



June 25, 2025

To: Pacific Gas and Electric Company  
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**SUBJECT: Office of Energy Infrastructure Safety's Report on Pacific Gas and Electric Company's 2023 Substantial Vegetation Management Audit**

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) completed its final report on Pacific Gas and Electric Company's (PG&E's) 2023 Substantial Vegetation Management (SVM) audit. Energy Safety finds that PG&E substantially complied with the substantial portion of the vegetation management requirements in its 2023-2025 Wildfire Mitigation Plan.

The attached report follows Energy Safety's publication of its SVM audit on February 18, 2025, and PG&E's subsequent response on March 20, 2025. Pursuant to statutory requirements, a copy of this report is issued to PG&E, published on Energy Safety's 2023 SVM Docket<sup>1</sup> and provided to the California Public Utilities Commission.

Sincerely,

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<sup>1</sup> All documents related to PG&E's 2023 SVM audit are available on Energy Safety's e-filing under the "2023-SVM" docket and available here: (<https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2023-SVM>).



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

**2023 SUBSTANTIAL VEGETATION**

**MANAGEMENT AUDIT REPORT**

**PACIFIC GAS & ELECTRIC COMPANY**

June 2025

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# EXECUTIVE SUMMARY

The Office of Energy Infrastructure Safety (Energy Safety) completed an audit of Pacific Gas and Electric Company's (PG&E's) vegetation management commitments from its approved 2023-2025 Wildfire Mitigation Plan (WMP) on February 18, 2025.<sup>1</sup>

The PG&E 2023-2025 WMP had 13 vegetation management initiatives in six programmatic areas.<sup>2</sup> In the PG&E Substantial Vegetation Management Audit (SVM Audit), Energy Safety found that PG&E did not provide information consistent with the completion of all work commitments for six of its 13 vegetation management initiatives.

PG&E submitted its Corrective Action Plan (CAP) addressing the deficiencies identified in the SVM Audit on March 20, 2025.<sup>3</sup> Based on an analysis of PG&E's CAP as well as the analysis included in the 2023 SVM Audit, Energy Safety found that PG&E substantially complied with four of the six deficient initiatives by supplying information and clarifications that demonstrated that either PG&E completed all or the majority of the work, or that PG&E completed other work which achieved the same program objective.

Given that the 2023 SVM Audit found that PG&E completed all work in seven initiatives and this analysis found that it substantially complied with four of the deficient initiatives, PG&E substantially complied with a total of 11 of the 13 vegetation management initiatives. Thus, Energy Safety found that programmatically, PG&E substantially complied with a substantial portion of the vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

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<sup>1</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025),  
(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true>).

<sup>2</sup> [PG&E's 2023-2025 WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024),  
(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true>).

<sup>3</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025),  
(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true>).

# 1. INTRODUCTION

Pursuant to Public Utilities Code section 8386.3(c)(5), Energy Safety must annually audit the vegetation management work performed by, or on behalf of, an electrical corporation. The SVM Audit shall specify any failure of the electrical corporation to fully comply with the vegetation management commitments in its Wildfire Mitigation Plan (WMP).<sup>4</sup> Energy Safety then provides the SVM Audit to the electrical corporation and grants it a reasonable time to correct and eliminate any deficiency therein. The electrical corporation submits its response to the SVM Audit in a Corrective Action Plan (CAP). Following receipt and review of the electrical corporation's CAP, Energy Safety completes an analysis of the CAP and issues an Audit Report to the electrical corporation identifying whether it substantially complied with a substantial portion of the vegetation management requirements in the compliance year.<sup>5,6</sup>

Energy Safety published the 2023 PG&E SVM Audit on February 18, 2025.<sup>7</sup> The Audit concluded that PG&E did not perform all the work specified in six out of the 13 vegetation management initiatives in its 2023-2025 WMP. In response to the SVM Audit, PG&E submitted its CAP on March 20, 2025.<sup>8</sup> Energy Safety reviewed PG&E's CAP and supporting information to determine whether it substantially complied with a substantial portion of their vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

This document is Energy Safety's Report on the 2023 SVM Audit of PG&E. The document is organized as follows:

- Section 2 is a summary of the 2023 SVM findings published in the February 18, 2025 audit.
- Section 3 includes Energy Safety's initiative level (3.1) and programmatic (3.2) compliance analysis of PG&E's CAP and supporting documentation and information.
- Section 4 provides the basis for Energy Safety's conclusion that PG&E substantially complied with a substantial portion of the vegetation management requirements in its 2023-2025 WMP.

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<sup>4</sup> Pub. Util. Code, § 8386.3(c)(5)(A).

<sup>5</sup> Pub. Util. Code, § 8386.3(c)(5)(C).

<sup>6</sup> [2024 Compliance Guidelines](#), Section 8.1, (September 2024), p. 13.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57320&shareable=true>).

<sup>7</sup> [Energy Safety's 2023 SVM Audit of PG&E](#) (Feb. 18, 2025),

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true>).

<sup>8</sup> [PG&E's 2023 SVM Audit CAP](#) (March 20, 2025),

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true>).

## 2. 2023 SVM AUDIT FINDINGS

The 2023 SVM Audit found that PG&E performed all work in seven of the thirteen initiatives and was deficient in the remaining six. Table 1 below is reproduced from Energy Safety's 2023 SVM Audit.<sup>9</sup>

*Table 1. PG&E 2023 SVM Audit Finding Summary*

Programmatic Area	Vegetation Management Initiative	Audit Finding
<b>8.2.2. Vegetation Management Inspections</b>	<b>8.2.2.1-3 Vegetation Management Inspections</b>	<b>Did not complete all work</b>
8.2.3. Vegetation and Fuels Management	8.2.3.1 Pole Clearing	Completed all work
<b>8.2.3. Vegetation and Fuels Management</b>	<b>8.2.3.2 Wood and Slash Management</b>	<b>Did not complete all work</b>
8.2.3. Vegetation and Fuels Management	8.2.3.3 Clearance	Completed all work
<b>8.2.3 Vegetation and Fuels Management</b>	<b>8.2.3.4 Fall-In Mitigation</b>	<b>Did not complete all work</b>
8.2.3. Vegetation and Fuels Management	8.2.3.5 Substation Defensible Space	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.6 High-Risk Species	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.7 Fire Resilient Right-of-Ways	Completed all work
<b>8.2.3 Vegetation and Fuels Management</b>	<b>8.2.3.8 Emergency Response Vegetation Management</b>	<b>Did not complete all work</b>
8.2.4 Vegetation Management Enterprise System	8.2.4 Vegetation Management Enterprise System	Completed all work
8.2.5 Quality Assurance and Quality Control	8.2.5 Quality Assurance and Quality Control	Completed all work
<b>8.2.6 Open Work Orders</b>	<b>8.2.6 Open Work Orders</b>	<b>Did not complete all work</b>
<b>8.2.7 Workforce Planning</b>	<b>8.2.7 Workforce Planning</b>	<b>Did not complete all work</b>

<sup>9</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), pp. 4-5, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

### 3. SVM COMPLIANCE ANALYSIS

Energy Safety must assess whether the electrical corporation substantially complied with a substantial portion of the vegetation management requirements in the compliance year.<sup>10</sup> The determination of substantial compliance is based on an analysis of both the electrical corporation's compliance with each vegetation management initiative as well as the program overall.

The initiative level analysis includes:

- 1) **Achievement of Objective-** Determination of whether the electrical corporation's deficiencies, after considering its planned corrective actions, have not detracted from the electrical corporation's ability to achieve the objectives of its vegetation management programs; and
- 2) **Good Faith Effort-** Determination of whether the electrical corporation's effort to fulfill the vegetation management requirement constituted a good faith effort to comply with the vegetation management requirements in the approved WMP.

The programmatic level analysis includes:

- 3) **Completeness-** Determination of whether the electrical corporation completed the large majority of the vegetation management requirements in its approved WMP.

Energy Safety synthesizes the initiative and programmatic analyses to formulate the conclusion regarding substantial compliance with a substantial portion of the vegetation management requirement in PG&E's WMP, which is described in Section 4.

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<sup>10</sup> Pub. Util. Code, § 8386.3(c)(5)(C).



## 3.1 Initiative Level Assessment

### Summary of Initiative Level Compliance

Table 2 includes the six initiatives from PG&E's 2023-2025 WMP for which Energy Safety's 2023 SVM Audit found that PG&E did not complete all work. The table includes Energy Safety's determination of substantial compliance for each initiative based on the analysis below. Energy Safety found that PG&E substantially complied with four of the six deficient initiatives.

*Table 2. Energy Safety's determination of substantial compliance*

<b>Vegetation Management Initiative with Deficiency</b>	<b>Determination of Substantial Compliance</b>
8.2.2 Vegetation Management Inspections	Substantially complied
<b>8.2.3.2 Wood and Slash Management</b>	<b>Did not substantially comply</b>
<b>8.2.3.4 Fall-In Mitigation</b>	<b>Did not substantially comply</b>
8.2.3.8 Emergency Response Vegetation Management	Substantially complied
8.2.6 Open Work Orders	Substantially complied
8.2.7 Workforce Planning	Substantially complied

## 8.2.2 Vegetation Management Inspections

### Summary of Initiative Work Commitments and Activities

The purpose of this initiative was to describe the “Inspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment.”<sup>11</sup> PG&E’s 2023 vegetation inspection activities included multiple programs which assessed vegetation for fall-in risk and minimum distance requirements throughout PG&E’s overhead distribution and transmission electric systems. PG&E’s Inspection Initiative is broken down into 9 program areas as listed below. Within these 9 areas PGE has 11 quantitative commitments and 3 narrative commitments which are basis for the SVM Audit findings. The 8.2.2 Vegetation Management and associated commitments are detailed as follows:

- 8.2.2.1.1 Routine Transmission- including quantitative targets to inspect 17,500 circuit miles using LiDAR and to conduct 17,740 circuit miles of routine ground inspections and a narrative commitment to complete routine NERC inspections by December 31.
- 8.2.2.1.2 Transmission Second Patrol- including a quantitative target to inspect 5,625 circuit miles.
- 8.2.2.1.3 Integrated Vegetation Management- including a quantitative target to inspect 11,194 acres in its IVM Right of Way and IVM Fee Programs.
- 8.2.2.2.1 Distribution Routine Patrol- including a quantitative target to inspect 79,000 circuit miles.
- 8.2.2.2.2 Distribution Second Patrol- including a quantitative target to inspect 43,000 circuit miles in FHSZ, WUI, FRA, HFTD, and HFRA.
- 8.2.2.2.3 Vegetation Management for Operational Mitigations- did not have a target for compliance year 2023.
- 8.2.2.2.4 Tree Removal Inventory- including a quantitative target for inspections of 15,000 trees and two narrative commitments, one regarding reinspection protocols and documentation for trees first identified by its EVM program and another regarding risk prioritization of trees.
- 8.2.2.2.5 Focused Tree Inspections- including a quantitative target of 250 circuit miles for focused tree inspections in areas of concern.
- 8.2.2.3.1 Defensible Space Inspection- including quantitative targets to inspect 131 distribution substations, 55 transmission substations, and 61 hydroelectric substations and powerhouses.

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<sup>11</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

## 2023 SVM Audit Finding

Energy Safety's audit concluded that PG&E completed vegetation management inspection targets for nine of the 11 quantitative targets and two out of three narrative targets included in its 2023-2025 WMP.

The two quantitative targets missed were:

- i. Distribution Second Patrol: based on incomplete information regarding the timing and location of Second Patrol Inspections; and
- ii. Defensible Space Inspections: based on two distribution substation inspections completed outside the specified timeframe.

The one narrative target missed was:

- iii. Tree Removal Inventory: based on incomplete documentation of trees that were first identified by PG&E's EVM program and which no longer require work.

Because of these missed targets; Energy Safety's Audit concluded that PG&E did not complete all work for Initiative 8.2.2 Vegetation Management Inspections.

A summary of audit findings related to each of programs identified as incomplete, PG&E's CAP response to each deficiency, Energy Safety's determination of whether these programs made a good faith effort and achieved the program objective, and a determination of PG&E's substantial compliance at the Initiative level is included below.

### i. Audit Finding Related to PG&E's Distribution Second Patrol Program

PG&E committed to inspecting 43,000 circuit miles under its Distribution Second Patrol Program in the following areas: FHSZ (fire hazard severity zones), WUI (wildland-urban interface), SRA (state responsibility area), FRA (federal responsibility area), HFTD (high fire threat district), and HFRA (high fire risk area).<sup>12</sup> PG&E committed to a six-month offset between the second patrol dates and the 2023 Distribution Routine Patrol inspections.<sup>13</sup> PG&E provided documentation which indicated that it inspected 43,222 circuit miles under its Distribution Second Patrol inspection program but did not provide documentation demonstrating that: (1) all inspections were conducted in the specified areas and (2) all inspections were offset approximately six months from Routine Patrol inspections.<sup>14</sup>

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<sup>12</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), pp. 612, 666, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

<sup>13</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), pp. 612, 666, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

<sup>14</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), p. A-11, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

## i. PG&E's CAP Regarding Distribution Second Patrol Program Finding

In its CAP, PG&E stated that it disagreed with the audit finding and that it completed all work for its 2023 Distribution Second Patrol target.<sup>15</sup> PG&E stated that “While [it] strive[s] to complete Distribution Second Patrol inspections approximately 6 months offset from Distribution Routine patrols, [several factors] could impact the timing of the Second Patrol Inspections.”<sup>16</sup> Further, PG&E referred to its Distribution Vegetation Management Program Standard, TD-7102S Rev. 2 which states that “[t]he Second Patrol inspection cycle is typically planned and patrolled with a six-month offset from the annual patrol inspection date. This timing can vary due to operational or external factors.”<sup>17</sup>

As part of its CAP, PG&E listed factors that could impact the timing of Distribution Second Patrol inspections including: access issues due to weather, lack of permission to inspect properties, agency permitting delays and limited periods to access agency lands, conflicting operation schedules with other WMP programs, and delayed Distribution Routine inspection work which could push back Distribution Second Patrol work.<sup>18</sup> However, PG&E did not provide documentation in its CAP showing the duration of time between the routine and second patrol programs or demonstrating that the timing of the programs may have been impacted by circumstances beyond its control in compliance year 2023.

Lastly, PG&E stated in its CAP that:

During the planning phase, Vegetation Asset Strategy and Analytics (VASA) provides Vegetation Management (VM) Operations with a list of Routine and Second Patrol projects, which includes timelines approximately six months offset of each other for the upcoming work year. VM Operations reviews the timelines being proposed and provides feedback as to whether or not changes need to be made to the timeline based on historical knowledge of the projects in question. Once all parties agree, the Routine and Second Patrol projects are uploaded into One VM prior to the beginning of the work year. The inspection schedules are reviewed on MORs [monthly operating reviews] to consistently review upcoming work/inspections and to identify any additional changes to timeline that may be needed.<sup>19</sup>

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<sup>15</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 3, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

<sup>16</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 3, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

<sup>17</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 3, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

<sup>18</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), pp. 3-4, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

<sup>19</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 4, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

PG&E's CAP did not address its failure to document that all inspections were conducted in the areas specified in its WMP in compliance year 2023, nor did it provide any updated files with this information.

### **i. Energy Safety's Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP Distribution Second Patrol Commitments**

#### **Criteria 1: Achievement of Objective**

Regarding the completion of its Distribution Second Patrol inspections, PG&E made commitments regarding the timing of the inspections (establishing a 6-month offset from Routine Patrol inspections) and location of the inspections (focusing on regions with the highest fire risk).

Regarding PG&E's timing of Distribution Second Patrol inspections, per PG&E's 2023-2025 WMP, "[t]he objective of the Second Patrol is to maintain radial clearance between vegetation and conductors by identifying trees that will encroach within the MDRs [minimum distance requirements] and by identifying dead, dying, and declining trees that may fail and strike conductors."<sup>20</sup> Allowing vegetation that is likely to fail and strike conductors to persist for extended periods of time creates an unnecessary wildfire risk on PG&E's system. To verify that PG&E implemented its inspections on a frequency that minimized this risk, Energy Safety required PG&E to "...provide a corrective action response which supports that circuits were inspected by the project year 2023 Distribution Second Patrol Program approximately six months offset from project year 2023 Distribution Routine Patrol inspections" in the 2023 SVM Audit.<sup>21</sup> However, in its CAP, PG&E only referenced its internal procedures which state that external factors can alter inspection schedules and listed examples of external factors. PG&E did not provide documentation showing the duration of time between its Distribution Routine and Second Patrol inspections. Consequently, PG&E failed to demonstrate that Distribution Second Patrol inspections occurred on a frequency that minimized vegetation encroachment and failure risk in 2023.

Regarding the location of its Distribution Second Patrol inspections, PG&E's target specified that inspections would be completed in the following locations: FHSZ (fire hazard severity zones), WUI (wildland-urban interface), SRA (state responsibility area), FRA (federal

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<sup>20</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), P. 667, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

<sup>21</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), p. A-12, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).



responsibility area), HFTD (high fire threat district), and HFRA (high fire risk area).<sup>22</sup> PG&E did not provide location information for all Distribution Second Patrol inspections completed in 2023 because some 2023 data was collected in PG&E's legacy VM database which did not have the capability to record whether inspections were completed in the locations specified in the target.<sup>23</sup> Energy Safety noted in the 2023 SVM Audit that PG&E began addressing this recordkeeping deficiency by transitioning to a new recordkeeping system (One VM) in 2023.<sup>24</sup> The new system has the capability to document whether inspections are completed in the areas described in PG&E's Distribution Second Patrol inspection target. While PG&E's transition to the One VM system demonstrates program maturity, PG&E did not collect the entirety of its Distribution Second Patrol inspection data using the One VM system in 2023 and consequently, Energy Safety could not verify that all inspections were completed in the specified locations in 2023. Thus, Energy Safety could not verify that PG&E completed all of these inspections in the highest risk areas of its service territory in 2023. Performing inspections in the areas specified in the WMP maximizes wildfire risk reduction on PG&E's system. Energy Safety will continue to assess PG&E's documentation of its Distribution Second Patrol inspection location information in future compliance cycles.

Because PG&E failed to demonstrate that it met the timing and location requirements of its Distribution Second Patrol inspection requirements in its WMP, Energy Safety found that it failed to achieve the objective of this initiative.

## Criteria 2: Good Faith Effort

PG&E asserts in its CAP that it met all of the requirements of its Distribution Second Patrol Target and that its procedures allow for its Distribution Routine and Second Patrol inspections to be completed more than six months apart if external factors delay inspection schedules. However, without documentation, Energy Safety could not verify the duration of time between the two inspection activities nor when and how often inspection schedules were delayed due to external factors. Without this documentation, PG&E did not demonstrate that it made a good faith effort to meet its requirement of completing Distribution Second Patrol inspections approximately six months offset from its Distribution Routine Patrol inspections.

PG&E's CAP also states that it completed all of its Distribution Second Patrol inspections in the areas specified in its WMP in 2023. However, due to a recordkeeping deficiency in PG&E's legacy VM database, Energy Safety could not verify that all Distribution Second Patrol inspections were completed in the locations specified. This recordkeeping

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<sup>22</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), P. 612, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

<sup>23</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), p. A-12, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

<sup>24</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), p. A-12, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

deficiency does not indicate that PG&E made a good faith effort to ensure its inspections were focused in areas with the highest wildfire risk in 2023. However, PG&E demonstrated program maturity by transitioning to its One VM application, which will allow it to track inspection location information at a more granular level and verify that all Distribution Second Patrol inspections are completed in the areas specified in its target in future compliance cycles. Energy Safety will continue to assess PG&E's documentation of its Distribution Second Patrol inspection location information in future compliance cycles.

## **ii. Audit Finding Related to PG&E's Defensible Space Inspections – Distribution Substation**

PG&E committed to inspecting 131 distribution substations under its substation defensible space program, following its internal procedure LAND 4001P-01.<sup>25</sup> Energy Safety found that PG&E conducted inspections at all 131 substations. However, two inspections took place in June 2023, outside the specified timeframe of November 15 of the prior year to May 31 of the current year.<sup>26</sup>

## **ii. PG&E's CAP Regarding Defensible Space Inspections – Distribution Substation Finding**

In its CAP, PG&E stated that the two substation defensible space inspections that took place on June 6, 2023 and June 12, 2023 were inspected outside the timeframe established in Procedure Land-4001P-01 due to heavy snow and closed roads that made the substations inaccessible for inspection any earlier in the year.<sup>27</sup> Further, PG&E stated that the road closures due to the heavy snow loads was an example of “external factors” and cited its 2023-2025 WMP which states that the execution of all objectives can be effected by external factors including but not limited to physical conditions.<sup>28</sup>

As part of its CAP, PG&E provided email correspondence from May 2023 between PG&E's vegetation management teams alerting staff that the inspections would be delayed due to heavy snow loads and road closures.<sup>29</sup> The emails indicated that inspectors attempted to inspect the substations in May but that snow conditions made it unsafe for the inspectors to

<sup>25</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), p. 609, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

<sup>26</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), p. A-18, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

<sup>27</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 6, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

<sup>28</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), p. 370, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

<sup>29</sup> PG&E's 2023 SVM Audit CAP (March 20, 2025), attachment “DRU15176\_DS\_Atch01\_VM-05\_RFE-DSI\_CONF.pdf.”

access the substations. PG&E also included photographs taken during the attempts made in May. The photographs indicated that the access roads were seasonally closed by the Forest Service and had heavy amounts of snow covering the road surface making it unsafe to access the substations.<sup>30</sup>

## **ii. Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP**

### **Criteria 1: Achievement of Objective**

PG&E's CAP submission demonstrated its effort to complete all 131 distribution substation defensible space inspections within the timeframe specified in Procedure LAND 4001P-01. However, external challenges, such as seasonal road closures and heavy snow loads, delayed two inspections until early June. Despite this minor delay, PG&E successfully completed all inspections, with the two outstanding ones occurring two weeks beyond the designated period. Energy Safety concluded that PG&E achieved the objective of this initiative and that the delay was justified and did not detract from its ability to mitigate wildfire risk in 2023.

### **Criteria 2: Good Faith Effort**

The additional information provided in PG&E's CAP indicated that PG&E made a good faith effort to complete all distribution substation defensible space inspections within the timeframes established in Procedure LAND 4001P-01. However, external factors that made it unsafe for inspectors to complete two of the targeted inspections within the established timeframe caused PG&E to complete two inspections outside the committed timeframe, in June 2023, when conditions improved.

## **iii. Audit Finding Related to PG&E's Tree Removal Inventory Program**

PG&E committed to uploading digital records of completed Tree Risk Assessment Qualification (TRAQ) forms to its Field Maps application whenever a TRAQ-certified arborist determined that a tree, originally scheduled for work under PG&E's Enhanced Vegetation Management (EVM) Program, no longer required work.<sup>31</sup> A TRAQ certified arborist identified

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<sup>30</sup> PG&E's 2023 SVM Audit CAP (March 20, 2025) attachments "DRU15176\_DS\_Atch01\_VM-05\_RFE-DSI\_CONF.pdf," "DRU15176\_DS\_Atch02\_CP 051723 access.pdf," "DRU15176\_DS\_Atch03\_CP 051723.pdf," "DRU15176\_DS\_Atch04\_Ridge Cabin\_051823.pdf."

<sup>31</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), p. A-15, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

9,255 such trees. However, PG&E did not attach completed TRAQ forms in Field Maps for 355 tree records out of the 9,255 (4%) trees inspected in 2023.<sup>32</sup>

### iii. PG&E's CAP Regarding Tree Removal Inventory Program Finding

Energy Safety's 2023 SVM Audit finding was based on tree records provided to Energy Safety by PG&E on October 7, 2024.<sup>33</sup> As part of its CAP, PG&E provided an Excel file which contained updated information for the tree records.<sup>34</sup> The Excel file with updated tree record information indicated that of the 355 trees identified in the 2023 SVM Audit as missing TRAQ forms, PG&E has since uploaded TRAQ forms to Field Maps for 66 of those trees. Additionally, the status of one tree has been updated to "tree work complete," and 18 trees now have a status of either "pending work" or "constrained." Based on the updated information, these trees are no longer required to have a completed TRAQ form on record.

Additionally, 215 trees have since been determined to either not have strike potential to PG&E's facilities or had already been removed. As part of its CAP response, PG&E also provided its Tree Removal Inventory Program Procedure. The procedure states that it is not necessary to upload a TRAQ form for the following reasons: "no overhead lines are present," "tree does not exist," "tree does not have the potential to fall into or otherwise impact the facilities."<sup>35</sup> Per the procedure's direction, a TRAQ Certified Arborist was not required to complete a TRAQ form as part of the assessment for these 215 trees.

Lastly, as of March 20, 2025, PG&E stated that 55 trees that require a TRAQ form to be attached to their digital records in Field Maps still did not have TRAQ forms on record. PG&E stated that its "VM operations team continues to work to address these."<sup>36</sup>

As corrective measures, PG&E stated in its CAP that it has established a PowerBI report to identify errors in TRI records, including missing TRAQ forms. PG&E also stated that its operations teams have provided additional coaching to inspectors who have repeatedly missed inputting TRAQ forms, generated error reports for inspectors to address TRI record errors and reviewed procedures when new inspectors are brought onto the TRI project.<sup>37</sup>

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<sup>32</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), p. A-15,

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true>).

<sup>33</sup> Data Request 265, question 5; attachment; "DRU14286\_Q005\_Atch01\_TRI.xlsx."

<sup>34</sup> PG&E's 2023 SVM Audit CAP (March 20, 2025), attachment "DRU15176\_State 2\_Atch01\_Missing355\_CONF.xlsx."

<sup>35</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), pp. 4-5,

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true>).

<sup>36</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), pp. 4-5,

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true>).

<sup>37</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 5,

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true>).

### iii. Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

#### Criteria 1: Achievement of Objective

The trees inspected under the TRI program in 2023 were first prescribed for mitigation work under PG&E's legacy EVM Program. The documentation PG&E provided indicated that a TRAQ certified arborist identified 9,255 trees that were originally assigned mitigation work under PG&E's legacy EVM program but no longer required work when re-assessed during the TRI program in 2023. The arborist was required to assess each of those trees using a TRAQ form, which provides a standardized process for evaluating tree risk to PG&E's infrastructure. PG&E was able to provide documentation supporting that a TRAQ form was completed and uploaded to the Field Maps application for 9,200 (99%) of those 9,255 trees identified as no longer requiring work. However, as indicated in PG&E's CAP, 55 (1%) of those trees are still missing TRAQ forms in their digital records in Field Maps. Without a completed TRAQ form, PG&E cannot confirm that the decision to no longer require mitigation work on those trees was based on a standardized assessment of each tree's strike potential to PG&E's infrastructure by a TRAQ-certified arborist as required in its 2023-2025 WMP. Without this information, PG&E does not know how much risk these trees pose to PG&E's infrastructure. Energy Safety expects PG&E to either upload the missing TRAQ forms for the 55 trees to demonstrate that the trees no longer require mitigation work or to complete the originally prescribed mitigation work if deemed necessary. However, because the deficiency in documentation applied to less than one percent of the 9,255 trees inspected under the TRI Program in compliance year 2023, Energy Safety found that PG&E performed the majority of the work for this portion of the initiative and achieved the objective.

#### Criteria 2: Good Faith Effort

Energy Safety found that PG&E properly documented over 99% of the trees that a TRAQ certified arborist determined no longer required work in 2023. Furthermore, PG&E's CAP response committed to correcting the record for the remaining 55 trees. This demonstrates that PG&E made a good faith effort to maintain accurate TRI records in accordance with its 2023-2025 WMP.

### Determination of Substantial Compliance for Initiative 8.2.2 Vegetation Management Inspections

As described above, PG&E's 2023-2025 WMP included vegetation inspection activities in nine program areas. These programs included 11 quantitative commitments and 3 narrative commitments. Energy Safety's audit concluded that PG&E completed vegetation management inspection targets for nine of the 11 quantitative targets and two out of three narrative targets included in its 2023-2025 WMP.



In its CAP, PG&E was able to provide sufficient documentation to support that it made a good faith effort to achieve the objective of its Substation Defensible Space and Tree Removal Inventory Programs. While PG&E provided documentation to demonstrate that it completed the targeted number of circuit miles for both its Distribution Routine and Second Patrol inspections in 2023, it did not provide documentation demonstrating that the two programs were approximately six months offset from one another, nor that all of the inspections occurred in the areas of its service territory that are at highest risk for wildfires. However, PG&E was able to provide corrective actions to address these recordkeeping deficiencies in future compliance years.

Given that PG&E completed the majority of the work commitments included in initiative 8.2.2 Vegetation Management inspections, including 10 of the 11 quantitative targets, all three of the narrative commitments, and completed the required circuit miles for the deficient quantitative target, Energy Safety concluded that PG&E substantially complied with this initiative.

### 8.2.3.2: Vegetation and Fuels Management- Wood and Slash Management

#### Summary of Initiative Work Commitments and Activities

The purpose of this initiative was to take actions “to manage all downed wood and ‘slash’ generated from vegetation management activities.”<sup>38</sup> PG&E’s 2023 wood and slash management activities included the management of debris less than four inches in diameter as well as larger wood greater than four inches in diameter generated by vegetation management activities.

#### 2023 SVM Audit Finding

PG&E committed to managing debris generated by vegetation management activities in accordance with applicable regulations and owner preferences. PG&E was able to provide documentation that wood greater than four inches in diameter was hauled off site or processed on site as requested by property owners. However, PG&E was unable to provide documentation that debris less than four inches in diameter was managed as described in PG&E’s 2023-2025 WMP.<sup>39</sup> Therefore, PG&E did not provide information consistent with the completion of work required under initiative 8.2.3.2 Wood and Slash Management.

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<sup>38</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>39</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

## PG&E's CAP Response

In its CAP, PG&E stated that “[it] directs its vegetation management crews to complete debris treatment in coordination with tree work. This expectation is clearly defined in our contract specification, ‘Specific Conditions No. 5404 for Vegetation Management (VM) Tree Trimming and Brush Removal.’<sup>40</sup>” As part of its CAP, PG&E provided a screenshot of the contract language which described requirements that PG&E’s contractors must follow. One of the requirements being “remove or mitigate all material 4” and less in diameter from work site and wood management (when prescribed) completed within 5 business days.”<sup>41</sup>

PG&E also stated in its CAP that “although our crews did in fact complete debris treatment in coordination with tree work, the existing work management platform at that time did not accommodate separate and distinct documentation of debris treatment. When tree work was logged as completed in the database, it also implicitly included the completion of associated debris treatment.”<sup>42</sup>

## Energy Safety's Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

### Criteria 1: Achievement of Objective

Energy Safety acknowledges that PG&E included wood and slash management requirements in its vendor contracts. However, PG&E could not provide documentation that debris less than four inches in diameter resulting from its vegetation management activities was removed.<sup>43</sup> Without this documentation, Energy Safety cannot verify that all wood and slash management work was completed in 2023 in accordance with its 2023-2025 WMP requirements. The improper management of debris less than four inches in diameter could create an unnecessary increase of ground fuels which could exacerbate wildfire spread. Therefore, it is critical for PG&E to keep accurate records of all wood and slash management work including debris that is less than four inches in diameter. Energy Safety found that PG&E’s recordkeeping deficiencies detracted from PG&E’s ability to achieve this initiative’s objective which is to manage all wood and slash management work.

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<sup>40</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 6, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

<sup>41</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 7, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

<sup>42</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 6, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

<sup>43</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), p. 680, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

## Criteria 2: Good Faith Effort

PG&E's inclusion of wood and slash management requirements in its vendor contracts indicated that PG&E understood the need to manage all debris generated by vegetation management activities. However, PG&E relies on an implicit assumption that debris management work was completed whenever a work order was marked as complete. However, without documentation, PG&E cannot verify that its contractors have completed this work. Therefore, PG&E did not make a good faith effort to track its wood and slash management to ensure that ignition risk related to the accumulation of debris generated by its vegetation management activities was mitigated.

## Initiative Level Determination

PG&E was unable to demonstrate that debris less than four inches in diameter generated by PG&E's vegetation management activities was managed in accordance with its 2023-2025 WMP. PG&E could only demonstrate that wood greater than four inches in diameter was managed when customers opted in to PG&E's wood management program. PG&E included requirements in its vendor contracts which required its vendors to complete debris management work in coordination with tree work. However, the objective of the initiative is "to manage all downed wood and 'slash' generated from vegetation management activities."<sup>44</sup> Energy Safety found that PG&E did not track its wood and slash management work in 2023. Energy Safety expects PG&E to create new fields in its databases that record when debris management work is completed. This will allow PG&E to ensure that ignition risk associated with the accumulation of vegetation management debris near its infrastructure is mitigated. For compliance year 2023, PG&E failed to demonstrate that ignition risk related to the accumulation of vegetation management debris was mitigated and therefore, Energy Safety concluded that PG&E did not substantially comply with this initiative.

### 8.2.3.4: Vegetation and Fuels Management- Fall-in Mitigation

## Summary of Initiative Work Commitments and Activities

The purpose of this initiative was to take actions "to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment."<sup>45</sup> In 2023, PG&E implemented three new VM Programs that support

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<sup>45</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), p. A-24, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

fall-in mitigations: VM for Operational Mitigations (VMOM), TRI, and FTI Inspections.<sup>46</sup> PG&E also set a requirement in its 2023-2025 WMP to complete mitigation work on any dead or dying tree identified by its Distribution Second Patrol program within 180 days if the tree was identified in the HFTD and within 365 days if the tree was identified in non-HFTD.

## 2023 SVM Audit Finding

Energy Safety found that PG&E provided documentation to demonstrate that it began implementing its FTI, TRI, and VMOM programs as committed to in its 2023-2025 WMP.<sup>47</sup> PG&E also committed to mitigating the fall-in risk from dead and dying trees identified in its Second Patrol Inspections program.<sup>48</sup> The program prescribed work to 47,689 dead or dying trees that could strike PG&E's facilities in 2023. However, PG&E did not complete all of this work within the timeframes committed to in its WMP. Energy Safety found that 5,079 out of those 47,689 (10.7%) trees were completed outside the committed timeframes and 3,653 out of those 47,689 (7.7%) trees had no work completion date. Therefore, Energy Safety found that PG&E completed only 82% of identified work within the timeframes stated in its 2023-2025 WMP.<sup>49</sup>

## PG&E's CAP Response

In its CAP, PG&E stated that a majority of the delayed work was attributed to constraints, and referenced its 2023-2025 WMP which stated that “[all] targets in the... Revised Table 8-14 and Revised Table 8-15 [of PG&E's 2023-2025 WMP] are subject to External Factors, which represent reasonable circumstances that may impact execution against targets including, but not limited to, physical conditions, landholder refusals, environmental delays, customer refusals or non-contacts, permitting delays/restrictions, weather conditions, removed or destroyed assets, active wildfire, exceptions or exemptions to regulatory/statutory requirements, and other safety considerations.”<sup>50</sup>

The CAP included an Excel file with updated tree work status for 3,652 of the 3,653 trees identified in the SVM Audit as not having a reported tree work completion date.<sup>51</sup> The Excel

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<sup>46</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), p. 683, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

<sup>47</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), p. A-27, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

<sup>48</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), p. 667, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

<sup>49</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), pp. A-27 to A-29, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

<sup>50</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), p. 605, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

<sup>51</sup> PG&E's 2023 SVM Audit CAP (March 20, 2025), attachment “DRU15176\_Statement 8\_Atch01\_1VMUpdate.xlsx.”

file indicated that mitigation work for 1,556 out of the 3,652 (43%) trees has been completed as of March 20, 2025 and 1,612 (44%) were still constrained. The Excel file also included the type of constraint for each tree, such as Refusals, Environmental Review, Agency Managed Lands, and the need for electrical operations personnel to deenergize facilities before work can be done safely. Additionally, 53 (1%) had no associated work constraints as of March 20, 2025, and had been scheduled for work. The remaining 431 (12%) had been reinspected and no longer required work.

## Energy Safety's Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

### Criteria 1: Achievement of Objective

Energy Safety and PG&E agreed that 18% of dead or dying tree mitigation work identified during PG&E's Second Patrols was not completed within the timeframes stated in PG&E's 2023-2025 WMP. PG&E provided Energy Safety with additional documentation clarifying that PG&E allowed for a 365-day mitigation timeframe for dead or dying tree work orders in HFTD Zone 1-Tier 1 High Hazard Zones.<sup>52</sup> While this is not consistent with its 2023-2025 WMP, which states that work identified in HFTD (which includes Zone 1-Tier 1 High Hazard Zones per California Public Utilities Commission's (CPUC's) General Order (GO) 95, Rule 21.2-D) should be mitigated within 180 days, it would account for some of the delayed work identified in the 2023 SVM Audit.

However, PG&E's CAP indicated that as of March 20, 2025, 6,635 trees (14%) were mitigated outside of the committed timeframes and 1,665 out of 47,689 (3%) dead or dying trees with potential to strike PG&E's facilities first identified in 2023 have not been mitigated as of March 2025.<sup>53</sup>

Because PG&E failed to mitigate a significant fraction of the identified fall-in risk within the timeframe requirements of its 2023-2025 WMP, it left risk on its system for a prolonged period of time. The objective of this initiative was "to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment." The fact that a significant fraction of mitigation work was not completed within the timeframes of PG&E's 2023-2025 WMP combined with the fact that dead or dying trees with potential to strike PG&E's facilities that were first identified in 2023 have not been mitigated as of March 20, 2025, indicates that PG&E did not achieve this objective.<sup>54</sup>

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<sup>52</sup> Clarifying Questions to PG&E's 2023 SVM Audit CAP Response 20250501.xlsx.

<sup>53</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), pp. 8-10, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

<sup>54</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), pp. 8-10, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).



## Criteria 2: Good Faith Effort

While PG&E stated in its CAP that a majority of the delayed work was due to constraints, Energy Safety re-analyzed the original data sets provided by PG&E as well as the documentation provided in its CAP and determined that as of March 20, 2025, 6,635 tree records out of 47,689 (14%) exceeded PG&E's stated timeframes, and that only 2,986 (45%) of those records had documented constraints.<sup>55,56</sup> The remaining 3,649 out of 6,635 tree records (55%) were eventually mitigated but the CAP did not include documentation that the delays were attributed to constraints. Without this documentation, Energy Safety concluded that PG&E did not make a good faith effort to meet the mitigation timeframe requirements of its 2023-2025 WMP. Further, the fact that mitigation work for 1,655 out of 47,689 (3%) trees that were expected to fail and strike conductors in 2023 have still not been completed as of March 20, 2025, also indicates that PG&E has not made a good faith effort to mitigate fall-in risks identified during the 2023 compliance year.

## Initiative Level Determination

The documentation PG&E provided demonstrated that it implemented several vegetation inspection programs in 2023 to identify and mitigate fall-in risk on its system. The documentation also demonstrates that while these programs mitigated some of the identified fall-in risk, a significant fraction (18%) of Second Patrol dead or dying tree mitigation work was not completed within the timeframes stated in PG&E's 2023-2025 WMP. Additionally, PG&E's CAP indicated that as of March 20, 2025, 1,665 dead or dying trees (3%) with potential to strike PG&E's facilities first identified in 2023 have not been mitigated. PG&E's delay in completing this work detracted from its ability to reduce wildfire risk from vegetation contact on its system. Therefore, Energy Safety concluded that PG&E did not substantially comply with this initiative.

Dead and dying trees have a high risk of contact with electrical infrastructure, representing a significant ignition risk. Energy Safety expects PG&E to immediately mitigate the 1,655 dead or dying trees that were not mitigated as of March 20, 2025. Energy Safety also expects PG&E to mature its vegetation management programs by completing tree work that reduces risk to PG&E's system in a more expedited manner, and by further building out and developing the "Constraint Resolution Procedural Guidelines"<sup>57</sup> described in PG&E's 2023-2025 WMP to efficiently resolve constrained tree work. Energy Safety also expects PG&E to provide greater transparency to Energy Safety regarding tree work that is delayed without documented

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<sup>55</sup> Data Request 265, question 17; attachments "DRU14286\_Q017\_Atch01\_Legacy.xlsx," "DRU14286\_Q017\_Atch02\_OneVM 2P DaD.xlsx."

<sup>56</sup> PG&E's 2023 SVM Audit CAP (March 20, 2025), attachment "DRU15176\_Statement 8\_Atch01\_1VMUpdate.xlsx."

<sup>57</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), p. 598, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

constraints. Lastly, Energy Safety expects PG&E to clearly describe all fields within the datasets it submits to Energy Safety, ensuring accurate data interpretation and preventing the need for follow-up requests to clarify information.

### 8.2.3.8 Vegetation and Fuels Management- Emergency Response Vegetation Management

#### Summary of Initiative Work Commitments and Activities

The purpose of this initiative was the “planning and execution of vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration.”<sup>58</sup> PG&E’s 2023 emergency response vegetation management work included PG&E’s implementation of its Priority 1 work order procedures which facilitated effective identification and mitigation of trees with elevated fire threat to PG&E’s system on an expedited schedule. PG&E also published a Vegetation Management Post Wildfire Standard document which details the expectations, roles, and responsibilities of PG&E’s VM department in response to a wildfire event and performed hazard tree assessment and hazard tree mitigation work to address trees in burned areas affected by wildfire.<sup>59</sup>

#### 2023 SVM Audit Finding

Energy Safety found that PG&E performed all commitments in its 2023-2025 WMP related to post-wildfire service restoration, but PG&E did not provide sufficient documentation to demonstrate that it mitigated its Priority 1 trees within the timeframes PG&E committed to in its WMP. The WMP states that PG&E must respond to trees with Priority 1 conditions because they present a significant risk during red flag warnings (RFWs) and urgent weather situations.<sup>60</sup>

Energy Safety’s 2023 SVM Audit found that PG&E could not provide documentation to support that six (<1%) of the 7,648 trees PG&E identified as having a Priority 1 condition in 2023 were mitigated within 24 hours.<sup>61</sup> Additionally, 31 Priority 1 work orders were completed late due to recordkeeping deficiencies. However, PG&E was able to provide supporting documentation such as email and text correspondence between VM personnel indicating that

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<sup>58</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-25, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>59</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), pp. A-39 to A-41, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

<sup>60</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), p. 689, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

<sup>61</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), pp. A-37 to A-39, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

these 31 work orders were completed on time but were recorded inaccurately in PG&E's official system of record.<sup>62</sup>

## PG&E's CAP Response

Energy Safety identified six P1 trees which had an imminent strike risk to PG&E's infrastructure and were not mitigated within 24 hours.

In its CAP, PG&E stated that three of the trees were completed on time but were marked completed late due to billing issues. Regarding billing delays, PG&E stated that there are situations where the tree crew invoicing will accidentally select the bill date as the day the tree work was completed and not the actual tree work date.

PG&E stated that one tree was delayed due to Operation Emergency Center (OEC) activation. During times of OEC activation, the scheduling of all work including priority work is based on the direction of the OEC.

PG&E stated that "2 trees... were verified to have been sent out through an internal Priority Tag area group chat on the day the work was identified, but there is no record of whether the work was completed on time."<sup>63</sup>

As part of its CAP, PG&E provided a screenshot of its PowerBI dashboard which tracks Priority 1 work order due dates and is used by VM Regional Managers and Directors during Daily Operating Reviews (DORs) for discussion with their teams.<sup>64</sup> PG&E also provided a screenshot of an email with subject line "Daily Call-Monday Week 9" that was sent to VM staff and highlighted Priority 1 work orders that were coming due or past due.<sup>65</sup> PG&E stated that these emails are sent out daily and use the data from its PowerBI dashboards. Lastly, PG&E stated that the PowerBI dashboard and DORs are "the current mechanisms in place to promote timely completion of P1s [Priority 1] work orders."<sup>66</sup>

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<sup>62</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), pp. A-37 to A-39, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

<sup>63</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), pp. 10-11, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

<sup>64</sup> PG&E's 2023 SVM Audit CAP (March 20, 2025), attachment "DRU15176\_Statement 14\_Atch01\_P1 Dash\_Redacted.pdf."

<sup>65</sup> PG&E's 2023 SVM Audit CAP (March 20, 2025), attachment "DRU15176\_Statement 14\_Atch02\_P Trees\_Redacted.pdf."

<sup>66</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 11, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

### Criteria 1: Achievement of Objective

PG&E's WMP states that "Executing high priority vegetation work in impacted areas can reduce the potential for ignitions in RFW and urgent weather situations".<sup>67</sup> As such, its WMP commits to mitigating vegetation that is "determined to be an immediate risk to PG&E facilities within 24 hours."<sup>68</sup> While PG&E could not demonstrate that three of 7,648 (<1%) trees with Priority 1 conditions were mitigated within its targeted timeframe in 2023, PG&E could demonstrate that 7,642 (99%) trees were. Additionally, PG&E was able to demonstrate that the three trees that PG&E could not demonstrate were mitigated within its targeted timeframe were eventually mitigated in 2023, which demonstrated that PG&E ultimately mitigated all risk to its system that was posed by trees identified with Priority 1 conditions in 2023. Because PG&E completed all identified Priority 1 work orders and had documentation to support that all but three of the work orders were completed in accordance with PG&E's stated timeframe, PG&E demonstrated that it met the objective of this initiative by performing mitigation work as an emergency response to trees with elevated fire threat therefore reducing wildfire risk on its system.

### Criteria 2: Good Faith Effort

PG&E's provided documentation demonstrating that over 99% of the work was completed within the timelines specified by PG&E's 2023-2025 WMP, indicating that PG&E made a good faith effort to follow the procedures of its Priority 1 tree work program in 2023.

### Initiative Level Determination

PG&E completed all work associated with commitments for this initiative with the exception of a small percentage of its Priority 1 work orders that did not have documentation to support that they were completed within the timeframe specified in PG&E's 2023-2025 WMP. Because trees with Priority 1 conditions pose an imminent risk to PG&E's infrastructure, it is critical that these trees are mitigated within the timeframes committed to in its 2023-2025 WMP. Energy Safety expects PG&E to continue utilizing tools, such as the Power BI dashboards and DORs outlined in its CAP, to ensure that ignition risk associated with trees that pose an imminent risk to PG&E's infrastructure are mitigated as soon as possible. However, because

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<sup>67</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), p. 689, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

<sup>68</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), p. 689, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true).

PG&E's provided documentation indicated that it reduced ignition risk on its system by mitigating 99% of trees identified with Priority 1 conditions within the timeframe of its 2023-2025 WMP, that the remaining 3 trees identified with Priority 1 conditions in 2023 were eventually mitigated, and all post-wildfire service restoration commitments were completed, Energy Safety found that PG&E substantially complied with this initiative.

## 8.2.6 Open Work Orders

### Summary of Initiative Work Commitments and Activities

The objective of this initiative was to describe the "Actions taken to manage the electrical corporation's open work orders resulting from inspections that prescribe vegetation management activities."<sup>69</sup> Under the Open Work Orders initiative section of PG&E's 2023-2025 WMP, PG&E included an objective to create a constraint resolution procedural guidelines document and evaluate the potential of creating a "right tree right place" program,<sup>70</sup> and a narrative commitment to complete Priority 2 work orders within 20 business days unless constrained by external factors.<sup>71</sup>

### 2023 SVM Audit Finding

Energy Safety found that PG&E met its objective of establishing a constraint resolution procedural guidelines document and evaluated the potential of creating a "right tree right place" program. However, PG&E did not complete all Priority 2 work orders within the scheduled timeline.<sup>72</sup>

PG&E's 2023-2025 WMP stated that "Currently, there are time constraints in Second Patrol and on Priority Tag work. If an inspector determines that vegetation is an immediate risk to PG&E facilities the Priority Tag Utility Procedure is followed (TD-7102P-17). Under normal conditions, Priority 2 tags are issued for vegetation that is within minimum distance requirements (MDR) to the electric lines and must be mitigated within 20 business days."<sup>73</sup>

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<sup>69</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

<sup>70</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), pp. 288-289, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true>).

<sup>71</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), p. 706, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true>).

<sup>72</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), p. A-53 to A-56, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true>).

<sup>73</sup> [PG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true) (Rev. #4, Jan. 8, 2024), p. 706, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true>).



Energy Safety found that PG&E failed to mitigate 604 out of 81,984 (less than 1%) Priority 2 work orders created in 2023 in accordance with its Procedure TD-7102P-17.<sup>74,75</sup>

## PG&E's CAP Response

In its CAP, PG&E provided an Excel file listing reasons why mitigation work on each of the 604 trees was delayed:<sup>76</sup>

- For 89 trees (15%) work was recorded late due to “billing and/or delayed data entry by tree crew vendors,”
- For 241 trees (40%) work was delayed due to “additional constraints,”
- For 272 trees (45%) work was “completed late by tree crew vendors,”
- The remaining two trees (<1%) no longer required work because property owners conducted the work themselves.

Regarding billing/ delayed data entry, PG&E stated that “...the tree work will show as pending until the contractors invoice it and PG&E approves payment. There are situations where the tree crew invoicing will accidentally select the bill date as the day the tree work was completed and not the actual tree work date.”<sup>77</sup> Regarding additional constraints, the Excel file listed customer refusals, weather delays, and the need for traffic control or line kills as the most common reasons for additional constraints.

PG&E also stated in its CAP that “[i]n recent years, PG&E has improved visibility and tracking of priority timelines, to reduce the number of late completion dates due to constraints or contractor delay.”<sup>78</sup> Such improvements included PowerBI dashboards that track Priority 2 work order due dates, daily emails to highlight Priority 2 work that is coming due or is overdue, and DORs with VM Regional Managers and Directors to discuss Priority 2 work. PG&E provided screenshots of its PowerBI dashboard that tracked Priority 2 work orders in 2023, and email correspondence sent to PG&E's VM teams in 2023 which highlighted Priority 2 work with upcoming due dates.<sup>79</sup>

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<sup>74</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), p. A-55 to A-56,

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true>).

<sup>75</sup> Data Request 276, question 9; attachment “DRU14563\_Q009\_Atch02\_TD-7102P-17 Rev 2 (September 2023)\_Redacted.pdf.”

<sup>76</sup> PG&E's 2023 SVM Audit CAP (March 20, 2025), attachment “DRU15176\_State23\_Atch01\_P2Update\_CONF.xlsx.”

<sup>77</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 12,

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true>).

<sup>78</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 12,

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true>).

<sup>79</sup> PG&E's 2023 SVM Audit CAP (March 20, 2025), attachments “DRU15176\_State 23\_Atch02\_P2 Dash\_Redacted.pdf,” and “DRU15176\_State 23\_Atch03\_P Trees\_Redacted.pdf.”

## Energy Safety's Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

### Criteria 1: Achievement of Objective

PG&E's CAP provided sufficient documentation to demonstrate that over 99% (81,380) of its P2 trees were mitigated according to the procedures identified in its WMP. Further, PG&E was able to provide additional information regarding the 604 trees that were not mitigated according to its procedures. This information indicated that 241 of the 604 P2 trees (40%) were delayed due to allowable constraints and two trees no longer required work. PG&E also stated in its CAP that 89 of the 604 (15%) trees were recorded as completed late in PG&E's system of record due to billing and/or delayed data entry by tree crew vendors and 272 (45%) trees were completed late by tree crew vendors. These trees did not have documented constraints or a reason why they were completed late by the tree crew vendors. PG&E is responsible for ensuring that its tree crew vendors keep accurate records and complete work within specified timeframes.

Energy Safety expects PG&E to mitigate hazardous trees with an elevated risk of striking PG&E's electrical infrastructure as soon as possible. Additionally, PG&E's recordkeeping deficiency related to billing and delayed data entry by tree crews impacts the accuracy of PG&E's data and may affect PG&E's ability to accurately assess the amount of ignition risk on its system. However, this loss in risk reduction was minimal, as a majority of Priority 2 work orders (over 99%) were completed in accordance with PG&E's procedures. Additionally, the other 1% of trees that were not completed in accordance with PG&E's internal procedures because they were mitigated after the procedure's targeted timeframe were eventually completed in 2023, thus addressing all ignition risk posed by trees with Priority 2 conditions in 2023. Furthermore, PG&E indicated in its CAP that it has implemented procedures to track Priority 2 work order schedules and utilizes daily emails to highlight work orders that need immediate attention, demonstrating program maturity. PG&E also demonstrated program maturity by publishing constraint resolution procedural guidelines which provide guidance for resolving constrained vegetation management work in an efficient manner. Given the completion of the majority of Priority 2 work orders in accordance with PG&E's internal procedures and completion of all other commitments associated with this initiative, Energy Safety finds that PG&E achieved the objective.

### Criteria 2: Good Faith Effort

PG&E's completion of over 99% of work in accordance with its internal procedures demonstrates a good faith effort to follow its Priority 2 tree work procedures. Further, PG&E's publication of constraint resolution documents in 2023, in conjunction with

improved Priority 2 work order tracking and daily emails, demonstrates PG&E continues to mature this program and meet the initiative objectives to mitigate hazardous trees.

### Initiative Level Determination

PG&E completed all work associated with commitments in this initiative with the exception of a small percentage of its Priority 2 work orders. As trees with Priority 2 conditions have elevated ignition risk, it is critical that these trees are mitigated within the timeframes dictated by PG&E's internal procedures. Energy Safety expects PG&E to mature its priority tree work program by implementing the procedures described in the constraint resolution documents PG&E published in 2023 and by continuing to utilize tools such as the Power BI dashboards and DORs outlined in its CAP to ensure that trees with Priority 2 conditions are mitigated as soon as possible. However, because PG&E's provided documentation that demonstrated it mitigated 99% of trees with Priority 2 conditions within the committed timeframe, the remaining trees were eventually mitigated in 2023, and all other commitments in this initiative were completed, Energy Safety found that PG&E substantially complied with this initiative.

## 8.2.7 Workforce Planning

### Summary of Initiative Work Commitments and Activities

The purpose of this initiative was to “ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work.”<sup>80</sup> PG&E's 2023-2025 WMP included narrative commitments to sponsor educational outreach programs that offered vegetation management training to communities across California, and Tree Risk Assessment Qualification (TRAQ) training events for its vegetation management employees. PG&E also set a requirement in its 2023-2025 WMP for vegetation management contractors to complete a training course titled Vegetation Management Inspector (VMI) Basics training before beginning fieldwork.

### 2023 SVM Audit Finding

PG&E provided information demonstrating that it sponsored education outreach programs and TRAQ training events in 2023. However, Energy Safety found that 78 of 1,541 (5%)

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<sup>80</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-26, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

vegetation management employees that were required to take the VMI Basics training course in 2023 began work in the field before completing the entire course.<sup>81</sup>

## PG&E's CAP Response

PG&E stated in its CAP that the employees began work in the field prior to completing all training requirements due to “human error,” and that its training system in 2023 required manual assignment, tracking, and oversight by supervisors.”<sup>82</sup>

PG&E also stated that “... in 2024, PG&E shifted the process of tracking trainings manually and conducting post-training audits to a new system of profiling trainings within the PG&E MyLearning system, which is part of the PG&E Academy. With profiled training, users are automatically assigned trainings based on their roles. Once trainings are profiled, users will have a defined time to take and complete the course. With this system, users are also sent reminders to complete their profiled trainings on time, and their completion status is visible in PG&E's My Learning System. Confirmation of completed trainings can be easily conducted through this new profiled trainings system. Training timeliness is also reviewed in Operating Reviews with supervisors and managers so that they can address with their teams as necessary.”<sup>83</sup>

## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

### Criteria 1: Achievement of Objective

PG&E's CAP indicated that PG&E identified deficiencies and implemented improvements to its training system's recordkeeping in 2024. Furthermore, 95% of PG&E employees completed the training requirements prior to beginning work in the field, all employees eventually received the training, and PG&E has implemented improvements to its training recordkeeping to prevent deficiencies in training moving forward; therefore, Energy Safety finds that PG&E achieved the objective for this initiative.

### Criteria 2: Good Faith Effort

PG&E acknowledged the issues with some employees beginning field work prior to completing all required training and has implemented procedures to its MyLearning

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<sup>81</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), p. A-57, (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

<sup>82</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 13, (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

<sup>83</sup> [PG&E's 2023 SVM Audit CAP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 13, (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true).

system which has corrected the issue and should prevent these occurrences in future compliance years suggesting that PG&E has also made a good faith effort to address the training issues identified in this initiative.

### Initiative Level Determination

PG&E's CAP indicated that PG&E identified deficiencies and implemented improvements to its training system's recordkeeping in 2024 that will address the deficiency identified in this initiative. Additionally, Energy Safety's 2023 SVM Audit found that PG&E completed all other commitments outlined in the Workforce Planning Initiative which included sponsoring TRAQ training events dedicated to PG&E's vegetation management employees, and education outreach programs that provided vegetation management training to communities throughout California.<sup>84</sup> PG&E's implementation of these programs demonstrated that it took actions in 2023 to ensure it had a qualified vegetation management workforce.

Energy Safety found that PG&E substantially complied with this initiative by completing a substantial amount of the work described and by indicating in its CAP that it has taken actions to improve its training system's recordkeeping in 2024.

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<sup>84</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), pp. A-57 to A-59 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).

## 3.2 Programmatic Assessment

Energy Safety's SVM Audit, dated February 18, 2025, found that PG&E completed all work in seven of the 13 initiatives in its 2023-2025 WMP and was deficient in six. PG&E's CAP, dated March 20, 2025, sufficiently addressed four of the six deficient initiatives by supplying additional information which demonstrated that either PG&E completed all or the majority of the work, or that PG&E completed other work within the initiative which achieved the same program objective. However, PG&E's CAP did not provide sufficient documentation demonstrating that it completed work for the remaining two initiatives, Wood and Slash Management and Fall-In Mitigation, identified in the SVM Audit.

Energy Safety's 2023 SVM Audit identified delayed work, as well as recordkeeping and documentation issues within several of PG&E's vegetation management programs that required corrective actions.

Regarding PG&E's delayed response time to mitigation work, Energy Safety has identified year over year missed targeted mitigation timelines for dead or dying trees with fall-in risk to PG&E's infrastructure. Dead and dying trees have a high risk of contact with electrical infrastructure, representing a significant ignition risk. This deficiency, which PG&E has not disputed, was identified in both the 2022<sup>85</sup> and 2023 SVM Audits<sup>86</sup>. In 2022, 15% of dead or dying trees with strike potential to PG&E's infrastructure identified through the Distribution Second Patrol Program were not mitigated within the timeframes specified in PG&E's 2022 WMP Update. The 2023 audit finding indicates that this issue remains unresolved because 8,732 of 47,689 (18%) dead or dying trees with strike potential to PG&E's infrastructure that were identified by the Distribution Second Patrol Program in 2023 were not mitigated within the timeframes specified in PG&E's 2023-2025 WMP.

While PG&E did not complete a significant portion of dead or dying tree work identified by its Distribution Second Patrol Program within its targeted timeframes in 2022 or 2023, PG&E met its targeted mitigation timeframes for 99% of Priority 1 work orders created in 2023, demonstrating an improvement from its 2022 compliance cycle. PG&E also completed 99% of Priority 2 work orders in accordance with its internal procedures in 2023 and demonstrated an improvement in its documentation of constraints associated with this program. PG&E also published constraint resolution procedural guidelines in 2023 which outlined how to effectively document and resolve customer, environmental, and permitting constraints associated with vegetation management work. While Energy Safety acknowledges that some vegetation management work will be delayed due to constraints, it expects PG&E to utilize the constraint resolution procedural guidelines to effectively document and resolve

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<sup>85</sup> [Energy Safety's 2022 SVM Audit Report of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57509&shareable=true) (October 11, 2024), pp. 18-19, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57509&shareable=true).

<sup>86</sup> [Energy Safety's 2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (Feb. 18, 2025), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true).



constraints in a timely manner and minimize the amount of time that vegetation management work is delayed.

Regarding PG&E's recordkeeping issues, Energy Safety concluded that PG&E did not substantially comply with its Wood and Slash Management Initiative due to a failure to provide sufficient documentation to demonstrate the work was completed. While PG&E's CAP indicated that its vendor contracts require that debris less than four inches in diameter is managed in coordination with tree work, Energy Safety's 2023 SVM Audit found that PG&E only tracks the management of wood greater than four inches in diameter and that smaller diameter debris is not recorded. Therefore, PG&E did not demonstrate that all wood and slash management activities described in PG&E's 2023-2025 WMP were completed. As the improper management of debris less than four inches could create an unnecessary increase of ground fuels which could exacerbate wildfire spread, it is critical for PG&E to keep accurate records of all wood and slash management work including debris that is less than four inches in diameter.

In addition to its deficiency in Wood and Slash Management, Energy Safety also identified recordkeeping issues in PG&E's priority work order, TRI, training, and Distribution Second Patrol programs. Energy Safety expects PG&E to mature its vegetation management programs to resolve the recordkeeping issues identified in these programs. However, because the recordkeeping issues affected only 1% of work in PG&E's priority work order, TRI and training programs, Energy Safety concluded that these recordkeeping issues did not significantly increase ignition risk to PG&E's system. Additionally, PG&E has transitioned to its One VM system which is intended to allow PG&E to keep more accurate records of its Distribution Second Patrol Program as it relates to inspection location information.

Overall, Energy Safety finds that PG&E has substantially complied with 11 of its 13 vegetation management initiatives. For the two deficient initiatives, Wood and Slash Management, and Fall-In Mitigation, Energy Safety concluded that although PG&E failed to record all aspects of its wood and slash management activities thus preventing it from ensuring that ignition risk related to the accumulation of debris near its infrastructure was mitigated, PG&E did include requirements in its vendor contracts to complete such work. Additionally, although PG&E did not mitigate a significant portion of dead or dying trees identified by its Distribution Second Patrol Program within its targeted timeframes, PG&E implemented three other vegetation management programs in 2023 with overlap in scope that also mitigated fall-in risk to PG&E's system in 2023. Therefore, programmatically PG&E completed the majority of the work described in its 2023-2025 WMP, has identified deficiencies in its program, and has begun to take actions to correct these deficiencies. Therefore, Energy Safety finds that programmatically, PG&E substantially complied with the vegetation management work described in its 2023-2025 WMP for compliance year 2023.

## 4. Conclusion

Based upon the analysis discussed in Section 3, Energy Safety concluded that PG&E substantially complied with a substantial portion of the vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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