

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

PG&E Data Request No.:	CalAdvocates_038-Q003		
PG&E File Name:	WMP-Discovery2023-2025_DR_CalAdvocates_038-Q003		
Request Date:	March 20, 2024	Requester DR No.:	CalAdvocates-PGE-2025WMP-02
Date Sent:	April 15, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

Please note that, for this data request, the geographical regions are mutually exclusive (i.e., “Other HFTD” excludes areas that are in either Tier 2 or Tier 3). Therefore, for any given circuit, the following relationships should hold:

- Tier 2 miles + Tier 3 miles + Other HFTD miles = total HFTD miles.
- Tier 2 miles + Tier 3 miles + Other HFTD miles + non-HFTD miles = total circuit miles.

**QUESTION 003**

Provide an Excel table of all distribution circuits existing as of January 1, 2023 (as rows) that were removed or decommissioned in 2023, either partially or entirely. This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns:

- a) Circuit name
- b) Circuit ID number
- c) Circuit miles removed or decommissioned in Non-HFTD
- d) Circuit miles removed or decommissioned in Other HFTD
- e) Circuit miles removed or decommissioned in HFTD Tier 2
- f) Circuit miles removed or decommissioned in HFTD Tier 3
- g) Reason(s) for removal or decommissioning.

**ANSWER 003**

Please see attachment *WMP-Discovery2023-2025\_DR\_CalAdvocates\_038-Q003Atch01.xlsx*, which provides information regarding removal of primary distribution lines in HFTD in 2023, as well as the underground miles installed, which is a subset of the requested information available at this time. This response is generally consistent with the one we provided last year in response to the same question (CalAdvocates-PGE-2023WMP-03).

The information provided is specific to projects within PG&E’s 2023-2025 WMP Initiative GH-01 (System Hardening). However, there may be additional circuits that were

removed or decommissioned, either partially or entirely, outside of the System Hardening program (e.g. via maintenance and construction).

Historically, PG&E did not track line removals when relocating overhead to underground, removing secondary services, or removing lines in non-HFTD. However, based on the 2023 GRC Decision (D.) 23-11-069 OP23, PG&E is preparing to report the 2023 miles of overhead lines removed during underground projects in the annual System Hardening Accountability Report, which will be distributed to the GRC service list by July 1, 2024. For transparency in this response, we have included the Undergrounding miles installed by project in 2023. A conversion factor of one (1) mile of overhead miles removed to 1.25 miles of undergrounding installed may be applied to estimate the overhead miles removed. This conversion factor was adopted by the CPUC in GRC D.23-11-069, Conclusion of Law 80 (page 862).

Below we provide additional information to clarify the data provided in the attachment in response to the request.

- a) Circuit name: please see column C.
- b) Circuit ID number: please see column D.
- c) Distribution circuit miles removed or decommissioned in non-HFTD Areas: column E indicates the HFTD Tier by project, including **Tier 1** (see definition tab for the definitions of the HFTD tiers included). Column G includes the associated line removal circuit miles, and column H includes the underground miles installed (see note above regarding the overhead to underground conversion factor).
- d) Distribution circuit miles removed or decommissioned in other HFTD: column E indicates the HFTD Tier by project, **including HFTD Buffer Zone and Zone 1** (see definition tab for the definitions of the HFTD tiers included). Column G includes the associated line removal circuit miles, and column H includes the underground miles installed (see note above regarding the overhead to underground conversion factor).
- e) Distribution circuit miles removed or decommissioned in HFTD Tier 2: column E indicates the HFTD Tier by project, **including Tier 2** (see definition tab for the definitions of the HFTD tiers included). Column G includes the associated line removal circuit miles, and column H includes the underground miles installed (see note above regarding the overhead to underground conversion factor).
- f) Distribution circuit miles removed or decommissioned in HFTD Tier 3: column E indicates the HFTD Tier by project, **including Tier 3** (see definition tab for the definitions of the HFTD tiers included). Column G includes the associated line removal circuit miles, and column H includes the underground miles installed (see note above regarding the overhead to underground conversion factor).
- g) Reason(s) for removal or decommissioning: please see Column F, which notes the name of one of the program / reasons for removal or decommission that is associated with the project (see definition tab for the definitions of the Program included).

**ATTACHMENT:**

*WMP-Discovery2023-2025\_DR\_CalAdvocates\_038-Q003Atch01.xlsx*