



February 10, 2025

Jay Leyno
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300 Lakeside Drive
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SUBJECT: Office of Energy Infrastructure Safety Decision for Pacific Gas and Electric Company's 2025 Change Order Request pertaining to its 2023-2025 Wildfire Mitigation Plan

Mr. Leyno:

The Office of Energy Infrastructure Safety (Energy Safety) has evaluated Pacific Gas and Electric Company's (PG&E's) 2025 Change Order Request pertaining to its 2023-2025 Wildfire Mitigation Plan (WMP), pursuant to the Revised 2023-2025 WMP Process and Evaluation Guidelines.¹ Energy Safety hereby approves the two changes requested by PG&E.

On November 19, 2024, Energy Safety approved PG&E's 2025 WMP Update.^{2,3} PG&E submitted a change order request on December 5, 2024, requesting changes to its 2025 initiatives and targets.⁴ Energy Safety received no stakeholder comments on PG&E's Change Order Request.

Below, Energy Safety provides a summary of its determination for each of the two requested changes. Energy Safety evaluated the requested changes pursuant to the criteria set forth in Section 12 of the Revised 2023-2025 WMP Process and Evaluation Guidelines. In executing its WMP, should an electrical corporation deviate from its approved plan, it will have the opportunity to explain or justify such deviations during the compliance process.

¹ [Energy Safety's Revised 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true). (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true, accessed Dec. 10, 2024).

² [Decision for PG&E 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57629&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57629&shareable=true, accessed January 8, 2025)

³ [PG&E's 2023-2025 Base WMP, Revision 7](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57682&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57682&shareable=true, accessed January 8, 2025)

⁴ [PG&E's 2025 Change Order for the 2023-2025 Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57677&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57677&shareable=true, accessed January 8, 2025)

Table 1. Determinations for PG&E-Requested Changes

Initiative ID and Title	Change Requested	Determination	Rationale
GM-01: Asset Inspection Quality Assurance	<p>Due to a previously approved change to add aerial (desktop) inspections,⁵ PG&E proposes eliminating the terms “ground” and “field” from its asset inspection Quality Assurance (QA) audit locations targets.</p> <p>PG&E proposes updating the targets from 500 transmission ground inspection audits and 1,500 distribution ground inspection audits to 500 transmission inspection audits and 1,500 distribution inspection audits.</p>	<p>Approved</p>	<p>The proposed change responds to an updated understanding of risk and is likely to reduce wildfire risk.</p> <p>Aerial inspections are audited by desktop review while ground inspections are audited by field review. Removing “ground” and “field” allows this target to include both ground and aerial inspection QA audits.</p>
GM-09: Asset Inspection Quality Control	<p>Due to a previously approved change to add aerial (desktop) inspections,⁶ PG&E proposes combining Quality Control (QC) desktop audit targets and field audit targets of High Fire Threat District (HFTD) transmission inspections into a single System Inspection Transmission audit target. PG&E proposes doing the same with System Inspection Distribution audit targets.</p> <p>PG&E proposes updating the targets from 16,000 transmission desktop audits, 1,450 transmission field audits, 140,000 distribution desktop audits, and 30,000 field audits to 17,450 transmission audits and 170,000 distribution audits.</p>	<p>Approved</p>	<p>The proposed change responds to an updated understanding of risk and is likely to reduce wildfire risk.</p> <p>Aerial inspections are audited by desktop review while ground inspections are audited by field review. Combining QC desktop and field targets facilitates auditing of PG&E’s increase in aerial inspections by removing the fixed proportion of desktop to field audits.</p>

⁵ [Decision on PG&E’s Change Order Request in Relation to its 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56752&shareable=true), changes to AI-07: Detailed Ground and Aerial Inspections – Distribution, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56752&shareable=true, accessed January 8, 2025)

⁶ [Decision on PG&E’s Change Order Request in Relation to its 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56752&shareable=true), changes to AI-07: Detailed Ground and Aerial Inspections – Distribution (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56752&shareable=true, accessed January 8, 2025)

Summary and Next Steps

Energy Safety approves two of PG&E's two requests, affecting the following initiative(s):

- GM-01: Asset Inspection Quality Assurance
- GM-09: Asset Inspection Quality Control

In accordance with the Revised 2023-2025 Process and Evaluation Guidelines, PG&E must include the approved changes to these targets in future submissions to Energy Safety, including quarterly data reports.

Additionally, PG&E must revise its 2023-2025 Base WMP to reflect the approved changes for 2025 noted above and submit its revised WMP to the 2023-2025 WMP docket no later than February 17, 2025. This revised 2023-2025 Base WMP must represent the WMP approved by Energy Safety on November 19, 2024, with only the changes noted above.

Sincerely,

/s/ Suzie Rose

Suzie Rose
Program Manager, Electrical Safety Policy Division
Office of Energy Infrastructure Safety