

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

PG&E Data Request No.:	CalAdvocates_019-Q011		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_019-Q011		
Request Date:	April 25, 2023	Requester DR No.:	CalAdvocates-PGE-2023WMP-19
Date Sent:	April 28, 2023	Requesting Party:	Public Advocates Office
DRU Index #:		Requester:	Holly Wehrman

The following questions relate to your 2023-2025 WMP submission and your responses to data request CalAdvocates-PGE-2023WMP-15.

QUESTION 011

Pages 968-969 of PG&E's WMP describe PG&E's simplified wildfire risk spend efficiency (SWRSE), used to prioritize its undergrounding projects. Page 1006 states, "For the Undergrounding Program, we selected the roughly 8,000 OH miles with the highest SWRSE to produce roughly 10,000 miles of undergrounding."

- a) Is there a threshold SWRSE value at which PG&E determines that covered conductor is a more suitable mitigation than undergrounding? Please explain your answer.
- b) Is there a threshold SWRSE value at which PG&E determines that undergrounding is not a suitable mitigation? Please explain your answer.
- c) Does PG&E plan to underground any portion of line with a lower SWRSE than those top 8,000 OH miles that were selected for undergrounding (as described in the quote above)? Please explain your answer.

ANSWER 011

- a) No, there is no threshold in SWRSE that we use to determine that covered conductor is a more suitable mitigation than undergrounding. SWRSE helps provide ranking of locations which have higher risk spend efficiency to mitigate wildfire work as compared to other locations and is used to select miles for undergrounding. Regarding the decision between covered conductor and undergrounding, the overall consideration of the amount of risk reduction the mitigation provides is important. By undergrounding, the amount of residual risk is virtually removed, while covered conductor does not fully mitigate the risk.
- b) No, there is not currently a threshold of SWRSE that we use to determine that undergrounding is not a suitable mitigation. In these early stages of our permanent system resilience mitigation work (undergrounding), we are focusing on undergrounding miles in the highest risk areas as defined in Section 8.1.2.2 of the 2023-2025 WMP, which include high risk circuits based on our risk models, fire rebuild projects, PSPS mitigation projects, and areas identified by Public Safety Specialists. We are exploring the potential use of a threshold based on the cost

benefit of the investment and the risk exposure it avoids, as part of our longer-term undergrounding plans.

- c) SWRSE is one of the first steps in identifying miles for Undergrounding. When We scope a location for undergrounding, we review adjacent circuit segments for consideration beyond wildfire. For example, if there is potential to minimize PSPS or EPSS impact on top of the existing wildfire risk at those nearby adjacent circuit segments, we will consider expanding the scope of the undergrounding project to address those needs. Additionally, there are other cases in which we may underground, for example, for fire rebuild.