

INDEPENDENT EVALUATOR

Annual Implementation Report for Wildfire Mitigation Plan Implementation Year 2025

July 01, 2026



*Pacific Gas and
Electric Company®*



BUREAU
VERITAS

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DISCLAIMER

This report has been compiled through the process of observation and review of documents provided by the Electrical Corporation named herein. The Office of Energy Infrastructure Safety (“Energy Safety”) instituted the requirement for an independent evaluation of Electric Corporation’s Wildfire Mitigation Plans (“WMP”). Bureau Veritas is not the designer, implementer, or owner of the WMP and is not responsible for its content, implementation and/or any liabilities, obligations or responsibilities arising therefrom.

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1. EXECUTIVE SUMMARY

Background

The devastating wildfires of the past and present have taught us valuable lessons about safeguarding California's lands, particularly in areas where electrical infrastructure coexists with wildland environments. In response to these challenges, the California Public Utilities Commission (CPUC) initiated Rulemaking 18-10-007 to provide guidance on Wildfire Mitigation Plans (WMPs) for Investor-Owned Utilities (IOUs), now referred to as Electrical Corporations (ECs). These WMPs are designed to cover a three-year period, with the first cycle of independent evaluations beginning in 2020.

The 2025 WMP is part of the second three-year planning cycle set forth by Energy Safety. Pacific Gas and Electric Company (PG&E) continues to build on the previous WMP cycle by incorporating enhanced community engagement efforts, utilizing review and analysis to strengthen existing mitigation measures, and applying innovative technologies. These improvements, combined with existing mitigation measures, are founded on the understanding that effective natural resource management is crucial for maintaining facilities. During the first evaluation of this cycle, which ended in 2023, PG&E reported a decrease in wildfire ignition risk. In 2024, PG&E achieved a reduction in reportable ignitions within the High Fire Threat Districts (HFTD) and High Fire Risk Areas (HFRA) of their service territory. For implementation year 2025, PG&E continued the reduction trend for reportable ignitions with a total of 57, the fewest ignitions in HFTD compared to all other years on record. Across all five WMP categories, PG&E met or exceeded the targets outlined in the WMP.

This Independent Evaluator (IE) Annual Implementation Report (AIR) assesses PG&E's WMP commitments for implementation year 2025. The IE AIR reviews the WMP initiatives as outlined for 2025 and evaluates PG&E's performance in meeting their committed objective targets, verification of QA/QC program implementation, processes, and results, as well as the distribution of funding to mitigation efforts described within the WMP.

Pursuant to Public Utilities Code Section 8386.3(c)(2)(B)(i), (ii), (iii), and (iv), Bureau Veritas North America, Inc. (BVNA), in partnership with Lamar Technical Services, LLC., has been selected as the IE to review and assess PG&E's 2025 WMP in its entirety. This IE AIR will present BVNA's findings and results for review. BVNA was included in the Office of Energy Infrastructure and Safety (Energy Safety) Independent Evaluator List for 2025 WMPs, dated December 18, 2025, in accordance with Public Utilities Code section 8386.3(c)(2)(A).

In compliance with Energy Safety's requirements, PG&E has contracted BVNA to provide the IE assessment. This assessment includes the IE responsibilities outlined in Public Utilities Code section 8386.3(c)(5)(C), which involve performing the following tasks:

- Task 1: Consult with Energy Safety on implementation assurance auditing that will be performed
- Task 2: Perform implementation assurance auditing, including field inspections
- Task 3: Draft and provide Energy Safety a report on audit findings, including deficiencies of underfunded WMP activities

- Task 4: Draft and provide Energy Safety a report on deficiencies of electrical corporations
- Task 5: Track and report deficiencies of audit findings

The evaluation process began with an Energy Safety kick-off meeting, which served as an introduction between PG&E representatives, BVNA staff, and assigned Energy Safety personnel. This introductory meeting established key elements, including communication and documentation protocols, as well as the identification of individuals responsible for receiving requests from the IE. Following this meeting, the IE initiated a review of PG&E's 2025 WMP and related publicly available documents, as listed in Section 7. This review aimed to identify PG&E's stated goals within the 2025 WMP.

To evaluate activities described in the WMP that were not available in public records, BVNA's team of evaluators submitted data requests and conducted interviews with Subject Matter Experts (SMEs). These steps helped verify activities stated within the 2023-2025 WMP (see Section 7 for a list of Data Requests/SME Interviews). Detailed analysis and key findings for each respective category are presented in the following sections of this report.

The IE has classified each activity as "Validated," "Not Validated", or "Not Applicable." "Validated" indicates that the EC has clearly demonstrated meeting the stated WMP target for the review year or continues to implement the activity as outlined. "Not Validated" means the EC either failed to provide sufficient documentation to support their claim of implementation or did not meet the WMP target. The individual reviews will elaborate and make the distinction. "Not Applicable" signifies that the EC has determined the activity is not relevant to the current review period.

BVNA's understanding of collected utility strategies demonstrated throughout the state is summarized below:

1. **Inspection and maintenance of distribution, transmission, and substation** includes a comprehensive approach conducting system patrols and ground inspections using advanced technological tools, managing predictive and electrical preventative maintenance, performing vegetation inspections and management, implementing vulnerability detection methods such as Light Detection and Ranging (LiDAR) inspection, and utilizing geospatial and topography identification along with geographic information system (GIS) mapping data. A key aspect of these programs is the identification and collection of data elements through each initiative. Understanding how this data is used and shared is essential for improving utility practices and enhancing overall wildfire mitigation efforts.
2. **System hardening** includes pole replacement, non-expulsion equipment, advanced fuses, tree attachment removal, less flammable transformer oil, covered wire and wire wrap, and undergrounding where it is supported by a cost benefit analysis.
3. **De-energization** actions are triggered and prioritized based on various fire weather conditions such as forecasted, imminent, and validated extreme fire weather conditions. Plans for re-energization when weather conditions subside to safe levels are implemented.

Both manual and automatic capabilities to implement the de-energization and re-energization process exist.

4. **Advanced Technologies** include Distribution Fault Anticipation (DFA) technology, tree growth regulators, pulse control fault interrupters, oblique and hyperspectral imagery, advanced transformer fluids, advanced LiDAR systems, and advanced Supervisory Control and Data Acquisition (SCADA) systems. These technologies help reduce risk of electrical ignition, mitigate power outages, and prevent equipment damage.
5. **Vegetation management**, including routine preventative vegetation maintenance; corrective vegetative management and off-cycle tree work; emergency vegetation clearance, prioritized for portions of the service territory in Tier 2 and 3 HFTD; quality control processes; and resource protection plan, including animal and avian mitigation programs. Enhanced Vegetation Management (EVM) with enhanced inspections, aims to keep all aspects of trees away from power lines and to prescribe minimum clearances that exceed state standards. EVM conducts supplementary inspections in addition to standard patrol routines to identify and address dead, diseased, or declining trees near power lines, ensuring they are removed or managed before they pose a risk to electrical infrastructure.
6. **Situational Awareness** involves gathering real-time information from various sources to create a comprehensive understanding of current conditions. This includes data from devices and sensors on electrical systems, weather monitoring equipment, and other tools that assess wildfire conductivity conditions. Utilization of programs such as online feeds and websites like the National Fire Danger Rating System (NFDRS) help the EC employ risk-informed, data-supported decision-making processes. The goal of these situational awareness efforts is to achieve a shared understanding of actual conditions amongst all stakeholders, thereby improving collaborative planning and decision-making.
7. **Emergency Preparedness, Outreach, and Response** efforts engage a wide range of key stakeholders, including critical facilities, customers, local government, and essential agencies such as CAL FIRE. Strong communication channels are employed with local law enforcement agencies, first responders, hospitals, local emergency planning committees, other utility providers, and the California Independent System Operator. Coordination agreements such as mutual Aid or Assistance, as well as a community outreach plan is in place to inform and engage the various stakeholders.
8. **Operational practices** include communication protocols, and the execution of specific plans designed to minimize fire danger. A key element of this approach is the strategic deactivation of automatic reclosers during high-risk periods. De-energization decisions are based on a multifaceted risk assessment that consider various factors, including the type of facility, tree and vegetation density, the presence of available dry fuel, and other location specific vulnerabilities to wildfire risk.

Introduction to Pacific Gas & Electric

PG&E was incorporated in California in 1905, becoming one of the largest natural gas and electricity providers in the United States. As a subsidiary of PG&E Corporation, this EC employs approximately 23,000 people and maintains a corporate office in Oakland, California.

PG&E's service area spans approximately 71,732 square miles in northern and central California, extending from Eureka in the north to Bakersfield in the south, and from the Pacific Ocean in the west to the Sierra Nevadas in the east. The EC serves more than 5.5 million customers across their entire service area.

PG&E's extensive infrastructure includes approximately 108,060 circuit miles of both overhead and underground electric distribution lines and 18,293 circuit miles of interconnected overhead and underground transmission lines. The company also manages 992 substations and 1,433 weather stations. Approximately 26% of PG&E's service territory, comprising 27,846 miles of distribution assets (OH & UG) and 5,518 miles of electric transmission (OH & UG), lies within the High Fire Threat District (HFTD) and High Fire Risk Area (HFRA). In recent years, PG&E has developed an integrated strategy to manage and reduce ignition risks in wildland areas where their infrastructure is present.

PG&E's commitment to wildfire safety intensified in 2019 when the CPUC initiated the WMP project which aimed to create a roadmap for systematically reducing the risk of utility infrastructure-caused wildfires. To lead this effort, the Wildfire Safety Division defined long-term objectives that supported and led to the formation of Energy Safety. PG&E acknowledged this strategic roadmap for reducing utility-related wildfire risk in 2020 with its first implementation of the WMP and continues to build upon this commitment.

Throughout the 2023-2025 three-year cycle of the WMP, PG&E's primary objective is to construct, maintain, and operate its electric line and equipment in a way that minimizes the risk of catastrophic wildfire. This goal is pursued through ongoing initiatives that aim to assess the EC's wildfire risk, develop comprehensive strategies to reduce ignitions, and ensure the reliability of electric systems. Using risk-informed decision making, PG&E aims to minimize ignition risk and outage impacts.

Key Findings

PG&E achieved 98% initiative target completion, successfully implementing 54 of the 55 wildfire mitigation initiatives¹ for 2025. Several initiatives demonstrated substantial overperformance, with GH-05 (Transmission System Hardening) achieving 396% of its 5 circuit mile target by completing 19.80 circuit miles, VM-04 (Tree Removal Inventory) reaching 125% of target by mitigating 31,311 trees against a 25,000-tree goal, PS-06 (Portable Battery Distribution) attaining 115% of target by providing 3,798 batteries versus 3,300 planned, SA-02 (Line Sensor Installations) exceeding target by 113% with 45 circuits versus 40 targeted, and GH-01

¹ The IE identified 55 initiatives to undergo target implementation-verification. An additional three initiatives were determined to be funding only and are only included under the funding verification sections (GM-02; GH-08; & VM-19).

(Distribution System Hardening) completing 104% of target with 539.04 circuit miles versus 520 planned.

Field verification activities conducted by the IE revealed zero workmanship issues across 110 distribution hardening circuit miles, 98 undergrounding circuit miles, 19.80 transmission hardening circuit miles, 160 fuse removal locations, and 2 transmission conductor segment replacements, indicating effective construction standards and adequate contractor oversight.

VM-02 (Pole Clearing Program) counted "constrained" poles (5,961 poles) and "no work" poles (14,772 poles) toward the total 80,301 completion count, with "no work" poles often containing comments stating "rated low risk on vc fire matric in RR no clearing required," raising questions about completion metric definitions and risk reduction transparency. Of the 80,301 total poles reported as complete, only 60,396 poles (47,608 completed + 3,510 completed with partial refusal + 9,278 completed pending 1254C tree work) involved actual vegetation clearing or tree work, while 20,733 poles (5,961 constrained + 14,772 no work) were counted as complete without physical clearing occurring.

Substation inspection initiatives AI-08 (Distribution Substation Supplemental Inspections), AI-09 (Transmission Substation Supplemental Inspections), and AI-10 (Hydroelectric Substations and Powerhouses Supplemental Inspections) exhibited recurring documentation anomalies that, while not negating completion verification, indicate quality control gaps requiring remediation. Multiple aerial inspection forms did not include required gate photos but instead substituted line diagrams or as-built drawings of substations, representing a deviation from established inspection protocols that could obscure visual evidence of site conditions. Multiple infrared inspection forms listed issues as "na" without explanation, creating ambiguity about whether no issues were identified, issues were identified but not recorded, or the inspection method was unable to detect issues under prevailing conditions. Asset substitution errors occurred where inspection forms for one substation were provided in place of another (e.g., Kilarc transmission substation IR form provided instead of Cedar Creek distribution substation form, Coleman PH ground validation form provided instead of Colgate PH form), suggesting data management or quality control process breakdowns in documentation assembly. While these documentation discrepancies did not prevent the IE from validating that inspections occurred, they represent quality control gaps that could obscure more significant issues if similar documentation errors occurred at scale across thousands of inspection records rather than within a limited sample.

Initiatives Completed Within 5% of the WMP Targets: 54 Total Number of Initiatives (98% of all PG&E Initiatives)

Table 1: List of Initiatives that Missed Target or Could Not Be Validated

Initiative Number, WMP Section Number, and Name	Missed Target or Could Not Be Validated
VM-02, 8.2.3.1, Pole Clearing Program	Could Not Be Validated

Table 2: Initiatives with Absolute % Budget Differences > 10%: 27 Total Number of Initiatives (46% of all PG&E Initiatives)

Initiative Number, WMP Section Number, and Name	Total Budget	Total Expenditure	Total Variance Between Budget and Expenditure
AI-02, 8.1.3.1.1, Detailed Inspection Transmission - Ground	\$8,500	\$5,801	-31.8%
AI-04, 8.1.3.1.2, Detailed Inspection Transmission - Aerial	\$22,591	\$16,584	-26.6%
AI-05, 8.1.3.1.3, Detailed Inspection Transmission – Climbing	\$1,751	\$3,033	73.2%
AI-08, 8.1.3.3.1, Supplemental Inspections – Substation Distribution	\$2,702	\$1,854	-31.4%
AI-09, 8.1.3.3.1, Supplemental Inspections – Substation Transmission	\$1,701	\$2,660	56.4%
AI-10, 8.1.3.3.1, Supplemental Inspections – Hydroelectric Substations & Powerhouses	\$2,150	\$1,037	-51.8%
AI-11, 8.1.5, Filing Asset Inventory Gaps	\$2,500	\$686	-72.6%
GH-01, 8.1.2.1, System Hardening – Distribution	\$248,940	\$283,952	14.1%
GH-05, 8.1.2.5.1, System Hardening - Transmission	\$21,517	\$9,331	-56.6%
GH-06, 8.1.2.5.1, System Hardening - Transmission Shunt Splices	\$4,374	\$3,573	-18.3%
GH-10, 8.1.2.10.5, Non-Exempt Expulsion Fuse – Removal	\$5,485	\$8,200	49.5%
GM-01, 8.1.6.1, Asset Inspections - Quality Assurance	\$5,068	\$4,527	-10.7%
GM-03, 8.1.7.2, HFTD/HFRA Open Tag Reduction – Distribution Backlog	\$600	\$532	-11.3%

Initiative Number, WMP Section Number, and Name	Total Budget	Total Expenditure	Total Variance Between Budget and Expenditure
GM-09, 8.1.6.2, Asset Inspection – Quality Control	\$21,250	\$17,373	-18.2%
VM-01, 8.2.2.1.1, LiDAR Data Collection – Transmission	\$6,409	\$11,044	72.3%
VM-02, 8.2.3.1, Pole Clearing Program	\$27,363	\$32,851	20.1%
VM-03, 8.2.2.2.5, Focused Tree Inspection (FTI) Program	\$183,964	\$101,900	-44.6%
VM-04, 8.2.2.2.4, Tree Removal Inventory	\$70,386	\$29,429	-58.2%
VM-13, 8.2.2.1.1, Routine Ground – Transmission	\$24,797	\$27,553	11.1%
VM-14, 8.2.2.1.2, Transmission Second Patrol	\$1,152	\$1,872	62.5%
VM-15, 8.2.2.1.3, Integrated Vegetation Management – Transmission	\$15,524	\$13,682	-11.9%
VM-16, 8.2.2.2.1, Distribution Routine Patrol	\$745,303	\$885,992	18.9%
VM-17, 8.2.2.2.2, Distribution Second Patrol	\$124,040	\$143,387	15.6%
VM-18, 8.2.2.2.3, VM for Operational Mitigations (VMOM)	\$9,681	\$11,328	17.0%
SA-02, 8.3.3.1, Line Sensor – Installations	\$2,349	\$1,834	-21.9%
SA-05, 8.3.6.3, Evaluate FPI and IPW Modeling Enhancements	\$4,861	\$3,631	-25.3%
PS-06, 8.5.3, Provide Portable Batteries to PG&E Customers	\$12,795	\$5,043	-60.6%

Recommendations

Implement automated validation checks within the inspection platform to require photo upload confirmation before form submission is permitted, ensuring that required visual documentation cannot be bypassed or substituted with alternative file types. Eliminate free-text "na" entries by

enforcing structured dropdown selections with mandatory explanatory fields that require inspectors to specify whether no issues were identified, issues were identified but fall outside inspection scope, or inspection method limitations prevented issue detection under prevailing conditions.

PG&E should revise pole clearing completion counting methodology and reporting practices to separate “work completed” from “assessed and no work required,” enhancing transparency on actual risk mitigation activities versus locations where assessment determined clearing was unnecessary. PG&E should also revise the target and section 8.2.3.1 to draw distinction between a pole clearing completion target versus a pole assessment target. This approach will improve clarity on actual risk mitigation activities versus administrative completions, enabling more accurate year-over-year performance comparisons and understanding of program effectiveness.

Pacific Gas and Electric Company's 2025 Wildfire Mitigation Plan implementation demonstrates strong operational execution with 98% initiative target achievement across all five WMP categories and exceptional quality assurance performance with pass rates ranging from 99.24% to 100%. Field verification activities revealed zero workmanship issues across diverse construction activities, indicating effective quality control processes and adequate contractor oversight.

2. FOCUS INITIATIVES AND DISCUSSION

For WMP Implementation Year 2025, Energy Safety instructed the IE to select up to fifteen initiatives for a “focused” more thorough analysis. These “Focus Initiative” were chosen by BVNA based on several key factors.

First, the IE considered the number and nature of “Notice of Violations” (NOVs) and “Notice of Nonperformance” (NONs) received by the EC in 2025, prioritizing initiatives related to these violations to verify implementation efforts. Funding allocation was another crucial consideration, with initiatives receiving the highest planned or actual expenditure being selected. Additionally, initiatives showing significant variance (~20%) between planned and actual spending were generally chosen, especially if target goals were not met. The WMP Risk Impact Percentage was also evaluated to assess each initiative’s potential for fire risk reduction. Historically, grid hardening and vegetation management initiatives have proven most effective in mitigating fire risks and typically comprise the majority of Focus Initiatives. The specific fifteen initiative selected by BVNA for focused analysis are listed in Table 3 below. This approach to initiative selection ensures a thorough evaluation of the EC’s most critical and impactful wildfire mitigation efforts.

Table 3: List of Focus Initiatives

No.	Initiative Number, WMP Section Number, and Name
1	AI-07, 8.1.3.2.1, Detailed Ground & Aerial Inspections – Distribution
2	GH-01, 8.1.2.1, System Hardening – Distribution
3	GH-04, 8.1.2.2, 10K Undergrounding
4	GH-05, 8.1.2.5.1, System Hardening – Transmission
5	GH-10, 8.1.2.10.5, Non-Exempt Expulsion Fuse – Removal
6	GM-01, 8.1.6.1, Asset Inspections – Quality Assurance
7	GM-09, 8.1.6.2, Asset Inspections – Quality Control
8	PS-07, 9.1.5, Reduce PSPS Impacts
9	SA-10, 8.3.3.1, Distribution Fault Anticipation (DFA) – Installations
10	VM-02, 8.2.3.1, Pole Clearing Program
11	VM-04, 8.2.2.2.4, Tree Removal Inventory (TRI)
12	VM-05, 8.2.2.3.1, Defensible Space Inspections – Distribution Substation
13	VM-08, 8.2.5, Vegetation Management – Quality Assurance
14	VM-16, 8.2.2.2.1, Routine Patrol – Distribution
15	VM-22, 8.2.5.2, Vegetation Management – Quality Control

3. SITE AND SAMPLE SELECTION AND DISCUSSION

Table 4: List of Field Verified Initiatives

No.	Initiative Number, WMP Section Number, and Name
1	GH-01, 8.1.2.1, System Hardening – Distribution
2	GH-04, 8.1.2.2, 10K Undergrounding
3	GH-05, 8.1.2.5.1, System Hardening – Transmission
4	GH-06, 8.1.2.5.1, System Hardening, Transmission Shunt Splices
5	GH-10, 8.1.2.10.5, Non-Exempt Expulsion Fuse – Removal
6	GH-11, 8.1.2.5.1, System Hardening – Transmission Conductor Segment Replacement
7	GM-06, 8.1.2.10.1, EPSS – Down Conductor Detection (DCD)

Sample Location Methodology

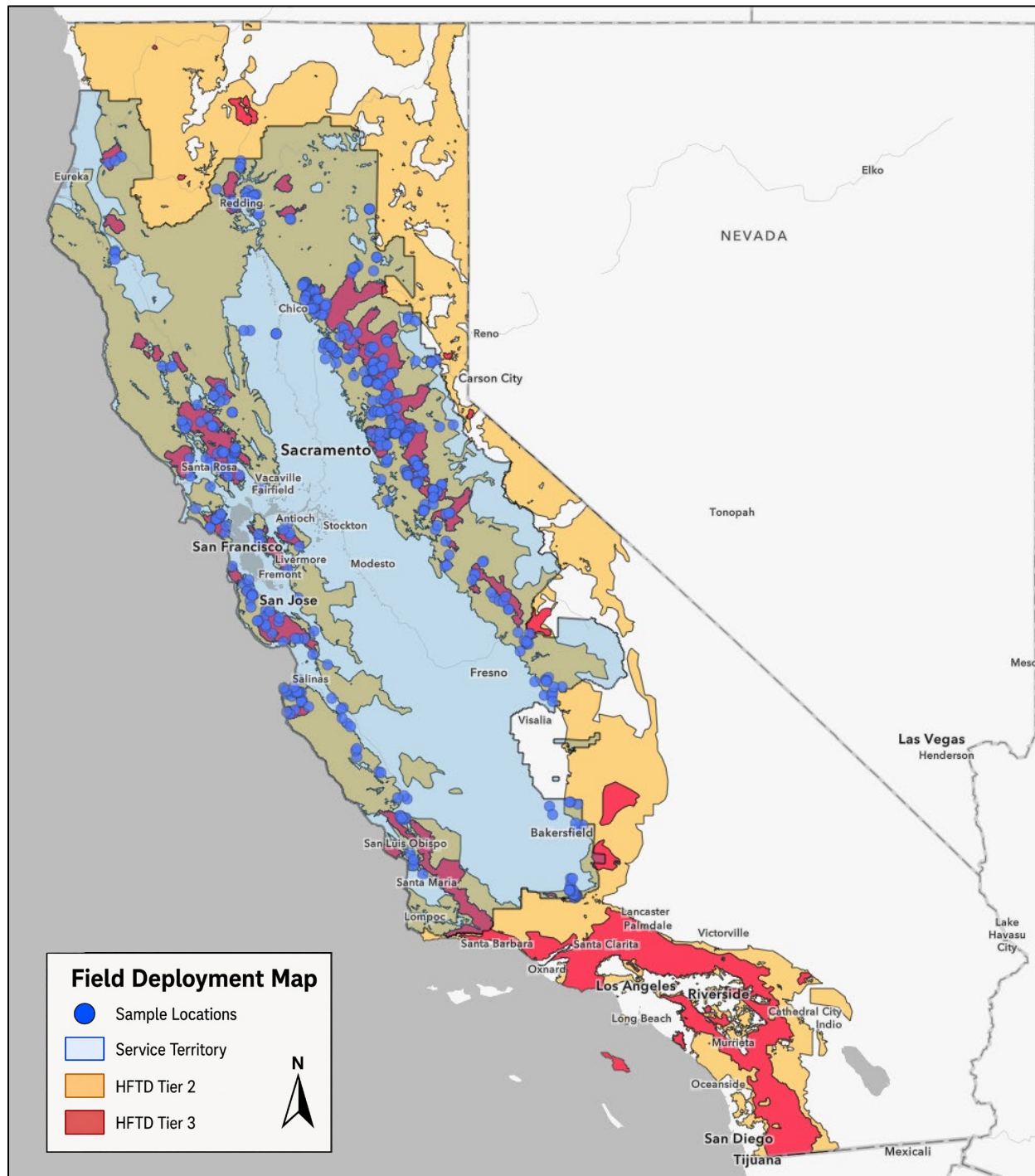
BVNA employed random sampling for PG&E utilizing a simplified version of Cochran’s Sample Size Formula. Utilization of this formula helps determine the appropriate sample size required to achieve a desired level of precision and confidence in the results – this ensures that the sample is representative of the larger population. By specifying a confidence level for the EC’s individual initiatives based upon historical trends and data, mainly previous year’s validation rates, the conclusions drawn from the sample data have a higher degree of statistical confidence. This confidence rate ranged from 85% and 95%, and if the previous year’s validation rate fell outside of this range, the low or high end was utilized. For example, if the prior year sample validation rate was 96%, then 95% was used, if the previous year sample validation rate was 84%, then 85% was used. If no information on the prior year’s sample validation rate exists, then 90% was used, unless other factors influenced that determination.

Whether or not an initiative was classified as Focus or non-Focus also affected the number of samples required for a given initiative. For Focus Initiatives, the margin of error (MOE) was set at 5% and for non-Focus Initiatives, the MOE was set at 10%. Although there is only a 5% difference between these two MOEs, the difference in sample size produced when utilizing these two MOE values is quite significant. As the margin of error *increases*, the required sample size decreases because a larger margin of error allows for *more* variability in the sample, requiring fewer samples to achieve the desired level of precision. As the margin of error *decreases*, the opposite happens because a smaller margin of error allows for *less* variability in the sample, requiring more samples to achieve the desired level of precision. Therefore, Focus Initiatives require more sampling than non-Focus Initiatives.

Once the total number of samples was calculated for each initiative, the IE determined how many samples should come from non-HFTD, HFTD Tier 2, and HFTD Tier 3 areas. Due to HFTD-Tier 3 areas posing the most significant threat to wildfire ignition risk, it was determined that 70% of the sampling would occur in these areas, while 20% of sampling would occur in HFTD Tier 2 areas, and the remaining 10% would occur in non-HFTD areas. If a certain initiative did not reside within a HFTD Tier 3 area, then the sampling number would be drawn from a HFTD Tier 2 area;

if an initiative did not reside within either a HFTD Tier 3 or 2 area, then all samples were drawn from the non-HFTD area. An additional 25% of samples were identified to be used in the case that any of the primary samples were unusable or inaccessible.

Figure 1: Overview of Field Areas Sampled



4. REVIEW OF INITIATIVES ACROSS WMP CATEGORIES: IMPLEMENTATION AND FUNDING

Table 5: WMP Initiative Category Initiative Summary

WMP Initiative Category	No. of Focus and Field Verifiable Initiatives	No. of Focus and Non-Field Verifiable Initiatives	No. of Non-Focus and Field Verifiable Initiatives	No. of Non-Focus and Non-Field Verifiable Initiatives
Grid Design, Operations, and Maintenance	4	3	3	12
Vegetation Management and Inspections	0	6	0	10
Situational Awareness and Forecasting	0	1	0	5
Emergency Preparedness	0	1	0	8
Community Outreach and Engagement	0	0	0	2

Funding Evaluation Methodology

The IE employed a comprehensive approach to evaluate funding compliance for each initiative in the WMP. The funding methodology approach included the following:

Budget Baseline Establishment: The IE established a baseline for planned expenditures by thoroughly reviewing budget information documented in PG&E's approved 2025 WMP filing. These planned budget figures were cross verified against PG&E's officially reported data, specifically examining the May 2026 EC AIR Table 4 which took precedence if any discrepancies were noted.

Actual Expenditure Verification: Actual financial expenditures reported by PG&E in their May 2026 EC ARC Table 4 Finance for Expense and Capital were compared against established WMP budget baselines.

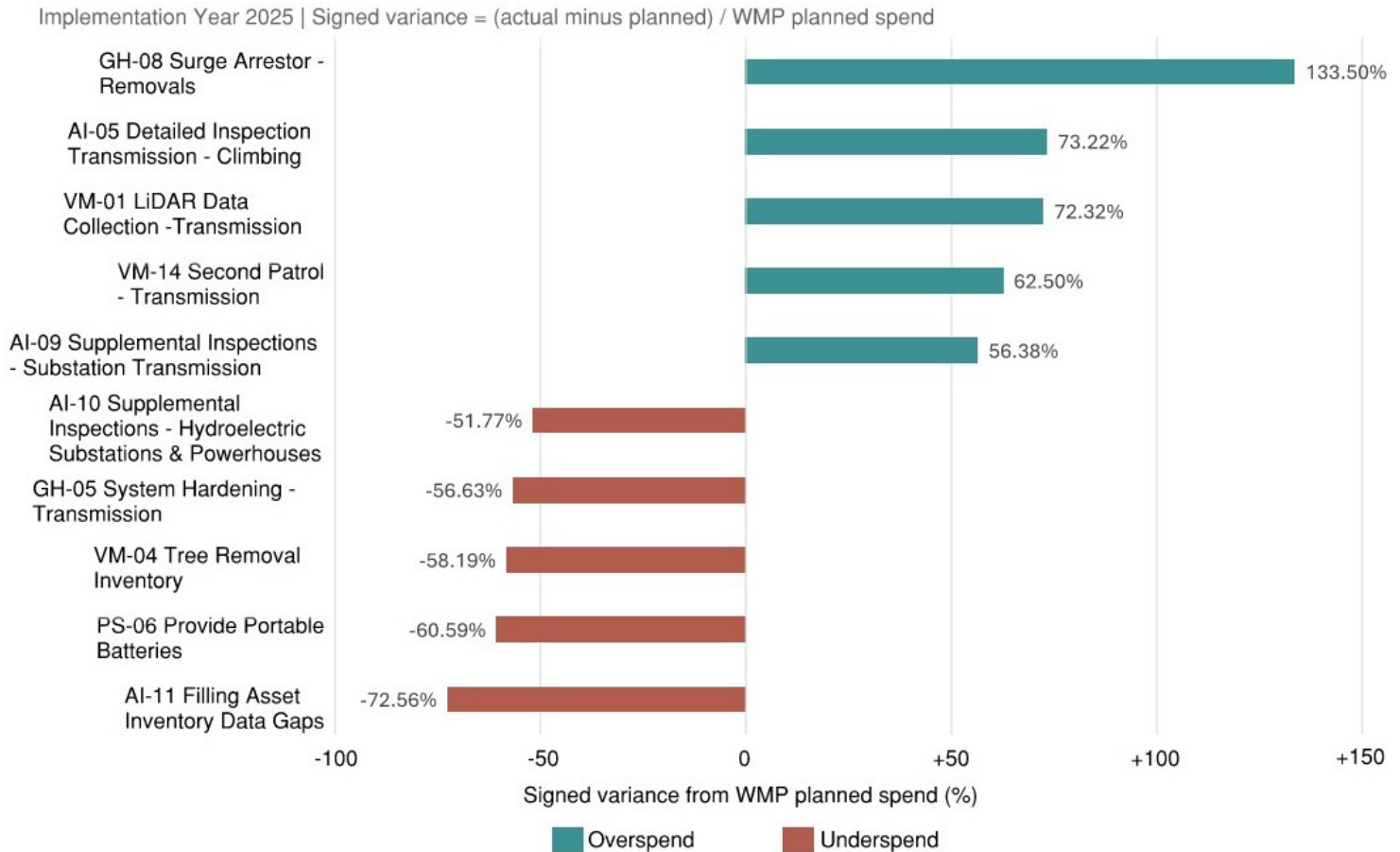
Variance Analysis: The IE calculated the absolute percent differences for each initiative by applying the formula as required by Energy Safety guidelines. These calculations were conducted for every initiative, generating detailed variance data for further review and analysis.

Threshold Application: A predefined threshold of 10% absolute percent difference was applied to systematically identify initiatives that required deeper review.

Supporting Documentation Review: For initiatives exceeding the established 10% variance threshold, the IE requested additional supporting documentation and detailed explanations from PG&E. If PG&E's rationale provided in the ARC was insufficient or incomplete, the IE explicitly asked for further documentation as necessary to achieve clarity and validate the reasoning behind the variances.

Detailed Analysis and Reporting: The IE documented any funding discrepancies identified during the evaluation, provided accurate corrected values, and analyzed the underlying causes for each variance, as detailed in Section 4 of this report and the top five (5) positive and negative variances as summarized in Figure 2.

Figure 2: Top 5 Positive & Negative Budget Variance by Initiative (%)



Note: Positive values indicate actual spend above WMP planned spend; negative values indicate actual spend below WMP planned spend. Spend reported in thousands of dollars.

4.1 GRID DESIGN, OPERATIONS, AND MAINTENANCE

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.1.1 Initiative Summary Table

Table 6: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ²	Sample Validation Rate (%) ^{3, 4}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{5, 6}	WMP – Planned Spend (\$) ⁷	EC-Claimed Actual Spend (\$ and % from budget) ⁷	Satisfied Risk Reduction Goal? ⁸
AI-01, 8.1.9.1, Retainment of Inspectors and Internal Workforce Development	1. Develop a plan to increase retention over time for trained and qualified inspectors. 2. Develop a plan to focus on increasing and sustaining a consistent, year-over-year internal workforce that builds on existing experience and mentors new employees for asset inspections.	Increased permanent compliance inspector headcount in organization by 74 inspectors and increased employee tenure.	Complete	N/A	N/A	PG&E Headcount 2023-2025 (DR003 Remaining Frontload Data)	100%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	No Goal Provided
AI-02, 8.1.3.1.1, Detailed Inspection Transmission - Ground	22,000 Ground Inspections	24,033 Ground Inspections	Complete	35 Ground Inspections	100%	Transmission Ground Inspection List (Frontload Data) 35 Inspection Records (DR007)	109%	\$8,500	\$5,801 (-31.8%)	TBD
AI-04, 8.1.3.1.2, Detailed Inspection Transmission - Aerial	19,000 Aerial Inspections	23,519 Aerial Inspections	Complete	35 Aerial Inspections	100%	Transmission Aerial Inspection List (Frontload Data) 35 Inspection Records (DR008)	124%	\$22,591	\$16,584 (-26.6%)	TBD

² N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

³ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

⁴ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

⁵ The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.

⁶ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.

⁷ For entries with “Not Reported on Table 4 of the 2025 EC AIR,” the IE requested more information in DR005. PG&E informed the IE that these initiatives are considered “Provider Cost Center (PCC) Costs” and deal with qualitative initiative work and PG&E does not track specific costs for these initiatives to report on.

⁸ “No Goal Provided” is listed when the 2023-2025 WMP does not contain any information on % Risk Impact (% Risk Reduction Goal or TBD or N/A). “TBD” and “N/A” are entries that PG&E utilizes for certain initiative’s % Risk Impact and is not an IE determination, but rather a determination made by PG&E.



Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ²	Sample Validation Rate (%) ^{3, 4}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{5, 6}	WMP – Planned Spend (\$) ⁷	EC-Claimed Actual Spend (\$) and % from budget ⁷	Satisfied Risk Reduction Goal? ⁸
AI-05, 8.1.3.1.3, Detailed Inspection Transmission – Climbing	1,200 Climbing Inspections	1,873 Climbing Inspections	Complete	34 Climbing Inspections	100%	Transmission Climbing Inspection List (Frontload Data) 34 Inspection Records (DR009)	141%	\$1,751	\$3,033 (73.2%)	TBD
AI-06, 8.1.3.1.4, Transmission Infrared Inspections	3,500 Circuit Miles of Infrared Inspections	4,222 Circuit Miles of Infrared Inspections	Complete	34 Circuit Miles	100%	Transmission Infrared Inspection List (Frontload Data) 34 Circuit Miles of Inspection Records (DR010)	121%	\$1,549	\$1,399 (-9.7%)	TBD
AI-07, 8.1.3.2.1, Detailed Ground Inspections - Distribution	244,000 Ground & Aerial Pole Inspections	279,939 Ground & Aerial Pole Inspections	Complete	138 Substation Inspections	100%	Distribution Ground Inspection List (Frontload Data) 138 Inspection Records (DR011)	115%	\$40,228	\$36,279 (-9.8%)	No 45% (Eyes-On)
AI-08, 8.1.3.3.1, Supplemental Inspections – Substation Distribution	78 Substations Inspections	78 Substation Inspections	Complete	24 Substation Substations	99%	Distribution Substation Inspection List (Frontload Data) 24 Inspection Records (DR012)	99%	\$2,702	\$1,854 (-31.4%)	TBD
AI-09, 8.1.3.3.1, Supplemental Inspections – Substation Transmission	41 Substations Inspections	41 Substation Inspections	Complete	19 Substation Inspections	98%	Transmission Substation Inspection List (Frontload Data) 19 Inspection Records (DR013)	98%	\$1,701	\$2,660 (56.4%)	TBD
AI-10, 8.1.3.3.1, Supplemental Inspections – Hydroelectric Substations & Powerhouses	40 Hydro Substation & Powerhouse Inspections	41 Hydro Substation & Powerhouse Inspections	Complete	19 Substation Inspections	98%	Hydroelectric & Powerhouse Inspection List (Frontload Data) 19 Inspection Records (DR014)	101%	\$2,150	\$1,037 (-51.8%)	TBD
AI-11, 8.1.5, Filing Asset Inventory Gaps	1. List of targeted distribution and transmission equipment types. 2. Baseline and actual rate of completeness for the “Installation Date” data element for each targeted distribution and transmission equipment type.	Population of missing age data in the Asset Inventory and Condition Database was completed to more than 90 percent weighted average across risk prioritized distribution and transmission equipment types.	Complete	N/A	N/A	Baseline and Endline Assets Fill Rate (DR003 Remaining Frontload Data)	100%	\$2,500	\$686 (-72.6%)	No Goal Provided
GH-01, 8.1.2.1, System Hardening – Distribution	520 Circuit Miles of Distribution Hardening	539.01 Circuit Miles of Distribution Hardening	Complete	110 Circuit Miles	100%	Field Evaluation System Hardening – Distribution GIS Documentation (DR002) As-Builts (DR022)	104%	\$248,940	\$283,952 (14.1%)	Yes 4.70%

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ²	Sample Validation Rate (%) ^{3, 4}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{5, 6}	WMP – Planned Spend (\$) ⁷	EC-Claimed Actual Spend (\$) and % from budget ⁷	Satisfied Risk Reduction Goal? ⁸
GH-02, 8.1.2.1, Evaluate Covered Conductor Effectiveness	Update the covered conductor recorded effectiveness calculation using 2023 and 2024 outage data on the lines that have Covered Conductors for consideration in future system hardening workplans.	The program was able to provide a Whitepaper showing the updated covered conductor effectiveness calculation.	Complete	N/A	N/A	2025 Covered Conductor Estimated Effectiveness (Frontload Data)	100%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	No Goal Provided
GH-04, 8.1.2.2, 10K Undergrounding	330 Circuit Miles of 10K Undergrounding	333.82 Circuit Miles of 10K Undergrounding	Complete	98 Circuit Miles	100%	Field Evaluation 10K Undergrounding GIS Documentation (DR002) As-Built (DR024)	101%	\$1,212,822	\$1,210,527 (-0.2%)	Yes 3.50%
GH-05, 8.1.2.5.1, System Hardening - Transmission	5 Circuit Miles of Transmission Hardening	19.80 Circuit Miles of Transmission Hardening	Complete	17 Circuit Miles	100%	Field Evaluation System Hardening - Transmission GIS Documentation (DR002) As-Built (DR025)	396%	\$21,517	\$9,331 (-56.6%)	Yes <1%
GH-06, 8.1.2.5.1, System Hardening - Transmission Shunt Splices	Install Shunt Splices on 25 Transmission Lines	Shunt Splices Installed on 25 Transmission Lines	Complete	15 Shunt Splices	93%	CalFire 2022 Powerline Equipment Identification Pocket Guide v2 Field Evaluation System Hardening - Transmission GIS Documentation (DR002)	93%	\$4,374	\$3,573 (-18.3%)	TBD
GH-10, 8.1.2.10.5, Non-Exempt Expulsion Fuse – Removal	Remove Non-Exempt Expulsion Fuses from 1,400 Fuse Locations	Non-Exempt Expulsion Fuses Removed from 1,451 Locations	Complete	126 Expulsion Fuses	100%	CalFire 2022 Powerline Equipment Identification Pocket Guide v2 Field Evaluation Non-Exempt Expulsion Fuse – Removal GIS Documentation (DR002)	104%	\$5,485	\$8,200 (49.5%)	Yes <1%
GH-11, 8.1.2.5.1, System Hardening – Transmission Conductor Segment Replacement	Replace Conductor Segments on 2 Transmission Lines	Conductor Segments Replaced on 2 Transmission Lines	Complete	2 Conductor Segments	100%	Field Evaluation System Hardening – Transmission Conductor Segment Replacement GIS Documentation (DR002)	100%	\$1,112	\$1,031 (-7.3%)	Yes <1%
GM-01, 8.1.6.1, Asset Inspections - Quality Assurance	Transmission – 500 audit locations; 95% pass rate Distribution – 1,500 audit locations; 95% pass rate	Transmission – 1,783 audit locations; 100% pass rate Distribution – 1,778 audit locations; 99.83% pass rate	Complete	67 Distribution 66 Transmission	100%	QA Distribution Audit List QA Transmission Audit List (Frontload Data) 67 Distribution Audit Records 66 Transmission Audit Records (DR029)	Transmission – 357% Distribution – 125%	\$5,068	\$4,527 (-10.7%)	N/A



Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ²	Sample Validation Rate (%) ^{3, 4}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{5, 6}	WMP – Planned Spend (\$) ⁷	EC-Claimed Actual Spend (\$ and % from budget) ⁷	Satisfied Risk Reduction Goal? ⁸
GM-03, 8.1.7.2, HFTD/HFRA Open Tag Reduction – Distribution Backlog	25,000 Additional EC Notifications Closed 25,000 HFTD/HFRA Notifications Closed	127,291 Tags Closed	Complete	35 Tags	100%	Closed Tags List (Frontload Data) Order Cancellation Forms, Contractor Face Sheets, O-Calc GO95 Forms, and EH Overhead Tag Forms (DR030)	255%	\$600	\$532 (-11.3%)	Yes <1%
GM-06, 8.1.2.10.1, EPSS - Down Conductor Detection (DCD)	Install 250 DCD Protective Devices	494 DCD Protective Devices Installed	Complete	32 DCD Protective Devices	100%	CalFire 2022 Powerline Equipment Identification Pocket Guide v2 Field Evaluation EPSS - Down Conductor Detection (DCD) GIS Documentation (DR002)	198%	\$31,259	\$33,977 (8.7%)	Yes <1%
GM-07, 8.1.8.1.1, Update on EPSS Reliability Study	Annual EPSS Reliability Study 2/15/2025 for 2024 data	Reliability study submitted to Energy Safety on 02/18/2025	Complete	N/A	N/A	EPSS Reliability Study – Evaluation and Reporting Narrative (Frontload Data) Energy Safety E-Filing Website	100%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	No Goal Provided
GM-09, 8.1.6.2, Asset Inspection – Quality Control	Transmission – 17,450 audit locations; 95 percent pass rate Distribution – 170,000 audit locations; 95 percent pass rate	Transmission – 19,842 audit locations; 99.5 percent pass rate Distribution – 177,442 audit locations; 99.92 percent pass rate	Complete	68 Distribution 70 Transmission	100%	QC Distribution Audit List QC Transmission Audit List (Frontload Data) 68 Distribution Audit Records 70 Transmission Audit Records (DR033)	Transmission – 114% Distribution – 105%	\$21,250	\$17,373 (-18.2%)	N/A



4.1.2 Written Detail for Initiatives

4.1.2.1 Initiative Review – Findings & Method

AI-01 – 8.1.1.1 Retainment of Inspectors and Internal Workforce Development – Non-Focus and Non-Field Verifiable

AI-01 outlines PG&E’s plan development to increase retention over time for trained and qualified inspectors. PG&E states that plan development also further includes focus on increasing and sustaining a consistent, year-over-year internal workforce that builds on existing experience and mentors new employees for asset inspections. PG&E objective for 2025 was to develop a plan to increase retention for inspectors and develop a plan to focus on increasing and sustaining an internal workforce. PG&E did not provide a risk reduction goal for this initiative.

In support of AI-01, PG&E was asked to provide the multi-year resource plan(s), or other documentation, that were developed to increase retention of trained and qualified inspectors. Per the 2025 EC AIR, PG&E states that evaluation of this initiative has increased their permanent compliance inspector headcount by 74 inspectors and has increased employee tenure. The 2025 EC AIR specifically states that this goal was completed on February 11, 2025. The utility provided an Excel spreadsheet titled “PGE_DR-003_20260327_AI-01 RESPONSE_1001_ATCH001” which shows staffing headcounts for 2023, 2024, and 2025 with the data validating the statement that 74 additional inspectors have been hired as well as 5 additional supervisors.

Although the documentation demonstrates that PG&E hired additional inspectors and retained the same headcount for 2023, 2024, and 2025, PG&E should provide detail on the specific plan and utilization of this plan to increase retention of inspectors. By providing this additional information and context, PG&E better demonstrates alignment with the explicit WMP objective.

Based on this analysis and the documentation reviewed, the IE has validated this initiative.

Table 7: Retainment of Inspectors and Internal Workforce Development

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data (DR003) Response	Initiative Validation Rate
1. Develop a plan to increase retention over time for trained and qualified inspectors. 2. Develop a plan to focus on increasing and sustaining a consistent, year-over-year internal workforce that builds on existing experience and mentors new employees for asset inspections.	Increased permanent compliance inspector headcount in organization by 74 inspectors and increased employee tenure.	Completed	Increase in Staffing Levels	100%

AI-02 – 8.1.3.1.1 Detailed Inspection Transmission - Ground – Non-Focus and Non-Field Verifiable

Transmission overhead assets in the HFTD and HFRA are inspected in accordance with the ETPM and informed by the FMEA. Ground inspections are performed visually via an inspector on the ground. These inspections seek to identify asset conditions which could lead to an ignition. Structures in the HFTD and HFRA are inspected at least once every three years. In addition to the baseline cycle, structures may also be added to the annual inspection scope based on: wildfire risk informed by the Transmission Composite Model (TCM) annualized probability of failure and Wildfire Consequence; and other factors such as inspection result trends, terrain/fire suppression considerations, etc.

The WMP set a target of 22,000 structures inspected in 2025. PG&E did not provide a risk reduction goal for this initiative. Data provided as part of the frontload request in spreadsheet format contained 24,033 records. Records included, but were not limited to, fields such as Equipment #, Region, Division, Asset Wildfire Tier, Month Completed, Circuit ID, Circuit Name, County, and Status. All records had a “Complete” status, substantiating the amount of inspections claimed in the Q4 QDR. PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 23.36% Eyes-on-Risk achieved.

The IE requested inspection reports along with associated photos and work/repair orders where available in DR007. These reports were to be from each HFTD with three (3) from non-HFTD, seven (7) from HFTD Tier 2, and 25 from HFTD Tier 3. PG&E responded by providing 35 inspection reports that included, but were not limited to, information such as date inspected, GPS location, structure number, Transmission line name, voltage, HFTD, and notification tasks. Several forms were reinspections of previously identified issues, either priority E or F. Where the reinspection confirmed the issue(s) was unremedied, a new due date was assigned, usually within 12 months of the reinspection.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 8: Detailed Inspection Transmission - Ground

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR007 Response	Initiative Validation Rate
22,000 Inspections	N/A	24,033 Inspections	24,033 Inspections	109%

AI-04 – 8.1.3.1.2 Detailed Inspection Transmission - Aerial – Non-Focus and Non-Field Verifiable

Transmission overhead assets in the HFTD and HFRA are inspected in accordance with the ETPM and/or the FMEA. Aerial inspections are performed via drone, helicopter, or aerial lift, with desktop image review. These inspections seek to identify asset conditions which could lead to an

ignition. PG&E conducts aerial detail inspections of structures in the HFTD and HFRA at least once every three years. In addition to this baseline cycle, structures may also be added to the annual inspection scope based on: wildfire risk informed by the TCM annualized probability of failure and Wildfire Consequence; and other factors such as inspection result trends, terrain/fire suppression considerations, etc.

The WMP set a target of 19,000 structures inspected in 2025. PG&E did not provide a risk reduction goal for this initiative. As part of the frontload data request, PG&E provided a spreadsheet with 23,519 records. These records included, but were not limited to, information such as Equipment #, region, division, Month completed, Asset Wildfire Tier, Circuit, Circuit Name, County, and Status. All records in the spreadsheet had a “Completed” status. PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 30.68% Eyes-on-Risk achieved.

The IE requested inspection reports along with associated photos and work/repair orders where available in DR008. These reports were to be from each HFTD with three (3) from non-HFTD, seven (7) from HFTD Tier 2, and 25 from HFTD Tier 3. PG&E responded by providing 35 inspection reports that included, but were not limited to, information such as inspection date, equipment GPS, equipment ID, transmission line name, voltage, and notification tasks. Several reports identified issues requiring remediation, however no deadline for remediating these issues was specified.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 9: Detailed Inspection Transmission - Aerial

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR008 Response	Initiative Validation Rate
19,000 Inspections	N/A	23,519 Inspections	23,519 Inspections	124%

AI-05 – 8.1.3.1.3 Detailed Inspection Transmission - Climbing – Non-Focus and Non-Field Verifiable

Transmission overhead assets in the HFTD and HFRA are inspected in accordance with the ETPM and/or FMEA. Climbing inspections are performed visually by an inspector climbing the structure. Measurements are also taken for structures climbed with internal guy wires. PG&E conducts these inspections to identify asset conditions which could lead to an ignition. PG&E conducts a climbing inspection on structures in the HFTD and HFRA that are 500 kV or contain internal guy wires at least once every three years. In addition to this baseline cycle, structures may also be added to the annual inspection scope based on: wildfire risk informed by the TCM annualized probability of failure and wildfire consequence; and other factors such as inspection result trends, terrain/fire suppression considerations, etc.

The WMP set a target of 1,200 structures inspected in 2025. PG&E did not provide a risk reduction goal for this initiative. Data provided as part of the frontload request in spreadsheet format contained 1,696 records. Records included, but were not limited to, fields such as Equipment #, Region, Division, Asset Wildfire Tier, Circuit, Circuit Name, and Status. All records had a “complete” status. PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 1.77% Eyes-on-Risk achieved.

The IE requested inspections reports along with associated photos and work/repair orders where available in DR009. These reports were to be from each HFTD with four (4) from non-HFTD, six (6) from HFTD Tier 2, and 24 from HFTD Tier 3. PG&E responded by providing 34 inspection reports that included, but were not limited to, information such as date inspected, GPS location, structure number, transmission line name, voltage, HFTD, and notification tasks. Several forms contained notification tasks on previously identified issues. The date of the original LC was not always included nor was a date included on newly identified issues. No date or deadline for remediation was included except on one form.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 10: Detailed Inspection Transmission - Climbing

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR009 Response	Initiative Validation Rate
1,200 Inspections	N/A	1,873 Inspections	1,696 Inspections	141%

AI-06 – 8.1.3.1.4 Transmission Infrared Inspection – Non-Focus and Non-Field Verifiable

Transmission overhead assets in the HFTD and HFRA are inspected in accordance with the ETPM and/or FMEA. Infrared (IR) inspections are performed via helicopter and are conducted simultaneously with corona inspections to proactively identify asset conditions which could result in an ignition. IR inspection effectiveness depends on adequate circuit loading and weather conditions. For example, a circuit on the coast may have IR performed in the winter when lines are more heavily loaded in order to produce more effective results. Transmission IR inspections are completed on HFTD Tier 3 lines annually and on HFTD Tier 2 lines at least once every three (3) years.

The WMP set a target of 3,500 circuit miles inspected in 2025. PG&E did not provide a risk reduction goal for this initiative. Data provided as part of the frontload request in spreadsheet format with tabs for each quarter. First quarter contained 136 records with a total sum of 2,438 circuit miles; second quarter contained 155 records with a total sum of 2,638 circuit miles; third quarter contained 201 records with a total sum of 2,973 circuit miles; and fourth quarter contained 46 records with a total sum of 785 circuit miles. Records included, but were not limited to, fields such as unique ID, region, line name, circuit miles, flight name, and general notes. All records were completed in 2025 according to the Inspection Date column. PG&E claimed 4,222 circuit

miles in the HFTD for this initiative. A total of 4,613 non-HFTD circuit miles were also inspected using IR, but these circuit miles were not counted towards the initiative target by PG&E. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 63.95% Eyes-on-Risk achieved.

The IE requested inspection reports along with associated photos and work/repair orders where available in DR010. These reports were to be from each HFTD with approximately four (4) circuit miles from non-HFTD, approximately six (6) circuit miles from HFTD Tier 2, and approximately 25 circuit miles from HFTD Tier 3. PG&E responded by providing 11 IR data sheets that included, but were not limited to, information such as Circuit Miles broken out by HFTD, Line Name, Voltage, Reason for Inspection, Inspection Date, and anomaly reporting. Across all 11 IR data sheets, a total of 24.3 HFTD Tier 3 circuit miles, 6.1 HFTD Tier 2 circuit miles, and 4.8 non-HFTD circuit miles were provided. No anomalies were reported in the IR data sheets provided.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 11: Transmission Infrared Inspection

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR010 Response	Initiative Validation Rate
3,500 Circuit Miles	N/A	4,222 Circuit Miles	4,222 HFTD Circuit Miles (4,613 Non-HFTD Circuit Miles)	121%

AI-07 – 8.1.3.2.1 Detailed Ground Inspection – Focus and Non-Field Verifiable

Enhanced detailed inspections of overhead distribution assets seek to proactively identify areas where corrective work needs to be conducted to alleviate imminent equipment failures that could create fire or safety risk. Distribution overhead assets in HFTD and HFRA are visually inspected in accordance with GO 165 and with the criteria and guidance set forth in PG&E's EDPM and Overhead Job Aid. To develop the detailed inspection strategy, PG&E aggregated support structures up to the plat map level. The plat map is a geographic unit historically used by inspectors. Completing inspection at the plat map level ensures that inspections are executed efficiently with inspectors completing a set of structures at a given location. PG&E designated plat maps as extreme, severe, high, medium, or low based on the average wildfire consequence of the structures within that plat map.

The WMP set a target of 244,000 poles inspected in 2025. PG&E outlined a 45% Eyes-on-Risk reduction goal for this initiative. Data was provided as part of the frontload request in spreadsheet format and had multiple tabs such as ED Ground Attainment, Ground ADO, Ground JY, ED Air Attachment, Air CGI, Air JY, Air ADO, and Not Inspectable. The total sum of records in each of these tabs was 279,939. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact

of 33.54% Eyes-on-Risk achieved, falling short of the target provided in the WMP. PG&E attributes this shortfall to a deliberate front-loading strategy where higher-risk assets were prioritized and inspected in 2023 and 2024, leaving lower-risk assets for 2025 inspections. Despite missing the 2025 risk target, PG&E contends that this approach successfully met the overall three-year commitment. Specifically, PG&E reports an average of 48% Eyes-on-Risk reduction across the full 2023-2025 cycle, exceeding the 44% three-year average established in the WMP.

The IE requested inspection reports along with associated photos and work/repair orders where available in DR011. These reports were to be from each HFTD with 14 from non-HFTD, 27 from HFTD Tier 2, and 97 from HFTD Tier 3. PG&E responded by providing 138 inspection reports, 65 of which were Overhead (OH) checklists and the remaining 73 of which were aerial inspections. OH checklists included, but were not limited to, information such as Asset Details, Access & Confirmations, Structure, Cross Arm & Insulator/Circuit, Conductor, Equipment, Additional Conditions, and Photos. Several forms contained validation of previously identified deficiencies. Only rarely was a deadline asserted for remediation of deficiencies identified as still valid, usually with an increase in priority. Aerial inspections were performed remotely from desktop and included Asset Details, Structure, Crossarm, Conductor, Equipment, and Other fields. There were no photos associated with aerial inspection reports. Deficiencies were noted in the appropriate section; no deadline was asserted for remediation of deficiencies in any aerial inspection report.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 12: Detailed Ground Inspection

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR011 Response	Initiative Validation Rate
244,000 Poles	N/A	279,939 Poles	279,939 Poles	115%

AI-08 – 8.1.3.3.1 Supplemental Inspections - Substation Distribution – Non-Focus and Non-Field Verifiable

The substation supplemental (enhanced) inspection program is a comprehensive inspection of all the assets inside substations that are located within HFTD and HFRA areas. These inspections are designed to identify equipment issues and damage that may adversely impact reliable operations and/or pose an ignition risk. Supplemental substation inspections are performed in addition to the routine inspections (GO 174) that are part of the maintenance practices described in PG&E's supplemental Equipment Maintenance Requirements Standard. The supplemental inspection program includes three methods of inspection: drone-based aerial inspection, ground-based visual inspection, and infrared inspection. These inspections are guided by digital checklists that align to the FMEA for substation structures, associated equipment and components. The information gathered from supplemental inspections may inform new programmatic responses including equipment replacements, improvements to maintenance policies, changes in the frequency of maintenance, or guidance clarifications.

The WMP set a target of 78 substation inspections in 2025. PG&E did not provide a risk reduction goal for this initiative. Data was provided as part of the frontload request in spreadsheet format with 78 records. Records included, but were not limited to, fields such as facility name, aerial, ground, infrared, facility complete, date of completion, and tier type. All three (3) sets of inspections (aerial, ground, and infrared) were completed between April and June in 2025 according to the Inspection Date column. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 68% Eyes-on-Risk achieved.

The IE requested inspection reports along with associated photos and work/repair orders where available in DR012. These reports were to be from each HFTD with 10 from HFTD Tier 2 and 14 from HFTD Tier 3. PG&E responded by providing 72 PDF files that included, but were not limited to, substation, inspector, date, and for IR inspections, issues.

Several discrepancies were identified in the submitted documentation:

- Multiple IR inspection forms listed issues as “na” without explanation
- Multiple aerial inspection forms lacked the required gate photo, substituting a line diagram/as-built drawing instead
- An IR inspection form for Kilare Transmission Substation was submitted instead of the requested Cedar Creek Distribution Substation Form (resulting in a 99% sample validation rate)

Despite these inconsistencies in documentation, the submitted reports and associated data demonstrated that PG&E performed inspections at the sampled locations. PG&E needs to clarify what the “na” entries on the IR inspections forms means and should require proper photo documentation or add contextual information for any qualified substitution.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 13: Supplemental Inspections - Substation Distribution

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR012 Response	Initiative Validation Rate
78 Inspections	N/A	78 Inspections	78 Inspections	99%

AI-09 – 8.1.3.3.1 Supplemental Inspections - Substation Transmission – Non-Focus and Non-Field Verifiable

The substation supplemental (enhanced) inspection program is a comprehensive inspection of all the assets inside substations that are located within HFTD and HFRA areas. These inspections are designed to identify equipment issues and damage that may adversely impact reliable operations and/or pose an ignition risk. Supplemental substation inspections are performed in addition to the routine inspections (GO 174) that are part of the maintenance practices described in PG&E's supplemental Equipment Maintenance Requirements Standard. The supplemental inspection program includes three methods of inspection: drone-based aerial inspection, ground-based visual

inspection, and infrared inspection. These inspections are guided by digital checklists that align to the FMEA for substation structures, associated equipment and components. The information gathered from supplemental inspections may inform new programmatic responses including equipment replacements, improvements to maintenance policies, changes in the frequency of maintenance, or guidance clarifications.

The WMP set a target of 41 substation inspections in 2025. PG&E did not provide a risk reduction goal for this initiative. Data provided as part of the frontload request in spreadsheet format with 41 records. Records included, but were not limited to, fields such as facility type, facility name, area, HQ, and HFTD. There were also columns for Aerial General Conditions, Aerial Completion Validation, Ground General Conditions, Ground Completion Validation, and IR Inspection. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 22% Eyes-on-Risk achieved.

The IE requested inspection reports along with associated photos and work/repair orders where available in DR013. These reports were to be from each HFTD with eight (8) from HFTD Tier 2 and 11 from HFTD Tier 3. PG&E responded by providing 57 PDF Files that included, but were not limited to, substation, inspector, date, and for IR inspections, issues. There were multiple IR inspection forms that listed Issues as "na". No explanation was provided for this. Furthermore, there were multiple aerial inspection forms that did not include the required gate photo but rather had a line diagram/as-built drawing of the substation instead. Lastly, a Ground Completion Validation form for Colgate PH was provided rather than the same form for Coleman PH; Coleman PH was the substation intended to be provided by PG&E based on the Aerial Completion Validation and IR Inspection (resulting in a 98% sample validation rate). None of these minor discrepancies negate the fact that all three (3) sets of inspections were performed for the substations provided as samples. PG&E needs to clarify what the "na" entries on the IR inspections forms means and should require proper photo documentation or add contextual information for any qualified substitution.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 14: Supplemental Inspections - Substation Transmission

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR013 Response	Initiative Validation Rate
41 Substations	N/A	41 Substations	41 Substations	98%

AI-10 – 8.1.3.3.1 Supplemental Inspections – Hydrostations and Powerhouses – Non-Focus and Non-Field Verifiable

The substation supplemental (enhanced) inspection program is a comprehensive inspection of all the assets inside substations that are located within HFTD and HFRA areas. These inspections are designed to identify equipment issues and damage that may adversely impact reliable operations and/or pose an ignition risk. Supplemental substation inspections are performed in addition to the

routine inspections (GO 174) that are part of the maintenance practices described in PG&E's supplemental Equipment Maintenance Requirements Standard. The supplemental inspection program includes three methods of inspection: drone-based aerial inspection, ground-based visual inspection, and infrared inspection. These inspections are guided by digital checklists that align to the FMEA for substation structures, associated equipment and components. The information gathered from supplemental inspections may inform new programmatic responses including equipment replacements, improvements to maintenance policies, changes in the frequency of maintenance, or guidance clarifications.

The WMP set a target of 40 substation inspections in 2025. PG&E did not provide a risk reduction goal for this initiative. Data provided as part of the frontload request in spreadsheet format with 42 records. Records included, but were not limited to, fields such as facility type, facility name, area, HQ, and HFTD. There were also columns for Aerial General Conditions, Aerial Completion Validation, Ground General Conditions, Ground Completion Validation, and IR Inspection. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 10% Eyes-on-Risk achieved.

The IE requested inspection reports along with associated photos and work/repair orders where available in DR014. These reports were to be from each HFTD with five (5) from HFTD Tier 2 and 14 from HFTD Tier 3. PG&E responded by providing 57 PDF Files that included, but were not limited to, substation, inspector, date, and for IR inspections, issues. There were multiple IR inspection forms that listed Issues as "na". No explanation was provided for this. Furthermore, there were multiple aerial inspection forms that did not include the required gate photo but rather had a line diagram/as-built drawing of the substation instead. Lastly, two (2) Ground Completion Validation forms for Pit #5 Powerhouse were provided; one of these forms was labelled IR Inspections but was clearly not IR. Only aerial and ground inspection forms were provided for this hydrostation (resulting in a 98% sample validation rate). None of these discrepancies negate the fact that all inspections were performed for the substations provided as samples. PG&E needs to clarify what the "na" entries on the IR inspections forms means.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 15: Supplemental Inspections – Hydrostations and Powerhouses

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR014 Response	Initiative Validation Rate
40 Hydro Substations/ Powerhouses	N/A	41 Hydro Substations/ Powerhouses	42 Hydro Substations/ Powerhouses	101%

AI-11 – 8.1.5 Filling Asset Inventory Gaps – Non-Focus and Non-Field Verifiable

PG&E has significantly advanced data management practices and the quality of asset inventory over the last two years by applying ISO 55001 standards. PG&E uses several asset inventory and condition databases. Additional asset detail information may be stored in supplemental databases.

When Asset Registry errors or missing data (null fields) are identified through inspections and/or other processes, required changes to the asset records in GIS are evaluated and updated as appropriate via a standardized Map Corrections process.

The WMP set a target of listing targeted distribution and transmission equipment, populating missing age data in the Asset Registry, with a goal of 90% weighted average completeness across risk prioritized equipment. PG&E did not provide a risk reduction goal for this initiative. Data provided as part of the frontload request in spreadsheet format with 11 asset type records. Spreadsheet also contains amount of each asset type with a breakdown of assets with and without installation dates present at baseline (January 2024), filled since baseline, and endline (April 2025). The total number of assets, both distribution and transmission, across all 11 asset types is 5,294,800. At baseline, 4,672,350 assets had installation dates present. The remaining 622,450 assets had no installation date. Since the baseline, 11,555 assets received a backfilled installation date and another 329,552 assets received an approved, estimated age date. This brought the total number of assets with an installation date to 5,013,457 in April of 2025. This number represents approximately 94.70% of the total assets.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 16: 8.1.5 Filling Asset Inventory Gaps

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
List of targeted distribution and transmission equipment types. Baseline and actual rate of completeness for the “Installation Date” data element for each targeted distribution and transmission equipment type.	Population of missing age data in the Asset Inventory and Condition Database was completed to more than 90 percent weighted average across risk prioritized distribution and transmission equipment types.	N/A	94.70% Fill Rate	Not Applicable

GH-01 – 8.1.2.1 System Hardening – Distribution – Focus & Field Verifiable Filling

Distribution system hardening reduces wildfire ignition risk by increasing the resilience of overhead distribution assets located in High Fire Threat District and High Fire Risk Area portions of PG&E’s service territory. PG&E’s hardening approach includes undergrounding, covered conductor installation, line removal, and other system resilience mitigations. PG&E’s 2025 AIR states that its long-term grid resilience work focuses on hardening infrastructure in HFTD and HFRA areas and includes undergrounding, covered conductor installation, and line removal or remote grid conversions.

PG&E's 2025 WMP target for GH-01 was 520 circuit miles of distribution hardening. PG&E reported 539.01 circuit miles of distribution hardening in 2025 Q4 QDR, and 539.04 circuit miles reported in the 2025 AIR, exceeding the WMP target by 19.04 circuit miles, or approximately 4%. PG&E's AIR narrative states that the 2025 system hardening work included approximately 306 miles of system hardening undergrounding, 207 miles of overhead covered conductor, and 26 miles of line removal. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 5.31% achieved.

The IE reviewed PG&E-provided system hardening documentation, including the GH-01 completion data provided in DR002, and associated completion records workbook and as-built construction record PDF documents provided in DR022. The IE selected and reviewed a sample of 110 circuit miles for field verification. Field verification was performed using a vehicle-mounted 360-degree camera with GPS data logging, supported by comparison against PG&E-provided work order information, as-built records, GIS information, and available historical imagery.

During the field review, the IE verified completion of the sampled system hardening work, confirmed that reviewed installations aligned with the documented locations, and evaluated visible workmanship against the initiative description and applicable construction expectations. No discrepancies or workmanship issues were identified during the field validation process.

The 100% sample validation rate, applied to PG&E's reported 539.04 circuit miles, results in an initiative validation rate of approximately 104%, exceeding Energy Safety's 95% validation threshold. Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative

For illustrative examples of these observations, refer to Figure 3: Example System Hardening - Distribution Field Images.

Table 17: System Hardening - Distribution

2025 Target	2025 EC AIR	2025 Q4 QDR	DR022 Response	Initiative Validation Rate
520 Circuit Miles	539.01 Circuit Miles	539.01 Circuit Miles	539.04 Circuit Miles	104%

Figure 3:
Example System Hardening – Distribution Field Images



GH ID: [REDACTED]
Pad Mount Transformer T-
716449



GH ID: [REDACTED]
Primary UG to Secondary OH



Google Street View – 09/2024
GH ID: [REDACTED]
Circuit ID: 252691104



GIS Map View
GH ID: [REDACTED]
Circuit ID: 252691104



GH ID: [REDACTED]
360 Imagery Capture – 4/10/2026

GH-02 – 8.1.2.1 Evaluate Covered Conductor Effectiveness – Non-Focus and Non-Field Verifiable

Evaluating covered conductor effectiveness allows PG&E to incorporate accurate outage performance data into future system hardening planning efforts. PG&E’s 2023-2025 WMP established a 2025 target to update its covered conductor effectiveness calculation using 2024 outage data but did not set a risk reduction goal for this initiative.

According to PG&E’s 2025 EC AIR, the utility updated the covered conductor effectiveness calculation using the 2024 outage data, meeting its annual target. PG&E provided supporting documentation, including a whitepaper and effectiveness calculation data based on 2024 outage records. The report indicates that based on outage data from 2015-2022, analysis concluded that the estimated effectiveness of reducing ignition by covered conductor installation was 64%. In March of 2024, PG&E refreshed the analysis to include outage data from 2015-2023, which showed a marginal increase to 67%. In January of 2025, PG&E refreshed the analysis to include outage data from 2015-2024, which maintained overall effectiveness of 67%. The 2025 outage analysis expanded the outage drivers to make the analysis more granular. PG&E SMEs aligned outage drivers with the current Wildfire Distribution Risk Model, due to this there were 21 outage drivers in the 2025 analysis compared to 5 outage drivers in prior years.

Based on this analysis and the documentation reviewed, the IE has validated this initiative.

Table 18: Evaluate Covered Conductor Effectiveness

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Update the covered conductor effectiveness calculation using 2024 outage data.	Covered conductor effectiveness calculation updated using 2024 outage data.	Completed	Whitepaper summarizing covered conductor effectiveness calculation updated using 2024 outage data.	100%

GH-04 - 8.1.2.2 - 10K Undergrounding - Focus & Field Verifiable

PG&E's 10K Undergrounding initiative reduces wildfire ignition risk by converting overhead distribution conductor to underground facilities in areas where undergrounding provides long-term risk reduction benefits. Undergrounding reduces exposure to vegetation contact, conductor slap, equipment failure, and other overhead-system ignition drivers. It also supports wildfire-risk reduction by reducing the amount of energized overhead infrastructure located in High Fire Threat District and High Fire Risk Area portions of PG&E's service territory.

PG&E's 2025 WMP target for GH-04 was 330 circuit miles of 10K Undergrounding. PG&E reported 333.82 circuit miles of 10K Undergrounding in both the 2025 AIR and 2025 Q4 QDR, exceeding the WMP target by 3.82 circuit miles, or approximately 1%. The 2025 WMP target was therefore met. PG&E's reported risk reduction goal for this initiative was 3.50%. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 3.8% achieved.

The IE reviewed PG&E-provided undergrounding documentation, including the GH-04 completion data provided in DR002, and associated completion records workbook and as-built construction record PDF documents provided in DR024. The IE selected a sample of 98 circuit miles for field verification. Field verification was performed using vehicle-mounted 360-degree cameras with GPS data logging, and included review of undergrounding locations, visible underground equipment, overhead-line removal indicators where observable, construction completion evidence, restoration conditions, GPS/location consistency, and comparison against PG&E-provided source records.

During field review, the IE assessed whether the sampled locations supported completion of the reported undergrounding work and whether the visible field conditions aligned with PG&E's completion documentation. The IE also reviewed the relationship between GH-04 and GH-01 because undergrounding mileage may overlap with broader system hardening reporting. For this initiative, GH-04 was evaluated as the undergrounding-specific component, while GH-01 was evaluated as the broader system hardening initiative.

The 100% sample validation rate, applied to PG&E's reported 333.82 circuit miles, results in an initiative validation rate of approximately 101%, exceeding Energy Safety's 95% validation

threshold. Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative

For illustrative examples of these observations, refer to Figure 4: Example 10K Undergrounding Field Images.

Table 19: 10K Undergrounding

2025 Target	2025 EC AIR	2025 Q4 QDR	DR024 Response	Initiative Validation Rate
330 Circuit Miles	333.82 Circuit Miles	333.82 Circuit Miles	333.82 Circuit Miles	101%

Figure 4:
Example 10K Undergrounding Field Images



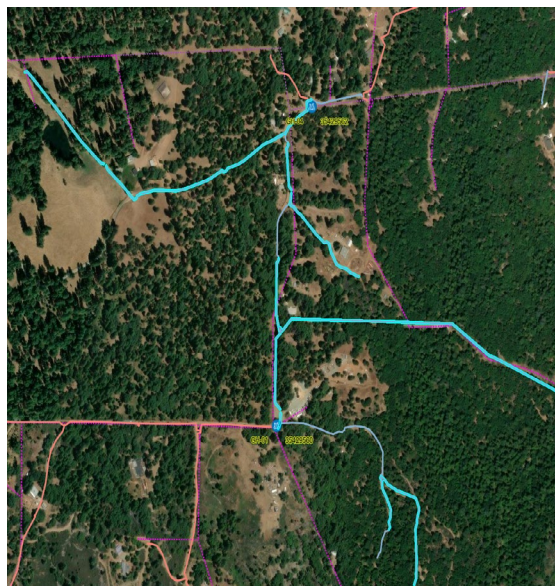
GH ID: [REDACTED]
Pad Mount Transformer J-8637



GH ID: [REDACTED]
Pad Mount Transformer T-79278



Google Street View – 9/2024
GH ID: [REDACTED]



GIS Map View
GH ID: [REDACTED]



GH ID: [REDACTED]
360 Video Capture – 4/18/2026

GH-05 - 8.1.2.5.1 – System Hardening - Transmission - Focus & Field Verifiable

Transmission system hardening reduces wildfire ignition risk by replacing, removing, or modifying transmission assets that may contribute to ignition potential in High Fire Threat District and High Fire Risk Area portions of PG&E's service territory. This initiative focuses on transmission conductor and related infrastructure improvements intended to reduce the likelihood of asset-related ignition and improve system resilience in elevated wildfire risk areas.

PG&E's 2025 WMP target for GH-05 was 5 circuit miles of transmission system hardening. PG&E reported 19.40 circuit miles of transmission system hardening in the 2025 Q4 QDR and 19.80 circuit miles in the 2025 AIR. The final AIR value exceeded the WMP target by 14.80 circuit miles, or approximately 296%. The 2025 WMP target was therefore met and exceeded. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of <1% achieved.

The IE reviewed PG&E-provided transmission system hardening documentation, including completion records, location data, circuit and structure information, construction records, and as-built documentation. As part of DR-025, the IE requested as-built records supporting the reported GH-05 completion mileage. PG&E provided the requested records, including the as-built documentation necessary to substantiate the full reported mileage. The documentation was sufficient to support the IE's review of the completed transmission hardening work and to reconcile the reported mileage against the final 2025 AIR value.

The Q4 QDR value of 19.40 circuit miles was used as the field verification planning baseline, while the 2025 AIR value of 19.80 circuit miles was used as the final EC-reported completion value. The 0.40 circuit-mile increase between the Q4 QDR and AIR values was reviewed as a post-Q4 utility-reported adjustment. Based on the complete data and supporting records provided, the IE was able to substantiate the full 19.80 circuit miles reported in the 2025 AIR.

The IE completed field verification of 100% of the GH-05 initiative. Field verification was conducted by aerial patrol from a PG&E-provided helicopter, which allowed the IE to observe the completed transmission hardening work across the applicable line segments. During the aerial verification, the IE reviewed the reported transmission hardening locations against PG&E's completion records, as-built documentation, and field-observed conditions.

During the field review, the IE verified completion of the transmission system hardening work, confirmed that the observed work aligned with PG&E's reported locations and completion documentation, and reviewed visible conditions for apparent construction or workmanship concerns. No field discrepancies or workmanship issues were identified during the aerial validation process.

The 100% sample validation rate, applied to PG&E's reported 19.80 circuit miles, results in an initiative validation rate of approximately 396%, exceeding Energy Safety's 95% validation threshold. Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 20: System Hardening - Transmission

2025 Target	2025 EC AIR	2025 Q4 QDR	DR025 Response	Initiative Validation Rate
5 Circuit Miles	19.8 Circuit Miles	19.4 Circuit Miles	19.8 Circuit Miles	396%

Figure 5:
Example System Hardening – Transmission Field ImagesETL. 3830 & 3820
Stanislaus-Melones SW Sta-
Manteca #1ETL. 3830 & 3820
Stanislaus-Melones SW Sta-
Manteca #1**GH-06 - 8.1.2.5.1 – System Hardening – Transmission Shunt Splices – Non-Focus & Field Verifiable**

Transmission shunt splice installation reduces wildfire ignition risk by improving the condition and reliability of transmission conductor connections. Shunt splices are installed to reinforce or bypass existing conductor splice locations where additional mechanical or electrical support is warranted. This work supports PG&E's broader transmission system hardening strategy by reducing the likelihood of conductor-related failure modes on transmission lines in elevated wildfire risk areas.

PG&E's 2025 WMP target for GH-06 was to install shunt splices on 25 transmission lines. PG&E reported shunt splice installations on 25 transmission lines in both the 2025 AIR and 2025 Q4 QDR. The reported 2025 completion value met the WMP target exactly; therefore, the target was

met based on PG&E's reported completion data. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 0.01% achieved.

The IE reviewed PG&E-provided transmission shunt splice documentation, including completion records, transmission line information, structure or span references, and supporting construction documentation. The documentation was reviewed to confirm that the reported work aligned with the GH-06 target and that the completed shunt splice work was associated with the transmission lines identified by PG&E.

The IE planned to validate 15 transmission lines for this initiative. Of the 15 planned lines, the IE was able to validate 14 lines through field verification, resulting in a 93% sample validation rate. Within the 14 validated lines, the IE confirmed 62 shunt splice locations. The remaining 11 circuits within the reported population were inaccessible during the field verification effort. The IE attempted access to 13 additional shunt splice locations across those 11 inaccessible circuits; however, access limitations prevented field validation of those locations.

During the field review, the IE verified completion of shunt splice installations on the 14 accessible transmission lines. The reviewed installations aligned with PG&E's reported line and location information, and no workmanship concerns were identified that affected validation of the observed work. GH-06 met PG&E's claimed production target, but the IE did not validate it at the required IE validation threshold. See Figure 7 for example field images.

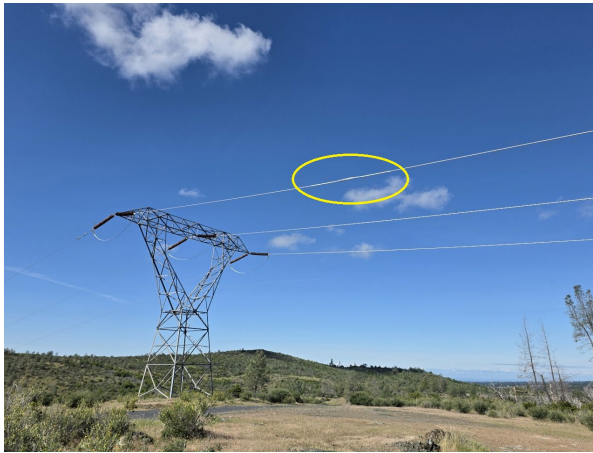
Based on the IE's review of PG&E-provided completion records, supporting documentation, field verification of 14 transmission lines, validation of 62 shunt splice locations, and documented access attempts for inaccessible locations, the IE finds that the initiative target was met by PG&E and that the available evidence provides high confidence in completion. However, because the IE was unable to field validate the full planned sample, the sample and corresponding initiative validation rate is 93%.

Table 21: System Hardening - Transmission Shunt Splice

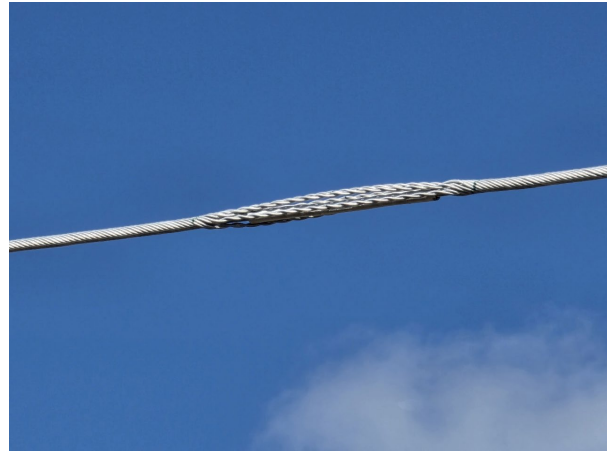
2025 Target	2025 EC AIR	2025 Q4 QDR	DR002 Response	Initiative Validation Rate
25 Transmission Lines	25 Transmission Lines	25 Transmission Lines	14 of 15 planned lines validated; 62 shunt splice locations verified	93% validation rate; high confidence in initiative completion

Figure 6:

Example System Hardening – Transmission Shunt Splice Field Images



Asset ID: 40867849
Circuit ID: ETL 4440



New Cable Shunt Splice

GH-10 - 8.1.2.10.5 – Non-Exempt Expulsion Fuse - Removal – Non-Focus & Field Verifiable

Non-exempt expulsion fuse removal reduces wildfire ignition risk by replacing or removing fuse equipment that may emit sparks, hot particles, or other ignition-capable material during operation. This initiative supports PG&E's broader grid mitigation strategy by reducing equipment-related ignition risk on distribution facilities located in High Fire Threat District and High Fire Risk Area portions of its service territory.

PG&E's 2025 WMP target for GH-10 was to remove non-exempt expulsion fuses from 1,400 fuse locations. PG&E reported removal of non-exempt expulsion fuses from 1,451 locations in both the 2025 AIR and 2025 Q4 QDR, exceeding the WMP target by 51 fuse locations, or approximately 4%. PG&E's reported completion included 770 line fuses and 681 equipment fuses. PG&E also reported that 14 remaining line fuse locations were carried into 2026 due to external factors. The 2025 WMP target was therefore met and exceeded. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 0.27% achieved.

The IE reviewed PG&E-provided non-exempt expulsion fuse removal documentation, including completion records, fuse location data, structure information, and supporting work documentation alongside the CalFire 2022 Powerline Equipment Identification Pocket Guide v2. The records were reviewed to confirm that the reported removals aligned with the GH-10 target and that the completed work was associated with fuse locations identified by PG&E. The documentation provided was sufficient to support sample selection and field verification.

The IE selected a field verification sample of 160 fuse locations, including 99 HFTD Tier 3 devices, 48 HFTD Tier 2 devices, and 13 non-HFTD locations. Field verification focused on confirming that the non-exempt expulsion fuse equipment had been removed, replaced with exempt equipment, or otherwise mitigated consistent with the initiative objective. The IE reviewed

visible field conditions, location consistency, structure information, and supporting completion records to determine whether the sampled work supported PG&E's reported completion of the initiative.

During field review, the IE verified completion of the sampled non-exempt expulsion fuse removals. The reviewed locations aligned with PG&E's reported fuse location and structure information, and the field observations supported the reported completion of the initiative. No field discrepancies or workmanship concerns were identified that affected validation of the sampled fuse removal work. The IE did identify one collateral field observation involving a slack communications guy wire attached to a reviewed structure. The guy wire appears to be associated with attached communications facilities and will require remediation by the applicable communications provider. This observation was not related to the GH-10 fuse removal scope and did not affect the IE's validation of PG&E's reported completion for this initiative. See Figure 8 for example field images and Figure 9 for the collateral communications guy wire observation.

Based on the IE's review of PG&E-provided completion records, supporting documentation, and field verification of the selected sample, the IE has validated this initiative. The verified sample supports PG&E's reported completion of 1,451 non-exempt expulsion fuse removals. The 100% sample validation rate, applied to PG&E's reported 1,451 fuse removals, results in an initiative validation rate of approximately 104%, exceeding Energy Safety's 95% validation threshold.

Table 22: Non-Exempt Expulsion Fuse - Removal

2025 Target	2025 EC AIR	2025 Q4 QDR	DR002 Response	Initiative Validation Rate
1,400 Fuse Locations	1,451 Fuse Locations	1,451 Fuse Locations	1,451 Fuse Locations	104%

Figure 7:
Example Non-Exempt Expulsion Fuse Removal Field Images



GH ID: [REDACTED]
Circuit ID: 153661104
HFTD Class: Tier-3
Fuse Type: Siemens Fusesaver



GH ID: [REDACTED]
Circuit ID: 182742104
HFTD Class: Tier-2
Fuse Type: SMU-20E

Figure 8:
Communication Guy Wire Field Images



GH ID: [REDACTED]
Circuit ID: 103221101



Condition: Slack
Communications Guy Wire

GH-11 – 8.1.2.5.1 System Hardening – Transmission Conductor Segment Replacement – Non-Focus and Field Verifiable

Transmission conductor segment replacement reduces wildfire ignition risk by replacing targeted transmission conductor segments where existing conductor conditions, line configuration, or other risk-informed factors support replacement as a wildfire mitigation measure. This initiative is part of PG&E's broader transmission system hardening program and supports ignition risk reduction by improving the reliability and condition of transmission assets located in High Fire Threat District and High Fire Risk Area portions of PG&E's service territory.

PG&E's 2025 WMP target for GH-11 was to replace conductor segments on 2 transmission lines. PG&E reported conductor segment replacement on 2 transmission lines in both the 2025 AIR and 2025 Q4 QDR. The reported 2025 completion value met the WMP target exactly; therefore, the target was met. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of <1% achieved.

The IE reviewed PG&E-provided transmission conductor segment replacement documentation, including completion records, line information, conductor segment limits, structure or span references, and supporting construction documentation. The records were reviewed to confirm that the completed work aligned with the GH-11 target and that the reported conductor segment replacements were associated with the transmission lines identified by PG&E. The documentation provided was sufficient to support sample selection and field verification.

The IE selected both reported conductor segment replacement locations for field verification, representing 100% of the reported initiative population. Field verification focused on confirming that the reported conductor segment replacement work had been completed and that observed field conditions aligned with PG&E's completion records, structure information, and conductor segment limits.

During field review, the IE verified completion of the reported conductor segment replacement work. The reviewed locations aligned with PG&E's reported line and location information, and field observations supported the reported completion of the initiative. No field discrepancies or workmanship concerns were identified that affected validation of the work. See Figure 10 for example field images.

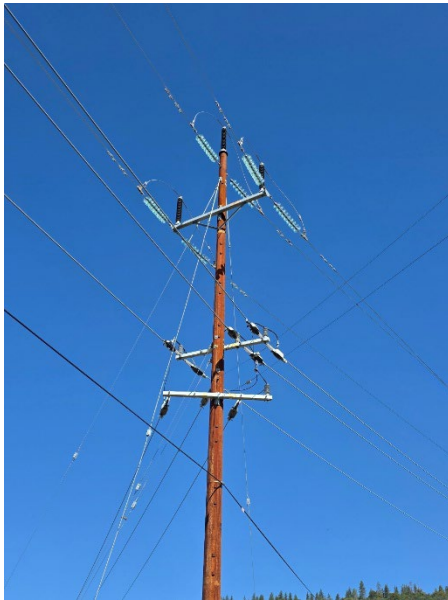
Based on the IE's review of PG&E-provided completion records, supporting documentation, and field verification of 100% of the reported population, the IE has validated this initiative. The verified sample supports PG&E's reported completion of conductor segment replacement on 2 transmission lines. The 100% sample validation rate, applied to PG&E's reported 2 transmission lines, results in an initiative validation rate of 100%, meeting Energy Safety's 95% validation threshold.

Table 23: System Hardening - Transmission Conductor Segment Replacement

2025 Target	2025 EC AIR	2025 Q4 QDR	DR002 Response	Initiative Validation Rate
2 Transmission Lines	2 Transmission Lines	2 Transmission Lines	2 Transmission Lines	100%

Figure 9:

Example Transmission Conductor Segment Replacement Field Images



GH ID:
Circuit: Volta-South 60KV



GH ID:
Circuit: Gold Hill #1 60 KV

GM-01 – 8.1.6.1 Asset Inspections - Quality Assurance – Focus and Non-Field Verifiable

Quality assurance (QA) audits validate asset inspection results to ensure compliance, accuracy, and adherence to established inspection standards. PG&E's 2023-2025 WMP established specific 2025 QA targets for two distinct asset inspection programs.

PG&E set a 2025 target of conducting 500 quality assurance audits for transmission inspections, with an expected quality pass rate of 95%. No specific risk reduction goal was established for this initiative. According to PG&E's 2025 EC AIR, the utility completed QA audits at 1,783 transmission inspection locations with an overall pass rate of 100%, exceeding both the number of target audits and pass rate. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of not applicable.

In addition, PG&E set a 2025 target of conducting 1,500 quality assurance audits for distribution inspections, with an expected quality pass rate of 95%. According to PG&E's 2025 EC AIR, the utility completed QA audits at 1,871 distribution inspection locations with an overall pass rate of 99.83%, exceeding both the number of target audits and pass rate.

PG&E provided detailed documentation through Excel spreadsheets titled "PGE_GM-01_TRANS_RESPONSE_ATCH002_CONF" which listed 1,783 audit locations and "PGE_GM-01_DIST_RESPONSE_ATCH001_CONF" which listed 1,871 audit locations. Data for both transmission and distribution audits included asset identifiers, inspection and audit dates, findings, critical findings, and associated documentation links.

In data request DR033, the utility was asked to provide PDF QA reports for the 133 sample inspections, consisting of 13 from non-HFTD, 26 from Tier 2-HFTD and 94 from Tier 3-HFTD with an even spread between transmission and distribution audits. The utility provided individual PDF reports for all 133 audits. These reports included asset details which included, but not limited to, QA Specialist, QA Audit Type, Compliance Inspection MAT Code, Inspection Lot, SAP Equipment ID #, Compliance Inspector LAN ID, Supervisor LAN ID, and Supervisor Name. The reports also include Observations and SME Review details. The IE reviewed the sampling data and identified no issues or discrepancies.

Based on this analysis and the documentation reviewed, the IE has validated this initiative.

Table 24: Asset Inspections - Quality Assurance

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR029 Response	Initiative Validation Rate
Transmission Inspections – HFTD/HFRA: 500 audit locations*, 95% pass rate.	Transmission Inspections - 1,783 Inspected, 1,783 Passed = 100% Pass Rate	Transmission Inspections - 1,783 Inspected, 1,783 Passed = 100% Pass Rate	Transmission Inspections - 1,783 Inspected, 1,783 Passed = 100% Pass Rate	357%
Distribution Inspections – HFTD/HFRA: 1,500 Audit locations*, 95% pass rate.	Distribution Inspections - 1,871 Inspected, 1778 Passed = 99.83% Pass Rate	Distribution Inspections - 1,871 Inspected, 1778 Passed = 99.83% Pass Rate	Distribution Inspections - 1,871 Inspected, 1778 Passed = 99.83% Pass Rate	125%

GM-03 – 8.1.7.2 HFTD/HFRA Open Tag Reduction – Distribution Backlog – Non-Focus and Non-Field Verifiable

PG&E began the Wildfire Safety Inspection Program (WSIP) to proactively expand inspections of poles and associated equipment in HFTD/HFRA areas on an accelerated and enhanced bases to mitigate ignition risk. The WSIP inspections led to a significant increase in the volume of

notifications. There were approximately 260,000 notifications in distribution HFTD/HFRA backlog at the end of 2022. Most of the outstanding tags were priority E and F tags, representing conditions considered to have a moderate or low potential safety or reliability impact, respectively. PG&E described how work orders are prioritized based on risk, the risk-informed plan for eliminating the backlog of ignition-risk tags in the HFTD/HFRA, and analysis of open work orders.

The WMP set a target of closing at least 25,000 notifications created in HFRA/HFTD locations in addition to 25,000 other notifications. PG&E estimated the risk reduction from this initiative would be less than 1%. The spreadsheet provided in the frontload request contains 270,385 records. Of these, 100,391 records had a blank Asset ID field. Other fields for the remaining records included, but were not limited to, Asset Location, Circuit ID, Line Class, Description of Work, Field Notes, HFTD Class, Start Date, and End Date. Filtering by tags with a completion end date of 2025 resulted in 127,291 items, verifying PG&E's claim in the Q4 QDR. Of these 127,291 tags, 65,020 were listed as yes in the "January 5 Population" and therefore classified as backlog. 125,040 of the 127,291 tags were from HFTD Tier 2, 3, or Zone 1. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 0.38% achieved.

When the End Date column was filtered for 2025 and the Status column simultaneously filtered for completed records, there were 87,575. This is more than the minimum 50,000 completed notification backlog tags set as target.

The IE requested documentation of completion for Open Tag Reductions. The documentation was to include three (3) non-HFTD locations, seven (7) HFTD Tier 2 locations, and 25 HFTD Tier 3 locations. PG&E responded by providing 34 PDF files, 3 Order Cancellation Request Forms, 3 Contractor Face Sheets, 3 O-Calc GO 95 forms, and 24 EH Overhead Tag Forms. Of the OH Tag Forms 22 were completed while the other 2 were cancelled. The contractor Face Sheets were completed, and the Cancellation Request Forms were cancelled. No information on completeness could be determined from the O-Calc GO 95 forms provided.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 25: HFTD/HFRA Open Tag Reduction – Distribution Backlog

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload & DR030 Response	Initiative Validation Rate
Close at least 25,000 additional EC notifications on top of closing an equivalent number of EC notification created in HFRA/HFTD locations in 2025.	N/A	127,291 Closed Tags	127,291 Closed Tags	255%

GM-06 – 8.1.2.10.1 EPSS – Down Conductor Detection (DCD) – Non-Focus and Field Verifiable

Down Conductor Detection (DCD) supports PG&E's Enhanced Powerline Safety Settings (EPSS) program by enabling protective devices to detect conditions associated with downed conductors and initiate protective action intended to reduce ignition risk. This initiative is designed to reduce the likelihood that a downed or faulted conductor remains energized in High Fire Threat District (HFTD) and High Fire Risk Area (HFRA) portions of PG&E's service territory.

PG&E's 2025 WMP target for GM-06 was to install or make capable 250 DCD protective devices. PG&E reported 518 DCD protective devices in the 2025 Q4 QDR and 494 DCD protective devices in the 2025 AIR. The final AIR value exceeded the WMP target by 244 devices, or approximately 98%. The 2025 WMP target was therefore met and exceeded. The decrease from 518 devices in the Q4 QDR to 494 devices in the AIR represents a post-Q4 reporting adjustment and was reviewed as part of the IE's source-control reconciliation. Additionally, the IE noted that DR002 included 517 DCD device records, one fewer than the 518 devices reported in the 2025 Q4 QDR. This one-record difference was treated as a data reconciliation item and did not affect the IE's validation of the final AIR-reported completion value. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 0.79% achieved.

The IE reviewed PG&E-provided DCD documentation, including device records, location data, protective device identifiers, and supporting information showing that the reported devices were DCD-capable. Because DCD capability is not fully verifiable through visual field observation alone, the IE's review included both field verification of protective device locations and document-based review of device capability, settings, or commissioning evidence.

The IE selected a field verification sample of 40 device locations, including 17 HFTD Tier 3 devices, 13 HFTD Tier 2 devices, and 10 non-HFTD devices. Field verification focused on confirming the presence and location of sampled protective devices and comparing observed field conditions against PG&E's reported device and location records. Document review focused on confirming that the sampled devices were included in PG&E's DCD-capable device population and supported the reported completion value. See Figure 11 for example field images.

During field verification, the IE identified one location data discrepancy within the non-HFTD sample. Asset ID 43214988 was identified in the source data as an overhead location with work completed on January 9, 2025; however, the field review identified a discrepancy requiring documentation in the exception record. See Figure 12.

The identified discrepancy did not affect validation of the sampled work. The Q4 QDR-to-AIR reduction, as well as the one-record difference between the 2025 Q4 QDR value and the DR002 record count, were noted as data reconciliation items but did not affect the IE's validation of the final AIR-reported completion value.

Based on the IE's review of PG&E-provided completion records, supporting device documentation, and verification of the selected sample, the IE has validated this initiative. The

verified sample supports PG&E's reported completion of 494 DCD protective devices. The 100% sample validation rate, applied to PG&E's reported 494 devices, results in an initiative validation rate of approximately 198%, exceeding Energy Safety's 95% validation threshold.

Table 26: EPSS - Down Conductor Detection (DCD)

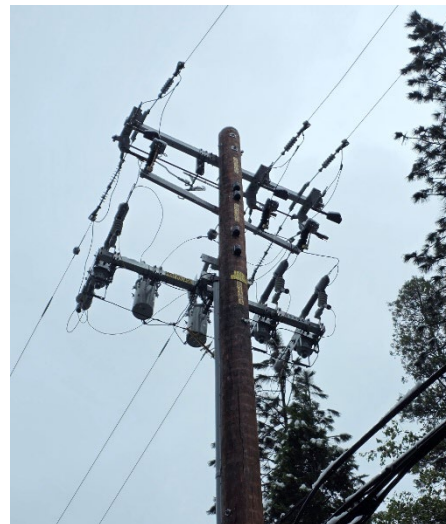
2025 Target	2025 EC AIR	2025 Q4 QDR	DR002 Response	Initiative Validation Rate
250 DCD Protective Devices	494 DCD Protective Devices	518 DCD Protective Devices	517 DCD Protective Devices	198%

Figure 10:

Example EPSS – Down Conductor Detection (DCD) Field Images



Asset ID: 45720750
Circuit ID: 254421101
HFTD Class: Tier-2
Image Date: 4/10/2026



Asset ID: 45837817
Circuit ID: 152762101
HFTD Class: Tier-3
Image Date: 4/12/2026

Figure 11:
Example EPSS – Down Conductor Detection (DCD) Field Images – Data Discrepancy



Deficiency: Potential Incorrect Location
Asset ID: [REDACTED]
Circuit ID: [REDACTED]
GPS Coordinates: [REDACTED]

Image Source: Google Maps
Image Date: September 2018

DR-002 - GM-06 - EPSS - Down Conductor Detection (DCD)

Table

Edit

Get directions

Zoom to

HFTD Class	Non-HFTD
Asset ID	[REDACTED]
Asset Location	Overhead
Circuit ID	[REDACTED]
Date End	1/9/25, 8:00 AM
Date Start	1/9/25, 8:00 AM
GH Status	Complete
Description of Work	protective device controller or relay device installation
Evaluation_Date	4/9/26, 2:22 PM
Line Class	Primary Distribution Line
Line Deenergized	Yes
WMP Activity	Grid Design and System Hardening
WMP Initiative	Grid Design_Operations_and Maintenance

GIS Data provided by PG&E in DR002

GM-07 – 8.1.8.1.1 Update on EPSS Reliability Study – Non-Focus and Non-Field Verifiable

GM-07 outlines PG&E’s commitment to provide an updated Enhanced Powerline Safety (EPSS) Reliability Impact Study. This study evaluates the operational performance and reliability effects of enabling EPSS on distribution and transmission line protective devices. EPSS is a protective technology that allows line protection devices to address faults of varying magnitude and rapidly de-energize the line. Circuits with EPSS are configured to clear high-current bolted fault conditions at 100 milliseconds or less. EPSS settings allow circuit breakers and reclosers to clear faults beyond fuses. EPSS settings help protect customers and communities from potential ignitions that could result in wildfires.

According to PG&E’s 2025 EC AIR, the utility submitted its reliability study to Energy Safety on February 28, 2025, as well as a narrative companion document titled “2026 WMP Commitment GM-07 (EPSS Reliability Study) & ACI PG&E-25U-06 – Evaluation and Reporting of Safety Impacts Relating to EPSS: Narrative.” The IE was able to confirm this submission through Energy Safety’s e-filing website.

Based on this analysis and the documentation reviewed, the IE has validated this initiative.

Table 27: Update on EPSS Reliability Study

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Provide annually an updated Enhanced Powerline Safety Settings (EPSS) reliability impact study per Areas for Continued Improvement (ACI)	Reliability study submitted to Energy Safety on February 28, 2025.	Completed	Reliability study submitted to Energy Safety on February 28, 2025	100%

GM-09 – 8.1.6.2 Asset Inspections - Quality Control – Focus and Non-Field Verifiable

Quality assurance (QC) audits validate asset inspection results to ensure compliance, accuracy, and adherence to established inspection standards. PG&E’s 2023-2025 WMP established specific 2025 QA targets for two distinct asset inspection programs.

PG&E set a 2025 target of conducting 17,450 quality control audits for transmission inspections, with an expected quality pass rate of 95%. No specific risk reduction goal was established for this initiative. According to PG&E’s 2025 Q4 QDR and 2025 AIR, the utility completed QC audits at 19,842 transmission inspection locations with an overall pass rate of 99.99%, exceeding both the target audits and pass rate. PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of not applicable.

In addition, PG&E set a 2025 target of conducting 170,000 quality control audits for distribution inspections, with an expected quality pass rate of 95%. According to PG&E’s 2025 Q4 QDR and

2025 AIR, the utility completed QC audits at 177,742 distribution inspection locations with an overall pass rate of 99.92%, exceeding both the target audits and pass rate.

PG&E provided detailed documentation through Excel spreadsheets entitled “PGE_GM-09_20260316_AUDIT_Q001_ATCH026_BCONF” which listed 19,842 audit locations and “PGE_GM-09_20260316_AUDIT_Q001_ATCH027_BCONF” which listed 177,742 audit locations. Data for both transmission and distribution audits included asset identifiers, inspection and audit dates, findings, critical findings, and associated documentation links.

In data request DR033, the utility was asked to provide PDF reports for the 138 sample inspections, consisting of 14 from non-HFTD, 27 from Tier 2-HFTD and 97 from Tier 3-HFTD, evenly split between transmission and distribution systems. The utility provided individual PDF reports for all 138 audits. These reports included an audit summary to include Select Audit Program, Audit Scope, QC Audit Type, Inspection Start Date, and Submitter. The reports also include inspection details including Inspection Lot, SAP Equipment ID #, Compliance Inspection Date, Compliance Inspector LAN ID, Compliance Inspector Name, HFTD Region, HFRA, PG&E Region, Main Work Center, Line Name, Structure Number, and Inspection Record. The IE did not find any discrepancies between the frontload data and the individual QC reports.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 28: Asset Inspections - Quality Control

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR033 Response	Initiative Validation Rate
Transmission Inspections – HFTD/HFRA: 17,450 audit locations*, 95% pass rate.	Transmission Inspections – 19,842 Inspected, 99.99% Pass Rate	Transmission Inspections – 19,842 Inspected, 99.99% Pass Rate	Transmission Inspections – 19,842 Inspected, 99.99% Pass Rate	114%
Distribution Inspections – HFTD/HFRA: 170,000 Audit locations*, 95% pass rate.	Distribution Inspections – 177,742 Inspected, 99.92% Pass Rate	Distribution Inspections – 177,742 Inspected, 99.92% Pass Rate	Distribution Inspections – 177,742 Inspected, 99.92% Pass Rate	105%

4.1.2.2 Funding Verification – Findings

AI-01 – Retainment of Inspectors and Internal Workforce Development

Strategic Overview and Risk Mitigation

This initiative involved PG&E’s plan development to increase retention over time for trained and qualified inspectors and to focus on increasing and sustaining a consistent, year-over-year internal

workforce that builds on existing experience and mentors new employees for asset inspections. PG&E set a target for 2025 to develop a plan to increase retention for inspectors and develop a plan to focus on increasing and sustaining an internal workforce. PG&E did not provide a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met its 2025 target and reported completion of activities intended to improve the quality of asset inspections and reduce reliance on contractors performing distribution HFTD ground inspections. The initiative implemented a multi-year resource plan that increased permanent compliance inspector staffing by 74 inspectors and improved overall employee tenure within the organization.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

AI-02 – Detailed Inspection Transmission - Ground

Strategic Overview and Risk Mitigation

This initiative involved detailed ground inspections of transmission structures. PG&E set a target of 22,000 structures inspected in 2025 and stated “TBD” as a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$8,500,000
- Actual Expenditure: \$5,801,000
- Variance: -\$2,699,000 (32% Underrun)
- PG&E Justification: The EC AIR states that early training completions and favorable weather allowed inspections to take place earlier than anticipated, leading to resource optimization and lower unit cost. PG&E was asked to provide rationale regarding how these factors resulted in a lower unit cost and if they anticipate this in future cycles. PG&E stated that they attributed lower unit costs to the early mobilization of contracted inspection resources, which allowed inspections to begin earlier, improve work sequencing, and increase operational efficiency through more effective resource utilization. PG&E noted that these efficiencies may not continue in future cycles due to variability in mobilization

and execution timing. PG&E also stated that while updates were incorporated into the 2026-2028 WMP forecasting methodology, these changes reflect a broader set of planning considerations and not solely the 2025 cost experience.

Operational Impact and Risk Reduction

PG&E exceeded the 2025 target by completing ground inspections for 24,033 structures. Although PG&E did not establish risk reduction goal for this initiative, the ground inspections of transmission facilities directly support effective long-term wildfire risk mitigation.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The underrun was attributed to lower unit costs resulting from the early mobilization of contracted inspection resources, which improved inspection sequencing, operational efficiency, and overall resource utilization.

AI-04 – Detailed Inspection Transmission - Aerial

Strategic Overview and Risk Mitigation

This initiative involved detailed aerial inspections of transmission structures. PG&E set a target of 19,000 structures inspected in 2025 and stated “TBD” as a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$22,591,000
- Actual Expenditure: \$16,584,000
- Variance: -\$6,007,000 (27% Underrun)
- PG&E Justification: The underrun reflected lower unit costs realized during execution, including efficiencies gained through transitioning to unitized cost structures, which were incorporated into updated forecasting methodologies and monthly forecast adjustments. PG&E noted, however, that underlying cost pressures remain elevated due to increasing contract rates, higher internal labor costs, and the transition toward more expensive U.S.-manufactured drones driven by potential FAA restrictions. As a result, the underrun was not viewed as a long-term reduction in baseline costs, and future forecasts were adjusted to account for these ongoing cost pressures.

Operational Impact and Risk Reduction

PG&E exceeded the 2025 target by completing aerial inspections for 23,519 structures. Although PG&E did not establish risk reduction goal for this initiative, the aerial inspections of transmission facilities directly support effective long-term wildfire risk mitigation.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The underrun was driven by lower unit costs and efficiencies achieved through the transition to unitized cost structures during execution. PG&E noted that future cost pressures, including higher contract rates,

labor costs, and increased use of more expensive U.S.-manufactured drones, are expected to offset these savings going forward.

AI-05 – Detailed Inspection Transmission - Climbing

Strategic Overview and Risk Mitigation

This initiative involved detailed climbing inspections of transmission structures. PG&E set a target of 1,200 structures inspected in 2025 and stated “TBD” as a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$1,751,000
- Actual Expenditure: \$3,033,000
- Variance: \$1,282,000 (73% Overrun)
- PG&E Justification: The EC AIR states that operational circumstances required adding units to the workplan, engaging more resources, resulting in higher unit costs. PG&E was asked to provide a rationale for adding units to the workplan versus just completing the WMP target. In addition, PG&E was asked if the higher unit cost was only for units in the added scope or did it affect all units. PG&E stated that additional units were added to the workplan based on findings from Compliance and Operational Assurance (COA) processes, resulting in an expanded scope of work. PG&E also noted that increased unit costs were driven not only by the additional scope, but also by COA-related reinspection activities and the prioritization of completion timelines, which increased overall year-end unit costs.

Operational Impact and Risk Reduction

PG&E exceeded the 2025 target by completing climbing inspections for 1,873 structures. Although PG&E did not establish risk reduction goal for this initiative, the climbing inspections of transmission facilities directly support effective long-term wildfire risk mitigation.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The overrun was driven by an expanded scope of work resulting from COA findings, along with increased unit costs associated with reinspection activities and accelerated completion timelines.

AI-06 – Perform Transmission Infrared (IR) Inspections

Strategic Overview and Risk Mitigation

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 6.

AI-07 – Detailed Ground & Aerial Inspections - Distribution

Strategic Overview and Risk Mitigation

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 6.

AI-08 – Supplemental Inspections – Substation Distribution**Strategic Overview and Risk Mitigation**

This initiative involved comprehensive inspection of all the assets inside distribution substations that are located within HFTD and HFRA areas. PG&E set a target of 78 substation inspections in 2025 and stated “TBD” as a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$2,702,000
- Actual Expenditure: \$1,854,000
- Variance: -\$848,000 (31% Underrun)
- PG&E Justification: The 2025 EC AIR states that process improvements reduced the need for overtime, double-time, travel and lodging, and full-time employees. PG&E was asked to provide information regarding what specific process improvements led to this increased efficiency. PG&E stated that the inspection tool that they utilize (AtomicMAPS) was able to make some updates that helped the inspector workflow allowing for quicker inspections, mainly around ease-of-use and search ability in the app.

Operational Impact and Risk Reduction

PG&E met the 2025 target by completing 78 substation inspections. Although PG&E did not establish risk reduction goal for this initiative, the distribution substation inspections directly support effective long-term wildfire risk mitigation.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets. The underrun was attributable to inspection tool updates that increased inspection efficiency.

AI-09 – Supplemental Inspections – Substation Transmission**Strategic Overview and Risk Mitigation**

This initiative involved comprehensive inspection of all the assets inside transmission substations that are located within HFTD and HFRA areas. PG&E set a target of 41 substation inspections in 2025 and stated “TBD” as a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$1,701,000
- Actual Expenditure: \$2,660,000
- Variance: \$959,000 (56% Overrun)
- PG&E Justification: PG&E states that they erroneously underfunded this activity during budget-setting; however, PG&E identified the error in January and continued to execute the work in alignment with its WMP commitment.

Operational Impact and Risk Reduction

PG&E met the 2025 target by completing 41 substation inspections. Although PG&E did not establish risk reduction goal for this initiative, the transmission substation inspections directly support effective long-term wildfire risk mitigation.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets. The overrun resulted from an error during the budget-setting process in which the activity was underfunded yet implementation of work continued.

AI-10 – Supplemental Inspections – Hydroelectric Substations & Powerhouses

Strategic Overview and Risk Mitigation

This initiative involved comprehensive inspection of all the assets inside hydroelectric substations and powerhouses that are located within HFTD and HFRA areas. PG&E set a target of 40 substation inspections in 2025 and stated “TBD” as a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$2,150,000
- Actual Expenditure: \$1,037,000
- Variance: -\$1,113,000 (52% Underrun)
- PG&E Justification: The 2025 EC AIR states that process improvements drove efficiencies. PG&E was asked to provide information regarding what specific process improvements led to this increased efficiency. PG&E stated that the inspection tool that they utilize (AtomicMAPS) was able to make some updates that helped the inspector workflow allowing for quicker inspections, mainly around ease-of-use and search ability in the app.

Operational Impact and Risk Reduction

PG&E exceeded the 2025 target by completing 41 hydroelectric substation and powerhouse inspections. Although PG&E did not establish risk reduction goal for this initiative, the hydroelectric substation and powerhouse inspections directly support effective long-term wildfire risk mitigation.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The underrun was attributable to inspection tool updates that increased inspection efficiency.

AI-11 – Filling Asset Inventory Data Gaps (Obj.)

Strategic Overview and Risk Mitigation

This initiative involved using a standardized Map Corrections process to review and update GIS asset records when inspections or other processes identified Asset Registry errors or missing data fields. PG&E set a target of listing targeted distribution and transmission equipment, populating

missing age data in the Asset Registry, with a goal of 90% weighted average completeness across risk prioritized equipment. PG&E did not provide a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$2,500,000
- Actual Expenditure: \$686,000
- Variance: -\$1,814,000 (73% Underrun)
- PG&E Justification: The 2025 EC AIR states that PG&E pivoted from manual install date collection to using estimated ages. PG&E was asked to provide confirmation and rationale that this switch to age estimation has not resulted in a quality loss. PG&E stated that the AI-11 initiative exceeded its 90% asset age data completeness target through the use of an estimated age model, achieving results beyond what manual methods alone were expected to deliver. PG&E also noted that the 2023–2025 AI-11 cost experience is not directly comparable to the 2026–2028 ES-02 forecasting methodology due to changes in program objectives, testing methods, and forecasting approaches.

Operational Impact and Risk Reduction

PG&E met the 2025 target by confirming that the population of missing age data in the Asset Inventory and Condition Database was completed to more than 90% weighted average across risk prioritized distribution and transmission equipment types. Although PG&E did not establish risk reduction goal for this initiative, their implementation of this initiative supports progress toward wildfire mitigation objectives.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The underrun was driven by the successful use of an estimated age model that enabled PG&E to exceed its asset age data completeness target more efficiently than anticipated, reducing reliance on more resource-intensive manual methods.

GH-01 – System Hardening – Distribution

Strategic Overview and Risk Mitigation

This initiative involved overhead system hardening, undergrounding of distribution lines, and removal of existing overhead lines within HFTD, HFRA, and associated buffer zones. PG&E set a target to complete 520 circuit miles of system hardening work, aiming to achieve a 4.70% risk reduction goal.

Financial Performance Analysis

- Planned Budget: \$248,940,000
- Actual Expenditure: \$283,952,000
- Variance: \$35,012,000 (14% Overrun)
- PG&E Justification: PG&E states that they hardened a greater number of overhead circuit miles than they had budgeted.

Operational Impact and Risk Reduction

PG&E completed 539.01 circuit miles of system hardening work, exceeding operational targets, thus achieving the stated 4.70% risk reduction goal.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The reported overrun was attributable to hardening a greater number of circuit miles than budgeted.

GH-02 – Evaluate Covered Conductor Effectiveness

Strategic Overview and Risk Mitigation

This initiative involved evaluating covered conductor effectiveness in order to incorporate accurate outage performance data into future system hardening planning efforts. PG&E set a target to update its covered conductor effectiveness calculation using 2024 outage data but did not set a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met the intent of this initiative by updating its covered conductor effectiveness analysis using 2024 outage data and achieving its annual target. Supporting documentation showed that estimated ignition reduction effectiveness increased from 64% to 67% after incorporating updated outage data through 2023, with the 2025 analysis maintaining 67% effectiveness while expanding outage driver categories from 5 to 21 to better align with the current Wildfire Distribution Risk Model.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

GH-04 – 10K Undergrounding

Strategic Overview and Risk Mitigation

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 6.

GH-05 – System Hardening – Transmission

Strategic Overview and Risk Mitigation

This initiative involved transmission conductor replacement projects focusing on the risk associated with transmission line conductor failure which may lead to wildfire ignition. PG&E set a target to remove or replace 5 circuit miles of transmission conductor, aiming to achieve <1% risk reduction goal.

Financial Performance Analysis

- Planned Budget: \$21,517,000
- Actual Expenditure: \$9,331,000
- Variance: -\$12,186,000 (57% Underrun)
- PG&E Justification: The 2025 EC AIR states that reduced costs for work at Foresthill Substation eliminated the need for ~\$10m of primary generation. PG&E was asked to provide detail on what specifically was eliminated at Foresthill that resulted in this saving. In addition, PG&E was asked to confirm and provide rationale that the reduction in costs/work did not result in quality loss and if they anticipate this moving to future cycles. PG&E stated that the project construction sequence initially required a large-scale generation effort at Foresthill Substation and that working with Operations and System Protection, they were able to coordinate a switching configuration and adjoining protection scheme that prevented the need for temporary generation, resulting in no reduction in work and no quality loss. PG&E also stated that they do not anticipate the need for temporary generation and that the need is determined on a project-by-project basis.

Operational Impact and Risk Reduction

PG&E completed 19.8 circuit miles of transmission conductor removal or replacement, exceeding its operational targets and achieving the initiative's stated risk reduction goal of less than 1%.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The underrun was driven by the elimination of approximately \$10 million in temporary generation costs at Foresthill Substation after PG&E coordinated an alternative switching configuration and protection scheme with Operations and System Protection.

GH-06 – System Hardening – Transmission Shunt Splices

Strategic Overview and Risk Mitigation

This initiative involved installing shunt splices on existing transmission lines to help eliminate single points of failure, reducing ignition risks associated with splice-related equipment issues. PG&E set a target to install shunt splices on 25 transmission lines and stated "TBD" as a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$4,374,000
- Actual Expenditure: \$3,573,000

- Variance: -\$801,000 (18% Underrun)
- PG&E Justification: The 2025 EC AIR states that PG&E pivoted from external contractors to internal M&C crews resulting in savings. PG&E was asked if they always had the internal capability to perform this work and what factors led PG&E to switch from external to internal crews. PG&E stated that they have historically had the internal capability to perform this work and the switch from external to internal crews was a cost savings initiative piloted in 2025 and fully implemented in 2026. PG&E also stated that their internal crews have the same credentials as the external crews, thus no quality impact loss from this switch.

Operational Impact and Risk Reduction

PG&E met its target goal by completing the installation of shunt splices on 25 transmission lines. Although PG&E did not establish risk reduction goal for this initiative, their implementation of this initiative supports progress toward wildfire mitigation objectives.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets. The underrun was driven by PG&E's transition from external contractors to internal crews as part of a cost savings initiative piloted in 2025. PG&E stated that internal crews already possessed the necessary capabilities and credentials, resulting in cost savings without any reduction in work quality.

GH-08 – Surge Arrestor - Removals

Strategic Overview and Risk Mitigation

This initiative involved the removal of surge arrestors. PG&E had no specific Wildfire Mitigation Plan (WMP) target for surge arrestor removals in 2025; therefore, no direct risk reduction commitment was documented.

Financial Performance Analysis

Although this initiative is not identified with targets in PG&E's Q4 QDR Table 1, it was shown to be included in the financial tables from Q4 QDR Table 11. Since the initiative was identified in Q4 QDR Table 11 and the absolute percent difference between budgeted and actual for this item is greater than 10%, the WMP Planned Spend (\$) and EC-Claimed Actual Spend (\$) and % from budget) are as follows:

- Planned Budget: \$800,000
- Actual Expenditure: \$1,868,000
- Variance: \$1,068,000 (134% Overrun)
- PG&E Justification: It was noted that the 2025 WMP did not list a target for GH-08. PG&E was asked how the budget was determined for this initiative without having a stated target. PG&E was also asked to provide details on the work performed that resulted in these costs including numerical population of surge arresters needing QC and documented remediation and what led to the need for rework and why it was not captured initially. PG&E stated that the 2025 GH-08 budget supported quality assurance, documentation remediation, and closeout activities for previously installed surge arresters. In 2025, the program completed

QA and documentation remediation for more than 69,000 surge arrester locations, including validation of installation records and correction of documentation gaps to ensure accurate records and proper project closeout.

Operational Impact and Risk Reduction

Although direct 2025 risk reduction was not quantified, the initiative supports broader long-term wildfire mitigation objectives. Completing these removals maintained the previously established benefits of system protection and risk mitigation.

Assessment and Conclusion

PG&E effectively completed this initiative, although no target for 2025 was provided. The underrun was associated with QA, documentation remediation, and closeout activities for previously installed surge arresters, including validation and correction of records for more than 69,000 locations to ensure accurate documentation and project closeout.

GH-10 – Non-Exempt Expulsion Fuse - Removal

Strategic Overview and Risk Mitigation

This initiative involved reducing the consequence of potential ignitions by replacement and/or removal of non-exempt expulsion fuses. PG&E set a target to remove non-exempt expulsion fuses/cutouts from approximately 1,400 fuse locations identified on distribution poles, aiming to achieve <1% risk reduction goal.

Financial Performance Analysis

- Planned Budget: \$5,485,000
- Actual Expenditure: \$8,200,000
- Variance: \$2,715,000 (49% Overrun)
- PG&E Justification: The 2025 EC AIR states that PG&E only had 848-line fuses to remove due to overperformance in previous years, therefore removing 681 equipment fuses to meet the WMP target. PG&E stated that additional units were added to the workplan post-budget-setting to meet the WMP target. PG&E was asked for clarification if the original budget was based on the number of remaining line fuses for removal and to explain why the equipment fuses were not factored into the original budget. PG&E clarified that the original 2025 budget was based solely on the remaining 848 non-exempt line fuse locations identified for removal, as equipment fuses were outside the program's original scope and therefore not included in the budget. Due to prior overperformance and work completed through other programs, PG&E added approximately 700 equipment fuses to the 2025 workplan after budget development in order to achieve the full WMP target of 1,400 fuse removals.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by removing non-exempt expulsion fuses from 1,451 locations, thus achieving the <1% risk reduction goal.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets. The overrun was driven by the addition of approximately 700 equipment fuses to the 2025 workplan after budget development in order to meet the WMP target of 1,400 fuse removals, as the original budget only accounted for the remaining non-exempt line fuses within the initial program scope.

GH-11 – System Hardening – Transmission Conductor Segment Replacement

Strategic Overview and Risk Mitigation

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 6.

GM-01 – Asset Inspections – Quality Assurance

Strategic Overview and Risk Mitigation

This initiative involved quality assurance audits of transmission and distribution asset inspections to ensure compliance, accuracy, and adherence to established inspection standards. PG&E set targets of 500 transmission audit locations (95% pass rate) and 1,500 distribution audit locations (95% pass rate). PG&E did not provide a specific risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$5,068,000
- Actual Expenditure: \$4,527,000
- Variance: -\$541,000 (11% Underrun)
- PG&E Justification: The 2025 EC AIR states that resource optimization and early scheduling reduced overtime, double-time, and contractor costs. PG&E was asked what specific resource optimization led to this increased efficiency. PG&E stated that they achieved resource optimization through earlier work planning and scheduling, improved alignment of internal resources with WMP commitments, and onboarding additional internal personnel. These efforts reduced reliance on contractors while minimizing overtime and double-time costs through improved workload distribution and resource availability.

Operational Impact and Risk Reduction

PG&E exceeded operational targets, completing QA audits at 1,783 transmission inspection locations with an overall pass rate of 100%, and completing QA audits at 1,871 distribution inspection locations with an overall pass rate of 99.83%. Although direct numerical risk reduction was not assigned, robust quality assurance directly supports effective long-term wildfire risk mitigation.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The underrun was driven by resource optimization efforts, including earlier work planning and scheduling, better

alignment of internal resources with WMP commitments, and the addition of internal personnel, which reduced reliance on contractors and lowered overtime and double-time costs.

GM-02 – HFTD/HFRA Open Tag Reduction - Transmission

Strategic Overview and Risk Mitigation

This initiative involved completing all open work orders for ignition-related notifications in HFTD and HFRA. PG&E had no specific Wildfire Mitigation Plan (WMP) target for open tag reduction in 2025; therefore, no direct risk reduction commitment was documented.

Financial Performance Analysis

Although this initiative is not identified with targets in PG&E's Q4 QDR Table 1, it was shown to be included in the financial tables from Q4 QDR Table 11. Since the initiative was identified in Q4 QDR Table 11 and the absolute percent difference between budgeted and actual for this item is greater than 10%, the WMP Planned Spend (\$) and EC-Claimed Actual Spend (\$) and % from budget) are as follows:

- Planned Budget: \$839,000
- Actual Expenditure: \$655,000
- Variance: -\$184,000 (22% Underrun)
- PG&E Justification: The 2025 EC AIR states that PG&E completed the work with fewer labor hours than planned. The 2025 WMP did not list a target for this initiative. PG&E was asked to provide reasoning why no target was provided and to provide the total number of tags closed for 2025. In addition, PG&E was asked to explain what specific factors led to fewer labor hours being required to complete this work. PG&E stated that the reported numbers for GM-02 are for distribution substation HFTD corrective tags and are not associated with GM-02. No target for closed tags was provided because the initiative was completed in 2023, with a limited number of tags carried over into 2024 due to external factors, thus the reason for no targets for subsequent years.

Operational Impact and Risk Reduction

Without a specified 2025 target, quantifying immediate risk reduction impact is challenging. Nonetheless, completing all open work orders in HFTD and HFRA enhances system protection and supports wildfire risk mitigation efforts.

Assessment and Conclusion

Although direct 2025 risk reduction was not quantified, the initiative supports broader long-term wildfire mitigation objectives. The underrun was driven by fewer labor hours being required for remaining corrective tag work associated with distribution substation HFTD tags, as the GM-02 initiative had largely been completed in 2023, with only a limited number of carryover tags addressed in subsequent years.

GM-03 – HFTD/HFRA Open Tag Reduction – Distribution Backlog**Strategic Overview and Risk Mitigation**

This initiative involved reducing the wildfire risk associated with the backlog of ignition-risk tags in HFTD/HFRA. PG&E set a target to close at least 25,000 additional EC work orders on top of closing 25,000 work orders created in HFTD/HFRA locations (PG&E stated they expected to close 63,747 in 2025), aiming to achieve <1% risk reduction goal.

Financial Performance Analysis

- Planned Budget: \$600,000
- Actual Expenditure: \$532,000
- Variance: -\$68,000 (11% Underrun)
- PG&E Justification: PG&E completed the work with lower unit costs than planned.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by closing 127,291 work orders, thus achieving the <1% risk reduction goal.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The reported underrun was attributable to lower unit costs for completed work.

GM-06 – System Hardening – Transmission Conductor Segment Replacement**Strategic Overview and Risk Mitigation**

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 6.

GM-07 – Update on EPSS Reliability Study**Strategic Overview and Risk Mitigation**

This initiative involved PG&E's commitment to provide an updated Enhanced Powerline Safety (EPSS) Reliability Impact Study on an annual basis. This study evaluates the operational performance and reliability effects of enabling EPSS on distribution and transmission line protective devices. PG&E did not establish a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as "PCC Costs" (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this

initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met its operational goal by submitting its reliability study to Energy Safety on February 28, 2025, as well as a narrative companion document titled “2026 WMP Commitment GM-07 (EPSS Reliability Study) & ACI PG&E-25U-06 – Evaluation and Reporting of Safety Impacts Relating to EPSS: Narrative.”

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

GM-09 – Asset Inspections – Quality Control

Strategic Overview and Risk Mitigation

This initiative involved quality control audits of transmission and distribution asset inspections to ensure compliance, accuracy, and adherence to established inspection standards. PG&E set targets of 17,450 transmission audit locations (95% pass rate) and 170,000 distribution audit locations (95% pass rate). PG&E did not provide a specific risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$21,250,000
- Actual Expenditure: \$17,373,000
- Variance: -\$3,877,000 (18% Underrun)
- PG&E Justification: The 2025 EC AIR states that resource optimization and early scheduling reduced overtime, double-time, and contractor costs. PG&E was asked to explain what specific resource optimization led to this increased efficiency. PG&E stated that the increased efficiency resulted from earlier work planning and scheduling, better alignment of internal resources with forecasted WMP commitments, and onboarding additional internal personnel. These measures improved workload distribution and resource availability, reducing reliance on contractors as well as overtime and double-time labor costs.

Operational Impact and Risk Reduction

PG&E exceeded operational targets, completing QC audits at 19,842 transmission inspection locations with an overall pass rate of 99.99%, and completing QC audits at 177,742 distribution inspection locations with an overall pass rate of 99.92%. Although direct numerical risk reduction was not assigned, robust quality assurance directly supports effective long-term wildfire risk mitigation.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The underrun was driven by increased operational efficiency achieved through earlier work planning and scheduling, improved alignment of internal resources with WMP commitments, and onboarding additional

internal personnel, which reduced contractor reliance and lowered overtime and double-time labor costs.

4.1.3 Synthesis of Findings

4.1.3.1 Initiative Review

All 19 initiatives within the Grid Design, Operations, and Maintenance category met or exceeded their 2025 WMP targets, representing 100% target achievement. Notable overperformances include GH-05 (Transmission System Hardening) exceeding its target by 296%, GM-06 (Down Conductor Detection) by 98%, and AI-07 (Detailed Ground Inspection) by 15%. The single exception was GH-06 (Transmission Shunt Splice Installation), which achieved a 93% validation rate due to field access limitations affecting 11 of 25 transmission lines; however, PG&E met its stated target of 25 lines, and the IE validated 62 individual shunt splice locations, providing high confidence in completion despite access constraints.

All three substation inspection initiatives (AI-08, AI-09, AI-10) exhibited recurring documentation anomalies including missing required gate photos, unexplained "na" entries in IR inspection forms, and asset substitution errors (wrong substation forms provided in sampling). While these errors did not negate the fact that inspections were performed, they indicate quality control gaps in documentation that could obscure more significant issues in larger sample sizes.

During field audits, the IE found zero workmanship issues across 110 distribution hardening circuit miles, 98 undergrounding circuit miles, 19.80 transmission hardening circuit miles, 160 fuse removal locations, and 2 transmission conductor segment replacements, indicating effective construction standards and adequate contractor oversight.

4.1.3.2 Funding Verification

Budget and Expenditure Summary: The Grid Design, Operations, and Maintenance category had a total planned budget of \$1,637,738,000 with actual expenditures of \$1,644,879,000, representing a .44% variance above budget. The category's overall expenditure remained within 10% of the planned budget.

Initiatives with Significant Variances: Of the 24 total initiatives in this category, 16 (66.67%) had absolute percent differences exceeding 10%. Several initiatives demonstrated significant financial variances warranting additional review.

- AI-05 Detailed Inspection Transmission – Climbing represented one of the largest overruns within the inspection portfolio. The expanded work scope resulted from COA findings that required additional climbing inspections, reinspection activities, and accelerated completion timelines. Despite the increased expenditures, PG&E substantially exceeded its operational target by completing 1,873 inspections compared to the original target of 1,200 structures.
- AI-11 Filling Asset Inventory Data Gaps demonstrated a significant underrun, although the variance reflected a successful process improvement rather than reduced implementation. PG&E transitioned from labor-intensive manual install date collection methods to an estimated age model, enabling the company to exceed the 90% asset age completeness

target more efficiently than anticipated. PG&E indicated that this revised methodology improved scalability and reduced reliance on manual resource-intensive processes without negatively affecting data quality objectives.

- GH-01 System Hardening – Distribution represented the largest overrun by dollar value among the reviewed initiatives. PG&E exceeded the operational target by completing 539 circuit miles of system hardening work compared to the planned 520 circuit miles. The increased expenditures were directly tied to expanded hardening activities and achievement of the initiative’s wildfire risk reduction objectives.
- GH-05 System Hardening – Transmission represented one of the largest underruns. Through coordination with Operations and System Protection, PG&E eliminated the need for temporary generation infrastructure at Foresthill Substation by implementing alternative switching and protection configurations. Importantly, PG&E confirmed that the reduced costs did not result in reduced work quality or diminished wildfire mitigation performance.
- GM-01 and GM-09 demonstrated a broader organizational trend toward resource optimization and increased use of internal personnel. Both initiatives achieved operational targets with significantly reduced overtime, contractors, and double-time labor costs through earlier scheduling, workforce alignment, and expanded internal staffing capacity.

Key Trends and Funding Compliance: Several important trends emerged throughout the funding verification review.

- Operational efficiencies and process optimization were primary drivers of underruns across multiple initiatives. Earlier mobilization of inspection resources, improved scheduling practices, enhanced workflow software functionality, unitized cost structures, and increased reliance on internal personnel consistently reduced labor, contractor, travel, and overtime costs while maintaining or improving operational performance.
- PG&E demonstrated a broader strategic shift toward internal workforce development and reduced contractor reliance. AI-01 Retainment of Inspectors and Internal Workforce Development increased permanent compliance inspector staffing by 74 positions, while multiple initiatives cited onboarding additional internal personnel as a key factor supporting operational efficiency and cost reductions. GH-06 specifically illustrated a deliberate transition from external contractors to qualified internal crews as part of a long-term cost savings initiative.
- Several overruns resulted from expanded work scope or evolving operational priorities rather than deficiencies in implementation. AI-05, GH-01, and GH-10 all experienced increased expenditures because PG&E expanded activities beyond original budget assumptions to address additional inspection findings, harden additional circuit miles, or incorporate equipment outside the original program scope. In most cases, these expanded activities directly supported achievement or overachievement of wildfire mitigation objectives.
- The review identified examples where budgeting assumptions did not fully align with evolving operational conditions. AI-09 demonstrated how an underfunded budget required continued implementation despite insufficient initial allocations, while GH-10 reflected

scope expansion after prior-year overperformance altered remaining program needs. These examples suggest that certain initiatives required mid-cycle adjustments to accommodate changing implementation realities.

The documentation reviewed generally supports that PG&E maintained funding compliance and continued to align expenditures with wildfire mitigation objectives. Variances were consistently supported by operational explanations, implementation changes, or documented efficiency gains. Across nearly all reviewed initiatives, PG&E met or exceeded operational targets despite significant budget variances, and there was limited evidence that reduced expenditures negatively impacted wildfire mitigation effectiveness, inspection quality, or system hardening outcomes.

4.2 VEGETATION MANAGEMENT AND INSPECTIONS

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.2.1 Initiative Summary Table

Table 29: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ⁹	Sample Validation Rate (%) ^{10 11}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{12 13}	WMP – Planned Spend (\$) ¹⁴	EC-Claimed Actual Spend (\$ and % from budget) ¹⁴	Satisfied Risk Reduction Goal? ¹⁵
VM-01, 8.2.2.1.1, LiDAR Data Collection – Transmission	17,500 Circuit Miles of LiDAR Inspection	17,954 Circuit Miles of LiDAR Inspection	Complete	35 Circuit Miles	100%	LiDAR Inspection List (Frontload Data) 35 Circuit Miles of Attestations (DR045)	103%	\$6,409	\$11,044 (72.3%)	N/A
VM-02, 8.2.3.1, Pole Clearing Program	2025 pole count to be adjusted by the ending pole population in the previous year (2024) poles per Vegetation Control Standard TD-7112S will be inspected, cleared, and maintained where clearing is necessary. (77,376 Poles based on refreshed asset registry prior to work beginning)	80,301 Poles Cleared	Complete	138 Poles	100%	Pole Clearing Work Log (Frontload Data) 138 Pole Clearing Records (DR046)	75% ¹⁶	\$27,363	\$32,851 (20.1%)	Yes <1%
VM-03, 8.2.2.2.5, Focused Tree Inspection (FTI) Program	1,500 Circuit Miles of Focused Tree Inspections	1,531 Circuit Miles of Focused Tree Inspections	Complete	35 Inspections	97%	Focused Tree Inspection List (Frontload Data) 35 FTI Records (DR047)	102%	\$183,964	\$101,900 (-44.6%)	Yes <1%

⁹ N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

¹⁰ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

¹¹ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

¹² The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.

¹³ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.

¹⁴ For entries with “Not Reported on Table 4 of the 2025 EC AIR,” the IE requested more information in DR005. PG&E informed the IE that these initiatives are considered “Provider Cost Center (PCC) Costs” and deal with qualitative initiative work and PG&E does not track specific costs for these initiatives to report on.

¹⁵ “No Goal Provided” is listed when the 2023-2025 WMP does not contain any information on % Risk Impact (% Risk Reduction Goal or TBD or N/A). “TBD” and “N/A” are entries that PG&E utilizes for certain initiative’s % Risk Impact and is not an IE determination, but rather a determination made by PG&E.

¹⁶ Although all sampling data was validated, the data provided by PG&E indicates that 5,961 poles were marked as “constrained” and 14,772 poles were marked as “no work” resulting in a 75% initiative validation rate. (60,396 * 1 / 80,301 = .7521 * 100 = 75.21%) See Section 4.2.2.1, Initiative Review for VM-02.



Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ⁹	Sample Validation Rate (%) ^{10, 11}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{12, 13}	WMP – Planned Spend (\$) ¹⁴	EC-Claimed Actual Spend (\$ and % from budget) ¹⁴	Satisfied Risk Reduction Goal? ¹⁵
VM-04, 8.2.2.2.4, Tree Removal Inventory	25,000 Trees Mitigated	31,311 Trees Mitigated	Complete	138 Trees	100%	Tree Removal Inventory List (Frontload Data) 138 Tree Records (DR048)	127%	\$70,386	\$29,429 (-58.2%)	Yes <1%
VM-05, 8.2.2.3.1, Defensible Space Inspections – Distribution Substation	131 Substation Defensible Space Inspections	130 Substation Defensible Space Inspections	Complete	67 Substations	100%	Distribution Substation Inspection List (Frontload Data) 67 Substation Records (DR049)	99%	\$2,200	\$2,113 (-4.0%)	Yes 53% Eyes-On
VM-06, 8.2.2.3.1, Defensible Space Inspections – Transmission Substation	55 Substation Defensible Space Inspections	55 Substation Defensible Space Inspections	Complete	21 Substations	100%	Transmission Substation Inspection List (Frontload Data) 21 Substation Records (DR050)	100%	\$1,211	\$1,271 (5.0%)	Yes 22% Eyes-On
VM-07, 8.2.2.3.1, Defensible Space Inspections – Hydroelectric Substations and Powerhouses	61 Defensible Space Inspections	58 Defensible Space Inspections	Complete	22 Substations	100%	Hydroelectric Substation & Powerhouses List (Frontload Data) 22 Substation Records (DR051)	95%	\$1,550	\$1,503 (-3.0%)	No 25% Eyes-On
VM-08, 8.2.5, Vegetation Management – Quality Assurance	Distribution: 2,862 audit locations; 95% pass rate Transmission: 1,374 audit locations; 95% pass rate Vegetation Control Pole Clearing: 2,061 audit locations; 95% pass rate	Distribution: 4,101 audit locations; 99.92% pass rate Transmission: 2,042 audit locations; 99.99% pass rate Vegetation Control Pole Clearing: 2,647 audit locations; 100% pass rate	Complete	47 Distribution 46 Transmission 45 Pole Clearing	100%	QA Distribution Audit List QA Transmission Audit List QA Pole Clearing Audit List (Frontload Data) 138 Inspection Audit Records (DR052)	Distribution – 143% Transmission – 149% Pole Clearing – 128%	\$10,283	\$9,495 (-7.7%)	N/A
VM-09, 8.2.6, Constraint Resolution Procedural Guideline	Process of Centralizing Constraints Resolution	Completion of constraint resolution procedural guidelines	Complete	N/A	N/A	Constraint Resolution Procedural Guidelines Completion Report (DR003 Remaining Frontload Data)	100% ¹⁷	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	No Goal Provided
VM-13, 8.2.2.1.1, Routine Ground – Transmission	17,740 Circuit Miles of Ground Inspections	17,953 Circuit Miles of Ground Inspections	Complete	35 Circuit Miles	100%	Transmission Routine Ground Inspection List (Frontload Data) 35 Circuit Miles of Inspection Records (DR054)	101%	\$24,797	\$27,553 (11.1%)	Yes 100% Eyes-On
VM-14, 8.2.2.1.2, Transmission Second Patrol	5,625 Circuit Miles of Second Patrol Inspections	6,058 Circuit Miles of Second Patrol Inspections	Complete	34 Circuit Miles	100%	Transmission Second Patrol Inspection List (Frontload Data) 34 Circuit Miles of Inspection Records (DR056)	108%	\$1,152	\$1,872 (62.5%)	Yes 100% Eyes-On

¹⁷ Refer to Section 4.2.2.1, Initiative Review for VM-09 for more information on how the initiative was validated.

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ⁹	Sample Validation Rate (%) ^{10, 11}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{12, 13}	WMP – Planned Spend (\$) ¹⁴	EC-Claimed Actual Spend (\$ and % from budget) ¹⁴	Satisfied Risk Reduction Goal? ¹⁵
VM-15, 8.2.2.1.3, Integrated Vegetation Management – Transmission	6,504 Acres of Vegetation Management Inspections	6,504 Acres of Vegetation Management Inspections	Complete	34 Acres	100%	VM-15 Execution Summary (Frontload Data) 8 Attestations (34 Acres) (DR056)	102%	\$15,524	\$13,682 (-11.9%)	TBD
VM-16, 8.2.2.2.1, Distribution Routine Patrol	78,200 Circuit Miles of Routine Patrol Inspections	78,438 Circuit Miles of Routine Patrol Inspections	Complete	138 Circuit Miles	100%	Distribution Routine Patrol Inspection List (Frontload Data) 138 Circuit Miles of Inspection Records (DR057)	100%	\$745,303	\$885,992 (18.9%)	Yes <1%
VM-17, 8.2.2.2.2, Distribution Second Patrol	25,685 Circuit Miles of Second Patrol Inspections	25,704 Circuit Miles of Second Patrol Inspections	Complete	35 Circuit Miles	100%	Distribution Second Patrol Inspection List (Frontload Data) 35 Circuit Miles of Inspection Records (DR058)	100%	\$124,040	\$143,387 (15.6%)	Yes <1%
VM-18, 8.2.2.2.3, VM for Operational Mitigations (VMOM)	6,500 Trees Mitigated	8,165 Trees Mitigated	Complete	34 Trees	100%	One VM Tree Mitigations Log (Frontload Data) 34 Tree Records (DR059)	126%	\$9,681	\$11,328 (17.0%)	TBD
VM-22, 8.2.5.2, Vegetation Management - Quality Control	Distribution: 85,000 audit locations; 95% pass rate Transmission: 14,500 audit locations; 95% pass rate Vegetation Control Pole Clearing: 12,500 audit locations; 95% pass rate	Distribution: 90,164 audit locations; 99.45% pass rate Transmission: 15,675 audit locations; 99.76% pass rate Vegetation Control Pole Clearing: 13,312 audit locations; 99.45% pass rate	Complete	46 Distribution 47 Transmission 45 Pole Clearing	100%	QC Distribution Audit List QC Transmission Audit List QC Pole Clearing Audit List (Frontload Data) 138 Inspection Audit Records (DR060)	Distribution – 105% Transmission – 108% Pole Clearing – 106%	\$26,602	\$24,483 (-8.0%)	N/A



4.2.2 Written Detail for Initiatives

4.2.2.1 Initiative Review – Findings & Method

VM-01 – 8.2.2.1.1 LiDAR Data Collection - Transmission – Non-Focus and Non-Field Verifiable

LiDAR data collection for the transmission system supports accurate vegetation management by identifying vegetation encroachments and facilitating timely mitigation. PG&E’s 2023-2025 WMP set a 2025 target to collect LiDAR data for 17,500 circuit miles of the transmission system and no specific risk reduction goal was identified. According to the 2025 Q4 QDR, PG&E collected LiDAR data for 17,954 circuit miles, exceeding its annual target.

In support of VM-01, PG&E provided an Excel spreadsheet titled “PGE_VM-01_20260316_AUDIT_Q001_ATCH037” which shows a total of 1,395 points equaling 17,728 attestation miles. A separate table titled “VM-13 Required Inputs” is provided which shows a total of 17,954 miles in a column titled “VM-01 Final Execution Mileage” which matches PG&E’s claimed amount for 2025.

In data request DR045, the utility was asked to provide a sample of approximately 35 circuit miles of LiDAR data collection which consisted of approximately 3 from non-HFTD, 7 from Tier 2-HFTD and 25 from Tier 3-HFTD. The utility provided a LiDAR attestation titled “PGE_DR-045_20260424_RESPONSE_Q001_ATCH001_CONF” which showed the sample mileage throughout the document highlighted in yellow. This document is 23 pages in length and was provided by the LiDAR vendor NV5. The IE was able to track the circuit names with associated circuit mileage in order to confirm that there were no discrepancies between the sampling data provided and the frontload data received.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 30: LiDAR Data Collection - Transmission

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR045 Response	Initiative Validation Rate
17,500 Circuit Miles	N/A	17,954 Circuit Miles	Attestation Mileage/ Sampling Data Circuit Miles	103%

VM-02 – 8.2.3.1 Pole Clearing Program – Focus and Non-Field Verifiable

PG&E performs removal/clearing of vegetation around select Transmission and Distribution poles and towers in accordance with PRC Section 4292, to maintain a firebreak of at least 10 ft in radius out from the pole up to 8 ft up from the ground per Title 14 CCR 12554. These requirements apply in the State Responsibility Area (SRA) during designated fire season. Additional firebreaks are maintained at non-SRA, non-Federal Responsibility Area (FRA) poles in areas of HFTD and

PG&E's HFRTA for conformance with PUC 8386. These additions are based on PG&E guidance(risk reduction work) or through local agreements. The locations are intended to reduce risk, improve access to equipment, allow for safe Supervisory Control and data Acquisition operations, enhance public safety, supplement other mitigations, and protect assets from wildfires regardless of cause at equipment locations.

The 2025 WMP set forth a target that 2025 pole count will be adjusted by the ending pole population in the previous year (2024) and that poles per Vegetation Control Standard TD-7112S will be inspected, cleared, and maintained where clearing is necessary. According to the 2025 EC AIR, PG&E set a target of 77,376 poles for 2025 based on refreshed asset registry prior to work commencement. PG&E set a risk reduction goal of <1%. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 0.11% achieved. Data provided in the frontload request consisted of a spreadsheet including information such as project name, pole location, pole name (including pole #), clear status, pole comments, and clear date. There were 82,498 records and when filtered by on 2025 work plan and added pole 2025, 80,301 poles are listed, matching PG&E's claimed amount in the EC AIR. Poles are marked as completed, completed (partial refusal), completed (pending 1254c), constrained, and no work. Poles marked as completed (partial refusal) include comments pertaining to any clearance work done and context for partial refusal. Examples of partial refusal include: homeowner does not want (x type of tree) cut, property access refusal, only clear outside of fence, customer does not want cleared, etc. Poles marked as completed, pending 1254c, are poles where there is pending tree work that can only be conducted by a Tree Crew. Poles marked as no work often contain a comment stating "rated low risk on vc fire matric in RR no clearing required," Poles marked as constrained receive a case number, associated pole number, and include constraint comments which are generally full access interference. Below is a breakdown of poles completed with reported status:

- Completed: 47,608
- Completed, Partial Refusal: 3,510
- Completed, Pending 1254c: 9,278
- Constrained: 5,961
- No Work: 14,772

It should be recognized that PG&E is counting constrained and no work poles toward completion of total poles cleared. While risk-based prioritization that excludes low-risk locations from clearing requirements represents appropriate resource allocation, the current reporting approach obscures the distinction between completed risk mitigation activities and administrative completions, potentially overstating risk reduction achieved and complicating year-over-year performance comparisons when "no work" or "constrained" pole percentages change due to factors unrelated to actual clearing activity levels. Counting "no work" and "constrained" poles toward the completion target inflates activity metrics without corresponding risk reduction.

The IE requested documentation of completion for pole clearing items in DR045. The data request specified 14 non-HFTD samples, 27 HFTD Tier 2 samples, and 97 HFTD Tier 3 samples. PG&E responded by providing a spreadsheet that included project region, project division, pole name, pole HFTD, lat/lon, project number, and initial clear work status. Cross referencing the samples

provided to the requested list confirms the proper number of poles for each HFTD was provided. The IE reviewed the sampling data and identified no issues or discrepancies.

OEIS issued a Notice of Violation (NOV) to PG&E on August 7, 2025, regarding pole clearance around pole ID120511951. The violation was considered “Moderate” risk due to the presence of dry grass. At the time of this writing, PG&E has not responded to the NOV.

Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative. PG&E should revise completion counting methodology and reporting practices to separate “work completed” from “assessed and no work required,” enhancing transparency on actual risk mitigation activities versus locations where assessment determined clearing was unnecessary. PG&E should also revise the target and section 8.2.3.1 to draw distinction between a pole clearing completion target versus a pole assessment target. This approach will improve clarity on actual risk mitigation activities versus administrative completions, enabling more accurate year-over-year performance comparisons and understanding of program effectiveness. The defining narrative provided in the WMP should be decisive on how PG&E will meet their goal.

Table 31: Pole Clearing Program

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR046 Response	Initiative Validation Rate
77,376 Poles	80,301 Poles	81,129 Poles	60,396 Poles	75%

VM-03 – 8.2.2.2.5 Focused Tree Inspections (FTI) Program – Non-Focus and Non-Field Verifiable

PG&E has conducted a county-by-county review with regional SMEs to better focus VM efforts to address high risk areas that have experienced higher volumes of vegetation damage during PSPS events, outages, and/or ignitions. This information has been used to develop polygons where focused vegetation inspections can be evaluated to determine appropriate counties to prioritize pilot(s).

The WMP set a target of 1,500 circuit miles of FT inspections in 2025. PG&E set a risk reduction goal of <1%. PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 0.11% achieved. Data provided in the frontload request consisted of a spreadsheet with 35,421 records. Records included information such as project region, project division, project name, project program, project year, span ID, miles, lat/lon, and status. The 35,421 records totaled ~1,586 circuit miles of inspections. The data included a value for “CountedTowardsTarget” which was populated with “yes,” “no,” or “pending QC.” When filtered by the yes value, the data indicated 1,531 circuit miles of FT inspections in 2025, matching the claimed amount in the Q4 QDR.

The IE requested inspection reports as well as associated photos and work/repair orders associated with the items in the frontload request in DR047. Three (3) of these samples were to be from non-HFTD, seven (7) from HFTD Tier 2, and 25 from HFTD Tier 3. PG&E responded by providing a spreadsheet with information such as project region, project division, project name, project program, project year, lat/lon, prescription status, and species. All records had a status of either “completed” or “inspected, no work”. There were 585 records in this spreadsheet with 28 unique

project numbers, matching the sampling request with the exclusion of project number OneVM-061970 which was not provided in the sampling data.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 32: Focused Tree Inspections (FTI) Program

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR047 Response	Initiative Validation Rate
1,500 Circuit Miles	N/A	1,531.32 Circuit Miles	1,531 Circuit Miles	102%

VM-04 – 8.2.2.2.4 Tree Removal Inventory – Focus and Non-Field Verifiable

Tree removals identified from the legacy Enhanced Vegetation Management (EVM) program reduce wildfire ignition risks by proactively addressing hazardous vegetation. PG&E’s 2023-2025 WMP set a 2025 target to mitigate 25,000 trees identified from the legacy EVM program. According to the 2025 Q4 QDR, PG&E claimed 31,702 trees removed which was later updated to the total of 31,311 trees removed in the 2025 EC AIR, still exceeding the annual target. PG&E set a risk reduction goal of <1%. PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 1.81% achieved.

In support of VM-04, PG&E provided an Excel spreadsheet titled “PGE_VM-04_20260316_AUDIT_Q001_ATCH040” which contained a list of 31,702 trees. This spreadsheet contains details such as Region, Division, County, VASA_CPZNAME, Circuit Name, Tree Category, and Completion Date. 12,433 of the trees contained a value of “tree worked” under the tree category column with an associated completion date. 17,403 of the trees contained a value of “tree already removed” with an associated completion date. 1,866 of the trees contained a value of “tree delisted – no facility” with an associated completion date. In the 2025 WMP, Table 7-3-2, footnote (d) states “for purposes of Target VM-04, the term “Mitigate” is intended to refer to a tree identified from the legacy EVM program that is either: (1) removed by the TRI program; (2) removed by another PG&E VM program and no longer present; or (3) no longer poses a threat to PG&E facilities because the facilities has been relocated. If a tree is removed under another program, PG&E should indicate which program the removal occurred under to provide transparency on whether the tree is being counted for completion across multiple initiatives (i.e.: VM-18).

In data request DR048, the utility was asked to provide documentation of completion for 138 tree removals and to provide the associated HFTD for each, if possible. The utility provided an Excel spreadsheet titled “PGE_DR-048_20260508_RESPONSE_Q001_ATCH001” which showed 138 trees with identifiers as to the location associated with each record, unique identifiers for the vegetation point, the date the inspections were performed, the date tree work was conducted, and the actual work performed on the vegetation point. The IE reviewed the sampling data and identified no issues or discrepancies.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 33: Tree Removal Inventory - Transmission

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR048 Response	Initiative Validation Rate
25,000 Trees Mitigated	31,311 Trees Mitigated	31,702 Trees Mitigated	31,702 Trees Mitigated	127%

VM-05 – 8.2.2.3.1 Defensible Space Inspections – Distribution Substation – Focus and Non-Field Verifiable

Defensible space inspections at distribution substations mitigate wildfire risks by ensuring vegetation management practices effectively reduce ignition potential around critical infrastructure. The 2023-2025 WMP set a target to complete defensible space inspections at 131 distribution substations, with a risk impact goal of 53% (Eyes-on-Risk). PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 53.50% Eyes-on-Risk achieved.

According to the 2025 Q4 QDR and 2025 EC AIR, PG&E claimed defensible space inspections were completed at 130 distribution substations in 2025. PG&E states that the target of 131 was not achieved due to the decommissioning of the North Branch substation, thus stating that this initiative is 100% complete.

In support of VM-05, PG&E provided an Excel spreadsheet titled “PGE_VM-05_20260316_AUDIT_Q001_ATCH041” which contains 130 inspection records that include Inspection Notification Tag Number, SAP Functional Location, Facility Name, HFTD Tier, HFRA, Inspection Date, and SAP Entry Date.

The IE reviewed a sample of 67 inspection reports which consisted of 2 from non-HFTD, 37 from Tier 2-HFTD and 28 from Tier 3-HFTD. The utility responded with PDF “NRM Defensible Space program, Pre-Inspection Report” documents for all 67 samples requested. These reports contained facility information, inspection information (to include any inspection comments noted per inspection), and several photos taken for each facility/inspection. The IE reviewed the sampling data and found no issues or discrepancies.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 34: Defensible Space Inspections – Distribution Substation

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR049 Response	Initiative Validation Rate
131 Distribution Substations	130 Distribution Substations	130 Distribution Substations	130 Distribution Substations	99%

VM-06 – 8.2.2.3.1 Defensible Space Inspections – Transmission Substation – Non-Focus and Non-Field Verifiable

Defensible space inspections at transmission substations mitigate wildfire risks by ensuring vegetation management practices effectively reduce ignition potential around critical infrastructure. The 2023-2025 WMP set a target to complete defensible space inspections at 55 transmission substations, with a risk impact goal of 22% (Eyes-on-Risk). According to the 2025 Q4 QDR, PG&E claimed defensible space inspections were completed at 55 transmission substations in 2025. PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 22.63% Eyes-on-Risk achieved.

In support of VM-06, PG&E provided an Excel spreadsheet titled “PGE_VM-06_20260316_AUDIT_Q001_ATCH042” which contains 55 inspection records that include Inspection Notification Tag Number, SAP Functional Location, Facility Name, HFTD Tier, HFRA, Inspection Date, and SAP Entry Date.

The IE reviewed a sample of 21 inspection reports which consisted of 1 from non-HFTD, 5 from Tier 2-HFTD and 15 from Tier 3-HFTD. The utility responded with PDF “NRM DS Inspection Report” documents for all 21 samples requested. These reports contained facility information, inspection information (to include any inspection comments noted per inspection), and several photos taken for each facility/inspection. The IE reviewed the sampling data and identified no issues or discrepancies.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 35: Defensible Space Inspections – Transmission Substation

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR050 Response	Initiative Validation Rate
55 Transmission Substations	N/A	55 Transmission Substations	55 Transmission Substations	100%

VM-07 – 8.2.2.3.1 Defensible Space Inspections – Hydroelectric Substations and Powerhouses – Non-Focus and Non-Field Verifiable

Defensible space inspections at hydroelectric substations and powerhouses mitigate wildfire risks by ensuring vegetation management practices effectively reduce ignition potential around critical power generation facilities. The 2023-2025 WMP set a target to complete defensible space inspections at 61 hydroelectric substations and powerhouses, with a risk impact goal of 25% (Eyes-on-Risk). PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 23.87% Eyes-on-Risk achieved. PG&E states that the expected risk reduction was not achieved due to two powerhouses being removed from scope and two additional powerhouses being shutdown and disconnected from the grid.

According to the 2025 Q4 QDR and the 2025 AIR, PG&E claimed defensible space inspections were completed at 58 hydroelectric substations and powerhouses in 2025. PG&E states that the target of 61 was not achieved due to the transfer of ownership of two powerhouses, the indefinite shutdown of two additional powerhouses, and the addition of one generating facility due to HFRA boundary change. PG&E further noted that out of an abundance of caution, they completed defensible space inspections at the two decommissioned locations because distribution service still exists but given that there are no longer any active high or medium voltage assets at those locations, they are not counting those inspections toward their target. As a result, they stated that this initiative is 100% complete.

In support of VM-07, PG&E provided an Excel spreadsheet titled “PGE_VM-07_20260316_AUDIT_Q001_ATCH043” which contains 58 inspection records that include H3 Notification, Functional Location, Title, HFTD, HFRA, Pre-Inspection Date, and Notes.

The IE reviewed a sample of 22 inspection reports which consisted of 1 from non-HFTD, 5 from Tier 2-HFTD and 16 from Tier 3-HFTD. The utility responded with PDF “NRM DS Inspection Report” documents for all 22 samples requested. These reports contained facility information, inspection information (to include any inspection comments noted per inspection), and several photos taken for each facility/inspection. The IE reviewed the sampling data and identified no issues or discrepancies.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 36: Defensible Space Inspections – Hydroelectric Substations and Powerhouses

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR051 Response	Initiative Validation Rate
61 Hydroelectric Substations and Powerhouses	58 Hydroelectric Substations and Powerhouses	58 Hydroelectric Substations and Powerhouses	58 Hydroelectric Substations and Powerhouses	95%

VM-08 – 8.2.5 Vegetation Management – Quality Assurance – Focus and Non-Field Verifiable

Vegetation Management Quality Assurance (QA) audits confirm the accuracy and effectiveness of vegetation management work, ensuring compliance with PG&E’s vegetation management standards. The 2023-2025 WMP set specific targets for quality verification audits across three vegetation management programs.

Distribution Routine VM – HFTD

PG&E established a 2025 target of completing quality assurance audits at 2,862 locations for distribution routine VM with a pass rate of 95%. No specific risk reduction goal was identified. According to PG&E’s 2025 Q4 QDR and 2025 AIR, the utility completed quality assurance audits at 4,101 locations, exceeding its annual target, with a pass rate of 99.92%.

Transmission Routine VM – HFTD

PG&E established a 2025 target of completing quality assurance audits at 1,374 locations for transmission routine VM with a pass rate of 95%. No specific risk reduction goal was identified. According to PG&E's 2025 Q4 QDR and 2025 AIR, the utility completed quality assurance audits at 2,042 locations, exceeding its annual target, with a pass rate of 99.99%.

Vegetation Control Pole Clearing – HFTD

PG&E established a 2025 target of completing quality assurance audits at 2,061 locations for vegetation control pole clearing with a pass rate of 95%. No specific risk reduction goal was identified. According to PG&E's 2025 Q4 QDR and 2025 AIR, the utility completed quality assurance audits at 2,647 locations, exceeding its annual target, with a pass rate of 100%.

In support of VM-08, PG&E provided Excel spreadsheets titled "PGE_VM-08_20260316_AUDIT_Q001_ATCH044" showing 4,101 distribution audits, "PGE_VM-08_20260316_AUDIT_Q001_ATCH045" showing 2,042 transmission audits, and "PGE_VM-08_20260316_AUDIT_Q001_ATCH046" showing pole clearing 2,647 audits.

The IE reviewed a sample of 138 vegetation management quality verification audits which consisted of 4 from non-HFTD, 18 from Tier 2-HFTD, 70 from Tier 3-HFTD, and 46 from HFTD not listed. PG&E provided Excel spreadsheets titled "PGE_DR-052_20260508_RESPONSE_Q001_ATCH001" showing 47 distribution audits, "PGE_DR-052_20260508_RESPONSE_Q001_ATCH002" showing 46 transmission audits, and "PGE_DR-052_20260508_RESPONSE_Q001_ATCH003" showing 45 pole clearing audits. All three spreadsheets accounted for the 138 samples requested. Each list provided the survey ID, location, audit date, trees inspected, and associated tree fail/pass findings. The IE reviewed the sampling data and identified no findings in the selected samples, no issues or discrepancies were identified.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 37: Vegetation Management – Quality Assurance

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR052 Response	Initiative Validation Rate
Distribution Routine VM – HFTD: 2,862 audit locations; 95% pass rate.	Distribution Routine VM – HFTD: 4,101 audit locations; 99.92% pass rate.	Distribution Routine VM – HFTD: 4,101 audit locations; 99.92% pass rate.	Distribution Routine VM – HFTD: 4,101 audit locations; 99.92% pass rate.	143%
Transmission VM – HFTD: 1,374 audit locations; 95% pass rate.	Transmission VM – HFTD: 2,042 audit locations; 99.99% pass rate.	Transmission VM – HFTD: 2,042 audit locations; 99.99% pass rate.	Transmission VM – HFTD: 2,042 audit locations; 99.99% pass rate.	149%
Vegetation Control Pole Clearing – HFTD: 2,061 audit locations; 95% pass rate.	Vegetation Control Pole Clearing – HFTD: 2,647 audit locations; 100% pass rate.	Vegetation Control Pole Clearing – HFTD: 2,647 audit locations; 100% pass rate.	Vegetation Control Pole Clearing – HFTD: 2,647 audit locations; 100% pass rate.	128%

VM-09 – 8.2.1.1 Constraint Resolution Procedural Guideline – Non-Focus and Non-Field Verifiable

VM-09 outlines PG&E’s objective to develop a process of centralizing constraints resolution. As part of the build out of the centralized constraints team, three major categories will be addressed: customer constraints, environmental constraints (including internal PG&E procedures required to perform work) and permitting constraints (including both Land and Environmental permits).

PG&E’s 2023-2025 WMP set a 2025 target to establish a process of centralizing constraints resolution as it relates to environmental delays, customer interference, permitting delays/restrictions or operational holds, weather conditions, active wildfire, and accessibility into the area where distribution system inspections are required. According to the 2025 EC AIR, the objective is complete, as the following was accomplished for this three-year objective:

- Created or updated procedural guidelines in support of three main constraint categories (Customer, Environmental, and Permitting);
- Evaluated and implemented a Right Tree, Right Place Program; and
- Created metrics to track constraints by type and produced reporting to support.

In support of VM-09, PG&E provided frontload documentation in the form of a 20-page document titled “VM-09: Constraint Resolution Procedural Guidelines Completion Report.” According to the documentation, PG&E conducted an evaluation after one year of implementation to determine

whether existing reporting processes were driving the intended operational behaviors and to incorporate feedback received from internal departments. PG&E states that the results of this evaluation led to updates in performance metrics and Command Center Reporting processes to better align with the objectives of the VM-09 commitment and improve the tracking and resolution of vegetation-related constraints. The documentation further states that PG&E published an updated Vegetation Management Distribution Interference Procedure (TD-7102P-04) on March 26, 2025, and established a “Right Tree, Right Place” Program intended to educate customers regarding appropriate vegetation selection and placement near PG&E assets.

Based on this analysis and the documentation reviewed, the IE has validated this initiative.

Table 38: Constraint Resolution Procedural Guideline

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data (DR003) Response	Initiative Validation Rate
Process of Centralizing Constraints Resolution	Complete	Complete	Constraint Resolution Procedural Guidelines Completion Report	100%

VM-13 – 8.2.2.1.1 Routine Ground - Transmission – Non-Focus and Non-Field Verifiable

Routine ground inspections of transmission lines ensure proactive identification and mitigation of vegetation-related risks. The 2023-2025 WMP set a target of 17,740 circuit miles of routine ground inspections of transmission lines with a risk impact goal of 100% (Eyes-on-Risk). According to the 2025 Q4 QDR and 2025 AIR, PG&E claimed 17,953 circuit miles of inspections were completed. PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 100% Eyes-on-Risk achieved.

In support of VM-13, PG&E provided an Excel spreadsheet titled “PGE_VM-13_20260316_AUDIT_Q001_ATCH047” which shows a total of 1,393 points equaling 17,911 attestation miles. As part of this spreadsheet, a column entitled “Final Execution Mileage” is provided which shows a total of 17,953 miles which matches PG&E’s claimed amount for 2025.

In data request DR054, the utility was asked to provide a sample of PDF reports from approximately 35 circuit miles of routine ground inspections which consisted of approximately 3 from non-HFTD, 7 from Tier 2-HFTD and 25 from Tier 3-HFTD. The utility provided an Excel spreadsheet entitled “PGE_DR-054_20260417_RESPONSE_Q001_ATCH001” which showed 964 points of tree record data. PG&E states that this data was pulled to identify any records created from the listed inspections for the IE. This data reflects inspection activity to include inspection dates, prescribed work, and work completion details. The IE was able to determine that the data points provided were from 8 circuits equaling 157.32 circuit miles (the Peoria Tap circuit yielded

no detections) across HFTD Non, 2, & 3. Out of the 964 points listed, 163 items had associated Work Request, Date Issued, Tree Work Date, and Work Request Complete Date information.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 39: Routine Ground - Transmission

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR054 Response	Initiative Validation Rate
17,740 Circuit Miles	17,953 Circuit Miles	17,953 Circuit Miles	17,953 Circuit Miles	101%

VM-14 – 8.2.2.1.2 Second Patrol - Transmission – Non-Focus and Non-Field Verifiable

Transmission second patrol inspections provide an additional layer of vegetation monitoring, enabling timely identification and mitigation of risks within HFTD/HFRA. The 2023-2025 WMP set a target of 5,625 circuit miles of second patrol inspections of transmission lines with a risk impact goal of 100% (Eyes-on-Risk). According to the 2025 Q4 QDR and 2025 AIR, PG&E claimed 6,058 circuit miles of inspections were completed. PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 100% Eyes-on-Risk achieved.

In support of VM-14, PG&E provided an Excel spreadsheet titled “PGE_VM-14_20260316_AUDIT_Q001_ATCH048” which shows a total of 547 circuits equaling 6,058 total inspected circuit miles which matches PG&E’s claimed amount for 2025.

In data request DR055, the utility was asked to provide a sample of PDF reports from approximately 35 circuit miles of routine ground inspections which consisted of approximately 3 from non-HFTD, 7 from Tier 2-HFTD and 25 from Tier 3-HFTD. The utility provided an Excel spreadsheet entitled “PGE_DR-055_20260417_RESPONSE_Q001_ATCH001” which showed 724 points of tree record data. PG&E states that this data was pulled to identify any records created from the listed inspections for the IE. This data reflects inspection activity to include inspection dates, prescribed work, and work completion details. The IE was able to determine that the data points provided were from 5 circuits equaling 34.95 circuit miles. The following circuits yielded no detections: Drum-Spaulding, Washoe Tap, Tocaloma Tap, Tesla-Ravenswood, and Desable-Centerville. Out of the 724 points listed, 43 items had associated Work Request, Date Issued, Tree Work Date, and Work Request Complete Date information.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 40: Second Patrol - Transmission

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR054 Response	Initiative Validation Rate
5,625 Circuit Miles	6,058 Circuit Miles	6,058 Circuit Miles	6,058 Circuit Miles	108%

VM-15 – 8.2.2.1.3 Integrated Vegetation Management - Transmission – Non-Focus and Non-Field Verifiable

Integrated Vegetation Management (IVM) for transmission rights-of-way (ROW) is intended to mitigate wildfire risk through the systematic management and control of vegetation growth near transmission infrastructure. PG&E states that IVM practices promote the establishment and maintenance of desirable, stable, low-growing plant communities that are more resistant to the encroachment of taller-growing tree and brush species that could threaten transmission facilities.

The 2023-2025 WMP set a target of completing integrated vegetation management and fee inspections of 6,504 acres ROW across the transmission systemwide. PG&E states “TBD” for a risk reduction goal. According to the 2025 EC AIR, PG&E claimed 6,659.31 acres of integrated vegetation management inspections were completed.

In support of VM-15, PG&E provided frontload documentation in the form of an Excel spreadsheet titled “PGE_VM-15_20260316_AUDIT_Q001_ATCH049” which contained work plan and execution data confirming that 6,659.31 acres of ROW inspections were completed in 2025. This spreadsheet documented an execution summary, inspection attestations, PMD records, IVM polygons, and standards and procedure guidelines.

In data request DR056, the utility was asked to provide documentation of completion for 34 acres of IVM inspections which consisted of 4 acres from non-HFTD, 6 acres from Tier 2-HFTD and 24 acres from Tier 3-HFTD. The utility provided eight (8) inspector attestation statements, signed by the inspector completing the inspection and included the company represented, the title of the individual, and the date signed. Each statement provided the total footprint acreage and total ROW miles inspected and by signing the document, the inspector attested that the inspections were completed following the Transmission Integrated Vegetation Management Right-of-Way Maintenance Procedure. The IE was able to cross reference the information provided on these attestation statements to the frontload data provided and no discrepancies were noted.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 41: Integrated Vegetation Management - Transmission

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR056 Response	Initiative Validation Rate
6,504 Acres ROW	6,659.31 Acres ROW	6,659 Acres ROW	6,659.31 Acres ROW Attestation Statements	102%

VM-16 – 8.2.2.2.1 Routine Patrol - Distribution – Focus and Non-Field Verifiable

Distribution routine patrol inspections support wildfire risk mitigation through the proactive identification of vegetation conditions located along distribution lines and associated electrical infrastructure. This program performs scheduled inspections of all overhead primary and secondary distribution facilities to maintain required radial clearances between vegetation and energized conductors. Inspections are intended to identify trees and vegetation that may encroach within the Minimum Distance Requirement (MDR) in accordance with applicable regulatory requirements and PG&E procedures. In addition, the program identifies dead, dying, or declining trees that present a risk of failure and potential contact with conductors, allowing mitigation activities to be implemented to reduce the likelihood of vegetation-related outages, equipment damage, and potential wildfire ignition events.

The 2023-2025 WMP set a target of 78,200 circuit miles of routine patrol inspections of distribution lines with a risk reduction goal of <1%. According to the 2025 EC AIR 78,438 span miles of inspections were completed in 2025. Related to this initiative, PG&E provided the following statement in the 2025 AIR: *“Based on feedback from Energy Safety, we updated the previously listed unit of measure from ‘Circuit Miles’ to ‘Span Miles’ in WMDR. Please note that Span miles have always been the unit of measure in our current system of record, One VM.”* PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 0.60% achieved.

In support of VM-16, PG&E provided frontload documentation in the form of an Excel spreadsheet titled “PGE_VM-16_20260316_AUDIT_Q001_ATCH050_BCONF” which contained a total of 1,907,244 points with associated details such as Project Division, Project Number, Project Name, Project year, SPAN_SF_ID, SMAN ID, Miles, latitude/longitude, and inspection date. This data confirms the 78,438 span miles claimed by PG&E.

In data request DR057, the utility was asked to provide a sample of PDF reports from 138 circuit miles of routine patrol distribution inspections which consisted of 14 from non-HFTD, 27 from Tier 2-HFTD and 97 from Tier 3-HFTD. The utility provided an Excel spreadsheet titled “PGE_DR-057_20260501_RESPONSE_Q001_ATCH001” which showed 201 records with associated details such as AssetSFID, TOTAL_VEGWORK_COUNT”, project name, project program, HFTD, Associated Span ID, WOLI Status, and Actual Trim Type. The IE filtered out all records containing “NULL” cells across the record and the total number of records with inspection details totaled 98. PG&E stated that sample spans where the

TOTAL_VEGWORK_COUNT is zero, there will be NULL values in prescription and work-related fields as no tree work was prescribed as a result of the span inspection. In addition, PG&E provided a 4-page span inspection record showing the full inspection/work order information for a sample inspection. This report shows granular data regarding the span miles inspected, span location information, detailed inspection information and includes links to uploaded files.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 42: Routine Patrol - Distribution

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR057 Response	Initiative Validation Rate
78,200 Circuit Miles	78,438 Span Miles	78,476 Circuit Miles	78,438 Span Miles	100%

VM-17 – 8.2.2.2.2 Second Patrol - Distribution – Non-Focus and Non-Field Verifiable

Second patrol distribution inspections are performed approximately six months offset from the routine patrol on overhead primary and secondary distribution facilities. The primary target for secondary patrols is HFTD and HFRA but exceptions and additional areas are included to appropriately address vegetation associated risks. This program performs scheduled inspections of all overhead primary and secondary distribution facilities to maintain required radial clearances between vegetation and energized conductors. Inspections are intended to identify trees and vegetation that may encroach within the Minimum Distance Requirement (MDR) in accordance with applicable regulatory requirements and PG&E procedures. In addition, the program identifies dead, dying, or declining trees that present a risk of failure and potential contact with conductors, allowing mitigation activities to be implemented to reduce the likelihood of vegetation-related outages, equipment damage, and potential wildfire ignition events.

The 2023-2025 WMP set a target of 25,685 circuit miles of second patrol inspections of distribution lines with a risk reduction goal of <1%. According to the 2025 Q4 QDR, 25,714 circuit miles of inspections were completed. PG&E states in its 2025 AIR that 25,704 span miles of inspections were completed. Related to this initiative, PG&E provided the following statement in the 2025 AIR: *“Based on feedback from Energy Safety, we updated the previously listed unit of measure from ‘Circuit Miles’ to ‘Span Miles’ in WMDR. Please note that Span miles have always been the unit of measure in our current system of record, One VM.”* PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 0.55% achieved.

In support of VM-17, PG&E provided frontload documentation in the form of an Excel spreadsheet entitled “PGE_VM-17_20260316_AUDIT_Q001_ATCH051_BCONF” which contained a total of 575,167 points with associated details such as Project Division, Project Number, Project Name, Project Year, SPAN_SF_ID, SMAN ID, Miles, latitude/longitude, and inspection date. This data confirms the 25,704 span miles claimed by PG&E.

In data request DR058, the utility was asked to provide a sample of PDF reports from 35 circuit miles of second patrol distribution inspections which consisted of 3 from non-HFTD, 7 from Tier 2-HFTD and 25 from Tier 3-HFTD. The utility provided an Excel spreadsheet entitled “PGE_DR-058_20260501_RESPONSE_Q001_ATCH001” which showed 60 records with associated details such as AssetSFID, TOTAL_VEGWORK_COUNT”, project name, project program, HFTD, Associated Span ID, WOLI Status, and Actual Trim Type. The IE filtered out all records containing “NULL” cells across the record and the total number of records with inspection details totaled 28. PG&E stated that sample spans where the TOTAL_VEGWORK_COUNT is zero, there will be NULL values in prescription and work-related fields as no tree work was prescribed as a result of the span inspection. In addition, PG&E provided a 5-page span inspection record showing the full inspection/work order information for a sample inspection. This report shows granular data regarding the span miles inspected, span location information, detailed inspection information and includes links to uploaded files.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 43: Second Patrol - Distribution

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Response/ DR058	Initiative Validation Rate
25,685 Circuit Miles	25,704 Span Miles	25,714 Circuit Miles	25,704 Span Miles	100%

VM-18 – 8.2.2.2.3 VM for Operational Mitigations (VMOM) – Non-Focus and Non-Field Verifiable

VM-18 outlines PG&E’s vegetation management program focused on operational mitigations intended to reduce outages and potential wildfire ignitions through implementation of a risk-informed and targeted vegetation management strategy. The program utilizes historical vegetation outage data associated with Enhanced Powerline Safety Settings (EPSS)-enabled circuits to identify and mitigate areas with elevated vegetation contact risk. The overall scope of work is developed using a combination of EPSS operational data, historical outage information, and vegetation failure analysis derived from the Wildfire Distribution Risk Model (WDRM) v3 risk model.

The 2023-2025 WMP set a target of 6,500 trees mitigated as part of the VM Operational Mitigations program on EPSS capable circuits. PG&E states “TBD” for a risk reduction goal. According to the 2025 EC AIR 8,165 trees were mitigated in 2025. PG&E’s Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 0.05% achieved.

In support of VM-18, PG&E provided frontload documentation in the form of an Excel spreadsheet titled “PGE_VM-18_20260316_AUDIT_Q001_ATCH052_BCONF” which contained One VM compilation data demonstrating PG&E’s claimed tree mitigation of 8,165. This data included a summary, One VM constraint data, and outage information.

In data request DR058, the utility was asked to provide documentation of completion for 34 trees mitigated which consisted of 4 from non-HFTD, 6 from Tier 2-HFTD and 24 from Tier 3-HFTD. The utility provided an Excel spreadsheet titled “PGE_DR-058_20260424_Q001_ATCH001” which showed 35 with associated details such as VegPointID, Project Region, Project Service Territory, Project Year, Project Program, RescripID, Species, latitude/longitude, project address, HFTD, and associated work order number. The IE reviewed the sampling data and identified no issues or discrepancies.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 44: VM for Operational Mitigations (VMOM)

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR058 Response	Initiative Validation Rate
6,500 Trees Mitigated	8,165 Trees Mitigated	8,326 Trees Mitigated	8,165 Trees Mitigated	126%

VM-22 – 8.2.5.2 Vegetation Management – Quality Control – Focus and Non-Field Verifiable

Vegetation Management Quality Control (QC) audits verify that vegetation management activities are performed consistently and comply with PG&E’s vegetation management standards. The 2023-2025 WMP set specific targets for quality verification audits across three vegetation management programs.

Distribution Routine VM – HFTD

PG&E established a 2025 target of completing quality control audits at 85,000 locations for distribution routine VM with a pass rate of 95%. No specific risk reduction goal was identified. According to PG&E’s 2025 Q4 QDR and 2025 AIR, the utility completed quality verification audits at 90,164 locations, exceeding its annual target, with a pass rate of 99.24%.

Transmission Routine VM – HFTD

PG&E established a 2025 target of completing quality control audits at 14,500 locations for transmission routine VM with a pass rate of 95%. No specific risk reduction goal was identified. According to PG&E’s 2025 Q4 QDR and 2025 AIR, the utility completed quality verification audits at 15,675 locations, exceeding its annual target, with a pass rate of 99.76%.

Vegetation Control Pole Clearing – HFTD

PG&E established a 2025 target of completing quality control audits at 12,500 locations for vegetation control pole clearing with a pass rate of 95%. No specific risk reduction goal was identified. According to PG&E’s 2025 Q4 QDR and 2025 AIR, the utility completed quality verification audits at 13,312 locations, exceeding its annual target, with a pass rate of 99.45%.

In support of VM-08, PG&E provided Excel spreadsheets titled “PGE_VM-22_20260316_AUDIT_Q001_ATCH053” showing 90,164 distribution audits, “PGE_VM-

22_20260316_AUDIT_Q001_ATCH054” showing 15,675 transmission audits, and “PGE_VM-22_20260316_AUDIT_Q001_ATCH055” showing 13,312 pole clearing audits.

The IE reviewed a sample of 137 vegetation management quality control audits which consisted of 9 from non-HFTD, 27 from Tier 2-HFTD, and 101 from Tier 3-HFTD. PG&E provided Excel spreadsheets titled “PGE_DR-060_20260508_RESPONSE_Q001_ATCH001” showing 45 distribution audits, “PGE_DR-060_20260508_RESPONSE_Q001_ATCH002” showing 47 transmission audits, and “PGE_DR-060_20260508_RESPONSE_Q001_ATCH003” showing 45 pole clearing audits. All three spreadsheets accounted for the 137 samples requested. Each list provided the survey ID, location, audit date, trees inspected, and associated tree fail/pass findings. The IE reviewed the sampling data and identified no findings in the selected samples, no issues or discrepancies were identified.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 45: Vegetation Management – Quality Control

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR060 Response	Initiative Validation Rate
Distribution Routine VM – HFTD: 85,000 audit locations; 95% pass rate.	Distribution Routine VM – HFTD: 90,164 audit locations; 99.24% pass rate.	Distribution Routine VM – HFTD: 90,164 audit locations; 99.24% pass rate.	Distribution Routine VM – HFTD: 90,164 audit locations; 99.24% pass rate.	105%
Transmission VM – HFTD: 14,500 audit locations; 95% pass rate.	Transmission VM – HFTD: 15,675 audit locations; 99.76% pass rate.	Transmission VM – HFTD: 15,675 audit locations; 99.76% pass rate.	Transmission VM – HFTD: 15,675 audit locations; 99.76% pass rate.	108%
Vegetation Control Pole Clearing – HFTD: 12,500 audit locations; 95% pass rate.	Vegetation Control Pole Clearing – HFTD: 13,312 audit locations; 99.45% pass rate.	Vegetation Control Pole Clearing – HFTD: 13,312 audit locations; 99.45% pass rate.	Vegetation Control Pole Clearing – HFTD: 13,312 audit locations; 99.45% pass rate.	106%

4.2.2.2 Funding Verification – Findings

VM-01 – LiDAR Data Collection - Transmission

Strategic Overview and Risk Mitigation

This initiative involved LiDAR data collection for the transmission system to support accurate vegetation management by identifying vegetation encroachments and facilitating timely mitigation. PG&E set a target to collect LiDAR data for 17,500 circuit miles of the transmission system and no specific risk reduction goal was identified.

Financial Performance Analysis

- Planned Budget: \$6,409,000
- Actual Expenditure: \$11,044,000
- Variance: \$4,635,000 (72% Overrun)
- PG&E Justification: PG&E clarified that LiDAR costs are primarily captured under initiative VM-01, with a portion also allocated to VM-14, and confirmed that no LiDAR costs are recorded under any other initiatives. PG&E explained that increased data processing and analytical support costs were mainly driven by higher-than-forecasted annual contract pricing increases. In response to the 2025 cost experience, PG&E also stated that the 2026–2028 WMP forecasting methodology was revised to transition data processing and analytics activities to internal resources, and the existing external support contract will not be renewed.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by collecting LiDAR data for 17,954 circuit miles. Although PG&E did not establish risk reduction goal for this initiative, their implementation of this initiative supports progress toward wildfire mitigation objectives.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The overrun was primarily driven by higher-than-forecasted annual contract pricing increases associated with LiDAR data processing and analytical support activities. PG&E also clarified that LiDAR costs were allocated between initiatives VM-01 and VM-14, and in response to the 2025 cost experience, revised its 2026–2028 forecasting methodology to transition these activities to internal resources and discontinue the existing external support contract.

VM-02 – Pole Clearing Program

Strategic Overview and Risk Mitigation

This initiative involves performing removal/clearing of vegetation around select Transmission and Distribution poles and towers to create fire breaks to reduce risk, improve access to equipment, allow for safe Supervisory Control and data Acquisition operations, enhance public safety, supplement other mitigations, and protect assets from wildfires regardless of cause at equipment locations. PG&E set a target of clearing 77,376 poles (based on refreshed asset registry prior to work commencement), aiming to achieve a <1% risk reduction goal.

Financial Performance Analysis

- Planned Budget: \$27,363,000
- Actual Expenditure: \$32,851,000
- Variance: \$5,488,000 (20% Overrun)
- PG&E Justification: PG&E explained that VM-02 costs are tracked based on initial clear units and therefore cannot be easily separated into discrete cost categories. PG&E stated that increased units completed from 2024 to 2025 were primarily driven by additional SMU-20 scope units. The increase in 1254C tree work resulted from a greater focus on completing pole-clearing activities, with work locations increasing from approximately 5,000 to 16,000, contributing an estimated \$4.4 million cost increase. PG&E also reported that inspection volumes increased from approximately 706,000 poles to 871,000 poles due to the inclusion of SMU-20 locations and HFTD/HFRA map updates, contributing an estimated \$1.2 million increase in inspection costs.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by conducting pole clearing activities for 80,301 poles, collecting LiDAR data for 17,954 circuit miles, thus achieving the <1% risk reduction goal.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The overrun was primarily driven by increased work scope and inspection volumes. PG&E reported that additional SMU-20 scope units increased total completed units, while expanded focus on 1254C pole-clearing tree work increased locations from approximately 5,000 to 16,000, contributing an estimated \$4.4 million cost increase. In addition, inspection volumes increased from approximately 706,000 to 871,000 poles due to SMU-20 locations and HFTD/HFRA map updates, resulting in an estimated \$1.2 million increase in inspection costs.

VM-03 – Focused Tree Inspections (FTI)

Strategic Overview and Risk Mitigation

This initiative involved detailed inspections of high-risk areas that have experienced higher volumes of vegetation damage during PSPS events, outages, and/or ignitions. PG&E set a target of 1,500 circuit miles of FTI inspections, aiming to achieve a <1% risk reduction goal

Financial Performance Analysis

- Planned Budget: \$183,964,000
- Actual Expenditure: \$101,900,000
- Variance: -\$82,064,000 (45% Underrun)
- PG&E Justification: The 2025 EC AIR states that realized efficiencies led to lower unit costs than planned. PG&E was asked what specific factors led to the increased efficiency and lower unit cost and to provide a breakdown of how the overrun for Distribution Routine and Second Patrol programs were balanced using the underrun for this initiative. PG&E stated that unit cost was decreased due to the December End Target (DET) not aligning directly to the operational workplan unit cost. PG&E further stated that Focused Tree

Inspections (FTI) funding was reduced at Plan Delivery Center (PDC) change control from \$183.964M to \$103.466M and the reduction was allocated to other programs.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by conducting 1,531 focused tree inspections, thus achieving the <1% risk reduction goal.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The underrun was driven by lower unit costs resulting from differences between the December End Target (DET) and the operational workplan unit cost. PG&E also stated that Focused Tree Inspection (FTI) funding was reduced through PDC change control, with a portion of the funding reallocated to support Distribution Routine and Second Patrol programs.

VM-04 – Tree Removal Inventory (TRI)

Strategic Overview and Risk Mitigation

This initiative involved tree removals identified from the legacy Enhanced Vegetation Management (EVM) program to reduce wildfire ignition risks by proactively addressing hazardous vegetation. PGE set a target to mitigate 25,000 trees identified from the legacy EVM program, aiming to achieve a <1% risk reduction goal.

Financial Performance Analysis

- Planned Budget: \$70,386,000
- Actual Expenditure: \$29,429,000
- Variance: -\$40,957,000 (58% Underrun)
- PG&E Justification: PG&E was asked to provide a breakdown of how the overrun for Distribution Routine and Second Patrol programs were balanced using the underrun for this initiative. PG&E stated that the Tree Removal Inventory (TRI) budget was reduced from \$68.407M to \$34.796M. The reduction was allocated to Distribution Routine, Distribution Second Patrol, VMOM, and Distribution VC.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by removing 31,311 trees, thus achieving the <1% risk reduction goal.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The underrun was driven by a reduction in the Tree Removal Inventory (TRI) budget from \$68.407 million to \$34.796 million. PG&E stated that the reduced funding was reallocated to support Distribution Routine, Distribution Second Patrol, VMOM, and Distribution VC programs.

VM-05 – Defensible Space Inspections – Distribution Substation**Strategic Overview and Risk Mitigation**

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 29.

VM-06 – Defensible Space Inspections – Transmission Substation**Strategic Overview and Risk Mitigation**

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 29.

VM-07 – Defensible Space Inspections – Hydroelectric Substations and Powerhouses**Strategic Overview and Risk Mitigation**

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 29.

VM-08 – Vegetation Management – Quality Assurance**Strategic Overview and Risk Mitigation**

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 29.

VM-09 – Constraint Resolution Procedural Guideline**Strategic Overview and Risk Mitigation**

This initiative involved developing a process of centralizing constraints resolution, to include customer constraints, environmental constraints (including internal PG&E procedures required to perform work) and permitting constraints (including both Land and Environmental permits). PG&E set a 2025 target to establish a process of centralizing constraints resolution as it relates to environmental delays, customer interference, permitting delays/restrictions or operational holds, weather conditions, active wildfire, and accessibility into the area where distribution system inspections are required. PG&E did not establish a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met its operational goal through the completion of the following objectives for this three-year objective:

- Created or updated procedural guidelines in support of three main constraint categories (Customer, Environmental, and Permitting);
- Evaluated and implemented a Right Tree, Right Place Program; and
- Created metrics to track constraints by type and produced reporting to support.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

VM-13 – Routing Ground - Transmission

Strategic Overview and Risk Mitigation

This initiative involved routine ground inspections of transmission lines ensure proactive identification and mitigation of vegetation-related risks. PG&E set a target of 17,740 circuit miles of routine ground inspections of transmission lines, aiming to achieve a risk impact goal of 100% (Eyes-on-Risk).

Financial Performance Analysis

- Planned Budget: \$24,797,000
- Actual Expenditure: \$27,553,000
- Variance: \$2,756,000 (11% Overrun)
- PG&E Justification: PG&E was asked to provide the rationale that led to the increased presence for VM oversight. PG&E stated that they implemented organizational and programmatic changes to driver operational improvements to meet the company's commitments related to wildfire mitigation, quality, and safety. This scope of work is an integral part of the VM oversight services.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by conducting 17,853 circuit miles of inspections, thus achieving the stated 100% risk reduction goal.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The overrun was attributed to an increased VM oversight presence driven by organizational and programmatic changes implemented to support operational improvements related to wildfire mitigation, quality, and safety commitments. PG&E stated that these expanded activities were an integral component of the VM oversight services scope of work.

VM-14 – Second Patrol - Transmission**Strategic Overview and Risk Mitigation**

This initiative involved transmission second patrol inspections provide an additional layer of vegetation monitoring, enabling timely identification and mitigation of risks within HFTD/HFRA. PG&E set a target of 5,625 circuit miles of second patrol inspections of transmission lines with a risk impact goal of 100% (Eyes-on-Risk).

Financial Performance Analysis

- Planned Budget: \$1,152,000
- Actual Expenditure: \$1,872,000
- Variance: \$720,000 (63% Overrun)
- PG&E Justification: PG&E was asked to provide the rationale for VM-01 stating that LiDAR used in Second Patrol was captured under that initiative and to confirm if, and detail what, LiDAR costs are being captured under this initiative (VM-14) and if those costs are captured under any other program or initiative. PG&E stated that of the \$3.90M of total LiDAR costs associated with VM-14, \$1.44M was captured under VM-14 and the remaining LiDAR costs were captured under VM-01. Additionally, PG&E stated that based on the 2025 cost experience, additional focus has been placed on ensuring costs are captured correctly to the appropriate initiatives.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by conducting 6,058 circuit miles of inspections, thus achieving the stated 100% risk reduction goal.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The overrun was partially attributable to LiDAR cost allocations associated with VM-14. PG&E stated that of the \$3.90 million in total LiDAR costs related to VM-14, \$1.44 million was recorded under VM-14, while the remaining costs were captured under VM-01. PG&E also noted that, based on the 2025 cost experience, additional emphasis has been placed on improving the accuracy of cost allocation across initiatives.

VM-15 – Integrated Vegetation Management - Transmission**Strategic Overview and Risk Mitigation**

This initiative involved Integrated Vegetation Management (IVM) for transmission rights-of-way (ROW) to mitigate wildfire risk through the systematic management and control of vegetation growth near transmission infrastructure. PG&E set a target of completing integrated vegetation management and fee inspections of 6,504 acres ROW across the transmission systemwide. PG&E states “TBD” for a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$15,524,000

- Actual Expenditure: \$13,682,000
- Variance: -\$1,842,000 (12% Underrun)
- PG&E Justification: PG&E was asked to provide information as to what specific factors led to the unit efficiencies that resulted in an underrun. PG&E stated the unit efficiencies and underrun were primarily driven by reduced vegetation volume on a portion of completed acreage. Prior right-of-way projects had previously cleared and expanded these areas, which reduced the amount of vegetation to be cleared.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by conducting 6,659.31 circuit miles of inspections. Although PG&E did not establish risk reduction goal for this initiative, their implementation of this initiative supports progress toward wildfire mitigation objectives.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The underrun was primarily driven by unit efficiencies resulting from reduced vegetation volume across portions of the completed acreage. PG&E stated that prior right-of-way projects had already cleared and expanded these areas, reducing the amount of vegetation requiring removal.

VM-16 – Routine Patrol - Distribution

Strategic Overview and Risk Mitigation

This initiative involved distribution routine patrol inspections to support wildfire risk mitigation through the proactive identification of vegetation conditions located along distribution lines and associated electrical infrastructure. PG&E set a target of 78,200 circuit miles of routine patrol inspections of distribution lines, aiming to achieve a <1% risk reduction goal.

Financial Performance Analysis

- Planned Budget: \$745,303,000
- Actual Expenditure: \$885,992,000
- Variance: \$140,689,000 (19% Overrun)
- PG&E Justification: PG&E was asked to provide an approximate split of the overrun between increased units completed, increased pre-inspections, and Blitz reliability work. PG&E stated that the 2025 Distribution Routine overrun was attributable to three primary categories: an overrun of 115,721 completed units for Distribution Routine activities, approximately \$75.8 million in variance associated with increased pre-inspection activities, and Reliability Blitz work contributing 50,901 units of variance and approximately \$45.8 million in additional costs.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by conducting 78,438 span miles of inspections, thus achieving the stated <1% risk reduction goal.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The overrun was driven by increased Distribution Routine work volumes, expanded pre-inspection activities, and Reliability Blitz work. PG&E reported an overrun of 115,721 completed units for Distribution Routine activities, approximately \$75.8 million in additional variance related to pre-inspections, and Reliability Blitz activities contributing 50,901 units of variance and approximately \$45.8 million in additional costs.

VM-17 – Second Patrol - Distribution

Strategic Overview and Risk Mitigation

This initiative involved second patrol distribution inspections in HFTD and HFRA to appropriately address vegetation associated risks. PG&E set a target of 25,685 circuit miles of second patrol inspections of distribution lines, aiming to achieve a <1% risk reduction goal.

Financial Performance Analysis

- Planned Budget: \$124,040,000
- Actual Expenditure: \$143,387,000
- Variance: \$19,347,000 (16% Overrun)
- PG&E Justification: PG&E was asked to provide a breakdown of how the overrun for Distribution Routine programs was balanced using the underrun for other VM programs. PG&E stated that the Distribution Routine budget was increased from \$745.303M to \$849,843M and this was offset by the reduction in FTI, Distribution Wood Management, VM Tech, Veg Management Quality, and TRI.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by conducting 25,714 circuit miles of inspections, thus achieving the stated <1% risk reduction goal.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The overrun was driven by an increase in the Distribution Routine budget from \$745.303 million to \$849.843 million. PG&E stated that the increased spending was offset through reductions in FTI, Distribution Wood Management, VM Tech, Vegetation Management Quality, and TRI initiatives.

VM-18 – VM for Operational Mitigations (VMOM)

Strategic Overview and Risk Mitigation

This initiative involved utilizing historical vegetation outage data associated with Enhanced Powerline Safety Settings (EPSS)-enabled circuits to identify and mitigate areas with elevated vegetation contact risk. PG&E set a target of 6,500 trees mitigated as part of the VM Operational Mitigations program on EPSS capable circuits. PG&E states “TBD” for a risk reduction goal.

Financial Performance Analysis

- Planned Budget: \$9,681,040,000

- Actual Expenditure: \$11,328,000
- Variance: \$1,647,000 (17% Overrun)
- PG&E Justification: PG&E was asked to provide an explanation of what specific factors led to the increased unit costs for this initiative. PG&E stated that the increase in unit costs was attributed to an overestimation of planned operational efficiencies during initial forecasting, along with higher-than-expected tree work costs in the Sierra and Central Valley regions. PG&E also noted that these increased costs were likely driven by larger or more complex trees, challenging terrain, additional tree crews, and permitting requirements.

Operational Impact and Risk Reduction

According to the 2025 EC AIR 8,165 trees were mitigated in 2025. Although PG&E did not establish risk reduction goal for this initiative, their implementation of this initiative supports progress toward wildfire mitigation objectives.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The overrun was driven by higher-than-expected unit costs resulting from an overestimation of planned operational efficiencies during forecasting, as well as increased tree work costs in the Sierra and Central Valley regions due to larger and more complex trees, difficult terrain, additional crew requirements, and permitting needs.

VM-19 – One VM Application Record Keeping Enhancement

Strategic Overview and Risk Mitigation

This initiative involved enhancing the One VM application for Routine and Second Patrol to include the capability to capture factors for prescribing trees for removal. PG&E did not set a risk reduction goal for this initiative.

Financial Performance Analysis

Although this initiative is not identified with targets in PG&E's Q4 QDR Table 1, it was shown to be included in the financial tables from Q4 QDR Table 11. Since the initiative was identified in Q4 QDR Table 11 and the absolute percent difference between budgeted and actual for this item is greater than 10%, the WMP Planned Spend (\$) and EC-Claimed Actual Spend (\$) and % from budget) are as follows:

- Planned Budget: \$27,000,000
- Actual Expenditure: \$16,075,000
- Variance: -\$10,925,000 (40% Underrun)
- PG&E Justification: PG&E was asked to provide information on how the budget was determined for this initiative without having a 2025 WMP target. In addition, PG&E was asked to provide a breakdown of planned and actual CapEx and OpEx. PG&E stated that VM-19 was completed in 2024 and as a result, no technology development was scheduled for 2025, eliminating the need for a budget allocation.

Operational Impact and Risk Reduction

Without a specified 2025 target, quantifying immediate risk reduction impact is challenging. Nonetheless, completing this One VM enhancement supports progress toward wildfire mitigation objectives.

Assessment and Conclusion

Although direct 2025 risk reduction was not quantified, the initiative supports broader long-term wildfire mitigation objectives. The underrun was attributable to all work related to this initiative being completed in 2024.

VM-22 – Vegetation Management – Quality Control

Strategic Overview and Risk Mitigation

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 29.

4.2.3 Synthesis of Findings

4.2.3.1 Initiative Review

All 17 vegetation management initiatives met or exceeded their 2025 WMP targets, representing 100% target achievement across the category. Notable overperformances include VM-08 Quality Assurance audits exceeding targets by 43% for distribution (4,101 vs. 2,862), 49% for transmission (2,042 vs. 1,374), and 28% for pole clearing (2,647 vs. 2,061), alongside VM-22 Quality Control audits exceeding targets by 6% for distribution (90,164 vs. 85,000), 8% for transmission (15,675 vs. 14,500), and 6% for pole clearing (13,312 vs. 12,500). Two initiatives reported minor target shortfalls that PG&E characterized as 100% complete due to asset decommissioning: VM-05 completed 130 of 131 distribution substation inspections due to North Branch substation decommissioning, and VM-07 completed 58 of 61 hydroelectric facility inspections due to two powerhouse ownership transfers and two indefinite shutdowns, offset by one facility addition from HFRA boundary changes. PG&E's conservative approach of excluding decommissioned assets from completion counts demonstrates appropriate target recalibration.

VM-02 pole clearing demonstrated completion status ambiguity by counting "constrained" (5,961 poles) and "no work" (14,772 poles) toward the 80,301 total, with "no work" poles often containing comments stating "rated low risk on vc fire matric in RR no clearing required," while risk-based prioritization is appropriate, counting poles requiring no work toward completion targets inflates activity metrics without corresponding risk reduction.

4.2.3.2 Funding Verification

Budget and Expenditure Summary: The Vegetation Management and Inspections category had a total planned budget of \$1,277,465,000 with actual expenditures of \$1,313,978,000, representing a 2.86% variance above budget. The category's overall expenditure remained within 10% of the planned budget.

Initiatives with Significant Variances: Of the 17 total initiatives in this category, 12 (70.59%) had absolute percent differences exceeding 10%. Several initiatives demonstrated significant financial variances:

- VM-16 Routine Patrol – Distribution represented the most significant overrun within the reviewed vegetation management portfolio. The initiative exceeded budget by approximately \$140.7 million while also exceeding operational inspection targets. PG&E attributed the overrun primarily to increased Distribution Routine work volumes, expanded pre-inspection activities contributing approximately \$75.8 million in additional variance, and Reliability Blitz work contributing approximately \$45.8 million in additional costs. The initiative reflects PG&E’s prioritization of increased field execution and vegetation risk mitigation activities despite materially higher operational costs.
- VM-03 Focused Tree Inspections (FTI) represented one of the largest underruns. PG&E explained that lower unit costs and revised operational workplan assumptions contributed to reduced expenditures, while a significant portion of the budget was formally reallocated through PDC change control to support other vegetation management initiatives. Importantly, despite the substantial financial underrun, PG&E exceeded the operational inspection target, indicating that wildfire mitigation objectives continued to be achieved.
- VM-04 Tree Removal Inventory (TRI) similarly demonstrated a major underrun associated with formal budget reductions and redistribution of funding to higher-priority vegetation management programs. Although expenditures were significantly below original budget levels, PG&E exceeded the operational target by removing more than 31,000 trees, suggesting that implementation efficiency and program reprioritization allowed operational performance to continue without reduction in mitigation outcomes.
- VM-01 LiDAR Data Collection – Transmission and VM-14 Second Patrol – Transmission highlighted challenges associated with LiDAR cost allocation and vendor pricing. PG&E clarified that LiDAR expenses were split between VM-01 and VM-14 and acknowledged that additional emphasis is being placed on improving future cost allocation accuracy between initiatives. VM-01 additionally reflected broader concerns regarding increasing contract pricing for data processing and analytics support, prompting PG&E to revise future forecasting methodologies and transition these functions to internal resources beginning in the 2026–2028 WMP cycle.
- VM-18 Vegetation Management for Operational Mitigations (VMOM) also experienced an overrun associated with increased tree work complexity, challenging terrain, permitting requirements, and larger-than-expected trees in the Sierra and Central Valley regions. PG&E acknowledged that original forecasting assumptions overestimated anticipated operational efficiencies, resulting in higher actual unit costs during field execution.

Key Trends and Funding Compliance: Several significant trends emerged throughout the funding verification review of vegetation management initiatives.

- Many variances reflected deliberate reallocation of funding between vegetation management programs rather than reductions in wildfire mitigation execution. VM-03 and VM-04 both demonstrated how funding was formally shifted through internal planning and

change-control processes to support higher-priority vegetation management activities such as Distribution Routine, Second Patrol, VMOM, and Distribution VC. These reallocations suggest that PG&E actively adjusted funding priorities during implementation to support operational wildfire mitigation needs.

- Increased operational scope and inspection volumes consistently contributed to major overruns. VM-02, VM-13, VM-16, VM-17, and VM-18 all experienced increased costs due to expanded inspection activities, additional mitigation scope, enhanced oversight presence, Reliability Blitz work, or higher-than-anticipated tree work complexity. In most cases, the increased expenditures directly corresponded with expanded operational performance and achievement of wildfire mitigation objectives.
- Multiple initiatives demonstrated operational efficiencies and workflow improvements that reduced costs without negatively affecting performance outcomes. VM-15 benefited from reduced vegetation volumes due to prior right-of-way clearing activities, while inspection-related programs leveraged workflow enhancements, improved scheduling, and internal resource optimization to reduce labor and contractor costs. These efficiencies generally resulted in underruns while operational targets continued to be met or exceeded.
- The review identified a growing emphasis on internalization of work and reduction of contractor dependency. VM-01 specifically noted that future LiDAR data processing and analytics work will transition to internal resources due to rising external contract pricing pressures. Similar themes were identified in prior inspection and quality assurance initiatives involving increased onboarding of internal personnel and reduced contractor reliance.

PG&E maintained funding compliance and continued to align expenditures with wildfire mitigation objectives despite substantial financial variances. Variances were consistently supported by operational explanations, formal budget reallocations, revised implementation strategies, expanded work scope, or documented efficiency gains. Across the reviewed initiatives, PG&E consistently met or exceeded operational targets, and there was limited evidence that underruns or funding reallocations negatively impacted intended wildfire mitigation effectiveness or vegetation management outcomes.

4.3 SITUATIONAL AWARENESS AND FORECASTING

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.3.1 Initiative Summary Table

Table 46: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ¹⁸	Sample Validation Rate (%) ^{19 20}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{21 22}	WMP – Planned Spend (\$) ²³	EC-Claimed Actual Spend (\$) and % from budget) ²³	Satisfied Risk Reduction Goal? ²⁴
SA-02, 8.3.3.1, Line Sensor – Installations	Line Sensors Installed on 40 Circuits	Line Sensors Installed on 45 Circuits	Complete	20 Line Sensors	100%	Line Sensor Installation Log (Frontload Data) 20 Line Sensor Records (DR039)	113%	\$2,349	\$1,834 (-21.9%)	TBD
SA-05, 8.3.6.3, Evaluate FPI and IPW Modeling Enhancements	Evaluate Enhancements to the FPI Model and the IPW Model	The 2024 Version 5 models leveraged the latest published science and research to inform PG&E’s PSPS program. The white paper titled, "Public Safety Power Shutoff: Models and Guidance for Decision Making," provides an overview of the Version 5 models and framework made operational on August 1st, 2024.	Complete	N/A	N/A	Wildfire Risk Governance Committee July 18, 2024 PSPS Models & Guidance for Decision Making Rev. 1.1 (DR003 Remaining Frontload Data)	100%	\$4,861	\$3,631 (-25.3%)	No Goal Provided

¹⁸ N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

¹⁹ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

²⁰ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

²¹ The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.

²² Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.

²³ For entries with “Not Reported on Table 4 of the 2025 EC AIR,” the IE requested more information in DR005. PG&E informed the IE that these initiatives are considered “Provider Cost Center (PCC) Costs” and deal with qualitative initiative work and PG&E does not track specific costs for these initiatives to report on.

²⁴ “No Goal Provided” is listed when the 2023-2025 WMP does not contain any information on % Risk Impact (% Risk Reduction Goal or TBD or N/A). “TBD” and “N/A” are entries that PG&E utilizes for certain initiative’s % Risk Impact and is not an IE determination, but rather a determination made by PG&E.



SA-07, 8.3.2.3, Monitor and Evaluate the Cameras AI System's Performance	In partnership with Digital Path, monitor and evaluate the AI system's performance. Explore additional features and inputs to further enhance the system. At present we do not know what these enhancements will be specifically, however we will look for opportunities to explore best practices and incorporate enhancements with the vendor.	In partnership with Digital Path, we monitored and evaluated the AI system's performance and explored additional features to further enhance the system. All vendor reports expected were received by 11/26/2025.	Complete	N/A	N/A	ALERTWest Hit Tracker Digital Path Road Map Update HD Camera AI Automated Fire Detection (DR003 Remaining Frontload Data)	100%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	No Goal Provided
SA-09, 8.3.3.1, EFD and DFA Reporting	Perform a feasibility study on the use of EFD/DFA technologies to successfully identify incipient failures as a supplement to field inspections. If feasible, complete a data driven proposal for integrating sensor findings into the inspection program.	A feasibility study on the use of EFD/DFA technologies to successfully identify incipient failures as a supplement to field inspections.	Complete	N/A	N/A	SA-09 EFD and DFA Reporting Analysis (DR003 Remaining Frontload Data)	100%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	No Goal Provided
SA-10, 8.3.3.1, Distribution Fault Anticipation (DFA) – Installations	DFAs Installed on 15 Circuits	DFAs Installed on 17 Circuits	Complete	15 DFAs	100%	DFA Installation Log (Frontload Data) DFA Serial Number and First Comm. Table Circuit Screenshots from the DFA Portal (DR043)	113%	\$2,861	\$3,154 (10.2%)	Yes 5.1% Eyes-On
SA-11, 8.3.3.1, Early Fault Detection (EFD) – Installations	EFDs Installed on 4 Circuits	EFDs Installed on 4 Circuits	Complete	4 EFDs	100%	EFD Sap Completion Log EFD Unique Data Log EFD Circuits & Associated Mileage (Frontload Data) SAP Record of Completion (DR044)	100%	\$6,677	\$7,347 (10.0%)	Yes 2.8% Eyes-On



4.3.2 Written Detail for Initiatives

4.3.2.1 Initiative Review – Findings & Method

SA-02 – 8.3.3.1 Line Sensor Installations – Non-Focus and Non-Field Verifiable

PG&E is committed to installing line sensor devices on various circuits. These sensors provide detection and assist in locating faults. They can be integrated into analytics platforms, allowing the EC to analyze data and calculate an approximate area of possible fault or disturbance based on the circuit model impedance with the power flow tool.

The WMP set a target of line sensor installations on 40 circuits in 2025. PG&E did not provide a risk reduction goal for this initiative. With the frontload data, PG&E provided a spreadsheet indicating line sensor installation across 45 circuits ranging from tier 2 to tier 3 HFTD. Records included information such as AOR, Division, Circuit, Reported County, HFTD 2 Miles, HFTD 3 Miles, and Reported Tier. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 4.34% Eyes-on-Risk achieved.

The IE requested documentation of completed line sensor installations in DR039, with approximately six installations from HFTD Tier 2 and approximately 14 installations from HFTD Tier 3. PG&E responded by providing 27 PDF files. These files included pages from ER Notifications, Line Sensor Installation Sheets, and Form TD-2504P-01-F01, which is PG&E's Distribution Construction Completion Standards Checklist. All reports indicate that three-line sensors were installed at each location. Multiple circuits had more than one location where line sensors were installed.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 47: Line Sensor Installations

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload & DR039 Response	Initiative Validation Rate
40 Circuits – Line Sensors	N/A	45 Circuits – Line Sensors	45 Circuits – Line Sensors	113%

SA-05 – 8.3.1.1 Evaluate FPI (Fire Potential Index) and IPW (Ignition Probability Weather) Modeling Enhancements – Non-Focus and Non-Field Verifiable

This initiative evaluates enhancement to the Fire Potential Index (FPI) and Ignition Probability Weather (IPW) models. Although no specific risk reduction percentage is attributed, improvements aim to bolster wildfire risk forecasting capabilities.

In support of Initiative SA-05, PG&E was asked to provide whitepaper and/or any other associated documentation detailing an evaluation of enhancement to the FPI and IPW models had occurred during 2025. The utility responded with a 41-page document from the Wildfire Risk Governance Committee (WRGSC) meeting on July 18, 2024. This document outlines WRGSC Decision Outcomes which included the approval to implement FPI, OPW and IOPW V5.0 models and

updated PSPS guidance. This document included a granular presentation and analysis of the benefits to model enhancements and how they relate to satellite fire detection data and weather modeling. PG&E also provided a 99-page document titled “Public Safety Power shutoff: Models and Guidance for Decision Making” dated August 2024 (REV.1.1). Among other PSPS topics, FPI and IPW models were outlined in detail to include an introduction of each model, formulations, features, statistical validations, and each model’s rating scales.

Based on this analysis and the documentation reviewed, the IE has validated this initiative.

Table 48: Evaluate FPI (Fire Potential Index) and IPW (Ignition Probability Weather) Modeling Enhancements

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data (DR003) Response	Initiative Validation Rate
Evaluate enhancements to the FPI and IPW models.	August 2024 – Version 5 models were deployed.	Completed in Q2 of 2025.	WRGSC Meeting/ PSPS Document (8/24)	100%

SA-07 – 8.3.1.1 Monitor and Evaluate the Camera’s AI System’s Performance – Non-Focus and Non-Field Verifiable

This initiative outlines the monitoring and evaluation of HD camera AI automated fire detection performance for PG&E. Although no specific risk reduction percentage is attributed, improvements and enhancements aim to bolster wildfire risk forecasting capabilities.

In support of Initiative SA-07, PG&E was asked to provide whitepaper and/or any other associated documentation detailing an evaluation of enhancements to the camera AI system had occurred during 2025. The utility responded with an Excel spreadsheet titled “PGE_DR-003_20260403_SA-07 RESPONSE_Q001_ATCH019_CONF” which contained four anomalies containing data such as ALERTWest ID#, First AI Hit, First Operational AI Hit, Anomaly Location, Unique Fire ID and links to the actual photos of the AI hits. PG&E also provided two documents which outlined the Digital Path HD Camera AI Automated Fire Detection – roadmap updates dated December 2, 2025, and the final statistical counts by month. The IE was able to establish that the counts provided equated to fires experienced by month in 2025.

Based on this analysis and the documentation reviewed, the IE has validated this initiative.

Table 49: Monitor and Evaluate the Camera's AI System's Performance

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data (DR003) Response	Initiative Validation Rate
In partnership with Digital Path, monitor and evaluate the AI system's performance and explore additional features/inputs to further enhance the system.	Monitored and evaluated the AI system's performance – all vendor reports expected were received by 11/26/25.	Completed	Monitored and evaluated the AI system's performance	100%

SA-09 – 8.3.3.1 EFD and DFA Reporting – Non-Focus and Non-Field Verifiable

Early Fault Detection (EFD) using Radio Frequency (RF) sensors and Distribution Fault Anticipation (DFA) are technologies that PG&E has been deploying as part of the 2023-2025 WMP. These technologies, individually, and in combination with other sensors provide real-time monitoring capability of the grid. Initiative SA-09 is intended to perform a study on the ability of EFD and DFA technologies to successfully identify incipient failures and the feasibility of using them as a supplement to field inspections. The two phases of the study include analysis of sensor alert severity classification vs actual damage severity on existing DFA/EFD deployments, and correlation study between sensor-based findings and overhead/aerial inspection results.

The WMP set a target of a feasibility proposal for integrating sensor findings into the inspection program. No risk reduction goal was provided with this initiative. Data provided in the frontload request consisted of an EFD and DFA Reporting Analysis. The report included overview of EFD and DFA technologies, a Phase 2 methodology, along with results, conclusions, and recommendations. The study's conclusion indicated that there is currently a weak correlation between EFD findings versus inspection findings and can be attributed to a small sample size of deployed sensor population, lack of sensor coverage on tap lines, assumption that all visual findings of electrical assets equates to electrical asset degradation, and the need for additional adjustment and aligning based on circuit characteristics.

Recommendations set forth in the study involve expanding and refining Early Fault Detection (EFD) technology deployment to validate its effectiveness in identifying electrical asset defects. Backfilling previously deployed circuits with EFD Tap units, partnering with the vendor to enhance sensor accuracy through APIs and machine learning, and achieving sufficient circuit coverage to enable statistically meaningful comparisons between visual inspections and RF (radio frequency) detections. Success will be measured by monitoring correlated defects over time to confirm whether EFD can reliably track asset condition changes remotely and correlate RF discharge activity with observable physical deterioration.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 50: EFD and DFA Reporting

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Perform a feasibility study on the use of EFD/DFA technologies to successfully identify incipient failures as a supplement to field inspections. If feasible, complete a data driven proposal for integrating sensor findings into the inspection program.	A feasibility study on the use of EFD/DFA technologies to successfully identify incipient failures as a supplement to field inspections.	N/A	A Feasibility Study was Conducted	100%

SA-10 – 8.3.3.1 Distribution Fault Anticipation (DFA) Installations – Focus and Non-Field Verifiable

Distribution Fault Anticipation (DFA) is a technology that PG&E has been deploying as part of the 2023-2025 WMP. This technology, individually and in combination with other sensors, provides real-time monitoring capability of the grid.

The WMP set a target of DFA installations across 15 circuits in 2025. PG&E provided a risk reduction goal of 5.1% Eyes-on-Risk. Data provided in the frontload request consisted of a spreadsheet with three tabs, SA-10 HFTD Miles, HFTD Miles, and 20240610_HFTDMiles. These tabs included information such as division, county, circuit name, circuit ID, OH miles, UG miles, and HFTD miles. On tab SA-10 HFTD Miles, the data indicated 17 unique circuit names. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 6.17% Eyes-on-Risk achieved.

The IE requested documentation for completion for DFA installations for all circuits completed in 2025 in DR043. PG&E responded by providing a PDF table of 17 rows with Serial Number, Monitor ID, Substation, Circuit Number, and First Communication Datetime in UTC and PST. All dates under First Communication were in 2025 and ranged from February to December. The Circuit Number provided in the sampling response matches the circuits requested from the frontload data. PG&E also provided a PDF with screenshots of the monitoring system showing devices online. The serial number in the screenshots was cross-referenced with the serial number in the table for consistency, confirming alignment with the items requested from the frontload data. The status for each DFA in the data for all devices was online.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 51: DFA Installations

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR043 Response	Initiative Validation Rate
DFAs Installed on 15 Circuits	N/A	DFAs Installed on 17 Circuits	DFAs Installed on 17 Circuits	113%

SA-11 – 8.3.3.1 Early Fault Detection (EFD) Installations – Non-Focus and Non-Field Verifiable

Early Fault Detection (EFD) is a technology that PG&E has been deploying as part of the 2023-2025 WMP. This technology, individually and in combination with other sensors, provide real-time monitoring capability of the grid.

The WMP set a target of EFD installations across 4 circuits in 2025. PG&E provided a risk reduction goal of 2.8% Eyes-on-Risk. Data provided in the frontload request consisted of three spreadsheets. One contained data for each EFD installation on a specific circuit and included PM Order #, SAP status, and SAP completion date indicating installation of the device. A second spreadsheet contained the same circuits and included the EFD name, associated serial number, version, cellular provider, and installation time. Across all four circuits, a total of 331 unique EFD names and serial numbers was identified. A final spreadsheet contained the same four circuits and circuit mileage totals across HFTD and HHZ. PG&E's Table 3a in the 2025 EC AIR reports a corresponding Risk Impact of 3.11% Eyes-on-Risk achieved.

The IE requested documentation for completion for EFD installations for all circuits completed in 2025 in DR044. PG&E responded by providing two (2) PDFs with screenshots of the monitoring system showing devices online. The Number and Order Number in the screenshots was cross-referenced with the Notification and PM Order in the first frontload spreadsheet for consistency.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 52: EFD Installations

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR044 Response	Initiative Validation Rate
EFDs Installed on 4 Circuits	N/A	EFDs Installed on 4 Circuits	EFDs Installed on 4 Circuits	100%

4.3.2.2 Funding Verification – Findings

SA-02 – Line Sensor - Installations

Strategic Overview and Risk Mitigation

This initiative involved installing line sensor devices on circuits feeding into HFTD and HFRA. These sensors provide detection and assist in locating faults and can be integrated into analytics

platforms, allowing the EC to analyze data and calculate an approximate area of possible fault or disturbance based on the circuit model impedance with the power flow tool. PG&E set a target of line sensor installations on 40 circuits and stated “TBD” as a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$2,349,000
- Actual Expenditure: \$1,834,000
- Variance: -\$515,000 (22% Underrun)
- PG&E Justification: PG&E states that they met their WMP commitment to install line sensors on 40 circuits with fewer installations than originally forecasted.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by installing line sensor devices on 45 circuits ranging from tier 2 to tier 3 HFTD. Although PG&E did not establish risk reduction goal for this initiative, their implementation of this initiative supports progress toward wildfire mitigation objectives.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets. The underrun was attributable to fewer installations than originally forecasted.

SA-05 – Evaluate FPI and IPW Modeling Enhancements in 2023-2025

Strategic Overview and Risk Mitigation

This initiative involved evaluating enhancements to the Fire Potential Index (FPI) and Ignition Probability Weather (IPW) models. PG&E did not establish a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$4,861,000
- Actual Expenditure: \$3,631,000
- Variance: -\$1,230,000 (25% Underrun)
- PG&E Justification: The 2025 EC AIR states that in-year changes shifted actual from expense to capital. PG&E was asked to detail what costs were shifted due to these in-year changes and to confirm that the \$2,506 for Capital reflects these shifts from Expense. In addition, PG&E was asked if the 2026-2028 WMP forecast had been adjusted to account for the pre-ordering of weather stations for 2026 installations captured under 2025. PG&E explained that development and deployment costs associated with running, testing, and validating the new SAPP/Numerical Weather Prediction system from January 1, 2025, through August 12, 2025, were ultimately reclassified from Capital to Expense following review and approval by Capital Accounting. PG&E also clarified that pre-ordering materials represents an incremental program cost and is only pursued when the program is confident it can absorb the additional expense. As a result, forecast updates are made during the current year rather than incorporated into future-year forecasts.

Operational Impact and Risk Reduction

PG&E met its operational goal providing a document from the Wildfire Risk Governance Committee (WRGSC) meeting on July 18, 2024, which outlined WRGSC Decision Outcomes which included approval to implement FPI, OPW and IOPW V5.0 models and updated PSPS guidance. Although PG&E did not establish risk reduction goal for this initiative, their implementation of this initiative supports progress toward wildfire mitigation objectives.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The underrun was driven by in-year accounting changes that reclassified certain SAPP/Numerical Weather Prediction system development, testing, and validation costs from Capital to Expense following review by Capital Accounting. PG&E also noted that pre-ordering weather station materials is treated as an incremental current-year program cost rather than being incorporated into future-year forecasts.

SA-07 – Monitor and Evaluate the Camera AI System’s Performance

Strategic Overview and Risk Mitigation

This initiative involved the monitoring and evaluation of HD camera AI automated fire detection performance for PG&E. PG&E did not establish a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met its operational goal through providing anomaly records and documents which outline the Digital Path HD Camera AI Automated Fire Detection roadmap updates dated December 2, 2025, and the final statistical counts by month. Although no specific risk reduction percentage is attributed, improvements and enhancements aim to bolster wildfire risk forecasting capabilities.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

SA-09 – EFD and DFA Reporting

Strategic Overview and Risk Mitigation

This initiative involved performing a study on the ability of EFD and DFA technologies to successfully identify incipient failures and the feasibility of using them as a supplement to field inspections. PG&E set a target to perform the study and to complete a feasibility proposal for integrating sensor findings into the inspection program. PG&E did not establish a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met its operational goal through providing an EFD and DFA Reporting Analysis to include an overview of EFD and DFA technologies, a Phase 2 methodology, along with results, conclusions, and recommendations. Recommendations set forth in the study involved expanding and refining Early Fault Detection (EFD) technology deployment to validate its effectiveness in identifying electrical asset defects. Although no specific risk reduction percentage is attributed, improvements and enhancements aim to bolster wildfire risk forecasting capabilities.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

SA-10 – Distribution Fault Anticipation (DFA) - Installations

Strategic Overview and Risk Mitigation

This initiative involved the installation of Distribution Fault Anticipation (DFA) technology to detect potential faults before they occur. This technology, individually and in combination with other sensors, provides real-time monitoring capability of the grid. PG&E set a target of DFA installations across 15 circuits, aiming to achieve a 5.1% eyes-on risk impact goal.

Financial Performance Analysis

- Planned Budget: \$2,861,000
- Actual Expenditure: \$3,154,000
- Variance: \$293,000 (10% Overrun)
- PG&E Justification: PG&E states that they required additional units to achieve its eyes-on-risk target.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by completing DFA installations across 17 circuits, thus achieving the 5.1% eyes-on risk impact goal.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operational targets. The reported overrun was attributable to requiring additional units to achieve its eyes-on-risk target.

SA-11 – Early Fault Detection (EFD) - Installations

Strategic Overview and Risk Mitigation

This initiative involved the installation of Early Fault Detection (EFD) technology. This technology, individually and in combination with other sensors, provides real-time monitoring capability of the grid. PG&E set a target of EFD installations across 4 circuits, aiming to achieve a 2.8% eyes-on risk impact goal.

Financial Performance Analysis

- Planned Budget: \$6,677,000
- Actual Expenditure: \$7,347,000
- Variance: \$670,000 (10% Overrun)
- PG&E Justification: PG&E states that they erroneously underfunded this activity during budget-setting; however, they continued to execute the work in alignment with its WMP commitment.

Operational Impact and Risk Reduction

PG&E met its operational goal by completing EFD installations across 4 circuits, thus achieving the 2.8% eyes-on risk impact goal.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets. The overrun resulted from an error during the budget-setting process in which the activity was underfunded yet implementation of work continued.

4.3.3 Synthesis of Findings

4.3.3.1 Initiative Review

All 6 situational awareness and forecasting initiatives met or exceeded their 2025 WMP targets, representing 100% target achievement across the category. SA-02 (Line Sensor Installations) exceeded its target by 13% (45 circuits vs. 40 circuit target), SA-10 (DFA Installations) exceeded by 13% (17 circuits vs. 15 circuit target), while SA-11 (EFD Installations) met its target exactly (4 circuits). Three initiatives (SA-05, SA-07, SA-09) were qualitative evaluation and reporting commitments rather than quantitative deployment targets, with SA-05 completing FPI/IPW model enhancements by deploying Version 5.0 models in August 2024, SA-07 completing AI camera system performance monitoring with all vendor reports received by November 26, 2025, and SA-09 completing an EFD/DFA feasibility study concluding weak correlation between sensor findings and inspection findings due to small sample size and limited tap line coverage.

PG&E demonstrated a continued emphasis on advanced monitoring technologies and predictive analytics as part of its wildfire mitigation strategy. Multiple initiatives involved deployment or

evaluation of line sensors, DFA systems, EFD technologies, HD camera AI systems, and enhanced wildfire forecasting models designed to improve real-time situational awareness and wildfire risk detection capabilities. SA-07 and SA-09 focused heavily on performance evaluation, anomaly tracking, deployment feasibility, and long-term analytical improvements intended to guide future wildfire detection and forecasting strategies. These initiatives demonstrate a broader organizational trend toward data-driven wildfire mitigation planning and technology-assisted operational decision-making.

4.3.3.2 Funding Verification

Budget and Expenditure Summary: The Situational Awareness and Forecasting category had a total planned budget of \$16,748,000 with actual expenditures of \$15,966,000, representing a 4.67% variance under budget. The category's overall expenditure remained within 10% of the planned budget.

Initiatives with Significant Variances: Of the 6 total initiatives in this category, 4 (66.67%) had absolute percent differences exceeding 10%. Several initiatives demonstrated significant financial variances:

- SA-05 Evaluate FPI and IPW Modeling Enhancements represented one of the more notable underruns within the reviewed situational awareness initiatives. The variance was primarily driven by accounting reclassification activity involving development, testing, and validation costs for the SAPP/Numerical Weather Prediction system. PG&E explained that these costs were ultimately reclassified following review by Capital Accounting, affecting the distribution of expenditures between capital and expense categories rather than reducing operational implementation. Importantly, PG&E successfully completed implementation of the updated FPI, OPW, and IOPW V5.0 models and updated PSPS guidance despite the financial variance.
- SA-10 Distribution Fault Anticipation Installations represented a targeted operational overrun driven by expanded deployment requirements. PG&E installed DFA technology across 17 circuits rather than the originally planned 15 circuits in order to achieve the initiative's 5.1% eyes-on-risk target. The overrun therefore reflected additional operational execution rather than inefficiency or uncontrolled spending.
- SA-11 Early Fault Detection Installations similarly experienced an overrun attributable to an underfunded original budget. PG&E acknowledged that the initiative had been underestimated during budget development but continued implementation to ensure compliance with WMP commitments. The initiative ultimately achieved its operational deployment target and associated risk reduction objective despite the budget shortfall.

Key Trends and Funding Compliance: Several important trends emerged throughout the funding verification review of situational awareness and fault detection initiatives.

- Accounting adjustments and forecasting methodology refinements significantly influenced reported variances. SA-05 illustrated how in-year accounting reclassifications between capital and expense categories can materially affect reported expenditures without altering operational implementation. PG&E also indicated that forecasting methodologies continue

to evolve in response to changing operational conditions, pre-ordering strategies, and deployment timing considerations.

- Several overruns were directly associated with expanded deployment scope required to achieve operational risk mitigation objectives. SA-10 demonstrated that additional installations were necessary to meet eyes-on-risk targets, while SA-11 highlighted how underestimation during budget-setting required continued implementation despite insufficient original funding allocations. These examples suggest that operational wildfire mitigation priorities frequently remained the primary driver of implementation decisions regardless of initial budget assumptions.

PG&E maintained funding compliance and appropriately aligned expenditures with wildfire mitigation and situational awareness objectives. Variances were consistently supported through operational explanations, accounting adjustments, deployment changes, or evolving forecasting methodologies. Across the reviewed initiatives, PG&E met or exceeded operational targets, and there was limited evidence that financial variances negatively affected wildfire detection capabilities, operational readiness, or intended wildfire mitigation outcomes.

4.4 EMERGENCY PREPAREDNESS

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.4.1 Initiative Summary Table

Table 53: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ²⁵	Sample Validation Rate (%) ^{26, 27}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{28, 29}	WMP – Planned Spend (\$) ³⁰	EC-Claimed Actual Spend (\$ and % from budget) ³⁰	Satisfied Risk Reduction Goal? ³¹
EP-01, 8.4.2.3.1, Complete PSPS and Wildfire Tabletop and Functional Exercises	Complete PSPS and Wildfire Tabletop and Functional Exercise	4 PSPS and Wildfire Tabletop and Functional Exercises	Complete	4 Exercises	100%	PG&E EOC Incident Action Plan (DR003 Remaining Frontload Data)	200% ³²	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	No Goal Provided
EP-02, 8.4.3.1, Maintain All Hazards Planning & Preparedness Programs	Maintain the All Hazards Planning and Preparedness Program to provide emergency response and safely and expeditiously restore service.	Maintained the All-Hazards Planning and Preparedness Program through compliance reporting within the GO 166 filing on April 30, 2025.	Complete	N/A	N/A	PG&E GO 166 Annual Filing on April 30, 2025 (DR003 Remaining Frontload Data)	100%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	No Goal Provided
EP-04, 8.4.3.1, Expand All Hazards Planning to Include Additional Threats and Scenarios	Expand the All Hazards planning program to include additional threats and scenarios.	Expanded all hazard planning by adding two new Hazard Annexes to the CERP. These include one to support Capacity Shortage events and one to support Volcano events.	Complete	N/A	N/A	Capacity Shortage Annex Volcano Annex (DR003 Remaining Frontload Data)	100%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	No Goal Provided

²⁵ N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

²⁶ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

²⁷ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

²⁸ The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.

²⁹ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.

³⁰ For entries with “Not Reported on Table 4 of the 2025 EC AIR,” the IE requested more information in DR005. PG&E informed the IE that these initiatives are considered “Provider Cost Center (PCC) Costs” and deal with qualitative initiative work and PG&E does not track specific costs for these initiatives to report on.

³¹ “No Goal Provided” is listed when the 2023-2025 WMP does not contain any information on % Risk Impact (% Risk Reduction Goal or TBD or N/A). “TBD” and “N/A” are entries that PG&E utilizes for certain initiative’s % Risk Impact and is not an IE determination, but rather a determination made by PG&E.

³² The WMP has a target of completing PSPS and Wildfire Tabletop and Functional Exercises annually, implying two exercises are required for 2025. Data provided by PG&E indicates four exercises took place in 2025, resulting in a 200% Initiative Validation Rate ($4 \times \frac{1}{2} = 2 \times 100 = 200\%$).



Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ²⁵	Sample Validation Rate (%) ^{26, 27}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{28, 29}	WMP – Planned Spend (\$) ³⁰	EC-Claimed Actual Spend (\$ and % from budget) ³⁰	Satisfied Risk Reduction Goal? ³¹
EP-06, 8.4.3.1, Review & Revise CERP and the Two Wildfire-Related Annexes	Update 3 documents (1 CERP and 2 wildfire-related annexes)	3 Documents Updated	Complete	3 Documents	100%	CERP PSPS Annex Wildfire Annex (Frontload Data Response)	100%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	N/A
PS-01, 9.2.1, Evaluate Enhancements for the PSPS Transmission Guidance	Evaluate enhancements for the PSPS Transmission guidance to enhance focus of PSPS events.	Changes to the PSPS input models occurred since last season, sensitivity analysis was performed, and new guidance was presented to the Wildfire Risk Governance Steering Committee (WRGSC).	Complete	N/A	N/A	PG&E Transmission PSPS Models & Guidance Change Detail (DR003 Remaining Frontload Data)	100%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	No Goal Provided
PS-02, 9.2.1, Evaluate Incorporation of Approved IPW Enhancements into the PSPS Distribution Guidance	Evaluate incorporation of approved IPW enhancements into the PSPS Distribution guidance to enhance focus of PSPS events.	Changes to the PSPS input models occurred since last season, sensitivity analysis was performed, and new guidance was presented to the WRGSC.	Complete	N/A	N/A	Distribution PSPS 5.5 Models (DR003 Remaining Frontload Data)	100%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	No Goal Provided
PS-06, 8.5.3, Provide Portable Batteries to PG&E Customers	3,300 Portable Batteries	3,798 Portable Batteries	Complete	34 Portable Batteries	100%	Three Battery Delivery Lists (Frontload Data Response) 44 Battery Records (DR036)	115%	\$12,795	\$5,043 (-60.6%)	N/A
PS-07, 9.1.5, Reduce PSPS Impacts	13,000 Customer Events Mitigated	13,327 Customer Events Mitigated	Complete	137 Customer Events	100%	Customers Mitigated per Device or UG (Frontload Data Response)	103%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	N/A
PS-10, 9.1.3, Continue Sharing PSPS Lessons Learned	Continue sharing PSPS lessons learned and best practices with CA IOUs through monthly meetings focused on PSPS (12 meetings).	12 Joint Utility PSPS Working Group Meetings	Complete	12 Working Groups	100%	12 Joint Utility Working Group Filings (DR003 Remaining Frontload Data)	100%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	No Goal Provided

4.4.2 Written Detail for Initiatives

4.4.2.1 Initiative Review – Findings & Method

EP-01 – 8.4.2.3.1 & Complete PSPS and Wildfire Tabletop and Functional Exercises – Non-Focus and Non-Field Verifiable

EP-01's objective is to enhance PG&E's readiness for potential wildfire events and Public Safety Power Shutoffs (PSPS) through structured simulations and scenario-based training. These emergency preparedness exercises allow participants to practice the duties, tasks, and operations they are expected to perform in a real emergency. PG&E stated a goal of completing PSPS and Wildfire Tabletop Functional Exercises, implying a target of two events for 2025 and did not provide a risk reduction goal for this initiative.

According to PG&E's 2025 EC AIR, the utility performed four emergency preparedness exercises in 2025. One PSPS Tabletop Exercise on March 27, 2025; one PSPS FSE Exercise on April 28, 2025; One Wildfire Tabletop Exercise conducted on March 27, 2025; and One Wildfire Functional Exercise conducted from April 28 -through May 2, 2025. All After-Action Reports were completed on June 23, 2025. PG&E provided the EOC Incident Action Plan (Exercise) for the exercise PSPS & Wildfire FSE PSPS Event on April 28, 2025. The plan included incident objectives, EOC organization roster, resources, communication plans, EOC medical plan, EOC organization chart, safety message, incident summary, IMET weather Forecast, and EOC Meeting schedule.

The IE identified no issues or discrepancies during this review. Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 54: Complete PSPS and Wildfire Tabletop and Functional Exercises

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data (DR003) Response	Initiative Validation Rate
Complete PSPS and Wildfire Tabletop and Functional Exercise	4 PSPS & Wildfire Tabletop & Functional Exercises	4 PSPS & Wildfire Tabletop & Functional Exercises	4 PSPS & Wildfire Tabletop & Functional Exercises	200%

EP-02 – 8.4.3.1 Maintain All Hazards Planning & Preparedness Programs – Non-Focus and Non-Field Verifiable

EP-02's objective is to maintain the All-Hazards planning and preparedness program to provide emergency response and safely and expeditiously restore service. PG&E did not provide a risk reduction goal for this initiative.

According to PG&E's 2025 EC AIR, the utility maintained the All-Hazards Planning and Preparedness Program through compliance reporting within the GO 166 filing which was filed on April 30, 2025. For the frontload data response, PG&E provided a 1,543-page annual compliance

report for compliance period January 1, 2024, to December 31, 2024. The document reports PG&E's compliance with the fourteen standards set forth by GO 166. The IE verified document publication on the CPUC General Order 166 Annual Reports website matches documentation provided and confirms the filing took place on April 30, 2025.

The IE identified no issues or discrepancies during this review. Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 55: Maintain All Hazards Planning & Preparedness Programs

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data (DR003) Response	Initiative Validation Rate
Maintain the All-Hazards Planning and Preparedness Program to provide emergency response and safely and expeditiously restore service.	Maintained the All-Hazards Planning and Preparedness Program through compliance reporting within the GO 166 filing on April 30, 2025.	Completed	All-Hazards Planning Filed on April 30, 2025	100%

EP-04 – 8.4.3.1 Expand All Hazards Planning to Include Additional Threats and Scenarios – Non-Focus and Non-Field Verifiable

The EP-04 objective is to expand the All-Hazards Planning and Preparedness Program to include additional threats and scenarios. PG&E did not provide a risk reduction goal for this initiative.

The initiative target for 2025 is to develop new annexes. According to PG&E's 2025 EC AIR, the utility expanded all hazard planning by adding two new Hazard Annexes to the CERP. These additions include one to support Capacity Shortage events and one to support Volcano events. For the frontload data response, the utility provided the aforementioned annexes added to the Company Emergency Response Plan (CERP). The Capacity Shortage Annex describes the response to a capacity shortage event, including preparations for emergency response, internal and external communications, and outage management for T&D, and substation operations. The Volcano annex describes the preparation, response, and communication plan, as well as PG&E's volcanic risk and associated hazard planning. PG&E views the threat of volcanic hazard as a "horizon scanning" risk that is unprecedented in the history of the company. Both documents cover procedures and protocols for organization and responsibility, concept of operations, coordination and communication, performance indicators, training and exercises, and after-action reports, event logs, and records.

The IE identified no issues or discrepancies during this review. Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 56: Expand All Hazards Planning to Include Additional Threats and Scenarios

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data (DR003) Response	Initiative Validation Rate
Expand the All Hazards planning program to include additional threats and scenarios.	Expanded all hazard planning by adding two new Hazard Annexes to the CERP. These include one to support Capacity Shortage events and one to support Volcano events.	Completed	Volcano & Capacity Shortage Annex 2025 (2 Annexes)	100%

EP-06 – 8.4.3.1 Review & Revise CERP and the Two Wildfire-Related Annexes – Non-Focus and Non-Field Verifiable

The EP-06 objective is to annually review, and revise if appropriate, the Company Emergency Response Plan (CERP) and the two wildfire-related annexes (the Wildfire Annex and the PSPS Annex). PG&E did not provide a risk reduction goal for this initiative.

The initiative target for 2025 is to update three documents, the CERP, the Wildfire Annex, and the PSPS Annex. According to PG&E's 2025 Q4 QDR, the utility updated the three aforementioned documents. For the frontload data response, the utility provided the CERP, Wildfire Annex, and PSPS Annex.

The CERP provided contains a published date of November 29, 2024, and is currently on version 10. Pages ix-xii provide a clear change history and no changes were recorded in 2025. Both the PSPS and Wildfire Annex are formatted similarly to the CERP document with a change record, however, no date is provided for the listed changes. The PSPS Annex has a published date of July 31, 2025, and is currently on version 10. The Wildfire Annex has a published date of April 1, 2025, and is currently on version 6. Cross referencing to the 2024 IE ARC, both the Wildfire and PSPS Annex report an updated publication date and document version, reflecting that a revision occurred to both documents during 2025.

The IE identified no issues or discrepancies during this review. Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 57: Review & Revise CERP and the Two Wildfire-Related Annexes

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Update 3 documents (1 CERP and 2 wildfire-related annexes)	N/A	3 Documents (1 CERP and 2 wildfire-related annexes)	3 Documents (1 CERP and 2 wildfire-related annexes)	100%

PS-01 – 9.1.2 Evaluate Enhancements for the PSPS Transmission Guidance – Non-Focus and Non-Field Verifiable

The PS-01 objective is to evaluate enhancements for the PSPS Transmission guidance to enhance focus of PSPS events. PG&E did not provide a risk reduction goal for this initiative.

The initiative target for 2025 is to evaluate enhancements for the PSPS Transmission guidance to enhance focus of PSPS events. According to PG&E's 2025 EC AIR, the utility made changes to the PSPS input models since last season, a sensitivity analysis was performed, and new guidance was presented to the Wildfire Risk Governance Steering Committee (WRGSC). For the frontload data response, PG&E provided the Transmission PSPS Models and Guidance – Change Detail. This document provides data associated with minimum fire potential conditions, Vegetation & electric asset notifications, catastrophic fire probability asset & vegetation, catastrophic fire behavior and PSPS event extent guidance and associated changes from the 5.0 Guidance to the 5.5 Guidance. PG&E indicates that the only changes made for Minimum Fire Potential Conditions (mFPC) from PSPS 5.0 to 5.5 is to lower FPI Probability Catastrophic due to changes in the distributions of predictions of the 5.5 model. The PSPS 5.5 mFPC was approved by WRGSC on August 7, 2025.

The IE identified no issues or discrepancies during this review. Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 58: Evaluate Enhancements for the PSPS Transmission Guidance

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data (DR003) Response	Initiative Validation Rate
Evaluate enhancements for the PSPS Transmission guidance to enhance focus of PSPS events.	Changes to the PSPS input models occurred since last season, sensitivity analysis was performed, and new guidance was presented to the Wildfire Risk.	Completed	Enhancements Evaluated for PSPS 5.5 Guidance	100%

PS-02 – 9.2.1 Evaluate Incorporation of Approved IPW Enhancements into the PSPS Distribution Guidance – Non-Focus and Non-Field Verifiable

The PS-02 objective is to evaluate incorporation of approved IPW enhancements into the PSPS Distribution guidance to enhance focus of PSPS events. PG&E did not provide a risk reduction goal for this initiative.

The initiative target for 2025 is to evaluate incorporation of approved IPW enhancements into the PSPS Distribution guidance to enhance focus of PSPS events. According to PG&E's 2025 EC AIR, the utility completed changes to the PSPS input models since last season, a sensitivity analysis, and that new guidance was presented to the WRGSC. For the frontload data response, PG&E provided the Wildfire Risk Governance Committee information distribution, PSPS 5.5 guidance, which was published on July 10, 2025. The document details the current PSPS 5.0 data on PSPS guidance with the planned PSPS 5.5 guidance and updates to the Fire Probability Index (FPI), Ignition Probability Weather Machine Learning Model (IPW), and a Machine Learning Model Evaluation Summary indicating that the 5.5 models show similar or slightly improved performance to the 5.0 models. PG&E was scheduled to present at WRGSC on August 21, 2025.

The IE identified no issues or discrepancies during this review. Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 59: Evaluate Incorporation of Approved IPW Enhancements into the PSPS Distribution Guidance

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data (DR003) Response	Initiative Validation Rate
Evaluate incorporation of approved IPW enhancements into the PSPS Distribution guidance to enhance focus of PSPS events.	Changes to the PSPS input models occurred since last season, sensitivity analysis was performed, and new guidance was presented to the WRGSC.	Completed	PSPS Distribution Guidance Enhancements – July 10, 2025	100%

PS-06 – 8.5.3 Provide Portable Batteries to PG&E Customers – Non-Focus and Non-Field Verifiable

PS-06 outlines PG&E's focus to reduce hardships for Access and Functional Needs (AFN) customers during PSPS events by delivering critical life-sustaining resources such as portable batteries.

PG&E's 2023-2025 WMP set a 2025 target to provide 3,300 new or replacement portable batteries. PG&E did not set a risk reduction goal for this initiative. According to the 2025 EC AIR, PG&E stated that 3,798 batteries have been provided to customers, exceeding the 2025 target.

In support of PS-06, PG&E provided a list of all batteries supplied to customers in 2025. The utility responded by submitting an Excel spreadsheet titled “PGE_PS-06_20260316_AUDIT_Q001_ATCH028_BCONF” which contained 187 records with associated details such as Account Number, name, Customer Address, HFTD/HFRA, Serial Number, solar panel model and serial numbers, and total batteries per delivery, indicating 282 total batteries delivered in 2025. PG&E also provided an Excel spreadsheet titled “PGE_PS-06_20260316_AUDIT_Q001_ATCH029_BCONF” which contained 1,637 records with associated details such as Install Date, Customer Name, Customer Address, Customer County, Battery Serial Number, and Battery Model. In addition, PG&E provided an Excel spreadsheet titled “PGE_PS-06_20260316_AUDIT_Q001_ATCH030_BCONF” which contained 1,014 records with associated details such as customer information, battery model, serial number, and delivery date, and a battery delivered total, indicating 1,879 total batteries delivered in 2025. Between all three spreadsheets, the total batteries delivered equals 3,798, verifying PG&E’s EC AIR reporting.

In DR036, PG&E was asked to provide documentation of completion for 44 battery deliveries which consisted of 4 from non-HFTD, 6 from Tier 2-HFTD and 34 from Tier 3-HFTD. PG&E provided “Acknowledgement of Equipment Receipt and Waiver and Release Agreement” documents for the 44 batteries requested. This document contains the customer’s name, account number, portable battery type, and serial number of the equipment. The IE was able to cross reference the asset data from the sampling information to the frontload data received and no discrepancies were noted.

Based on this analysis and the documentation reviewed, the IE has validated this initiative.

Table 60: Provide Portable Batteries to PG&E Customers

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR036 Response	Initiative Validation Rate
3,300 Batteries	3,798 Batteries	3,798 Batteries	3,798 Batteries	115%

PS-07 – 9.1.5 Reduce PSPS Impacts – Focus and Non-Field Verifiable

PS-07 outlines PG&E’s use of multiple performance metrics to evaluate the effectiveness of its Public Safety Power Shutoff (PSPS) Program. These metrics include tracking the frequency, scope, and duration of PSPS events, as well as measuring customer hours impacted by PSPS events per Red Flag Warning Overhead (RFW OH) circuit mile days. PG&E states that these performance indicators are intended to support evaluation of PSPS operational effectiveness, customer impacts, and overall program performance during elevated wildfire risk conditions. Metrics associated with the frequency, scope, and duration of PSPS events are significantly influenced by weather conditions, including the severity and extent of Red Flag Warning events, and customer impacts may fluctuate depending on prevailing meteorological conditions and the configuration of the electrical grid during each PSPS event.

PG&E aims to reduce PSPS impacts by roughly 38,000 customer events for the 2023-2025 WMP cycle. PG&E's 2023-2025 WMP set a 2025 target to mitigate 13,000 customer events based on wildfire mitigation projects including, but not limited to, MSO switch replacements and undergrounding miles planned for 2025. PG&E did not set a risk reduction goal for this initiative. According to the 2025 EC AIR 13,327 customer events were mitigated in 2025.

In support of PS-07, PG&E provided frontload documentation in the form of an Excel spreadsheet titled "PGE_PS-07_20260316_AUDIT_Q001_ATCH031_BCONF." The documentation included data indicating that approximately 13,327 customer events were mitigated through undergrounding efforts associated with 333.8 miles of completed undergrounding work. The spreadsheet also included information regarding the Asset and Vegetation Tag Multiplier, which represents the increase in PSPS scope resulting from areas being included for de-energization due to meeting minimum fire potential conditions in combination with the presence of specific high-priority asset and vegetation tags. PG&E indicated a 39.92 per mile Mitigated Customer Count after applying the tag multiplier. Q1 completed 23.88 miles of undergrounding resulting in 953 customers, Q2 completed 31.63 miles resulting in 1,263 customers, Q3 completed 97.47 miles resulting in 3,891 customers, and Q4 completed 180.83 miles resulting in 7,219 customers, totaling the 13,327 customer events claimed in the 2025 EC AIR. The total undergrounding miles detailed in the data matches the amount claimed by PG&E in the Q4 QDR. Refer to initiative GH-04 for details on PG&E's undergrounding efforts in 2025.

Based on this analysis and the documentation reviewed, the IE has validated this initiative.

Table 61: Reduce PSPS Impacts

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
13,000 Customer Events	13,327 Customer Events	9,219 Customer Events	13,327 Customer Events	103%

PS-10 – 9.1.3 Continue Sharing PSPS Lessons Learned – Non-Focus and Non-Field Verifiable

PS-10 outlines PG&E's objective to continue sharing Public Safety Power Shutoff (PSPS) lessons learned and industry best practices with California Investor-Owned Utilities (IOUs) through recurring monthly meetings focused on PSPS operations and wildfire mitigation coordination. In addition to discussing lessons learned from prior PSPS events, these meetings include discussions regarding improvements to customer and community notification processes, evaluation of tools and technologies that support safety outage decision-making, and assessment of PSPS criteria and operational practices.

PG&E's 2023-2025 WMP set a 2025 target to hold monthly meetings to share lessons learned with California IOUs. According to the 2025 EC AIR, Joint Utility Public Safety Power Shutoff Working Group meetings were held each month, and each joint working group report was submitted to the CPUC.

In support of PS-10, PG&E provided frontload documentation in the form of Joint Working Group Report of Southern California Edison, PG&E, and San Diego Gas & Electric report filings to the CPUC in 2025. Each report contained an introduction, description of the meeting including meeting date and time, attendees, and topics discussed. Some examples of topics were “External Engagement and Customer Experience”, “Emergency Management and PSPS Operations & Risk”, “Regulatory Compliance”, and “PSPS Activations”.

Based on this analysis and the documentation reviewed, the IE has validated this initiative.

Table 62 Continue Sharing PSPS Lessons Learned

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data (DR003) Response	Initiative Validation Rate
Continue sharing PSPS lessons learned and best practices with CA IOUs through monthly meetings focused on PSPS.	Monthly (12) Meetings	Monthly (12) Meetings	Monthly (12) Meetings	100%

4.4.2.2 Funding Verification – Findings

EP-01 – Complete PSPS and Wildfire Tabletop and Functional Exercises

Strategic Overview and Risk Mitigation

This initiative involved the enhancement of PG&E’s readiness for potential wildfire events and Public Safety Power Shutoffs (PSPS) through structured simulations and scenario-based training. These emergency preparedness exercises allow participants to practice the duties, tasks, and operations they are expected to perform in a real emergency. PG&E did not provide a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met the intent of this initiative by performing four emergency preparedness exercises in 2025 and completing after-action reports for each exercise. PG&E demonstrated readiness for potential wildfire events and PSPS operations by conducting both tabletop and functional

emergency response exercises, completing After-Action Reports to evaluate performance and identify improvements, and developing a comprehensive EOC Incident Action Plan that established incident objectives, staffing, communication protocols, resource coordination, weather forecasting, and operational scheduling procedures necessary to support emergency response activities.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

EP-02 – Maintain All Hazards Planning & Preparedness Programs in 2023-2025

Strategic Overview and Risk Mitigation

This initiative involved maintaining the All-Hazards planning and preparedness program to provide emergency response and safely and expeditiously restore service. PG&E did not provide a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met the intent of this initiative by maintaining the All-Hazards Planning and Preparedness Program through its compliance reporting within the GO 166 filing which was filed on April 30, 2025.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

EP-04 – Expand All Hazards Planning to Include Additional Threats and Scenarios

Strategic Overview and Risk Mitigation

This initiative involved expanding the All Hazards Planning and Preparedness Program to include additional threats and scenarios through developing new annexes. PG&E did not provide a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY

report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met the intent of this initiative through expanding all hazard planning by adding two new Hazard Annexes to the CERP. These additions include one to support Capacity Shortage events and one to support Volcano events. The Capacity Shortage Annex describes the response to a capacity shortage event, including preparations for emergency response, internal and external communications, and outage management for T&D, and substation operations. The Volcano annex describes the preparation, response, and communication plan, as well as PG&E’s volcanic risk and associated hazard planning.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

EP-06 – Review & Revise CERP and the two Wildfire-Related Annexes

Strategic Overview and Risk Mitigation

This initiative involved the annual review and revision, as appropriate, of PG&E’s Company Emergency Response Plan (CERP), including the Wildfire Annex and PSPS Annex, to ensure emergency response procedures remained current and aligned with wildfire and PSPS operational needs. PG&E did not provide a specific risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met the intent of this initiative through the publishing of the CERP document and both the PSPS and Wildfire annexes. The CERP contained a published date of November 29, 2024, and is currently on version 10. The PSPS Annex contained a published date of July 31, 2025, and is

currently on version 10. The Wildfire Annex contained a published date of April 1, 2025, and is currently on version 6.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

PS-01 – Evaluate Enhancements for the PSPS Transmission Guidance

Strategic Overview and Risk Mitigation

This initiative involved evaluating enhancements to PG&E’s PSPS Transmission guidance to improve the targeting and effectiveness of PSPS events. PG&E established a 2025 target to complete this evaluation process. PG&E did not provide a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met operational targets through changes made to the PSPS input models since last season, a sensitivity analysis being performed, and new guidance being presented to the Wildfire Risk Governance Steering Committee (WRGSC). Although direct numerical risk reduction was not assigned, strategic enhancement implementation directly supports effective long-term wildfire risk mitigation.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

PS-02 – Evaluate Incorporation of Approved IPW Enhancements into the PSPS Distribution Guidance

Strategic Overview and Risk Mitigation

This initiative involved evaluating the incorporation of approved IPW enhancements into the PSPS Distribution guidance to enhance focus of PSPS events. PG&E established a 2025 target to complete this evaluation process. PG&E did not provide a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY

report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met operational targets through completing changes to the PSPS input models since last season, a sensitivity analysis being performed, and new guidance being presented to the Wildfire Risk Governance Steering Committee (WRGSC). Although direct numerical risk reduction was not assigned, strategic enhancement implementation directly supports effective long-term wildfire risk mitigation.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

PS-06 – Provide Portable Batteries to PG&E Customers

Strategic Overview and Risk Mitigation

This initiative involved focusing on reducing hardships for Access and Functional Needs (AFN) customers during PSPS events by delivering critical life-sustaining resources such as portable batteries. PG&E set a target to provide 3,300 new or replacement portable batteries. PG&E did not set a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned Budget: \$12,795,000
- Actual Expenditure: \$5,043,000
- Variance: -\$7,752,000 (61% Underrun)
- PG&E Justification: PS-06 includes both the CFILC and Portable Battery Program initiatives. For CFILC, the budget was reduced in 2026 because batteries will no longer be distributed outside of PSPS events, with non-PSPS deliveries shifting to the Portable Battery Program, while existing inventory is expected to meet anticipated demand. For the Portable Battery Program, the reduced budget reflects significant 2025 underspending caused by the discontinuation of the previously purchased battery model and the use of batteries procured in 2024, along with a transition to smaller batteries that can be procured at lower cost while meeting UL 2743 requirements.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by providing 3,798 batteries to customers. Although direct numerical risk reduction was not assigned, reducing hardships for AFN customers directly supports effective wildfire mitigation support efforts.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operation targets. The underrun was driven by reduced battery distribution needs outside of PSPS events, the use of existing battery inventory procured in 2024, discontinuation of a previously purchased battery model, and a transition to lower-cost smaller batteries that meet UL 2743 requirements.

PS-07 – Reduce PSPS Impacts

Strategic Overview and Risk Mitigation

This initiative involved the use of multiple performance metrics to evaluate the effectiveness of PG&E's Public Safety Power Shutoff (PSPS) Program to support evaluation of PSPS operational effectiveness, customer impacts, and overall program performance during elevated wildfire risk conditions. PG&E set a target to mitigate 13,000 customer events based on wildfire mitigation projects including, but not limited to, MSO switch replacements and undergrounding miles planned for 2025. PG&E did not set a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as "PCC Costs" (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E exceeded its operational goal by mitigating 13,327 customer events. Although direct numerical risk reduction was not assigned, mitigating customer events through specific projects directly supports effective wildfire mitigation support efforts.

Assessment and Conclusion

PG&E effectively completed this initiative, exceeding operation targets.

PS-10 – Continue Sharing PSPS Lessons Learned

Strategic Overview and Risk Mitigation

This initiative involved PG&E's objective to continue sharing Public Safety Power Shutoff (PSPS) lessons learned and industry best practices with California Investor-Owned Utilities (IOUs) through recurring monthly meetings focused on PSPS operations and wildfire mitigation coordination. PG&E set a target to hold monthly meetings to share lessons learned with California IOUs. PG&E did not set a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met its goal by holding Joint Utility Public Safety Power Shutoff Working Group meetings were held each month, and each joint working group report was submitted to the CPUC. Although direct numerical risk reduction was not assigned, lessons learned with California IOUs directly supports effective wildfire mitigation support efforts.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operation targets.

4.4.3 Synthesis of Findings

4.4.3.1 Initiative Review

All nine Emergency Preparedness initiatives met or exceeded their 2025 WMP targets, representing 100% target achievement across the category. PS-06 (Portable Battery Provision) exceeded its target by 15% (3,798 batteries vs. 3,300 target), and PS-07 (Reduce PSPS Impacts) exceeded by 3% (13,327 customer events mitigated vs. 13,000 target), while all emergency planning initiatives (EP-01, EP-02, EP-04, EP-06) and PSPS guidance evaluation initiatives (PS-01, PS-02, PS-10) met qualitative completion targets.

PG&E demonstrated a strong emphasis on continuous improvement and refinement of emergency preparedness processes. Multiple initiatives involved recurring evaluations, updates, sensitivity analyses, after-action reviews, annex revisions, governance committee oversight, and lessons-learned coordination activities intended to strengthen operational readiness and wildfire response effectiveness over time. EP-01, EP-06, PS-01, and PS-02 particularly reflected a mature organizational focus on iterative emergency management improvement. EP-04 expanded preparedness planning to include new threat scenarios such as volcanic events and capacity shortages, while PS-10 Continue Sharing PSPS Lessons Learned demonstrated recurring coordination among California IOUs through monthly working group meetings and CPUC reporting. These efforts support broader statewide wildfire preparedness coordination and operational consistency.

4.4.3.2 Funding Verification

Budget and Expenditure Summary: The Emergency Preparedness category had a total planned budget of \$12,795,000 with actual expenditures of \$5,043,000, representing a 61% variance under budget. The category's overall expenditure exceeded the 10% variance threshold.

Initiatives with Significant Variances: Of the 9 total initiatives in this category, 1 (11.11%) had absolute percent differences exceeding 10%.

- PS-06 represented the only initiative with a significant documented financial variance. The 61% underrun reflected multiple operational efficiencies and inventory management improvements rather than reduced program execution. PG&E explained that existing inventory purchased in 2024 significantly reduced the need for new procurement expenditures during 2025, while transition to smaller battery units lowered overall program costs while maintaining compliance with UL 2743 standards. Additionally, battery distributions outside of active PSPS events were reduced as program delivery responsibilities shifted between the CFILC and Portable Battery Program structures. Importantly, operational performance exceeded planned targets despite the substantial reduction in expenditures.
- Several initiatives demonstrated significant operational implementation and governance activity despite the absence of formal financial variances. EP-01 demonstrated extensive emergency preparedness coordination through completion of four emergency response exercises, associated After-Action Reports, and development of comprehensive Emergency Operations Center (EOC) Incident Action Plans incorporating staffing, communications, resource coordination, weather forecasting, and operational scheduling protocols.

Key Trends and Funding Compliance: Several important trends emerged throughout the funding verification review of emergency preparedness and PSPS-related initiatives.

- Many initiatives focused primarily on governance, preparedness, planning, and operational coordination rather than large-scale infrastructure deployment or direct field implementation activities. As a result, several initiatives did not carry significant standalone budget allocations yet still demonstrated meaningful operational contributions toward wildfire mitigation readiness and PSPS effectiveness.
- Customer resiliency and support programs demonstrated effective operational performance alongside notable cost efficiencies. PS-06 illustrated how existing inventory utilization, procurement strategy changes, and revised battery specifications substantially reduced expenditures while allowing PG&E to exceed customer support targets during PSPS-related operations. Similarly, PS-07 Reduce PSPS Impacts exceeded operational goals by mitigating more than 13,000 customer events through wildfire mitigation projects and system improvements supporting reduced PSPS impacts.

PG&E maintained funding compliance and appropriately aligned expenditures and operational activities with wildfire mitigation, PSPS preparedness, and emergency response objectives. Where financial variances occurred, they were consistently supported through documented operational

efficiencies, inventory management improvements, revised procurement strategies, or implementation adjustments. Across the reviewed initiatives, PG&E consistently met or exceeded operational objectives, and there was limited evidence that financial variances adversely affected emergency preparedness, customer resiliency support, or PSPS operational readiness outcomes.

4.5 COMMUNITY OUTREACH AND ENGAGEMENT

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.5.1 Initiative Summary Table

Table 63: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ³³	Sample Validation Rate (%) ^{34 35}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{36 37}	WMP – Planned Spend (\$) ³⁸	EC-Claimed Actual Spend (\$ and % from budget) ³⁸	Satisfied Risk Reduction Goal? ³⁹
CO-01, 8.5.2, Community Engagement – Meetings	22 Community Engagement Meetings	22 Community Engagement Meetings	Complete	14 Meetings	100%	Community Engagement Meetings List Community Engagement Post-Event Write-Ups (DR016)	100%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	No Goal Provided
CO-02, 8.5.2, Community Engagement – Surveys	2 PSPS Education & Outreach Surveys	2 PSPS Education & Outreach Surveys	Complete	2 Surveys	100%	Pre- and Post-Wildfire Season Surveys (Frontload Data)	100%	Not Reported on Table 4 of the 2025 EC AIR	Not Reported on Table 4 of the 2025 EC AIR	N/A

³³ N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

³⁴ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

³⁵ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

³⁶ The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.

³⁷ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.

³⁸ For entries with “Not Reported on Table 4 of the 2025 EC AIR,” the IE requested more information in DR005. PG&E informed the IE that these initiatives are considered “Provider Cost Center (PCC) Costs” and deal with qualitative initiative work and PG&E does not track specific costs for these initiatives to report on.

³⁹ “No Goal Provided” is listed when the 2023-2025 WMP does not contain any information on % Risk Impact (% Risk Reduction Goal or TBD or N/A). “TBD” and “N/A” are entries that PG&E utilizes for certain initiative’s % Risk Impact and is not an IE determination, but rather a determination made by PG&E.



4.5.2 Written Detail for Initiatives

4.5.2.1 Initiative Review – Findings & Method

CO-01 – 8.5.1 Community Engagement – Meetings – Non-Focus and Non-Field Verifiable

CO-01 outlines PG&E’s commitment to holding community engagement meetings which aim to educate agencies, customers, and property owners on the utility’s wildfire mitigation practices, such as EPSS, community resilience, and system hardening. PG&E did not provide a risk reduction goal for this initiative.

The initiative target for 2025 was 22 total community outreach events. According to PG&E’s 2025 EC AIR, the utility completed 22 community engagement meetings across five service regions. In response to DR016, PG&E provided a list of 22 community outreach events that included format, date of event, location, attendee count, topics covered, and a link to the recording or presentation.

The IE requested 14 samples to validate this initiative, 1 in-person open house, 1 wildfire safety webinar, 4 region specific wildfire safety webinars, and 8 town halls. PG&E provided post-event write-ups detailing the purpose and overview, date, time, and number of attendees, topics discussed, event material, and questions raised during the event for all 22 community meetings. The IE reviewed the post-event write-up for each of the formats requested (detailed above) of community meetings and identified no issues or discrepancies.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 64: Community Engagement 2025 - Meetings

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR016 Response	Initiative Validation Rate
22 Community Engagement Meetings	22 Community Engagement Meetings	N/A	22 Community Engagement Meetings	Initiative Validated

CO-02 – 8.5.2 Community Engagement - Surveys– Non-Focus and Non-Field Verifiable

CO-02 outlines PG&E’s commitment to conduct two PSPS education and outreach surveys. The utility conducts a pre- and post-wildfire season survey of the public to evaluate the effectiveness of the education and outreach efforts prior to, during, and immediately after peak PSPS and wildfire seasons. The initiative focuses on key community groups that include AFN; residential and unassigned Small Medium Business (SMB) customers; property owners and property managers; critical facilities, such as water agencies, communications providers, and hospitals; and CBOs. PG&E did not provide a risk reduction goal for this initiative.

The initiative target for 2025 was to complete two PSPS education and outreach surveys. According to PG&E’s 2025 Q4 QDR, the utility completed two surveys, conducting pre-season

and post-season waves. For the frontload data request, the utility provided the final report of both surveys conducted in 2025. The Post-Season Wave Final Report was published March 11, 2025, and included 2,671 survey (PG&E sent 269,399) findings gathered between November and December 2024. 57% of PG&E customers recalled outreach and 71% recalled outreach who live in HFTD, significantly up from 53% in 2023. The Pre-Season Wave Final Report was published November 20, 2025, and included 2,535 survey (PG&E sent 173,774) findings gathered between August and September 2025. 54% of PG&E customers recalled outreach and 63% recalled outreach who live in HFTD, lower than the pre-season findings in 2024.

The IE identified no issues or discrepancies during this review. Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 65: Community Engagement - Surveys

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
2 PSPS Education & Outreach Surveys	N/A	2 PSPS Education & Outreach Surveys	Pre- & Post-Season Survey	Initiative Validated

4.5.2.2 Funding Verification – Findings

CO-01 – Community Engagement - Meetings

Strategic Overview and Risk Mitigation

This initiative involved PG&E’s commitment to holding community engagement meetings which aim to educate agencies, customers, and property owners on the utility’s wildfire mitigation practices, such as EPSS, community resilience, and system hardening. PG&E set a target for 2025 was 22 total community outreach events. PG&E did not provide a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met the stated target, completing 22 community engagement meetings across five service regions, furthering its wildfire mitigation engagement efforts across the PG&E service territory.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

CO-02 – Community Engagement - Surveys

Strategic Overview and Risk Mitigation

This initiative involves PG&E’s commitment to conduct two PSPS education and outreach surveys. The initiative focuses on key community groups that include AFN; residential and unassigned Small Medium Business (SMB) customers; property owners and property managers; critical facilities, such as water agencies, communications providers, and hospitals; and CBOs. PG&E did not provide a risk reduction goal for this initiative.

Financial Performance Analysis

This initiative was not explicitly identified in the PG&E EC AIR and, therefore, did not include separate planned or actual expenditure data. Although the initiative appeared in the 2025 EOY report, the associated financial information was grouped with other initiatives rather than reported individually. Through data request DR005, PG&E was asked to provide the planned and actual expenditures specific to this initiative. In response, PG&E explained that, from a financial reporting perspective, the activities associated with this initiative are categorized as “PCC Costs” (Provider Cost Center costs). PG&E further stated that it does not separately track costs for this initiative; however, PG&E noted that the Method of Verification described within the WMP narrative can be used to confirm that the work associated with this initiative was completed.

Operational Impact and Risk Reduction

PG&E met the stated target, completing two PSPS education and outreach surveys, furthering its wildfire mitigation engagement efforts across the PG&E service territory.

Assessment and Conclusion

PG&E effectively completed this initiative, meeting operational targets.

4.5.3 Synthesis of Findings

4.5.3.1 Initiative Review

Both community outreach initiatives met their 2025 WMP targets, representing 100% target achievement across the category. CO-01 (Community Engagement Meetings) completed exactly 22 meetings as targeted across five service regions with formats including in-person open houses, wildfire safety webinars, region-specific webinars, and town halls, while CO-02 (Community Engagement Surveys) completed two PSPS education and outreach surveys (pre-season and post-season waves) as targeted.

Documentation quality was strong, with CO-01 providing post-event write-ups for all 22 meetings detailing purpose, date, attendee counts, topics discussed, event materials, and questions raised, alongside links to recordings or presentations. CO-02 provided survey reports with statistically significant sample sizes (2,671 post-season respondents from 269,399 sent representing 1.0% response rate; 2,535 pre-season respondents from 173,774 sent representing 1.5% response rate) and analysis by customer type (AFN, residential, SMB, property owners/managers, critical facilities, CBOs) and geography (HFTD vs. non-HFTD).

Both initiatives emphasized customer awareness and stakeholder coordination intended to improve public understanding of wildfire mitigation activities and reduce customer impacts during PSPS events. These outreach efforts support broader operational objectives by improving customer preparedness, facilitating community coordination, and enhancing public understanding of wildfire mitigation strategies implemented across PG&E's service territory.

4.5.3.2 Funding Verification

Budget and Expenditure Summary: The Community Outreach and Engagement category had a total planned budget of \$0.00 with actual expenditures of \$0.00, reflecting activities funded through operational budgets rather than specific WMP allocations.

Initiatives with Significant Variances: Of the 2 total initiatives in this category, zero (0%) had absolute percent differences exceeding 10%. All initiatives operated through integration with standard operational functions, enabling community engagement activities without requiring dedicated WMP funding allocations.

Key Trends and Funding Compliance: PG&E maintained funding compliance and effectively completed the operational objectives associated with community engagement and customer outreach efforts. The reviewed initiatives demonstrated continued emphasis on public communication, customer preparedness, and stakeholder coordination while maintaining alignment with broader wildfire mitigation and PSPS support objectives. There was no indication that funding limitations or operational challenges adversely affected implementation of the planned outreach and engagement activities.

5. EVALUATION OF QA/QC PROGRAMS

Quality Assurance and Quality Control (QA/QC) are essential in ensuring the thoroughness and reliability of an EC's operations. This section presents a comprehensive assessment of PG&E's QA/QC program, utilizing a structured approach based on five key dimensions:

- Roles and Responsibilities
- Quality Culture
- Quality Management System (QMS)
- Quality Inspections and Audits
- QA/QC Technology Adoption

By examining these critical areas, the IE aims to provide a holistic view of the EC's quality practices, highlighting areas of strength, identifying industry-leading best practices, and pinpointing opportunities for enhancement. Each category was scored on a scale ranging from 0-4 and the score demonstrated the EC's maturity in QA/QC implementation: 0 – Not Implemented; 1 – Initiated; 2 – Applied; 3 – Routine; 4 – Mastered. The evaluation framework allows a thorough analysis of how quality is integrated into the EC's structure, culture, systems, and processes.

Roles and Responsibilities – 3 Routine

PG&E's Roles & Responsibilities dimension achieves Level 3 - Routine maturity level. PG&E demonstrates integrated organizational structure through its three-tier QA/QC framework that operates cohesively rather than in isolation. The Embedded QA/QC at the program level, Wildfire Mitigation PMO QA for initiative monitoring, and Electric Quality Management for asset inspection programs create accountability layers with clear handoff points and escalation pathways. This integration is evidenced by the multi-layer review structure where "PMO validation and Responsible Director (RD) approval" provide "end-to-end traceability from execution through compliance reporting," demonstrating that roles are not just defined but coordinated across organizational boundaries. PG&E explicitly describes "WM PMO-led cross-functional workflows" that facilitate communication across departments, indicating effective and regular QA/QC communication across the utility.

Cross-functional coordination mechanisms are designed into the organizational structure. QA/QC duties are communicated through "formal procedures, defined functional roles, and WM PMO-led cross-functional workflows," indicating utility integration rather than siloed operations. Accountability is tracked through "centralized monitoring, documentation, and audit processes" with "multi-layer reviews, including PMO validation and Responsible Director approval, with end-to-end traceability from execution through compliance reporting." This centralized tracking with multiple validation layers demonstrates coordination across the three-tier structure. PG&E confirms that communication occurs through "governance forums" and "feedback loops" that enable "visibility across field teams, contractors, and leadership," indicating structured platforms that provide real-time cross-tier coordination rather than ad hoc information sharing.

Executive-level governance and strategic integration are evidenced through multiple independent oversight mechanisms that demonstrate leadership commitment. Compliance and Operational

Assurance (COA) function independently and validates that commitments are well defined, properly executed, and supported by adequate evidence and performs program maturity assessments identifying additional actions to support repeatable outcomes. Internal Auditing (IA) validates WMP commitments quarterly, reviewing applicable commitments, unit completion definitions, and evidence requirements, meeting with PMO staff and SMEs, and documenting conclusions in formal audit and validation reports. The workflow explicitly includes Responsible Director approval as the final checkpoint, ensuring traceability and compliance prior to reporting, demonstrating executive-level accountability embedded in operational processes.

Regular review and optimization processes are embedded throughout the quality management structure. QA/QC processes are standardized through formal procedures and embedded program requirements and are regularly reviewed and updated based on audit results, lessons learned, regulatory changes, and continuous improvement expectations outlined in WMP updates. This demonstrates that role effectiveness and process optimization are not ad hoc activities but systematic, recurring practices tied to multiple feedback mechanisms. The Asset Programs specifically demonstrate continuous improvement through the overhead Job Aid TD-2305M-JA02, which is updated with a cross functional team of stakeholders, including the quality teams, on a regular basis (normally annually), considering feedback from multiple stakeholders including Quality Control audit findings and Quality Work Verifications to continually improve the guidance.

Quality Culture – 3 Routine

PG&E's Quality Culture dimension achieves Level 3 - Routine maturity level. PG&E demonstrates integrated quality culture through systematic engagement mechanisms that create ongoing dialogue between quality functions and operational teams. The Vegetation Management programs exemplify this integration through their Quality Learning Forums, where VMQC leadership schedules weekly Quality Learning Forums with the VM Operations team to review, track, and find resolutions to VM Quality activities. This weekly cadence represents more than periodic compliance review, it establishes quality as a continuous operational priority where issues are collaboratively resolved in near real-time.

VMQC field audits are reviewed by VMQC Supervisors monthly for experienced Quality Management Auditors and weekly for newer QMAs, while VMQC Contract staff are reviewed by the QC contract Supervisor and checked quarterly by the internal QC Supervisor. VMQA field audits are reviewed by VMQA Supervisors on a quarterly basis. This multi-tiered internal review structure demonstrates that quality expectations are reinforced continuously through coaching and calibration rather than waiting for external audits or failures to drive improvement.

The overhead Job Aid TD-2305M-JA02 is updated with a cross functional team of stakeholders, including the quality teams, on a regular basis (normally annually), considering feedback from multiple stakeholders including Quality Control audit findings and Quality Work Verifications to find continuous improvement. This annual cross-functional review ensures that quality insights directly shape the training materials and field guidance that define day-to-day work execution.

PG&E incorporates quality findings into job aids that serve as the basis for training and guiding field employees in identifying abnormal conditions for both Aerial and Ground WMP Inspections.

Quality culture extends beyond internal processes to encompass contractor oversight and performance management. Contractor and third-party expectations are reinforced through oversight requirements and performance reviews to ensure consistent application of QA/QC standards. This demonstrates that quality culture is not limited to internal employees but extends to PG&E's subcontractors executing wildfire mitigation work. The VMQA/VMQC programs specifically demonstrate this integration by having all audits performed by both Internal PG&E personnel and PG&E Contractors, with contract staff subject to the same rigorous review structures as internal personnel.

Quality Management Systems (QMS) – 3 Routine

PG&E's Quality Management Systems (QMS) dimension achieves Level 3 - Routine maturity level. PG&E maintains documented QMS structures that define roles, controls, and oversight mechanisms supporting WMP implementation, compliance, and continuous improvement. The documented QA/QC procedures and quality management processes provide formal protocols that extend across multiple program areas.

PG&E's QA/QC workflow includes activity execution, embedded QA/QC validation, cross-functional review involving PMO, Regulatory, and Legal functions, and Responsible Director approval as the final checkpoint, ensuring traceability and compliance prior to reporting. The Compliance and Operational Assurance function independently validates that commitments are well defined, properly executed, and supported by adequate evidence, including supporting resolution of any corrective actions identified, while also performing program maturity assessments identifying additional actions to support repeatable outcomes. IA reviews the applicable WMP commitment, unit completion definitions, and defined record of evidence requirements, verifying alignment with defined requirements and stated targets and meeting with the Wildfire Mitigation PMO organization and relevant subject matter experts as needed. IA also meets with PMO staff to address any concerns noted during the validation, with scope, procedures performed, and conclusions documented in formal audit and validation report materials.

Process standardization is maintained and continuously improved through formal review mechanisms. QA/QC processes are standardized through formal procedures and embedded program requirements and are regularly reviewed and updated based on audit results, lessons learned, regulatory changes, and continuous improvement expectations outlined in WMP updates.

Data management capabilities demonstrate enterprise-level sophistication through integrated platforms that provide centralized visibility and analytical capabilities. The Enterprise Data Management Platform (Colibra, Ataccama, Foundry) holds the Critical Dataset Registry, identifies Critical datasets, dataset owners, business data stewards, their identified critical data elements and corresponding metadata, applies data quality rules to CDEs to determine rules-based data quality conformance, and hosts a dashboard for assessing results and determining cause of rule failures. This integrated platform approach creates data governance that extends beyond individual programs to enterprise-wide data quality management.

The Asset Inventory and Condition Database (Foundry) serves as PG&E's primary platform for integrating asset inventory, inspection, and condition data across systems of record, including Electric T&D GIS and SAP. By combining asset, inspection, and remote-sensing data (e.g., aerial imagery), Foundry enables deeper analytics into inspection coverage, asset condition, and wildfire mitigation strategies, supporting more targeted, risk-based investment decisions. This integration eliminates data silos that historically fragmented quality visibility, enabling cross-functional teams to access consistent information and make coordinated decisions based on shared understanding of asset conditions and quality performance.

The Wildfire Intelligence Reporting Engine (WiRE) Data Hub provides centralized, automated, and standardized reporting for Wildfire Mitigation Plan initiatives, establishing a single record of evidence and improving QA/QC by enforcing internal consistency across spatial and tabular datasets. WiRE was launched in Q1 2026 and has improved internal consistency across spatial and tabular quarterly wildfire mitigation reports by over 40%, demonstrating measurable quality improvement through systematic data management. The automation reduces manual reconciliation efforts while improving accuracy, and the single record of evidence creates definitive source material for regulatory reporting that eliminates ambiguity about which data represents official results.

Quality Inspections and Audits – 3 Routine

PG&E's Inspections and Audits dimension achieves Level 3 - Routine maturity level. PG&E maintains multi-layered audit programs that provide quality oversight across both asset management and vegetation management. The Electric Quality Management (EQS) organization operates System Inspection Quality Control (GM-09)(SIQC) and System Inspection Quality Assurance (GM-01)(SIQA) as independent audit programs conducted both at the desktop and in the field. In 2025, SIQC audits were performed by a combination of internal Quality Control Specialists and contract partners, while SIQA audits were performed by contract partners. The Vegetation Management programs operate parallel VMQA and VMQC structures, with VMQA having two distinct programs, QA-Performance tied to WMP commitment VM-08 that assesses completed VMQC audits to measure whether the VMQC program was conducting work as intended under VM-22, and VMQA-Asset that performs audits on randomly sampled sections of overhead line and subject poles to measure compliance with applicable regulations, Public Resource codes, and conformance with internal VM procedures.

VMQC Distribution scope samples include work order packets with all spans 100% VMI complete, within the current project year, and in HFTD Tier 2 and 3 areas. VMQC Transmission scope samples include VMI work completed Source Side Device Route locations, within the current project year, from the current project plan and in HFTD Tier 2 and 3. VMQC Vegetation Control Pole Clearing samples include VC subject poles (compliance and risk poles) that are completely cleared in HFTD Tiers 2 and 3/HFRA, within the current project year, plus a sampling of non-subject poles inspected by VC in HFTD Tiers 2 and 3/HFRA. The VMQA-Asset program performs audits on randomly sampled sections independent of completed VM work activity, with spans sampled randomly and representative of HFRA/HFTD mileage by area, creating an independent validation layer that is not influenced by recent work activity patterns.

SIQC and SIQA reviews are conducted on a calendar-year basis for inspections completed in that same implementation year, with audits performed continuously throughout the year as inspections are completed. Sampling and review occur on a rolling basis rather than at a single annual point-in-time. For implementation year 2025, SIQC/SIQA audit activities were executed throughout the year and concluded with a year-end closeout in late November once annual targets were met. This continuous execution model provides timely feedback to operational teams while work is still fresh and enables mid-year course corrections rather than discovering issues only after annual cycles are complete. The VMQC programs follow similar patterns, with VMQC generally sampling spans beginning 3 weeks from the VMI date, and when sampling post tree work spans, the timeframe could be several months after the routine VMI date, creating timely validation while allowing sufficient time for work completion.

In 2025, SIQC and SIQA documented findings through internal dashboards and PDF reports, with findings resulting in the creation of an SAP notification or "tag" entered into the system for evaluation and resolution through the work management process. Activities related to SIQC were also documented within PG&E's corrective action program on a quarterly basis, creating formal accountability mechanisms with executive visibility. Findings from VMQA/VMQC inspections are captured in Survey123 and reported out to VM Operations weekly, with VMQA/VMQC standing up a finding mitigation process that involves a response from VM Operations. VMQA-Asset findings are tracked on a shared Excel Mitigation datasheet used to document findings and allow VM operations to report their mitigation and closure efforts, with the mitigation datasheet uploaded into the PG&E CAP system and a CAP assigned to VM Operation for completion.

VMQC leadership schedules weekly Quality Learning Forums with the VM Operations team to review, track, and find resolutions to VM Quality activities, creating regular touchpoints where audit insights directly inform operational adjustments. For Asset Programs, the overhead Job Aid TD-2305M-JA02 is updated with a cross functional team of stakeholders, including the quality teams, on a regular basis (normally annually), serving as the basis for training and guiding field employees in identifying abnormal conditions for both Aerial and Ground WMP Inspections. During the updates for revision 15, the team considered feedback from multiple stakeholders including Quality Control audit findings and Quality Work Verifications to continually improve the guidance for WMP and other types of inspections. Additionally, in 2025, SIQC and SIQA audit findings were reviewed and evaluated by system inspections execution and asset strategy when updating the overhead job aids, the primary governance documents for inspections activities.

QA/QC Technology Adoption – 3 Routine

PG&E's Technology Adoption dimension achieves Level 3 - Routine maturity level. PG&E has deployed enterprise data management platforms that create integrated quality oversight capabilities across organizational boundaries. The Enterprise Data Management Platform integrating Collibra, Ataccama, and Foundry holds the Critical Dataset Registry, identifies Critical datasets, dataset owners, business data stewards, their identified critical data elements and corresponding metadata, applies data quality rules to CDEs to determine rules-based data quality conformance, and hosts a dashboard for assessing results and determining cause of rule failures. This integrated platform approach demonstrates sophisticated data governance that extends

beyond individual programs to enterprise-wide data quality management, with automated rule application enabling proactive identification of data issues and dashboards providing transparency for rapid issue resolution.

The Asset Inventory and Condition Database built on Foundry serves as PG&E's primary platform for integrating asset inventory, inspection, and condition data across systems of record, including Electric T&D GIS and SAP, creating a consistent, asset-centric view to support QA/QC activities. By combining asset, inspection, and remote-sensing data including aerial imagery, Foundry enables deeper analytics into inspection coverage, asset condition, and wildfire mitigation strategies, supporting more targeted, risk-based investment decisions. This integration eliminates data silos that historically fragmented quality visibility, enabling cross-functional teams to access consistent information and make coordinated decisions based on shared understanding of asset conditions and quality performance.

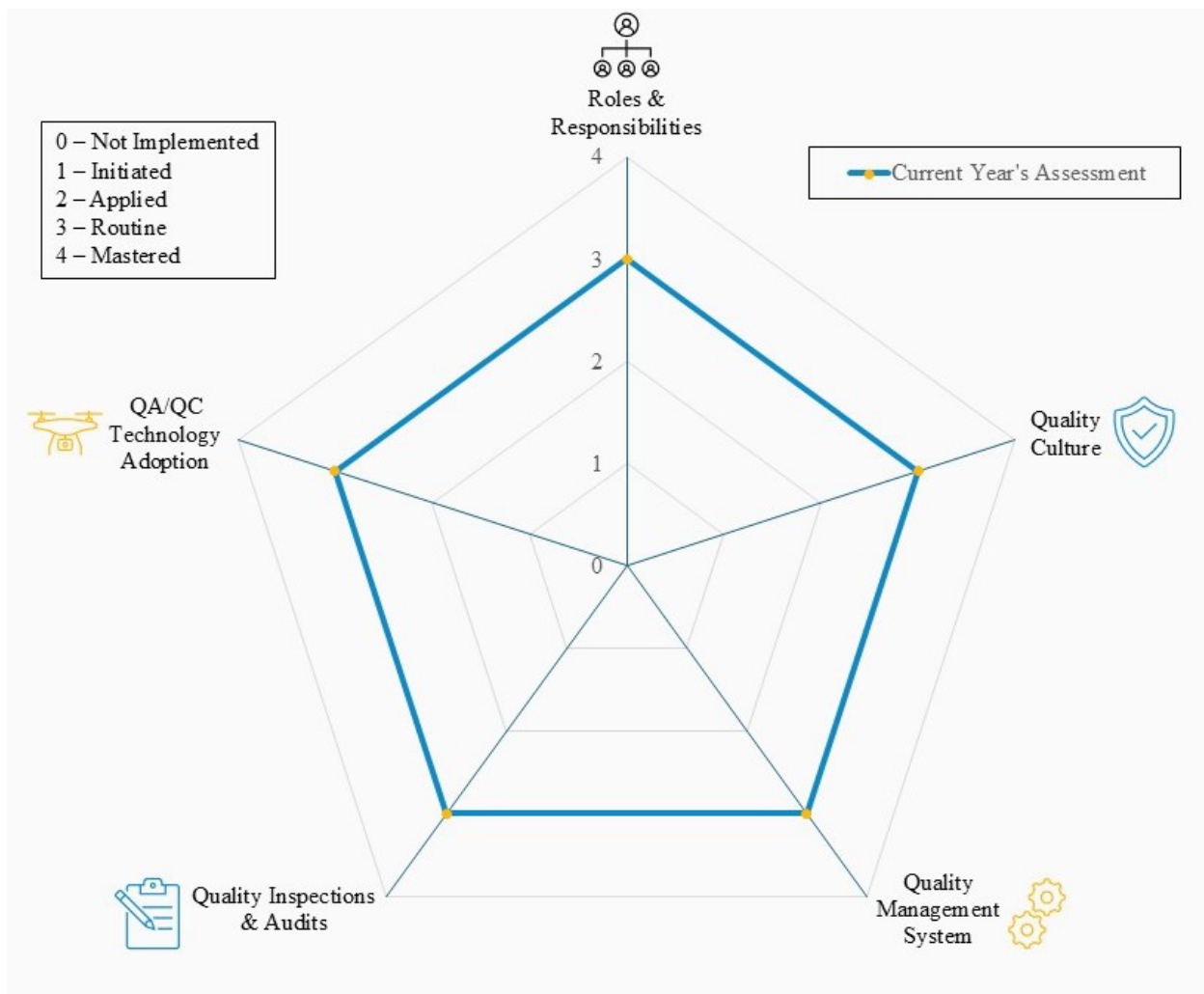
The Wildfire Intelligence Reporting Engine (WiRE) Data Hub represents significant technology advancement launched in Q1 2026 as a centralized, automated reporting platform for wildfire mitigation data. Prior to WiRE, WMP reporting relied on distributed data sources, resulting in challenges aligning spatial and tabular data results and increased efforts to QA/QC the data. PG&E claims that WiRE has improved internal consistency across spatial and tabular quarterly wildfire mitigation reports by over 40%. The establishment of a single record of evidence through WiRE creates definitive source material for regulatory reporting that eliminates ambiguity about which data represents official results, strengthening regulatory compliance and audit readiness.

Electric Quality Management employs an integrated set of enterprise tools that create end-to-end technology support for the audit lifecycle. ArcGIS Survey123 serves as the standardized audit and data collection tool for desktop and field-based QA/QC audit reviews, enforcing required fields, structured findings, and consistent data capture and supporting generation of audit PDFs at case finalization. The tool's enforcement of required fields and structured findings prevents incomplete or inconsistent audit documentation, while the automated PDF generation creates standardized audit artifacts that support traceability and regulatory transparency. ArcGIS Audit & Dispatcher Tools manage audit assignment, workload dispatch, and review status across the QA/QC workforce, providing real-time visibility into audit progress and enabling workload balancing to ensure coverage targets are met. Enterprise Databases including Foundry and SQL repositories serve as the system of record for audit responses, sampling populations, data quality discrepancies, and historical QA/QC results, feeding downstream reporting and discrepancy detection. Power BI Dashboards monitor QA/QC performance, pass/fail rates, sampling volumes, re-inspections, and trends over time, providing executive visibility and enabling data-driven decision making about quality performance.

Vegetation Management programs demonstrate field technology deployment that enables quality oversight. The programs utilize Field Maps App and Survey123 App for mobile data collection, Power BI Dashboards for performance monitoring, Excel Technical Implementation Planning sheets and quality work tracking sheets for planning and coordination, and specialized field tools including rangefinders, DBH tape, binoculars, mallets, and calibrated non-conductive tools to measure Vegetation Control Pole Clearing cylinder scope of work. iPhones and iPads with GPS

capabilities enable precise location documentation, while satellite radios ensure communication in areas with no cell service.

Figure 13: QA/QC Maturity Sunburst Chart



6. CONCLUSION

This IE report presents an assessment of Pacific Gas and Electric's 2025 Wildfire Mitigation Plan initiative performance across the five wildfire mitigation categories. The evaluation encompassed 55 initiatives spanning Grid Design, Operations, and Maintenance; Vegetation Management and Inspections; Situational Awareness and Forecasting; Emergency Preparedness; and Community Outreach and Engagement. Through document review, data analysis, field verification, and sampling validation, the IE assessed PG&E's execution against established 2025 targets.

PG&E successfully met or exceeded the target for 54 of the 55 initiatives evaluated for implementation year 2025. In Grid Design, Operations, and Maintenance, PG&E completed 539.04 circuit miles of distribution hardening (104% of target), 333.82 circuit miles of undergrounding work (101% of target), and 19.80 circuit miles of transmission system hardening (396% of target). Field verification activities confirmed construction quality, workmanship standards, and alignment between documented and observed field conditions across sampled initiatives. The utility's inspection programs across transmission and distribution systems demonstrated consistent execution and documentation quality, with distribution ground inspections completing 279,939 poles against a 244,000-pole target and substation supplemental inspections meeting all established targets, subject to the documentation-quality gaps identified in section 4.1.2.1 and the related IE recommendations.

Within Vegetation Management and Inspections, PG&E demonstrated successful execution across 16 initiatives, consistently exceeding inspection and mitigation targets while maintaining exceptionally high-quality assurance and quality control pass rates. The utility collected LiDAR data for 17,954 circuit miles (102% of target) and mitigated 31,311 trees from the legacy Enhanced Vegetation Management program (125% of target). Routine and second patrol inspections covered 78,438 span miles and 25,704 span miles respectively, exceeding established targets. Quality assurance and quality control programs demonstrated pass rates ranging from 99.24% to 100% across distribution routine VM, transmission routine VM, and vegetation control pole clearing programs, substantially exceeding the 95% target pass rate. Although PG&E demonstrated strong vegetation management implementation, the utility counted "constrained" and "no work" poles toward pole clearance target completion for VM-02. The IE was only able to validate pole clearing on 60,396 poles resulting in a 75% initiative validation rate. PG&E should revise pole clearing completion counting methodology and reporting practices to separate "work completed" from "assessed and no work required," enhancing transparency on actual risk mitigation activities versus locations where assessment determined clearing was unnecessary.

PG&E achieved all six initiatives within Situational Awareness and Forecasting, demonstrating continued investment in grid monitoring technologies and wildfire risk modeling enhancements. The utility installed line sensors on 45 circuits (113% of target), Distribution Fault Anticipation devices on 17 circuits (113% of target), and Early Fault Detection devices on 4 circuits (100% of target). PG&E evaluated enhancements to Fire Potential Index and Ignition Probability Weather models, with Version 5.0 models deployed in August 2024 and presented to the Wildfire Risk Governance Steering Committee. The utility monitored and evaluated HD camera AI automated

fire detection performance throughout 2025 in partnership with Digital Path, receiving all vendor reports by November 26, 2025. A feasibility study on using EFD and DFA technologies to identify incipient failures as a supplement to field inspections was completed, with recommendations including expanding EFD deployment, backfilling previously deployed circuits with EFD tap units, and enhancing sensor accuracy through APIs and machine learning.

Within Emergency Preparedness, PG&E achieved all nine initiatives, demonstrating comprehensive emergency planning, PSPS program enhancements, and customer support capabilities. The utility completed four emergency preparedness exercises in 2025, maintained its All-Hazards Planning and Preparedness Program through General Order 166 compliance reporting, and expanded all-hazard planning by adding two new annexes to the Company Emergency Response Plan for Capacity Shortage events and Volcano events. PG&E updated the CERP, PSPS Annex, and Wildfire Annex in 2025, and evaluated enhancements for both PSPS Transmission and Distribution guidance, with updated models and guidance presented to the WRGSC. The utility provided 3,798 portable batteries to AFN customers (115% of target) and mitigated 13,327 customer events through undergrounding efforts (102% of target). Monthly Joint Utility Public Safety Power Shutoff Working Group meetings were held with California IOUs throughout 2025, with each joint working group report submitted to the CPUC.

PG&E achieved both initiatives within Community Outreach and Engagement, demonstrating commitment to customer education and feedback collection. The utility completed 22 community engagement meetings across five service regions, including in-person open houses, wildfire safety webinars, region-specific wildfire safety webinars, and town halls. Two PSPS education and outreach surveys were completed in 2025: a post-season wave showing 57% of PG&E customers recalling outreach (71% of HFTD customers), significantly up from 53% in 2023, and a pre-season wave showing 54% of PG&E customers recalling outreach (63% of HFTD customers).

PG&E's initiative execution, supported by documentation and field verification, demonstrates continued commitment to wildfire risk reduction. PG&E's over-performance in key initiatives, including transmission system hardening (396% of target), tree removal (125% of target), and portable battery distribution (115% of target), reflects proactive resource allocation and operational effectiveness. High-quality assurance and quality control pass rates (99.24% to 100%) across asset inspection and vegetation management programs further validate program maturity and execution consistency. The utility's continued investment in grid hardening, vegetation management, situational awareness technologies, emergency preparedness, and community engagement positions PG&E to further reduce wildfire risks and enhance public safety in its service territory.

7. ATTACHMENTS

- 7.1 CATALOG OF INITIATIVES**
- 7.2 DATA REQUESTS**
- 7.3 SME INTERVIEWS**
- 7.4 PICTURES OF NON-CONFORMANCE**