PACIFIC GAS AND ELECTRIC COMPANY
PG&E Ref. DRU14847-Case-EUP-SB 884
Data Request OEIS
Requester DR No. Energy Safety DR-EUP-24-09_Supplement
(Follow-Up to Energy Safety-DR-EUP-24-09)

Requester: Brant, Simone
Request Date: December 18, 2024
Response Date: December 20, 2024

Background:

Follow up questions to data request DR-EUP-24-09.

Question No. 001:

	Count	Miles In HFTD/HFRA	Miles In non-HFTD/HFRA	Total Miles that Traverse Boundary	Total Miles that Traverse Boundary from Previous Communication
CS completely in HFTD/HFRA	1,324	12,981	0	0	-
Circuit Segments Traversing Boundary	2,449	12,728	8,446	21,174	-
CS to be UG through EUP if entire CS is considered eligible	249	-	-	877	-
Spans Traversing Boundary	15,251	289	289	578	140
Spans Expected to be UG through EUP if entire span is considered eligible	249 (number of CS)	28	28	57	20

Is this table accurate?

Response to Question No. 001 Response No. 001:

Yes, the table above prepared by Energy Safety is accurate based on the number of crossings from HFTDs and HFRAs into non-HFTD/HFRA areas as depicted in Figure 2 of PG&E's response to Question 1 of Energy Safety-DR-EUP-24-09.

Table 1 below is an updated table prepared by PG&E that is based on crossings from HFTD Tier 2 and 3 only (excluding HFRA), as depicted in Figure 1 of PGE's response to Question 1 of Energy Safety-DR-EUP-24-09.

Table 1: HFTD and non-HFTD Crossing Analysis

New HFTD Tier 2/3 Only	Count	Miles In HFTD	Miles In Non-HFTD	Total Miles for segments Traversing Boundary	Total Miles that Traverse Boundary from Previous Communication (referenced in Q003)
CS completely in HFTD	1,291	12,517	-	-	-
Circuit Segments Traversing Boundary	2,359	12,577	8,036	20,612	-
CS to be UG through EUP if entire CS is considered eligible	327	-	-	540	-
Spans Traversing Boundary	15,331	290	290	581	140
Spans Expected to be UG through EUP if entire span is considered eligible	327 (number of cs)	40	40	80	20

Furthermore, PG&E is not recommending that the EUP allow a Large Electrical Corporation to include all of the mileage on the circuit segment outside the HFTD, but only to include the remaining portion of the span outside the HFTD map layer.

Question No. 002:

Do PG&E's responses to questions 2-6 only take into consideration lines traversing Tier 2 or 3 HFTD to non-Tier 2 or 3 HFTD areas or do the responses also include lines traversing HFRA to non-Tier 2 or 3 HFTD areas? If they include HFRA to non-Tier 2 or 3 HFTD, please submit updated numbers with only those crossing Tier 2 or 3 HFTD to non-Tier 2 or 3 HFTD boundaries.

Response to Question No. 002 Response No. 001:

PG&E's initial response include crossings between HFRA to non-HFTD. See Table 1 above for an updated table based solely on crossings between HFTD Tier 2/3 and non-HFTD.

Question No. 003:

Did the previously communicated estimated 20 miles of undergrounding that traversed a Tier 2 or 3 HFTD boundary include only the portion of the span outside Tier 2 or 3 HFTD areas or the total mileage of those traversing spans (Inside Tier 2 or 3 HFTD plus outside Tier 2 or 3 HFTD)?

Response to Question No. 003 Response No. 001:

The previously communicated 20 miles was based on the portion of the span that crosses the HFTD/HFRA boundary. This estimate assumed that every HFRA/HFTD circuit segment (3,773) had one crossing and a span length of 200 feet, resulting in approximately 140 miles. To reduce this number to circuits likely to be included in the EUP, it was assumed that the top 500 circuit segments may be included, which would require dividing this estimate by 7[1], yielding a total of 20 miles. Consideration

[1] 3,773 circuit segments / top 500 circuit segments = ~ 7

was not given as to what proportion of those miles were in non-HFTD or HFTD, so that estimate includes both portions of the span.

Those preliminary assumptions were based on subject matter expert input, and PG&E updated this estimate with a GIS study and further assumptions outlined in the response to questions 2-5 of data request Energy Safety-DR-EUP-24-09.

Question No. 004:

PG&E's response included a high-end estimate for the number of spans that might be undergrounded through the EUP. Are the span miles in a non-HFTD/HFRA (28 miles) also a high-end estimate?

Response to Question No. 004 Response No. 001:

Yes. The estimated number of spans that would be undergrounded included in PG&E's original response to DR-EUP-24-09 Question 5 likely represents a high-end estimate. The actual number of spans that traverse the HFTD and non-HFTD boundaries and that would be undergrounded would likely be lower because we would expect to include a mix of undergrounding and overhead hardening.

It is important to note that the estimates are based on the maximum span crossings provided in PG&E's original response to DR-EUP-24-09 Question 3a. The method of deriving the estimated span miles provided in response to question 5 is based on a number of averages and assumptions:

- An average count of spans per circuit segment (6.5 spans per circuit segment)
- An average length of a span (200ft) (actual lengths are not available)
- Assuming half of the 200 ft. span is outside the HFTD map layer, thus a 50% split between HFTD/HFRA (28 miles) and non-HFTD/HFRA (28 miles)

Question No. 005:

Is there an estimate of the miles to be undergrounding in a Tier 2 or 3 HFTD and in a non-Tier 2 or 3 HFTD through the EUP if the entire circuit segment is considered eligible? If so, please submit updated numbers.

Response to Question No. 005 Response No. 001:

If the top 1,000 wildfire risk ranked segments were considered for full undergrounding scope through the EUP, approximately 9,112 miles of existing Tier 2/3 HFTD overhead lines would be targeted as well as 738 miles of non HFTD.

PG&E is not recommending that the EUP allow a Large Electrical Corporation to include the entire mileage on the circuit segment outside the HFTD, but only to include the remaining portion of the span outside the HFTD map layer.

Question No. 006:

What are the approximate linear miles of the 751 top ranked wildfire risk overhead primary distribution circuit segments that would be targeted that do not traverse Tier 2 or 3 HFTD to non-Tier 2 or 3 HFTD boundaries?

Response to Question No. 006 Response No. 001:

Of the 751 top ranked wildfire risk segments, 500 segments are exclusively Tier 2 or Tier 3 HFTD and do not traverse the HFTD/non-HFTD boundary. These 500 segments consist of 4,994 primary overhead miles.