



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

715 P Street, 20th Floor | Sacramento, CA 95814
916 902-6000 | www.energysafety.ca.gov

Caroline Thomas Jacobs, Director

TRANSMITTED VIA ELECTRONIC MAIL

DATA REQUEST

Request Date: December 11, 2024

Response Due: December 16, 2024

To: Dan Blair
D7BD@pge.com
Regulatory Relations Advocacy Manager
Pacific Gas and Electric (PG&E)
300 Lakeside Drive, Oakland, CA 94612

Wade Greenacre
WAG9@pge.com
Regulatory Relations Advocacy Director
Pacific Gas and Electric (PG&E)
300 Lakeside Drive, Oakland, CA 94612

Originator: Kristin Ralff Douglas
Kristin.RalffDouglas@energysafety.ca.gov

Data Request Number: Energy Safety-DR-EUP-24-09

Subject: Circuit Segments and Spans Traversing HFTD and non-HFTD Boundaries



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INSTRUCTIONS

- a. Provide all information in your possession, custody, or control, or the possession, custody, and/or control of your affiliates or agents, that is responsive to these data requests by the due date identified above.
- b. Responses and documents may be produced and served electronically, but they shall be fully machine-readable and searchable.
- c. If you have any questions about the meaning or scope of the data requests herein, direct such questions to the Energy Safety staff identified as the “Originator” of this request at your earliest opportunity.
 1. Lack of clarity on meaning or scope of requests, without prior request for clarification from the “Originator,” will not be a permissible reason for incomplete responses and will be regarded as non-compliance with the request.
- d. Identify the personnel (employees, consultants, agents, etc.) who provided information responsive to each of the data requests below. As used in this context herein, “identify” means to provide the full name, business address, and title of each employee, consultant, or agent who provided such information.
- e. If you do not know the exact answer to any of the requests below, please so indicate and provide your best estimate.
- f. Provide data in its original format (i.e., PDF, Excel, GIS shapefile, etc.), unless otherwise specified in the request.
- g. Send your response to Kristin Ralff Douglas (Kristin.RalffDouglas@energysafety.ca.gov), and include a copy to:

Simone.Brant@energysafety.ca.gov,
Jeanne.Mckinney@energysafety.ca.gov,
electricalundergroundingplans@energysafety.ca.gov
- h. E-file a copy of the response on the Electrical Undergrounding Docket #2023-UPs.



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REQUEST

Q01. Under PG&E’s current system hardening program, is there a difference in how projects are scoped in High Fire Threat Districts (HFTD) and High Fire Risk Areas (HFRA)? How does PG&E scope circuit segments that traverse HFTD, HFRA and/or non-HFTD/HFRA boundaries? Please provide examples of the types of locations where this situation arises.

Q02. What is the approximate total linear miles of overhead primary distribution circuit segments that traverse HFTD and non-HFTD boundaries?

- a. What is the maximum number of primary distribution circuit segments that traverse HFTD and non-HFTD boundaries?
- b. Of the circuit segments that traverse HFTD and non-HFTD boundaries, approximately how many miles are inside a HFTD? Approximately how many miles are outside a HFTD?

Q03. What is the approximate total linear miles of overhead primary distribution spans that traverse HFTD and non-HFTD boundaries?

- a. What is the maximum number of primary distribution spans that traverse HFTD and non-HFTD boundaries?
- b. Of the spans that traverse HFTD and non-HFTD boundaries, approximately how many miles are inside a HFTD? Approximately how many miles are outside a HFTD?
- c. What is the average length of a span?

Q04. If the entire circuit segment was considered to be within a HFTD if any portion of the circuit segment was in a HFTD:

- a. What are the approximate linear miles of overhead primary distribution lines that traverse HFTD and non-HFTD boundaries that PG&E expects to underground through the EUP?
- b. What is the approximate number of primary distribution circuit segments that traverse HFTD and non-HFTD boundaries that PG&E would expect to underground through the EUP?

Q05. If the entire span was considered to be within a HFTD if any portion of the span was in a HFTD:



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- a. What are the approximate linear miles of overhead primary distribution lines that traverse HFTD and non-HFTD boundaries that PG&E expects to underground through the EUP?
- b. What is the approximate number of primary distribution circuit segments that traverse HFTD and non-HFTD boundaries that PG&E would expect to underground through the EUP?

Q06. If only the portion of a circuit segment within a HFTD were to be considered eligible through the EUP:

- a. What mitigation options would PG&E consider regarding circuit segments traversing HFTD and non-HFTD boundaries?
- b. If PG&E were to scope system hardening work on the circuit segments traversing HFTD and non-HFTD boundaries, how would PG&E pursue funding for the portions of the circuit segment that are ineligible for the EUP? How would pursuing funding through a different program affect the timing and cost of the projects on both the eligible and the ineligible portions of that circuit segment?

END OF REQUEST