

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans Discovery 2023-2025**  
**Data Response**

PG&E Data Request No.:	CalAdvocates_044-Q005		
PG&E File Name:	WMP-Discovery2023-2025_DR_CalAdvocates_044-Q005		
Request Date:	April 15, 2024	Requester DR No.:	CalAdvocates-PGE-2025WMP-08
Date Sent:	April 18, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

**SUBJECT: COST EFFECTIVENESS**

**QUESTION 005**

Page 57 of PG&E's 2025 WMP Update states,

“Regarding cost effectiveness scores, the undergrounding projects in PG&E's current workplan were previously selected using a methodology (WDRM V2 and V3) that did not incorporate cost effectiveness scores for individual projects. Therefore, cost effectiveness scores are not available.”

- a) Define the term “undergrounding project” in the above statement.
- b) Has PG&E used the outputs from WDRM v4 to calculate the cost effectiveness scores for the undergrounding projects in PG&E's current workplan?
- c) If the answer to part (b) is yes, please provide the cost effectiveness scores for all projects in PG&E's current undergrounding workplan.
- d) If the answer to part (b) is no, explain why not.
- e) Does PG&E plan to use the outputs from WDRM v4 to calculate the cost effectiveness scores for the undergrounding projects in PG&E's current workplan?
- f) If the answer to part (e) is yes, when does PG&E anticipate completing this analysis?
- g) If the answer to part (e) is no, explain why not.

**ANSWER 005**

- a) As stated in PG&E's Comments on CPUC Safety Policy Division staff's original proposed guidelines for the SB 884 program (September 27, 2023), PG&E defines a “project” at the circuit segment level (also referred to as circuit protection zone (CPZ)) because our current risk model measures risk at the circuit segment level and does not have more granular risk detail. When projects are scoped and planned for near-term completion (generally within 3 to 4 years), we create sub-projects, or jobs, which will reflect portions of a CPZ. PG&E identifies jobs based on mileage, diversity of risk ranking, dependencies (e.g., easements, environmental permitting issues) and constructability. As the risk models are periodically updated and released, projects may be added to the workplan, reprioritized, or removed.

- b) No, WDRM v4 has not been used for the current workplan.
- c) Not applicable, please see the response to subpart (b) above.
- d) WDRM v2 and v3 were applicable for the current workplan. WDRM v4 analysis is intended to be applied to the workplan for projects that will be completed starting from 2027. PG&E does not currently anticipate completing any projects selected with WDRM v4 in the 2023 GRC period. It is possible, but unlikely, that some of these projects may be completed prior to 2027 based on the timing to complete and construct the project in relation to all other projects in the current workplan.
- e) No, the current workplan uses WDRM v2 and v3 only. WDRM v4 analysis is intended to be applied to the workplan from 2027.
- f) Not applicable, please see the response to subpart (e) above.
- g) Per the requirements of SB-884, PG&E is developing the Wildfire Benefit Cost Analysis (WBCA) tool to evaluate the costs and benefits of undergrounding and other alternative mitigations. PG&E intends to use the outputs of WDRM v4 in the WBCA, which is intended to be applied to the workplan for projects completed starting in 2027.