

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2022
Data Response

PG&E Data Request No.:	CalAdvocates_010-Q07		
PG&E File Name:	WMP-Discovery2022_DR_CalAdvocates_010-Q07		
Request Date:	February 15, 2022	Requester DR No.:	CalAdvocates-PGE-2022WMP-10
Date Sent:	March 7, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

The following questions relate to your 2022 WMP Update submission. If a full response to a given question will be included in your WMP submission, your response to that question of this data request may consist of a citation to the specific page(s) or table(s) of the WMP where the information may be found, a written response to the question, or both.

QUESTION 07

Per PG&E's response to Data Request CalAdvocates-PGE-2022WMP-03, Question 1, PG&E installed approximately 109 circuit-miles of underground conductor in HFTDs in 2021.

- a) Please verify that the above number of circuit-miles is accurate.
- b) Noting that multiple circuits may sometimes run in parallel through the same right-of-way, how many miles of right-of-way did PG&E's 2021 undergrounding work affect in HFTDs?
- c) Among the miles of right-of-way undergrounded in HFTDs in 2021, how many miles of telecommunications did PG&E co-trench?
- d) Of the miles undergrounded in HFTDs in 2021, on how many miles of right-of-way did PG&E remove the poles?
- e) Of the miles undergrounded in HFTDs in 2021, on how many miles of right-of-way did PG&E top the poles?

ANSWER 07

- a) The data provided in PG&E's response to Data Request CalAdvocates-PGE-2022WMP-03, Question 1, indicates that 108.8 miles of underground circuit miles were installed and mapped in 2021 and is the most up-to-date information as of February 1, 2022 in PG&E's Geographic Information System (GIS). If additional 2021 projects have not yet been mapped, or mapping corrections need to be made, that number could change in the future. Please note, however, that this data includes ALL underground circuit-miles installed in 2021, including new assets installed underground as part of new business jobs, replacement of old underground circuits with new underground assets, and/or other projects that may not have related to the removal of existing overhead assets. Therefore, some portions of those miles are not relevant Questions 7c, 7d or 7e because they were not related to existing overhead electric distribution assets and poles.

- b) PG&E's primary unit of measure for all underground (and overhead) electric distribution assets is circuit miles. As a result, we do not have a systematic method to calculate the number of miles where multiple circuits are located parallel in the same trench. This measure of total trench distance (discussed in the question as "miles of right-of-way") is referred to internally as "trench miles" (e.g., where there is only one circuit in a trench, the "trench miles" equal "circuit miles"; where there are multiple circuits in a trench, the "circuit miles" exceed the "trench miles"). Because "trench miles" information is not systematically available, a manual job-by-job review and tally would be required to calculate the "trench miles" value that compares to the total circuit miles installed in 2021. PG&E objects to this request as overbroad and unduly burdensome.

In one limited case, we have already performed this manual review. As indicated in the 2022 WMP, we previously measured the mileage of undergrounding work recorded for the Butte Rebuild in trench miles. For that project, the breakdown of 2021 undergrounding work is as follows:

2021 Underground miles completed:	Circuit Miles	Trench Miles
Butte Rebuild	32.8*	24.9*

*For purposes of this request regarding total undergrounding numbers, these figures include a small volume of mileage from previously hardened overhead lines that were placed underground.

- c) As noted in the response to Question 7b, the primary unit of measure for all underground (and overhead) electric distribution assets is circuit miles. As a result, we do not have a systematic method to calculate the number of "trench miles" (discussed in this question as "miles of right-of-way") where our underground electric assets are co-located in a "joint trench" with other utilities. PG&E objects to this request as overbroad and unduly burdensome.
- d) As noted in the response to Question 7b, the primary unit of measure for all underground (and overhead) electric distribution assets is circuit miles. As a result, we do not have a systematic method to calculate the number of "trench miles" (discussed in this question as "miles of right-of-way") asked for in this request.

Further, we do not systematically track the status of the other utility's action in removing joint poles that will be eliminated as part of an undergrounding project. In addition, in the event a pole is topped because PG&E's electric facilities have been removed, the pole is no longer a PG&E asset and is no longer maintained in our GIS. The removal or topping of poles can also sometimes lag the completion of undergrounding asset installation by some period of time. Therefore, a resource-intensive, manual, job-by-job review and tally would be required to assess the number of poles that were removed or topped in connection with undergrounding projects in 2021. PG&E objects to this request as overbroad and unduly burdensome.

- e) See response to Question 7d. The requested information is not generally available from the datasets collected in relation to undergrounding projects. Further, as noted in the response to Question 7b, our primary unit of measure for all underground (and overhead) electric distribution assets is circuit miles. As a result, we do not have a systematic method to calculate the number of “trench miles” (discussed in this question as “miles of right-of-way”) asked for in this request. PG&E objects to this request as overbroad and unduly burdensome.