

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

PG&E Data Request No.:	SPD_006-Q002		
PG&E File Name:	WMP-Discovery2023_DR_SPD_006-Q002		
Request Date:	May 17, 2023	Requester DR No.:	Data Request SPD_PG&E_2023_006
Date Sent:	May 22, 2023	Requesting Party:	Safety Policy Division
DRU Index #:		Requester:	Kevin Miller

SUBJECT: FOLLOW UP TO 5/3 MEETING ON UNDERGROUNDING RISK EFFECTIVENESS

QUESTION 002

PG&E asserted that PG&E is addressing the risk from secondary lines and service drops in part via replacing the secondary with covered aerial conductor and breakaway connectors at service drops [see PG&E's response to Question 4.b of SPD_PG&E_2024_003 for additional description]. PG&E also stated that there may need to be a messaging update because the 99% mitigation effectiveness is only meant to apply to primary lines not their entire wildfire risk.

- a. How does PG&E foresee clarifying this information in its messaging?
- b. To whom?

ANSWER 002

- a. As discussed during a staff meeting with SPD on May 3, 2023, PG&E currently states in talking points, the PG&E website, and in customer materials that "Placing overhead powerlines underground reduces ignition risk by approximately 99% *in that location*." PG&E intended the phrase "in that location" to articulate that the 99% risk mitigation applied to the areas, or the circuit segments, actually being undergrounded, and not to other areas beyond where the undergrounding takes place. This would not apply to lateral secondary lines and service drops because they are not being undergrounded. PG&E has considered providing more specificity to this talking point, such as "undergrounding is 99% effective in mitigating wildfire risk on the electric distribution primary lines being undergrounded." However, PG&E routinely receives feedback from customers, advocacy groups, regulators, and others to keep customer-facing language simple and easy to digest. Semi-technical language like "electric distribution primary lines," or other variations of that phrase, may not be ideally suited for customer-facing communications and will have to be tested and reviewed to ensure it is helpful and does not add confusion for the customers, communities, and other stakeholders that PG&E serves. PG&E will evaluate this language through testing upon completion of the mitigation alternatives analysis as described below.

In alignment with PG&E's response to SPD_006_Q001, PG&E is completing an analysis of alternative combinations of multiple wildfire mitigations, including the

consideration of undergrounding secondary lines and services for inclusion in our SB 884 10-year Undergrounding Plan filing. Pending the results of the new analyses for the SB 884 Plan, the various communication channels that carry PG&E's undergrounding messaging will be updated, as needed. PG&E will also update future relevant filings with any updated language or findings, including the SB 884 10-Year Undergrounding Plan and future WMP updates.

- b. If necessary, based on the new analysis described above, PG&E will update future communications on the undergrounding program to optimize clarity on the scope and impact of its undergrounding effort. Future communications will likely include communications to many interested stakeholders including regulators and intervenors, customers, communities, and the media.