

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

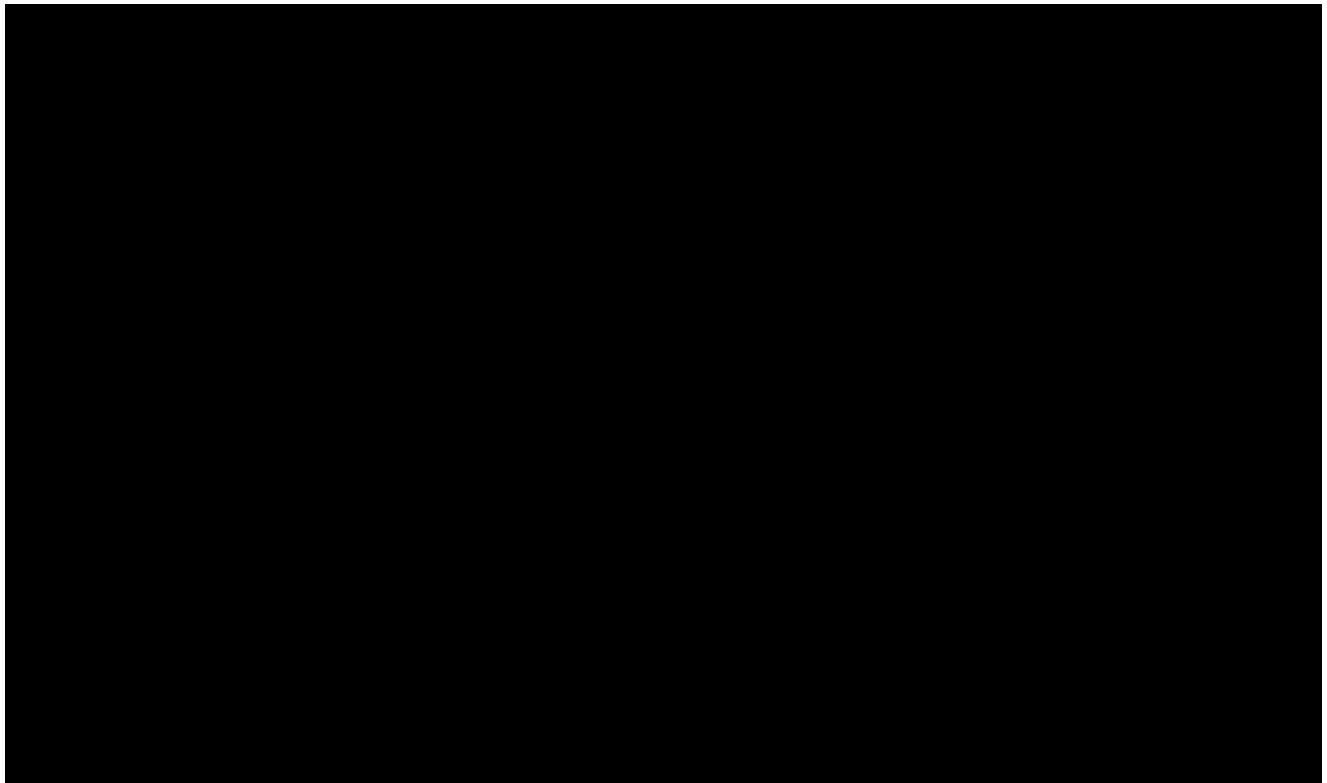
PG&E Data Request No.:	CalAdvocates_017-Q001_Redacted		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_017-Q001_Redacted		
Request Date:	April 21, 2023	Requester DR No.:	CalAdvocates-PGE-2023WMP-17
Date Sent:	April 28, 2023	Requesting Party:	Public Advocates Office
DRU Index #:		Requester:	Matthew Taul

The following questions relate to your 2023-2025 WMP submission, Confidential response to Question 8 on "PGE-2023WMP-06_VM_inspection_SH_questions", Confidential response to Question 16 on "PGE-2023WMP-09_VM_WTRM_UG_vs_CC_costs_and_RSE", and Confidential response to Question 1 on "WMP-Discovery2022_DR_CalAdvocates_035".

QUESTION 001_REDACTED

Question 001 was deemed confidential by the California Public Advocates Office.

<< begin confidential >>



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- 1 Public response to Question 1 on "WMP-Discovery2022_DR_CalAdvocates_031."
 - 2 Cross referenced against Confidential response to Question 1 on "WMP-Discovery2022_DR_CalAdvocates_035".

<< end confidential>>

ANSWER 001_REDACTED

- a) Upon review, PG&E respectfully finds that the CPZ mileages presented in Table 1 are incorrect. As a result of the mileage errors in the Table, the Calculated Risk/Mile

figures are incorrect as well. We also note that we do not use the term “cumulative risk.” We use the term “composite risk” and interpret this question as involving “composite risk” scores. Any difference between these two terms is not material to our response.

The attachment used to develop the quoted miles from this analysis, WMP-Discovery2022_DR_CalAdvocates_035, does not represent the total OH miles contained within each circuit segment, but the total projected UG miles from the “project.” These “projects” can include multiple circuit segments and represent the UG miles planned to be installed, not the OH miles removed used to calculate the risk value. Each of these segments were bundled with other high-risk segments and brought forward to be worked concurrently. The bundling of neighboring circuit segments supports cost effectiveness and will provide a larger benefit in terms of reduced PSPS and EPSS impacts as well. Therefore, the analysis performed here in terms of risk points for a single circuit segment divided by the undergrounding miles for a bundled project (which includes multiple circuit segments) is not comparing a consistent numerator and denominator.

The 2,100 miles in the beginning stages of our undergrounding program is primarily comprised of 2021 WDRM V2 scoped miles, Fire Rebuild miles, PSPS miles, and PSS recommended miles, and only more recently included miles selected based off of the 2022 WDRM V3. We did not cancel previously scoped and in process work due to the release of V3. For the available miles to be scoped leveraging V3, we utilized a selection strategy to include underground difficulty and cost efficiency measures such as bundling to facilitate improved unit costs, execution timelines, and a balance of work.

The following is a list of more specific reasons why each circuit segment referenced in this question was not included in the 2,100 mile workplan referenced:

- Circuit segments: Oakhurst 110310140, Bear Valley 2105CB, Keswick 11019712, Peoria 170190090, Columbia Hill 1101CB, and Apple Hill 21029722 had a lower Wildfire Feasibility Effectiveness (WFE) score due to expected high undergrounding difficulty and, after bundling with nearby segments, there are other locations with higher WFE scores to prioritize in the earlier years.
 - In addition, Apple Hill 21029722 was not included due to concerns with area over-saturation, i.e., there were >100 miles already planned in our first tranche on this same circuit.
 - El Dorado PH 210119752 is already hardened with some undergrounding along Sly Park Rd. The fact that a portion of the circuit is already undergrounded was not considered by the WDRM V3 risk model as a result of GIS snapshot timing, but upon engineering review of the circuit based on its current configuration, no additional work is recommended at this time.
- b) El Dorado PH 210119752 was identified in the earlier parts of the System Hardening program and completed in 2022. The scope for that project was developed in prior years and the project was in construction prior to the creation of the Underground 10K program in late 2021.

- c) Portions of Peoria 170190090 were identified as potential remote grid candidates and the work on that circuit is being advanced separately from the future planned underground work. In that context, Remote Grid work is classified as “BASE SH”.
- d) Circuit segment Oakhurst 110310140 had a lower WFE score due to expected high undergrounding difficulty and, after bundling with nearby segments, there are other locations with higher WFE scores to prioritize in the earlier years. Note that the “Fire Rebuild” criteria is only for areas impacted directly by wildfires and while this circuit is near where fires have occurred in recent years, no fires had significantly impacted this circuit segment since the beginning of the System Hardening program.
- e) Circuit segment Bear Valley 2105CB had a lower WFE score due to expected high undergrounding difficulty and, after bundling with nearby segments, did not fall in the highest priority miles to target at this time. Note that the “Fire Rebuild” criteria is only for areas impacted directly by wildfires and no fires have significantly impacted this circuit segment since the beginning of the System Hardening program.
- f) Circuit segment Keswick 11099712 had a lower WFE score due to expected high undergrounding difficulty and, after bundling with nearby segments, did not fall in the highest priority miles to target at this time. Note that the “Fire Rebuild” criteria is only for areas impacted directly by wildfires and no fires have significantly impacted this circuit segment since the beginning of the System Hardening program.