

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

PG&E Data Request No.:	CalAdvocates_017-Q002		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_017-Q002_Redacted		
Request Date:	April 21, 2023	Requester DR No.:	CalAdvocates-PGE-2023WMP-17
Date Sent:	April 28, 2023	Requesting Party:	Public Advocates Office
DRU Index #:		Requester:	Matthew Taul

The following questions relate to your 2023-2025 WMP submission, Confidential response to Question 8 on “PGE-2023WMP-06\_VM\_inspection\_SH\_questions”, Confidential response to Question 16 on “PGE-2023WMP-09\_VM\_WTRM\_UG\_vs\_CC\_costs\_and\_RSE”, and Confidential response to Question 1 on “WMP-Discovery2022\_DR\_CalAdvocates\_035”.

**QUESTION 002**

Question 002 was deemed confidential by the California Public Advocates Office.

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**ANSWER 002**

We are selecting locations in 2022 and 2023 based on the Wildfire Feasibility Effectiveness (WFE) analysis, which leveraged WDRM V3 risk data, to prioritize for project selection. As part of the WFE analysis, for operational efficiency, individual Circuit Protection Zones (CPZs) were bundled together for project selection and design. Once bundled together with adjacent CPZs that are also identified for targeted undergrounding, the combined bundled WFE score is used to select projects. In that process, it is possible that an individual CPZ with a larger average risk profile, is combined with another adjacent CPZ within the 10-year undergrounding plan scope that may result in a lower combined WFE score that drives the bundled project to be lower than other projects that are selected for project development.

We believe this CPZ bundling approach is appropriate not only to improve field operational efficiency but also because bundling adjacent CPZs:

- Provides continuity with other projects to eliminate re-work, temporary facilities, and allows for a more complete design solution.
- Allows for nearer-term PSPS and EPSS benefits by bundling nearby segments together.

- Allows for more comprehensive customer and community engagement as opposed to multiple projects being developed and worked on separate timelines.

Lastly, our workplan as presented in the 2023 WMP was developed using numerous factors that could cause a particular circuit segment not to be included in this iteration of the 2023 WMP workplan including:

- 1) Due to the typically long timeframe required to develop and construct an underground project, 2022 WDRM V3 risk data via the WFE only minimally informed the early years in the 2023-2026 workplan, with much of the portfolio being informed by 2021 WDRM V2.
- 2) There continues to be carry over work from previous workplans that must be completed, if a project had been started in a prior period it will be worked to completion.
- 3) The WFE selection strategy utilizing WDRM V3 takes various cost and schedule optimization inputs into its selection methodology including:
  - Area saturation
  - Underground difficulty and long-term permitting risks
  - Circuit segment bundling
  - Resource readiness and availability
  - Previously hardened facilities
  - Private/customer owned facilities
- 4) Some projects have been selected due to Fire rebuild, PSPS mitigation or based on input from Public Safety Specialists.