

**PACIFIC GAS AND ELECTRIC COMPANY
WILDFIRE MITIGATION PLANS DISCOVERY 2023-2025
DATA RESPONSE**

PG&E Data Request No.:	CalAdvocates_051-Q001		
PG&E File Name:	WMP-Discovery2023-2025_DR_CalAdvocates_051-Q001		
Request Date:	July 9, 2024	Requester DR No.:	CalAdvocates-PGE-2025WMP-15
Date Sent:	July 12, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

The following questions relate to your 2023-2025 WMP R6, submitted to Energy Safety on July 5, 2024.

QUESTION 001

On page 410 of PG&E’s 2023-2025 WMP R6, Table PG&E-8.1.2-3 is presented as the following (referred to herein as the July 5 table):

TABLE PG&E-8.1.2-3:
PG&E UNDERGROUNDING WORKPLAN 2023-2026
(DATA AS OF 8/28/24 TO REFLECT 2024 WMP CHANGE ORDER AND 2025 WMP UPDATE)

Portfolio Year	2023				2024				2025				2026				2023 - 2026			
	# of Portfolio Miles				265				468				308				1406			
Program Category	SH	Comm. Rebuild	Total Miles	% of Portfolio	SH	Comm. Rebuild	Total Miles	% of Portfolio	SH	Comm. Rebuild	Total Miles	% of Portfolio	SH	Comm. Rebuild	Total Miles	% of Portfolio	SH	Comm. Rebuild	Total Miles	% of Portfolio
Top 20% Risk-Ranked Circuit Segments	223		223	61%	180		180	68%	413		413	88%	298		298	97%	1114	0	1114	79%
Other High Risk																				
Fire Rebuild ^(a)	35	76	111	30%	9	47	55	21%	11	29	39	8%	1	1	2	1%	56	152	208	15%
PSPS	20		20	5%	29		29	11%	7		7	1%	0		0	0%	56		56	4%
PSS Identified	3		3	1%	0		0	0%	0		0	0%	0		0	0%	3		3	0%
UG System Hardening	4		4	1%	0		0	0%	6		6	1%	6		6	2%	17		17	1%
Other UG Programs ^(b)	4		4	1%	0		0	0%	3		3	1%	2		2	1%	9		9	1%
Total	289	76	365	100%	218	47	265	100%	440	29	468	100%	307	1	308	100%	1254	152	1406	100%

Note: The 2023 risk rank for segments is based on the 2021 WDRM v2. The 2024-2026 risk rank for segments is based on the 2022 WDRM v3. Numbers may vary due to rounding.
(a) Fire Rebuild miles are based on current, known rebuild needs. These miles may change due to future wildfire activity, which may affect other mileage goals in the 2022-2026 workplan.
(b) Other underground projects that are not in the top risk ranked circuits (e.g., Rule 20, WRO, Capacity).

On April 5, 2024, in response to data request CalAdvocates-PGE-2025WMP-03, question 11 (CalAdvocates_039-Q011), PG&E provided the following version of Table PG&E-8.1.2-3 (referred to herein as the April 5 table):

PG&E Undergrounding Workplan 2023-2026
(Data as of 2/22/24)

Portfolio Year Target # of Portfolio Miles	2023				2024				2025 - 2026				2023 - 2026				
	SH	Butte	Total Miles	% of Portfolio	SH	Butte	Total Miles	% of Portfolio	SH	Butte	Total Miles	% of Portfolio	SH	Butte	Total Miles	% of Portfolio	
	360				250				760				1360				
	363				288				848				1498				
Top 20% Risk-Ranked Circuit Segments	223		223	62%	204		204	71%	795		795	94%	1222	0	1222	82%	
Other High Risk	Fire Rebuild ^a	35	73	109	30%	8	40	49	17%	12	32	44	5%	55	146	201	13%
	PSPS	20		20	6%	33		33	12%	2		2	0%	56	0	56	4%
	PSS Identified	3		3	1%				0%				0%	3	0	3	0%
	UG System Hardening	4		4	1%				0%	4		4	1%	8	0	8	1%
Other UG Programs ^b	4		4	1%	2		2	1%	2		2	0%	8	0	8	1%	
Total	289	73	363	100%	248	40	288	100%	816	32	848	100%	1352	146	1498	100%	

(a) Fire Rebuild miles are based on current, known rebuild needs. These miles may change due to future wildfire activity, which may affect other mileage goals in the 2022-2026 workplan.
(b) Other underground projects that are not in the top risk ranked circuits (e.g., Rule 20, WRO, Capacity)

State the basis for why PG&E made each of the following changes to Table PG&E-8.1.2-3 in the three months from April 5, 2024 to July 5, 2024:

- a) In 2023, the total number of miles in the “Fire Rebuild” category is 109 miles in the April 5 table, but 111 miles in the July 5 table.
- b) In 2024, the total number of miles in the “Top 20% Risk-Ranked Circuit Segments” category is 204 miles in the April 5 table, but 180 miles in the July 5 table.
- c) In 2024, the total number of miles in the “Fire Rebuild” category is 49 miles in the April 5 table, but 55 miles in the July 5 table.
- d) In 2024, the total number of miles in the “PSPS” category is 33 miles in the April 5 table, but 29 miles in the July 5 table.
- e) In 2024, the total number of miles in the “Other UG Programs” category is 2 miles in the April 5 table, but 0 miles in the July 5 table.
- f) In the two-year period from 2025 to 2026, the total number of miles in the “Top 20% Risk-Ranked Circuit Segments” category is 795 miles in the April 5 table, but 711 miles in the July 5 table.
- g) In the two-year period from 2025 to 2026, the total number of miles in the “Fire Rebuild” category is 44 miles in the April 5 table, but 41 miles in the July 5 table.
- h) In the two-year period from 2025 to 2026, the total number of miles in the “PSPS” category is 2 miles in the April 5 table, but 7 miles in the July 5 table.
- i) In the two-year period from 2025 to 2026, the total number of miles in the “UG System Hardening” category is 4 miles in the April 5 table, but 12 miles in the July 5 table.
- j) In the two-year period from 2025 to 2026, the total number of miles in the “Other UG Programs” category is 2 miles in the April 5 table, but 5 miles in the July 5 table.

ANSWER 001

As described in our WMP Section 8.1.2.2, PG&E's undergrounding workplan evolves overtime. Project schedules can change because of project dependencies, such as permitting and easement delays. Further, the workplan evolved to account for the 2023 GRC Decision. Below describes the changes specifically made between when the two workplans were submitted between April 5 and July 5.

- a) The July 5 table incorporates miles from Greenville Community Rebuild projects. These projects were inadvertently missing from all versions of the summary table prior to the July 5 version.
- b) This change was driven by seven projects shifting schedules from 2024 to 2025 and one from 2024 to 2026.
- c) As with subpart (a), the July 5 table incorporates miles from Greenville Community Rebuild projects. These projects were inadvertently missing from all versions of the summary table prior to the July 5 version.
- d) This change was driven by two projects shifting schedules from 2024 to 2025.
- e) This change was driven by one project shifting schedule from 2024 to 2025.
- f) The primary driver in the reduction of miles for 2025-2026 is the need to align the workplan to the 2023-2026 GRC mileage targets. These changes include removing existing projects and adding/scoping to drive to the GRC risk reduction targets.
- g) This change was driven by Butte Rebuild project schedule changes between 2024 and 2025 (one project moved from 2024 to 2025, another from 2025 to 2024), resulting in a net impact of increased miles in 2024 and reduced miles in 2025-2026.
- h) This change was driven by the same two projects described in subpart (d), plus one project being removed from the workplan.
- i) One four-mile project from the April 5 table has been removed from the July 5 table, and 12 miles from eight projects were added. Of the 12 miles added, 11 miles are in the Top 20% Risk category and will be moved accordingly once risk reduction calculations have been updated in our system of record for the associated projects.
- j) This change was driven by the same project described in subpart (e), as well as a single new project that was missing risk rank data at the time of the July 5 report creation. This will be updated in our system of record and will be included in future iterations of this table.