

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigations Plans Discovery 2026-2028
Data Response

PG&E Data Request No.:	OEIS_004-Q004
PG&E File Name:	WMP-Discovery2026-2028_DR_OEIS_004-Q004
Request Date:	April 18, 2025
Requester DR No.:	OEIS-P-WMP-2025-PG&E-004
Requesting Party:	Office of Energy Infrastructure Safety
Requester:	Nathan Poon
Date Sent:	April 29, 2025

SUBJECT: REGARDING TABLE 6-4: SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS

QUESTION 004

In response to Energy Safety's Data Request 2, Question 17, PG&E provided an updated version of Table 6-4 including the associated mileage for various hardening planned and percentage that has already been hardened.

- a. Compared to the targets provided in Table 8-1 (PG&E's 2026-2028 Base WMP, p.175) and estimates in PG&E's response to Energy Safety's Data Request 1 Question 17 (labeled "WMP" in the table), to the summation of the mileages provided in Attachment 1 (labeled "DR" in the table), Energy Safety found the following:

Provide the following mileages associated for each hardening mitigation type missing from the mileages provided in the updated Table 6-4 (labeled "Δ" in the table):

	2026			2027			2028		
Hardening Type	WMP	DR	Δ	WMP	DR	Δ	WMP	DR	Δ
Undergrounding	370	16.94	353	307	203.68	103	400	278.10	122
Covered Conductor	294	78.23	216	190	91.23	99	190	115.70	74
Line Removal	24	3.04	21	10	4.5	5.5	10	8.70	1.3

- i. Work prescribed in lower 80% of risk due to prioritization based on WDRM v3
- ii. Work prescribed in lower 80% of risk due to other qualifying threshold, broken out by threshold (i.e., ingress/egress issue, tree strike potential, PSPS risk)
- iii. Work not yet planned for specific circuit segments
- iv. Other not listed above, including associated reasoning
- b. Provide the following risk score values, similar to those provided within Table 6-4 for the top 20% riskiest circuit segments:
- i. The total initial overall utility risk for PG&E's service territory
- ii. The total overall utility risk for each year (2026-2028) for PG&E's service territory including EPSS

- iii. The total overall utility risk for each year (2026-2028) for PG&E's service territory excluding EPSS
- c. The following circuit segments listed within Table 6-4 do not have any type of hardening planned from 2026 to 2028 and have undergone either no hardening or minimal hardening (less than one percent). For each circuit, explain why no hardening is planned currently, and whether hardening is planned past 2028:
 - 1) MIDDLETOWN 1101644756
 - 2) CALPINE 1144CB
 - 3) MARIPOSA 210237282
 - 4) BIG BEND 1101CB
 - 5) CALAVERAS CEMENT 1101502
 - 6) CORNING 110185152
 - 7) CURTIS 17048140
 - 8) COLUMBIA HILL 1101CB
 - 9) TEMPLETON 2113A12
 - 10) PINE GROVE 11026080
 - 11) MARTELL 110191216
 - 12) MOLINO 1102318 1
 - 13) HIGHLANDS 1103520
 - 14) COARSEGOLD 210410110
 - 15) MARIPOSA 210237288
 - 16) FROGTOWN 170113412
 - 17) CORNING 11021622
 - 18) DIAMOND SPRINGS 110676088
 - 19) BRUNSWICK 11021010
 - 20) APPLE HILL 110413512
 - 21) DIAMOND SPRINGS 11057722
 - 22) APPLE HILL 2102836878
 - 23) APPLE HILL 21028372
 - 24) LOS OSITOS 21037014
 - 25) MARIPOSA 2101439030
 - 26) HOPLAND 11014626
 - 27) PINE GROVE 1102269286
 - 28) ORO FINO 110239154
 - 29) WEST POINT 110234416
 - 30) CEDAR CREEK 1101CB

- 31) SISQUOC 1102M52
- 32) TEMPLETON 2113641367
- 33) FORESTHILL 1102359542
- 34) BRUNSWICK 110651486
- 35) SHINGLE SPRINGS 210913322
- 36) PINE GROVE 11013170
- 37) APPLE HILL 21021532
- 38) WILDWOOD 1101384582
- 39) PERRY 110179696

ANSWER 004

- a. Please see attachment “WMP-Discovery2026-2028_DR_OEIS_004-Q004Atch01.xlsx” for missing from the mileages provided in the updated Table 6-4 (labeled “Δ” in the table). A few notes about this data:
- In answering this question, we identified a calculation error in our response to OEIS_002_Question 17 regarding the miles pulled in for each circuit segment. That response under counted the miles planned on circuit segments in Table 6-4 based on the formula that was used to pull in the data (i.e., the miles originally included only captured the miles for one subproject associated with the circuit segment, not all subprojects planned on that circuit segment). We have corrected the miles in the table and provided as a supplemental response to this data request as attachment “CORRECTED_WMP-Discovery2026-2028_DR_OEIS_002-Q017Atch01.xlsx”.
 - The 2027-2028 portfolio is currently planned at the circuit segment-level based on the top 20% **risk ranked** circuit segments of the WDRM v4 model. The work is not yet scoped and broken into subprojects. Columns ii-iv cannot be filled out.
 - i. The values in Table 6-4 were generated using WDRM v4. We assume the intent of this subpart was to provide work prescribed in lower 80% of total overall utility risk due to prioritization based on WDRM v4, not v3, and have responded accordingly. PG&E welcomes clarification if there was different intent about scope of this request.
 - ii. Work in this category represents projects that are Fire Rebuild, PSPS, or “Other”, which includes projects that were initiated under other programs outside of the System Hardening program which is funded by MAT codes 08W and 3UG, such as Work Requested by Others (WRO), capacity, and Rule 20 B and C programs.
 - iv. Work in this category represents Community Rebuild miles. This work occurs in HFTD and non-HFTD areas following fire incidents.
- b. Table 6-4 of the WMP includes the top 20% of total overall utility risk for circuit segments within the HFTD/HFRA. These tables are generated from WDRM v4. The responses included in subparts i-iii are for the entire service territory. Additionally, subparts i and ii will be included in the same attachment as Overall Utility Risk is

comprised of Wildfire Risk + EPSS and PSPS risk. As described in subpart (a) above, the portfolio was selected based on the top 20% wildfire risk ranked circuit segments, not accounting for the outage program risk as included in Overall Utility Risk.

- i. Please see attachment “WMP-Discovery2026-2028_DR_OEIS_004-Q004Aatch02.xlsx” for total overall utility risk by year.
 - ii. Please see attachment “WMP-Discovery2026-2028_DR_OEIS_004-Q004Aatch02.xlsx” for total overall utility risk by year.
 - iii. Please see attachment “WMP-Discovery2026-2028_DR_OEIS_004-Q004Aatch03.xlsx” for total overall utility risk by year, excluding EPSS risk.
- c. Projects in previous year’s workplans, including up to 2026, were prioritized by earlier wildfire distribution risk models and drivers (e.g., WDRM V2 or V3, PSPS lookback, etc.) and were not targeted based on WDRM V4 or total Overall Utility Risk. For work in 2027 and 2028, the primary driver for targeting circuit protection zones (CPZs) for a hardening mitigation is based on the WDRM v4 risk ranked circuit segments based on density of risk per mile (not total risk on the circuit segment).

There are various reasons why these CPZs are not in our current hardening workplans, including the below reason codes:

- A. They are Privately Owned Lines (POL). PG&E does not harden privately owned lines.
- B. High total overall utility risk. The program does not select and prioritize CPZs for system hardening work based on total risk or overall utility risk.
- C. Work was completed or planned under a previous model’s CPZ name.

Our workplan will continue to evolve as we scope work and validate more granular data associated with the CPZs, such as Privately Owned Lines. For example, we recently initiated scoping on MIDDLETOWN 1101644756 and BIG BEND 1101CB, which were originally identified as Privately Owned Lines, but through the scoping process we validated these are not Privately Owned Lines. These two CPZs are tagged with an asterisk (*).

Reason Not Included	Circuit Protection Zone (CPZ)
A – Privately Owned Lines*	BIG BEND 1101CB
A – Privately Owned Lines	CALPINE 1144CB
A – Privately Owned Lines*	MIDDLETOWN 1101644756
A – Privately Owned Lines	WILDWOOD 1101384582
B – Overall Utility Risk Not Part of Selection Criteria	CALAVERAS CEMENT 1101502
B – Overall Utility Risk Not Part of Selection Criteria	CORNING 110185152
B – Overall Utility Risk Not Part of Selection Criteria	CORNING 11021622
B – Overall Utility Risk Not Part of Selection Criteria	CURTIS 17048140
B – Overall Utility Risk Not Part of Selection Criteria	DIAMOND SPRINGS 110676088

Reason Not Included	Circuit Protection Zone (CPZ)
B – Overall Utility Risk Not Part of Selection Criteria	HIGHLANDS 1103520
B – Overall Utility Risk Not Part of Selection Criteria	HOPLAND 11014626
B – Overall Utility Risk Not Part of Selection Criteria	MARIPOSA 2101439030
B – Overall Utility Risk Not Part of Selection Criteria	MARIPOSA 210237282
B – Overall Utility Risk Not Part of Selection Criteria	MOLINO 1102318
B – Overall Utility Risk Not Part of Selection Criteria	PERRY 110179696
B – Overall Utility Risk Not Part of Selection Criteria	PINE GROVE 1102269286
B – Overall Utility Risk Not Part of Selection Criteria	SHINGLE SPRINGS 210913322
B – Overall Utility Risk Not Part of Selection Criteria	WEST POINT 110234416
B – Overall Utility Risk Not Part of Selection Criteria	APPLE HILL 110413512
B – Overall Utility Risk Not Part of Selection Criteria	APPLE HILL 21021532
B – Overall Utility Risk Not Part of Selection Criteria	APPLE HILL 2102836878
B – Overall Utility Risk Not Part of Selection Criteria	APPLE HILL 21028372
B – Overall Utility Risk Not Part of Selection Criteria	BRUNSWICK 11021010
B – Overall Utility Risk Not Part of Selection Criteria	BRUNSWICK 110651486
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B – Overall Utility Risk Not Part of Selection Criteria	COARSEGOLD 210410110
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B – Overall Utility Risk Not Part of Selection Criteria	PINE GROVE 11013170
B – Overall Utility Risk Not Part of Selection Criteria	PINE GROVE 11026080
B – Overall Utility Risk Not Part of Selection Criteria	SISQUOC 1102M52
B – Overall Utility Risk Not Part of Selection Criteria	TEMPLETON 2113641367
B – Overall Utility Risk Not Part of Selection Criteria	TEMPLETON 2113A12
C – Work Planned under Different CPZ	FORESTHILL 1102359542