

September 4, 2026

Via Electronic Mail

Patrick Doherty, Program Manager
Office of Energy Infrastructure Safety
Performance Assurance Division
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Re: PG&E Comments on Final Independent Evaluator Annual Implementation Report (IE AIR)
for PG&E's 2025 Wildfire Mitigation Plan

Dear Mr. Doherty:

Pacific Gas and Electric Company (PG&E) appreciate the efforts of Bureau Veritas North America, Inc. (BVNA or the Independent Evaluator) in developing the Final Independent Evaluator Annual Implementation Report (IE AIR) for PG&E's 2025 Wildfire Mitigation Plan and respectfully submits the following comments.

1. Executive Summary

PG&E appreciates the significant effort that BVNA put into preparing this report and assessing the work performed as part of our 2025 Wildfire Mitigation Plan (WMP). We appreciate the third-party review of our implementation as it plays a key role in identifying areas of success and opportunities for improvement.

The findings in the IE AIR demonstrated our continued progress in the performance of our wildfire mitigation work. We are proud of BVNA's conclusion that, "PG&E's initiative execution, supported by documentation and field verification, demonstrates continued commitment to wildfire risk reduction."¹ We embrace our purpose of delivering for our hometowns, serving our planet, and leading with love as we work to earn the trust of all who rely on us. This includes our commitment to building a clean, safe, and resilient energy system that meets the climate challenges we face.

¹IE AIR (July 1, 2026) at 146.

After conducting a detailed review of our 2025 WMP activities, BVNA found that we met our targeted goals for 54 of the 55 initiatives evaluated in the WMP. This included numerous areas where we exceeded our 2025 goals such as:²

Program	Section	PG&E Target	PG&E Actual	Target Achievement
System Hardening - Distribution	8.1.2.1 (GH-01)	520 circuit miles of work	539.04 circuit miles of work	+104%
System Hardening - Transmission	8.1.2.5.1 (GH-05)	5 circuit miles of work	19.80 circuit miles of work	+396%
Portable Battery Distribution	8.1.2.10.1 (PS-06)	3,300 units made capable	3,798 units made capable	+115%
Line Sensor Installations	8.3.3.1 (SA-02)	40 circuit installed sensors	45 circuit installed sensors	+113%
Tree Removal	8.2.2.2.4 (VM-04)	25,000 trees mitigated	31,311 trees mitigated	+125%

The IE AIR was able to provide validation for all initiatives but one for the 2025 WMP. BVNA also identified areas of opportunity for a few initiatives. We view these findings as areas for continued improvement. In Section 2 of this response, PG&E provides an explanation on BVNA's challenges to validate 2025 WMP Pole Clearing targets. Section 3 explains the actions we are taking to respond to each identified area of opportunity. Finally, in Section 4 of this response, we discuss additional information relating to the funding of our 2025 WMP highlighted in the IE AIR.

2. Non-Validated 2025 WMP Initiatives

The non-validated initiative below was identified in the IE AIR due to BVNA not being able to confirm the completion counting methodology for 2025 WMP targets.

a. Pole Clearing Program (VM-02) – 8.2.3.1

BVNA stated the following:

“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

² *Id.* at 12.

vegetation clearing or tree work, while 20,733 poles (5,961 constrained + 14,772 no work) were counted as complete without physical clearing occurring.”³

Response:

PG&E maintains that the 2025 WMP Year VM-02 Pole Clearing Program achieved its intended objectives in 2025 and met the commitments established with stakeholders and regulators.

The program evaluates all applicable locations annually. Locations identified as “No Work” or “Constrained” were assessed in accordance with program requirements and documented based on the conditions present at the time of evaluation.

To support continued program improvement, we are providing additional clarity around key program definitions and implementing process enhancements for 2026.

- i. A location is classified as “No Work and has been assessed” and “no work required” without physical clearing occurring when:
 - The site has been evaluated and does not require additional intervention based on applicable procedures and compliance requirements.
 - The site qualifies for a CCR Title 14 §1255 exemption.
- ii. These locations have been evaluated and incorporated into the program's annual assessment process, even when no additional field work was required.
- iii. A location is classified as “Constrained” when external factors prevent work from being completed at the time of evaluation. These locations are assessed annually and remain active within the program. The program works continuously to resolve constraints and advance work whenever feasible.

As part of our commitment to continuous improvement, we reviewed lessons learned from the 2025 project year and identified opportunities to further enhance transparency, consistency, and clarity in program reporting, classification methodologies, and constraint management processes. The enhancements being implemented for 2026 will build upon that foundation by providing greater clarity, strengthening processes, and improving visibility into program execution and outcomes.

Additional 2026 focus areas:

- i. *Planned Process Improvements*

Standards and Procedure Updates:

- Optimize and incorporate lessons learned from the 2025 project year

³ *Id.* at 9.

ii. *Enhanced Constraints Management*

Drawing on key elements of the Distribution Routine process, the program is implementing:

- Proactive land rights validation and acquisition
- Improved customer engagement, coordination, and outreach
- Enhanced tracking and monitoring capabilities of constrained locations
- Clear escalation pathways for equipment change requests when access limitations cannot be resolved

iii. *Systems Enhancements*

To strengthen records management and program visibility:

- Transitioning to an improved work management system, providing direct linkage between program records and SAP assets
- Enhance current systems to improve visibility into constraints, workflow status, and resolution efforts

These improvements reflect PG&E's ongoing commitment to transparency, accountability, and continuous improvement. By enhancing program definitions, strengthening constraints management, and improving system capabilities and reporting, the program will provide stakeholders and regulators with a clearer understanding of evaluation results, work execution, and overall program performance while ensuring consistent application of program requirements going forward.

3. Opportunities or Issues Raised in the IE AIR

The issues and opportunities below were identified in the IE AIR but were determined by BVNA not to rise to the level of non-compliance with our 2025 WMP. Despite these not being compliance issues, we address these issues below because they represent areas for continuous improvement.

a. Distribution Substation Supplemental Inspections (AI-08) – 8.1.3.3.1; Transmission Substation Supplemental Inspections (AI-09) – 8.1.3.3.1; Hydroelectric Substation & Powerhouses Supplemental Inspections (AI-10) – 8.1.3.3.1

- i. *BVNA stated the following: “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.”⁴*

Response:

⁴ *Id.* at 9.

“N/A” is a standard response to all IR inspections as this references equipment that is not in station or that is non-applicable to inspect. This is a prepopulated form that one would check either "G" for good, no issues found; "I" for issues found; or "N/A" Not Applicable. This is on the inspection sheet that is a PG&E standardized document (TD-3322M-F80). Based on the referenced technical document, PG&E disagrees with this observation.

- ii. *BVNA stated the following: “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.”⁵*

Response:

All aerial imagery collected during these inspections are georeferenced, retained within the inspection platform (Atomic Maps), and used to develop a 3-D photogrammetric model of each substation. The inspection checklist is not intended to contain the complete set of imagery collected for the site, and no applicable inspection protocol requires a photograph of the substation gate to be placed within the checklist.

Accordingly, the presence of a line diagram or as-built drawing within the form does not represent the substitution or omission of required visual evidence. The underlying georeferenced imagery remains available within the inspection platform and provides comprehensive visual documentation of site conditions.

PG&E recognizes an opportunity to provide BVNA with a demonstration of the inspection platform and its relationship to the checklist, georeferenced imagery, and 3D model. This would provide additional context regarding how inspection evidence is captured, retained, and reviewed. However, based on the applicable requirements and the availability of the underlying imagery, PG&E disagrees with this observation.

- b. **“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.”⁶**

Response:

The issue raised is in reference to ‘NOV_ESD_PGE_RGA_20250717_0951’ that PG&E received from Energy Safety’s Environmental Science Division (ESD) on August 7, 2025. PG&E submitted its completed response via E-Filing to Energy Safety’s docket number ‘2025 NOV’ (Electrical: Compliance Enforcement) on Monday, September 8, 2025, at 4:51 PM PST. Additionally, PG&E resubmitted the original

⁵ *Id.* at 9.

⁶ *Id.* at 74.

‘NOV_ESD_PGE_RGA_20250717_0951’ response to Energy Safety’s docket on July 9, 2026.

PG&E appreciates the discussions involving Energy Safety E-Filing submissions expectations and looks forward to future alignment.

4. WMP Funding

The IE AIR concluded that PG&E had an overall financial variance of less than 10% in meeting its target goals.

a. Grid Design, Operations & Maintenance

PG&E maintained a threshold variance of +.44% against its planned budget in the aims in meeting its goals. Comparatively, the IE identified “16 of 24 Grid Design, Operations, and Maintenance initiatives had absolute percent differences exceeding 10%.”⁷ PG&E’s <1% actual to planned budget variance was based on expanded work scope for overruns in alignment with evolving operational priorities. There were also identified underruns that were attributed to process improvements and program efficiencies, and the transition from external contractors to qualified internal crews.

PG&E appreciates the IE’s acknowledgment of our attention to impacted wildfire mitigation effectiveness, regardless of budget variances.

b. Vegetation Management & Inspections

BVNA concluded that “PG&E maintained funding compliance and continued to align expenditures with wildfire mitigation objectives despite substantial financial variances.”⁸ Comparatively, they identified “12 of 17 VM initiatives had absolute percent differences exceeding 10%.”⁹ Although PG&E exceeded planned budgets for the identified initiatives, it was determined that the variances were attributed to process improvements, reallocation of resources and funding, and enhanced inspection methods and practices. Ultimately, PG&E concentrated on spending where the risk reduction was the highest.

c. Situational Awareness and Forecasting

BVNA concluded that “PG&E maintained funding compliance and appropriately aligned expenditures with wildfire mitigation and situational awareness objectives.”¹⁰ Although it was identified that PG&E had absolute percent differences exceeding 10% for 4 of 6 Situational Awareness and Forecasting initiatives,¹¹ the total category had 4.67%

⁷ *Id.* at 67.

⁸ *Id.* at 101.

⁹ *Id.* at 100.

¹⁰ *Id.* at 114.

¹¹ *Id.* at 113.

variance under budget. This was primarily attributed to accounting adjustments and forecasting methodology refinements.

d. Emergency Preparedness

BVNA concluded that “PG&E maintained funding compliance and appropriately aligned expenditures and operational activities with wildfire mitigation, PSPS preparedness, and emergency response objective.”¹² PG&E had a 61% underrun that was attributed to cost efficiency of battery procurement and the reduction of batteries needed outside of active PSPS events.

e. Community Outreach & Engagement

No planned budget or expenditure was reflected in the activities for this category.

f. Process Improvements

PG&E is currently focusing on the following process improvements related to the WMP Funding Process, Accounting, and Reporting:

- i. Enhance Systems for Data Cross-Referencing: Investigate technical solutions or system enhancements that allow tagging or cross-referencing of MAT codes, Major Work Categories, and Orders to specific WMP Activities and Commitments, facilitating more accurate data aggregation and reporting.
- ii. Create an initial map of orders, planning orders, or, if necessary, specific PCCs or purchase orders, to WMP commitments. Establish a process for maintaining this, assigning clear roles and responsibilities.
- iii. Update the WMP Commitment Standard (**EMER-4104S**) to include financial tracking responsibility.
- iv. Require GRC forecasters to provide 2027 GRC forecast data in a form that aligns with WMP commitments. This may be either a forecast for work by HFTD tier, or, if the data is available, a forecast for the specific commitment itself.
- v. Implement a Review Workflow for Accuracy and Consistency: Set up a standardized review process for each data row that incorporates SME sign-off from GRC, WMP, and RAMP teams, reducing errors and ensuring compliance with the request parameters.

5. Conclusion

PG&E appreciates the efforts of BVNA and Energy Safety in recognizing the significant progress and ongoing initiatives reflected in PG&E's 2025 WMP implementation. PG&E also values the observations and recommendations included in the report, which will help inform lessons learned

¹² *Id.* at 131.

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and continuous improvement efforts throughout the 2025 WMP cycle. We look forward to continuing our collaboration with the Independent Evaluator and Energy Safety as we work toward our shared goal of reducing wildfire risk and preventing catastrophic wildfires.

Very truly yours,

/s/ Daniel Kushner

Daniel Kushner, PhD