

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2022
Data Response**

PG&E Data Request No.:	CalAdvocates_027-Q02		
PG&E File Name:	WMP-Discovery2022_DR_CalAdvocates_027-Q02		
Request Date:	July 20, 2022	Requester DR No.:	CalAdvocates-PGE-2022WMP-27
Date Sent:	July 25, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

SUBJECT: PG&E's JULY 11, 2022 RESPONSE TO THE REVISION NOTICE FOR PACIFIC GAS AND ELECTRIC COMPANY'S 2022 WILDFIRE MITIGATION PLAN UPDATE ISSUED BY ENERGY SAFETY ON MAY 26, 2022

Questions 2-3 relate to PG&E's response to Critical Issue RN-PG&E-22-03 (hereinafter PG&E's July 11, 2022 response).

QUESTION 02

Table RN-PG&E-22-03-02 on page 38 of PG&E's July 11, 2022 response states that 59 miles of undergrounding work will be performed in the top 20% risk-ranked circuit segments in 2022.

Cal Advocates reviewed attachment "2022-02-25_PGE_2022_WMP-Update_R0_Section 4.6_Remedies 21-14_Atch01_CONF_R1.xlsx" to PG&E's 2022 WMP Update to estimate the percentage of undergrounding work that was planned in the top 20% risk-ranked circuit segments. To determine this, Cal Advocates filtered Column W (2021 Risk Rank) to show only circuit segments ranked from 1-727,² and filtered column G (Planned UG Miles) to include only projects with planned underground miles. To estimate a lower bound of planned 2022 underground work, Cal Advocates subtracted the sum of filtered column H (Planned OH Miles) from the sum of filtered column M (2022 Forecast Miles), resulting in approximately 90.6 miles of planned 2022 undergrounding work.

- a) Please explain why the planned 2022 undergrounding mileage in the top 20% risk-ranked circuit segments in Table RN-PG&E-22-03-02 of PG&E's July 11, 2022 response is substantially lower than the planned undergrounding mileage in the top 20% risk-ranked circuit segments in attachment "2022-02-25_PGE_2022_WMP-Update_R0_Section 4.6_Remedies 21-14_Atch01_CONF_R1.xlsx" to PG&E's 2022 WMP Update.
- b) Please correct any errors in Cal Advocates' analysis, described above.
- c) Did PG&E reduce its planned 2022 undergrounding mileage in the top 20% risk-ranked circuit segments between filing its 2022 WMP Update on February 25, 2022, and filing its July 11, 2022 response to Energy Safety?

² Per PG&E's response to data request CalAdvocates-PGE-2022WMP-19, question 1.

- d) If the answer to part (c) is yes, please state the basis for PG&E's decision to reduce its planned 2022 undergrounding mileage in the top 20% risk-ranked circuit segments.

ANSWER 02

- a) Table RN-PG&E-22-03-02 reflects the miles that are most likely to be completed in 2022. The table reflects adjustments for execution risk in the 2022 portfolio and thus the miles in Table RN-22-03-02 are lower. In general, PG&E develops a yearly workplan with more miles than the goal to account for projects that may be delayed as the result of one or more External Factors.³ The workplan provided in response to Remedy PG&E-21-14 did not include any adjustments to reflect the delays that undergrounding projects may experience as a result of one or more External Factors and thus the number of 2022 underground miles in the attachment to Remedy PG&E-21-14 is higher than the number in Table RN-22-03-02. Please note, however, that any project included in the 2022 workplan that does not get built because of delays resulting from one or more External Factors will be completed in subsequent years once the External factors are resolved.
- b) PG&E calculates 92.0 miles in the Top 20% risk ranked circuit segments for 2022 execution in attachment "2022-02-25_PGE_2022_WMP-Update_R0_Section 4.6_Remedy 21-14_Atch01_CONF_R1.xlsx" by using the following steps:
- Column W (2021 Risk Rank) – filter for values less than 727
 - Column M (2022 Forecast Miles) – filter for non-zero values
 - Column G (Planned UG Miles) – filter for non-zero values
 - From the sum of Column G (Planned UG Miles), remove the sum of
 - Column H (Planned OH Miles)
 - Column I (Planned Removal Miles)
 - Column N (2023 Forecast Miles)
- c) Please see subpart (a) above.
- d) Please see subpart (a) above.

³ External Factors are defined on p. 1034 of the 2022 WMP.