

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

PG&E Data Request No.:	SPD_021-Q001Supp02
PG&E File Name:	WMP-Discovery2023-2025_DR_SPD_021-Q001Supp02
Request Date:	September 10, 2024
Requester DR No.:	SPD_WSPS_PG&E_2024_011
Requesting Party:	Safety Policy Division
Requester:	Kevin Miller
Date Sent:	October 4, 2024 Supp02: October 18, 2024

QUESTION 001

Complete tabs 2 through 6 of the attached spreadsheet. For tabs 2 through 5, complete a corresponding data row for each of the 114 mitigation initiatives in the most recent QDR, Table 11 according to the directions in the spreadsheet and the two attached guidance documents listed below:

- Guidance for WMP Cost Reporting (applicable to tab 2 through 5)
- Guidance for Account Tracking (applicable to tab 6)

ANSWER 001 SUPPLEMENTAL 02 – OCTOBER 18, 2024

Please see attachment “*WMP-Discovery2023-2025_DR_SPD_021-Q001Supp02Atch01.zip*” for Tranche 3/Supp02 of this request.

Note, the clarifications provided in previous Tranches also apply to this request.

Tranche 3 includes Situational Awareness (SA) 03, 07, 08, 09 and 12 Wildfire Mitigation Plan (WMP) initiatives SA which only include work in High Fire Threat District (HFTD) areas.

Some of the initiatives being provided include blank cells for costs in the worksheets. These initiatives have costs; however, the costs are in a Provider Cost Center (PCC) for the WMP objective, and line-item costs are not able to be extracted.

Some initiatives being provided reflect (0) for costs in the worksheets. These initiatives have costs related to the WMP, however, their recorded or forecasted costs are currently \$0.

PG&E has provided WMP units for unitized initiatives in their applicable tab. Note, if units are capital than they are reflected only in the “CapEx” tabs; likewise, if units are expense, they are only reflected in the “OpEx” tabs. PG&E did not repeat unit data on other tabs, even if costs are present. Blank cells in the unit columns indicate that the work is either not unitized, or that PG&E executed 0 units of the work.

ANSWER 001 SUPPLEMENTAL 01 – OCTOBER 11, 2024

Please see attachment “WMP-Discovery2023-2025_DR_SPD_021-Q001Supp01Atch01.zip” for Tranche 2/Supp01 of this request.

Regarding the “General Info (1 of 5)” worksheet, PG&E is providing the Risk Spend Efficiency (RSE) from the 2023 GRC application as available, as Cost-Benefit Ratios (CBR)s were not calculated when the 2023 GRC was filed. The Column labeled “Cost requested in original GRC Application (\$000s)” has been completed based on PG&E’s 2023 GRC Reply Brief (December 9, 2022) with the non-labor escalation update. The Column labeled “GRC Activity Section and Page Number” refers to the sections as filed in the 2023 GRC February 25, 2022, update and the page number is as reported in the table of contents for the Exhibit and Chapter for the referenced section.

Please see the following clarifications for Sections of the attachment included in this request. Note, data is not included in worksheets “non-HFTD, CapEx (4 of 5)” or “non-HFTD, OpEx (5 of 5)” as costs reported in this Tranche only reflect High Fire Threat District (HFTD) work.

Regarding “Section A: “WMP Cost and Unit Data”, PG&E will provide recorded costs for 2023 and forecast costs for 2024 and 2025. Units have been provided for unitized WMP initiatives in the “HFTD, CapEx (2 of 5)” worksheet. Please see “General Info (1 of 5)” worksheet, Column “Type of Units (e.g., miles, # of inspections, # of poles repaired/replaced, etc.)” for initiatives with corresponding units. Note, these units have not been replicated in the “HFTD, OpEx (3 of 5)” worksheet as PG&E did not want to appear to be duplicating these units.

Regarding “Section B: Costs and Units Authorized in Last GRC,” the column requesting “Costs authorized in last GRC (2023 (\$)) for WMP 2023”, represents PG&E’s final escalated General Rate Case (GRC) forecasts.

Regarding “Section C: Costs and Units Forecast to be Requested in the Next GRC,” PG&E is unable to provide forecasted data for the next GRC submission at this time as it is still under development. This information will be provided in the next update to this data request after PG&E’s next GRC filing in May 2025.

Regarding “Section D: Costs Recovered via Application (Memo or Balancing Account),” per PG&E’s discussion with SPD on September 27, 2024, costs reflected are recorded and not recovered.

Regarding “Section E: SB 884 Activity,” PG&E anticipates submitting its SB 884 Electric Undergrounding Plan in 2025. Work forecast in the SB 884 Electric Undergrounding Plan will begin in 2027. Therefore, there are no forecast units and no forecast costs for SB 884 in 2023, 2024, or 2025.

Regarding “Section F: FERC or Other,” PG&E is unable to provide forecasted data for this category. Transmission project costs are not tracked at the level of granularity required to identify if Wildfire Mitigation Plan (WMP) Initiative tracking codes are applicable. In addition, mitigations listed in the WMP are not included at the project level but rather program level. PG&E will provide data only for WMP related Transmission activities in this section. Per PG&E’s discussion with SPD on September 27, 2024, these costs will only be available for a small sub-set of transmission programs as they pertain to the WMP.

For the three initiatives (Situational Awareness (SA)-02; SA-10; SA-11) being provided in this response, they are only applicable to the following tab: CapEx HFTD. The other three tabs will be blank for these initiatives. Please advise if SPD prefers PG&E to remove rows or include non-applicable, when relevant, instead of leaving these cells blank.

ANSWER 001

PG&E and SPD met on September 27, 2024, to discuss clarifications within this request as well as a tranche schedule for production. Per this meeting, and follow up correspondence from SPD received October 1, 2024, PG&E will submit data on a weekly basis in tranches to SPD, with all data being submitted by November 1, 2024.

PG&E would like to clarify that there are 109 activities with costs related to the Wildfire Mitigation Plan (WMP).

PG&E is providing Columns A-G of the “General Info (1 of 5)” worksheet in Tranche 1, as well as information regarding SB 884. Please see attachment “*WMP-Discovery2023-2025_DR_SPD_021-Q001Atch01.zip*” for Tranche 1 of this request.

Please see the following explanations per the instructions to report on the Utility Tracking ID included in Table 11 from the most recent Quarterly Data Report (QDR). Table 11 of the QDR includes:

- WMP Initiative Categories (Column B);
- WMP Initiative Activities (Column C), which are a subset of initiative categories; and
- Utility Initiative Tracking IDs (UITID) (Column D) for WMP commitments.

Table 11 shows some costs at the level of a specific commitment, such as CO-05 or GH-07, while it shows others at the level of an Initiative Activity. Within the latter group, Table 11 shows that some Initiative Activities have associated commitments, while others do not.

In this data request response, PG&E listed each commitment in its own row, and, for those Initiative Activities with no associated commitments, listed each remaining Initiative Activity (‘Emergency Preparedness Plan’, ‘Fire Potential Index’) as its own row.

PG&E used naming and unique keys consistent with both the QDR and the WMP to identify each row. For commitments, PG&E used the UITIDs, which can be found in Table 1 of the QDR, and for Initiative Activities with no commitments, PG&E used Table PG&E-A-2: Definitions of Initiatives – By Category in the WMP (version R6 pp. 990-996), located at the following link: <https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/pge-wmp-r6-07052024.pdf>.

Please see the following clarifications regarding “Section E” of the attachment included in this request:

Regarding “Section E: SB 884 Activity,” PG&E anticipates submitting its SB 884 Electric Undergrounding Plan in 2025. Work forecast in the SB 884 Electric Undergrounding Plan will begin in 2027. Therefore, there are no forecast units and no forecast costs for SB 884 in 2023, 2024, or 2025.