

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

PG&E Data Request No.:	TURN_012-Q001		
PG&E File Name:	WMP-Discovery2023_DR_TURN_012-Q001		
Request Date:	May 8, 2023	Requester DR No.:	TURN-PG&E-12
Date Sent:	May 11, 2023	Requesting Party:	The Utility Reform Network
DRU Index #:		Requester:	Tom Long

**SUBJECT: SYSTEM HARDENING/GENERAL**

**QUESTION 001**

Please confirm that the Simplified Wildfire Risk Spend Efficiency (SWRSE) and Wildfire Feasibility Expenditure (WFE) measures discussed on page 968 of PG&E's WMP:

- a) Are only calculated by PG&E for undergrounding projects; and
- b) Cannot be used to compare the cost-effectiveness of undergrounding projects with any other projects.
- c) If PG&E does not unequivocally agree with "a" and "b" above, please explain why it does not.

**ANSWER 001**

- a) Yes.
- b) Correct, the intent of calculating SWRSE and WFE was to support the selection process for targeted undergrounding projects only.
- c) We agree with a and b as stated above, with additional clarification about how WFE may result in the deployment of other mitigation approaches. The WFE score is used to prioritize and select highest risk-cost effectiveness circuit segments with the expectation that the circuits will be placed underground. During the detailed project scoping performed by PG&E's engineering team, portions of circuit segments may be identified as infeasible to be placed underground for various environmental, operational, or technical reasons. In those cases, portions of the circuit segments selected using WFE may be hardened through line removal and/or overhead hardening, instead of undergrounding.