

**PACIFIC GAS AND ELECTRIC COMPANY**  
**PG&E Ref. DRU13901-Misc.-OEIS**  
**Data Request OEIS**  
**Requester Event Ref. No.**  
**Requester DR No. Energy Safety-DR-EUP-24-03**

**Requester: Ralff Douglas, Kristin**  
**Request Date: June 28, 2024**  
**Response Date: July 08, 2024**

**Question No. 001:**

How does PG&E define “service lines”? Is this different from how PG&E defines “service drops”?

**Response to Question No. 001 Response No. 001:**

PG&E follows Electric Rule 2 requirements as it relates to providing electric service to our customers. In the context of the Electric Undergrounding Plan (EUP), service lines are low voltage lines (up to 600V) established at one delivery point to one meter and one voltage class. A service line can be served directly from the distribution transformer or fed from a secondary line (also low voltage) that serves multiple customers.

A service drop is the last span from the pole to the customer’s weather-head and panel.

It should be noted that there are primary service lines in the system, but we stop our mitigations at the “Point of Service” where ownership and maintenance of the service and metering system is transferred to the primary customer.

**Question No. 002:**

How does PG&E define “secondary distribution lines”?

**Response to Question No. 002 Response No. 001:**

Secondary distribution lines are low voltage lines that distribute power from our distribution transformers to multiple customers. Secondary lines in the context of the EUP do not tie to meters directly, but the secondary line transitions to a service line once it taps off (i.e., splits off) to serve a single meter.

**Question No. 003:**

How does PG&E account for service lines in their current Wildfire modeling?

**Response to Question No. 003 Response No. 001:**

Service lines are included in the secondary overhead conductor model. Service lines are modeled together with secondary overhead conductors because historical outage and ignition records do not distinguish between whether the event occurred on a secondary conductor or service line. Additionally, PG&E's wildfire mitigation programs do not separate service line risk from the secondary conductor risk.

**Question No. 004:**

How does PG&E account for service lines in their current undergrounding planning and modeling?

**Response to Question No. 004 Response No. 001:**

For modeling information, please see our response to Question 3. Because we consider secondary and service lines as the same voltage class system, for planning purposes we consider secondary and service lines the same.

In our undergrounding program, PG&E currently places underground both the overhead distribution primary lines and those secondary and service lines that run parallel to the undergrounded primary lines because the parallel secondary and service lines can be placed in the same trench as the primary lines being undergrounded. PG&E will continue to evaluate when and/or how we underground secondaries and service lines in future years in response to feedback from Energy Safety, other stakeholders, and benchmarking with other utilities.

**Question No. 005:**

Why does PG&E want to combine these line asset classifications?

**Response to Question No. 005 Response No. 001:**

PG&E considers secondary and service lines as part of the same voltage class and the same system when reviewing wildfire mitigations in the area. Therefore, we combine these line asset classifications.

**Question No. 006:**

From PG&E's perspective, what are the potential benefits and drawbacks from combining these classifications?

**Response to Question No. 006 Response No. 001:**

The most consistent way to manage our mitigation decisions and construction is to consider secondary and service lines as the same low voltage system. We do not see a specific benefit for separating secondary and service line classifications when the only difference is that secondary lines serve multiple customers and service lines serve only one.