

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023
Data Response**

PG&E Data Request No.:	OEIS_008-Q002		
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Request Date:	May 25, 2023	Requester DR No.:	P-WMP_2023-PG&E-008
Date Sent:	May 31, 2023	Requesting Party:	Office of Energy Infrastructure Safety
DRU Index #:		Requester:	Dakota Smith

Regarding Undergrounding Workplan Targets

QUESTION 002

- a. Explain why PG&E has reduced undergrounding targets provided within its workplan when comparing PG&E’s 2022 WMP to the 2023-2025 WMP.
- b. Provide two versions of an updated Table PG&E-8.1.2-3 from PG&E’s 2023-2025 WMP in which the Top 20% is based on risk model output scores from V2 and V3 respectively, opposed to WFE. Both mileage and % of Portfolio columns should be updated for each respective year and total.

ANSWER 002

- a. In the 2022 WMP, PG&E introduced its plan to underground 10,000 distribution circuit miles in and near high wildfire risk areas which included an initial goal of undergrounding 3,400 miles from 2023-2026. PG&E submitted a workplan that included 3,716 miles for that time period. (2022 WMP Table RN-PG&E-22-03-02).

In the 2023-2025 WMP, PG&E has reiterated its commitment to underground 10,000 circuit miles in and near high wildfire risk areas. In the 2023-2025 WMP, PG&E has targeted undergrounding 2,100 miles from 2023-2026. The plan it submitted contains 2,687 miles to ensure it can meet its targets. (2023-2025 WMP, Table PG&E-8.1.2-3).

Along with the 2022 WMP and 2023 WMP, PG&E also presented its 10,000 mile undergrounding plan in its Test Year 2023 General Rate Case (TY 2023 GRC, A. 21-06-021). Similar to the update from our 2022 WMP to our 2023 WMP, PG&E reduced its forecast mileage (and cost) targets for 2023-2026 in its TY2023 GRC (A. 21-06-021, PG&E’s Reply Brief, Table 4-8 and Table 4-9). The mileage targets in PG&E’s Reply Brief are aligned to the mileage targets in its 2023-2025 WMP.

PG&E recognizes, and has stated from the beginning, that its 10,000 mile undergrounding plan will evolve in light of: (1) the ongoing work and learnings from our project management team, engineers, operators, construction workers, and other experts; (2) input from external stakeholders; (3) the undergrounding plan reviews pursuant to Senate Bill (SB) 884; (4) the permitting process under state, county, and local laws; and (5) other factors such as economic and market conditions, and supply chain dynamics.

Commissioner John Reynolds, in his opening remarks at the start of PG&E's TY2023 GRC evidentiary hearings, highlighted, in particular, the timing challenges presented in connection with PG&E's forecasting in the GRC while at the same time submitting annual wildfire mitigation plans for review by the Office of Energy Infrastructure Safety (Energy Safety). Commissioner Reynolds noted that in light of this timing, it is reasonable to expect PG&E's plans to evolve and to allow for potential changes in the GRC:

The Wildfire Mitigation Plan process remains relatively new and we expect PG&E, like other utilities, to continue adjusting its approaches to wildfire mitigation in light of developments and learning in the WMP process. (A. 21-06-021, PG&E's Reply Brief, pp. 326-327).

Intervenors in our TY2023 GRC questioned several aspects of initial PG&E's undergrounding proposal, including the reasonableness of the proposed scope, pace, and costs. In response to the developing regulatory environment and intervenors' concerns, as well as considering the execution challenges of ramping up the program and the potential benefits to ramping up more slowly, PG&E decided to reduce our program costs and corresponding mileage targets for 2023-2026, while PG&E remains committed to our long-term risk mitigation goals in connection with our 10,000 mile undergrounding plan.

- b. PG&E first notes that Table 8.1.2-3 does not include a feasibility component (WFE). The table was provided in the WMP to demonstrate how much of the 2023-26 undergrounding workplan is located within the top 20% mean risk-ranked circuit segments for added transparency.

With this clarification, please see attachment "*WMP-Discovery2023_DR_OEIS_008-Q002Atch01CONF.xlsx*". In this attachment, PG&E provides two versions of an updated Table PG&E-8.1.2-3 from PG&E's 2023-2025 WMP which show the mileage and percent contribution from v2 and v3 for each year without feasibility (WFE) included. PG&E also included a third table that captures the Butte Community Rebuild projects, which were not selected based on either the v2 or v3 WDRM risk model. This last table with the Butte Rebuild miles was included in this response to demonstrate the associated miles that add up to the totals reflected in the original table 8.1.2-3.

Please note that in the original Table 8.1.2-3 PG&E noted that top risk rank percentages for 2023 were based on V2 and 2024-2026 based on V3 for simplicity because the majority of the mileage for those years were based on those respective model versions. However, as indicated in the new tables provided in response to this request, a small amount of mileage selected using WDRM V3 is planned for undergrounding in 2023 and a small amount of mileage selected using WDRM V2 is planned for undergrounding after 2023. The total mileage in Table 8.1.2-3 in the top 20% of mean risk-ranked circuit segments combines the mileage selected using WDRM V2 and V3.