

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans
Rulemaking 18-10-007
Data Response**

PG&E Data Request No.:	CalAdvocates_046-Q02		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_046-Q02		
Request Date:	March 1, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-12
Date Sent:	March 8, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to PG&E's 2021 Wildfire Mitigation Plan (WMP) Update.

SUBJECT: DETAILED INSPECTIONS

QUESTION 02

Section 7.3.3.17.1 of PG&E's 2021 WMP, System Hardening – Distribution, includes the following system hardening methods:

Line Removal (p. 550)

Relocation of Overhead to Underground (p. 550)

Primary and secondary covered conductor replacement (p. 551)

Pole Replacements (p. 552)

Replacement of Non-Exempt Equipment (p. 552)

Replacement of Overhead Distribution Line Transformers (p. 552)

Framing and Animal Protection Upgrades (p. 552)

Vegetation Clearing (p. 552)

PG&E's Table 12 identifies the following spending associated with section 7.3.3.17.1:

Actual	Actual	Actual	Projected	Projected	Projected	Projected	Projected	Projected
CAPEX (\$ thousand s)	OPEX (\$ thousand s)	Line miles to be treated	CAPEX (\$ thousand s)	OPEX (\$ thousand s)	Line miles to be treated	CAPEX (\$ thousand s)	OPEX (\$ thousand s)	Line miles to be treated
2020	2020	2020	2021	2021	2021	2022	2022	2022
\$460,142	\$0	342	\$338,400	\$0	180	\$872,320	\$0	470

- a. Please fill out the table below, disaggregating the actual and projected spending amounts as shown. Add extra columns as needed.

	Total	Line Removal	Relocation of Overhead to Underground	Primary and Secondary Covered Conductor Replacement	Pole Replacements	Replacement of Non-Exempt Equipment	Replacement of Overhead Distribution Line Transformers	Framing and Animal Protection Upgrades	Vegetation Clearing	Other (Please Explain)
2020 CAPEX	\$460,142									
2021 CAPEX	\$338,400									
2022 CAPEX	\$872,320									

- b. Please fill out the table below, providing the actual or projected number of miles treated by that method per year. Add extra columns as needed.

	Total Miles Treated	Line Removal	Relocation of Overhead to Underground	Primary and Secondary Covered Conductor Replacement	Pole Replacements	Replacement of Non-Exempt Equipment	Replacement of Overhead Distribution Line Transformers	Framing and Animal Protection Upgrades	Vegetation Clearing	Other (Please Explain)
2020	342									
2021	180									
2022	470									

ANSWER 02

Cal Advocates may have misunderstood the description of PG&E's System Hardening Program in Section 7.3.3.17.1 of the 2021 WMP. In the 2021 WMP, PG&E described three options for system hardening: (1) line removal and remote grid; (2) relocation of overhead to underground; and (3) overhead system hardening. The columns in the table above for primary and secondary covered conductor replacement, pole replacement, etc. are potential elements of overhead system hardening. See 2021 WMP at p. 551. These are not separate options for the System Hardening Program. With that clarification, please note additional detail is not provided for the next 6 columns (Pole Replacements, Replacement of Non-Exempt Equipment, Replacement of Overhead Distribution Line Transformers, Framing and Animal Protection Upgrades, Vegetation Clearing, and Other), because those are not distinct parts of the System Hardening program.

- a. We are adding a column for 2020 to cover hybrid projects that are less than 90% overhead work and less than 60% underground work. In addition, the "Other" column contains miscellaneous orders with no planned miles currently. The numbers for 2021 and 2022 are forecasts only and may vary based on the actual work performed or based on more updated information.

	Total	Line Removal	Relocation of Overhead to Underground	Primary and Secondary Covered Conductor Replacement	Hybrid Overhead / Underground Conductor Project	Pole Replacements	Replacement of Non-Exempt Equipment	Replacement of Overhead Distribution Line Transformers	Framing and Animal Protection Upgrades	Vegetation Clearing	Other (Please Explain)
2020 CAPEX	\$460,142	N/A	\$7,974	\$439,337	\$10,287	N/A	N/A	N/A	N/A	N/A	\$2,544
2021 CAPEX	\$338,400	N/A	\$79,200	\$259,200	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2022 CAPEX	\$872,320	N/A	\$195,520	\$676,800	N/A	N/A	N/A	N/A	N/A	N/A	N/A

- b. Please note that the 2020 CAPEX listed above (~\$460M) does not include the 3.4 miles listed below for Line Removal. The 2020 CAPEX figure is captured through our Major Work Category 08W program while line mile removal is captured under a different MWC/MAT code. Please also note that 2020 costs above are for projects that span multiple years, ex. they include close out costs for 2019 projects and readiness costs for 2022+ projects. Therefore, lifecycle unit costs cannot be determined solely with 2020 costs and 2020 construction units complete.

	Total Miles Treated	Line Removal	Relocation of Overhead to Underground	Primary and Secondary Covered Conductor Replacement	Pole Replacements	Replacement of Non-Exempt Equipment	Replacement of Overhead Distribution Line Transformers	Framing and Animal Protection Upgrades	Vegetation Clearing	Other (Please Explain)
2020	342	3.4	5.6	333	N/A	N/A	N/A	N/A	N/A	N/A
2021	180	N/A	18	162	N/A	N/A	N/A	N/A	N/A	N/A
2022	470	N/A	47	423	N/A	N/A	N/A	N/A	N/A	N/A