

September 05, 2025

BY ELECTRONIC COMMUNICATION

Tony Marino, Deputy Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: **Submission of PG&E's 2026-2028 Wildfire Mitigation Plan Revision Notice Response Non-Substantive Errata**

Dear Deputy Director Marino:

Pursuant to Section 7 of the Office of Energy Infrastructure Safety (Energy Safety) Policy Division Process Guidelines (Process Guidelines), Pacific Gas and Electric Company (PG&E) hereby submits its non-substantive errata for the 2026-2028 WMP Revision Notice Response.

The non-substantive corrections were identified during our review of the Revision Notice Response. In addition, PG&E also identified several non-substantive issues outside the scope of the Revision Notice Response, which Energy Safety has approved for inclusion. The non-substantive changes are intended to improve clarity.

The errata are as follows:

- Attachment 1: Summary table of identified non-substantive errata including narrative updates and corrections, table updates, and formatting corrections.
- Attachment 2: Updated Table 8-1: Grid Design, Operation, And Maintenance Targets By Year in the Revision Notice Response.
- Attachment 3: Updated Table 9-1: Vegetation Management Targets By Year (Non-Inspection Targets) in the Revision Notice Response.
- Attachment 4: Updated Table 9-2: Vegetation Inspections and Pole Clearing By Year in the Revision Notice Response.
- Attachment 5: Updated Table 8-1: Grid Design, Operation, And Maintenance Targets By Year in the 2026-2028 Base WMP.
- Attachment 6: Updated Table PG&E-8.2.1-4: Covered Conductor And Undergrounding Impacts On The Likelihood Of Ignition in the 2026-2028 Base WMP.
- Attachment 7: Updated Table PG&E-8.3-1: Asset Inspection Frequency, Method, And Criteria in the 2026-2028 Base WMP.
- Attachment 8: Updated Figure PG&E-8.3.8.2-1: Inspection Selection Process in the 2026-2028 Base WMP.
- Attachment 9: Updated Table 9-1: Vegetation Management Targets By Year (Non-Inspection Targets) in the 2026-2028 Base WMP.
- Attachment 10: Updated Table 9-2: Vegetation Inspections And Pole Clearing By Year in the 2026-2028 Base WMP.

- Attachment 11: Updated Figure 9.2.2.1-1: Inspection Selection Matrix in the 2026-2028 Base WMP.
- Attachment 12: Updated Table 10-1: Situational Awareness Targets By Year in the 2026-2028 Base WMP.
- Attachment 13: Updated Table 11-1: Emergency Preparedness And Community Outreach Targets By Year in the 2026-2028 Base WMP.
- Attachment 14: Updated Table 12-1: Enterprise Systems Targets in the 2026-2028 Base WMP.
- Attachment 15: Updated Table 13-2: Lessons Learned From Discontinued Activities in the 2026-2028 Base WMP.

Please let us know if you need any additional materials or clarifications.

Sincerely,

_____/S/____

Jay Leyno
Director, Wildfire Mitigation PMO

Attachment 1

Errata to Pacific Gas and Electric Company's 2026-2028 Wildfire Mitigation Plan Revision Notice Response

	Issue/Reason for Correction	Location of Issue in the	Adjustment(s) Made
1	Formatting update to correct hyperlink	RNR R0: Critical Issue RN-PGE-26-02, P. 3-4	Corrected non-working hyperlink to Table 5-5B
2	Table update to correct incorrect page numbers	RNR R0: Table 8-1: Grid Design, Operation, And Maintenance Targets By Year, P. 23-24	Replaced Table 8-1 with corrected page numbers. See Attachment 2 below
3	Formatting update to correct hyperlink	RNR R0: Critical Issue RN-PGE-26-07, P. 30	Corrected hyperlink reference: HFTD/HFRA switches are inspected aerially once every 3 years via routine detailed drone-based inspections ¹⁴ and infrared inspections. ¹⁵ Table PG&E-RN-PGE-26-07-01 PG&E-RN-PGE-26-07-02 below depicts the find rates of these two routine inspections for the years 2022-2024.
4	Table update to correct section reference	RNR R0: Table 9-1: Vegetation Management Targets By Year (Non-Inspection Targets), P. 42	Replaced Table 9-1 with correct section; page number reference for Activity (Tracking ID) VM-26 9.4; p. 388 to 9.2.1; p. 365 See Attachment 3 below

	Issue/Reason for Correction	Location of Issue in the	Adjustment(s) Made
5	Table update to correct incorrect page numbers	RNR R0: Table 9-1: Vegetation Management Targets By Year (Non-Inspection Targets), P. 42	Replaced Table 9-1 with corrected page numbers. See Attachment 3 below
6	Table update to include missing footnote	RNR R0: Table 9-2: Vegetation Inspections and Pole Clearing By Year, P. 45	Replaced Table 9-2 to include missing footnote. (e) In response to Critical Issue RN-PGE-26-09, PG&E created a target for Mitigation of Legacy Tree Removal Inventory (TRI) (VM-26). See Table 9-1 for more information on VM-26. Percent Risk Reduction for 2026 – 2028 has been updated to reflect the removal of the VM-26 from Distribution Routine Patrol. See Attachment 4 below
7	Table update to correct % Risk Reduction for VM-16	RNR R0: Table 9-2: Vegetation Inspections and Pole Clearing By Year, P. 45	Replaced Table 9-2 with updated risk reduction percentages. Changes are reflected in column “% Risk Reduction for 2026, 2027, 2028” for VM-16. See Attachment 4 below
8	Table update to correct incorrect page numbers	RNR R0: Table 9-2: Vegetation Inspections and Pole Clearing By Year, P. 45	Replaced Table 9-2 with corrected page numbers. See Attachment 4 below
9	Table update to correct % Planned in HFTD for 2028 for GH-12	2026-2028 Base WMP R1 Vol.1: Table 8-1: Grid Design, Operation, And Maintenance Targets By Year, P. 179	Replaced Table 8-1 with updated % Planned in HFTD for 2028 for GH-12. 99.90% 99% See Attachment 5 below
10	Table update to correct % Risk Reduction for 2028 for GH-12	2026-2028 Base WMP R1 Vol.1: Table 8-1: Grid Design, Operation, And Maintenance Targets By Year, P. 179	Replaced Table 8-1 with updated % Risk Reduction for 2028 for GH-12. .06% 0.6% See Attachment 5 below

	Issue/Reason for Correction	Location of Issue in the	Adjustment(s) Made
11	Table update to correct typographical error for GH-14	2026-2028 Base WMP R1 Vol.1: Table 8-1: Grid Design, Operation, And Maintenance Targets By Year, P. 179	Replaced Table 8-1 with updated % Planned in HFTD for 2026 for GH-14. n/a 100% 100% See Attachment 5 below
12	Table update to remove unnecessary line item	2026-2028 Base WMP R1 Vol 1: Table PG&E-8.2.1-4: Covered Conductor And Undergrounding Impacts On The Likelihood Of Ignition, P. 198	Replaced Table PG&E-8.2.1-4 with removal of Risk Driver: Wire-to-wire Contact. See Attachment 6 below
13	Table update to remove unnecessary line item	2026-2028 Base WMP R1 Vol.1: Table PG&E 8.3-1: Asset Inspection Frequency, Method, And Criteria, P. 231	Replaced Table PG&E 8.3-1 with removal of Inspection Activity: Aerial Pilot. See Attachment 7 below
14	Figure update to use more precise language	2026-2028 Base WMP R1 Vol.1: Figure PG&E-8.3.8.2-1: Inspection Selection Process, P. 244	Replaced Figure PG&E-8.3.8.2-1 with updated language for clarity. See Attachment 8 below
15	Table update to correct section reference	2026-2028 Base WMP R1 Vol.1: Table 9-1: Vegetation Management Targets By Year (Non-Inspection Targets), P. 360	Replaced Table 9-1 with correct section; page number reference for Activity (Tracking ID) VM-26. 9.4 ;p. 384 to 9.2.1; p. 384 See Attachment 9 below

	Issue/Reason for Correction	Location of Issue in the	Adjustment(s) Made
16	Table update to correct incorrect page number	2026-2028 Base WMP R1 Vol.1: Table 9-1: Vegetation Management Targets By Year (Non-Inspection Targets), P. 360	Replaced Table 9-1 with corrected page number for VM-26. 9.2.1; p. 384 to 9.2.1; p. 365 See Attachment 9 below
17	Table update to correct typographical error in footnote (e)	2026-2028 Base WMP R1 Vol.1: Table 9-2: Vegetation Inspections And Pole Clearing By Year, P. 362	Replaced Table 9-2 with updated footnote. (e) In response to Critical Issue RN-PGE-26-09, PG&E created a target for Mitigation of Legal Legacy Tree Removal Inventory (TRI) (VM-26). See Table 9-1 for more information on VM-26. Percent Risk Reduction for 2026 – 2028 has been updated to reflect the removal of the VM-26 from Distribution Routine Patrol. See 2026-2028 WMP Revision Notice Response R0 for more information. See Attachment 10 below
18	Table update to correct incorrect page number	2026-2028 Base WMP R1 Vol.1: Table 9-2: Vegetation Inspections And Pole Clearing By Year, P. 362	Replaced Table 9-2 with corrected page number for VM-13. 9.2.3; p. 371 374 See Attachment 10 below
19	Table update to correct % HFTD Covered in 2026 for VM-17	2026-2028 Base WMP R1 Vol.1: Table 9-2: Vegetation Inspections And Pole Clearing By Year, P. 362	Replaced Table 9-2 with updated % HFTD Covered in 2026 for VM-17. 400% 39% See Attachment 10 below

	Issue/Reason for Correction	Location of Issue in the	Adjustment(s) Made
20	Table update to correct typographical error in footnote (d)	2026-2028 Base WMP R1 Vol.1: Table 9-2: Vegetation Inspections And Pole Clearing By Year, P. 362	<p>Replaced Table 9-2 with updated footnote.</p> <p>(d) Values have been updated as a result of Substantive Errata filing on April 18, 2025, in accordance with Revision Notice, Section 4 at 21. Note that the values for Pole Clearing Program-Compliance and Pole Clearing Program-Risk Reduction have since been updated in response to Critical Issue RN-PGE-26-10.</p> <p>See Attachment 10 below</p>
21	Formatting update to include missing Tracking ID	2026-2028 Base WMP R1 Vol.1: Section 9.2.1: Distribution Routine Patrol, P. 365	<p>Added missing tracking ID to section.</p> <p>Tracking ID: VM-16, VM-26</p>
22	Figure update to include footnote for clarification	2026-2028 Base WMP R1 Vol.1: Figure 9.2.2.1-1: Inspection Selection Matrix, P. 371	<p>Replaced Figure 9.2.2.1-1 to include footnote.</p> <p>See Attachment 11 below</p>
23	Table update to correct typographical error	2026-2028 Base WMP R1 Vol.1: Table 10-1: Situational Awareness Targets By Year, P. 436	<p>Replaced Table 10-1 with corrected Activity (Tracking ID #).</p> <p>Live Fuel Moisture Data Collection (SA-12)</p> <p>See Attachment 12 below</p>
24	Table update to correct section reference	2026-2028 Base WMP R1 Vol.1: Table 10-1: Situational Awareness Targets By Year, P. 436	<p>Replaced Table 10-1 with correct section; page number reference for Activity (Tracking ID) SA-12.</p> <p>10.2.1; p. 437 10.2.4; p. 446</p> <p>See Attachment 12 below</p>

	Issue/Reason for Correction	Location of Issue in the	Adjustment(s) Made
25	Table update to correct section reference	2026-2028 Base WMP R1 Vol.1: Table 10-1: Situational Awareness Targets By Year, P. 436	Replaced Table 10-1 with correct section; page number reference for Activity (Tracking ID) SA-13. 10.2.1; p. 437 10.2.4; p. 446 See Attachment 12 below
26	Formatting update to include missing Tracking ID	2026-2028 Base WMP R1 Vol.1: Section 10.2.1: Existing Systems, Technologies, and Procedures, P. 437	Added missing tracking ID to section. Tracking ID: SA-12, SA-13
27	Narrative update to include reference to SA-13	2026-2028 Base WMP R1 Vol.1: Section 10.2.1: Existing Systems, Technologies, and Procedures, P. 439	Our weather station coverage is primarily focused on the HFRA of our service territory. The station coverage as of January 13, 2025, is shown in Figure PG&E-10.2.1-1 below. See SA-13 in Table 10-1 in Section 10.1.2 and Section 10.2.4 for more information.
28	Table update to correct incorrect page number	2026-2028 Base WMP R1 Vol.1: Table 11-1: Emergency Preparedness And Community Outreach Targets By Year, P. 484	Replaced Table 11-1 with corrected page numbers. See Attachment 13 below
29	Table update to correct incorrect page number	2026-2028 Base WMP R1 Vol.1: Table 12-1: Enterprise Systems Targets, P. 545	Replaced Table 12-1 with corrected page numbers. See Attachment 14 below
30	Table update to correct incorrect page numbers	2026-2028 Base WMP R1 Vol.1: Table 13-2: Lessons Learned From Discontinued Activities, P. 560,563	Replaced Table 13-2 with corrected page numbers. See Attachment 15 below

Attachment 2

Table 8-1: Grid Design, Operation, And Maintenance Targets By Year
(in the Revision Notice Response)

Initiative	Quantitative or Qualitative Target	Activity (Tracking ID #)	Previous Tracking ID (if applicable)	Target Unit	2026 Target / Status	% Planned in HFTD for 2026	% Planned in HFRA for 2026	% Risk Reduction for 2026	2027 Target / Status	% Planned in HFTD for 2027	% Planned in HFRA in 2027	% Risk Reduction for 2027	2028 Target / Status	% Planned in HFTD for 2028	% HFRA planned in 2028	% Risk Reduction for 2028	Three-Year Total	Section; Page Number
Grid Design, Operations, and Maintenance	Quantitative (Quarterly)	Detailed Inspection – Transmission (AI04)	AI04	Transmission Structures	22,000	96.5%	100%	63.78% (Eyes on Risk)	22,000	96.5%	100%	63.78% (Eyes on Risk)	22,000	96.5%	100%	63.78% (Eyes on Risk)	66,000	8.3.1; p. 235 232
Grid Design, Operations, and Maintenance	Quantitative (Quarterly)	Infrared Inspections – Transmission (AI06)	AI06	Circuit miles	2,500	94.6%	100%	72.95% (Eyes on Risk)	2,500	94.6%	100%	72.95% (Eyes on Risk)	2,500	94.6%	100%	72.95% (Eyes on Risk)	7,500	8.3.3; p. 238 235
Grid Design, Operations, and Maintenance	Quantitative (Quarterly)	Aerial Scan Inspections – Distribution (AI07A) ^(a)	n/a	Distribution Poles	50,000	98%	100%	24% (Eyes on Risk)	20,000	99%	100%	12% (Eyes on Risk)	20,000	98%	100%	9% (Eyes on Risk)	90,000	8.3.8 p. 243 240
Grid Design, Operations, and Maintenance	Quantitative (Quarterly)	Detailed Inspections – Distribution (AI07D) ^(a)	AI07	Distribution Poles	300,000	98%	100%	33% (Eyes on Risk)	305,000	94%	100%	47% (Eyes on Risk)	215,000	98%	100%	48% (Eyes on Risk)	820,000	8.3.8; p. 243 240
Grid Design, Operations, and Maintenance	Quantitative	System Hardening – Undergrounding (GH04)(b)(e)	GH04	Circuit Miles	360 (c)	100%	100%	1.4%	307	100%	100%	2.2%	400	100%	100%	2.4%	1,067	8.2.2; p. 204 201
Grid Design, Operations, and Maintenance	Quantitative	System Hardening – Transmission Shunt Splices (GH06)	GH06	Shunt Splices	250	100%	100%	0.07%	250	100%	100%	0.07%	250	100%	100%	0.07%	750	8.2.5.1; p. 244 208
Grid Design, Operations, and Maintenance	Quantitative	System Hardening – Transmission Conductor Segment Replacement (GH11)	GH11	Conductor Segment	4	100%	100%	0.05%	5	100%	100%	0.05%	6	100%	100%	0.05%	15	8.2.5.1; p. 244 208
Grid Design, Operations, and Maintenance	Quantitative	Overhead Hardening – Distribution (GH12) ^(e)	GH01 (d)	Circuit Miles	294	100%	100%	1.2%	190	98.7%	100%	1.0%	190	99.0%	100%	0.6%	674	8.2.1; p. 187 184
Grid Design, Operations, and Maintenance	Quantitative	Line Removal Enabled by Remote Grid – Distribution (GH14) ^(e)	GH01	Circuit Miles	4	100%	100%	0.04%	0	n/a	n/a	n/a	0	n/a	n/a	n/a	4	8.2.7.1; p. 244 211

TABLE 8-1:
GRID DESIGN, OPERATION, AND MAINTENANCE TARGETS BY YEAR
(CONTINUED)

Initiative	Quantitative or Qualitative Target	Activity (Tracking ID #)	Previous Tracking ID (if applicable)	Target Unit	2026 Target / Status	% Planned in HFTD for 2026	% Planned in HFRA for 2026	% Risk Reduction for 2026	2027 Target / Status	% Planned in HFTD for 2027	% Planned in HFRA in 2027	% Risk Reduction for 2027	2028 Target / Status	% Planned in HFTD for 2028	% HFRA planned in 2028	% Risk Reduction for 2028	Three-Year Total	Section; Page Number
Grid Design, Operations, and Maintenance	Qualitative	Proactive Animal Abatement Feasibility Study – Transmission (GH13)	n/a	n/a	Started; March 2026	n/a	n/a	n/a	In Progress; 2027	n/a	n/a	n/a	Completed; December 31, 2028	n/a	n/a	n/a	n/a	8.2.13.1; p. 229 226
Grid Design, Operations, and Maintenance	Quantitative	Open Tag Reduction – Distribution Backlog (GM03)	GM03	Distribution EC Tags	Close 134% of the count of EC notifications created in HFTD/HFRA in 2025	100%	99%	0.6%	Close 153% of the count of EC notifications created in HFTD/HFRA from 2025 to 2026	100%	99%	0.6%	Close 160% of the count of EC notifications created in HFTD/HFRA from 2025 to 2027	100%	99%	0.6%	n/a	8.6.2; p. 324 321
Grid Design, Operations, and Maintenance	Qualitative	Updates on EPSS Reliability Study (GM07)	GM07	n/a	Completed; February 15, 2026	n/a	n/a	n/a	Completed; February 15, 2027	n/a	n/a	n/a	Completed; February 15, 2028	n/a	n/a	n/a	n/a	8.7.1.1; p. 335 332
Grid Design, Operations, and Maintenance	Quantitative	Service Breakaway Connectors (GM14)	n/a	Service Breakaway Connectors	200	100%	100%	0.001%	1,400	100%	100%	0.007%	1,400	100%	100%	0.007%	3,000	8.2.10.6; p. 226 223
Grid Design, Operations, and Maintenance	Qualitative	Workforce Planning (GM15)	n/a	n/a	Completed; May 1, 2026	n/a	n/a	n/a	Completed; May 1, 2027	n/a	n/a	n/a	Completed; May 1, 2028	n/a	n/a	n/a	n/a	8.8.1; p. 353 350

- (a) In response to Critical Issue RN-PGE-26-06, the percent of risk reduction for detailed inspections and aerial inspections together account for 57% Eyes on Risk (EOR). PG&E aims to achieve a cumulative 57% EOR across aerial scan and detailed inspections. This EOR can be allocated in any way across the two inspections.
- (b) PG&E may include in these calculations the mileage and risk reduction from new system hardening technologies, such as Ground Level Distribution Systems (GLDS) discussed in ACI PG&E 25U 03, Section 2.3.
- (c) In the 2023-2025 WMP, PG&E provided a forecast of 440 undergrounding miles for 2026 (PG&E’s 2023-2025 Base WMP R6, p. 408, Table 8.1.2-2). The 2026 miles were provided as a forecast only to align to the total miles approved in PG&E’s 2023 GRC and were not a WMP target. Based on the undergrounding work completed in 2023 and 2024, and forecast for 2025, we are reducing the number of undergrounding miles needed to achieve the 18% risk reduction target for 2023-2026 that is a requirement of PG&E’s 2023 GRC decision (Decision (D.) 23-11-069, Ordering Paragraph 22).
- (d) In the 2023-2025 WMP, the covered conductor initiative (GH-01) included work associated with the system hardening program, including overhead covered conductor, system hardening undergrounding, and removal of overhead lines in HFTD, HFRA, or buffer zone areas. The covered conductor activity and target GH 12 have been updated for this revised 2026-2028 Base WMP to remove undergrounding work, which is captured in GH-04, and to remove line removal which is captured in GH 14 for line removal enabled by remote grid.
- (e) In response to Critical Issue RN-PGE-26-05, these targets and risk reduction estimates exclude system hardening for community rebuild purposes.

Attachment 3

Table 9-1: Vegetation Management Targets By Year (Non-Inspection Targets)
(in the Revision Notice Response)

Initiative	Quantitative or Qualitative	Activity (Tracking ID)	Previous Tracking ID, if applicable	Target Unit	2026 Target / Status	% Risk Reduction for 2026	2027 Target / Status	% Risk Reduction for 2027	2028 Target / Status	% Risk Reduction for 2028	Three-Year Total	Section; Page Number
Vegetation Management and Inspections	Qualitative	Wood Management Benchmarking (VM-23) ^(a)	n/a	n/a	Initiate benchmarking with peer utilities.	n/a	Gather benchmarking survey responses and facilitate discussions regarding potential alignment on best practices.	n/a	Complete implementation of any relevant updates to PG&E procedure, if applicable.	n/a	n/a	9.5; p. 390 386
Vegetation Management and Inspections	Qualitative	Workforce Planning – Vegetation Management (VM-24) ^(a)	n/a	n/a	Provide funding towards Community College towards recruitment of individuals looking to pursue a VM career path, provide funding for VM-related certifications and memberships, complete annual audit of the completion of VM Training courses.	n/a	Provide funding towards Community College towards recruitment of individuals looking to pursue a VM career path, provide funding for VM-related certifications and memberships, complete annual audit of the completion of VM Training courses.	n/a	Provide funding for VM-related certifications and memberships, complete annual audit of the completion of VM Training courses.	n/a	n/a	9.13; p. 429 425
Vegetation Management and Inspections	Qualitative	Integrated Vegetation Management Benchmarking (VM-25) ^(a)	VM-15	n/a	Initiate benchmarking with peer utilities.	n/a	Gather benchmarking survey responses and facilitate discussions regarding potential alignment on best practices.	n/a	Complete implementation of any relevant updates to PG&E procedure, if applicable.	n/a	n/a	9.7; p. 394 390
Vegetation Management and Inspections	Quantitative	Mitigation of Legacy Tree Removal Inventory (TRI) (VM-26) ^(b)	VM-04	Trees	40,000 (Cumulative)	0.94% (Cumulative)	85,000 (Cumulative)	1.99% (Cumulative)	135,000 (Cumulative)	3.16% (Cumulative)	135,000	9.4 9.2.1 ; p. 388 365

(a) See [Critical Issue RN-PGE-26-08](#) for additional information.

(b) VM 26 is a cumulative target of 135,000 therefore the 85,000 trees shown in 2027 is inclusive of the 40,000 trees from 2026. The risk reduction shown is cumulative as well.

Attachment 4

Table 9-2: Vegetation Inspections And Pole Clearing By Year
(in the Revision Notice Response)

Activity (Program)	Tracking ID	Previous Tracking ID, if applicable	Target Unit	Cumulative (Cml.) Quarterly Target 2026, Q1	Cml. Quarterly Target 2026, Q2	Cml. Quarterly Target 2026, Q3	Cml. Quarterly Target 2026, Q4	Cml. Quarterly Target 2027, Q1	Cml. Quarterly Target 2027, Q2	Cml. Quarterly Target 2027, Q3	Cml. Quarterly Target 2027, Q4	Cml. Quarterly Target 2028, Q1	Cml. Quarterly Target 2028, Q2	Cml. Quarterly Target 2028, Q3	Cml. Quarterly Target 2028, Q4	% HFTD Covered in 2026 ^(d)	% Risk Reduction for 2026	% Risk Reduction for 2027 ^(a)	% Risk Reduction for 2028 ^(a)	Three-Year Total	Activity Timeline Target	Section; Page Number
Pole Clearing Program – Compliance ^(b)	VM-02C	VM-02	Poles ^(c)	13,668	30,958	45,710	45,710	13,668	30,958	45,710	45,710	13,668	30,958	45,710	45,710	4%	0.06%	0.06%	0.06%	137,130	365 days	9.4; p. 388 384
Pole Clearing Program – Risk Reduction ^(b)	VM-02R	VM-02	Poles ^(c)	6,820	16,445	24,290	24,290	6,820	16,445	24,290	24,290	6,820	16,445	24,290	24,290	4%	0.04%	0.04%	0.04%	72,870	365 days	9.4; p. 388 384
Substation Inspections – Distribution	VM-05	VM-05	Distribution Substations	58	122	130	130	58	122	130	130	58	122	130	130	100%	53% (Eyes on Risk)	53% (Eyes on Risk)	53% (Eyes on Risk)	390	274 days	9.6; p. 392 388
Substation Inspections – Transmission	VM-06	VM-06	Transmission Substations	-	53	55	55	-	53	55	55	-	53	55	55	100%	23% (Eyes on Risk)	23% (Eyes on Risk)	23% (Eyes on Risk)	165	274 days	9.6; p. 392 388
Substation Inspections – Power Generation	VM-07	VM-07	Power Generation Switchyards and Powerhouses	-	52	58	58	-	52	58	58	-	52	58	58	100%	24% (Eyes on Risk)	24% (Eyes on Risk)	24% (Eyes on Risk)	174	274 days	9.6; p. 392 388
Routine Transmission – Ground	VM-13	VM-13	Circuit Miles	1,989	10,000	15,000	17,500	1,925	10,000	15,000	17,500	1,925	10,000	15,000	17,500	100%	100% (Eyes on Risk)	100% (Eyes on Risk)	100% (Eyes on Risk)	52,500	365 days	9.2.3; p. 378 374
Transmission Hazard Patrol (Second Patrol, Tree Mortality)	VM-14	VM-14	Circuit Miles	-	-	-	5,625	-	-	-	5,625	-	-	-	5,625	100%	100% (Eyes on Risk)	100% (Eyes on Risk)	100% (Eyes on Risk)	16,875	365 days	9.2.4; p. 383 379
Distribution Routine Patrol ^(e)	VM-16	VM-16	Circuit Miles	11,500	31,500	50,500	78,200	11,500	31,000	50,000	77,800	11,000	31,000	50,000	77,500	100%	0.82% 100% (Eyes on Risk)	0.82% 100% (Eyes on Risk)	0.82% 100% (Eyes on Risk)	233,500	365 days	9.2.1; p. 369 365
Distribution Hazard Patrol (Second Patrol, Tree Mortality)	VM-17	VM-17	Circuit Miles	1,500	4,000	6,500	10,000	1,500	4,000	6,500	10,000	1,500	4,000	6,500	10,000	39%	75.14% (Eyes on Risk)	75.14% (Eyes on Risk)	75.14% (Eyes on Risk)	30,000	365 days	9.2.2; p. 374 370

(a) Estimates for the 2027 & 2028 risk reduction are not available at the time of WMP submission. As such, 2026 risk reduction values will be used as a proxy.

(b) Pole Clearing Program (VM 02) is separated into Pole Clearing Program-Compliance (VM 02C) and Pole Clearing Program – Risk Reduction (VM 02R) in response to Critical Issue RN-PGE-26-10.

(c) Poles are defined in this target as distribution and transmission poles and structures.

(d) Values have been updated as a result of Substantive Errata filing on April 18, 2025, in accordance with Revision Notice at 21. Note that the values for Pole Clearing Program-Compliance and Pole Clearing Program-Risk Reduction have since been updated in response to Critical Issue RN-PGE-26-10.

(e) In response to Critical Issue RN-PGE-26-09, PG&E created a target for Mitigation of Legacy Tree Removal Inventory (TRI) (VM-26). See Table 9-1 for more information on VM-26. Percent Risk Reduction for 2026 – 2028 has been updated to reflect the removal of the VM-26 from Distribution Routine Patrol.

Attachment 5

Table 8-1: Grid Design, Operation, And Maintenance Targets By Year
(in the 2026-2028 Base WMP)

Initiative	Quantitative or Qualitative Target	Activity (Tracking ID #)	Previous Tracking ID (if applicable)	Target Unit	2026 Target / Status	% Planned in HFTD for 2026	% Planned in HFRA for 2026	% Risk Reduction on for 2026	2027 Target / Status	% Planned in HFTD for 2027	% Planned in HFRA in 2027	% Risk Reduction for 2027	2028 Target / Status	% Planned in HFTD for 2028	% HFRA planned in 2028	% Risk Reduction for 2028	Three-Year Total	Section; Page Number
Grid Design, Operations, and Maintenance	Quantitative (Quarterly)	Detailed Inspection – Transmission (AI04)	AI04	Transmission Structures	22,000	96.5%	100%	63.78% (Eyes on Risk)	22,000	96.5%	100%	63.78% (Eyes on Risk)	22,000	96.5%	100%	63.78% (Eyes on Risk)	66,000	8.3.1; p. 232
Grid Design, Operations, and Maintenance	Quantitative (Quarterly)	Infrared Inspections – Transmission (AI06)	AI06	Circuit miles	2,500	94.6%	100%	72.95% (Eyes on Risk)	2,500	94.6%	100%	72.95% (Eyes on Risk)	2,500	94.6%	100%	72.95% (Eyes on Risk)	7,500	8.3.3; p. 235
Grid Design, Operations, and Maintenance	Quantitative (Quarterly)	Aerial Scan Inspections – Distribution (AI07A) ^(a)	n/a	Distribution Poles	50,000	98%	100%	24% (Eyes on Risk)	20,000	99%	100%	12% (Eyes on Risk)	20,000	98%	100%	9% (Eyes on Risk)	90,000	8.3.8 p. 240
Grid Design, Operations, and Maintenance	Quantitative (Quarterly)	Detailed Inspections – Distribution (AI07D) ^(a)	AI07	Distribution Poles	300,000	98%	100%	33% (Eyes on Risk)	305,000	94%	100%	47% (Eyes on Risk)	215,000	98%	100%	48% (Eyes on Risk)	820,000	8.3.8; p. 240
Grid Design, Operations, and Maintenance	Quantitative	System Hardening – Undergrounding (GH04)(b)(e)	GH04	Circuit Miles	360 (c)	100%	100%	1.4%	307	100%	100%	2.2%	400	100%	100%	2.4%	1,067	8.2.2; p. 201
Grid Design, Operations, and Maintenance	Quantitative	System Hardening – Transmission Shunt Splices (GH06)	GH06	Shunt Splices	250	100%	100%	0.07%	250	100%	100%	0.07%	250	100%	100%	0.07%	750	8.2.5.1; p. 208
Grid Design, Operations, and Maintenance	Quantitative	System Hardening – Transmission Conductor Segment Replacement (GH11)	GH11	Conductor Segment	4	100%	100%	0.05%	5	100%	100%	0.05%	6	100%	100%	0.05%	15	8.2.5.1; p. 208
Grid Design, Operations, and Maintenance	Quantitative	Overhead Hardening – Distribution (GH12) ^(e)	GH01 (d)	Circuit Miles	294	100%	100%	1.2%	190	98.7%	100%	1.0%	190	99.90% 99%	100%	0.06% 0.6%	674	8.2.1; p. 184
Grid Design, Operations, and Maintenance	Quantitative	Line Removal Enabled by Remote Grid – Distribution (GH14) ^(e)	GH01	Circuit Miles	4	n/a 100%	100%	0.04%	0	n/a	n/a	n/a	0	n/a	n/a	n/a	4	8.2.7.1; p. 211

**TABLE 8-1:
GRID DESIGN, OPERATION, AND MAINTENANCE TARGETS BY YEAR
(CONTINUED)**

Initiative	Quantitative or Qualitative Target	Activity (Tracking ID #)	Previous Tracking ID (if applicable)	Target Unit	2026 Target / Status	% Planned in HFTD for 2026	% Planned in HFRA for 2026	% Risk Reduction for 2026	2027 Target / Status	% Planned in HFTD for 2027	% Planned in HFRA in 2027	% Risk Reduction for 2027	2028 Target / Status	% Planned in HFTD for 2028	% HFRA planned in 2028	% Risk Reduction for 2028	Three-Year Total	Section; Page Number
Grid Design, Operations, and Maintenance	Qualitative	Proactive Animal Abatement Feasibility Study – Transmission (GH13)	n/a	n/a	Started; March 2026	n/a	n/a	n/a	In Progress; 2027	n/a	n/a	n/a	Completed; December 31, 2028	n/a	n/a	n/a	n/a	8.2.13.1; p. 226
Grid Design, Operations, and Maintenance	Quantitative	Open Tag Reduction – Distribution Backlog (GM03)	GM03	Distribution EC Tags	Close 134% of the count of EC notifications created in HFTD/HFRA in 2025	100%	99%	0.6%	Close 153% of the count of EC notifications created in HFTD/HFRA from 2025 to 2026	100%	99%	0.6%	Close 160% of the count of EC notifications created in HFTD/HFRA from 2025 to 2027	100%	99%	0.6%	n/a	8.6.2; p. 321
Grid Design, Operations, and Maintenance	Qualitative	Updates on EPSS Reliability Study (GM07)	GM07	n/a	Completed; February 15, 2026	n/a	n/a	n/a	Completed; February 15, 2027	n/a	n/a	n/a	Completed; February 15, 2028	n/a	n/a	n/a	n/a	8.7.1.1; p. 332
Grid Design, Operations, and Maintenance	Quantitative	Service Breakaway Connectors (GM14)	n/a	Service Breakaway Connectors	200	100%	100%	0.001%	1,400	100%	100%	0.007%	1,400	100%	100%	0.007%	3,000	8.2.10.6; p. 223
Grid Design, Operations, and Maintenance	Qualitative	Workforce Planning (GM15)	n/a	n/a	Completed; May 1, 2026	n/a	n/a	n/a	Completed; May 1, 2027	n/a	n/a	n/a	Completed; May 1, 2028	n/a	n/a	n/a	n/a	8.8.1; p. 350

- (a) In response to Critical Issue RN-PGE-26-06, the percent of risk reduction for detailed inspections and aerial inspections together account for 57 percent Eyes-on-Risk (EOR). PG&E aims to achieve a cumulative 57 percent EOR across aerial scan and detailed inspections. This EOR can be allocated in any way across the two inspections. See [2026-2028 WMP Revision Notice Response R0](#) for additional information.
- (b) PG&E may include in these calculations the mileage and risk reduction from new system hardening technologies, such as Ground-Level Distribution Systems (GLDS) discussed in ACI PG&E-25U-03, Section 2.3.
- (c) In the 2023-2025 WMP, PG&E provided a forecast of 440 undergrounding miles for 2026 (PG&E's 2023-2025 Base WMP R6, p. 408, Table 8.1.2-2). The 2026 miles were provided as a forecast only to align to the total miles approved in PG&E's 2023 GRC and were not a WMP target. Based on the undergrounding work completed in 2023 and 2024, and forecast for 2025, we are reducing the number of undergrounding miles needed to achieve the 18 percent risk reduction target for 2023-2026 that is a requirement of PG&E's 2023 GRC decision (Decision (D.) 23-11-069, Ordering Paragraph 22)
- (d) In the 2023-2025 WMP, the covered conductor initiative (GH-01) included work associated with the system hardening program, including overhead covered conductor, system hardening undergrounding, and removal of overhead lines in HFTD, HFRA, or buffer zone areas. The covered conductor activity and target GH-12 have been updated for this revised 2026-2028 Base WMP to remove undergrounding work, which is captured in GH-04, and to remove line removal which is captured in GH-14 for line removal enabled by remote grid. See Critical Issue RN-PGE-26-05 in [2026-2028 WMP Revision Notice Response R0](#) for additional information.
- (e) In response to Critical Issue RN-PGE-26-05, these targets and risk reduction estimates exclude system hardening for community rebuild purposes. See [2026-2028 WMP Revision Notice Response R0](#) for additional information.

Attachment 6

**Table PG&E-8.2.1-4: Covered Conductor And Undergrounding Impacts On The Likelihood Of Ignition
(in the 2026-2028 Base WMP)**

Risk Driver	Description	Covered Conductor with Enhanced Powerline Safety Setting and Downed Conductor Detection	Underground Primary	Underground Primary and Secondary Lines and Services (Underground All)
Equipment Failure	Events where failure of a PG&E asset, such as a conductor, arrester, insulator, breaker, transformer, etc., caused an ignition. This includes ignitions caused by wire-to-wire contact, commonly known as line slap.	<p><u>Very High</u>: The likelihood of ignition due to damage or failure of connection device, fuse, lightning arrestor, switch, and transformer</p> <p><u>High</u>: The likelihood of ignition due to damage or failure of anchor/guy, crossarm, insulator and brushing, and pole damage.</p> <p><u>Medium High</u>: The likelihood of ignition due to damage or failure of capacitor bank, recloser, and sectionalizer.</p> <p><u>Medium</u>: The likelihood of ignition due to damage or failure of voltage regulator and secondary damage or failure.</p>	<p><u>All</u>: The likelihood of ignition due to damage or failure of anchor/guy, capacitor bank, connection device, crossarm, fuse, insulator and brushing, lightning arrestor, pole damage, recloser, sectionalizer, switch, transformer, and voltage regulator.</p> <p><u>Very High</u>: The likelihood of ignition due to damage or failure of conductor damage or failure.</p> <p><u>Medium High</u>: The likelihood of ignition due to other equipment or facility failure.</p> <p><u>Medium</u>: The likelihood of ignition due to secondary damage or failure.</p>	<p><u>All</u>: The likelihood of ignition due to damage or failure of anchor/guy, capacitor bank, connection device, crossarm, fuse, insulator and brushing, lightning arrestor, pole damage, recloser, sectionalizer, switch, transformer, voltage regulator, and conductor.</p> <p><u>Medium High</u>: The likelihood of ignition due to other equipment or facility failure.</p> <p><u>All</u>: The likelihood of ignition due to secondary damage or failure.</p>
Vegetation Contact	Events where trees, tree limbs, and other vegetation come in contact with a PG&E asset, resulting in an ignition.	<u>High</u> : Reduces the likelihood of ignition risk due to branch not overhanging, branch overhanging, dead vegetation, vegetation falling into, vegetation growing into, and other vegetation contact.	<u>Very High</u> : The likelihood of ignition risk due to branch not overhanging, branch overhanging, dead vegetation, vegetation falling into, vegetation growing into, and other vegetation contact.	<u>All</u> : The likelihood of ignition risk due to branch not overhanging, branch overhanging, dead vegetation, vegetation falling into, vegetation growing into, and other vegetation contact.

Risk Driver	Description	Covered Conductor with Enhanced Powerline Safety Setting and Downed Conductor Detection	Underground Primary	Underground Primary and Secondary Lines and Services (Underground All)
Contact from Object	Events where objects come into contact with PG&E line equipment and create an ignition. This includes animal/bird contact, mylar balloons, and vehicles.	<u>High</u> : The likelihood of ignition due to animal contact, ballon contact, and vehicle contact. <u>Medium</u> : The likelihood of ignition due to contact from object.	<u>All</u> : The likelihood of ignition due to animal and ballon contact. <u>Very High</u> : The likelihood of an ignition due to vehicle contact. <u>High</u> : The likelihood of ignition due to other contact from object.	<u>All</u> : The likelihood of ignition due to animal contact, ballon contact, and vehicle contact. <u>High</u> : The likelihood of ignition due to other contact from object.
Unable to Determine (Unknown)	Events associated with PG&E assets which led to an ignition, but where PG&E is unable to establish the main driver of the ignition.	<u>High</u> : The likelihood of ignition where PG&E is unable to determine the cause of an ignition.	<u>Very High</u> : The likelihood of an ignition where PG&E is unable to determine the cause of an ignition.	<u>Very High</u> : The likelihood of an ignition where PG&E is unable to determine the cause of an ignition.
Contamination	Events, including ignitions, caused by battery assets and contaminated insulators.	<u>High</u> : The likelihood of ignition due to contamination.	<u>Very High</u> : The likelihood of ignition due to contamination.	<u>All</u> : The likelihood of ignition due to contamination.
Other	Events without known causes.	<u>Medium</u> : The likelihood of ignition due to other causes.	<u>Very High</u> : The likelihood of ignition due to other causes.	<u>Very High</u> : The likelihood of ignition due to other causes.
Wire to Wire Contact	Ignitions caused by wire to wire contact, commonly known as line slap.	<u>Medium</u>: The likelihood of ignition due to wire to wire contact.	<u>Medium</u>: The likelihood of ignition due to wire to wire contact.	<u>All</u>: The likelihood of ignition due to wire to wire contact/contamination.
Utility Work/ Operation	Activities around utility processes.	<u>None</u> : The likelihood of ignition risk from utility work/operation.	<u>None</u> : The likelihood of ignition risk from utility work/operation.	<u>None</u> : The likelihood of ignition risk from utility work/operation.
Vandalism/ Theft	Vandalism from outside parties.	<u>Medium High</u> : The likelihood of ignition risk due to vandalism or theft.	<u>Very High</u> : The likelihood of ignition risk due to vandalism or theft.	<u>All</u> : The likelihood of ignition risk due to vandalism or theft.

Note: Updated based on NonSubstantive Errata filing on May 16, 2025 in accordance with Energy Safety issuance of Revision Notice at 21.

Attachment 7

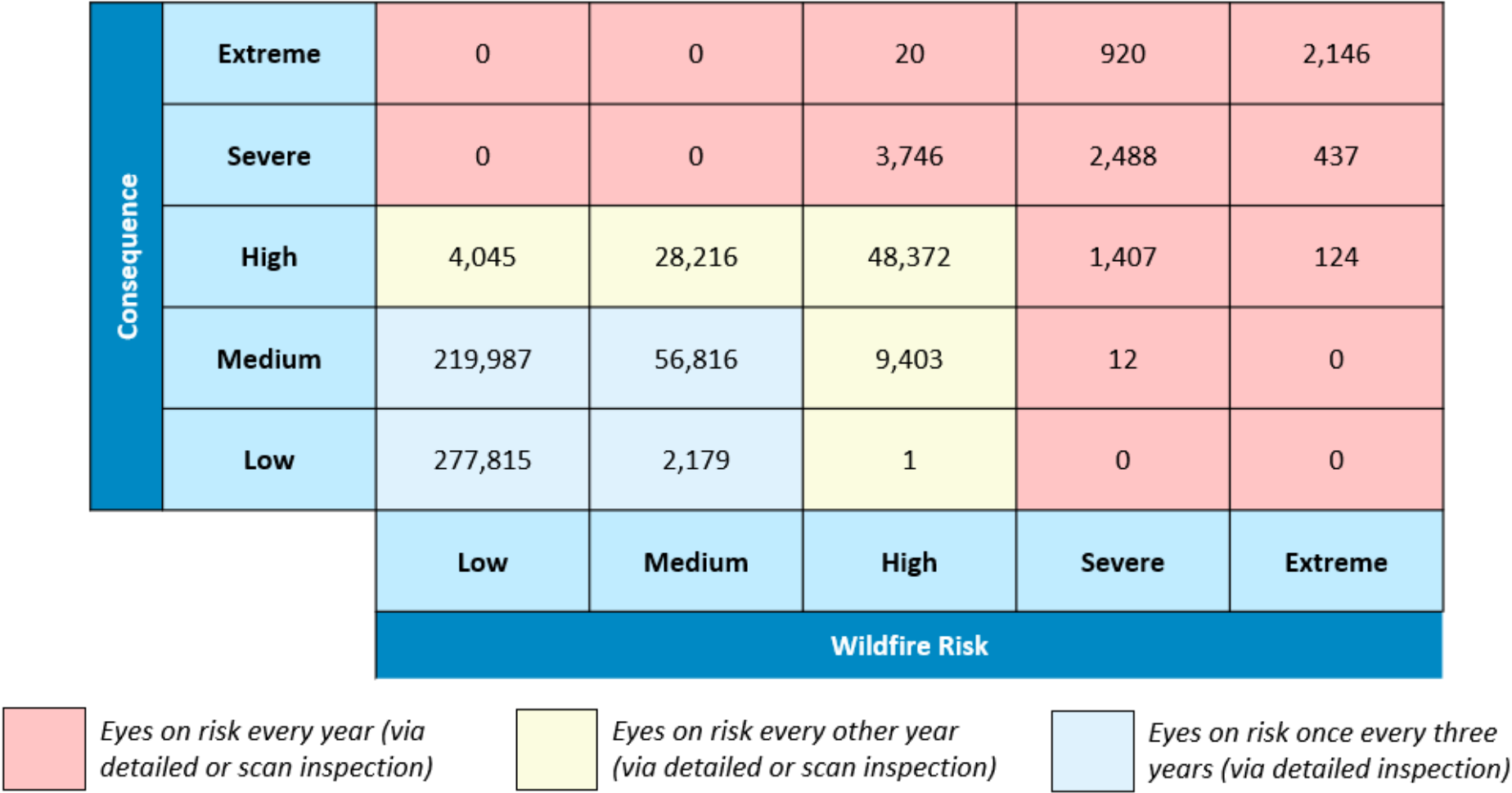
Table PG&E-8.3-1: Asset Inspection Frequency, Method, And Criteria
(in the 2026-2028 Base WMP)

Type	Inspection Activity (Program)	Frequency or Trigger	Method of Inspection	Governing Standards and Operating Procedures ^(f)	% of HFRA and HFTD Covered Annually by Inspection Type	Condition Find Rate Level 1	Condition Find Rate Level 2	Condition Find Rate Level 3
Transmission	Detailed Climbing	3 years	Climbing	GO 165, TD8123P100, TD1001M	25-45% of 500 kV	0%	12.3%	2.4% (Asset)
Transmission	Intrusive Pole ^(a)	10 years by line not to exceed 20 years by structure	Ground/ intrusive inspection	GO 165, TD2325S	5%-25% of wood poles	0.04%	11.3%	0.003% (Asset)
Transmission	Switch Function Tests ^(b)	8 years	Detailed Aerial with some function tests as triggered	GO 165, TD1006P02, TD1001M	1245%	0.6%	17%	0.5% (Asset)
Transmission	Patrol ^(c)	Every year not inspected by Detailed Inspection Program	Aerial or ground	GO 165, TD8123P100, TD1001M	55-75% ^(d)	0.05%	0.18%	0.03% (Asset)
Transmission	Conductor Measurement	TBD – Pilot	LineVue robotic device	NA – Pilot	NA – Pilot	NA – Pilot	NA – Pilot	NA – Pilot
Transmission	Proactive Sampling/Testing	TBD – Pilot	Laboratory or field analysis	NA – Pilot	NA – Pilot	NA – Pilot	NA – Pilot	NA – Pilot
Distribution	Ground Patrol	WDRM V4	Visual	TD8123S	~67%	0.035%	0.07%	0.003%
Distribution	IR Inspection	As needed to investigate emerging issues	Infrared	TD2022P01	N/A	(per circuit-mile inspected) 0	(per circuit-mile inspected) 0.53	(per circuit-mile inspected) 0
Distribution	Intrusive Pole Inspections	Approximately 10 or 20 year cycle ^(c)	Ground/hole-boring	TD2325S & TD2325P01	N/A	0.084%	4.0%	0.58%
Distribution	LiDAR-Based Pole Loading Assessments	First time analysis – does not have a recurring frequency	Helicopter and vehicle	N/A	N/A	N/A	N/A	N/A
Distribution	Overhead Equipment Inspections	Annually	Ground visual	TD2302P05	100%	N/A	N/A	N/A
Distribution	Aerial Pilot	WDRM v3	Visual by aerial	Electric Distribution Preventive Maintenance (EDPM) Manual, TD8123M	100% over 3-year cycle	0.40%	35.9%	0.65%
Substation	Aerial (drone) Inspection	3-years or in-year based on risk	Aerial	TD3322S	100% over 3-year cycle	See Table PG&E8.315.11	See Table PG&E8.315.11	See Table PG&E8.315.11

- (a) Method only applicable to wood poles. Inspection scope is regionally-optimized, leading to variable HFTD/HFRA coverage.
- (b) Find Rate listed is for function tests. See Detailed Inspection for visual find rate.
- (c) May change depending on yearly detailed inspection scope. Percent HFRA and HFTD covered by patrols in 100 percent with the inclusion of detailed inspections.
- (d) Annual coverage of HFRA and HFTD is 100 percent, when combined with Transmission Detailed Inspections.
- (e) PG&E plans to return to a 10year PT&T cycle beginning in 2027.
- (f) Governing standards are available in Appendix E. Operating Procedures are available at: [PG&E's Community Wildfire Safety Program](#).

Attachment 8

Figure PG&E-8.3.8.2-1: Inspection Selection Process
(in the 2026-2028 Base WMP)



Attachment 9

Table 9-1: Vegetation Management Targets By Year (Non-Inspection Targets)
(in the 2026-2028 Base WMP)

Initiative	Quantitative or Qualitative	Activity (Tracking ID)	Previous Tracking ID, if applicable	Target Unit	2026 Target / Status	% Risk Reduction for 2026	2027 Target / Status	% Risk Reduction for 2027	2028 Target / Status	% Risk Reduction for 2028	Three-Year Total	Section; Page Number
Vegetation Management and Inspections	Qualitative	Wood Management Benchmarking (VM-23) ^(a)	n/a	n/a	Initiate benchmarking with peer utilities.	n/a	Gather benchmarking survey responses and facilitate discussions regarding potential alignment on best practices.	n/a	Complete implementation of any relevant updates to PG&E procedure, if applicable.	n/a	n/a	9.5; p. 386
Vegetation Management and Inspections	Qualitative	Workforce Planning – Vegetation Management (VM-24) ^(a)	n/a	n/a	Provide funding towards Community College towards recruitment of individuals looking to pursue a VM career path, provide funding for VM-related certifications and memberships, complete annual audit of the completion of VM Training courses.	n/a	Provide funding towards Community College towards recruitment of individuals looking to pursue a VM career path, provide funding for VM-related certifications and memberships, complete annual audit of the completion of VM Training courses.	n/a	Provide funding for VM-related certifications and memberships, complete annual audit of the completion of VM Training courses.	n/a	n/a	9.13; p. 425
Vegetation Management and Inspections	Qualitative	Integrated Vegetation Management Benchmarking (VM-25) ^(a)	VM-15	n/a	Initiate benchmarking with peer utilities.	n/a	Gather benchmarking survey responses and facilitate discussions regarding potential alignment on best practices.	n/a	Complete implementation of any relevant updates to PG&E procedure, if applicable.	n/a	n/a	9.7; p. 390
Vegetation Management and Inspections	Quantitative	Mitigation of Legacy Tree Removal Inventory (TRI) (VM-26) ^(b)	VM-04	Trees	40,000 (Cumulative)	0.94% (Cumulative)	85,000 (Cumulative)	1.99% (Cumulative)	135,000 (Cumulative)	3.16% (Cumulative)	135,000	9.4 9.2.1; p. 384 364 365

(a) See 2026-2028 WMP Revision Notice Response R0, Critical Issue RN-PGE-26-08 for additional information.

(b) VM-26 is a cumulative target of 135,000; therefore, the 85,000 trees shown in 2027 is inclusive of the 40,000 trees from 2026. The risk reduction shown is cumulative as well. See 2026-2028 WMP Revision Notice Response R0, Critical Issue RN-PGE-26-09 for additional information.

Attachment 10

Table 9-2: Vegetation Inspections And Pole Clearing By Year
(in the 2026-2028 Base WMP)

Activity (Program)	Tracking ID	Previous Tracking ID, if applicable	Target Unit	Cumulative (Cml.) Quarterly Target 2026, Q1	Cml. Quarterly Target 2026, Q2	Cml. Quarterly Target 2026, Q3	Cml. Quarterly Target 2026, Q4	Cml. Quarterly Target 2027, Q1	Cml. Quarterly Target 2027, Q2	Cml. Quarterly Target 2027, Q3	Cml. Quarterly Target 2027, Q4	Cml. Quarterly Target 2028, Q1	Cml. Quarterly Target 2028, Q2	Cml. Quarterly Target 2028, Q3	Cml. Quarterly Target 2028, Q4	% HFTD Covered in 2026	% Risk Reduction for 2026	% Risk Reduction for 2027(a)	% Risk Reduction for 2028(a)	3-Year Total	Activity Timeline Target	Section; Page Number
Pole Clearing Program – Compliance(b)	VM-02C	VM-02	Poles(c)	13,668	30,958	45,710	45,710	13,668	30,958	45,710	45,710	13,668	30,958	45,710	45,710	4%	0.06%	0.06%	0.06%	137,130	365 days	9.4 ; p. 384
Pole Clearing Program – Risk Reduction(b)	VM-02R	VM-02	Poles(c)	6,820	16,445	24,290	24,290	6,820	16,445	24,290	24,290	6,820	16,445	24,290	24,290	4%	0.04%	0.04%	0.04%	72,870	365 days	9.4 ; p. 384
Substation Inspections – Distribution	VM-05	VM-05	Distribution Substations	58	122	130	130	58	122	130	130	58	122	130	130	100.00%	53% (Eyes on Risk)	53% (Eyes on Risk)	53% (Eyes on Risk)	390	274 days	9.6 ; p. 388
Substation Inspections – Transmission	VM-06	VM-06	Transmission Substations	–	53	55	55	–	53	55	55	–	53	55	55	100.00%	23% (Eyes on Risk)	23% (Eyes on Risk)	23% (Eyes on Risk)	165	274 days	9.6 ; p. 388
Substation Inspections – Power Generation	VM-07	VM-07	Power Generation Switchyards and Powerhouses	–	52	58	58	–	52	58	58	–	52	58	58	100.00%	24% (Eyes on Risk)	24% (Eyes on Risk)	24% (Eyes on Risk)	174	274 days	9.6 ; p. 388
Routine Transmission – Ground	VM-13	VM-13	Circuit Miles	1,989	10,000	15,000	17,500	1,925	10,000	15,000	17,500	1,925	10,000	15,000	17,500	100.00%	100% (Eyes on Risk)	100% (Eyes on Risk)	100% (Eyes on Risk)	52,500	365 days	9.2.3 ; p. 374 374
Transmission Hazard Patrol (Second Patrol, Tree Mortality)	VM-14	VM-14	Circuit Miles	–	–	–	5,625	–	–	–	5,625	–	–	–	5,625	100.00%	100% (Eyes on Risk)	100% (Eyes on Risk)	100% (Eyes on Risk)	16,875	365 days	9.2.4 ; p. 379
Distribution Routine Patrol(e)	VM-16	VM-16	Circuit Miles	11,500	31,500	50,500	78,200	11,500	31,000	50,000	77,800	11,000	31,000	50,000	77,500	100.00%	100% (Eyes on Risk)	100% (Eyes on Risk)	100% (Eyes on Risk)	233,500	365 days	9.2.1 ; p. 365
Distribution Hazard Patrol (Second Patrol, Tree Mortality)	VM-17	VM-17	Circuit Miles	1,500	4,000	6,500	10,000	1,500	4,000	6,500	10,000	1,500	4,000	6,500	10,000	100.00% 39%	75.14% (Eyes on Risk)	75.14% (Eyes on Risk)	75.14% (Eyes on Risk)	30,000	365 days	9.2.2 ; p. 370

(a) Estimates for the 2027 & 2028 risk reduction are not available at the time of WMP submission. As such, 2026 risk reduction values will be used as a proxy.

(b) Pole Clearing Program (VM-02) is separated into Pole Clearing Program – Compliance (VM-02C) and Pole Clearing Program – Risk Reduction (VM-02R) in response to Critical Issue RN-PGE-26-10. [See 2026-2028 WMP Revision Notice Response R0](#) for additional information.

(c) Poles are defined in this target as distribution and transmission poles and structures.

(d) Values have been updated as a result of Substantive Errata filing on April 18, 2025, in accordance with Revision Notice, ~~Section 4~~ [at 21](#). Note that the values for Pole Clearing Program – Compliance and Pole Clearing Program – Risk Reduction have since been updated in response to Revision Notice Critical Issue RN-PGE-26-10.

(e) In response to Critical Issue RN-PGE-26-09, PG&E created a target for Mitigation of ~~Legal~~ **Legacy** Tree Removal Inventory (TRI) (VM-26). See Table 9-1 for more information on VM-26. Percent Risk Reduction for 2026-2028 has been updated to reflect the removal of the VM-26 from Distribution Routine Patrol. See [2026-2028 WMP Revision Notice Response R0](#) for more information.

Attachment 11

Figure PG&E-9.2.2.1-1: Inspection Selection Matrix
(in the 2026-2028 Base WMP)

Eyes on Risk ⁽³⁾ Selection Process						
Unit: Number of miles						
Consequence ⁽¹⁾	Extreme	7	24	70	3	61
	Severe	33	84	147	37	23
	High	631	1,061	1,447	221	96
	Medium	2,395	1,344	1,013	86	20
	Low	13,875	1,704	432	4	1
		Low	Medium	High	Severe	Extreme
Wildfire Risk ⁽²⁾						

Routine/Hazard/
Remote Sensing Routine/Hazard Routine

Note(s):

(1) Groupings for consequence are based on the percentiles of circuit segments in the following categories: Extreme 0-1%, Severe 1-2%, High 2-10%, Medium 10-20%, Low 20-100%. Mileage shown in the table is as of January 2025 and is subject to change.

(2) Groupings for wildfire risk are based on the percentiles of circuit segments in the following categories: Extreme 0-1%, Severe 1-2%, High 2-10%, Medium 10-20%, Low 20-100%. Mileage shown in the table is as of January 2025 and is subject to change.

(3) (3)(2)(1)“Eyes on risk” demonstrates the anticipated average “eyes on risk” value per year and may fluctuate per year depending on changes in overhead circuit milage.

Attachment 12

Table 10-1: Situational Awareness Targets By Year

Initiative	Quantitative or Qualitative Target	Activity (Tracking ID #)	Previous Tracking ID, if Applicable	Target Unit	2026 End-of-Year Total/ Completion Date	% Risk Reduction for 2026	2027 Total/ Status	% Risk Reduction for 2027 ^(a)	2028 Total/ Status	% Risk Reduction for 2028 ^(a)	3-Year Total	Section; Page Number
Situational Awareness and Forecasting	Quantitative	Line Sensor - Installations (SA-02)	SA-02	Sensor Locations	240	6.42% (Eyes on Risk)	240	6.42% (Eyes on Risk)	240	6.42% (Eyes on Risk)	720	10.3.1 ; p. 447
Situational Awareness and Forecasting	Qualitative	Evaluate camera AI system performance and new functionalities (SA-08)	SA-08	n/a	Completed; December 31, 2026	n/a	n/a	n/a	n/a	n/a	n/a	10.4.1 ; p. 455 454
Situational Awareness and Forecasting	Quantitative	Distribution Fault Anticipation (DFA) Installations (SA-10)	SA-10	Sensor Locations	15	9.92% (Eyes on Risk)	15	9.92% (Eyes on Risk)	15	9.92% (Eyes on Risk)	45	10.3.1 ; p. 447
Situational Awareness and Forecasting	Quantitative	Early Fault Detection (EFD) Installations (SA-11)	SA-11	Sensor Locations	180	2.52% (Eyes on Risk)	180	2.52% (Eyes on Risk)	180	2.52% (Eyes on Risk)	540	10.3.1 ; p. 447
Situational Awareness and Forecasting	Quantitative	Live Fuel Moisture Data Collection (SA-12)	n/a	Sample Locations	25	n/a	25	n/a	25	n/a	75	10.2.1 ; p. 437 10.2.4 ; p. 446
Situational Awareness and Forecasting	Qualitative	Weather Station Network Evaluation (SA-13)	n/a	n/a	Completed; December 31, 2026	n/a	Completed; December 31, 2027	n/a	Completed; December 31, 2028	n/a	n/a	10.2.1 ; p. 437 10.2.4 ; p. 446
Situational Awareness and Forecasting	Qualitative	SmartMeters next generation capability evaluation (SA-14)	n/a	n/a	Started; March 2026	n/a	In Progress; 2027	n/a	Completed; December 31, 2028	n/a	n/a	10.3.3 ; p. 452
Situational Awareness and Forecasting	Quantitative	Weekly uptime of Wildfire Cameras (SA-15)	n/a	Average weekly uptime percentage	90%	n/a	90%	n/a	90%	n/a	n/a	10.4.1 ; p. 455 454
Situational Awareness and Forecasting	Quantitative	Weather Model Verification Tool (SA-16)	n/a	Weather Model Verification Tool	1	n/a	n/a	n/a	n/a	n/a	1	10.5.3 ; p. 468 467
Situational Awareness and Forecasting	Qualitative	Weather Model Enhancements leveraging AI- ML (Machine Learning) (SA-17)	n/a	n/a	Started; March 2026	n/a	In Progress; 2027	n/a	Completed; December 31, 2028	n/a	n/a	10.5.3 ; p. 468 467
Situational Awareness and Forecasting	Quantitative	Weather Station Network Health (SA-18)	n/a	Percent of Weather Stations	95%	n/a	95%	n/a	95%	n/a	n/a	10.5.5 ; p. 469 468
Situational Awareness and Forecasting	Qualitative	Weather Station Network Optimization (SA-19)	n/a	n/a	Completed; December 31, 2026	n/a	Completed; December 31, 2027	n/a	Completed; December 31, 2028	n/a	n/a	10.5.5 ; p. 469 468

Note: Estimates for the 2027 and 2028 risk reduction are not available at the time of WMP submission. As such, 2026 risk reduction values will be used as a proxy.

Attachment 13

Table 11-1: Emergency Preparedness And Community Outreach Targets By Year
(in the 2026-2028 Base WMP)

Initiative	Activity (Tracking ID #)	Previous Tracking ID, if Applicable	2026 End of Year Total/Completion Date	2027 Status	2028 Status	Section; Page Number
Public Communication, Outreach, and Education Awareness	Outreach to HFRA Infrastructure Customers (CO-04)	CO-04	Completed; September 30, 2026	Completed; September 30, 2027	Completed; September 30, 2028	11.4 ; p. 512 510
Public Communication, Outreach, and Education Awareness	Outage Preparedness Campaign (CO-05)	CO-05	Completed; September 30, 2026	Completed; September 30, 2027	Completed; September 30, 2028	11.4 ; p. 512 510
Emergency Preparedness and Recovery Plan	Common Operating Picture (COP) Technology (EP-07)	EP-07	Started; March 2026	In Progress; December 31, 2027	Completed; December 31, 2028	11.2 ; p. 486 485
External Collaboration and Coordination	Continue sharing PSPS lessons learned (PS-10)	PS-10	Completed; December 31, 2026	Completed; December 31, 2027	Completed; December 31, 2028	11.3 ; p. 501 499
Customer Support in Wildfire and PSPS Emergencies	Access and Functional Needs (AFN) Customer Support During PSPS Emergencies (PS-12)	N/A	Started; April 2026	In Progress; 2027	Completed; December 31, 2028	11.5 ; p. 537 534

Attachment 14

Table 12-1: Enterprise Systems Targets
(in the 2026-2028 Base WMP)

Initiative	Activity (Tracking ID #)	Previous Tracking ID (if Applicable)	2026 End-of-Year Total/Completion Date	2027 Total/Status	2028 Total/Status	Section; Page Number
Enterprise System – Vegetation Management	VM Critical Datasets Data Quality Remediation (ES-01)	n/a	Started; January 2026 ^(a)	In Progress; 2027 ^(a)	Completed; December 31, 2028 ^(a)	12.1.1 ; p. 544 542
Enterprise System – Asset Management and Inspection	Evaluate and create new methods(s) to improve the Accuracy of Asset Inventory Data (ES-02)	n/a	Started; March 2026	In Progress; 2027	Completed; December 31, 2028	12.1.1 ; p. 544 542
Enterprise System – Grid Monitoring	Grid Monitoring Sensor Systems Efficacy Assessment (ES-03)	n/a	Started; March 2026	In Progress; 2027	Completed; December 31, 2028	12.1.1 ; p. 544 542
Enterprise System – Weather Forecasting	Participate in Company Disaster Recovery Exercise (ES-04)	n/a	Completed; December 31, 2026	n/a	n/a	12.1.1 ; p. 544 542
Enterprise System – Risk Assessment	Integration of continuous grid monitoring technologies (ES-05)	n/a	Started; March 2026	In Progress; 2027	Completed; December 31, 2028	12.1.1 ; p. 544 542
<hr/> ^(a) See 2026-2028 WMP Revision Notice Response R0 , Critical Issue response RN-PGE-26-08 for additional information.						

Attachment 15

**Table 13-2: Lessons Learned From Discontinued Activities
(in the 2026-2028 Base WMP)**

Discontinued Activity (Tracking ID)	Rationale for Discontinuation	Lessons Learned	Replacement Activities (Include Page Number Where Discussed)
Transmission – Ground Detailed Inspection Program (AI-02) and Transmission – Aerial Detail Inspection (AI-04)	Programs are being combined based on visual aspects of both programs. The program is now known as Transmission – Detailed Inspection Program.	Combining Ground and Aerial programs into one target allows for flexibility to address wildfire risk by method choice to best suit location and structure type.	Transmission – Detailed Inspection Program Section 8.3.1 ; p. 232
Transmission Climbing Detailed Inspection Program (AI-05)	This program will still continue, but not under a WMP target.	Climbing program focuses on 500 kV steel structure integrity which is not a common source of ignition.	Transmission – Detailed Climbing Inspection Program Section 8.3.2 ; p. 234
Substation Supplemental Inspections (removal of ground and infrared inspections and continuing aerial drone inspections as a part of routine inspections) (Formerly AI-08, AI-09, and AI-10)	The WMP substation supplemental inspection program was originally developed to focus on ignition risks independent from existing routine substation inspections. A comparative analysis of supplemental and routine inspections was completed in 2023 and 2024. This analysis confirmed redundancy and equal effectiveness of two of the three methods—ground and infrared inspection. Furthermore, substation routine ground inspections are performed more frequently, monthly or bi-monthly, in comparison to the annual supplemental inspection. PG&E proposes to streamline substation inspections by removing duplicative ground	PG&E originally planned supplemental inspection targets by requiring three separate methods for each single supplemental inspection: ground, infrared, and aerial. The 2026-2028 WMP will continue with drone-based aerial inspections as a part of the ongoing routine inspection process but will remove the duplicative ground and infrared supplemental inspection methods. This proposed change is expected to yield equivalent ignition risk detectability while streamlining the inspections programs to be more efficient.	Substation Drone Inspection Program Section 8.3.15 ; p. 258

**TABLE 13-2:
LESSONS LEARNED FROM DISCONTINUED ACTIVITIES
(CONTINUED)**

Discontinued Activity (Tracking ID)	Rationale for Discontinuation	Lessons Learned	Replacement Activities (Include Page Number Where Discussed)
	and infrared inspections, while retaining drone-based aerial inspections as a part of the routine inspections process. The drone-based aerial inspection provides unique risk detection perspectives not captured from the ground and infrared methods. The routine substation inspection program will continue to provide ground and infrared inspections to substations pursuant to GO 174. Power Generation Switchyards are regulated either by GO 167, or Federal Energy Regulatory Commission (FERC) in situations where operations are under a FERC license. These regulatory commitments focus on maintenance and operations requirements, and do not identify an inspection requirement. Power Generation performs routine inspections of switchyards in alignment with substation routine inspection program.		
Filling Asset Inventory Data Gaps (AI-11)	AI-11 has been replaced by ES-02.	This activity will continue under ES-02, which is described in Section 12.1.1 .	Evaluate and create new method(s) to improve the accuracy of asset inventory data (ES-02) Section 12.1.1 ; p. 544 542
Community Engagement - Meetings (CO-01)	This activity is being reported on externally in other forums.	PG&E will incorporate this activity into Section 11.4.3 .	Section 11.4.3 ; p. 520 518
Community Engagement - Surveys (CO-02)	This activity is being reported on externally in other forums.	PG&E will incorporate this activity into Section 11.4.3 .	Section 11.4.3 ; p. 520 518
Complete PSPS and Wildfire Tabletop and Functional Exercises (EP-01).	This activity is being reported on externally in other forums.	This Emergency Preparedness program addresses hazards beyond wildfires and we have worked to ensure wildfire related activities are included within these processes.	N/A
Maintain all hazards planning and preparedness program in 2023-2025 (EP-02)	This activity is being reported on externally in other forums.	This Emergency Preparedness program addresses hazards beyond wildfires and we have worked to ensure wildfire related activities are included within these processes.	N/A
Expand all hazards planning to include additional threats and scenarios in 2023-2025 (EP-04)	This activity is being reported on externally in other forums.	This Emergency Preparedness program addresses hazards beyond wildfires and we have worked to ensure wildfire related activities are included within these processes.	N/A

**TABLE 13-2:
LESSONS LEARNED FROM DISCONTINUED ACTIVITIES
(CONTINUED)**

Discontinued Activity (Tracking ID)	Rationale for Discontinuation	Lessons Learned	Replacement Activities (Include Page Number Where Discussed)
Annually review of CERP and the two wildfire related annexes (EP-06)	This activity is being reported on externally in other forums.	This Emergency Preparedness program addresses hazards beyond wildfires and we have worked to ensure wildfire related activities are included within these processes.	N/A
Threats and Hazards Identification and Risk Assessment (THIRA) updates executive briefings (EP-08)	This activity is being reported on externally in other forums.	The THIRA is an all-hazard identification beyond just wildfires and we have worked to ensure wildfire related activities are included in these processes.	N/A
System Hardening – Distribution (GH-01) ^(a)	Revised Overhead Hardening Distribution Target (GH-12) and new Line Removal Enabled by Remote Grid Target (GH-14).	This activity has been incorporated into GH-12, which is described in Section 8.2.1 . and GH-14, described in Section 8.2.7.1 .	Covered Conductor Installation Section 8.2.1 ; p. 184 Remote Grids Section 8.2.7.1 , p. 211
Reduce PSPS impacts to customer events (PS-07)	PG&E will continue this work, but not under a WMP target.	Significant progress made during the 2023-2025 WMP cycle to reduce PSPS impacts to customers.	N/A
Artificial Intelligence in Wildfire Cameras (SA-01)	SA-01 is continued under SA-08.	PG&E will incorporate this activity under SA-08 described in Section 10.4.1 .	Existing Ignition Detection Sensors and Systems Section 10.4.1 ; p. 455 454
LiDAR Data Collection – Transmission (VM-01)	We will continue to improve remote sensing with LiDAR and Satellite technologies.	<ul style="list-style-type: none"> LiDAR tree analytics capture risk in the system. Inspectors use LiDAR analytics for all spans in Transmission. We are evaluating the use of satellite or spaceborne data for Transmission. 	Satellite technology evaluation in progress Section 9.2 ; p. 363
Focused Tree Inspections (FTI) (VM-03)	Component(s) of the initiative will be incorporated into the Distribution Routine Patrol Program.	PG&E is still in the process of evaluating which component(s) of the FTI scope may be incorporated into the Distribution Routine Patrol program. This analysis will be based on findings from efficacy studies planned to be performed in 2025.	Distribution Routine Patrol Section 9.2.1 ; p. 365
Tree Removal Inventory (TRI) (VM-04) ^(b)	Revised to Mitigation of Legacy Tree Removal Inventory (TRI) (VM-26).	In the proposed consolidated program structure, the process of what was the legacy TRI Program will occur during the distribution routine programs. See VM-26.	Distribution Routine Patrol Section 9.2.1 ; p. 440 365

**TABLE 13-2:
LESSONS LEARNED FROM DISCONTINUED ACTIVITIES
(CONTINUED)**

Discontinued Activity (Tracking ID)	Rationale for Discontinuation	Lessons Learned	Replacement Activities (Include Page Number Where Discussed)
Evaluate emerging technologies (VM-12)	This work will continue, but not under WMP target.	VM is evaluating emerging technologies as it pertains to individual programs. For example, VM distribution inspections is reviewing remote sensing technology for potential incorporation into this program's process.	Distribution Routine Patrol Section 9.2.1 ; p. 440 365
Vegetation Management for Operational Mitigations (VMOM) (VM-18)	Component(s) of the initiative will be incorporated into Activities Based on Weather Conditions	PG&E will incorporate VMOM into activities described in Section 9.9.1 .	Activities Based on Weather Conditions Section 9.9.1 ; p. 410
Smart Tape (N/A)	<p>PG&E funded a lab-only proof of concept in 2022-2023 using the EPSS Emergent Technology expense budget to evaluate the feasibility of using “smart tape” technology for rapid fault location on EPSS-enabled lines. The proof of concept was structured in three phases. PG&E decided to conclude the project at the end of Phase II, due to the following findings:</p> <ol style="list-style-type: none"> 1) The vendor had not demonstrated sufficiently rapid product development progress in line with PG&E's needs. 2) The proposed equipment design had moved away from initial “smart tape” concept to a larger, bulkier design that no longer held unique value proposition compared to other market-available sensors 3) The proposed design was not compatible with PG&E's desire for cost-effectiveness at scale. 	This effort validated the use of a phased approach with clear exit clauses when evaluating solutions with low technology readiness levels. This type of phased approach allows PG&E to engage with technology vendors iterating on early prototypes while managing the inherent risks of early-stage technology. PG&E's contract structure and overall approach with the “smart tape” vendor has provided a model for other engagements involving low technology readiness levels.	<p>Real-time monitoring for wildfire risk reduction, including, but not limited to Gridscope.</p> <p>For more information on Gridscope, see Section 8.7.1.3.2; p. 344</p>
<p>(a) See 2026-2028 WMP Revision Notice Response R0, Critical Issue RN-PGE-26-04 for additional information.</p> <p>(b) See 2026-2028 WMP Revision Notice Response R0, Critical Issue RN-PGE-26-09 for additional information.</p>			