

October 1, 2026

Via Electronic Mail

Patrick Doherty, Program Manager
Office of Energy Infrastructure Safety
Performance Assurance Division
715 P Street, 20th Floor
Sacramento, CA 95814
Patrick.Doherty@energysafety.ca.gov

Re: 2024 Annual Performance Report - PG&E 2024 Wildfire Mitigation Plan

Dear Mr. Doherty:

Pacific Gas and Electric Company (PG&E) appreciates the effort of the Office of Energy Infrastructure Safety (Energy Safety) in developing the 2024 Annual Performance Report (APR) for PG&E's 2024 Wildfire Mitigation Plan (WMP) and respectfully submits the following comments.

1. Executive Summary

PG&E appreciates the effort by Energy Safety in preparing the *2024 APR* as part of an annual performance evaluation and comprehensive look at the implementation of PG&E's 2024 WMP and its catastrophic wildfire risk reduction initiatives. In its report, Energy Safety determined that PG&E attained 54 of 56 assessed initiatives. PG&E recognizes the importance of the *2024 APR* and the observations regarding evidence sufficiency, reporting consistency, field verification, Quality Assurance and Quality Control (QA/QC) methodology, and risk-driver transparency.

We continue to implement corrective actions and advance the Areas of Continued Improvement (ACI) for its 2026-2028 WMP. The *2025 Independent Evaluator Annual Implementation Report (IE AIR)*, dated July 1, 2026, provided an independent third-party assessment of our 2025 WMP performance. The *2025 IE AIR* validated 54 of 55 initiatives, found no workmanship issues in sampled construction activities, and recognized maturity of our QA/QC governance.

We recognize that the independent evaluation of its 2025 performance alone does not resolve the *2024 APR* observations concerning missed risk-reduction targets and ACIs. This response addresses those *2024 APR* observations. In Section 2 below, we address the *2024 APR* observed missed risk-reduction targets. In Section 3, we address the *2024 APR* observed opportunities and issues raised.

2. 2024 WMP Missed Risk -Reduction Targets

The missed targets on risk reduction below were identified in the Energy Safety 2024 APR.

a. System Hardening Transmission Splice - 8.1.2.5.1

Energy Safety stated the following:

“Based on Energy Safety’s field observations, PG&E did not meet its target for the 2024 WMP initiative related to Transmission Shunt Splices (GH-06). PG&E reported installation of 23 shunt splices against a 2024 WMP target of 22. However, Energy Safety’s field inspections of PG&E’s 2024 shunt splice work determined that there were four shunt splice locations where work was not sufficiently completed, and one shunt splice location where PG&E reported inaccurate data. As noted previously, PG&E agreed with these findings in three of those instances and disagreed with two of them. Regardless, PG&E and Energy Safety agree that three of the field observations of incomplete or inaccurately reported work are valid. This reduces PG&E’s actual completion by three to 20, which is lower than the 2024 WMP target of 22 completed transmission shunt splices.”¹

“While neither the 2024 WMP nor the EC ARC quantified the expected risk reduction from PG&E’s missed initiative target related to transmission shunt splice installation, the narrative description of the initiative in the 2024 WMP makes clear that there was some expected risk reduction that would result from the transmission shunt splice work. By not meeting the target for that initiative, PG&E did not achieve as much risk reduction as planned. Therefore, this report concludes that one of PG&E’s missed 2024 WMP targets led to less risk reduction than PG&E committed to its customers and the broader public in its 2024 WMP.”²

Response:

We acknowledge the importance of alignment among reported completion, supporting records, and field-observed conditions. For 2025, we reported completion of shunt-splice installations on 25 transmission lines. Our 2025 IE AIR validated 14 of 15 planned lines and 62 shunt-splice locations, resulting in a 93 percent validation rate and high confidence in completion; the rate was below the Independent Evaluator threshold because access limitations prevented completion of the planned sample. We are evaluating the 2024 field-verification results and the applicable completion and verification controls to determine the appropriate finding-specific position and any additional actions.

We respectfully disagree with the 2024 APR observation that the 2024 target for GH-06 was not met. As specified in our 2023-2025 WMP³, *Revised Table 8-3: Grid Design, Operation, and Maintenance Targets by Year*, the 2024 GH-06 target was the installation of shunt splices on 22 Electric Transmission Lines (ETLs). We maintain that shunt splice installations were

¹ 2024 APR (September 17, 2026) at 17-18.

² *Id.* at 21.

³ 2023-2025 Wildfire Mitigation Plan R4 (January 8, 2024) on page 378.

completed on 22 ETLs, thereby achieving the 2024 GH-06 target. *Table 1* below summarizes the 22 ETLs where shunt splices were installed in 2024.

Table 1: 2024 GH-06 Electric Transmission Lines (ETL) Shunt Splices

T Line Count	Electric Transmission Line (ETL)	Line Description	Asset ID Count (Towers)⁴	Shunt Splice Count on Reported Asset ID(s)
1	ETL.3960	TEMBLOR-SAN LUIS OBISPO	1	4
2	ETL.6500	COLGATE-PALERMO 60kV	5	10
3	ETL.6520	COLGATE-SMARTVILLE #2	6	12
4	ETL.7270	KESWICK-TRINITY	31	99
5	ETL.8440	ARCO-CHOLAME	9	15
6	ETL.8960	LOS BANOS-PACHECO	15	36
7	ETL.8961	DINOSAUR POINT TAP	3	5
8	ETL.4220	WOODLEAF-PALERMO	7	22
9	ETL.5410	CARBERRY SW STA-ROUND MTN	12	23
10	ETL.6320	CENTERVILLE-TABLE MTN	4	8
11	ETL.7060	HILLSDALE JCT-HALF MOON BAY	2	10
12	ETL.7140	IGNACIO-BOLINAS #1	9	25
13	ETL.7212	SNEATH LANE-HALF MOON BAY	7	29
14	ETL.7575	SNEATH LANE-PACIFICA	5	17
15	ETL.8300	VOLTA-SOUTH	12	29
16	ETL.6852	CLEAR LAKE-KONOCTI	6	16
17	ETL.6921	ELK CREEK TAP	16	47
18	ETL.7030	HAT CREEK #1-WESTWOOD	5	8
19	ETL.7560	WEIMAR #1	8	25
20	ETL.7810	POTTER VALLEY-MENDOCINO	3	13
21	ETL.7820	POTTER VALLEY-WILLITS	6	13
22	ETL.8180	TULUCAY-NAPA #1	4	11

⁴ These are the asset ID counts provided in our 2024 reports. For the latest information and corrections submitted to Energy Safety regarding location information for GH-06 (Shunt Splices), please refer to “2026 Q1 Spatial QDR Revisions,” submitted on May 1, 2026. Please reference Revision 2 in our submission. Details include: 2024 & 2025 datasets for System Hardening – Transmission Shunt Splices [GH-06] underwent a thorough review and reconciliation against construction As-Built drawings. This corrective action resulted in the removal of errant, over-reported records initially included due to source system inaccuracies – as well as the addition of records where applicable. We resubmitted impacted tabular and GIS data feature classes and tables in its entirety (3.6.3.2 Grid Hardening Point feature class).

We agree with the 2024 APR field observations identifying inaccurately reported shunt splice installations at three individual locations. Specifically, NOV IDs *CAD_PGE_CYA_20250325_1149* and *CAD_PGE_CYA_20250325_1318* correspond to two reported shunt splice locations on the Hat Creek ETL where no shunt splices were present.

However, the absence of shunt splices at those specific locations does not indicate that the Hat Creek ETL lacked qualifying shunt splice installations. Shunt splices were installed on the Hat Creek line and remained in place. Accordingly, while certain reported installation locations were inaccurate, the Hat Creek line satisfies the requirements of the GH-06 initiative and should be recognized as a completed line.

The third NOV referenced in the 2024 APR, NOV ID *CAD_PGE_CYA_20250827_1038*, relates to an ETL that was not part of the 22 ETL population used to measure GH-06 completion. Consequently, the observation has no bearing on GH-06 performance results and should not impact the determination as to whether the 2024 GH-06 target was met.

Based upon the information in the table above, we respectfully request that Energy Safety reconsider its determination regarding GH-06 Electric Transmission Shunt Splices as a missed initiative.

b. Wood & Slash Management - 8.2.3.2

Energy Safety stated the following:

“PG&E did not provide documentation to support that debris generated by its vegetation management activities was managed as described in its 2023-2025 WMP.”⁵

Response:

As noted in the PG&E 2024 WMP Vegetation Management Audit Corrective Action Plan, Vegetation Management (VM) does not currently track the management of vegetative material less than 4 inches in diameter. Under our VM process, crews must perform all required debris treatment as a condition of work completion, and our vendor agreements explicitly incorporate this requirement.

Since that response was provided, as of the end of 2025, we have incorporated wood debris management verification into the quality observations performed by our VM Quality Control team.

VM Quality Control planned and implemented a Post Tree Work Assessment (PTWA) program that evaluated adherence to best management practices for slash and debris generated from Distribution Routine tree work. The assessment was conducted from November 2025 through February 2026 and comprised a total of 7,109 field assessments of spans with a completed tree work date after August 1, 2025. The 7,109 spans assessed were a representative sample of Tree Crew vendors operating in each VM region. We used the

⁵ *Id.* at 19.

mobile GIS applications, *Survey123* and *Field Maps*, as the primary tools to support and document the field assessments.

VM Operations leadership team members were notified prior to implementation of the assessment and informed of the scope and purpose. Results were published to a PowerBI report that was accessible to VM Operations stakeholders. In addition, observations and results from the assessment were discussed in Quality Learning Forums with VM Operations team members.

Additionally, as part of our response to the 2025 VM Audit, we stated that PG&E would begin development of an enhancement to OneVM to capture how debris was treated (e.g., lopping, chipping, or removal). We currently anticipate this field will be added by Q1 2027, which will allow VM to track debris management activities within OneVM platform.

Currently, as of Q3 2026, PG&E approved a Business Requirements Document (BRD), titled “Debris Management Tracking Dropdown (OneVM),” we developed in response to Energy Safety feedback on our Wood and Slash Management practices. The BRD proposes adding a required field in OneVM to capture how debris generated from vegetation work is treated (e.g. lopped, chipped and scattered, chipped and removed from property). The targeted implementation timeline for this enhancement is Q1 2027.

3. Opportunities or Issues Raised in the APR

The 2024 APR also identified the following issues below but did not rise to the level of non-compliance. Although these issues do not constitute compliance deficiencies, we address them as opportunities for continuous improvement.

a. 2024 WMP Expenditure Assessment

Energy Safety stated the following:

“Energy Safety analyzed PG&E’s expenditures on individual 2024 WMP wildfire mitigation initiatives and found that 16% (nine out of 56) of the initiatives had actual expenditures that deviated more than 10% from those proposed. Energy Safety also found that PG&E exceeded its proposed expenditures for 2024 WMP activities by 8%. See the table in Appendix A for a complete list of initiatives and their proposed and actual expenditures.”⁶

Response:

We acknowledge Energy Safety’s observations on expenditures, and we appreciate Energy Safety’s review of WMP expenditures to assess per AB 1054 whether PG&E failed to fund wildfire mitigation activities included in its WMP. PG&E is pleased that Energy Safety’s review confirms that PG&E did not fail to fund WMP activities. PG&E notes that actual expenditures do vary based on multiple factors. We submit a detailed variance explanation to

⁶ *Id.* at 22.

Energy Safety for any WMP wildfire initiative that has a variance of +/- 10% to the budgeted amount. This information was provided to Energy Safety as part of the ARC Financial Table.

Energy Safety stated the following:

“PG&E submitted a second revised EC ARC (EC ARC R2) on July 8, 2026, along with a revised cover letter and a revised financial reporting attachment. The cover letter noted that PG&E had discovered “potential discrepancies between previously filed WMP financials and current SAP totals for the 2023-2025 period.” Due to the timing of the latest EC ARC revision, and the proximity to the drafting and publication of this APR, the data from the second revision was not used in this report.”⁷

Response:

We acknowledge 2024 APR observation regarding potential discrepancies between previously reported WMP financial information and current System Application (SAP) totals for portions of the 2023-2025 reporting period. Following the 2024 AIR, we performed a comprehensive review of the underlying financial data and allocation methodologies and engaged a third-party contractor to assist in reviewing the data, business processes, and reporting controls supporting WMP financial reporting. This review identified opportunities to strengthen data governance, improve consistency between source system records and reported results, and further enhance transparency into WMP spending.

In response, we have implemented, and continue to implement, process improvements to enhance the accuracy, repeatability, and traceability of WMP financial reporting.

Enhanced Automated WMP SAP Mapping Logic

We are implementing a standardized SAP mapping framework that automates assignment of work activities to specific WMP initiatives using defined SAP attributes, including Major Work Category (MWC), Maintenance Activity Type (MAT), Management Report Item (MRI), and Funding Identification (ID). This enhanced mapping logic reduces reliance on manual intervention and judgment-based allocations while providing a consistent methodology for assigning costs to approved WMP initiatives.

Formal WMP Dashboard Certification Process

To strengthen financial reporting controls, we have established a formal certification process for the WMP financial dashboard used to support regulatory reporting. Under this process, financial results are reviewed and certified by designated business, finance, and data governance stakeholders. This process provides an additional layer of governance before financial information is incorporated into regulatory submissions.

Independent Third-Party Validation Reviews

⁷ *Id.* at 7.

Building upon the review work completed with a third-party contractor, we are evaluating ongoing periodic third-party reviews of WMP financial reporting processes, data governance controls, and SAP mapping methodologies. These independent assessments would serve as an additional validation mechanism to identify emerging risks, assess effectiveness of reporting controls, and provide recommendations for continuous improvement. Periodic external review enhances transparency and provides increased confidence in the accuracy and reliability of reported WMP financial information.

Expanded Visibility and Monitoring of WMP Spend

We have enhanced dashboard capabilities to provide greater visibility into WMP-related spending and cost allocation trends. The improved reporting environment allows stakeholders to view financial performance at a more granular level, monitor expenditures against approved WMP initiatives, and identify anomalies or potential mapping issues earlier in the reporting cycle. Increased visibility supports timely corrective action and helps ensure consistency between operational data, financial reporting, and regulatory filings.

Collectively, these enhancements strengthen our financial reporting control environment by improving data accuracy, increasing transparency, reducing manual processing, and establishing additional governance checkpoints over WMP financial reporting. We believe these improvements will help mitigate the risk of future reporting discrepancies and support more reliable and consistent reporting of WMP expenditures in future regulatory submissions.

As part of its continuous improvement efforts, we will continue to evaluate and refine its WMP financial reporting processes, leveraging lessons learned from prior reporting cycles, input from independent reviewers, and advancements in data governance capabilities. These actions are intended to further strengthen reporting accuracy, enhance stakeholder confidence, and ensure that WMP financial information remains transparent, traceable, and aligned with underlying SAP source data.

b. 2024 Comparison of Spatial and Tabular QDR Data

Energy Safety stated the following:

“Energy Safety assessed the data submitted by PG&E regarding the WMP work it completed in 2024, in both the spatial and tabular QDR submissions. Energy Safety found the following inconsistencies between spatial and tabular QDR submissions for 24 initiatives, which may call into question PG&E’s data reporting practices and initiative attainment (Table 5). Additionally, Energy Safety identified deviations in PG&E’s reporting of ignition and wire down events (Table 6).”⁸

Response:

While Energy Safety identified inconsistencies between reporting sources, our detailed review found that several of the variances cited in *Table 5* of the 2024 APR could not be

⁸ *Id.* at 48.

independently reproduced using our previously submitted spatial data, tabular data, Annual Report on Compliance filings, or underlying source records. In multiple cases, we were unable to determine the source population, calculation methodology, or reporting logic used to derive the values in *Table 5*. As a result, we cannot fully validate several of the reported discrepancies without additional information regarding Energy Safety's analytical approach and source data selection. Specifically, Section 10.4 identifies inconsistencies across 24 initiatives and notes that the reported variances may call into question our reporting practices. However, we were unable to replicate several of the reported values, suggesting that at least some of the identified variances may stem from differences in analytical methodologies, data sources, or reporting conventions rather than errors in our reporting.

For example, for initiatives VM-04, VM-07, and GM-06, PG&E was unable to determine how the values reflected in the *Table 5* were derived, as the reported differences could not be traced to a specific source population, calculation methodology, reporting logic, or data extract utilized in the APR analysis.

For GH-09 and GH-10, our review indicates that revised data submissions may not have been incorporated into the values ultimately reflected in *Table 5*.

For VM-16, VM-17, AI-06, GH-01 System Hardening Distribution, and GH-04 10K Undergrounding, we identified discrepancies between the values submitted through the Spatial QDR process and the values displayed in *Table 5*. We would appreciate learning more about the source and method used to derive the values Energy Safety reported in *Table 5*.

Additionally, the Covered Conductor target listed in *Table 5* is not accurate, as there are no specific targets for Covered Conductor as a standalone initiative in the 2023-2025 WMP. The targets are available in the 2023-2025 WMP⁹ in *Revised Table 8-3: Grid Design, Operation, and Maintenance Targets by Year* (page 381). In this table, the 2024 Target and Unit is listed as "Complete 280 circuit miles of system hardening work which includes overhead system hardening, undergrounding, and removal of overhead lines... []." The cited Covered Conductor target appears to have been sourced from the *Updated Table PG&E-8.1.2-1: Overall System Hardening Mileage Forecast* (page 402), where we reported 60 Estimated Overhead Covered Conductor Miles in 2024. Those 60 miles were an estimate at the time and represent only a subset that contributed to the overall GH-01 target of 280 miles.

For the metrics reflected in *Table 6* of the 2024 APR, we identified discrepancies between the values presented in the 2024 APR and our submitted reporting data. For 2024 Total Ignitions, our tabular and spatial submissions were fully aligned, with both reporting 563 ignitions. For 2024 Total Wire Down Events, our tabular and spatial submissions reflected a variance of less than 0.2 percent (4,627 and 4,619 events, respectively). Given the high degree of alignment between our submitted reporting sources, we were unable to determine how the values reflected in *Table 6* of the 2024 APR were derived or whether different source datasets, reporting extracts, calculation methodologies, or business rules were utilized in Energy Safety's analysis.

⁹ 2023-2025 WMP R8 (February 13, 2025).

To facilitate a complete reconciliation of these observations, we respectfully request additional detail regarding the methodology used to develop the *Table 5* values, including:

- The specific source datasets utilized.
- The reporting extracts and report versions used in the analysis.
- Any applied business rules, filtering criteria, aggregation logic, or data transformations.
- The timing of data pulls relative to any revised submissions.

We also note that, since 2024, we have continued to invest in improving the consistency, traceability, and governance of wildfire mitigation reporting data. These efforts include the implementation of standardized reporting controls and the development of the Wildfire Reporting Environment (WiRE), a centralized platform designed to serve as an authoritative source for wildfire mitigation reporting data and improve alignment across regulatory reporting submissions. While we remain committed to further enhancing its reporting processes, these investments represent significant progress toward strengthening data quality, transparency, auditability, and consistency across wildfire mitigation reporting.

We remain committed to ensuring the accuracy, completeness, and consistency of its wildfire mitigation reporting and welcomes the opportunity to work collaboratively with Energy Safety to reconcile any remaining differences and improve transparency regarding data lineage and reporting methodology.

c. 2024 Data Reporting Accuracy and Completeness Performance

Energy Safety stated the following:

“PG&E’s reporting accuracy and completeness requires improvement, as has been recommended in previous annual reports on PG&E’s performance. Energy Safety identified important errors in the accuracy of work completion and accounting for some 2024 WMP initiatives, and there were numerous inconsistencies in the spatial and non-spatial reporting on WMP-related work. Similar observations of PG&E’s poor data quality were communicated in prior Energy Safety Annual Reports on Compliance, and in the VMA Report for the 2024 WMP.

Additionally, with respect to the reported drivers of unplanned outage events the upward trajectory of the “other” category represents a material data quality and risk transparency concern. Further, approximately 96% of “other” category outage events were further classified under “other” or “unknown” subcategories — limiting the ability to fully characterize and assess outage risk across PG&E’s service territory.

Given the ongoing issues with PG&E’s data reporting accuracy and completeness, this APR reiterates Energy Safety’s previous expectation that PG&E improve its data collection and reporting practices. Future performance reporting will continue to focus on this issue to ensure that PG&E improves.”¹⁰

¹⁰ *Id.* at 55.

Response:

We appreciate the opportunity to provide additional context regarding Figure 9, “PG&E Outage Event Delineated by Risk Drivers,” including the interpretation of historical trends and the use of the “Unknown” and “Other – See Comment” Basic Cause categories.

Historical Comparability of Outage Data

Figure 9 depicts outage data from 2017 through 2024. We are unable to determine the source data and methodology used to construct the figure, particularly for the 2017–2020 period. This is important because Energy Safety’s Data Guidelines requiring submission of Unplanned Outage data were not established until late 2020, at which point the reporting requirement reflected only a limited retrospective period of a quarter.

Accordingly, data preceding implementation of the Data Guidelines may not have been developed using the same reporting definitions, methodology, schema, or categorical domain values subsequently prescribed by Energy Safety. Comparisons across these periods should therefore be made with caution. Apparent changes in the number or distribution of cause designations may reflect differences in reporting methodology and available categories rather than changes in underlying outage characteristics.

Since implementation of Energy Safety’s reporting schema in late 2020, we have used the domain values prescribed by Energy Safety to report outage events in its quarterly Wildfire Mitigation Plan (WMP) data submissions.

Quarterly Reporting Represents a Snapshot in Time

Our quarterly submissions necessarily represent a snapshot of outage information available at the time each report is produced. Because Energy Safety requires the quarterly data be submitted shortly after quarter close, investigation, validation, and quality assurance/quality control (QA/QC) activities may still be underway for a substantial number of outage events.

We have more than 10,000 outage records and associated event attributes requiring review each quarter. Certain outage characteristics, particularly cause determinations, regularly require additional investigation and cross-functional review before they can be confirmed.

For example, an outage record may initially contain information suggesting Vegetation as a cause. Confirmation of Vegetation as the cause may require subsequent review by vegetation management subject-matter experts. Until that review is completed, reporting “Vegetation” as a confirmed Basic Cause could overstate information available at the reporting deadline. In such circumstances, we may appropriately report “Unknown” until the investigation is sufficiently complete and the determination is reflected in the source system.

Outage information therefore may continue to mature after the quarterly submission deadline as investigations and QA/QC activities are completed. We endeavor to provide updated information through subsequent submissions; however, each submission remains a representation of the information available at a particular point in time.

This timing is particularly relevant because the current reporting schema generally requires selection of a Basic Cause without distinguishing between a preliminary or suspected cause and a confirmed cause.

Interpretation of Figure 9

We are also unable to reproduce Figure 9 using the quarterly data submitted to Energy Safety and therefore cannot confirm the methodology Energy Safety used to develop the figure.

In particular, it is unclear how the category labeled “Other” in Figure 9 was derived. We assume that Energy Safety’s reference to “Cause” corresponds to the BasicCause field and that “Subcategories” corresponds to the BasicCauseComment field; however, the “Other” category shown in the figure does not appear to correspond directly to the prescribed “Other – See Comment” domain value.

“Other – See Comment” represents approximately 4% of our submitted data. Based on the figure, it appears possible that Energy Safety’s “Other” category aggregates multiple Basic Cause values other than Vegetation, Equipment Failure, and Object Contact. For example, the category may include values such as Contamination, Dig-In, Fire, Lightning, Vandalism/Theft, or other prescribed Basic Cause values.

If Figure 9 aggregates these distinct categories into a single “Other” grouping, that methodology should be clearly identified because it materially affects interpretation of the trend. Such an aggregation should also be distinguished from our actual use of the prescribed “Other – See Comment” value.

Specifically, our submitted data shows that the individual “Unknown” category decreased from 2023 to 2024. Accordingly, characterizing our submissions as demonstrating an increase in the use “Unknown” would not accurately describe the year-over-year movement of individual reported categories. If Energy Safety is instead referring to an independently constructed aggregation of multiple cause categories, we recommend that the methodology and component categories underlying that aggregation be expressly identified.

Use of “Other – See Comment” and “Unknown”

Both “Other – See Comment” and “Unknown” are valid categorical options provided within Energy Safety’s reporting schema.

We use “Other – See Comment” when the known or best-supported cause of an outage is not adequately represented by another available Basic Cause domain value. The associated comment provides additional specificity regarding the cause. Examples may include customer equipment caused, operating error, coordination failure, and other causes for which a more specific prescribed Basic Cause option is unavailable.

Similarly, we use “Unknown” when the available information at the reporting deadline does not support a sufficiently reliable cause determination. This approach avoids reporting a

preliminary or unconfirmed cause as though it were established.

Accordingly, use of these categories should be understood within the context of the reporting schema, the timing of quarterly submissions, and the maturity of the underlying outage investigation at the time of reporting.

Recommended Data Guideline Enhancements

We reiterate our recommendation, which has also received support from other electrical corporations, that Energy Safety consider revising its Data Guidelines to better account for the evolving nature of outage-event data.

One approach would be to allow quarterly Risk Event feature datasets, including Unplanned Outages, to be submitted on a cumulative year-to-date basis. This would allow each successive quarterly submission to incorporate completed investigations and QA/QC updates from prior quarters, providing Energy Safety with progressively more complete and accurate annual data while reducing the need for repeated resubmissions of individual historical datasets.

Alternatively, Energy Safety could establish an annual true-up process for Risk Event datasets, allowing electrical corporations to provide a finalized annual dataset after sufficient time has elapsed to complete investigations and associated QA/QC activities.

We also recommend revising the “Basic Cause” field to “Suspected Cause,” or otherwise establishing a mechanism to distinguish preliminary cause determinations from confirmed causes. Such a distinction would allow electrical corporations to provide the best information available at the quarterly reporting deadline without implying a level of certainty that may not yet be supported by the underlying investigation.

These modifications would improve transparency regarding data maturity, enhance comparability across reporting periods, reduce unnecessary resubmissions, and provide Energy Safety with a more accurate representation of outage causes as investigations are completed. We appreciate our ongoing partnership with Energy Safety and remain committed to continuously improving our reporting to maximize the value in measuring risk, enhancing transparency, and supporting regulatory compliance. We also recognize opportunities to further improve outage data quality and accuracy, including continuing efforts to reduce the volume of “Unknown” cause designations through enhanced data collection, analysis, and reporting practices.

d. PG&E’s Initiatives Related to QA/QC of Asset Inspections

Energy Safety stated the following:

“On July 23, 2026, Energy Safety published an audit of PG&E’s implementation of its 2024 WMP initiatives related to its QA/QC programs for asset inspections. Overall, the audit found that PG&E demonstrated QA and QC program frameworks consistent with its WMP commitments and successfully executed its 2024 QA/QC initiatives. However, the audit made several observations and recommendations regarding these programs, including:

- *While there were high reported pass rates by PG&E, in some cases a substantial volume of inspection findings (e.g., maintenance issues that would have required correction within six months in some high-risk areas of PG&E's territory) were excluded from the pass rate calculations, calling into question whether the pass rate truly reflected the number of inspections sampled that should have passed QA/QC.*
- *In tallying up audits to count toward achieving its objective number of audits, PG&E included audits where the full scope could not be performed.*
- *There were inconsistencies between PG&E's reported metrics and supporting datasets.*
- *Distribution audit failure criteria were not clearly documented by PG&E, which limits transparency and may obscure inconsistencies in how audit outcomes are determined.*

The audit noted that while PG&E demonstrated QA and QC program frameworks consistent with its 2024 WMP commitments, continued refinement of audit methodologies and reporting controls would further enhance visibility into the risks present on PG&E's system and indicate areas where asset inspection practices might be improved.”¹¹

Response:

We appreciate Energy Safety's recognition of the maturity of our QA/QC framework. The 2025 IE AIR validated our asset and vegetation QA/QC initiatives and rated all five assessed maturity dimensions at Level 3, Routine. We also recognize the 2024 APR's more specific concerns regarding calculation rules, incomplete audits, supporting data, and program documentation and have taken these concerns into account in the 2025 and 2026 iterations of the program.

4. Conclusion

We substantially implemented our 2024 WMP, and the subsequent independent evaluation validated the strength of our 2025 execution and QA/QC governance. We remain committed to continuous improvement and will continue enhancing the accuracy, traceability, reconciliation, field verification, and evidentiary support underlying our wildfire mitigation initiatives. We will continue implementing our approved 2026-2028 WMP and associated corrective actions to further strengthen program performance and reporting.

Based upon the information Table 1: 2024 GH-06 Electric Transmission Lines (ETL) Shunt Splices, we respectfully request that Energy Safety reconsider its determination regarding GH-06 Electric Transmission Shunt Splices as a missed initiative.

We appreciate Energy Safety's comprehensive evaluation of our implementation of the 2024 WMP and its wildfire risk reduction initiatives. We value the observations and recommendations provided and will continue to incorporate these insights into our ongoing improvement efforts. We look forward to continued collaboration with Energy Safety in

¹¹ *Id* at 22.

October 1, 2026

Page 14

supporting our shared objective of reducing wildfire risk and protecting the communities we serve.

Very truly yours,

/s/ Daniel Kushner

Daniel Kushner, PhD