
PACIFIC GAS AND ELECTRIC COMPANY

**ANNUAL IMPLEMENTATION REPORT
FOR 2025 WILDFIRE MITIGATION PLAN**

APRIL 1, 2026

Pacific Gas and Electric Company Annual Implementation Report for 2025 Wildfire Mitigation Plan

Consistent with the Office of Energy Infrastructure Safety's (Energy Safety) *Performance Guidelines* (Guidelines) issued on December 12, 2025, and California Public Utilities Code Section 8386.3(b), Pacific Gas and Electric Company (PG&E) submits this Annual Implementation Report for our 2025 Wildfire Mitigation Plan (WMP). Energy Safety approved our 2023-2025 WMP on December 29, 2023, and on February 15, 2024, the California Public Utilities Commission (CPUC) ratified Energy Safety's approval. We submitted our 2025 WMP Update on April 2, 2024. Energy Safety issued a decision on November 19, 2024, approving our 2025 WMP Update and on January 16, 2025, CPUC ratified Energy Safety's approval.

I. EXECUTIVE SUMMARY

PG&E successfully delivered on our 2025 Wildfire Mitigation Plan (WMP), providing meaningful benefits to our customers and the communities we serve. Through disciplined execution, we implemented our planned initiatives, achieved our stated objectives and targets, and continued to reduce wildfire risk across our service territory.

We are proud of the mitigation work completed in 2025. California's climate continues to shift toward more severe wind events, prolonged periods of intense precipitation, and increasingly hot and dry conditions. This hydroclimate "whiplash" accelerates vegetation growth during wet periods and transforms this growth into highly combustible fuel during dry periods, significantly increasing wildfire exposure. These rapidly evolving conditions amplify both wildfire and reliability risks and underscore the need for more targeted, scalable, and adaptive mitigations.

PG&E remains committed to continuously monitoring risk exposure, assessing emerging threats, and maintaining a proactive, data-driven approach to wildfire mitigation. Despite adverse environmental conditions, we successfully executed our planned initiatives and delivered results aligned with our wildfire safety commitments.

Our 2025 WMP consists of initiatives that include both Targets and Objectives¹ and are structured around three strategic goals:

1. Reducing the potential for catastrophic wildfires
2. Reducing the potential for fires to spread
3. Limiting customer impacts from Enhanced Powerline Safety Settings (EPSS) and Public Safety Power Shutoff (PSPS) events

¹ Please note that the total number of initiatives identified in PG&E's 2023-2025 WMP was 83. This larger number includes initiatives that did not have 2025 completion dates, such as: (1) 15 ten-year objectives; (2) 9 three-year objectives with no compliance milestones in 2025; and (3) 4 targets that did not have external commitments in 2025.

These goals align with PG&E's stand that catastrophic wildfires shall stop.

Throughout 2025, we advanced this mission by launching new programs and strengthening existing initiatives designed to reduce wildfire likelihood and consequence. As a result of these comprehensive efforts, PG&E met or exceeded the targets and objectives established for our 2025 WMP initiatives.

Highlights of our completed WMP commitments include:

- Completing more than 530 miles of system hardening, including over 200 miles of covered conductor and more than 330 miles of underground powerlines.
- Completing more than 279,000 inspections on distribution, transmission, and substation assets.
- Closing more than 125,000 tags, which included over 65,000 backlog distribution tags.
- Providing more than 2,100 portable and 1,600 permanent batteries to customers at risk of outages associated with Public Safety Power Shutoffs and Enhanced Powerline Safety Settings.
- Completing more than 78,000 miles of distribution line vegetation management inspections and working more than 1.3 million trees.

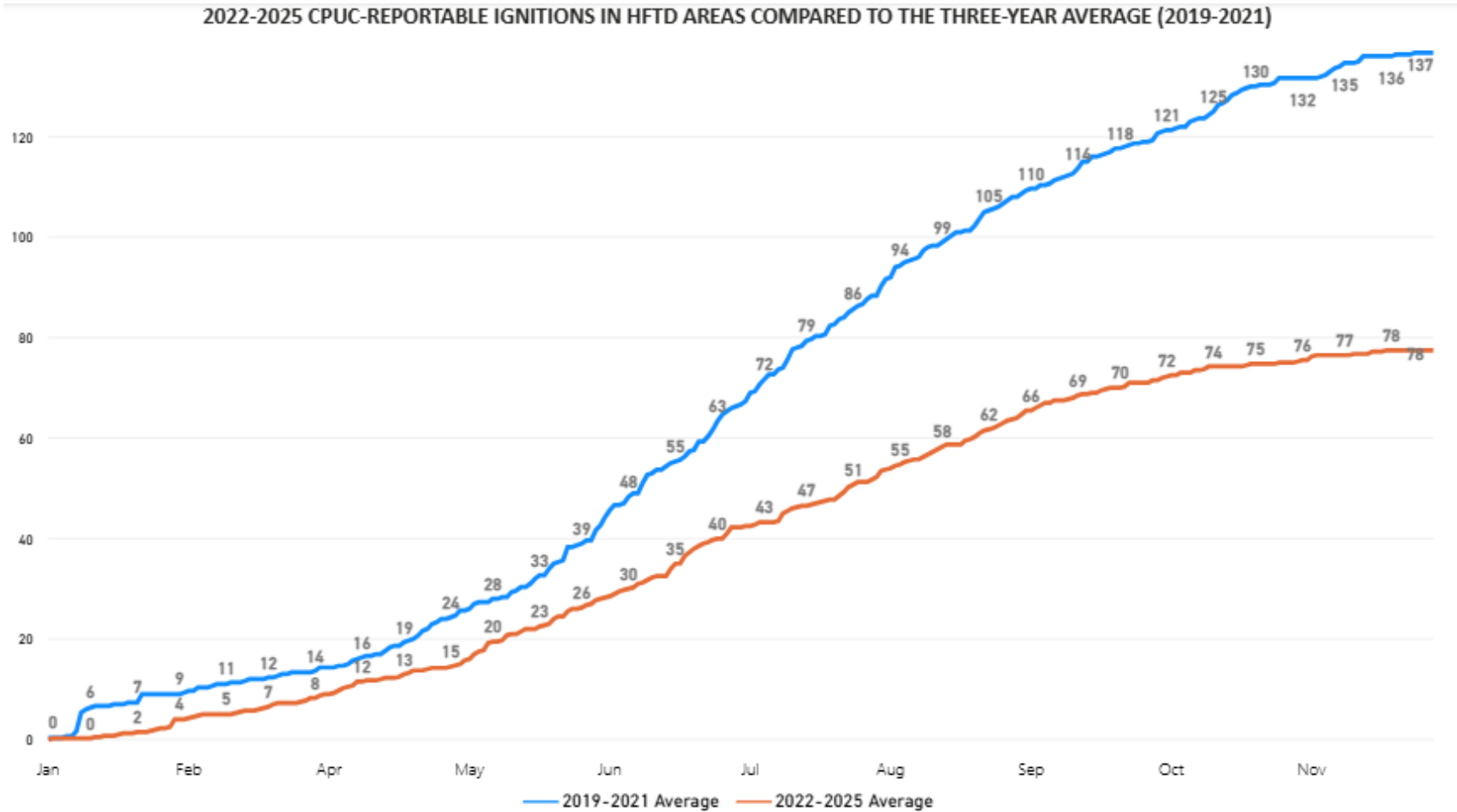
By carrying out our 2025 WMP initiatives, we achieved our goals and significantly reduced wildfire risk. We are seeing the results of our efforts.

There were no catastrophic fires associated with PG&E facilities in 2025, and we saw a total of 57 CPUC-reportable ignitions in High Fire Threat Districts (HFTD) – the fewest ignitions in HFTD compared to all other years on record.² There was only one ignition that was 10 or more acres in HFTD in 2025 compared to 11 in 2024 and 4 in 2023. Compared to the 3-year period before full implementation of EPSS, we saw an approximate 58 percent reduction in ignitions in 2025.

Figure 1 below depicts the reduction in 3-year average CPUC-reportable ignitions in HFTD before and after implementation of EPSS.

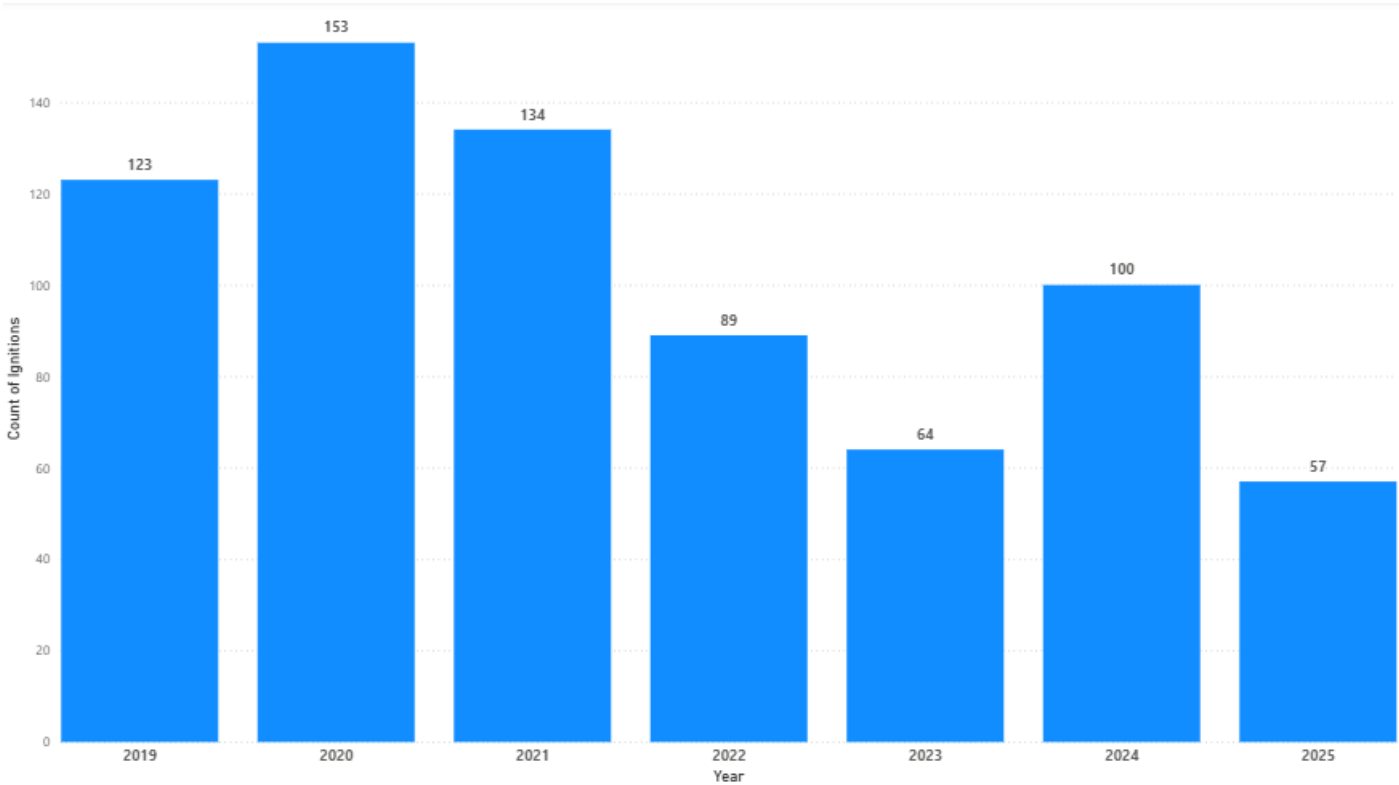
² Since our first full year of tracked ignitions began in 2015.

**FIGURE 1: CPUC-REPORTABLE IGNITIONS IN HFTD PRE-EPSS IMPLEMENTATION (2019-2021)
 COMPARED TO POST-EPSS IMPLEMENTATION (2022-2025)**



Several additional graphics, set out below, help to highlight the change in ignitions that occurred in 2025 as compared to historical averages. For CPUC-reportable ignitions in HFTD, there was a decrease in 2025 compared to prior years, as depicted in Figure 2, which shows the number of CPUC-reportable ignitions for each year since 2019.

FIGURE 2: CPUC-REPORTABLE IGNITIONS in HFTD BY YEAR



The two leading drivers of ignitions in HFTD over the last seven years are vegetation contact and equipment failure. Figure 3 below depicts the significant reduction in CPUC-reportable ignitions caused by vegetation contact in HFTD compared to the 2019 to 2021 period. These are a subset of overall ignitions shown in Figure 2.

FIGURE 3: CPUC-REPORTABLE IGNITIONS CAUSED BY VEGETATION CONTACT IN HFTD AREAS BY YEAR

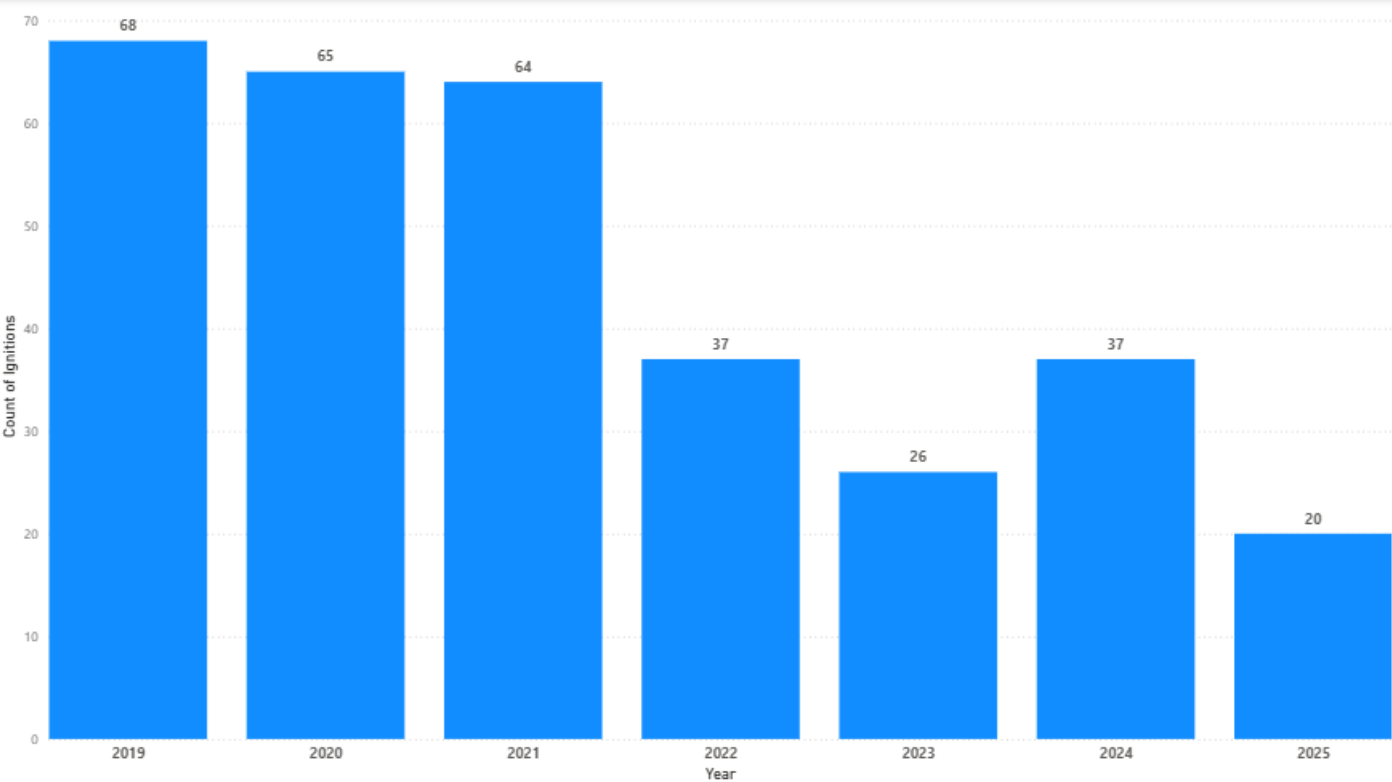
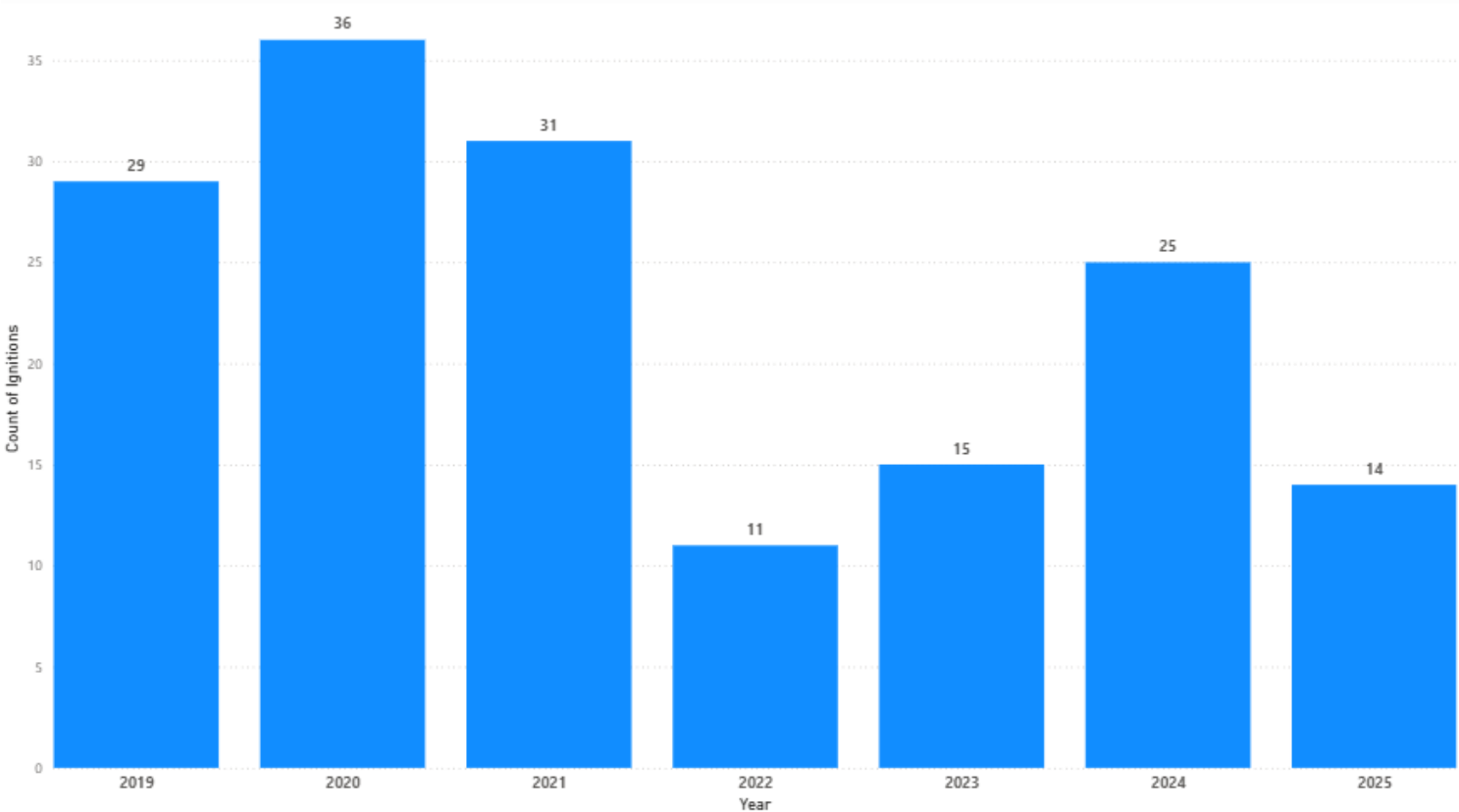


Figure 4 below depicts the significant reduction in CPUC-reportable ignitions caused by equipment failure and overload in HFTD compared to the 2019 to 2021 period. These are a subset of overall ignitions shown in Figure 2. The remaining ignitions are attributed to other causes, including animal contact, utility work and operations, and weather, which comprise a relatively small portion of ignitions.

FIGURE 4: CPUC-REPORTABLE IGNITIONS CAUSED BY EQUIPMENT FAILURE IN HFTD AREAS BY YEAR



While long-term wildfire risk reduction projects like undergrounding continue to be deployed, recent declines in ignitions are mainly attributable to effective and successful operational measures such as PSPS and EPSS. These operational mitigations provide the needed protection from potential ignitions during high-risk times, but can adversely affect reliability, therefore, reliability programs are implemented to minimize customer impacts during events. In 2025, the EPSS program targeted an average outage duration under 165 minutes per customer and achieved a Customer Average Interruption Duration Index (CAIDI) of 137 minutes, including Major Event Days (MED), or about two and a half hours.³ In addition, we leveraged information included in our 2025 EPSS Reliability Study to inform activities meant to improve reliability for customers experiencing outages on circuits protected by EPSS, including performing targeted vegetation management, animal mitigation, design settings refinement to reduce false tripping and circuit reliability improvement work. Our customers experienced four PSPS events that resulted in de-energization in 2025.

The reduction in wildfire risk that we were able to accomplish, as well as how we achieved our 2025 objectives and goals, are both described in more detail in Section II below.⁴

II. ELEMENTS TO BE INCLUDED IN THE ANNUAL IMPLEMENTATION REPORT

Pursuant to Energy Safety’s 2025 *Performance Guidelines*, we provide each of the required elements that must be included in an electrical corporation’s Annual Implementation Report below.⁵

a. Written Narrative including:

Progress Description Summary: A description of the electrical corporation’s progress towards achieving the summarized objectives for the 3- and 10-year WMP plan cycles, as identified in its most recently approved WMP for years up to and including 2025. Progress must be discussed individually for each stated objective.

As outlined in our 2023–2025 Wildfire Mitigation Plan (WMP), PG&E continues to reduce ignition risk through a combination of operational mitigations and long-term system resilience work, while minimizing customer impacts. To guide this effort, we established objectives across four key areas: (1) comprehensive monitoring and data collection; (2) operational mitigations; (3) system resilience; and (4) community impacts. Together, these components strengthen wildfire risk reduction and improve the resilience of both our electric distribution and transmission systems.

³ The CAIDI Excluding MED metric on EPSS circuits was 137 minutes for 2025.

⁴ The specific requirements of the *Performance Guidelines* are in bold and italics.

⁵ Energy Safety *Performance Guidelines* (Dec. 12, 2025), pp. 7-11.

Comprehensive Monitoring and Data Collection Mitigations

Our efforts are centered on closing critical asset and vegetation management data gaps, expanding system monitoring capabilities, and institutionalizing best practice control processes across the organization. Inspection and monitoring programs continue to mature through disciplined gap analysis, trend evaluation, and strong cross functional coordination, enabling greater transparency and consistency in execution. Advanced tools, including line sensors and the One VM platform, enhance real-time situational awareness and provide a single, authoritative source of multiyear historical data to support risk informed planning and decision making. Mitigation recommendations and priorities are governed through established wildfire risk oversight forums, ensuring timely escalation, alignment, and execution of actions that reduce ignition risk while strengthening long term system resilience.

Operational Mitigations

Our operational mitigation strategy includes Public Safety Power Shutoff (PSPS), Enhanced Powerline Safety Settings (EPSS), grid maintenance, and vegetation clearing.

PSPS remains one of our most effective tools during extreme weather, with an estimated 95 percent reduction in catastrophic wildfire risk due to extreme weather conditions. Over the past seven years, 31 PSPS events prevented 1,442 instances of damage or hazards that had the potential to ignite a fire. While PSPS is deployed only as a last resort, we continue to strengthen the system to reduce its frequency and impact. In 2025, PG&E experienced four PSPS events and maintained compliance with CPUC directives for PSPS execution.

EPSS continues to provide rapid fault detection and automatic line de-energization within one-tenth of a second. Using insights from the 2025 EPSS Reliability Study, we prioritized targeted vegetation work, refined device settings, and expanded sectionalization to reduce outage impacts. We also enhanced our Multiple Outage Review Evaluation (MORE) process to develop circuit specific solutions and deployed targeted animal protection measures in areas with higher animal caused outages-an effort already showing positive results.

Downed Conductor Detection (DCD) continues to provide high impedance fault detection to supplement EPSS as an added layer of protection. DCD uses sophisticated harmonic analysis to detect arcing present during high impedance faults and provides an immediate trip response. In 2025, DCD was deployed in over 500 devices, bringing the total number of installations to approximately 2,000 by year-end. DCD likely prevented 45 potential ignitions throughout PG&E service territory in 2025. Through 2025, EPSS and DCD continue to sustain a 69 percent reduction in R3+ ignitions rate compared to pre-EPSS baselines on powerlines protected by safety settings.

Together, PSPS, EPSS, DCD, and related tools create critical layers of protection for customers, while our complementary initiatives aim to minimize outage scope, duration, and customer impact.

System Resilience Mitigations

Our long-term grid resilience work focuses on hardening infrastructure in HFTD and High Fire Risk Areas (HFRA). These initiatives include undergrounding, covered conductor installation, and line removal or remote grid conversions.

In 2025, we hardened a total of 567 distribution miles. This includes a total of 334 undergrounded miles, exceeding the GH-04 Undergrounding target of 330 miles. We also met our GH-01 System Hardening target of 520 miles, completing approximately 306 miles of System Hardening Undergrounding, 207 miles of overhead covered conductor, and 26 miles of line removal.⁶ The work in 2025 reduced wildfire risk by 5.4 percent.

Community Impacts

Reducing customer impacts from EPSS and PSPS remained a priority. We continued implementing customer focused programs—such as the Portable Battery Program (PBP) and the Disability Disaster Access and Resource (DDAR) Program—which provided more than 2,100 portable batteries and over 1,600 permanent home batteries to eligible customers in 2025.

We also enhanced PSPS and emergency preparedness efforts through ongoing community outreach, customer surveys, Safety Partner engagement, and collaboration with Community Based Organizations (CBOs). These efforts ensure communities are informed, prepared, and supported before, during, and after wildfire safety events.

Both in-progress and completed objectives are detailed below for the recently completed Implementation period.

b. Progress Description Detail: A description of the electrical corporation’s progress towards achieving the three- and ten-year detailed objectives listed in the tables in Section 8 of its WMP, including all subsections, with completion dates within the recently completed implementation period, as identified in its most recently approved WMP for years up to and including 2025. Each objective must be discussed individually and, at a minimum, include the following:

- 1. A listing of the initiative(s) and associated tracking identification numbers the electrical corporation is implementing to achieve the objective.***
- 2. Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective are documented and substantiated.***
- 3. The completion date listed in the approved WMP.***
- 4. A summary of the electrical corporation’s progress made during the most recently completed implementation period.***

⁶ GH-01 and GH-04 are not mutually exclusive, as System Hardening Undergrounding miles are included in both targets.

Table 1 below outlines the significant progress made on all our WMP objectives during the 2025 implementation period. Section 8 of the WMP consists of our wildfire mitigations: (1) Grid Design, Operations, and Maintenance; (2) Vegetation Management and Inspections; (3) Situational Awareness and Forecasting; (4) Emergency Preparedness; and (5) Community Outreach and Engagement. Section 9 of the WMP contains PSPS objectives and is included below for completeness. All 3-year objectives are now completed in our 2023-2025 WMP cycle and made notable progress on our ten- year objectives.

Table 1 – List of In Progress 10-Year Objectives

WMP Category	Objective	Utility Initiative Tracking ID	Reference (section & page #)	Completion date listed in WMP	Summary of the progress made during the most recently completed implementation period
Community Outreach and Engagement	Community Engagement - Outreach to HFRA Infrastructure Customers	CO-04	8.5.1.1/ pp 882 to 886	12/31/2032	In 2025, we continued to perform outreach via email and/or phone to assigned critical infrastructure customers in the HFRA through Business Energy Solutions (assigned account managers). The outreach covered the Community Wildfire Safety Program (CWSP), including potential PSPS and EPSS impacts, and updating contact information for critical accounts in the HFRA.
Community Outreach and Engagement	Community Engagement - Outage Preparedness Campaign	CO-05	8.5.1.1/ pp 882 to 886	12/31/2032	In 2025, we conducted one direct-to-customer outage preparedness campaign via email and/or direct mail targeting residential customers in the PSPS more likely or EPSS program scope.
Emergency Preparedness	Common Operating Picture Technology	EP-07	8.4.1.1/ pp 884 to 790	12/31/2028	This multi-year objective remains on track. We continue to design and deploy common operating picture.
Emergency Preparedness	Threats and Hazards Identification and Risk Assessment (THIRA) updates	EP-08	8.4.1.1/ pp 884 to 790	12/31/2023 12/31/2026 12/31/2029 12/31/2032	In 2025, we updated hazard annexes associated with company emergency response plan (CERP) and published them to GDL (Guidance Document Library).
Emergency Preparedness	County Executive Briefings	EP-09	8.4.1.1/ pp 884 to 790	12/31/2032	This multi-year objective remains on track. County briefings will start in 2027 after each THIRA update.
Grid Design, Operations and Maintenance	Eliminate HFTD/HFRA distribution backlog	GM-08	8.1.1.1/ pp 372 to 377	12/31/2029	This multi-year objective remains on track. We are continuously working to eliminate HFTD/HFRA EC notifications distribution backlog by 2029 and have all HFTD/HFRA EC notifications in compliance with GO 95 Rule 18 barring External Factors.

Table 1 – List of In Progress 10-Year Objectives

WMP Category	Objective	Utility Initiative Tracking ID	Reference (section & page #)	Completion date listed in WMP	Summary of the progress made during the most recently completed implementation period
Public Safety Power Shutoff	Evaluate the transition of the Portable Battery Program to permanent battery solutions	PS-05	9.1.3/ pp 920 to 923	12/31/2032	This multi-year objective is on track. We are continuing to evaluate the transition of the Portable Battery Program to permanent battery solutions for PG&E customers at risk of PSPS or EPSS, focusing on but not limited to AFN (Access and Functional Needs), MBL (Medical Baseline), and self-identified vulnerable populations.
Public Safety Power Shutoff	Evaluate emerging technologies to reduce PSPS customer impact	PS-08	9.1.3/ pp 920 to 923	12/31/2032	This multi-year objective is on track. We continue to evaluate the emerging technologies for transmission and distribution that may further reduce scale, scope, or frequency of PSPS.
Public Safety Power Shutoff	Reduce PSPS size, duration, or frequency as part of 10,000-mile undergrounding program	PS-09	9.1.3/ pp 920 to 923	12/31/2032	This multi-year objective is on track. PG&E continues to reduce the PSPS size, duration, or frequency as part of our undergrounding program.
Situational Awareness and Forecasting	Evaluate FPI and IPW Modeling enhancements in 2026 - 2032	SA-06	8.3.1.1/ pp 723 to 729	12/31/2032	This multi-year objective is on track and will start in 2026.
Situational Awareness and Forecasting	Evaluate the Cameras AI system functionalities and technologies	SA-08	8.3.1.1/ pp 723 to 729	12/31/2032	This multi-year objective is on track. We will continue to evaluate the AI system for opportunities to test new functionalities and newly developed breakthrough technologies. We will explore new best practices to ensure the ongoing effectiveness of the system.
Situational Awareness and Forecasting	Evaluate the use and effectiveness of real-time monitoring tools	SA-12	8.3.1.1/ pp 723 to 729	12/31/2032	This multi-year objective remains on track. We continue to evaluate the use and effectiveness of real-time monitoring / situational awareness tools.

Table 1 – List of In Progress 10-Year Objectives

WMP Category	Objective	Utility Initiative Tracking ID	Reference (section & page #)	Completion date listed in WMP	Summary of the progress made during the most recently completed implementation period
Vegetation Management and Inspection	Inspection in HFTD and HFRA supporting key vegetation management initiatives	VM-10	8.2.1.1/ pp. 604 to 611	12/31/2032	This multi-year objective remains on track. We continue with multiple inspection activities supporting key vegetation management initiatives.
Vegetation Management and Inspection	Enhance and refine Focus Tree Inspection – Areas of Concern (AOC)	VM-11	8.2.1.1/ pp. 604 to 611	12/31/2032	This multi-year objective remains on track. We continue work to enhance and refine Focus Tree Inspection - Areas of Concern (AOC) development criteria and application of the AOCs to vegetation management Programs. In 2025, we executed according to AOC v2 and in 2026 we are executing according to AOC v3.
Vegetation Management and Inspection	Evaluate emerging technologies	VM-12	8.2.1.1/ pp. 604 to 611	12/31/2032	This multi-year objective remains on track. We continue to evaluate emerging technologies to enhance focus of and streamline execution of vegetation management activities.

- c. Completion Assessment: An assessment of the electrical corporation’s completion of the 3- and 10-year objectives listed in the tables in Section 8 of its WMP, including all subsections, with completion dates within the most recently completed implementation period, as identified in its most recently approved WMP for implementation years up to and including 2025. Each stated objective must be discussed individually and, at a minimum, include the following information:**
- 1. A listing of the initiatives and associated tracking identification numbers the electrical corporation is implementing to achieve the objective.**
 - 2. Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective are documented and substantiated.**
 - 3. The completion date listed in the approved WMP.**
 - 4. The date the electrical corporation actually completed the objective.**
 - 5. An explanation of how the electrical corporation utilized the identified “Method of Verification” to assess the completion of the objective.**
 - 6. A summary of the electrical corporation’s assessment of completing the objective following use of the verification method described above, including a listing of all evidence relied upon in the electrical corporation’s assessment.**
 - 7. For each objective that the electrical corporation failed to complete, a detailed explanation of what was incomplete, the reason the initiative was not completed, and associated corrective actions the electrical corporation has taken to prevent recurrence of such failures.**
 - 8. If the electrical corporation did not take corrective action to prevent recurrence of such failures, it must provide justification for such inaction.**

Table 2 below summarizes the successful completion of the 3-year and 10-year objectives in Section 8 and 9 of our WMP for the 2025 implementation period.⁷ In the 2025 implementation period, we completed a total of 15 3-year objectives ahead of the initially forecasted completion date that we listed in the WMP.

⁷ While the *Performance Guidelines* did not specify including a progress update for Section 9 of our WMP, PG&E is including an update here for completeness.

Table 2 - List of Completed 3- and 10-Year Objectives

WMP Category	Utility Initiative Tracking ID / Objective	Reference (section & page #)	Completion date listed in WMP	Actual Completion date	Method of Verification	Objective Completion Assessment Method	Reasons for incompletion and corrective actions	Reasons for not implementing corrective actions
Grid Design, Operations and Maintenance	AI-01 / Retainment of Inspectors and Internal Workforce Development	8.1.1.1 & 372 to 377	12/31/2025	2/11/2025	Reviewed Multiyear resource plans	Final report of activities completing the objective to improve the quality of asset inspections and decrease dependency on contractors performing distribution HFTD ground inspections through a multi-year resource plan aimed at adding internal headcount. This initiative has increased our permanent compliance inspector headcount in our organization by 74 inspectors and increased employee tenure.	N/A	N/A
Grid Design, Operations and Maintenance	AI-11 / Filling Asset Inventory Data Gaps	8.1.1.1 & 372 to 377	12/31/2025	7/1/2025	Reviewed list of targeted distribution and transmission equipment types and the baseline rate and actual rate of age data completeness for each targeted distribution and transmission equipment type.	Population of missing age data in the Asset Inventory and Condition Database was completed to more than 90 percent weighted average across risk prioritized distribution and transmission equipment types.	N/A	N/A

Table 2 - List of Completed 3- and 10-Year Objectives

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Community Outreach and Engagement	CO-01 / Community Engagement - Meetings	8.5.1.1 & 882 to 886	9/30/2025	9/10/2025	For In-Person Meetings: Third-party prepared meeting summary For Virtual Meetings: Link to the recorded session and PowerPoint presentation.	For 2025, we held a total of 22 community engagement meetings across the five service regions, in the following formats: 10 Town Halls via webinar in each of the five regions during Q1 and Q2 of 2025, 8 Region-specific Wildfire Safety Webinars, 2 ALL Customer Wildfire Safety Webinars and 2 In-Person Open Houses.	N/A	N/A
Emergency Preparedness Plan	EP-01 / Complete PSPS and Wildfire Tabletop and Functional Exercises	8.4.1.1 & 784 to 790	11/30/2025	9/3/2025	After-Action Reports (AARs) were utilized as the method of verification for each exercise. AAR was written following completion of the exercise. The AAR summarizes the exercise details including dates, times, locations, objectives, scope, participation, strengths, and areas for improvement.	<p>PSPS Tabletop Exercise Exercise conduct date: 3/27/25 AAR completion date: 6/23/25</p> <p>PSPS FSE Exercise Exercise conduct dates: 4/28/2025 - 5/2 2025 AAR completion date: 6/23/25</p> <p>Wildfire Tabletop Exercise Exercise conduct date: 3/27/25 AAR completion date: 6/23/25</p> <p>Wildfire Functional Exercise Exercise conduct dates: 4/28/2025 - 5/2/2025 AAR completion date: 6/23/25</p>	N/A	N/A

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Emergency Preparedness Plan	EP-02 / Maintain all hazards planning and preparedness program in 2023-2025	8.4.1.1 & 784 to 790	12/31/2025	4/30/2025	Check-in/check-out records or After-Action Review (AAR) items	We have maintained the All-Hazards Planning and Preparedness Program through our compliance reporting within the GO 166 filing which was filed on April 30, 2025.	N/A	N/A
Emergency Preparedness Plan	EP-04 / Expand All Hazards planning to include additional threats and scenarios	8.4.1.1 & 784 to 790	12/31/2025	7/21/2025	New annexes being developed	This objective is complete for 2025. We expanded all hazard planning by adding two new Hazard Annexes to the CERP. These include one to support Capacity Shortage events and one to support Volcano events.	N/A	N/A
Grid Design, Operations and Maintenance	GH-02 / Evaluate Covered Conductor Effectiveness	8.1.1.1 & 372 to 377	3/31/2025	3/20/2025	Whitepaper showing the updated covered conductor effectiveness calculation using 2024 outage data	The Program updated the covered conductor recorded effectiveness calculation using 2024 outage data on the lines that have Covered Conductors for consideration in future system hardening workplans. The program was able to provide a Whitepaper showing the updated covered conductor effectiveness calculation.	N/A	N/A

Table 2 - List of Completed 3- and 10-Year Objectives

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Grid Design, Operations and Maintenance	GM-07 / Updates on EPSS Reliability Study	8.1.1.1 & 372 to 377	2/15/2025	2/18/2025	Annual EPSS Reliability Study	The reliability study (outage data along with the narrative) has been submitted to Energy Safety on Feb 18, 2025 (the next regular business day.)	N/A	N/A
PSPS	PS-01 / Evaluate enhancements for the PSPS Transmission guidance	9.1.3 & 920 to 923	12/31/2025	8/13/2025	Documentation on evaluation of update to PSPS guidance	Changes to the PSPS input models occurred since last season, sensitivity analysis was performed, and new guidance was presented to the Wildfire Risk Governance Steering Committee (WRGSC).	N/A	N/A
PSPS	PS-02 / Evaluate incorporation of approved IPW enhancements into the PSPS Distribution guidance	9.1.3 & 920 to 923	12/31/2025	7/10/2025	Documentation on evaluation of update to PSPS guidance	Changes to the PSPS input models occurred since last season, sensitivity analysis was performed, and new guidance was presented to the WRGSC.	N/A	N/A

Table 2 - List of Completed 3- and 10-Year Objectives

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PSPS	PS-10 / Continue sharing PSPS lessons learned	9.1.3 & 920 to 923	12/31/2025	12/17/2025	Monthly meeting notes submitted to CPUC by utility hosting joint IOU meeting	Joint Utility Public Safety Power Shutoff Working Group meetings were held each month to share PSPS lessons learned and best practices with CA IOUs. Each joint working group report was submitted to the CPUC.	N/A	N/A
Situational Awareness and Forecasting	SA-05 / Evaluate FPI and IPW Modeling enhancements in 2023-2025	8.3.1.1 & 723 to 729	12/31/2025	7/25/2025	Documentation that demonstrates evaluation of enhancements to the FPI and IPW model	In August 2024 we deployed the most accurate outage, ignition and fire models to date after years of development and testing new weather models, fuel moisture models, datasets, model frameworks and enhanced resolutions. The 2024 Version 5 models leveraged the latest published science and research to inform PG&E's PSPS program. The white paper titled, "Public Safety Power Shutoff: Models and Guidance for Decision Making," provides an overview of the Version 5 models and framework made operational on August 1st, 2024.	N/A	N/A

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Situational Awareness and Forecasting	SA-07 / Monitor and evaluate the Cameras AI system's performance	8.3.1.1 & 723 to 729	12/31/2025	11/26/2025	Documentation that demonstrates evaluation of enhancements to the Camera AI system	In partnership with Digital Path, we monitored and evaluated the AI system's performance and explored additional features to further enhance the system. All vendor reports expected were received by 11/26/2025.	N/A	N/A
Situational Awareness and Forecasting	SA-09 / EFD and DFA Reporting	8.3.1.1 & 723 to 729	12/31/2025	11/18/2025	A feasibility proposal to the Wildfire Risk Governance Steering Committee (WRGSC) for integrating sensor findings into the inspection program	We performed a feasibility study on the use of EFD/DFA technologies to successfully identify incipient failures as a supplement to field inspections. Additional enhancements are needed for the technology to supplement inspection program, and when completed, a proposal will be made to WRGSC.	N/A	N/A
Vegetation Management and Inspection	VM-09 / Constraint Resolution Procedural Guideline	8.2.1.1 & 604 to 611	12/31/2025	11/19/2025	1. Procedural guideline and evaluation of a "right tree-right place" program. 2. Reports from VM system of record demonstrating added constraints tracking functionality.	Completion of constraint resolution procedural guidelines for this objective.	N/A	N/A

- d. *An assessment of the electrical corporation's completion of all targets identified for each initiative listed in the tables in Section 8 of its WMP, including all subsections, with target completion dates within the most recently completed implementation period. The assessment of each target must be discussed individually and, at a minimum, include the following information:*
1. *A complete listing of all applicable targets.*
 2. *The target value and associated target units.*
 3. *The target completion date (i.e., year-end, Q2, Q3, etc.) listed in the WMP.*
 4. *The date the electrical corporation actually completed the target.*
 5. *An explanation of how the electrical corporation utilized the identified "Method of Verification" to assess the completion of the target.*
 6. *A summary of the electrical corporation's assessment of completing the target following use of the verification method described above, including a listing of all evidence relied upon in the electrical corporation's assessment.*
 7. *For each target that the electrical corporation failed to complete, a detailed explanation of what was incomplete, why, and associated corrective actions the electrical corporation has taken to prevent recurrence of such failures. If the electrical corporation did not take corrective action to prevent recurrence of such failures, it must provide justification for such inaction.*
 8. *An assessment of quality of implementation for initiatives that have a quality control/quality assurance component.*
 9. *An explanation of whether the expected percentage risk reduction, as listed in the WMP, and if desired the intended risk reduction, was achieved during the most recently completed implementation period.*
 1. *If the expected percentage risk reduction of a WMP initiative was not achieved, the electrical corporation must provide the percentage risk reduction actually achieved, explain why expected reduction was not achieved, and discuss any actions it has taken as a result.*
 2. *If the electrical corporation did not take action as a result of missed risk reduction, it must provide justification for such inaction.*
 3. *Initiative information with reduced risk reduction must also be provided in a table with the format shown in Table 2. In the table, the first column is the name or identifying number of the WMP initiative. The second, third, and fourth columns are the value of risk reduction anticipated in the associated WMP for the given initiative, the estimated actual risk reduction achieved, and an explanation of the actual risk reduction or additional actions taken as a result.*

4. If it wishes to do so, the electrical corporation may also discuss the overall risk reduction intent associated with a WMP initiative, whether that risk reduction intent was achieved, and discuss any actions it has taken as a result.

Table 2: Format for Table Response on Risk Reduction Achieved

<i>WMP Initiative</i>	<i>WMP Expected Risk Reduction</i>	<i>Actual Risk Reduction Achieved</i>	<i>Explanation and Actions Taken</i>

Attachment PGE_2025_AIR_Table_3-Targets provides our assessment of the completion of all 40 WMP targets in the 2025 implementation period. See Attachment PGE_2025_AIR_Table_3a-Risk_Information for the risk reduction table in the requested format. Below, we discuss our assessment of quality of implementation for several of our WMP initiatives that have a Quality Assurance/Quality Control (QA/QC) component. Additionally, there are some targets that benefit from further narrative discussion and are included below.

Assessment of Quality of Implementation for Initiatives that have QA/QC Component

PG&E has a QA/QC component that is performed on both its asset management inspection programs. The QA program (GM-01 Asset Inspections – Quality Assurance) is intended to ensure that the QC and Execution program (GM-09 Asset Inspections – Quality Control) is performing as intended through ongoing audits of completed QC locations. As outlined below, our QA/QC programs ensured that we not only met all targets, but we also exceeded all pass rate percentages.

GM-01 Asset Inspections – Quality Assurance

We surpassed the QA target for System Inspections: pass rate of 100 percent on 1,783 System Inspections Transmission audit locations; pass rate of 99.83 percent on 1,781 System Inspections Distribution audit locations.

GM-09 Asset Inspections – Quality Control

We surpassed the QC target for System Inspections: pass rate of 99.99 percent on 19,842 System Inspection Transmission audit locations and pass rate of 99.92 percent on 177,742 System Inspection Distribution audit locations.

Like our QA/QC on systems inspections mentioned above, VM’s Quality Management System is designed to provide multiple layers of defense against hazards and failures. These layers of defense – Quality Control (QC), Quality Assurance (QA) - help build reliable, repeatable, and sustainable processes. QA (VM-08 Vegetation Management Quality Assurance) ensures that the work completed by the QC and Execution teams meets our quality and compliance standards. QC (VM-22 Vegetation Management Quality Control) ensures that completed inspections and tree work performed by VM Execution meet quality standards. Again, our VM QA/QC programs ensured that both targets and pass rate percentages exceeded our targets.

VM-08 – Vegetation Management – Quality Assurance

We surpassed all targets for QA Vegetation Management: pass rate of 100 percent on 2,647 Vegetation Control (VC) pole clearing audit locations; pass rate of 99.92 percent on 4,101 Routine Distribution Vegetation Management audit locations; pass rate of 99.99 percent on 2,042 audit locations Routine Transmission Vegetation Management.

VM-22 – Vegetation Management – Quality Control

We surpassed all target for QC Vegetation Management: pass rate of 99.45 percent on 13,312 VC pole clearing audit locations; pass rate of 99.24 percent on 90,164 Routine Distribution Vegetation Management audit locations; pass rate of 99.76 percent on 15,675 audit locations for Routine Transmission Vegetation Management.

As indicated above, of the 40 completed WMP targets listed in Attachment PGE_2025_AIR_Table_3-Targets, additional narrative discussion is provided for some targets, and which are set out below.

Additional Details on Targets

AI-07 – Detailed Ground Inspections

For this commitment, we achieved 33.54 percent Eyes on Risk (EOR) in 2025, compared to the annual WMP projected target of 45 percent in our 2023-2025 WMP. This variance was expected, as the 3-year WMP workplan was frontloaded with higher risk assets in 2023 and 2024. Despite the lower EOR in 2025, we successfully met the overall intent of the commitment by averaging 48 percent Eyes on Risk across the 3-year 2023-2025 period, exceeding the 44 percent 3-year average Eyes on Risk target established in the 2023-2025 WMP. In addition, consistent with discussions with Energy Safety, Comprehensive Pole Inspections (CPI) were included in the unit count for 2025.

GH-10 – Non-Exempt Expulsion Fuse – Removal

At the beginning of the year, we communicated to Energy Safety that we would not meet the 2025 WMP target of 1,400 non-exempt line fuse removals. This was due to overperformance in previous years, and replacements through other programs, which left the remaining population at the start of 2025 with only 848-line fuses. In efforts to honor our original WMP target of replacing 1,400 non-exempt line fuses in 2025, we removed 770-line fuses and 681 equipment fuses for a total of 1,451. Of the original population of 848-line fuses, 64 were canceled due to work completed prior to the 2025 execution year. Of the remaining 784 locations, 770 were completed in 2025, and 14 were carried into 2026 due to external factors. These final 14 are scheduled for completion in 2026 (we will be tracking these in 2026 to completion). We met this commitment barring external factors.

PS-06 – Provide 12,000 cumulative new or replacement portable batteries to PG&E customers at risk of PSPS or EPSS, focusing on but not limited to AFN, MBL, and self-identified vulnerable populations

In 2025, we provided a total of 3,798 batteries to PG&E customers, consisting of 2,166 portable batteries and 1,632 permanent batteries. The 2025 PS-06 target was to provide 3,300 new or replacement portable batteries. While the initial estimate included 2,000 portable batteries, resulting in a gap of approximately 1,300 batteries, this gap was fully addressed in 2025 through the distribution of more than 1,300 permanent batteries. As a result, the overall WMP target of 3,300 batteries was exceeded.

VM-02 – Pole Clearing Program

Vegetation management inspected, cleared and maintained, where clearing was necessary, 80,301 poles against our WMP target of 77,376 poles (target based on the refreshed asset registry/GIS pull prior to work beginning). The 80,301 poles include 4,907 barring external factors. External factors represent reasonable circumstances which may impact execution against targets or objectives e.g., landholder refusal, weather conditions, removed, or destroyed. We are tracking the gap to target of 1,982 poles, which have external factors, to completion in 2026. We met this commitment barring external factors.

VM-05 – Defensible Space Inspections – Distribution Substation

We completed inspections at 130 substations compared to the WMP target of 131. The gap to target of one is due to the decommissioning of the North Branch substation. For this commitment, 100 percent of the scope has been achieved thus we are marking this initiative as complete.

VM-07 – Defensible Space Inspections – Hydroelectric Substations and Powerhouses

We completed inspections at 58 substations compared to the WMP target of 61. The gap to target is the result of the transfer of ownership of two powerhouses, the indefinite shutdown of two additional powerhouses and the addition of one generating facility due to HFRA boundary change. Please note that, out of an abundance of caution, we completed defensible space inspection at the two decommissioned locations because distribution service still existed at these locations. However, given that there are no longer any active high or medium voltage assets at these locations, we are not counting these inspections toward our target. This work was merely precautionary in measure. For this commitment, 100 percent of the scope has been achieved thus we are marking this initiative as complete.

VM-16 – Distribution Routine Patrol

Based on the feedback from Energy Safety, we updated the previously listed unit of measure from ‘Circuit Miles’ to ‘Span Miles’ in WMDR. Please note that Span miles have always been the unit of measure in our current system of record, One VM.

VM-17 – Distribution Second Patrol

Based on the feedback from Energy Safety, we updated the previously listed unit of measure from ‘Circuit Miles’ to ‘Span Miles’ in WMDR. Please note that Span miles have always been the unit of measure in our current system of record, One VM.

Targets that Have Been Updated from the 2025 Q4 QDR

Please note that, as part of our normal course of work, we want to highlight that the following 8 targets have been updated since our filing of PG&E 2025 Q4 WMDR as a result of either data validation, SAP transaction processing, and/or clerical work inputting data.

GH-05 – System Hardening – Transmission

The final annual value for this work was updated from 19.4 circuit miles to 19.8 circuit miles.

GM-06 – EPSS – Down Conductor Detection (DCD)

The final annual value for this work was updated from 518 DCD’s to 494 DCD’s.

PS-07 – Reduce PSPS Impacts to Customers

The final annual value for this work was updated from 9,219 customer events to 13,327 customer events.

VM-02 – Pole Clearing Program

The final annual value for this work was updated from 81,129 distribution poles to 80,301 distribution poles.

VM-04 – Tree Removal Inventory

The final annual value for this work was updated from 31,702 trees removed to 31,311 trees removed.

VM-16 – Distribution Routine Patrol

The final annual value for this work was updated from 78,476 span miles to 78,438 span miles.

VM-17 – Distribution Second Patrol

The final annual value for this work was updated from 25,713 span miles to 25,704 span miles.

VM-18 – VM for Operational Mitigations (VMOM)

The final annual value for this work was updated from 8,326 trees to 8,165 trees.

- c. A complete listing of all approved petition to amend filings for modification of a WMP requested by the electrical corporation. For each petition, the electrical corporation must include a description of the change requested, the date the electrical corporation filed the petition, and the date that Energy Safety approved the requested petition.*

No petition to amend filings were submitted for initiatives or targets in 2025.

- d. A list that includes the following information for each initiative identified in the WMP:*
- a) Utility Initiative Tracking ID, per WMP Guidelines.*
 - b) Initiative name.*
 - c) Planned budget (as reported in the WMP or approved Change Order) for the implementation period.*
 - d) Actual expenditure for the most recently completed implementation period.*
 - e) If the difference between the actual expenditure and the planned budget is more than 10 percent, provide a detailed explanation of the reason or reasons for the discrepancy.*

In 2025, PG&E successfully achieved its targets and objectives. During our review of financial data to be provided, we determined that there were variances in the Wildfire Accounts across the years 2023-2025. The impacts of these variances will affect what has been previously provided in the

WMP WMDR (Table 11) and the AIR reports (previously the Annual Report on Compliance, or “ARC”), as well as related financial data requests from Safety Policy Division at the Commission. We are reviewing all the costs in both Wildfire and non-Wildfire specific accounts to confirm they should be included in our WMP reporting. Based on our findings we will summarize the changes and communicate them to the appropriate parties. All the details as requested above will be provided at a later time.

e. CONCLUSION

As demonstrated above, PG&E successfully implemented the 2025 wildfire mitigation initiatives outlined in the approved 2023-2025 WMP. We are proud of the work completed in 2025 and of the significant wildfire risk reduction achieved across our service territory. PG&E remains committed to ongoing collaboration with Energy Safety and to upholding our stand that catastrophic wildfires shall stop.