

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

PG&E Data Request No.:	TURN_005-Q004		
PG&E File Name:	WMP-Discovery2023_DR_TURN_005-Q004		
Request Date:	April 14, 2023	Requester DR No.:	TURN-PG&E- 5
Date Sent:	April 19, 2023	Requesting Party:	The Utility Reform Network
DRU Index #:		Requester:	Tom Long

**SUBJECT: SYSTEM HARDENING**

**QUESTION 004**

For the undergrounding work described in PG&E's 2023-2025 WMP, please describe PG&E's policy concerning undergrounding of service connections and the removal of poles on which service connections are attached. To the extent that this determination varies by project, please describe the criteria that PG&E uses to decide whether PG&E undergrounds service connections in a given location.

**ANSWER 004**

Our 10,000-mile undergrounding program is focused on undergrounding higher-voltage primary distribution powerlines in areas of high fire risk. While there is a degree of risk anywhere there are energized overhead facilities, historically, we have observed more frequent ignitions and larger wildfires associated with the overhead primary distribution powerlines. This is compared to lower voltage secondary distribution lines, service connections, and high voltage transmission lines.

At this time, we are not undergrounding lower voltage secondary lines or service drops to address risk. In most cases overhead lower voltage secondary lines and service drops will remain overhead. There are some cases in which we may underground secondary powerlines, such as when lines run parallel to the trench path or for constructability reasons. In these special cases, the poles attached to the secondary lines will be removed.

We will overhead harden remaining secondary and service lines by replacing open-wire secondary, gray services, and tree-connects with the current standard covered aerial conductor. We have also recently started to apply "breakaway" connectors to our standard construction system-wide to help mitigate any residual risk on the service and secondary wire. Poles will remain in these instances to continue to support the remaining service/secondary wire and any communication lines remaining on those poles.