated level of compliance differs from the target pass rate.	Nathan Poon	4/8/2025	4/10/2025	4/10/2025	https://www.pge.com/assets/pge/docs/turning-and-advancing-pge-microgrids-empowerpgae_pspss_Post-Event_Report_20240702-awarded.pdf	0	No	9	Vegetation Management & Inspections	9.11

14	OEIS	001	OEIS_001	4	No	OEIS_001_04	Regarding Vegetation Management Field Quality Control On pages 41-51 of the 2020-2023 WMP, PG&E states that it discontinued its Field Quality Control (FQC) because it is redundant to "ongoing knowledge checks." a. Describe the similarities and differences between FQC and "ongoing knowledge checks." b. List the redundancies between FQC and "ongoing knowledge checks." c. For non-redundant aspects: i. Explain whether and how PG&E accounts for these aspects in other ways (e.g., other QA/QC programs). ii. If PG&E does not account for these aspects in other ways, explain why PG&E discontinued	A. Vegetation Management (VM) Knowledge Checks i. VM operations use this check as a required monthly ii. VM construction management development of a Vegetation Management Inspection (VMI) assessment tool with both field and desk review components iii. Periodic field visits of VM from the PG&E leadership team or delegates Field Quality Control (FQC) Assessments 1. Performs on-site knowledge assessments of VM using a defined checklist applicable to specific VM work scopes 2. FQC scope required annual assessment of at least 50% of the eligible population WMP Document 2020-2023_DR_OEIS_001-Q004 Page 2 3. FQC scope included direct observation of VM inspection work behaviors and adherence to standards in applicable guidance documentation 4. FQC performs on-site knowledge assessments of VM using a standardized checklist. The VMI assessment team will perform knowledge assessments of VM using standardized testing methods 5. FQC performs on-site field observations of VM. The existing Vegetation Operator Inspection (VOI) team and internal operations field leadership perform periodic field visits with VMI c. For non-redundant aspects: i. FQC reviews VM adherence to applicable regulatory requirements and internal guidance documentation and publishes the results in a reporting system. QA/QC can be used as an analogy for VM performance by auditing the VM work product. ii. N/A iii. PG&E aggregates quality control of two activities, inspections, and tree work, into one target because the VMOC assessment criteria allows both VM inspection and tree work activities to be evaluated to ensure procedural and regulatory compliance is met for the annual review cycle.	Nathan Poon	4/8/2025	4/1/2025	4/1/2025	https://www.pge.com/assets/pge/docs/vegetation-and-ecosystem/vegetation-management-and-ecosystem/2020-2023-vmoc-001.pdf	0	No	9	Vegetation Management & Inspections	9.11
15	OEIS	001	OEIS_001	5	No	OEIS_001_05	Regarding Vegetation Management Field Review On pages 41-51 of the 2020-2023 WMP, PG&E states that it discontinued its Field Quality Control (FQC) because it is redundant to "ongoing knowledge checks." a. Describe the similarities and differences between FQC and "ongoing knowledge checks." b. List the redundancies between FQC and "ongoing knowledge checks." c. For non-redundant aspects: i. Explain whether and how PG&E accounts for these aspects in other ways (e.g., other QA/QC programs). ii. If PG&E does not account for these aspects in other ways, explain why PG&E discontinued	A. No. PG&E's VMOC program's record keeping system does not distinguish between field reviews of inspection and field review of tree work. ii. N/A iii. PG&E aggregates quality control of two activities, inspections, and tree work, into one target because the VMOC assessment criteria allows both VM inspection and tree work activities to be evaluated to ensure procedural and regulatory compliance is met for the annual review cycle.	Nathan Poon	4/8/2025	4/1/2025	4/1/2025	https://www.pge.com/assets/pge/docs/vegetation-management-and-ecosystem/2020-2023-vmoc-001.pdf	0	No	9	Vegetation Management & Inspections	9.11
16	OEIS	001	OEIS_001	6	No	OEIS_001_06	Regarding Vegetation Management Work Orders On page 117 of the 2020-2023 WMP, PG&E lists past due work orders in Table 7 and 8 and notes that "work orders are excluded from this table." a. Provide a table 7 and 8 of existing completed work orders. b. List the number of past due work orders categorized by the following categories: i. Emergency and Critical ii. Customer iii. Environmental Permit iv. Environmental Permit v. Environmental Permit vi. For Environmental and Environmental Permit constraints, list the number of past due work orders by the permit level (e.g., critical, emergency, etc.). c. For Environmental and Environmental Permit constraints, list the number of past due work orders by the permit level (e.g., critical, emergency, etc.).	A. Please note, PG&E does not consider completed work orders. Please see attached below for a breakdown of completed work orders by constrained category and PTD. The table is as follows: i. Emergency and Critical ii. Customer iii. Environmental Permit iv. Environmental Permit v. Environmental Permit vi. For Environmental and Environmental Permit constraints, list the number of past due work orders by the permit level (e.g., critical, emergency, etc.). c. For Environmental and Environmental Permit constraints, list the number of past due work orders by the permit level (e.g., critical, emergency, etc.).	Nathan Poon	4/8/2025	4/1/2025	4/1/2025	https://www.pge.com/assets/pge/docs/vegetation-management-and-ecosystem/2020-2023-vmoc-001.pdf	0	No	9	Vegetation Management & Inspections	9.12
17	OEIS	001	OEIS_001	7	No	OEIS_001_07	Regarding Vegetation Management Training and Retention On pages 42-53 of the 2020-2023 WMP, PG&E describes "formal courses (structured and web-based) and on-the-job training" in describing vegetation management personnel training. a. Describe how PG&E invests in the career advancement of its vegetation management personnel. b. Describe PG&E's efforts to retain vegetation management personnel.	A. PG&E invests in the career advancement of its vegetation management (VM) personnel by covering the cost of and providing training opportunities including basic Adorant Certification and advanced qualifications like Tree Risk Assessment Qualified (TRAQ). PG&E also helps to incentivize the certification process and staff personnel in their Adorant certification lead preparation by hosting weekly International Society of Arboriculture (ISA) Adorant Certification study group calls. For current Adorants, PG&E collaborates with the Western Chapter ISA to schedule dedicated TRAQ qualification training days, ensuring easy access to the course. b. PG&E has increased the Vegetation Management Inspector (VMI) and Vegetation Operator Inspection (VOI) positions to enhance retention of VM personnel. This inflation has resulted in increased wages and established clear career paths for individuals.	Nathan Poon	4/8/2025	4/1/2025	4/1/2025	https://www.pge.com/assets/pge/docs/vegetation-and-ecosystem/vegetation-management-and-ecosystem/2020-2023-vmoc-001.pdf	0	No	9	Vegetation Management & Inspections	9.13
18	OEIS	001	OEIS_001	8	No	OEIS_001_08	Regarding PG&E-208-18: Improving Vegetation Management Inspector Qualifications On pages 42-53 of the 2020-2023 WMP, PG&E describes how it will improve the qualifications and training of VM inspection. PG&E states that it has "implemented a process of profiling training courses within the VM organization based on personnel role and identified formal employee or contractor roles." a. Describe the "profiling" process. b. Define "profiling" in the context of "profiling training courses."	With the profiling process, Vegetation Management personnel are automatically assigned trainings based on their job title. This process automatically adjusts training requirements when individuals are hired or change job titles. i. Profiling in the context of "Profiling Training Courses" is defined as linking	Nathan Poon	4/8/2025	4/1/2025	4/1/2025	https://www.pge.com/assets/pge/docs/vegetation-management-and-ecosystem/2020-2023-vmoc-001.pdf	0	No	9	Vegetation Management & Inspections	9.13
19	OEIS	001	OEIS_001	9	No	OEIS_001_09	Regarding Distribution Routine Patrol Program On page 363, PG&E's WMP states "PG&E is in the process of evaluating which components of the Proposed Tree Inspection (PTI) and Tree Removal Inventory (TRI) scope will be incorporated into the Distribution Routine Patrol Program. The analysis will be based on findings from the analysis planned to be performed in 2025. PG&E will incorporate VMOC into activities described in Activities Based on Weather Conditions." a. Does PG&E have specific, measurable, achievable, relevant, and time-bound (SMART) targets for evaluating which components of the PTI and TRI scope will be incorporated into the Distribution Routine Patrol Program, the efficacy study, and incorporating VMOC into activities based on weather conditions? b. If not, explain why PG&E does not have SMART targets for the plan to incorporate the vegetation inspection programs for distribution circuits in the PTI. c. Provide the procedures for these efficacy studies. d. When does PG&E expect to determine which components of the PTI and TRI scope will be incorporated into the Distribution Routine Patrol Program? e. When does PG&E expect to determine which components of the PTI and TRI scope will be incorporated into the Distribution Routine Patrol Program?	On page 363, PG&E's WMP states "PG&E is in the process of evaluating which components of the Proposed Tree Inspection (PTI) and Tree Removal Inventory (TRI) scope will be incorporated into the Distribution Routine Patrol Program. The analysis will be based on findings from the analysis planned to be performed in 2025. PG&E will incorporate VMOC into activities described in Activities Based on Weather Conditions." a. Does PG&E have specific, measurable, achievable, relevant, and time-bound (SMART) targets for evaluating which components of the PTI and TRI scope will be incorporated into the Distribution Routine Patrol Program, the efficacy study, and incorporating VMOC into activities based on weather conditions? b. If not, explain why PG&E does not have SMART targets for the plan to incorporate the vegetation inspection programs for distribution circuits in the PTI. c. Provide the procedures for these efficacy studies. d. When does PG&E expect to determine which components of the PTI and TRI scope will be incorporated into the Distribution Routine Patrol Program? e. When does PG&E expect to determine which components of the PTI and TRI scope will be incorporated into the Distribution Routine Patrol Program?	Nathan Poon	4/8/2025	4/1/2025	4/1/2025	https://www.pge.com/assets/pge/docs/vegetation-management-and-ecosystem/2020-2023-vmoc-001.pdf	0	No	9	Vegetation Management & Inspections	9.2.1
20	OEIS	001	OEIS_001	10	No	OEIS_001_010	Regarding Pruning and Removal On page 371, PG&E's WMP states "PG&E is examining work prioritization categories beyond the P1, P2, and Routine designation." For the examination: a. Provide a description of the parts of the service territory these new designations will apply to including the reason these parts of the service territory would benefit from additional prioritization categories. b. Provide a schedule for and anticipated completion date of the examination. c. Provide an anticipated effective date of the new prioritization category scheme (i.e., when the prioritization scheme will be used by personnel in the field).	A. There is no formalized procedure specific to the plan. PG&E followed T07-1102P 01, Distribution Inspection Procedure and TRAQ-qualified arborist and the subsequent Board-Certified Master Arborist reviews. i. The field reviews of the Pilot began in Quarter 4 of 2024 for Level 2 Inspections performed by a TRAQ-qualified arborist and the subsequent Board-Certified Master Arborist reviews. ii. All Level 2 field inspections by TRAQ-qualified arborists were completed in Q1 2025. iii. Any remaining Board-Certified Master Arborist reviews are expected to be completed in Q2 2025. Please note: Subsequent to the field collection of data, PG&E plans to analyze the results of the pilot and evaluate recommended next steps by Q4 2025. WMP Document 2020-2023_DR_OEIS_001-Q012 Page 2 c. The study is a pending completion and subsequent documentation. Documentation will be completed by Q4 2025 for recommendations. The recommendations resulting from the findings of the pilot are also dependent on continued feedback from internal and external stakeholders.	Nathan Poon	4/8/2025	4/1/2025	4/1/2025	https://www.pge.com/assets/pge/docs/vegetation-management-and-ecosystem/2020-2023-vmoc-001.pdf	0	No	9	Vegetation Management & Inspections	9.3
21	OEIS	001	OEIS_001	11	No	OEIS_001_011	Regarding Enterprise System Qualitative Targets On pages 535-536 of the WMP, PG&E provides qualitative target ES-01: a. Provide the current date, quality, profiling, and monitoring practices used for VM data. b. Provide the date, quality, profiling, and monitoring practices planned for use under ES-01. c. List the datasets that have been identified as critical for VM execution.	A. Our current data quality, profiling, and monitoring practices occur in three phases: - MANAGE i. Define - develop dataset inventory ii. Monitor - provide the information needed to use the data iii. Critical data elements - list the critical data elements to be managed iv. Standardize - define required data standards needed v. Profile - analyze the critical data elements vi. Purge - define business rules to ensure the data meets quality requirements vii. Retain - determine retention timeline length for the dataset - MITIGATE i. Test - build tests to measure quality data ii. Measure - identify data that fails quality standards iii. Control - identify control points in the process that need to be managed iv. Cleanse - conduct actions to remove or improve poor quality data v. Monitor - ensure remediation actions complete and data maintains quality over time vi. Dispose - determine when and how to dispose of dataset records - MAINTAIN i. Stability - ensure data maintains its quality over time ii. Maintain - update the process, the controls, and the data iii. We will continue to apply the prior mentioned practices of MANAGE, MITIGATE, MAINTAIN against remaining unmanaged critical data sets. iv. There are currently 25 critical datasets for VM execution. The number and specific datasets are subject to change as execution needs change. Please see list below: - Account - Asset - Assign/Resource - Case - Case Comment	Nathan Poon	4/8/2025	4/1/2025	4/1/2025	https://www.pge.com/assets/pge/docs/vegetation-management-and-ecosystem/2020-2023-vmoc-001.pdf	0	No	12	Enterprise Systems	12.2
22	OEIS	001	OEIS_001	12	No	OEIS_001_012	Regarding PG&E-2016-08: Retention of Trees in Tree Removal Inventory On page 383 of the WMP, PG&E provides a plan to PG&E-2016-08 including "in late 2024, PG&E began planning a pilot to re-evaluate trees listed for work within Shasta County." a. Provide pilot study parameters. b. Provide pilot study schedule. c. Provide any study results.	A. There is no formalized procedure specific to the pilot. PG&E followed T07-1102P 01, Distribution Inspection Procedure and TRAQ-qualified arborist and the subsequent Board-Certified Master Arborist reviews. i. The field reviews of the Pilot began in Quarter 4 of 2024 for Level 2 Inspections performed by a TRAQ-qualified arborist and the subsequent Board-Certified Master Arborist reviews. ii. All Level 2 field inspections by TRAQ-qualified arborists were completed in Q1 2025. iii. Any remaining Board-Certified Master Arborist reviews are expected to be completed in Q2 2025. Please note: Subsequent to the field collection of data, PG&E plans to analyze the results of the pilot and evaluate recommended next steps by Q4 2025. WMP Document 2020-2023_DR_OEIS_001-Q012 Page 2 c. The study is a pending completion and subsequent documentation. Documentation will be completed by Q4 2025 for recommendations. The recommendations resulting from the findings of the pilot are also dependent on continued feedback from internal and external stakeholders.	Nathan Poon	4/8/2025	4/1/2025	4/1/2025	https://www.pge.com/assets/pge/docs/vegetation-management-and-ecosystem/2020-2023-vmoc-001.pdf	0	No	9	Vegetation Management & Inspections	9.2.1

23	OESB	001	OESB_001	13	No	OESB_001_013	Regarding Wood and Slash Management Tracking On page 9-3 of the 2020-2028 WMP, PG&E states "The debris management is completed in coordination with the waste across PG&E's service area. Wood management that is conducted in response to a wildfire incident is typically completed either days or weeks after project completion across PG&E's service areas, unless affected weather, field conditions, or other constraints" (p. 9-3) a. Does PG&E document and track the management of slash and woody debris that is a byproduct of VM work? If yes: A. Describe the documentation and record keeping methods used. b. List the data fields that are recorded at the point of the wood and slash management tracking process. c. If yes, explain: d. How PG&E assesses wood and slash management is completed in all VM treatment areas according to the Utility Standard, TD-7116S and Utility Procedure, TD-7116P-01? e. How PG&E plans to integrate wood and slash debris management tracking into internal procedures similar to tracking the completion of other VM activities.	a. No. PG&E does not track the management of slash and woody debris, vegetation. NA WMP Discovery 2020-2028_DR_OESB_001-Q013 Page 2 b. See below: c. There is no language in the Utility Standard, TD-7116S or the Utility Procedure, TD-7116P-01 requiring vegetation management (VM) crews to track the management of slash and woody debris. PG&E checks its VM crews to complete data fields tracked in coordination with the new work. This expectation is clearly defined in our contract specification: "Specific Conditions No. S454 for Vegetation Management (VM) Tree Trimming and Brush Removal." When new work is signed as complete in the database it VM crew, it implies that the crew has also completed the associated debris treatment. For reference, here is a screenshot of the contract language from Exhibit J, Page 4 of the Specific Conditions No. S454 for Vegetation Management (VM) Tree Trimming and Brush Removal: b. PG&E has no prior to sign-off wood and slash debris management responsibilities.	Nathan Poon	4/8/2025	4/11/2025	4/11/2025	https://www.pge.com/assets/pge/docs/outage-and-safety/vm-outage-and-safety-procedures-and-support/V2024-0128-OESB_001.pdf	0	No	9	Vegetation Management & Inspections	9.5
24	OESB	001	OESB_001	14	No	OESB_001_014	Regarding Wood and Slash Management Impacts on Wildlife Risk PG&E CTR 238, titled "Wildlife Management Procedures," requires updated "Wood Management Procedures" that "[provides] the wildlife risk related to accumulated fuels generated by PG&E's vegetation management activities." On page 556 of the WMP, PG&E states that, relative to utility fires, TD-7116S and Utility Procedure, TD-7116P-01 include "updates to industry practices related to accumulated fuels generated by VM activities." a. Clearly what industry practices PG&E is following? b. Explain how wildlife risk related to accumulated fuels generated by PG&E's vegetation management activities is considered in Utility Standard, TD-7116S and Utility Procedure, TD-7116P-01?	a. The utility vegetation management industry is increasingly concerned about impacts to sensitive species due to increased fire risk. As a result, many utilities are aligning with industry practices which includes expanding wood management efforts to all customers and land managers upon request, often a defined scope and areas of vegetation management programs. This alignment with industry best practice is documented in our response to question 15 specifically referencing our and future scheduled benchmarking activities with SOG&E, SCE and County Utilities. b. In addition to expanding wood management efforts as described above, our Wood Management Practices aligns with relevant science requirements and expectations outlined in the State of California Public Resource Code (PRC) Section 4231 and California Code of Regulations (CCR) Title 14 Section 1209.03. Our scope includes wood management within the following zones: • 100 feet of a human-inhabitable structure, structure footprint, or canopy. • WMP Discovery 2020-2028_DR_OESB_001-Q014 Page 2 • Vegetation located within 10 feet of the access road to a human inhabitable structure, structure footprint, or canopy. • Vegetation located is located within 15 feet of a building or property boundary.	Nathan Poon	4/8/2025	4/11/2025	4/11/2025	https://www.pge.com/assets/pge/docs/outage-and-safety/vm-outage-and-safety-procedures-and-support/V2024-0128-OESB_001.pdf	0	No	9	Vegetation Management & Inspections	9.5
25	OESB	001	OESB_001	15	No	OESB_001_015	Regarding Wood and Slash Management Benchmarking On page 556 of the 2020-2028 WMP, PG&E states "In addition to the benchmarking meeting with SCE and SOG&E to discuss wood management begun in 2023, SOG&E and benchmarking is targeted to begin by September 18, 2025 (p. 556)." These documents state that PG&E will follow a "best practice approach" known as "Native Step" the new Wood Management Standard and Procedure, though, "Native Step" provides a general approach across utilities (PG&E) aligned and updated our Standard Procedure to reflect the common ground of PRC 4231(b), 588). Future benchmarking meetings topics are expected to include consideration of whether each utility's respective wood management policy meet the required progress outlined in the plan for continued improvement (p. 587). a. Explain why PG&E plans for the benchmarking effort spans over five years. b. Describe common and uncommon practices between PG&E, SCE, and Utility that have been identified during the benchmarking effort, explain how each assessment practice was determined to be included or excluded from PG&E's updated Utility Standard, TD-7116S and Utility Procedure, TD-7116P-01. c. Describe specific outcomes from the benchmarking effort along with how those outcomes relate to specific updates in the Utility Standard, TD-7116S and Utility Procedure, TD-7116P-01. d. Compare PG&E's past wood management practices along with the changes in the updated wood management procedure and describe how the updates to the procedure meet the required progress of PG&E 238-16.	a. The utility vegetation management industry is increasingly concerned about impacts to sensitive species due to increased fire risk. As a result, many utilities are aligning with industry practices which includes expanding wood management efforts to all customers and land managers upon request, often a defined scope and areas of vegetation management programs. This alignment with industry best practice is documented in our response to question 15 specifically referencing our and future scheduled benchmarking activities with SOG&E, SCE and County Utilities. b. In addition to expanding wood management efforts as described above, our Wood Management Practices aligns with relevant science requirements and expectations outlined in the State of California Public Resource Code (PRC) Section 4231 and California Code of Regulations (CCR) Title 14 Section 1209.03. Our scope includes wood management within the following zones: • 100 feet of a human-inhabitable structure, structure footprint, or canopy. • WMP Discovery 2020-2028_DR_OESB_001-Q014 Page 2 • Vegetation located within 10 feet of the access road to a human inhabitable structure, structure footprint, or canopy. • Vegetation located is located within 15 feet of a building or property boundary.	Nathan Poon	4/8/2025	4/11/2025	4/11/2025	https://www.pge.com/assets/pge/docs/outage-and-safety/vm-outage-and-safety-procedures-and-support/V2024-0128-OESB_001.pdf	0	No	9	Vegetation Management & Inspections	9.5
26	OESB	001	OESB_001	16	No	OESB_001_016	Regarding Vegetation Inspection Methodology and Treatment Timing In Section 9.7.2 VM Scheduling, PG&E states that "For TMM previously received ROWs are reassessed every 2-3 years" (p. 369). The 2020-2028 WMP does not provide the need for re-assessment of Transmission ROWs is determined. In contrast, PG&E x 2023-2025 WMP provided threshold triggers for reassessment of vegetation, including "Reassess vegetation approximately 3 to 5 height/or shorter intervals depending on greater than ten percent ground coverage within the ROW" (p. 695). a. Describe the vehicle conducting transmission inspection on a 2-4 year cycle and clearly what factors (e.g. species, growth rates, percent cover, height) were used to define this timeframe. b. Clearly the threshold triggers PG&E will use to determine the need for reassessment of vegetation in transmission ROWs during the 2020-2028 WMP cycle.	a. The vehicle used for the reassessment is a 2-4 year cycle of reassessment of the ROWs to be reviewed based on the information that accumulates vegetation upon review within that timeframe. The availability of certain vehicles and equipment needed to conduct the reassessment is analyzed each year. This data also allows us to plan year-over-year growth analysis by year. The vegetation conditions are that used for work after development using the results described below. b. The quantity of TMM each week by year and is dependent on the resources available. PG&E continues the following steps to determine the need for reassessment of vegetation in transmission ROWs during work plan development: • The year in which previous ROW reassessment/HOT clearing request work was completed. • Follow-up VM maintenance is then typically required to occur within 1-6 years. • How many previous years of VM maintenance have occurred on a line and other factors. • How many previous years of VM maintenance have occurred on a line and other factors. • Vegetation height and density (% cover of size classes 4-6-12 feet, 4-6 feet, and 4-6 feet). • HFTD/HFRA Turn and circuit mileage length. • Assets and hardware considerations.	Nathan Poon	4/8/2025	4/11/2025	4/11/2025	https://www.pge.com/assets/pge/docs/outage-and-safety/vm-outage-and-safety-procedures-and-support/V2024-0128-OESB_001.pdf	0	No	9	Vegetation Management & Inspections	9.7.2
27	OESB	001	OESB_001	17	No	OESB_001_017	Regarding Covered Conductor, Line Removal and Monitors On page 102 of the 2020-2028 WMP, PG&E states "System Hardening (CH-12) includes routine overhead inspections, specifically covered conductor installation and line removal, including remote removal." a. Provide separate targets for the following initiatives in the same table format as Table 5-1. b. Covered Conductor c. Line Removal d. Monitor	PG&E does not set separate targets for the initiatives that are included in CH-12. We have provided estimates for the 2020-2028 WMP. For clarity, emergency information is not included because these are not part of the Covered and Line Removal - Distribution Initiative (CH-12) initiative. Instead, remote grid enables the removal of lines and is included in the line removal activity. See attached "WMP Discovery 2020-2028_DR_OESB_001-Q017A.xlsx" sheet with the following table contents available in Tab A, B, and X:	Nathan Poon	4/8/2025	4/11/2025	4/11/2025	https://www.pge.com/assets/pge/docs/outage-and-safety/vm-outage-and-safety-procedures-and-support/V2024-0128-OESB_001.pdf	1	No	8	Grid Design, Operations, and Maintenance	8.2.18.2.58.2.7
28	OESB	001	OESB_001	18	No	OESB_001_018	Regarding fire transmission power lines On page 108 of the WMP, PG&E states "PG&E will monitor the need for replacement of transmission lines?" a. Do any of these fire transmission lines run parallel, and if close proximity to energized transmission lines? b. Are any of these fire transmission lines planned for removal in 2025 to 2028? c. If yes, provide targets for 2025, 2027, and 2028. d. If no, explain why. e. If yes, explain why. f. Explain if any of these lines could become energized through induction.	a. PG&E has three side transmission lines totaling 2.25 miles of HFTD and HFRA. One of these lines runs parallel and close to energized transmission lines. b. NA c. NA d. NA e. PG&E plans to remove one of the lines in 2025. The third line is not planned for removal at this time but is being evaluated for the optimal relocation/migration option. f. Only one of the lines has sections that could become energized through induction. These sections are sections of HFTD and HFRA, and PG&E is evaluating induction mitigation WMP Discovery 2020-2028_DR_OESB_001-Q018 Page 2 g. Explain to reduce the risk of the line becoming energized through induction: • PG&E has not set separate targets for activities designated as "Fire Related" or "Community Related." These maintenance areas are not set, but are subject to response to the conditions. Currently, 10 miles of Community Related work are scheduled in 2025 in the System Hardening - Underpinning initiative CH-12. We do not have any additional forecasts for Fire or Community Related. See the table below for the requested information: WMP Discovery 2020-2028_DR_OESB_001-Q019 Page 2 2020-2028 Fire Community Related? Fire Community										

65	CEIS	002	CEIS_002	11	No	CEIS_002_011	Regarding PG&E 2006-2028-2012 Identification of High-Risk Species for Protected Tree Inspections On page 591 of its 2006-2028 WMP, PG&E defines "criteria for determining which [tree] species warrant increased scrutiny during Protected Tree inspections and other inspections." PG&E states that "provides Vegetation Management Inspections (VMI) historical outage data and developed a "historical [tree] status the use to inform the circuit or CPZ level to use historical outage and ignition causes by species, diameter, and failure." a. Is PG&E able to calculate outage and ignition probabilities by tree species at the CPZ level?	4. PG&E has calculated outage probability by tree species at the eco-region level. There is not enough data at the CPZ level to confidently adjust the outage or ignition probability of tree species at such a granular level. 5. PG&E has calculated the probability of tree species at the eco-region level in 2025. At present, we are not able to use this information to inform our vegetation management program. 6. No.	Neither Person	4/1/2025	4/16/2025	4/16/2025	https://www.pge.com/assets/pge/Docs/Outages_and_Ignition/Outage_and_Ignition/2025-0416_002.pdf	0	No	ACI PG&E-206-15	ACI PG&E-206-15	ACI PG&E-206-15
67	CEIS	002	CEIS_002	12	No	CEIS_002_012	Regarding Integrated Vegetation Management (VMI-15) On page 594 of its 2006-2028 WMP, PG&E states that "VMI (Transmission Integrated Vegetation Management) L200M data... assesses vegetation conditions by species Transmission lines (E1, L1)." On page 596, PG&E reports 17,000 miles annually for its Resilient Transmission Patrol (VM-13), and 3,623 circuit miles annually for its Transmission Hazard Patrol (VM-14). a. Is the Resilient Transmission Patrol (VM-13) and the Transmission Hazard Patrol (VM-14) also capture the L200M data used for TVMP? b. List the number of circuit miles PG&E inspects annually using L200M to assess transmission rights-of-way for VMI.	1. Yes, TVMP utilizes the same L200M collection for Resilient Transmission Patrol (VM-13) and Transmission Hazard Patrol (VM-14). 2. The circuit mileage used to assess transmission rights-of-way for VMI (VM-13) are the same as the circuit mileage assessed for Resilient Transmission Patrol (VM-13). 3. PG&E inspects approximately 17,000 circuit miles systemwide. 4. From 2006-2028, we are not able to capture imagery for the Transmission Hazard Patrol program. 5. PG&E does not collect any other remote sensing data besides ortho-imagery during Transmission Hazard Patrol (VM-14).	Neither Person	4/1/2025	4/16/2025	4/16/2025	https://www.pge.com/assets/pge/Docs/Outages_and_Ignition/Outage_and_Ignition/2025-0416_002.pdf	0	No	9	Vegetation Management & Inspections	9.7
68	CEIS	002	CEIS_002	13	No	CEIS_002_013	Regarding risk model documentation a. Page 4 of PG&E's Distribution Event Probability Models Version 4 (DEPM-v4) Documentation includes "R&A Algorithms and Methodology" under the list of documents as part of the documentation suite for the Wildlife Distribution Risk Model (WDRM-v4). Provide a copy of the document. b. Figure 4-1: R&A Process Flow - WDRM-v4 page 25 of PG&E's Wildlife Distribution Risk Model Version 4 (WDRM-v4) Documentation shows that the following components are not included in the WDRM plan: Resilient Consequence Update, Public Safety Risk Model-v2, Insulation Risk Model-v1, Public Safety Consequence-v2, and Reliability Consequence-v1. c. Why are these components not included in WDRM plans? d. Provide documentation that captures and discusses these components, similar to the documentations provided for the WDRM-v4, WDRM-v3, and WDRM-v2.	1. "See 'WMP-Discovery2026-2028_DR_CEIS_002-0217A0161.pdf'. 2. The Insulation Consequence model is a model developed for the WDRM but is not completed. It will be documented with the other Insulation models, which are separate from the WDRM. 3. Models for Reliability and Public Safety risk are separate from the WDRM models. They are developed to help inform internal investment planning primarily outside of HFDT. 4. Reliability and Public Safety risk models are not considered components of the WDRM and are not currently used for wildlife mitigation planning.	Neither Person	4/1/2025	4/2/2025	4/2/2025	https://www.pge.com/assets/pge/Docs/Outages_and_Ignition/Outage_and_Ignition/2025-0416_002.pdf	1	No	Appendix B	Supporting Documentation for Risk Methodology	Appendix B
69	CEIS	002	CEIS_002	14	No	CEIS_002_014	Regarding suppression and agency impacts On page 595 of PG&E's Wildlife Consequence Model Version 4 (WCM-v4) Documentation, PG&E states that "This was not the original expectation for adding the Wildlife Suppression and public Egress impacts, resulting in additional efforts to validate the results and confirm the model development," when discussing the adjusted consequence curve and associated work to mitigate 60% of the wildfire risk. a. How did PG&E calculate the releases associated with mitigating 60% of the wildfire risk? b. What "additional efforts" were completed for model development as a result of this finding? c. How did any efforts resulting in response to this validation impact the consequence curve? Provide copies of the curve before and after. d. Provide a step-by-step process showing how PG&E calculated the associated mitigation of work needed to mitigate 60% of the wildfire risk before and after.	1. The jobs were generated by creating risk ratings for all circuit segments with associated conductor events within the PG&E territory using approximated risk values. Approximated risk values were calculated using release candidate asset condition data that was converted to rated values for simplified computing and aggregation multiplied times the base and adjusted consequence values. Processing the circuit segments in order of their risk rank, each circuit segment's summed risk value, as a percentage of summed risk in the service territory, was sequentially subtracted from 100% to form the data series for the curve values for the baseline curve. The data series was then formed by creating a running total of risk for each selected circuit segment. WMP-Discovery 2026-2028_DR_CEIS_002-0217A Page 2 2. The evidence highlighted from the Wildlife Consequence Model-v4 documentation indicates that incorporating the agency and suppression impacts on wildfire consequence resulted in risk baseline curve that showed that the number of miles that needed to be underpenned to mitigate 60% of the wildfire risk was higher than anticipated. As a result of this finding, the team identified extra validation to confirm the results by reanalyzing against historical data. The additional validation resulted in the removal of several lighting data from the consequence warning data set and described in Section 3.2.4.0 and 3.2.4.0 of the consequence documentation. In the end, the team concluded that the general flattening of the risk system curve when adjusting consequence for agency and suppression impacts was correct outcome. 3. As stated above in b), lightning fires were taken out of the historical fire data and used to calibrate the wildfire consequence model as they skewed results for fires inflated on non-historic destructive weather days, which resulted in slightly steeper baseline curve for both base and adjusted consequence. No changes were made that affected the Egress or Suppression impacts for the adjusted consequence. The relative differences between the base and adjusted consequence curves remained as depicted in Figure 20. 4. The wildfire consequence was described in the response for 69.1A. Many of the corrective actions generated by single incidents are focused on the single incidents and do not directly lead to changes in PG&E's wildfire mitigation efforts. However, PG&E continues to invest in a variety of measures to enable corrective actions, including corrective actions associated with some of PG&E's wildfire mitigation programs. The corrective actions listed below, which did lead to changes in wildfire mitigation efforts, are based on third analysis across many incidents along with input from subject matter experts who contribute to the investigation. The table below includes the mitigation efforts that have resulted from analyzing events generated from the ignition investigation have along with various external ignitions associated with these corrective actions and causes thereof. Corrective Action Example Associated Release Cause Location Improvements to High Impedance Fault Protection (including implementing lower impedance ground line) Firebreaks and high-20230530, 20230562, 20230563, 20230574, 20230592, 20230593, 20230594, 20230595, 20230596, 20230597, 20230598, 20230599, 20230600, 20230601, 20230602, 20230603, 20230604, 20230605, 20230606, 20230607, 20230608, 20230609, 20230610, 20230611, 20230612, 20230613, 20230614, 20230615, 20230616, 20230617, 20230618, 20230619, 20230620, 20230621, 20230622, 20230623, 20230624, 20230625, 20230626, 20230627, 20230628, 20230629, 20230630, 20230631, 20230632, 20230633, 20230634, 20230635, 20230636, 20230637, 20230638, 20230639, 20230640, 20230641, 20230642, 20230643, 20230644, 20230645, 20230646, 20230647, 20230648, 20230649, 20230650, 20230651, 20230652, 20230653, 20230654, 20230655, 20230656, 20230657, 20230658, 20230659, 20230660, 20230661, 20230662, 20230663, 20230664, 20230665, 20230666, 20230667, 20230668, 20230669, 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94	SPO	001	SPO_001	21	No	SPO_001_Q21	SPO is attempting to compute the cost per unit for many of the WMP initiatives tracked 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 up of the initiatives 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 Initiative data 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?	Please see attachment "WMP-Discovery2020-2028_DR_SPO_001-Q21Revised.xlsx" for the requested information. The values provided in the Excel file section titled "PGE Response" represent PGE's responses to the data request using the formulae and data sources provided in 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 opposed to forecasted) costs as reported in our 2024 Annual Report on Compliance (ARC). * PGE has updated "Unit Price/Unit Completed" for the year 2024 to reflect final unit costs reported in our 2024 and 2024 ARC. * Initiatives GH01 (System Hardening) and GH04 (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 "GH01 & GH04 Unit Cost" in attachment "WMP-Discovery2020-2028_DR_SPO_001-Q21Revised.xlsx". The 2023 and 2024 unit costs are from historically completed projects. The 2025 unit costs are predominantly based on forecasts with a current exception that contains more noise than legacy. (1) WMP Planning, Classification: As approved in the 2023 WMP, the GH 01 initiative includes the System Hardening (undergrounding) risks, 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 GH01 in order to not double-count these costs reported in GH04. The System Hardening (undergrounding) risks, however, are reported in Table 11 of the QDR and ARC. Therefore, the approach to divide cost spent per year by the risks is not appropriate. (2) WMP Planning, Classification: As approved in the 2023 WMP, the GH 01 initiative includes the System Hardening (undergrounding) risks, 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 GH01 in order to not double-count these costs reported in GH04. The System Hardening (undergrounding) risks, however, are reported in Table 11 of the QDR and ARC. Therefore, the approach to divide cost spent per year by the risks is not appropriate.	Eddie Schmitt	4/15/2025	5/7/2025	5/7/2025	https://www.pge.com/assets/your/docs/undergrounding-preparation-and-support/2020-2028-SPO_001.pdf	1	No	3	Overview of WMP	3.6
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 tracked 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 up of the initiatives 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 Initiative data 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?	Please see attachment "WMP-Discovery2020-2028_DR_SPO_001-Q21Revised.xlsx" for the requested information. The values provided in the Excel file section titled "PGE Response" represent PGE's responses to the data request using the formulae and data sources provided in 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 opposed to forecasted) costs as reported in our 2024 Annual Report on Compliance (ARC). * PGE has updated "Unit Price/Unit Completed" for the year 2024 to reflect final unit costs reported in our 2023 and 2024 ARC. * Initiatives GH01 (System Hardening) and GH04 (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 "GH01 & GH04 Unit Cost" in attachment "WMP-Discovery2020-2028_DR_SPO_001-Q21Revised.xlsx". The 2023 and 2024 unit costs are from historically completed projects. The 2025 unit costs are predominantly based on forecasts with a current exception that contains more noise than legacy. (1) WMP Planning, Classification: As approved in the 2023 WMP, the GH 01 initiative includes the System Hardening (undergrounding) risks, 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 GH01 in order to not double-count these costs reported in GH04. The System Hardening (undergrounding) risks, however, are reported in Table 11 of the QDR and ARC. Therefore, the approach to divide cost spent per year by the risks is not appropriate. (2) WMP Planning, Classification: As approved in the 2023 WMP, the GH 01 initiative includes the System Hardening (undergrounding) risks, 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 GH01 in order to not double-count these costs reported in GH04. The System Hardening (undergrounding) risks, however, are reported in Table 11 of the QDR and ARC. Therefore, the approach to divide cost spent per year by the risks is not appropriate.	Eddie Schmitt	4/15/2025	5/22/2025	5/22/2025	https://www.pge.com/assets/your/docs/undergrounding-preparation-and-support/2020-2028-SPO_001.pdf	1	No	3	Overview of WMP	3.6
95	SPO	001	SPO_001	22	No	SPO_001_Q22	The 2020-2028 WMP states on page 152 that the System Hardening Project Scoping Decision Tree and Process is shown in Figure PGEAE-6.2.1.1, PGEAE-6.2.1.2, and PGEAE-6.2.1.3 will begin to inform the selection of projects in 2027. What methodology is being used for 2027?	Information in the WMP document, 2020-2028 WMP, states that the System Hardening Project Scoping Decision Tree and Process is shown in Figure PGEAE-6.2.1.1, PGEAE-6.2.1.2, and PGEAE-6.2.1.3 will begin to inform the selection of projects in 2027. What methodology is being used for 2027? The System Hardening Project Scoping Decision Tree and Process is shown in Figure PGEAE-6.2.1.1, PGEAE-6.2.1.2, and PGEAE-6.2.1.3 will begin to inform the selection of projects in 2027. What methodology is being used for 2027?	Eddie Schmitt	4/15/2025	4/18/2025	4/18/2025	https://www.pge.com/assets/your/docs/undergrounding-preparation-and-support/2020-2028-SPO_001.pdf	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 page 125 of PGEAE's 2020-2028 WMP (Figure PGEAE-6.1.3.1-4) and the decision tree on page 185-186 (Figure PGEAE-6.2.1.1, PGEAE-6.2.1.2, and PGEAE-6.2.1.3) 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 a given circuit segment. The examples should extend all of the system hardening initiatives made possible by these four decision trees.	The System Hardening Project Scoping Decision Tree and Process is shown in Figure PGEAE-6.2.1.1, PGEAE-6.2.1.2, and PGEAE-6.2.1.3 will begin to inform the selection of projects in 2027. What methodology is being used for 2027? The System Hardening Project Scoping Decision Tree and Process is shown in Figure PGEAE-6.2.1.1, PGEAE-6.2.1.2, and PGEAE-6.2.1.3 will begin to inform the selection of projects in 2027. What methodology is being used for 2027?	Eddie Schmitt	4/15/2025	4/18/2025	4/18/2025	https://www.pge.com/assets/your/docs/undergrounding-preparation-and-support/2020-2028-SPO_001.pdf	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-Q006, PGEAE references the Wildfire Benefit Cost Analysis (WBCA) Tool. Provide a description of the WBCA Tool as referenced in PGEAE's 5th Revision to its 2020-2028 WMP on page 422 and on page 157 of its 2020-2028 WMP that includes the following: A. An explanation of how the Tool complies with the requirements of 0.23-02-027. B. An explanation of how the Tool complies with the requirements of 0.24-05-064. C. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. D. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. E. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. F. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. G. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. H. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. I. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. J. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. K. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. L. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. M. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. N. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. O. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. P. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. Q. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. R. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. S. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. T. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. U. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. V. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. W. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. X. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. Y. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427. Z. A list of the initiatives that are impacted by PGEAE's 5th Revision to its 2020-2028 WMP on page 427.	The System Hardening Project Scoping Decision Tree and Process is shown in Figure PGEAE-6.2.1.1, PGEAE-6.2.1.2, and PGEAE-6.2.1.3 will begin to inform the selection of projects in 2027. What methodology is being used for 2027? The System Hardening Project Scoping Decision Tree and Process is shown in Figure PGEAE-6.2.1.1, PGEAE-6.2.1.2, and PGEAE-6.2.1.3 will begin to inform the selection of projects in 2027. What methodology is being used for 2027?	Eddie Schmitt	4/15/2025	4/25/2025	4/25/2025	https://www.pge.com/assets/your/docs/undergrounding-preparation-and-support/2020-2028-SPO_001.pdf	0	No	5	Risk Methodology & Assessment	5.4
98	SPO	001	SPO_001	25	No	SPO_001_Q25	State the things where PGEAE has used the Wildfire Benefit Cost Analysis Tool (i.e., RAMP, GRAC, WAMP, other proceedings or things). A. Does PGEAE intend to apply the Wildfire Benefit Cost Analysis Tool in its 2027 Test Year GRAC Application? B. If yes, explain why not. C. If yes, explain how this tool will be applied to the 2027 Test Year GRAC Application. D. Which initiatives presented in the 2024 RAMP Application will be impacted by PGEAE's use of the Wildfire Benefit Cost Analysis Tool when PGEAE files its 2027 Test Year GRAC Application?	The System Hardening Project Scoping Decision Tree and Process is shown in Figure PGEAE-6.2.1.1, PGEAE-6.2.1.2, and PGEAE-6.2.1.3 will begin to inform the selection of projects in 2027. What methodology is being used for 2027? The System Hardening Project Scoping Decision Tree and Process is shown in Figure PGEAE-6.2.1.1, PGEAE-6.2.1.2, and PGEAE-6.2.1.3 will begin to inform the selection of projects in 2027. What methodology is being used for 2027?	Eddie Schmitt	4/15/2025	4/18/2025	4/18/2025	https://www.pge.com/assets/your/docs/undergrounding-preparation-and-support/2020-2028-SPO_001.pdf	0	No	5	Risk Methodology & Assessment	5.4

117	TURN	003	TURN_003	6	No	TURN_003_Q6	Please provide recorded and forecasted red flag warning circuit mile data from 2002-2028 on an annual basis in PG&E's HFTD. Please define "forecast" as the assumption for PG&E's risk modeling, if available.	Please see "WSP-Disclosure2028-2028_DR_TURN_003-Q000AHSOT" sheet for recorded red flag warning circuit mile data from 2013 - 41502028 broken out by year. PG&E does not include "forecasted" for red flag warning circuit-mile data in its risk modeling.	Raina Yemphile	4/17/2025	4/22/2025	4/22/2025	https://www.pge.com/assets/pge/docs/subpages_and_urls/invoke-experience-and-support?file=PGES%20TURNS_003_Q01.xls	1	No	5	Risk Methodology & Assessment	5.3																																																																																				
118	TURN	003	TURN_003	7	No	TURN_003_Q7	In one Excel workbook, please provide the annual number of ignitions caused by PG&E equipment from 2010-2028 in PG&E's HFTD for indicating which area is in the HFTD with supporting data and calculations. Please also include: a. The date of each ignition. b. Owner of the ignition (owner). c. Structures destroyed. d. Facilities vector or impact. e. Whether there was red flag warning at the time of the ignition. f. Any other information readily available and used by PG&E in its risk modeling.	Please see "WSP-Disclosure2028-2028_DR_TURN_003-Q001AHSOT" sheet for the requested information.	Raina Yemphile	4/17/2025	4/22/2025	4/22/2025	https://www.pge.com/assets/pge/docs/subpages_and_urls/invoke-experience-and-support?file=PGES%20TURNS_003_Q02.xls	1	No	5	Risk Methodology & Assessment	5.2.1																																																																																				
119	TURN	003	TURN_003	8	No	TURN_003_Q8	Regarding the mitigation effectiveness of covered conductor: a. Please provide all studies known to PG&E that calculate the mitigation effectiveness of covered conductor using data either from SAE experiments b. From 2002-2028 on an annual basis, please provide the number of faults per mile on lines with covered conductor versus those without covered conductor in PG&E's HFTD. c. From 2002-2028 on an annual basis, please provide the number of lightning pole mile on lines with covered conductor versus those without covered conductor in PG&E's HFTD.	a. Please see PG&E's response titled "RAMP-2024_DR_TURN_006-0004" provided to TURN on September 10, 2024. For further details regarding an example analysis of covered conductor mitigating lightning effectiveness and details about why PG&E does not support application of the analysis. These documents are: - Faults on PG&E's covered conductor installed after the event in wildfire rebuild areas in the absence of significant vegetation growth - Limited investigation of results due to forest installation - Targeted installation in areas areas of low tree strike risk in alignment with PG&E's service line Please note that the analysis was based on only two known representative ignitions on covered conductors. PG&E has subsequently identified an additional ignition related to covered conductor which occurred in 2022. PG&E is also performing with UCLA on an observed effectiveness study for covered conductor but has not yet operationalized the methodology due to the limited data availability in addition to the key points reflected above. b. Please see the table below for the volume of faults per mile of PG&E's overhead conductors in HFTDs. Please note that PG&E interprets "faults" as outages, which are drawn from the Integrated Lightning Information System ("LIS"). LIS records do not capture the type of issue, not PG&E is not able to differentiate between covered or bare conductor. As a result, PG&E is providing the outages per HF TD pole mile of conductor. c. Please see the following table for the volume of ignitions per mile of PG&E's overhead covered vs non-covered conductor in the HFTD/HFRA. Please note that we do not track ignitions by covered conductor file. However, we estimate the following values for ignitions per pole mile of overhead covered conductors in the HFTD, based on the number of fault ignitions in each year and the pole miles of overhead covered conductor in the HFTD/HFRA at the close of each year. As such, the values may vary like future representations, as measured installation data differs from SAE controlled experimental data. <table><tr><th>Year</th><th>Covered Conductor Pole Miles</th><th>Overhead Covered Ignitions</th></tr><tr><td>2002</td><td>1,100</td><td>1</td></tr><tr><td>2003</td><td>1,100</td><td>1</td></tr><tr><td>2004</td><td>1,100</td><td>1</td></tr><tr><td>2005</td><td>1,100</td><td>1</td></tr><tr><td>2006</td><td>1,100</td><td>1</td></tr><tr><td>2007</td><td>1,100</td><td>1</td></tr><tr><td>2008</td><td>1,100</td><td>1</td></tr><tr><td>2009</td><td>1,100</td><td>1</td></tr><tr><td>2010</td><td>1,100</td><td>1</td></tr><tr><td>2011</td><td>1,100</td><td>1</td></tr><tr><td>2012</td><td>1,100</td><td>1</td></tr><tr><td>2013</td><td>1,100</td><td>1</td></tr><tr><td>2014</td><td>1,100</td><td>1</td></tr><tr><td>2015</td><td>1,100</td><td>1</td></tr><tr><td>2016</td><td>1,100</td><td>1</td></tr><tr><td>2017</td><td>1,100</td><td>1</td></tr><tr><td>2018</td><td>1,100</td><td>1</td></tr><tr><td>2019</td><td>1,100</td><td>1</td></tr><tr><td>2020</td><td>1,100</td><td>1</td></tr><tr><td>2021</td><td>1,100</td><td>1</td></tr><tr><td>2022</td><td>1,100</td><td>1</td></tr><tr><td>2023</td><td>1,100</td><td>1</td></tr><tr><td>2024</td><td>1,100</td><td>1</td></tr><tr><td>2025</td><td>1,100</td><td>1</td></tr><tr><td>2026</td><td>1,100</td><td>1</td></tr><tr><td>2027</td><td>1,100</td><td>1</td></tr><tr><td>2028</td><td>1,100</td><td>1</td></tr></table> a. As discussed in responses to TIFRCQA Q01, PG&E will recalculate CRRs for projects planned to be completed in 2028 and analyses was in line with the Risk Based Decision-Making Framework, Phase 2 Decision 1. That did not require project-level CRR calculations. PG&E will use elements of the WEBCA to perform a cost-benefit analysis during scoring for work to be completed in 2027 and 2028 however, that analysis had not been initiated at the time of our 2026-2028 WMP submission. Preliminary CRRs have been estimated, as seen in previous DRP response (DRS-003_Q03), which included costs associated with the 2026-2028 WMP are presented at the programmatic level. Those CRR calculations are considered with those that will be prepared in the DEC and are integrated using the Enterprise Risk Model. These models include our wildfire and usability benefits and evaluate the risk reduction benefits based on location of work and program effectiveness. Additionally, these cost-benefit ratios account for the entire benefit life of the projects and present value (10.20-10.40). WSP-Disclosure 2028-2028_DR_TURN_003-Q000 Page 2 of various requirements (PDRS) for our state, state see section 6.2.1.2 Cost Benefit Review of PG&E WMP Plan R 2028-2028. i. NA ii. NA iii. NA	Year	Covered Conductor Pole Miles	Overhead Covered Ignitions	2002	1,100	1	2003	1,100	1	2004	1,100	1	2005	1,100	1	2006	1,100	1	2007	1,100	1	2008	1,100	1	2009	1,100	1	2010	1,100	1	2011	1,100	1	2012	1,100	1	2013	1,100	1	2014	1,100	1	2015	1,100	1	2016	1,100	1	2017	1,100	1	2018	1,100	1	2019	1,100	1	2020	1,100	1	2021	1,100	1	2022	1,100	1	2023	1,100	1	2024	1,100	1	2025	1,100	1	2026	1,100	1	2027	1,100	1	2028	1,100	1	Raina Yemphile	4/17/2025	4/22/2025	4/22/2025	https://www.pge.com/assets/pge/docs/subpages_and_urls/invoke-experience-and-support?file=PGES%20TURNS_003.xls	0	No	8	Grid Design, Operations, and Maintenance	8.2.1
Year	Covered Conductor Pole Miles	Overhead Covered Ignitions																																																																																																				
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120	TURN	003	TURN_003	9	No	TURN_003_Q9	For each project proposed from 2026-2028 for LG and CC, please provide the following in Excel with all supporting data, calculations, and assumptions: a. Cost/benefit ratio of LG and CC for each project, indicating which mitigation was chosen (LG or CC). b. This should include unit costs assumed for each mitigation. c. This should include number of overhead miles of each project. d. This should include total risk and risk reduction from the project.	PG&E does not use weather years wind speed thresholds for PSPF execution. Please see the Section 5 of the WMP. Instead, PG&E uses a risk-informed methodology that combines the probability of an ignition (Ignition Probability Weather model (IPW)) with the probability of rapid fire spread (Fire Spread Index Model (FSI)). The IPW model is informed by a machine learning outage model called CPWF, that has been trained on historical data of CPWF events across the entire network, considering both meteorological, topographic and asset information. This, along with forecasts from covered conductor vegetation management, or any other program that would reduce the probability of an outage is reflected in the actual grid performance in localized areas where the model is trained on. Thus, we do not rely on wind speed threshold measures for grid hardening, vegetation management or any other program that could reduce outage or ignition risk outside the CPWF model, nor do we have to make any assumptions or estimates about the effectiveness of such programs in their apply across all districts. To ensure our model is reflective of the latest grid performance, we annually update the model with the last year of performance versus weather data and utilize an exponential function (which was calibrated to provide the best performance), that weights for most recent years most heavily in final model predictions.	Raina Yemphile	4/17/2025	4/22/2025	4/22/2025	https://www.pge.com/assets/pge/docs/subpages_and_urls/invoke-experience-and-support?file=PGES%20TURNS_003.xls	0	No	8	Grid Design, Operations, and Maintenance	8.2.1																																																																																				
121	TURN	003	TURN_003	10	No	TURN_003_Q10	Section 6.2.1, Page 155 states "In any given location, overhead hardware does not reduce the impact from PSPF events, but it is expected to reduce EPDS-covered outages." Please explain why PG&E has not installed higher wind speed thresholds for overhead hardware circuits, which reduces the probability of PSPFs, as Southern California Edison has done. Please respond the response with all analysis and data regarding potential consequences between SCE and PG&E's service territory or overhead hardware programs.	PG&E does not use weather years wind speed thresholds for PSPF execution. Please see the Section 5 of the WMP. Instead, PG&E uses a risk-informed methodology that combines the probability of an ignition (Ignition Probability Weather model (IPW)) with the probability of rapid fire spread (Fire Spread Index Model (FSI)). The IPW model is informed by a machine learning outage model called CPWF, that has been trained on historical data of CPWF events across the entire network, considering both meteorological, topographic and asset information. This, along with forecasts from covered conductor vegetation management, or any other program that would reduce the probability of an outage is reflected in the actual grid performance in localized areas where the model is trained on. Thus, we do not rely on wind speed threshold measures for grid hardening, vegetation management or any other program that could reduce outage or ignition risk outside the CPWF model, nor do we have to make any assumptions or estimates about the effectiveness of such programs in their apply across all districts. To ensure our model is reflective of the latest grid performance, we annually update the model with the last year of performance versus weather data and utilize an exponential function (which was calibrated to provide the best performance), that weights for most recent years most heavily in final model predictions.	Raina Yemphile	4/17/2025	4/22/2025	4/22/2025	https://www.pge.com/assets/pge/docs/subpages_and_urls/invoke-experience-and-support?file=PGES%20TURNS_003.xls	0	No	8	Grid Design, Operations, and Maintenance	8.2.1																																																																																				
122	OERIS	004	OERIS_004	1	No	OERIS_004_Q1	Regarding Third-Party Model Review a. Page 12 of the 12 review slides that "The main driver for consequence in the FPI score which further reduces the impacts of the in-depth simulations coming from the Technophys analysis." On page 15 of the Wildfire Consequence Mitigation Model V4 document, two criteria are mentioned for the predictive destructive criteria, one for FPI-R and one for the Technophys simulations. List of the simulated weather history from many days from 2012 through 2022 have not each criterion in the highest risk scenario? b. Provide a detailed description of how FPI-R compared to predictive destructive criteria influence the consequence scores.	The values for "predicted destructive" were computed for every 1500000m meter pixel containing grid infrastructure. We confirmed that the requests for the tabulation of days where at least one grid pixel containing grid of each high-risk asset experienced one of the "predicted destructive" criteria. We have the 30-day record regression for the "predicted destructive" criteria. We have the 30-day record regression for the "predicted destructive" criteria. We have the 30-day record regression for the "predicted destructive" criteria. We have the 30-day record regression for the "predicted destructive" criteria. WSP, on those were used for the analysis, the results of which are tabulated in WSP-Disclosure2028-2028_DR_OERIS_004-Q002AHSOT sheet in the spreadsheet titled "Predicted destructive days." b. The predicted destructive criteria does not have different sources of information. c. The predictions of the FPI model, an empirical model trained on historical fire outcomes conditioned on weather and environmental conditions, use 1-5 Record-4s are classified as predicted destructive conditions. The R score expresses how likely a destructive fire is, given the input conditions. based on model fit using outcomes of historical fires. These values are available and adopted by the vt wildfire consequence model for at 103 WSP-Disclosure 2028-2028_DR_TURN_001-Q001 Page 2 days of the June-November wildfire season annually from 2012 through 2022. d. The false weight and rate of spread produced by wildfire simulations run by Technophys across all grid locations. These metrics describe how likely are the following simulated fires, even, with treatments for predicted destructive events include all the values subject by simulations of historically destructive fires. For the vt model, and its history with past practice, the simulations were performed across the list of west wildfire conditions days identified by PG&E's meteorology team from the weather data for each year. There are approximately 30 such days with simulation data available each year, with data spanning 2012 through 2020 available at the time of vt model finalization. Other source of data is sufficient to label conditions as "predicted destructive". The FPI model is probabilistic and based to past outcomes, which is the source of data is sufficient to label conditions as "predicted destructive". The FPI model is probabilistic and based to past outcomes, which is the source of data is sufficient to label conditions as "predicted destructive". The FPI model is probabilistic and based to past outcomes, which is the source of data is sufficient to label conditions as "predicted destructive". The FPI model is probabilistic and based to past outcomes, which is the source of data is sufficient to label conditions as "predicted destructive". The FPI model is probabilistic and based to past outcomes, which is the source of data is sufficient to label conditions as "predicted destructive". 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Page 16

191	SPO	004	SPO_004	27	No	SPO_004_Q27	List all the feasibility constraints that are relevant to the decision trees found in Figures PG&E-8.2.1-1, PG&E-8.2.1-2, and PG&E-8.2.1-3 in the 2020-2028 Base WMP. a) How are these feasibility constraints operationalized within these decision trees? b) How are these feasibility constraints quantified? c) How are these feasibility constraints addressed in PG&E's Cost Benefit Analysis?	PG&E objects that the request is overbroad because there are many potential feasibility constraints depending on the specific circumstances of a project. PG&E objects that a) the relevance range of feasibility constraints that may be considered in the design of undergrounding, control construction, and the relevant project is, it is impractical, if not impossible, to enumerate all potential factors. Therefore, although the list provided below attempts to thoroughly and fully capture feasibility constraints that significantly impact the program, it may not be an exhaustive list. Below are primary examples of feasibility constraints considered within the scoping process: • High-voltage dependencies and permitting requirements from federal, state and local agencies. • Soil impacts, such as grade-related rock, wetland crossings, fish, cultural and environmental. • Terrain impacts, such as the need for retaining walls, grading/enclosures, and vegetation removal. • Adhesions and other constraints that are known to exist in the project scope. • Construction or restoration restrictions such as lost trees, wetting walls, and special equipment. • Equipment and customer engagement limitations to building the scope. • Constructability of alternatives whether it be due to overhead limitations or subgrade. A. Feasibility constraints are operationalized within the decision tree starting with a lead engineer who conducts a feasibility study review and determines a preliminary proposed scope that we compare to available alternatives. This preliminary proposed scope is used not as a greater scoping team who completes a combination of field and desktop reviews targeted at the locations proposed for work. The various reviews are initiated in a desktop scoping meeting where the proposed scope may be modified to ensure constructability and to address dependencies that may impact timing and cost. B. Feasibility constraints influence the construction risk of projects. For example, if there is a steep slope or significantly hard rock, the risk will be adjusted based on the location of the constraints. Cost-related feasibility factors are incorporated into the construction risk assessment. C. To date the CPUC has not adopted a risk tolerance standard. Accordingly, we do not rely on any determination by PG&E or the CPUC regarding a risk tolerance standard as a basis for our proposed mitigation strategies. However, if a program or mitigation strategies we employ our professional experience, expertise, and prudent engineering judgment to determine the level of safety risk we accept. We do not assert that these risk levels are "reasonable." As the ALJ ruling correctly points out, and PG&E agrees, the level of safety risk that PG&E's tolerance standard for the program's responsibility. We believe, however, that understanding the potential for catastrophic WMP (Chapters 2020-2028, DR, SPO_004-Q29) Page 2 risk consequences is an important factor to be considered along with cost-benefit analysis. A. There is no mitigation that needs to be reconsidered in light of the order. A specific risk tolerance threshold was not used as a justification for selecting those mitigation strategies. A specific risk tolerance threshold was not used in the decision trees. A. Risk tolerance thresholds have not been integrated into PG&E's mitigation selection process for the 2020-2028 WMP.	Eddie Schmidt	4/30/2025	5/6/2025	5/6/2025	https://www.pge.com/assets/pge/docs/tables_and_figures/tables/operationalization-and-support/2020-2028-spo_004_q27.pdf	0	No	8	Grid Design, Operations, and Maintenance	8.2.1
192	SPO	004	SPO_004	28	No	SPO_004_Q28	On page 124 in the 2020-2028 Base WMP, PG&E states that it has adopted a consistent treatment of risk tolerance in its risk assessment and mitigation options. Is an Administrative Law Judge Ruling about April 22, 2025 in the PG&E 2020-2028 WMP Proceedings (A-20-008)? PG&E was intended to not refer to "risk tolerance" to justify risk mitigation activities in the 2020-2028 Risk Case. a) Explain how risk tolerance was used as a justification for selecting those mitigation strategies. b) Explain what risk tolerance played in the decision trees found in Figures PG&E-8.2.1-1, PG&E-8.2.1-2, and PG&E-8.2.1-3 in the 2020-2028 Base WMP. c) Explain how these decision trees will change in light of the ALJ Ruling. d) Explain any other decision-making procedure, protocol, tool or other approach where a treatment of risk tolerance was integrated into PG&E's mitigation selection process. e) Explain how these approaches will change in light of the ALJ Ruling.	To date the CPUC has not adopted a risk tolerance standard. Accordingly, we do not rely on any determination by PG&E or the CPUC regarding a risk tolerance standard as a basis for our proposed mitigation strategies. However, if a program or mitigation strategies we employ our professional experience, expertise, and prudent engineering judgment to determine the level of safety risk we accept. We do not assert that these risk levels are "reasonable." As the ALJ ruling correctly points out, and PG&E agrees, the level of safety risk that PG&E's tolerance standard for the program's responsibility. We believe, however, that understanding the potential for catastrophic WMP (Chapters 2020-2028, DR, SPO_004-Q29) Page 2 risk consequences is an important factor to be considered along with cost-benefit analysis. A. There is no mitigation that needs to be reconsidered in light of the order. A specific risk tolerance threshold was not used as a justification for selecting those mitigation strategies. A specific risk tolerance threshold was not used in the decision trees. A. Risk tolerance thresholds have not been integrated into PG&E's mitigation selection process for the 2020-2028 WMP.	Eddie Schmidt	4/30/2025	5/6/2025	5/6/2025	https://www.pge.com/assets/pge/docs/tables_and_figures/tables/operationalization-and-support/2020-2028-spo_004_q28.pdf	0	No	5	Risk Methodology & Assessment	5
193	SPO	004	SPO_004	29	No	SPO_004_Q29	Provide a detailed explanation of how PG&E addresses tail risk in its risk models presented in the 2020-2028 Base WMP? a) Is the EORM impacted by PG&E's approach to addressing wildfire tail risk? If so, how? If not, why not? b) Is the WORM impacted by PG&E's approach to addressing wildfire tail risk? If so, how? If not, why not? c) Is the WTRM impacted by PG&E's approach to addressing wildfire tail risk? If so, how? If not, why not?	A. Yes, Wildfire Risk Bowtie Model is impacted by PG&E's approach to addressing wildfire tail risk by using a risk-aware Risk Function (also known as a Risk Selecting Function) which gives a greater weight in the risk model to low frequency, high consequence events than to high frequency, low consequence events. A. Yes, the WORM is impacted by PG&E's approach to addressing wildfire tail risk as it influences the Cost Benefit Analysis (CBA) provided by Enterprise Operational Risk Management. The CBA influences the BMYT that is used as a transform to produce a single data processing step. In turn, impacts the risk values produced by the WORM. A. Yes, the WTRM is impacted by PG&E's approach to addressing wildfire tail risk as it influences the Cost Benefit Analysis (CBA) provided by Enterprise Operational Risk Management. The CBA influences the BMYT that is used as a transform to produce a single data processing step. In turn, impacts the risk values produced by the WTRM. A. Yes, the WTRM is impacted by PG&E's approach to addressing wildfire tail risk as it influences the Cost Benefit Analysis (CBA) provided by Enterprise Operational Risk Management. The CBA influences the BMYT that is used as a transform to produce a single data processing step. In turn, impacts the risk values produced by the WTRM.	Eddie Schmidt	4/30/2025	5/30/2025	5/30/2025	https://www.pge.com/assets/pge/docs/tables_and_figures/tables/operationalization-and-support/2020-2028-spo_004_q29.pdf	0	No	5	Risk Methodology & Assessment	5.4
194	SPO	004	SPO_004	30	No	SPO_004_Q30	Provide a detailed explanation of how PG&E applies the risk scaling function in its risk models presented in the 2020-2028 Base WMP? a) Is the risk scaling function applied to the EORM? If so, how? If not, why not? b) Is the risk scaling function applied to the WORM? If so, how? If not, why not? c) Is the risk scaling function applied to the WTRM? If so, how? If not, why not?	A. Yes, the same risk scaling function used in 2020-2028 WMP is applied to the EORM risk models presented in the 2020-2028 Base WMP. The risk scaling function is used to adjust the risk values of the risk models to reflect the risk scaling function to convert normalized levels of an attribute into risk-adjusted levels of an attribute to prioritize the mitigation of risks. A. Yes, the WORM values are only used for calculating overall utility risk, which combines wildfire risk with outage program risk. For overall utility risk, the WORM of risk results are scaled to match the absolute value of distribution wildfire risk determined by the EORM risk model. This is necessary because WORM produces a set of wildfire, not absolute, risk values, and must be scaled before summing with other types of risks. A. Yes, the WTRM values are only used for calculating overall utility risk, which combines wildfire risk with outage program risk. For overall utility risk, the WTRM of risk results are scaled to match the absolute value of transmission wildfire risk determined by the EORM risk model. This is necessary because WTRM produces a set of wildfire, not absolute, risk values, and must be scaled before summing with other types of risks.	Eddie Schmidt	4/30/2025	5/30/2025	5/30/2025	https://www.pge.com/assets/pge/docs/tables_and_figures/tables/operationalization-and-support/2020-2028-spo_004_q30.pdf	0	No	5	Risk Methodology & Assessment	5.4
195	SPO	004	SPO_004	31	No	SPO_004_Q31	On page 124 in the 2020-2028 Base WMP, PG&E states "PG&E's Investment Planning group leverages the CBA and the RCF to prioritize the proposed investments to achieve risk reduction at a reasonable cost as part of the RCF process." a) How does PG&E leverage CBA to prioritize investments in risk reduction? b) List which non-CBA aspects of the RCF PG&E leverages to prioritize investments in risk reduction. c) Explain how PG&E leverages those non-CBA aspects of the RCF to prioritize investments in risk reduction. d) Define "reasonable cost." Explain how PG&E incorporates "reasonable cost" as a constraint in its risk models.	A. PG&E also tailors the wildfire mitigation to a WMP as consistent with those that will be proposed in the RCF. There is a distinction between CBA forecasting activities and the work planning as described in the WMP. In the RCF, CBA are one component that PG&E utilizes for the purpose of developing its overall funding request across all mitigation programs (see transmission outage program replacement programs, dam safety remediation, wildfire undergrounding, etc.). Hence program-level CBA are determined across all PG&E's functional areas and utilized as described in Exhibit PG&E-2.3, Chapter 1 and Exhibit PG&E-4, Chapter 2 of its 2027 GRC Testimony, which will be filed on May 15, 2025. In the WMP, the portfolio of projects are selected, partly based on program-level CBA, but also based on other factors as described on page 125. In flow 20 of the RCF states that mitigation programs can be selected based on other factors besides their CBA. These factors are: PG&E's obligation to consider Safety as the Top Priority WMP (Chapters 2020-2028, DR, SPO_004-Q31) Page 2 The meaning of PG&E's Prudent Operator Judgment • Modeling Limitations and Uncertainty • Compliance Requirements • Exhibit PG&E-2.3, Chapter 1 of PG&E's 2027 GRC Testimony provides an in-depth discussion on each of these factors. PG&E considers CBA and the factors mentioned above on a case-by-case basis for each of its mitigations and documents the rationale for selecting them in the GRC Testimony. A. PG&E does not rely on a strict definition of "reasonable cost," but considers the circumstances around each of its mitigation programs in the determination of reasonableness. Some programs have reasonable cost based on the risk reduction benefits they provide, i.e., their CBA. Others are reasonable because they are the most economical way to address known vulnerabilities and threats or meet compliance requirements in an efficiency manner.	Eddie Schmidt	4/30/2025	5/13/2025	5/13/2025	https://www.pge.com/assets/pge/docs/tables_and_figures/tables/operationalization-and-support/2020-2028-spo_004_q31.pdf	0	No	3	Overview of WMP	3.6
196	SPO	004	SPO_004	32	No	SPO_004_Q32	On page 125 in the 2020-2028 Base WMP, PG&E explains that SME Judgement is integrated into the process of mitigation selection through "cross-functional working groups." Provide a detailed narrative description of how these cross-functional working groups operate. a) List each type of document or other kinds of information that is created at these cross-functional working groups. b) How are these documents or other kinds of information created? c) Provide an example of each type of document or other kinds of information that was generated by the cross-functional working group when selecting mitigations on critical segment CORNING 110185152. d) Do the working groups evaluate every asset within a critical segment to determine which mitigation should be implemented? e) If so, explain how the team is done. f) If not, explain why not. g) List the steps the SME's review to support the cross-functional working group's decision about which mitigation should be selected at a given circuit segment. h) Explain how the SME's use each of these steps to support the cross-functional working group's decision about which mitigation should be selected at a given circuit segment.	A. During the Cross-Functional Scoping working group, PG&E created the Design Base Memorandum document for each job, which includes information on job location and authorizes having jurisdiction, functional and administrative team roles, design considerations, and the following appendices: • APPENDIX A – ENFORCEMENT NAME & SUPPORTING DOCUMENTS • APPENDIX B – SUBMITTAL NAME • APPENDIX C – SUBORDINATE TABLE • APPENDIX D – HISTORICAL DISPOSITION • APPENDIX E – KEY SKETCHES • APPENDIX F – LINE RISK RISKY COST ANALYSIS (RISKY TOOL OUTPUTS) • APPENDIX G – EC TAG LIST • APPENDIX H – LINE RIGHTS NAME & SUPPORTING DOCUMENTS • APPENDIX I – VEGETATION MANAGEMENT & SUPPORTING DOCUMENTS • APPENDIX J – ENVIRONMENTAL NAME & SUPPORTING DOCUMENTS • APPENDIX K – PUBLIC SAFETY NAME & SUPPORTING DOCUMENTS • APPENDIX L – THE SCHEDULE • APPENDIX M – GLE FACILITY The documents are related to PG&E's Electronic Document Reading System (EDRS). A. CORNING 110185152 is still at the early stages of scoping, and we have not developed the full job package. A. No, we do not evaluate every asset within a circuit segment to determine which mitigation should be evaluated. A. NA. The Scoping working groups evaluate the circuit segment for overall feasibility, regulation risk exposure, constructability, cost estimate, implementation concerns, and any environmental impacts, permitting requirements, and risk reduction benefits to help develop the final mitigation. A. The cross-functional Scoping working group may provide the following insights and recommendations, which would help drive our decision for the mitigation selection. Although the list provided below attempts to thoroughly and fully capture insights and recommendations provided during the working group, it may not be an exhaustive list, and additional factors could be discussed depending on the values of the project. • Land/Encroachment/Environmental – Review work proposal and provides approximate time for land acquisition or permitting based on environmental issues. • Vegetation Safety/Safety (PSS) – Provides recommendations on when to begin to underground based on implementation concerns. • Vegetation – Provides type of enhanced vegetation work required if proceeding with overhead work.	Eddie Schmidt	4/30/2025	5/21/2025	5/21/2025	https://www.pge.com/assets/pge/docs/tables_and_figures/tables/operationalization-and-support/2020-2028-spo_004_q32.pdf	0	No	6	Wildfire Mitigation Strategy Development	6.1.3
197	SPO	004	SPO_004	33	No	SPO_004_Q33	On page 125 in the 2020-2028 Base WMP, PG&E explains that the cross-functional working groups leverage both qualitative risk assessments and qualitative operational insights. Provide a list of the qualitative operational insights. a) Describe how each of these qualitative operational insights can contribute to the mitigation selection. b) Provide an example. Explain how and why each of these qualitative operational insights either did or did not inform the selection of mitigations on critical segment CORNING 110185152. c) Describe how each of these qualitative operational insights are integrated into the decision trees found in Figures PG&E-8.2.1-1, PG&E-8.2.1-2, and PG&E-8.2.1-3 in the 2020-2028 Base WMP. d) Which of the steps in the decision trees reviews these qualitative operational insights? How is that performed?	The following is a list of the key qualitative operational insights used by the cross-functional working groups to inform the mitigation selection process: • High-voltage dependencies and permitting requirements from federal, state and local agencies. • Soil impacts, such as grade-related rock, wetland crossings, fish, cultural and environmental. • Terrain impacts, such as the need for retaining walls, grading/enclosures, and vegetation removal. • Adhesions and other constraints that are known to exist in the project scope. • Construction or restoration restrictions such as lost trees, wetting walls, and special equipment. • Equipment and customer engagement limitations to building the scope. • Constructability of alternatives whether it be due to overhead limitations or subgrade. A. The CORNING 110185152 project is still at the early stages of scoping and PG&E can provide information on the qualitative operational insights across the analysis in complete. A. Qualitative insights on any given project are discussed during the Hybrid Analysis and Desktop Scoping Meeting (Figures 8.2.1-2 and 8.2.1-3). A. During the Desktop Scoping Meeting, the cross-functional team reviews the qualitative insights to answer the question "Are there any constructability dependencies or constructability limitations in the scope of project?" (Figures 8.2.1-2, 8.2.1-3).	Eddie Schmidt	4/30/2025	5/21/2025	5/21/2025	https://www.pge.com/assets/pge/docs/tables_and_figures/tables/operationalization-and-support/2020-2028-spo_004_q33.pdf	0	No	6	Wildfire Mitigation Strategy Development	6.1.3

245	SPO	006	SPO_006	4	No	SPO_006_04	In its response to SPO-004 Question 27, PG&E states "Cost-related feasibility factors are incorporated into cost assumptions as a quantitative cost modifier for each of the seven 'various' examples of feasibility constraints" listed in Question 27. a. Provide the quantitative cost modifier for each of the seven 'various' examples of feasibility constraints" listed in Question 27. b. Explain how PG&E determined the value for each of the quantitative cost modifiers listed in Question 27.	The primary examples of feasibility constraints listed in Question 27 are not an exhaustive list of cost factors that could be applied to a project during scoring. As we proceed through scoring, we may identify additional cost factors or constraints that could influence how we view the expected cost. The cost of the scoring steps is considered an Association for the Advancement of Civil Engineering (AAACE) Class 5 estimate, which is based on limited project information and serves as a preliminary assessment with a potential accuracy range of -50% to +100%. Class 5 estimates are used for strategic planning, evaluating project viability, and comparing different project options. Please refer to "WMP-December2020-2028_DR_SPO_006-004AAACE-CONF.docx" for a breakdown of cost estimates and constraints, including their associated amounts. These costs encompass items related to the feasibility constraints listed in Question 27.	Eddie Schmitt	5/19/2025	6/22/2025	6/22/2025	https://www.pge.com/assets/ghg/docs/tables-and-figures/tables-prepares-and-support/2020-2028-SPO_006.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, PG&E informed SPO that the baseline value of risk used to calculate CBR is different in 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. This should include, for example, with a table that is similar to Table PG&E-8.2.1.2-2 in the 2020-2028 Base WMP. (Per page 182 of the 2020-2028 WMP SPO understands that the decision here will inform mitigation selection beginning in 2027.) b. Provide the total number of circuit segments where PG&E has already applied the decision tree for mitigation both in 2027 and 2028. c. Provide the total number of circuit segments where PG&E intends to apply the decision tree for work done in 2027 and 2028.	a. PG&E-8.2.1.1, PG&E-8.2.1.2, and PG&E-8.2.1.3 in the 2020-2028 Base WMP. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. b. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. c. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028.	Eddie Schmitt	5/19/2025	6/22/2025	6/22/2025	https://www.pge.com/assets/ghg/docs/tables-and-figures/tables-prepares-and-support/2020-2028-SPO_006.pdf	0	No	5	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 different in 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. This should include, for example, with a table that is similar to Table PG&E-8.2.1.2-2 in the 2020-2028 Base WMP. (Per page 182 of the 2020-2028 WMP SPO understands that the decision here will inform mitigation selection beginning in 2027.) b. Provide the total number of circuit segments where PG&E has already applied the decision tree for mitigation both in 2027 and 2028. c. Provide the total number of circuit segments where PG&E intends to apply the decision tree for work done in 2027 and 2028.	a. PG&E-8.2.1.1, PG&E-8.2.1.2, and PG&E-8.2.1.3 in the 2020-2028 Base WMP. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. b. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. c. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028.	Eddie Schmitt	5/19/2025	5/22/2025	5/22/2025	https://www.pge.com/assets/ghg/docs/tables-and-figures/tables-prepares-and-support/2020-2028-SPO_006.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 different in 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. This should include, for example, with a table that is similar to Table PG&E-8.2.1.2-2 in the 2020-2028 Base WMP. (Per page 182 of the 2020-2028 WMP SPO understands that the decision here will inform mitigation selection beginning in 2027.) b. Provide the total number of circuit segments where PG&E has already applied the decision tree for mitigation both in 2027 and 2028. c. Provide the total number of circuit segments where PG&E intends to apply the decision tree for work done in 2027 and 2028.	a. PG&E-8.2.1.1, PG&E-8.2.1.2, and PG&E-8.2.1.3 in the 2020-2028 Base WMP. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. b. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. c. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028.	Eddie Schmitt	5/19/2025	5/28/2025	5/28/2025	https://www.pge.com/assets/ghg/docs/tables-and-figures/tables-prepares-and-support/2020-2028-SPO_006.pdf	1	No	3	Overview of WMP	3.6
248	SPO	006	SPO_006	7	No	SPO_006_07	In SPO-006-017 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-006-017 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-8.2.1.2, CBR and Net Benefit are necessary to determine which PG&E can use the Decision Tree in Figure PG&E-8.2.1.2 in the 2020-2028 Base WMP to determine a system hardening mitigation or a given CPZ. 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 also determines which system hardening mitigation will be selected at a given CPZ.	a. PG&E-8.2.1.1, PG&E-8.2.1.2, and PG&E-8.2.1.3 in the 2020-2028 Base WMP. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. b. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028.	Eddie Schmitt	5/19/2025	5/22/2025	5/22/2025	https://www.pge.com/assets/ghg/docs/tables-and-figures/tables-prepares-and-support/2020-2028-SPO_006.pdf	0	No	3	Overview of WMP	3.6
249	O&S	012	O&S_012	1	No	O&S_012_01	Regarding Emission for Project Expenditures In the 2020-2028 WMP, Section 9.2.3.1 (M&O) states that, "For TMM, previously defined RTOs are reassessed every 2.5 years (p. 388). In response to data request O&S-P-WMP-2020-PGE-001, question 16, PG&E stated "With the availability of L&AR data, vegetation height and density conditions are assessed every year. On page 388, PG&E references Utility Standard T2-11118. In section "Annual Planning," the relevant data that "with plans are created annually," and references the T2009 as "reassessed every 2 to 5 years." In the same standard, PG&E states, "Thresholds for implementing TMM are considered when noncompliance vegetation exceeds 3 feet in height or exceeds 50% ground covered within the managed area."	a. PG&E-8.2.1.1, PG&E-8.2.1.2, and PG&E-8.2.1.3 in the 2020-2028 Base WMP. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. b. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028.	Nathan Poon	5/20/2025	6/5/2025	5/20/2025	https://www.pge.com/assets/ghg/docs/tables-and-figures/tables-prepares-and-support/2020-2028-SPO_012.pdf	1	No	3	Overview of WMP	3.6
250	O&S	012	O&S_012	2	No	O&S_012_02	Regarding Emission for Project Expenditures In the 2020-2028 WMP, Section 9.2.3.1 (M&O) states that, "For TMM, previously defined RTOs are reassessed every 2.5 years (p. 388). In response to data request O&S-P-WMP-2020-PGE-001, question 16, PG&E stated "With the availability of L&AR data, vegetation height and density conditions are assessed every year. On page 388, PG&E references Utility Standard T2-11118. In section "Annual Planning," the relevant data that "with plans are created annually," and references the T2009 as "reassessed every 2 to 5 years." In the same standard, PG&E states, "Thresholds for implementing TMM are considered when noncompliance vegetation exceeds 3 feet in height or exceeds 50% ground covered within the managed area."	a. PG&E-8.2.1.1, PG&E-8.2.1.2, and PG&E-8.2.1.3 in the 2020-2028 Base WMP. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. b. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028.	Nathan Poon	5/20/2025	5/28/2025	5/28/2025	https://www.pge.com/assets/ghg/docs/tables-and-figures/tables-prepares-and-support/2020-2028-SPO_012.pdf	0	No	9	Vegetation Management and Inspections	9
251	O&S	012	O&S_012	3	No	O&S_012_03	O&S: Regarding Table 6-4 In the 2020-2028 WMP, Section 6.4 (from 2020-2028 Base WMP) that included risk reduction inputs to evaluate alternative mitigation at the circuit segment-level. In SPO-006-017 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-8.2.1.2, CBR and Net Benefit are necessary to determine which PG&E can use the Decision Tree in Figure PG&E-8.2.1.2 in the 2020-2028 Base WMP to determine a system hardening mitigation or a given CPZ. 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 also determines which system hardening mitigation will be selected at a given CPZ.	a. PG&E-8.2.1.1, PG&E-8.2.1.2, and PG&E-8.2.1.3 in the 2020-2028 Base WMP. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. b. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028.	Nathan Poon	5/20/2025	6/5/2025	6/5/2025	https://www.pge.com/assets/ghg/docs/tables-and-figures/tables-prepares-and-support/2020-2028-SPO_012.pdf	1	No	5	Risk Methodology and Assessment	5.5.2
252	SPO	007	SPO_007	1	No	SPO_007_01	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 different in 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. This should include, for example, with a table that is similar to Table PG&E-8.2.1.2-2 in the 2020-2028 Base WMP. (Per page 182 of the 2020-2028 WMP SPO understands that the decision here will inform mitigation selection beginning in 2027.) b. Provide the total number of circuit segments where PG&E has already applied the decision tree for mitigation both in 2027 and 2028. c. Provide the total number of circuit segments where PG&E intends to apply the decision tree for work done in 2027 and 2028.	a. PG&E-8.2.1.1, PG&E-8.2.1.2, and PG&E-8.2.1.3 in the 2020-2028 Base WMP. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. b. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. c. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028.	Eddie Schmitt	6/22/2025	6/12/2025	6/12/2025	https://www.pge.com/assets/ghg/docs/tables-and-figures/tables-prepares-and-support/2020-2028-SPO_007.pdf	0	No	5	Risk Methodology & Assessment	5.4
253	O&S	PG&E's WPD model used as part of its WDOM or its variability or are the values presented in TABLE A-C1- PG&E-25U-01-1, uniformly applied to all assets?	SPO_007_02	2	No	SPO_007_02	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 different in 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. This should include, for example, with a table that is similar to Table PG&E-8.2.1.2-2 in the 2020-2028 Base WMP. (Per page 182 of the 2020-2028 WMP SPO understands that the decision here will inform mitigation selection beginning in 2027.) b. Provide the total number of circuit segments where PG&E has already applied the decision tree for mitigation both in 2027 and 2028. c. Provide the total number of circuit segments where PG&E intends to apply the decision tree for work done in 2027 and 2028.	a. PG&E-8.2.1.1, PG&E-8.2.1.2, and PG&E-8.2.1.3 in the 2020-2028 Base WMP. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. b. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. c. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028.	Eddie Schmitt	6/22/2025	6/5/2025	6/5/2025	https://www.pge.com/assets/ghg/docs/tables-and-figures/tables-prepares-and-support/2020-2028-SPO_007.pdf	0	Yes	5	Risk Methodology & Assessment	5.4
254	SPO	007	SPO_007	3	No	SPO_007_03	For lines where the wildlife risk is mitigated for undergrounding the primary lines, does PG&E have criteria for P&P or a separate line P&P or on how P&P is applied?	a. PG&E-8.2.1.1, PG&E-8.2.1.2, and PG&E-8.2.1.3 in the 2020-2028 Base WMP. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. b. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028.	Eddie Schmitt	6/22/2025	6/5/2025	6/5/2025	https://www.pge.com/assets/ghg/docs/tables-and-figures/tables-prepares-and-support/2020-2028-SPO_007.pdf	0	Yes	6	Wildlife Mitigation Strategy Development	6.13.1
255	SPO	007	SPO_007	4	No	SPO_007_04	SPD understood that PG&E was planning to change its replacement criteria for poles initially inspected to be primarily based off a calculated safety factor rather than the calculated remaining strength. SPD understood that one of the criteria for pole replacement was an intensive inspection would be if the remaining strength calculated was less than 25 percent. SPD understood the change would come in 2025, but the WMP only states that PG&E was evaluating a transition. Provide an update on the proposed change and currently adopted criteria for pole replacement or replacement based on the change.	a. PG&E-8.2.1.1, PG&E-8.2.1.2, and PG&E-8.2.1.3 in the 2020-2028 Base WMP. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. The values for CBR are calculated using the same methodology as the 2024 RAMP and WBCA Tool. b. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028. PG&E has already applied the decision tree for mitigation both in 2027 and 2028.	Eddie Schmitt	6/22/2025	6/5/2025	6/5/2025	https://www.pge.com/assets/ghg/docs/tables-and-figures/tables-prepares-and-support/2020-2028-SPO_007.pdf	0	Yes	8	Grid Design, Operations, and Maintenance	8.3.11

[illegible]

272	SPD	008	SPD_008	4	No	SPD_008_04	In a supplemental response to SPD-008-WMP2025-004 Question 4, PG&E stated that it has responded to the data request by "applying the ICE 2.0 disaggregated values (SPD-008 for residential, 323.11 CMM for commercial)". In its Compliance Plan for the 2027 GRC, PG&E stated PG&E continues to use by the 2027 GRC risk analysis using a system-wide, aggregated electric reliability value, developed based on the best judgment and extensive analysis at the time of GRC filing. a. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. b. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. c. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. d. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. e. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. f. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. g. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. h. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. i. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. j. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. k. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. l. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. m. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. n. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. o. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. p. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. q. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. r. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. s. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. t. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. u. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. v. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. w. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. x. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. y. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing. z. Explain why PG&E is not providing the disaggregated electric reliability values for the 2027 GRC filing.	Edwin Schmitt	6/20/2025	7/30/2025	7/30/2025	https://www.pge.com/en/eng/energy/energy-and-sustainability/progress-reports-and-reports/2025-008-SPD_008_04	0	No		
273	SPD	009	SPD_009	1	No	SPD_009_01	In PG&E's third supplemental response to Question 5 of SPD-008-WMP2025-004, PG&E stated the following with regard to the "Risk of" fields provided with the response: "Please note that, consistent with PG&E's prior responses, PG&E is providing only, rather than more, further, please note that the risk units associated with all arguments that are not provided in the requested list of circuit arguments, therefore that data is not included in the response." a. Explain why circuit arguments that include units of a mitigation provided in the 2025-2028 Base WMP are not included in the requested list of circuit arguments. b. Provide an updated version of WMP-008-WMP2025-008_DR_SPD_004-000559pg3A0001.docx in any subsequent version of this dataset that includes all of the circuit arguments requested in Question 1.	Edwin Schmitt	7/30/2025	7/19/2025	7/19/2025	https://www.pge.com/en/eng/energy/energy-and-sustainability/progress-reports-and-reports/2025-008-SPD_009_01	1	No		5.4
274	SPD	009	SPD_009	2	No	SPD_009_02	PG&E's third supplemental response to Question 5 of SPD-008-WMP2025-004 included the dataset labeled WMP-008-WMP2025-008_DR_SPD_004-000559pg3A0001.docx in the "History" spreadsheet under the WORM+4 portion of the dataset at the "Push-Mitigator" fields (Columns A-J). I have now been given the "See written response" values. a. Explain why PG&E has included an N/A for some circuit arguments. b. Explain why PG&E has included "See written response" for some circuit arguments. c. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". d. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". e. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". f. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". g. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". h. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". i. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". j. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". k. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". l. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". m. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". n. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". o. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". p. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". q. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". r. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". s. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". t. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". u. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". v. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". w. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". x. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". y. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response". z. Explain why PG&E is not providing responses to Question 5 of SPD-008-WMP2025-004 that do not inform SPD that it would fill these fields with N/A or "See written response".	Edwin Schmitt	7/30/2025	7/19/2025	7/19/2025	https://www.pge.com/en/eng/energy/energy-and-sustainability/progress-reports-and-reports/2025-008-SPD_009_02	2	No		5.4
275	SPD	009	SPD_009	3	No	SPD_009_03	In PG&E's third supplemental response to Question 5 of SPD-008-WMP2025-004, PG&E included a table of forecasted 2025-2028 costs for system hardening mitigations. PG&E also stated that comparing the reported expenditures and the reported miles will not yield an accurate cost because a project's cost may be spread across multiple years. a. Explain how PG&E estimated the forecasted 2025-2028 costs for the three system hardening mitigations. b. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs for the three system hardening mitigations. c. Provide the unit cost for each of the three system hardening mitigations and PG&E used to estimate the forecasted 2025-2028 costs. d. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. e. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. f. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. g. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. h. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. i. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. j. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. k. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. l. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. m. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. n. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. o. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. p. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. q. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. r. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. s. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. t. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. u. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. v. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. w. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. x. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. y. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs. z. Provide all expenditures PG&E used to estimate the forecasted 2025-2028 costs.	Edwin Schmitt	7/30/2025	7/19/2025	7/19/2025	https://www.pge.com/en/eng/energy/energy-and-sustainability/progress-reports-and-reports/2025-008-SPD_009_03	3	No	5	5.2
276	SPD	009	SPD_009	4	No	SPD_009_04	In response to Question 23 of SPD-008-WMP2025-004, PG&E stated that the Decision Trees in Figures 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 are in fact one single decision tree connected together and that there are five results from the decision tree. PG&E stated that the decision tree is: (1) implement a 100% overhead hardening solution (2) implement a 100% undergrounding solution (3) implement a 100% undergrounding solution (4) implement a hybrid hardening solution where portions of a line are undergrounded and other portions are overhead hardening (5) implement a line removal with remote grid solution a. Provide an example circuit segment from each of the five results. For each of the five circuit segments, provide a step-by-step explanation of each decision that PG&E needed to make and each analysis PG&E needed to conduct in order to arrive at the final result for each circuit segment. b. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. c. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. d. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. e. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. f. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. g. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. h. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. i. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. j. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. k. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. l. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. m. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. n. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. o. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. p. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. q. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. r. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. s. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. t. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. u. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. v. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. w. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. x. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. y. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP. z. Explain why the analysis for each circuit segment is not provided in the 2025-2028 Base WMP.	Edwin Schmitt	7/30/2025	7/19/2025	7/19/2025	https://www.pge.com/en/eng/energy/energy-and-sustainability/progress-reports-and-reports/2025-008-SPD_009_04	0	No	5	5.2.2

