



April 7, 2026

To: Pacific Gas and Electric Company
Daniel Kushner
Senior Director - Electric Risk and Compliance
300 Lakeside Drive, Suite 210,
Oakland, CA 94612

SUBJECT: Pacific Gas and Electric Company's (PG&E's) 2024 Vegetation Management Audit (VMA) Report

Pursuant to the requirements of California Public Utilities Code section 8386.3(b)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) has completed its audit of PG&E's 2024 Vegetation Management activities included in the 2023-2025 Wildfire Mitigation Plan (WMP).

As described in the attached audit report, Energy Safety concluded that PG&E has successfully achieved the objectives of 12 initiatives within its vegetation management program and has an outstanding deficiency in one initiative in performance year 2024.

Pursuant to statutory requirements, a copy of this report is issued to PG&E, published on Energy Safety's 2024 VM Audits Docket, and provided to the California Public Utilities Commission (CPUC).

Sincerely,

A handwritten signature in cursive script that reads 'Sheryl Bilbrey'.

Sheryl Bilbrey
Program Manager, Environmental Science Division
Office of Energy Infrastructure Safety

Cc:
Eric Wu, CPUC
Karen McLaughlin, Energy Safety
Alec Latuszek, Energy Safety
Mandy Knockaert, PG&E
Rahima Manderola, PG&E
Savannah Torres, PG&E

April Schneider, PG&E

Attachment: PG&E 2024 VMA Report



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
2024 VEGETATION MANAGEMENT
AUDIT REPORT
PACIFIC GAS AND ELECTRIC COMPANY

April 7, 2026

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Appendix 2. Pacific Gas and Electric Company 2024 Vegetation Management Audit Corrective Action Plan

EXECUTIVE SUMMARY

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) may audit the vegetation management work performed by, or on behalf of, the electrical corporation following the end of the performance period.

The Pacific Gas and Electric Company (PG&E) 2023-2025 WMP had 13 vegetation management initiatives in six programmatic areas. Energy Safety provided its Vegetation Management Audit (VMA) of PG&E's work related to its vegetation management commitments in its Wildfire Mitigation Plan (WMP) on October 14, 2025 (included in Appendix 1).¹

The VMA identified that PG&E did not provide sufficient documentation that all work was complete for seven of the 13 vegetation management initiatives. PG&E provided its Corrective Action Plan (CAP) on November 14, 2025 (included in Appendix 2).² The CAP included additional data, clarifications, and corrective actions regarding the deficient vegetation management initiatives.

As discussed in this VMA Report, PG&E has provided sufficient documentation to demonstrate that all work identified in 12 of the 13 vegetation management initiatives in its 2023-2025 WMP was either implemented successfully in 2024 or that PG&E has provided a CAP that addresses deficiencies for those 12 initiatives. PG&E has an outstanding deficiency in one of the 13 VM initiatives: 8.2.3.2 Wood and Slash Management.

¹ Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)).

² Pacific Gas and Electric Company, 2024 VMA Corrective Action Plan (November 14, 2025), ([Appendix 2](#)).

1. INTRODUCTION

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) may audit the vegetation management work performed by, or on behalf of, the electrical corporation following the end of the performance period. The VMA includes three phases:

1. **The audit.** The VMA identifies deficiencies in the electrical corporation's implementation of the vegetation management commitments in its WMP.³ Energy Safety provided the 2024 VMA to PG&E on October 14, 2025, via electronic mail.⁴ The VMA is included in Appendix 1.
2. **The CAP.** Energy Safety then provides the electrical corporation time to respond to and develop corrective actions for any deficiency specified in the VMA and to provide this response in its CAP. The electrical corporation may provide supplemental data, additional supporting documentation, clarifying statements, and corrective actions for consideration by Energy Safety for use in its final determination of the electrical corporation's performance relative to its WMP vegetation management commitments. PG&E provided its CAP to Energy Safety on November 14, 2025.⁵ PG&E's CAP is included in Appendix 2.
3. **The audit report.** Energy Safety then reviews the CAP and issues a VMA Report to the electrical corporation identifying any outstanding deficiency in the electrical corporation's implementation of its vegetation management commitments in the WMP. The VMA Report is publicly available on Energy Safety's E-Filing System on the 2024 VM Audits Docket. The VMA and CAP (items 1 and 2 above) are included as appendices within the VMA Report. This VMA Report document concludes the VMA process for the 2024 performance year.

The VMA Report document is organized as follows:

- Section 2 includes a summary of the deficiencies identified during the VMA, PG&E's CAP, and Energy Safety's final determination of outstanding deficiencies in PG&E's implementation of or planned corrective actions for the 2024 WMP vegetation management commitments.

³ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

⁴ Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)).

⁵ Pacific Gas and Electric Company, 2024 VMA Corrective Action Plan (November 14, 2025), ([Appendix 2](#)).

- Section 3 includes a discussion of PG&E’s vegetation management program maturity and programmatic performance relative to the achievement of the objectives of WMP in 2024.
- Section 4 is Energy Safety’s conclusion regarding PG&E’s completion of all work associated with its WMP commitments and program performance for 2024.

2. PG&E’s 2024 VMA FINDINGS

PG&E’s 2023-2025 WMP identifies the objectives, preventative strategies, and programs that PG&E has implemented to minimize the risk that its infrastructure will cause catastrophic wildfire. Energy Safety analyzed each of the 13 vegetation management initiatives listed in Section 8.2 (Vegetation Management and Inspections) of PG&E’s 2023-2025 WMP⁶ as part of the initial audit. Each initiative includes one or more commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and narrative, but verifiable, statements (e.g., implementation of personnel training programs). Energy Safety identified the WMP quantitative commitments and narrative statements within each initiative and determined whether PG&E had completed all work associated with each commitment in performance year 2024. Energy Safety’s determination of whether all work was complete was based on data and documentation submitted by PG&E.

Energy Safety determined that an initiative was “complete” if PG&E provided sufficient data or supporting information demonstrating completion of all commitments (targets and/or statements) within that initiative. If any commitment was incomplete or insufficiently documented, Energy Safety determined that the initiative was “deficient.”

Energy Safety’s VMA found that PG&E provided data and documentation to support completion of work for six of the 13 initiatives and did not provide information and documentation to support completion of work for seven initiatives. For six out of the seven deficient initiatives identified in the VMA, PG&E’s CAP provided additional documentation and information to demonstrate that either all work identified in those six vegetation management initiatives was completed or that PG&E has provided sufficient corrective actions to address any remaining deficiencies. Energy Safety found that PG&E has an outstanding deficiency in one vegetation management initiative in its 2023-2025 WMP. This deficiency is summarized in Table 1.

⁶ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

Table 1. Summary of PG&E's outstanding deficiency in performance year 2024.

Vegetation Management Initiative	Description of Deficiency
8.2.3.2 Wood and Slash Management	PG&E did not provide data to substantiate the management of debris less than four inches in diameter generated by its vegetation management activities.

2.1 WMP VM commitment assessment approach

The purpose of the VM Audit is to determine whether PG&E performed all work related to commitments made in its WMP and identify any deficiencies in PG&E's vegetation management programs that have the potential to increase wildfire ignition risk.

The VMA includes the following steps:

1. **Completion of Work-** Determination of whether the electrical corporation submitted sufficient documentation to demonstrate that it performed all work for each of the vegetation management commitments described in the WMP.

If the electrical corporation provided sufficient documentation demonstrating that all work was completed for all commitments within an initiative, Energy Safety concluded that the initiative is complete, and the analysis ended here. If the electrical corporation did not provide sufficient documentation to conclude that all work was complete, then Energy Safety continued the analysis to include one or more of the following:

2. **Assessment of Constraints-** Energy Safety reviewed the documentation provided regarding constraints to determine acceptability and commitment to resolving constraints in a timely way.
3. **Corrective Actions-** Energy Safety reviewed the corrective actions proposed by the electrical corporation to determine if the proposed corrections will prevent future deficiencies and ensure that WMP commitments will be completed in future performance years.
4. **Achievement of Objective-** Determination of whether the electrical corporation's incomplete work has detracted from its ability to achieve the objective of the initiative after considering constraints and planned corrective actions.

2.2 Analysis of work commitments associated with 2024 VM Initiatives

PG&E's 2024 VMA findings identified seven initiatives for which PG&E initially did not provide sufficient documentation to support that all work was completed. For six out of the seven initiatives PG&E was able to provide additional documentation and corrective actions in its CAP to support that either all work identified of these vegetation management initiatives was completed or that PG&E has provided corrective actions to address any remaining deficiencies. Energy Safety concluded that PG&E had an outstanding deficiency in one initiative in 2024.

A summary of Energy Safety's VMA findings regarding the VM initiatives and VMA Report determinations are presented in Table 2. A finding of "Completed" for the VMA Report indicates that PG&E provided additional documentation in its CAP to support that all work was completed. A finding of "Achieved Objective" indicates that, while Energy Safety identified some deficiencies, the majority of the work was completed and the CAP provided corrective actions that have been or will be implemented to address any remaining deficiencies. A finding of "Deficient" indicates that PG&E did not complete all work or did not sufficiently address the deficiencies in its CAP. Energy Safety's analysis which resulted in these conclusions is described for each initiative below.

Table 2. Summary of Energy Safety's findings regarding completion of PG&E's VM Initiatives in its 2023-2025 WMP for performance year 2024. Deficient initiatives are bold.

Vegetation Management Initiative	VMA Finding	VMA Report Finding
8.2.2. Vegetation Management Inspections	Deficient	Achieved Objective
8.2.3.1 Pole Clearing	Deficient	Achieved Objective
8.2.3.2 Wood and Slash Management	Deficient	Deficient
8.2.3.3 Clearance	Completed	Completed
8.2.3.4 Fall-In Mitigation	Completed	Completed
8.2.3.5 Substation Defensible Space	Completed	Completed
8.2.3.6 High-Risk Species	Completed	Completed
8.2.3.7 Fire Resilient Right-of-Ways	Completed	Completed
8.2.3.8 Emergency Response of Vegetation Management	Deficient	Achieved Objective
8.2.4 Vegetation Management Enterprise System	Deficient	Achieved Objective
8.2.5. Quality Assurance and Quality Control	Completed	Completed
8.2.6 Open Work Orders	Deficient	Achieved Objective
8.2.7 Workforce Planning	Deficient	Achieved Objective

VMA Finding 1. 8.2.2. Vegetation Management Inspections

The purpose of this initiative was to describe the “Inspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment.”⁷

Summary of Initiative Work Commitments and Identified Deficiencies, PG&E’s CAP Response, and Analysis of CAP Response

Energy Safety assessed performance relative to PG&E’s WMP commitments for nine inspection programs: Routine Patrol-Transmission, Second Patrol-Transmission, Routine Patrol-Distribution, Second Patrol-Distribution, Integrated Vegetation Management, Tree Removal Inventory, Focused Tree Inspections, Vegetation Management for Operational Mitigations and Substation Defensible Space Inspections. Energy Safety identified the following deficiencies in PG&E’s inspection program: Missed targets associated with its Routine Patrol-Distribution (VM-16) and Second Patrol-Distribution (VM-17) Inspections, failure to complete level 2 inspections associated with its Focused Tree Inspections (VM-03), and Missing Tree Risk Assessment Qualification (TRAQ) forms associated with its Tree Removal Inventory.

Missed Targets in Distribution Routine Patrol and Distribution Second Patrol

VMA Summary

In its 2023-2025 WMP, PG&E committed to inspecting 78,650 circuit miles under its Distribution Routine Patrol Program⁸ and 25,485 circuit miles of its distribution system in High Fire Risk District (HFTD) and High Fire Risk Area (HFRA) locations under its Distribution Second Patrol Program in 2024.⁹ PG&E provided documentation which indicated that its Distribution Routine Patrol program inspected 78,308 span miles,¹⁰ and its Distribution Second Patrol Program inspected 25,519 span miles in 2024.¹¹ PG&E stated that the unit of measure it used to track target progress in 2024 was “span miles” as opposed to “circuit miles.” PG&E stated that span miles is a different unit of measure than circuit miles but could not provide a conversion between the two units of measure and stated that its system of

⁷ Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁸ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 344, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

⁹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 344, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹⁰ Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), p. A-17.

¹¹ Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), pp. A-18 to A-19.

record (One VM) only tracks inspection progress in span miles.¹² Because PG&E did not provide a method for converting span miles to circuit miles, it did not demonstrate that the documented span miles of Routine Patrol and Second Patrol inspections were equivalent to or greater than the circuit mile targets in its 2023–2025 WMP.

PG&E's CAP Response

PG&E clarified why the units associated with its WMP target and work tracking system were different. PG&E stated that it used its Electric Distribution Geographic Information System (EDGIS) to establish its WMP target for VM-16 and VM-17 in circuit miles and used span miles in its One VM system to report annual target attainment. Regarding the differences between these systems, PG&E stated that:

“EDGIS is a geospatial system used to track assets and electric network connectivity. The EDGIS system contains information on assets like poles, conductors, undergrounded assets, conductor segments (physical wire), and the length of those segments. EDGIS is not designed to track work progress. The way physical wires are captured in EDGIS can change often and do not always match the assets that are in the field at a given point in time.”¹³

PG&E stated that inspections are conducted on spans, which is the space between adjacent supporting poles or structures on a circuit consisting of electric lines and equipment, and that this work is tracked in its One VM system. PG&E stated that:

“the One VM pole-to-pole / pole-to-structure span does closely match EDGIS, however, there is still a small variance. Our recent analysis shows that there is approximately a 1% difference in total Conductor Miles (EDGIS) and total VM Span Miles (One VM).”¹⁴

PG&E stated that it considered the targets for routine and patrol inspections (VM-16 and VM-17) complete due to all inspections being met per the VM system of record. To demonstrate that PG&E reviewed all spans, PG&E provided the work order line item (WOLI) status for each span for its Routine and Patrol Inspection programs. PG&E stated that the WOLI status is utilized to track the completion of work on each span in its system. Regarding these records, PG&E stated that all spans in One VM for VM-16 and VM-17 had a WOLI status assigned, and all WOLI statuses align with its definition of the work being either complete, unnecessary, or constrained.¹⁵

¹² Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), p. A-17.

¹³ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 3.

¹⁴ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 5.

¹⁵ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 1.

PG&E also provided a summary of the WOLI status for each span with its CAP. For its Routine Distribution Inspections, the documentation showed that 78,308 span miles had a WOLI status of “approved,” or “inspected,” 1,302 span miles were “Not Found,” and 69 span miles were “Constrained” resulting in a total of 79,678 span miles covered by Routine Distribution in 2024.¹⁶ For its Distribution Second Patrol Inspections, 25,519 span miles had a WOLI status of “Approved” or “Inspected,” 748 span miles were “Not Found,” and 61 span miles were “Constrained,” resulting in a total of 26,328 span miles covered by Second Patrol Distribution in 2024.¹⁷

As corrective actions, PG&E further stated that:

- *Moving forward, VM is committed to continuously enhancing our tools and processes to improve accuracy and transparency. VM plans to implement the following initiatives in the future:*
- *VM will improve the definition of mileage, providing increased visibility into the lineage of the data. This means clearly identifying the origin and flow of the data from both the EDGIS and One VM systems.*
- *VM will continue to assess the feasibility of aligning EDGIS conductor segments to One VM spans, which would further improve the alignment of our asset tracking system EDGIS with our work management systems like One VM.*¹⁸

CAP Analysis

Energy Safety analyzed PG&E’s CAP response, which contained additional information regarding PG&E’s tracking of its VM-16 and VM-17 targets during performance year 2024, and concluded that the additional information provided in the CAP was sufficient to address the deficiencies identified in the VMA. PG&E stated that the inspection records submitted with its CAP included an entry for each electric distribution line span in its system of record for VM-16 and VM-17. Energy Safety reviewed these records and concluded that PG&E either inspected or attempted to inspect every span in its One VM system as part of its 2024 Distribution Routine Patrols and completed all spans associated with its Second Patrols.

In its 2023–2025 WMP, PG&E described its Distribution Routine Patrol program as completing scheduled inspections on all of PG&E’s overhead primary and secondary distribution facilities.¹⁹ The documentation provided by PG&E demonstrated that each span in its system of record was either inspected, verified in the field to not exist, or was unable to be inspected due to external factors. While less than 1% of span miles associated with its Routine Patrol (69

¹⁶ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), pp. 2-3.

¹⁷ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 5.

¹⁸ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 4.

¹⁹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 664, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

of the 79,678) and Second Patrol (61 of the 26,328) were not inspected due to constraints, Energy Safety concluded that the amount of mileage which was constrained by external factors was minimal and did not indicate that a deficiency existed in PG&E's Distribution Routine Patrol program in 2024.

In response to a data request, PG&E provided documentation which indicated that nearly all of the constrained mileage from 2024 were inspected in 2025, and that as of March 6, 2026, approximately 0.5 span miles are still either constrained or pending inspection.²⁰ Energy Safety expects PG&E to continue to resolve the work constraints brought on by external factors that are preventing inspection of these span miles, assess vegetation conditions, and perform any necessary mitigation work.

While improvements are needed to ensure consistent mileage reporting and to complete inspections for a limited number of span miles affected by external factors in 2024, Energy Safety concluded that the information provided in PG&E's CAP demonstrated that PG&E completed its 2024 Distribution Routine Patrol target (VM-16) and Distribution Second Patrol target (VM-17) as described in its 2023–2025 WMP.

Failure to Complete Level 2 Inspections Associated with Focused Tree Inspections (FTI) (VM-03)

VMA Summary

PG&E included a target to inspect vegetation along 1,500 circuit miles of its distribution system in Areas of Concern (AOC) under its FTI Program and to conduct Level 2 inspections for all trees along those circuit miles that could strike PG&E's distribution system infrastructure.²¹ PG&E provided documentation which indicated that the FTI program inspected 1,557 distribution circuit miles in AOC, but did not demonstrate that a Level 2 inspection was performed for each potential strike tree along those miles.²²

PG&E's CAP Response

In its CAP, PG&E stated that there were mid-year process changes that created inconsistencies in how Level 2 inspections were documented:

In 2024, [PG&E] completed an enhancement to the One VM application that allowed inspectors to check a box to confirm Level 2 inspections were being completed. This

²⁰ Data Request OEIS-E-VMA_2026-PG&E-001, Questions 4 and 5; attachments

"PGE_2024_WMP_VM_Audit_DR_20260306_20260219_Atch04,"

"PGE_2024_WMP_VM_Audit_DR_20260306_20260219_Atch05."

²¹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 341, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²² Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), p. A-22.

enhancement allowed for improved record-keeping practices and also introduced the ability to have a True/False field in the data pulled for FTI to confirm if Level 2 inspections were completed. FTI inspectors were informed of this enhancement via an FTI Supplemental Guide that was rolled out concurrently with the FTI Bulletin, TD-7102P-01-B041, on 07/24/24. The supplemental guide provided inspectors with a note stating that all FTI Veg Points need a prescription record stating a Level 2 inspection had been completed and also provided directions to toggle 'On' for the Level 2 inspection button within the One VM application. This messaging carried over into 2025, when we released Revision 3 of the FTI Procedure along with an updated revision of the FTI Supplemental Guide in February 2025.

Prior to that improvement, field inspectors were required to document the completion of Level 2 inspections within the comment section of the inspection, which was essentially an open text field. The instructions to document the completion of Level 2 inspections in the comment field for all trees were delivered on 4/16/2024 via an internal guidance document.²³

PG&E also provided additional documentation in its CAP showing FTI inspection records from 2024 that included “Inspected Comments” and “Prescription Comments” fields, as well as the field indicating whether the Level 2 inspection button implemented in PG&E’s One VM application mid-year was selected. PG&E stated that this documentation demonstrates that its inspectors performed a Level 2 inspection on 874,028 trees, which shows that 73% of the FTI trees received the Level 2 inspection.²⁴ PG&E stated that it considered the remaining Level 2 inspections “validated through acknowledgement of inspection completions as defined in our procedures.”²⁵ PG&E stated that the mid-year process change will result in more consistent data in future years.

CAP Analysis

Energy Safety analyzed PG&E’s CAP responses for the level 2 inspections for FTI and concluded that the corrective actions described in PG&E’s CAP were sufficient to address the deficiencies identified in the VMA because it would require field crews to document that the Level 2 inspections were completed.

Energy Safety reviewed the inspection records submitted as part of PG&E’s CAP. The documentation indicated a Level 2 inspection was documented for 874,026²⁶ of the 1,225,637

²³ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 7.

²⁴ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 7.

²⁵ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 7.

²⁶ Energy Safety determined that 874,026 inspection records indicated that Level 2 inspections were performed in contrast to the 874,028 records reported in PG&E’s CAP.

(71%)²⁷ trees inspected under PG&E's Project Year 2024 FTI Program, but the remaining 351,608 trees (29%) did not contain documentation to verify that PG&E performed a Level 2 inspection. PG&E asserts that, under its procedural requirements, these inspections can be inferred to have been conducted using Level 2 methodology. However, the inspection records themselves do not document the inspection methodology used for those trees.

The information provided in PG&E's CAP indicated that PG&E began implementing corrective actions to improve its FTI record keeping in 2024 by adding new data fields to its system of record and requiring inspectors to confirm when Level 2 inspections were completed. Because these corrective actions were implemented mid-year, the 2024 records do not demonstrate that a Level 2 inspection was consistently completed for every potential strike tree assessed; however, Energy Safety accepts that the described corrective actions will address the deficiency identified in the VMA.

Missing TRAQ Forms Associated with the TRI

VMA Summary

PG&E committed to uploading digital records of completed TRAQ forms to its Field Maps application whenever a TRAQ-certified arborist determined that a tree which was prescribed for mitigation by PG&E's legacy Enhanced Vegetation Management Program no longer required work.²⁸ PG&E provided documentation indicating that 5,658 such trees were reassessed in 2024, but 91 (2%) did not have a completed TRAQ form.²⁹

PG&E's CAP Response

In its CAP, PG&E did not dispute that TRAQ forms were missing for a subset of trees associated with the Tree Removal Inventory. However, PG&E stated that of the 5,658 trees assessed in 2024, only eight (0.1%) did not have a completed TRAQ form and of those eight, three trees in 'Hold' status had TRAQ forms completed but not uploaded, and five were constrained.³⁰ As part of its CAP, PG&E provided updated records for the 91 trees without a documented TRAQ form that Energy Safety identified in the 2024 VMA.³¹

²⁷ PG&E noted in its CAP that its repull of data for its CAP response yielded additional prescriptions for FTI in 2024 resulting from additional prescriptions following quality patrol, as well as work carried over from 2024. By including these additional inspection records in its analysis, Energy Safety determined that 71% of the inspection records provided in PG&E's CAP had documentation of Level 2 inspections completed. This is in contrast to the 73% figure reported in PG&E's CAP which referenced only the 1,203,745 inspection records identified by Energy Safety during the VMA.

²⁸ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 646, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²⁹ Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), p. A-21.

³⁰ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 6.

³¹ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 6.

CAP Analysis

Energy Safety analyzed PG&E's CAP response, which contained updated information for the TRI records with missing TRAQ forms, and concluded that the additional information provided in the CAP was sufficient to address the deficiencies identified in the VMA.

The original records indicated that 91 trees did not require work due to a reassessment by a TRAQ Certified Arborist, a determination that requires the inspector to upload a completed TRAQ form to PG&E's system of record. However, the updated records show that many of the trees did not require work because the tree was removed or no longer had strike potential to PG&E's infrastructure. In other cases, the updated records indicated that a TRAQ Certified Arborist still needed to inspect the trees and upload a completed TRAQ form before a determination that no work was required could be made.

The records originally provided during the 2024 VMA indicated that inspectors selected inaccurate "no work" reasons in 2024, demonstrating that errors existed in PG&E's TRI data at that time. However, the updated records submitted as part of PG&E's CAP indicated that, for each tree reassessed by a TRAQ Certified Arborist in 2024 and determined to no longer require work, a completed TRAQ form has been uploaded to PG&E's system of record.

Initiative Level Determination

The objective of this initiative was to inspect vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment. The information provided by PG&E during Energy Safety's 2024 VMA indicated that PG&E implemented nine inspection programs in 2024 that identified vegetation which threatened PG&E's electrical infrastructure and prescribed mitigation as needed. The deficiencies identified by Energy Safety during the initial audit related to PG&E's record keeping and its documentation of completed work. PG&E provided additional information in its CAP which either supported that all work was completed or implemented acceptable corrective actions to address the deficiencies.

Based on the information provided by PG&E, Energy Safety concluded that PG&E achieved the objective of Initiative 8.2.2 Vegetation Management. Energy Safety found no outstanding deficiencies in this initiative.

VMA Finding 2-8.2.3.1 Pole Clearing

The purpose of this initiative was to describe the “Plan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area).”³²

Summary of Initiative Work Commitments and Identified Deficiencies, PG&E’s CAP Response, and Analysis of CAP Response

In its 2023-2025 WMP, PG&E committed to inspect, clear, and maintain, where clearing is necessary, 63,000 poles per PG&E’s Vegetation Control Standard TD-7112S document.³³ PG&E did not provide documentation to support that it met its pole clearing target.

Deficiencies Associated with Pole Clearing

VMA Summary

During Energy Safety’s initial audit, PG&E provided documentation which indicated that PG&E attempted to inspect and clear (where necessary) 77,152 poles during its 2024 pole clearing cycle for its VM-2 pole clearing target. However, 17,622 of those 77,152 (23%) poles were either pending work due to constraints, only partially cleared because of customer refusals, missing required work related to California Code of Regulations (CCR) Title 14, section 1254(c), or listed with a “Null” or “Not Found” completion status, making it unclear whether all necessary work had been completed. Therefore, Energy Safety concluded that PG&E did not provide documentation to support completion of this target.

PG&E’s CAP Response

In its CAP, PG&E stated that it counted poles with a work status of “Completed, Pending 1254(c),” “Completed, Partial Refusal,” “Constrained,” and “Not Found” towards the 2024 pole clearing target. PG&E also provided the updated work status for the poles Energy Safety identified in the 2024 VMA as well as corrective actions.³⁴

³² Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

³³ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, pp. 608, 615, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

³⁴ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 9.

PG&E provided the following updates and clarifications related to work status and corrective actions:

Completed, Pending 1254(c). PG&E stated in its CAP:

This status indicates that 1254(a) and (b) work was completed at the date provided, and 1254(c) work was outstanding, as it requires different field resources to complete due to the nature of the work. [PG&E] deemed these poles “complete” toward the WMP Initial Clear target definition at that point in time. All poles continued to be actively managed and statuses updated in subsequent visits, per TD-7112P-01.

Regarding the 12,378 poles with this status, PG&E provided the following updates:

- For 11,356 poles, work was completed or PG&E identified that no 1254(c) work was needed per the relevant procedure at the time.
- 305 poles were constrained; PG&E is actively working to resolve the constraints.
- 717 unconstrained poles will be completed by the end of the 2025 project year, barring external factors.

PG&E provided the following corrective action:

In response to this finding, [PG&E is] drafting a bulletin to TD-7112P-01 to clarify and tighten expected timelines for completing 1254(c) work in relation to initial clear and maintenance cycles. [PG&E] acknowledge[s] that this is an area needing improvement so that these poles can be moved to “Completed” tree work status alongside the “Complete, Pending 1254(c)” status.

Completed, partial refusal. PG&E stated in its CAP:

This status indicates that a substantial part of the cylinder surrounding the pole was cleared to the extent agreed upon by the customer(s) adjacent to the pole. The clearing varied by each unique customer and situation. We also deemed these poles “complete” toward the WMP Initial Clear target definition at that point in time.

Regarding the 1,214 poles with this status, PG&E provided the following updates:

- For 680 poles, work was either completed, not worked per procedure, or completed, pending 1254(c) with work to be completed in 2025.
- 38 poles were not subject pole locations or were duplicated pole locations and will be removed from the system’s inventory
- 496 were constrained or partially constrained and continue to be reassessed during all VC Pole Clearing cycles and cleared to the extent possible.

PG&E stated that it plans to remove this status and utilize other “Constrained” categories to describe the work status, in line with other VM programs as a corrective action.

Constrained. PG&E's stated in its CAP:

Poles with a "Constrained" Initial Clear status in 2024, represent locations we were unable to work due to external factors such as safety, customer refusal, access or environmental concerns. Again, [PG&E] deemed these poles "complete" toward the WMP Initial Clear target definition at that point in time.

Regarding the 3,654 poles with this status, PG&E provided the following updates:

- For 1,858 poles, PG&E resolved constraints and completed work, did not work per procedure, or completed, pending 1254(c) with work pending in 2025.
- 16 poles were not subject pole locations or were duplicated pole locations and will be removed from the system's inventory
- 1,780 locations remained constrained throughout the 2024 project year and were reevaluated during the 2025 inspection cycle.

PG&E stated that its current process to resolve constraints can be better aligned with other Distribution Routine work, and as a corrective action, are working to adopt the standardized Vegetation Management constraints processes within the Pole Clearing program.

Not Found.³⁵ Regarding the eight poles with this status, PG&E's stated in its CAP:

Per procedure TD-7112P-01, locations can receive ["Not Found"] status during the Initial Clear cycle if no work is identified. Again, poles with a ["Not Found"] status were to be deemed "complete" toward the WMP Initial Clear target definition at that point in time.

NULL. Regarding the 18 poles with this status, PG&E provided the following updates:

- 14 poles were removed from inventory and counted as completed units toward the 2024 WMP target.
- 1 pole was completed per the system of record.
- 3 poles were erroneously listed as "NULL" status

PG&E also stated in its CAP:

While transitioning to the One VM system in 2024, a "NULL" designation was assigned where an historical pole did not exist and therefore no work was needed. To address this, [PG&E] used the One VM comment field to indicate that no work was required and the pole was either no longer in existence or no longer subject to PRC 4292 requirements.

³⁵ During a meeting with Energy Safety, PG&E clarified that the reference in its CAP to "No Work" poles was intended to describe poles with a "Not Found" status.

PG&E stated that it acknowledged gaps in data reporting and recognized the need to provide additional clarification to ensure transparency and accuracy. PG&E stated that it was “refining [its] processes and maintaining reliable error tracking to ensure data management issues are addressed quickly and effectively.”³⁶

CAP Analysis

Energy Safety analyzed PG&E’s CAP responses for the pole clearing initiative and concluded that the corrective actions described in PG&E’s CAP were sufficient to address the deficiencies identified in the VMA.

During the 2024 VMA, PG&E’s pole clearing records indicated that 17,622 of the 77,152 poles (23%) counted toward its 2024 pole clearing target (VM-02) were either: still pending vegetation management work, recorded as not found in the field, or assigned a “Null” work status, making it unclear whether all required work had been completed. Because these records indicated that a substantial portion of vegetation management work identified in 2024 to mitigate wildfire ignition risk remained incomplete, the VMA concluded that a deficiency existed with respect to PG&E’s Initiative 8.2.3.1 Pole Clearing.

PG&E stated in its CAP that the 77,152 poles reported as completed towards its pole clearing program target were consistent with its WMP Initial Clear target definition at that point in time. In its 2023-2025 WMP, in reference to its pole clearing program target, PG&E stated that “poles per Vegetation Control Standard TD-7112S will be inspected, cleared, and maintained where clearing is necessary.”³⁷ PG&E’s Vegetation Control Standard TD-7112S R1, effective July 3, 2024, states that exceptions such as but not limited to “customer interference,” and “agency constraints” must be documented and that “If a location requires work beyond the capabilities of a VC field technician, such as work outlined in 14 CCR § 1254(c), then an approved contract partner must complete the work.”³⁸ The procedures do not include timeframes for resolving these exceptions or completing CCR Title 14, Section 1254(c) work, which includes removing dead, diseased, or dying limbs and foliage from living trees within eight feet of the conductor’s highest attachment point, as well as removing dead, diseased, or dying trees in their entirety.

Energy Safety concluded that PG&E’s 2024 pole clearing program target (VM-02) was executed as described in PG&E’s 2023-2025 WMP. The information provided by PG&E indicated that work constraints were documented as described in PG&E’s Vegetation Control Standard TD-7112S procedure and work outlined in CCR Title 14 § 1254(c) (of Title 14 of the California Code of Regulations) was identified and documented as needing to be executed.

³⁶ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), pp. 9-11.

³⁷ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 340, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

³⁸ Pacific Gas and Electric Company, Utility Standard: TD-7112S, Rev. 2, Publication Date July 3, 2024.

Energy Safety understands that external factors can constrain work and cause delays which are outside PG&E's control, or that different field resources are required to perform 14 CCR § 1254(c) work. PG&E's CAP indicates that since the end of the 2024 performance year, PG&E has made progress in resolving some of the work constraints that were preventing work completion in 2024 and has completed or determined that work was no longer needed for the majority of the pending CCR Title 14 § 1254(c) work identified in the VMA. PG&E's CAP also commits to aligning pole clearing constraint-resolution processes with those used in its Distribution Routine program and clarifying expectations for completing CCR Title 14 § 1254(c) work and to maintain reliable error tracking to ensure data management issues are addressed quickly and effectively. These commitments demonstrate that PG&E has taken action to improve its pole clearing program and ensure that pending work to mitigate wildfire ignition risk is completed promptly and to avoid dispatching resources to locations where poles do not exist.

Energy Safety expects PG&E to continue to implement the corrective actions included in the CAP response as it improves the pole clearing program, including adopting standardized vegetation management constraint resolution processes, strengthening and clarifying timelines for completing CCR Title 14 § 1254(c) work, and continuing to mature its pole asset inventory.

Initiative Level Determination

Based on the information provided by PG&E, Energy Safety concluded that PG&E achieved the objective of Initiative 8.2.3.1 Pole Clearing by either completing all work as described in its 2023-2025 WMP or by taking corrective actions to address identified deficiencies. Energy Safety found no outstanding deficiencies in this initiative.

VMA Finding 3- 8.2.3.2 Wood and Slash Management

The purpose of this initiative was to take actions “to manage all downed wood and “slash” generated from vegetation management activities.”³⁹

Summary of Initiative Work Commitments and Identified Deficiencies, PG&E’s CAP Response, and Analysis of CAP Response

In its 2023-2025 WMP, PG&E committed to managing debris less than four inches in diameter that was generated by its vegetation management activities in accordance with applicable regulations and owner preferences, and offer management of larger wood greater than four inches in diameter generated by its vegetation management activities to customers upon request.⁴⁰

Failure to Track Debris Less than Four Inches in Diameter

VMA Summary

During Energy Safety’s initial audit, PG&E provided documentation that wood greater than four inches in diameter was hauled off site or processed on site as requested by property owners in 2024. However, PG&E did not provide documentation that debris less than four inches in diameter was managed as described in PG&E’s 2023-2025 WMP. Therefore, Energy Safety concluded that the initiative 8.2.3.2 Wood and Slash Management was deficient.

PG&E’s CAP Response

In its CAP, PG&E stated that it does not currently track the management of vegetative material less than four inches in diameter.⁴¹ PG&E reiterated its response to comments from Energy Safety’s 2023 Annual Report on Compliance (ARC) and stated that it “does not currently plan to create new fields in [its] database to track the management of vegetative material less than 4 inches in diameter – also referred to as “debris” – or to integrate a tracking requirement into internal procedures.”⁴² PG&E also stated that, “by the end of 2025, PG&E’s VM Quality Control team plans to incorporate wood debris management verification into their quality observations.”⁴³

³⁹ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁴⁰ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 680, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

⁴¹ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 11.

⁴² Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 11.

⁴³ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 11.

CAP Analysis

Energy Safety concluded that PG&E's corrective actions did not adequately address the deficiency identified in the VMA. PG&E did not provide documentation showing that it removed or otherwise managed vegetative material less than four inches in diameter (debris) generated during its vegetation management activities.

Improper debris management can create unnecessary accumulations of ground fuels, increasing both ignition risk and potential wildfire spread. Therefore, PG&E must confirm that all debris produced through its vegetation management activities was managed in a manner that minimizes this risk. PG&E's CAP response did not include plans to verify debris management by field crews. Rather, it incorporates debris management verification into the quality observations performed by its Quality Control team. While this addition to its QA/QC program will improve PG&E's ability to verify that debris is being managed as described in its 2023-2025 WMP, the quality observations will be performed only on a sample of completed tree work locations.⁴⁴ By only sampling a portion of completed work, PG&E cannot verify that wood and slash is being managed for all completed vegetation management work orders.

Initiative Level Determination

PG&E did not provide sufficient documentation to demonstrate that it achieved the objective of Initiative 8.2.3.2 Wood and Slash Management, and the corrective action as described does not satisfy the intent of the initiative. Therefore, Initiative 8.2.3.2 Wood and Slash Management is deficient.

⁴⁴ [Pacific Gas and Electric Company's Response to Energy Safety's 2023 Annual Report on Compliance](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=59169&shareable=true) (August 8, 2025), p. 4. URL: <https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=59169&shareable=true>

VMA Finding 4- 8.2.3.8 Emergency Response of Vegetation Management

The purpose of this initiative was to describe the “planning and execution of vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration.”⁴⁵

Summary of Initiative Work Commitments and Identified Deficiencies, PG&E’s CAP Response, and Analysis of CAP Response

PG&E did not provide sufficient documentation to support that all work commitments pertaining to Initiative 8.2.3.8 Emergency Response of Vegetation Management were completed in 2024. Energy Safety identified deficiencies in the following WMP commitments: Priority Work During Red Flag Warnings and Post-Wildfire Vegetation Management.

Deficiencies Associated with Priority Work During Red Flag Warnings

VMA Summary

In its 2023–2025 WMP, PG&E committed to reviewing and mitigating vegetation identified as pending Priority 2 (P2) work within Red Flag Warning (RFW) areas, consistent with its VM Priority Tag Procedure (TD-7102P-17).⁴⁶ That procedure requires that “Priority 2 tags must be mitigated within 20 business days, unless constrained.”⁴⁷ During Energy Safety’s 2024 VMA, PG&E provided documentation for P2 work orders created in 2024 that were pending in areas subject to an active RFW. The documentation indicated that 988 of 22,998 such P2 work orders (4%) had been pending for more than 20 business days without documented constraints.⁴⁸ Therefore, Energy Safety concluded that the information provided by PG&E did not indicate that PG&E reviewed and mitigated all P2 work in RFW areas as required by its procedure.

PG&E’s CAP Response

In its CAP, PG&E stated that it completed 96% of P2 tags within 20 business days and continues to utilize internal reporting mechanisms to manage P2 trees and their timeliness.⁴⁹ Furthermore, PG&E stated that “while PG&E does not have a process specific to review of P2s

⁴⁵ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, pp. 689-690, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

⁴⁶ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, pp. 689-690, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

⁴⁷ Pacific Gas and Electric Company, VM Priority Tag Procedure (TD-7102P-17).

⁴⁸ Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), p. A-40.

⁴⁹ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 12.

during active Red Flag Warnings (RFW) events outside of the VM Priority Tag Procedure, TD-7102P-17, Rev. 3 includes language regarding evaluation of P2s when Emergency Operation Centers are activated during potential Public Safety Power Shutoff (PSPS) events that may include RFW conditions.”⁵⁰

PG&E stated that it has implemented the following mechanisms to support the timely completion of P2s:

- Priority Tag Analysis Power BI dashboard which contains a P2 Tag Look ahead utilized by VM Regional Managers and Directors on their Daily Operating Reviews (DORs) for discussions with their teams.
- Emails delivered to highlight priority tags that are coming due or are overdue.
- In Weekly Operating Reviews (WOR), the VM operation teams review both P1 and P2 trees that show an overdue work date to determine what caused the delay.^{51 52}

CAP Analysis

Energy Safety analyzed PG&E’s CAP response for the priority work during red flag warnings and concluded that the corrective actions described in PG&E’s CAP were sufficient to address the deficiencies identified in the VMA.

PG&E did not dispute Energy Safety’s finding that it did not complete all P2 conditions in RFW areas as described in its 2023-2025 WMP and 988 trees with P2 conditions were not mitigated ahead of RFW events. PG&E’s VM Priority Tag Procedure, TD-7102P-17, Rev. 3 defines P2 conditions as vegetation that has encroached within PG&E’s minimum clearance requirements or trees with identifiable structural integrity issues that do not meet the criteria for Priority 1 but are likely to strike electrical facilities and may become hazardous before the next scheduled inspection. Completing mitigation work as soon as possible reduces the likelihood that such trees are present during RFW events, when conditions such as high winds and low relative humidity increase risk of ignition. In its CAP, PG&E stated that Revision 3 of its VM Priority Tag Procedure includes language regarding the evaluation of P2 conditions when EOCs are activated, which includes RFWs. PG&E also stated that it has implemented a Power BI dashboard, reminder emails, and weekly meetings to ensure the timely mitigation of trees with P2 status. These actions will improve PG&E’s tracking of priority trees in RFW areas in the future; therefore, Energy Safety concluded that the CAP sufficiently addressed this deficiency.

⁵⁰ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 12.

⁵¹ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 12.

⁵² Pacific Gas and Electric Company, VM Priority Tag Procedure, TD-7102P-17, Rev. 3.

Deficiencies Associated with Post-Wildfire Vegetation Management

VMA Summary

In its 2023–2025 WMP, PG&E committed to performing hazard tree assessments in post-burn areas to address trees that pose a hazard to PG&E’s electric infrastructure.⁵³ PG&E’s Vegetation Management Post-Wildfire Procedure (TD-7114P-01) states that F1 Immediate Priority trees will generally be mitigated within days or weeks of identification. F2 trees are generally mitigated within weeks or months, and F3 trees generally within months.⁵⁴ During Energy Safety’s 2024 VMA, PG&E provided work order records indicating that four of 99 F1 trees (4%) were mitigated between 41 and 134 days after identification. For F2 and F3 trees, 433 of 18,090 (<1%) remained pending mitigation for between 160 and 333 days, with an average of 247 days and median of 248 days. These records indicated that, while PG&E conducted hazard tree assessments in post-wildfire areas, a small subset of identified mitigation work was delayed, and in some cases, not completed at the time of the VMA.

PG&E’s CAP Response

In its CAP, PG&E stated that it completed 97% of work identified through hazard tree inspections.⁵⁵ PG&E also stated that some records submitted during the VMA contained duplicates. After filtering duplicates, 363 F2 and F3 trees remained pending. PG&E reported that, as of October 27, 2025, 160 of these trees had been mitigated, 193 were determined through inspection to require no mitigation, and the remaining 10 were initially constrained but later verified as requiring no work. PG&E also described process improvements, including entering post-wildfire prescribed trees directly into its One VM application for improved visibility and tracking.

CAP Analysis

Energy Safety analyzed PG&E’s CAP responses for post fire vegetation management and concluded that the corrective actions described in PG&E’s CAP were sufficient to address the deficiencies identified in the VMA.

PG&E provided additional documentation in its CAP demonstrating that all post-wildfire hazard trees identified in 2024 were ultimately addressed, either through completed mitigation or verified as requiring no work. After removing duplicate records from the 2024 VMA data using the methodology described by PG&E in its CAP, Energy Safety determined that 19,850 trees were assessed during post-wildfire inspections in 2024. Although some

⁵³ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, pp. 689-690, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

⁵⁴ Pacific Gas and Electric Company, TD-7114P – Post Wildfire Procedure.

⁵⁵ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 13.

mitigation activities exceeded PG&E's generalized internal timeframes, these delays affected only a small fraction of the total trees assessed; therefore, Energy Safety concluded that the delayed work did not detract from PG&E's achievement of the objective of this initiative. Energy Safety also concluded that PG&E's CAP adequately addressed the pending work identified in the VMA, by demonstrating that the work had been completed.

Initiative Level Determination

The purpose of this initiative is to plan for and execute vegetation management in response to emergency situations. For both priority work during red flag warnings and post-wildfire vegetation management work, PG&E's CAP response provided sufficient detail for improvements that will allow PG&E to meet this objective. The objective of this initiative was to plan and execute vegetation activities in response to emergency situations including weather and post-wildfire service restoration. While Energy Safety observed some delays in PG&E's mitigation of post-wildfire hazard trees in 2024, PG&E demonstrated that it conducted vegetation inspections in post-wildfire areas, prescribed mitigation work for hazardous conditions, and ultimately completed all prescribed work, demonstrating that PG&E executed vegetation management activities in response to post-wildfire service restoration in 2024.

Based on the information provided by PG&E, Energy Safety concluded that PG&E achieved the objective of Initiative 8.2.3.8 Emergency Response Vegetation Management by either completing all work described in its 2023-2025 WMP or by taking corrective actions to address identified deficiencies. Energy Safety found no outstanding deficiencies in this initiative.

VMA Finding 5- 8.2.4 Vegetation Management Enterprise System

The purpose of this initiative was to describe the "Operation of and support for centralized vegetation management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work."⁵⁶

Summary of Initiative Work Commitments and Identified Deficiencies, PG&E's CAP Response, and Analysis of CAP Response

PG&E did not provide sufficient documentation to support that all work commitments pertaining to Initiative 8.2.4 Vegetation Management Enterprise System were completed in 2024. Energy Safety determined that PG&E completed commitments associated with record

⁵⁶ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), Published December 2022, p. A-25, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

keeping enhancements associated with its routine and second patrol work and VMOM program, it did not provide documentation to demonstrate that it implemented FTI recordkeeping enhancements.

Deficiencies in FTI Record Keeping

VMA Summary

In its 2023-2025 WMP, PG&E listed a “method of verification” for its FTI Record Keeping Enhancement (VM-21) objective which included digitizing a tree risk assessment form (TRA) and creating a field in its system of record that tracks the reason for tree removals.⁵⁷ In its 2024 ARC, PG&E reported that it completed its FTI record keeping enhancement objective on March 26, 2024.⁵⁸ PG&E provided screenshots of the digitized form.⁵⁹

However, in a data request response on April 22, 2024, PG&E stated “[a]s the [FTI] program has matured, PG&E’s operational approach to FTI was changed to have inspectors fill out a TRAQ form only on those trees likely to fail (either trunk or branch) within the next 15 months and which are accordingly prescribed work.”⁶⁰ This change in operational practice is inconsistent with the VM-21 objective which states that PG&E will “[e]nhance record keeping practices for the Focused Tree Inspection program (FTI) by creating records of all potential strike trees inspected using a digitized Tree Risk Assessment form.”⁶¹ Documentation provided by PG&E indicated that 1,203,745 potential strike trees were inspected under the FTI Program in 2024 and TRA forms were completed and recorded for only 95 (<1%) of those trees.

The objective of VM-21 was to create consistent records of all potential strike trees inspected by the FTI Program using a standard tree risk assessment. The information PG&E provided during Energy Safety’s VMA did not indicate that this was accomplished. Therefore, Energy Safety concluded that this initiative was deficient.

⁵⁷ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 648, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

⁵⁸ Pacific Gas and Electric Company, [Annual Report on Compliance R1 For 2024 Wildfire Mitigation Plan](#), Published April 30, 2025, p. 23, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58691&shareable=true>).

⁵⁹ Data Request OEIS-P-WMP_2024-PG&E-001, Question 1; attachment “2024-PG&E-001_Q001_Atch4-Redacted”

⁶⁰ Data Request OEIS-P-WMP_2024-PG&E-001Rev01, question 1(b); attachment “TN14275_20240621T210958_WMPDiscovery20232025_DR_OEIS_016Q001Rev01,” p. 3.

⁶¹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 648, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

PG&E's CAP Response

In its CAP, PG&E did not dispute Energy Safety's VMA findings and stated that several process improvements were implemented in 2024 and 2025 to increase consistency in how TRA forms are gathered. PG&E provided a timeline of changes and updates made to the FTI process:

- PG&E implemented FTI Procedure, TD-7102P-01-Att07 Revision 1 on 3/24/24.
 - This procedure required all vegetation which has likelihood of impacting PG&E facilities have a Level 2 inspection and a paper TRA form photographed and uploaded.
- PG&E implemented FTI Procedure, TD-7102P-01-Att07 Revision 2 on 4/8/24.
 - This procedure updated the verbiage of inspections to only inspect all strike trees and only perform Level 2 inspection of all strike trees.
 - The instructions to complete and upload a paper TRA form for the strike trees remained
- On 7/24/24, an FTI Bulletin, TD-7102P-01-B041 was released to update the process and procedures for FTI inspectors. This bulletin release occurred prior to the next scheduled revision of the procedure.
 - Within the bulletin, instructions were given to perform Level 2 inspection of all strike trees; however, a TRAQ form should be submitted if the tree had the likelihood of impacting PG&E facilities within in the next 15 months, and was prescribed one of the following prescription types: Felled Tree, Targeted Prune, or Major Dismantle.
 - For all other prescriptions, Aerial Pruning, Maintenance, Brush, and No Work, the inspectors were not required to submit a Tree Risk Assessment form.
- PG&E implemented TD-7102P-01-Att07 Revision 3 on 4/28/25. This is the current version (as of publication of this VMA Report) and captures the instructions from the bulletin released in 2024, as well as updated language stating that a TRA form must be submitted if any trees may fall in or otherwise impact PG&E electric facilities.⁶²

PG&E also stated that in 2024, inspectors were required to attach a TRA form to the record of trees listed for work. PG&E provided documentation showing a sample population of 166,539 tree records with photos of the TRA forms uploaded.⁶³

Further, PG&E stated that:

In 2025, an internal guidance document was released via VM Program Communications on 2/20/25 stating that the paper upload of Tree Risk Assessment forms would no longer be accepted as we had completed the digital enhancement to have the Tree Risk

⁶² Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), pp. 14-15.

⁶³ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 15.

Assessment form available within the One VM application in 2024. However, instructions were not provided to move fully digital until February 2025. In 2024, there were 229 digital TRAQ forms completed, which can be identified [...] on the original submitted supporting documents. The move to digital completion of the Tree Risk Assessment forms removes the need for inspectors to physically fill out a paper form that they would then need to photograph and upload which results in an improvement for record keeping.⁶⁴

CAP Analysis

Energy Safety concluded that PG&E's CAP demonstrated that overall improvements were made to PG&E's vegetation management enterprise system in 2024 in line with the objective of Initiative 8.2.4 Vegetation Management Enterprise System.

The information provided in PG&E's CAP indicated that procedures existed in 2024 to capture TRA records for some trees inspected under the FTI program, including both paper-based and digital forms. The CAP information also clarified that the documentation PG&E provided to Energy Safety for the VMA showing that TRA forms were completed and recorded for only 95 trees, reflected only the number of digital TRA forms and did not include paper forms that were photographed and uploaded.⁶⁵ Further, PG&E's transition in 2025 to exclusively digital TRA forms improved the efficiency and consistency of recordkeeping for those assessments.

Initiative Level Determination

In its 2023-2025 WMP, PG&E committed to enhancing its recordkeeping for its Routine Patrol, Second Patrol, Vegetation Management for Operational Mitigations, TRI, and FTI programs by creating the capability in its vegetation management applications to document factors used when prescribing trees for removal. PG&E provided information during the 2024 VMA which indicated that a "Reason for Removal" field was added to its vegetation management applications which supported the documentation of removal reasons for each of these programs during the 2024 inspection cycle.

As a result, PG&E demonstrated that it enhanced the overall capabilities of its enterprise system. Additionally, in its 2026-2028 WMP, which was approved by Energy Safety on February 5, 2026, PG&E stated that it will be consolidating its FTI program starting in 2026 and is in the process of evaluating which components of FTI will be incorporated into PG&E's Distribution Routine Patrol Program.⁶⁶ This decision was effectuated in part by Energy

⁶⁴ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 15.

⁶⁵ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 15.

⁶⁶ Pacific Gas and Electric Company, [2026-2028 Base WMP](#), Published December 30, 2025, p. 369, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60012&shareable=true>).

Safety's requirement set in its Decision on PG&E 2023-2025 Base WMP, for PG&E to simplify its vegetation management programs to reduce overlapping scope.⁶⁷

PG&E has improved its vegetation management enterprise systems by documenting the reasons for tree removals prescribed by its inspection programs, switching to the use of entirely digital TRA forms under its FTI program, and by consolidating its vegetation management programs to reduce overlapping scope. In consideration of these improvements, Energy Safety concluded that PG&E achieved the objective of Initiative 8.2.4 Vegetation Management Enterprise system.

VMA Finding 6. 8.2.6 Open Work Orders

The purpose of this initiative was to describe the “Actions taken to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.”⁶⁸

Summary of Initiative Work Commitments and Identified Deficiencies and PG&E’s CAP Response

PG&E did not provide sufficient documentation to support that all work commitments pertaining to Initiative 8.2.6 Open Work Orders were completed in 2024. Energy Safety determined all work was not completed within the timeframes designated in the WMP for Priority 1 trees, Priority 2 trees, mitigations prescribed during Second Patrol Inspections for dead or dying trees, and non-priority mitigations prescribed during Distribution Vegetation Management Inspections.

Delays in work order completion affected several of PG&E’s vegetation management programs in 2024. Each of these deficiencies is described below along with PG&E’s CAP response which provided updates to the work order backlog specific to those programs. Because the same underlying issues affect each of these programs and PG&E provided similar corrective actions in its CAP for each program, Energy Safety’s analysis of PG&E’s CAP response as it relates to PG&E’s management of 2024 vegetation management work orders is combined into a single analysis section below.

⁶⁷ Office of Energy Infrastructure Safety, [Decision on PG&E 2026-2028 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60177&shareable=true), Published February 5, 2026, pp. 110-111, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60177&shareable=true).

⁶⁸ Office of Energy Infrastructure Safety, 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines, Published December 2022, p. A-25, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

Overdue Priority 1 Work Orders

VMA Summary

In its 2023-2025 WMP, PG&E committed to mitigating trees with Priority 1 conditions within 24 hours of identification as long as conditions are safe for the tree crew to proceed with work. PG&E did not specify any exceptions for weekends, holidays, or other non-working periods.⁶⁹ PG&E provided documentation demonstrating that 10,451 of 10,603 P1 trees identified in 2024 (99%) were mitigated within 24 hours of identification, while 152 trees (1%) were mitigated between 1 and 232 days after inspection.⁷⁰ Of these 152 trees, mitigation on 40 trees occurred over weekends or holidays, and 6 were mitigated more than 24 hours but less than 2 days after inspection. PG&E did not count these 46 trees as “overdue” during the VMA. Of the 152 trees identified in PG&E’s 2024 P1 work order records as exceeding the 24-hour timeframe, PG&E provided explanations and supporting documentation for 106.⁷¹

PG&E’s CAP Response

In its CAP, PG&E initially stated that it disagreed with Energy Safety’s finding and asserted that 99.9% of P1 work orders were completed on time. PG&E sent a follow-up email to Energy Safety on January 16, 2026, which revised some of the information contained in its CAP.⁷² In that email, PG&E stated that, after reanalyzing its documentation, it agreed with Energy Safety’s determination in the VMA that PG&E’s records indicated that 152 P1 trees were mitigated over 24 hours after identification. PG&E provided additional documentation in this email containing explanation for why mitigation work on some of those trees appeared delayed in its system of record. This documentation as well as documentation already reviewed by Energy Safety during the VMA indicated that mitigation work for all but three of those 152 trees were mitigated within 24 hours, but that either data entry errors resulted in mitigation dates recorded later than the actual completion dates, or external factors created unsafe conditions for tree crews to execute the work within 24 hours of identification. The documentation indicated that only four of the 152 trees that appeared delayed in PG&E’s system of record could be attributed to a non-safety-related delay. Of these four trees, three trees were delayed due to “communication issues resulting in a delay in getting tree crews dispatched to site,” and one tree was initially misidentified, and tree crews worked a nearby P2 tree instead of the subject P1 tree in error.⁷³

⁶⁹ Pacific Gas and Electric Company, 2023-2025 Base Wildfire Mitigation Plan, Published June 7, 2024, p. 689, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

⁷⁰ Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), pp. A-56 to A-57.

⁷¹ Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), pp. A-56 to A-57.

⁷² Attachment “Energy Safety Follow Up 2 (Q1-Q5)” provided in email from PG&E on January 16, 2026.

⁷³ Attachment “Energy Safety Follow Up 2 (Q1-Q5)” provided in email from PG&E on January 16, 2026; Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), pp. A-56 to A-57.

PG&E stated that it believes its existing procedure accounts for work identified prior to weekends, holidays, or other non-working periods. PG&E cited Section 2.1.2 of Utility Procedure: TD-7102P-17, Rev. 2, stating an employee or contractor must remain on site if there are delays due to unsafe conditions such as the need to schedule electric crew to deenergize nearby facilities for safety.

Overdue Priority 2 Work Orders

VMA Summary

In its 2023-2025 WMP, PG&E committed to mitigating trees with identified P2 conditions within 20 business days unless mitigation work was constrained by an external factor. If mitigation work is constrained, the 20-business day timeframe was applied starting on the date that the constraint was resolved.⁷⁴ PG&E provided documentation demonstrating that mitigation work for 5,166 of the 116,119 trees (4%) identified with P2 conditions in 2024 either exceeded PG&E's required mitigation timeframe or remained incomplete at the time of the 2024 VMA data submission.⁷⁵

PG&E's CAP Response

In its CAP, PG&E stated that of the 2,805 P2 trees Energy Safety identified as still pending mitigation, mitigation work has been completed or de-escalated for 2,539 of those trees (91%).⁷⁶ PG&E also provided status updates for each of the 2,805 trees with incomplete mitigation identified during the 2024 VMA, along with information on the timeliness of its mitigation efforts for all 116,119 P2 trees identified by PG&E in 2024, summarized in the table below.

⁷⁴ Pacific Gas and Electric Company, 2023-2025 Base Wildfire Mitigation Plan, Published June 7, 2024, p. 706, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

⁷⁵ Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), pp. A-54 to A-55.

⁷⁶ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 16.

Timeliness Status	Number of Trees
Work completed on time- Mitigation work completed within 20 business days of work being prescribed	96,898 (83%)
Work completed on time- Mitigation work completed more than 20 business days of work being prescribed due to constraint, but mitigated within 20 business days of constraint being resolved	15,442 (13%)
Work Completed but Timeline Exceeded- Mitigation work completed more than 20 business days of work being prescribed or more than 20 business days from constraints being resolved	2,415 (2%)
Work incomplete but not overdue- due date has not elapsed but mitigation work still pending	34 (<1%)
Work incomplete but constrained- Work pending due to active constraint	244 (<1%)
Work De-escalated- Work changed to no work code or de-escalated from P2 to Routine priority	1,086 (<1%)

In a supplemental response to PG&E’s CAP, PG&E provided documentation which indicated that of the 2,415 trees that were not completed within PG&E’s targeted timeframe:

- 1,746 were impacted by additional constraints
- 427 were completed late by tree crews
- 227 appear late due to data entry errors
- 15 were worked on different programs and closed out 'late' due to data clean-up efforts⁷⁷

Overdue Second Patrol Work Orders

VMA Summary

In its 2023–2025 WMP, PG&E committed to completing dead and dying tree work identified through its Second Patrol Program within 180 days in the High Fire Threat District (HFTD) and within 365 days in non-HFTD.⁷⁸ PG&E provided documentation demonstrating that 16%

⁷⁷ Data Request OEIS-E-VMA_2026-PG&E-001, Question 1; attachment “PGE_E-VMA_2026_20260306_Response.pdf.”

⁷⁸ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://www.pge.com/~/media/2024/06/2023-2025_Base_Wildfire_Mitigation_Plan.pdf), Published June 7, 2024, p. 667, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

(19,009 out of 116,726 trees) were completed outside the timeframes committed to in the WMP, and a further 5,164 (4%) were still pending but not overdue at the time of the VMA.⁷⁹

PG&E's CAP Response

In its CAP, PG&E provided an update on the trees for which Energy Safety either identified work was overdue or work that was still pending but not yet overdue. PG&E stated 14,875 tree units (84%) have been completed out of the 17,786 trees referenced in the VMA.⁸⁰ PG&E stated that “Plans are under development to address the remaining 2,911 (16%) trees that have not been worked.”⁸¹

PG&E also stated that “[a]s noted in the WMP, completion of identified work can be subject to external factors, which represent reasonable circumstances that may impact execution against targets including, but not limited to, physical conditions, landholder refusals, environmental delays, customer refusals or non-contacts, permitting delays/restrictions, weather conditions, removed or destroyed assets, active wildfire, exceptions or exemptions to regulatory/statutory requirements, and other safety considerations.”⁸²

Non-Priority Tree Work Prescribed During Distribution Inspections

VMA Summary

In its 2023-2025 WMP, PG&E committed to completing non-priority tree work prescribed during the 2024 distribution inspection cycle within one year of identification unless a constraint or external factor was documented, in accordance with PG&E's updated Distribution Vegetation Management Program Standard (TD-7102S 4/20/23).⁸³ PG&E provided documentation demonstrating that it did not complete vegetation management work within a one year timeframe on 8,288 out of 986,311 (1%) trees that were prescribed vegetation management work by its distribution vegetation management programs in 2024.⁸⁴ While the percentage of incomplete work is small, Energy Safety encourages PG&E to continue to mitigate all prescribed tree work as quickly as possible and to continue to document and resolve constraints as timely as possible to reduce risk.

⁷⁹ Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), pp. A-54 to A-55.

⁸⁰ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), pp. 19-20.

⁸¹ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 19.

⁸² Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 19.

⁸³ Pacific Gas and Electric Company, 2023-2025 Base Wildfire Mitigation Plan, Published June 7, 2024, p. 639, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

⁸⁴ Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), pp. A-54 to A-55.

PG&E's CAP Response

In its CAP, PG&E provided an update on the trees for which Energy Safety identified were overdue and still pending. PG&E confirmed that 99.2% of the tree work was completed within one year. Of the 6,694 trees that were not completed within a year and were still pending in the VMA, PG&E completed mitigation work on 3,711 trees (55%), 1,095 required no work (16%), 1,372 remain constrained (20%), and 503 trees are pending work following the resolution of prior constraints (8%).

In a supplemental response to PG&E's CAP, PG&E provided documentation which indicated why each of the 1,594 trees identified as completed one year after inspection in the VMA were delayed. The documentation indicated that 1,180 of the 1,594 (74%) trees completed after one year were delayed due to external constraints including environmental and agency permitting requirements, customer refusals or the need to deenergize lines near the mitigation work for tree crew safety. The remaining 414 delayed trees were not impacted by constraints.

As with the Second Patrol dead or dying delayed work, PG&E stated that completion of prescribed mitigation work is subject to external factors, which represent reasonable circumstances that may impact execution against targets. As stated above, Energy Safety encourages PG&E to continue to mitigate all prescribed tree work as quickly as possible and to document and resolve constraints quickly to eliminate risk on the system.

NERC Work Orders

VMA Summary

In its 2023-2025 WMP, PG&E committed to completing 100 percent of tree work identified by its 2024 Routine Transmission North American Electric Reliability Corporation (NERC) inspections by December 31, 2024.”⁸⁵ During Energy Safety's initial audit, PG&E provided documentation which indicated that out of 14,172 trees that were prescribed work by the program in 2024, 55 (<1%) had work completed in 2025 and 115 (<1%) were still pending work.⁸⁶ Based on this information, Energy Safety concluded that this work commitment was deficient.

PG&E's CAP Response

In its CAP, PG&E provided additional documentation regarding the 170 work orders identified by Energy Safety in the VMA as completed after December 31, 2024 or were pending. This

⁸⁵ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 655, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

⁸⁶ Data Request OEIS-E-SVM_2025-PG&E-03, question 3; attachment "DRU15478_Q003_Atch01_ROE2 VMS Inspection Report (FY VM25).xlsx.

documentation demonstrated that of the 55 trees marked as completed in 2025, 53 were incorrectly identified as NERC trees and two trees were duplicates of records worked in both 2024 and 2025. Of the 115 trees that had N/A listed for the tree work date, 68 required no work, 6 have received work, and 41 are constrained.⁸⁷

In addition to each of the CAP actions described above, PG&E also included that the following mechanisms are in place to promote timely completion of all work orders:

- Priority 1 and Priority 2 Work Orders:
 - PG&E monitors the status and projected completion dates of all open P1 and P2 tree work orders during Daily Operating Reviews (DORs) using a dashboard system. DOR meetings occur at senior leadership levels to maintain visibility of priorities and align on daily outcomes. Work orders exceeding standard mitigation timelines are escalated for resolution during these meetings.
 - In Weekly Operating Reviews (WOR), the VM operation teams review both P1 and P2 trees that show an untimely work date to determine what caused the delay in completion of the prescribed work.
- PG&E will be implementing recordkeeping enhancements to improve traceability and subsequent validation of the appropriate mitigation timeline.⁸⁸
- PG&E will set a requirement moving forward to utilize an application (Signal app) for communication and tracking of P1 work orders to avoid delays.⁸⁹
- Second Patrol Work Orders:
- PG&E incorporated a metric for dead or dying trees into Vegetation Management's DOR meetings.⁹⁰
- Non-Priority Tree Work Prescribed During Distribution Inspections:

PG&E incorporated a metric of aging units into Vegetation Management's DOR meetings.⁹¹

CAP Analysis- Open Work Orders

Energy Safety concluded that PG&E's CAP response demonstrated that PG&E adequately implemented its procedures as described in its 2023-2025 WMP for open work orders, and that deficiencies in PG&E's delayed completion of vegetation management work orders were

⁸⁷ Pacific Gas and Electric Company, 2024 WMP Vegetation Management Audit Corrective Action Plan, November 14, 2025, p. 23.

⁸⁸ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 18.

⁸⁹ Pacific Gas and Electric Company, Energy Safety Follow Up 2 (Q1-Q5); attachment 46 P1s (Redacted).zip.

⁹⁰ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 20.

⁹¹ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 22.

sufficiently addressed. Therefore, PG&E met the objective of Initiative 8.2.6 Open Work Orders to manage open vegetation-management work orders identified through inspection activities.

PG&E demonstrated that it utilized multiple vegetation inspection programs in 2024 to identify and prescribe mitigation work for vegetation that could create wildfire risk through contact with energized equipment. PG&E also demonstrated that it completed mitigation work for the majority of the prescribed work within the timeframes described in its WMP. In consideration of the additional information provided in PG&E's CAP, Energy Safety concluded that PG&E adequately implemented its procedures by demonstrating that nearly all work delays identified during the VMA were the result of external constraints, and that PG&E has made progress in completing the delayed work identified during the VMA. However, Energy Safety expects PG&E to continue maturing its vegetation management programs so that external constraints are accurately documented and resolved as rapidly as possible, and "No Work Reviews" are completed in a timely manner.

While Energy Safety recognizes that nearly all delayed work was the result of external constraints, a percentage of work orders associated with each of PG&E's inspection programs, particularly those associated with the Second Patrol Program, exceeded the risk-based timeframes. Work orders associated with Second Patrol indicated that 4,579 dead or dying trees located in High Fire Threat Districts (HFTD) with strike potential to PG&E's electrical infrastructure remained unmitigated as of November 14, 2025. These trees had been pending mitigation for between 318 and 682 days, with an average of 461 days. In addition, 666 dead or dying trees located in non-HFTD areas had been pending mitigation for between 318 and 672 days, with an average of 503 days as of November 14, 2025.

In addition, the documentation PG&E provided demonstrated that PG&E only counts the start of the timeframe for P2 work orders when constraints that impeded the work have been resolved which can skew the timeframes. In some instances, P2 work orders have been constrained for periods that exceed the risk-based timeframes. For example, 15,442 of the 116,119 P2 trees identified in 2024 (13%) were documented as complete within mitigation timeframes only because the timeframe started when the constraint was resolved rather than when the work was prescribed during the inspection. This gives a false sense that the work was completed during the mitigation timeframe. For example, some trees were mitigated 335 business days after identification, with an average duration of 74 business days, well beyond the timeframe of 20 business days. In addition, due to constraints including agency permitting requirements, customer refusals, and access limitations, 19,377 of the 116,726 (16%) dead or dying trees identified by PG&E's 2024 Distribution Second Patrol program as posing an increased risk of failing onto PG&E's electrical infrastructure were not mitigated within PG&E's targeted timeframes. Energy Safety accepts that work constraints may delay the completion of some work and encourages PG&E to continue to document and resolve such constraints as rapidly as possible to continue to reduce wildfire risk.

To improve its response time for work orders, PG&E stated that it has implemented improved tracking practices in its daily and weekly meetings with management and contractors to ensure that work is completed within the timeframes it committed to in its WMP. Energy Safety concluded that this will allow PG&E to continue to improve addressing open work orders. Energy Safety also expects continued improvements in the accuracy of mitigation records, as data entry errors in 2024 contributed to the appearance of delayed mitigation.

Initiative Level Determination

The objective of this initiative was to manage open work orders resulting from inspections that prescribe vegetation management activities. PG&E has demonstrated that the majority of work orders were completed within its targeted mitigation timeframes, that it has continued to work through completing its work order backlog, and that external constraints affecting the completion of the remaining pending work have been documented and tracked in PG&E's system of record.

Based on the information provided by PG&E, Energy Safety concluded that PG&E achieved the objective of Initiative 8.2.6 Open Work Orders by either completing all of the work as described in its 2023-2025 WMP or by taking corrective actions to address identified deficiencies. Energy Safety found no outstanding deficiencies in this initiative.

VMA Findings 7- 8.2.7 Workforce Planning

The purpose of this initiative was to describe “Programs to ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work.”⁹²

Summary of Initiative Work Commitments and Identified Deficiencies, PG&E's CAP Response, and Analysis of CAP Response

PG&E did not provide sufficient documentation to support that all work commitments pertaining to Initiative 8.2.7 Workforce Planning were completed in 2024. Energy Safety determined that PG&E did not complete all work associated with its Vegetation Management Inspector training requirements and its FTI Inspector certification requirements.

⁹² Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), Published December 2022, p. A-26, URL: (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

Deficiencies in Vegetation Management Inspector Training Requirements

VMA Summary

In its 2023–2025 WMP, PG&E committed to using completion of the “Vegetation Management Inspector (VMI) Basics” training courses to ensure that contractors meet minimum qualification requirements before performing field work. PG&E stated that, prior to the implementation and rollout of the VMI Basics courses in 2024, individuals were required to complete VEGM-0110, the final skill assessment required to pass VMI Basics training, before receiving production access to the vegetation management software. PG&E further stated that this requirement is now obsolete, and that contractors may now receive One VM production access upon completion of One VM training, which is separate from the VMI Basics courses and allows contractors to prescribe work in the field.⁹³ PG&E provided documentation containing training records for vegetation management contractor staff onboarded in 2024. The file indicated that nine of the 624 contracted VMIs (1%) received One VM production access without completing the required One VM application training. Therefore, Energy Safety concluded that this work commitment was deficient.

PG&E’s CAP Response

In its CAP, PG&E confirmed that 99% of VMIs completed the OneVM training prior to receiving production access. Regarding the nine VMIs granted OneVM production access prior to meeting the minimum qualifications, PG&E stated that eight VMIs have since completed the training and one VMI is no longer a contractor with PG&E.

PG&E stated that it employed multiple methods that inform contractors of the required trainings, and stated that “[t]he One VM Information Hub on the VM SharePoint site outlines the steps for accessing both the sandbox training environment and the One VM Production system. The One VM Hub further clarifies what courses must be completed by job role. The One VM Production Access User Request Form also reminds users that training must be completed before access is provided.”⁹⁴

As a corrective action, PG&E stated that it plans to conduct annual audits of completion of One VM training and basic curriculum courses for VMI Personnel beginning in 2026.⁹⁵

CAP Analysis

Energy Safety concluded that PG&E’s CAP demonstrated that deficiencies in the vegetation management inspector training requirements were sufficiently addressed.

⁹³ Data Request OEIS-E-SVM_2025-PG&E-03, question 59; attachment "DRU15478_Audit_DR_OEIS_D001.pdf," p. 29.

⁹⁴ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 24.

⁹⁵ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 24.

PG&E's CAP indicated that PG&E has taken corrective action by ensuring that the nine VMI identified by Energy Safety during the 2024 VMA completed required training in 2025. PG&E demonstrated that it communicates training requirements to staff and contractors and plans to conduct annual staff audits to verify One VM training completion starting in 2026.

Deficiencies in FTI Inspector Certification Requirements

VMA Summary

In its 2023-2025 WMP, PG&E stated that it planned to have all FTI inspections performed by TRAQ certified arborists.⁹⁶ During Energy Safety's 2024 VMA, PG&E provided documentation which indicated that two out of 468 VMIs that performed FTI inspections in 2024 did not have documentation of being TRAQ certified arborists and therefore Energy Safety concluded that this commitment was deficient.

PG&E's CAP Response

In its CAP, PG&E stated that it disagrees with Energy Safety's finding and that the two incomplete VMI profiles were demo profiles created for system testing purposes.⁹⁷ PG&E provided screenshots showing that the inspector's emails were "noreply@its-training.com," and that the profiles were not utilized for inspecting or prescribing any work in 2024. PG&E also stated that in re-analyzing the data, it identified two additional inspectors that were also demo profiles used solely for system testing purposes. PG&E also stated that it has established a process to send out notifications to FTI inspectors with certifications that are expiring or have expired.⁹⁸

CAP Analysis

Energy Safety concluded that PG&E's CAP sufficiently addressed the deficiencies associated with FTI inspector certifications. The additional information provided in PG&E's CAP indicated that 100% of VMIs who performed inspections under the FTI program in 2024 were TRAQ-certified arborists.

Initiative Level Determination

The objective of this initiative was to ensure a qualified vegetation management workforce. Energy Safety concluded that PG&E's CAP response demonstrated that PG&E adequately implemented its procedures as described in its 2023-2025 WMP for training requirements.

⁹⁶ PG&E, [2023-2025 Base Wildfire Mitigation Plan Revision 4-1](#), Published June 7, 2024, p. 644, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

⁹⁷ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), pp. 24-25.

⁹⁸ Pacific Gas and Electric Company, 2024 VMA CAP (November 14, 2025), ([Appendix 2](#)), p. 24.

Based on the information provided by PG&E, Energy Safety concluded that PG&E achieved the objective of initiative 8.2.7 Workforce Planning by either completing all work described in its 2023-2025 WMP or by taking corrective actions to address identified deficiencies. Energy Safety found no outstanding deficiencies in this initiative.

3. PG&E'S 2024 VM PROGRAMMATIC PERFORMANCE ASSESSMENT

3.1 Performance Assessment of PG&E's VM Program

The programmatic assessment is an evaluation of PG&E's VM program maturity. Energy Safety considers PG&E's year-over-year progress in achieving VM objectives, and whether PG&E has implemented the corrective actions as described in CAP responses from previous performance periods. Energy Safety also evaluates the totality of the vegetation management work and initiative level analysis conclusions to determine whether PG&E completed sufficient work in all initiatives within its vegetation management program to meet the stated objectives of the WMP and minimize the risk of catastrophic wildfire posed by electrical lines and equipment.

3.2 2024 VM programmatic level performance analysis

Energy Safety's VMA, dated October 14, 2025, found that PG&E completed all work in six of the 13 initiatives in its 2023-2025 WMP and was deficient in seven. Of the seven deficient initiatives identified in the VMA, the CAP sufficiently addressed six of the deficiencies by providing additional documentation to demonstrate that either all work was completed or that PG&E has developed corrective actions to address the deficiencies. However, PG&E did not provide adequate corrective actions to address the deficiency identified in one initiative: 8.2.3.2 Wood and Slash Management.

PG&E has begun implementing corrective actions to address deficiencies in delayed response times to mitigation work as well as record keeping and documentation issues identified in both Energy Safety's 2024 VMA, as well as previous VM audits. Overall, PG&E has made improvements to its vegetation management programs as discussed below and has addressed the majority of the deficiencies identified in the VMA, with the exception of Wood and Slash Management.

Wood and Slash Management Record Keeping Deficiency. Energy Safety identified deficiencies in PG&E’s tracking of debris generated by its vegetation management activities that is less than four inches in diameter, referred to as debris, in both 2023 and 2024.⁹⁹ In both years, PG&E did not provide documentation to support that debris generated by its vegetation management activities was managed as described in its 2023-2025 WMP. Because the improper management of debris can increase ground fuels, thereby increasing ignition and wildfire spread potential, it is important for PG&E to keep accurate records of these activities for verification that associated risk is being mitigated. As part of its 2024 CAP response, PG&E stated that in response to Energy Safety’s feedback during past VMAs, its Quality Control team plans to incorporate debris management verification into their quality observations by the end of 2025. This action demonstrates that PG&E has begun to mature its record keeping in response to feedback provided in previous audit cycles. However, because PG&E’s corrective actions will only verify a sample of completed work, PG&E will still be unable to verify that wood and slash will be managed for all completed vegetation management work orders and therefore, Energy Safety concluded that PG&E’s record keeping of these activities still has room for improvement, and that PG&E’s corrective actions were inadequate in addressing the deficiency.

Improvements in Tracking Delayed Work Orders. Energy Safety has identified year-over-year delays in PG&E’s completion of mitigation work orders within timelines described in the WMP. In response, PG&E has begun to implement improvements to better track its open work orders. During performance years 2022, 2023 and 2024, PG&E was unable to meet its mitigation timeframes for dead or dying trees identified by its Distribution Second Patrol program.¹⁰⁰ PG&E was also unable to meet mitigation timeframes for all P2 work orders identified in both 2023¹⁰¹ and 2024.¹⁰² PG&E has cited work constraints such as agency permitting requirements, customer refusals, and access issues as the reasons for much of these delays. Delays were also attributed to data entry errors and apparent miscommunications in work completed by different VM Programs.¹⁰³

⁹⁹ Office of Energy Infrastructure Safety, [2023 SVM Audit of PG&E](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (February 18, 2025), p. A-24, URL: <https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true>; Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), pp. A-29 to A-30.

¹⁰⁰ Office of Energy Infrastructure Safety, [2022 SVM Audit Report of PG&E](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57509&shareable=true) (October 11, 2024), p. 8, URL: <https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57509&shareable=true>; Office of Energy Infrastructure Safety, [2023 SVM Audit Report of PG&E](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58780&shareable=true) (June 25, 2025), p. 30, URL: <https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58780&shareable=true>; Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), p. A-58.

¹⁰¹ Office of Energy Infrastructure Safety, [2023 SVM Audit Report of PG&E](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58780&shareable=true) (June 25, 2025), p. 26, URL: <https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58780&shareable=true>

¹⁰² Data Request OEIS-E-VMA_2026-PG&E-001, Question 1; attachment “PGE_E-VMA_2026_20260306_Response.pdf.”

¹⁰³ Data Request OEIS-E-VMA_2026-PG&E-001, Question 1; attachment “PGE_E-VMA_2026_20260306_Response.pdf.”

PG&E stated that it has improved its tracking of overdue work orders through the use of Power BI dashboards and daily emails to highlight mitigation work that is approaching or past due, and that senior leadership conducts daily and weekly operating reviews to prioritize work orders and identify causes of delay. PG&E also achieved its 2023 constraint resolution procedural guideline objective (VM-09) by publishing procedural guidelines addressing major constraint categories identified in the 2023–2025 WMP, including customer, environmental, and permitting constraints.¹⁰⁴ These actions indicate that PG&E has taken steps to improve its response time for completing identified mitigation work orders.

In addition to delays in clearance and fall-in mitigation work, Energy Safety also identified delays in completing mitigation work identified under PG&E's pole clearing program. PG&E committed to corrective actions that will clarify expectations for completing work identified that is in line with CCR Title 14, Section 1254(c), and aligning its pole clearing constraints resolution procedures with its other vegetation management programs to more effectively resolve work constraints and complete pending work to reduce wildfire ignition risk in a timely manner. Energy Safety concluded that these commitments adequately address the deficiencies identified in the VMA and will improve PG&E's response time for completing mitigation work identified by its pole clearing program.

Improvements in Record Keeping. PG&E has also begun implementing improvements to address deficiencies Energy Safety has identified in PG&E's recordkeeping practices which have inhibited PG&E's ability to verify work was completed as described in its WMP. Energy Safety concluded that these improvements will further improve the completeness and accuracy of PG&E's vegetation management records.

Energy Safety identified inconsistencies in PG&E's recordkeeping for its Distribution Routine and Second Patrol inspection programs in 2024. Although PG&E committed to tracking progress toward its inspection targets using circuit miles, it stated during the 2024 VMA that it tracked progress in 2024 using span miles. In its 2024 CAP response, PG&E provided additional information explaining why span miles was a more effective unit of measure for establishment and tracking of these targets. Based on the information provided in PG&E's 2024 CAP, Energy Safety agrees with PG&E's use of span miles in establishment and tracking for these targets and concludes that it is a more accurate unit of measure to track progress towards these targets than circuit miles. PG&E has updated the unit of measure for its Distribution Routine Patrol Program and Distribution Second Patrol Program (referred to as Hazard Patrol in 2026) inspection targets in its 2026–2028 WMP to span miles.¹⁰⁵ Energy Safety concluded that these updates address the deficiency identified in the 2024 VMA and will

¹⁰⁴ Office of Energy Infrastructure Safety, [2023 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true) (February 18, 2025), p. A-53, URL: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57987&shareable=true>.

¹⁰⁵ Pacific Gas and Electric Company, [2026-2028 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60012&shareable=true), Published December 30, 2025, p. 362, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60012&shareable=true>).

provide more accurate data regarding PG&E's annual attainment of these targets moving forward.

Regarding recordkeeping deficiencies identified in the 2024 VMA related to documentation of Level 2 inspections in support of PG&E's FTI inspection target (VM-03), the information provided in PG&E's 2024 CAP indicated that it made process improvements in 2024 to better document the completion of Level 2 inspections completed under its FTI program. Energy Safety agrees that these improvements will increase accuracy of PG&E's data and will continue to monitor PG&E's progress. Further, PG&E has demonstrated maturity in its vegetation management programs by consolidating its FTI program into its Distribution Routine Patrol Program based on Energy Safety feedback in an effort to simplify its vegetation management programs to reduce overlapping scope.

Improvements to Workforce Planning. Energy Safety has also identified deficiencies in PG&E's 8.2.7 Workforce Planning Initiative in both 2023 and 2024. In both performance years, PG&E's Vegetation Management Inspectors (VMI) began performing vegetation management inspections or were granted access to software which enabled them to begin inspection work before satisfying all required training requirements.¹⁰⁶ In its 2023 CAP, PG&E stated that it implemented profiled trainings in 2024, which automatically assigns trainings based on contractor roles, and that once trainings are profiled, users will have a defined time to take and complete courses.¹⁰⁷ Despite this improvement to its record keeping of training records, in 2024, nine out of 624 (1%) VMI's were granted One VM Production access, which enables VMIs to begin prescribing work in the field, prior to completing all required training. In its 2024 CAP, PG&E committed to completing Annual Audits of Completion of One VM Training and Basic Curriculum courses for VMI Personnel beginning in 2026 and has included this commitment in its 2026-2028 WMP. Energy Safety concluded that implementing these audits will strengthen PG&E's training program and adequately addresses the deficiency identified in the VMA.

Overall, PG&E has completed the majority of the vegetation management work in its 2023-2025 WMP. PG&E implemented nine vegetation inspection programs in 2024 that covered its entire Transmission and Distribution systems and duplicated inspections in higher risk areas of its service territory. Although constraints prohibited PG&E from mitigating a proportion of the work identified by those inspections within the targeted timeframes described in its 2023-2025 WMP, the information provided in PG&E's CAP indicated that it is tracking the pending work and is continuing to make progress to timely resolve constraints and complete pending 2024 work. Energy Safety understands constraints will occur and expects PG&E will continue

¹⁰⁶ Office of Energy Infrastructure Safety, [2023 SVM Audit Report of PG&E](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58780&shareable=true) (June 25, 2025), pp. 27-28, URL: <https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58780&shareable=true>; Office of Energy Infrastructure Safety, 2024 VMA of PG&E (October 14, 2025), ([Appendix 1](#)), p. A-64

¹⁰⁷ Pacific Gas and Electric Company, [2023 SVM Audit CAP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true) (March 20, 2025), p. 13, URL: <https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58133&shareable=true>.

to document all constraints and provide Energy Safety documentation as requested. PG&E has also committed to corrective actions in its CAP to enhance its record keeping of vegetation management work and address the record keeping deficiencies identified in the 2024 VMA, both of which will continue to improve program performance. Energy Safety will continue to monitor progress on programmatic performance in PG&E's 2025 audit cycle.

4. CONCLUSION

Based upon the analysis discussed in Sections 2 and 3, Energy Safety concludes that PG&E has made year-over-year improvements in its vegetation management programs and has successfully achieved the objectives of 12 of the 13 vegetation management initiatives within its 2024 vegetation management program. Energy Safety has identified an outstanding deficiency in one initiative within PG&E's vegetation management program: 8.2.3.2 Wood and Slash Management.

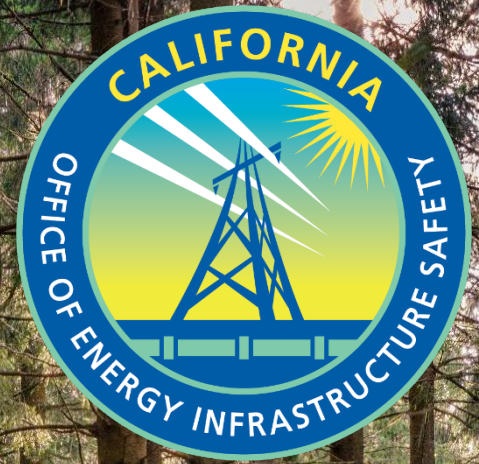
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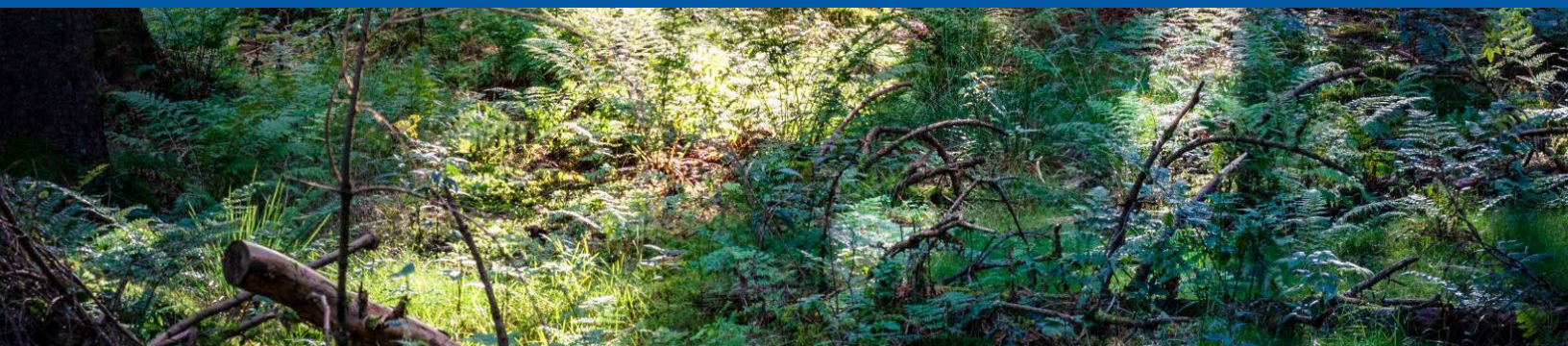
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A California Natural Resources Agency
www.energysafety.ca.gov

715 P Street, 15th Floor
Sacramento, CA 95814
916.902.6000





APPENDIX 1. Pacific Gas and Electric Company 2024 Vegetation Management Audit



APPENDIX DESCRIPTION

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), Energy Safety may annually audit the vegetation management work performed by, or on behalf of, an electrical corporation. The Vegetation Management Audit (VMA) shall identify deficiencies in the electrical corporation's implementation of the vegetation management commitments in its Wildfire Mitigation Plan (WMP).

Energy Safety analyzed each of the 13 vegetation management initiatives listed in PG&E's 2023-2025 WMP for performance year 2024 as part of its VMA.

For each initiative in Section 8.2 (Vegetation Management and Inspections) of PG&E's 2023-2025 Wildfire Mitigation Plan (WMP), Energy Safety identified the quantitative targets and commitments as well as verifiable, narrative statements relevant to each initiative and compared that to the work performed by PG&E in 2024.

This appendix reproduces the information sent to PG&E on October 14, 2025 and describes Energy Safety's analysis and determination of whether PG&E completed all work for each Vegetation Management Initiative.

Energy Safety's analysis included a summary of the information provided by PG&E to substantiate completion of each target or statement, Energy Safety's analysis of that information, and a conclusion regarding completion. Based on the determination of completeness for all targets and statements, Energy Safety provides a finding for each initiative. A finding of "Completed all work" was given only if PG&E provided sufficient documentation or supporting information demonstrating completion of all targets and/or statements within that initiative. If any target or statement was incomplete or insufficiently documented, the overall finding for the initiative was "did not complete all work."

For any commitment or statement for which PG&E was not able to provide supporting documentation or information to support completion, PG&E was asked to address those deficiencies as a part of a corrective action plan (CAP). PG&E's CAP is included in Appendix 2.

PG&E 2024 WMP Vegetation Management Audit

Audit Date: October 14, 2025

Response Due: November 14, 2025

To: Pacific Gas and Electric Company
Daniel Kushner
Senior Director - Electric Risk and Compliance
300 Lakeside Drive Suite 210,
Oakland, CA 94612

From: Sheryl Bilbrey
Sheryl.Bilbrey@energysafety.ca.gov

CC: Karen McLaughlin, Energy Safety
Alec Latuszek, Energy Safety
Mandy Knockaert, PG&E
April Schneider, PG&E
Eric Wu, CPUC

Subject: Office of Energy Infrastructure Safety’s Audit of Pacific Gas and Electric Company’s 2024 WMP Vegetation Management Commitments

Pursuant to Public Utilities Code section 8386.3(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) has completed an audit of the WMP vegetation management initiative commitments in Pacific Gas and Electric Company’s (PG&E) 2023-2025 Wildfire Mitigation Plan (WMP) for the 2024 performance year.

The audit findings provided in this document are based on Energy Safety’s analysis of all relevant data provided to Energy Safety by PG&E to substantiate qualitative statements and quantitative commitments for vegetation management work completed during performance year 2024. Instances where the data provided by the PG&E did not substantiate completion of the work associated with the WMP vegetation management initiative commitments are documented as deficiencies in this audit.

Upon receipt of this audit document, PG&E must provide additional data or clarifications to Energy Safety as part of a Corrective Action Plan (CAP), described below. Energy Safety is

available to meet with PG&E to discuss the audit findings and provide any clarification necessary for PG&E to prepare the CAP.

Energy Safety will consider all supplemental information and data included in the CAP as part of the analysis of PG&E's performance relative to the 2024 WMP vegetation management initiative commitments. Upon completion of Energy Safety's analysis of the CAP, Energy Safety will publish an Audit Report identifying any outstanding deficiencies in the PG&E implementation or planned corrective actions relative to its vegetation management commitments in the PG&E WMP.

PG&E Corrective Action Plan

The CAP is an opportunity for PG&E to provide supplemental data, additional supporting documentation and/or clarifying statements for consideration by Energy Safety as part of our analysis of PG&E's implementation or planned corrective actions relative to its vegetation management commitments in the 2023-2025 WMP. To support Energy Safety's performance assessment, the PG&E CAP may include any of the following:

- Supplemental data and/or supporting documentation substantiating completion of all work on the vegetation management commitment identified as deficient or incomplete in this audit during the 2024 performance year;
- Detailed documentation of constraint(s) that prevented completion of the work commitment and action(s) PG&E has taken to resolve those constraints; and/or
- Description of corrective action(s) PG&E has implemented or plans to implement to address outstanding deficiencies identified in past or current vegetation management audits.

PG&E must email a copy of its CAP to Energy Safety within **30 days** of receipt of the Audit. The list of recipients should include:

- Karen McLaughlin, karen.mclaughlin@energysafety.ca.gov
- Alec Latuszek, alec.latuszek@energysafety.ca.gov
- Environmental Science Division, environmentalscience@energysafety.ca.gov

Audit Process Overview

Energy Safety analyzed each of the thirteen vegetation management initiatives listed in PG&E’s 2023-2025 WMP¹⁰⁸ as part of this initial audit report. The WMP identifies the electrical corporation’s objectives, preventative strategies, and programs that it has implemented to minimize the risk its infrastructure will cause catastrophic wildfire. The vegetation management section of the WMP includes 13 initiatives, each of which includes one or more specific work commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and narrative, but verifiable, statements (e.g., implementation of personnel training programs). Energy Safety identified the WMP quantitative commitments and narrative statements relevant to each initiative and compared that to the work performed by PG&E in performance year 2024. Determination of whether all work was complete for each initiative was based on data and documentation submitted by PG&E.

For each initiative in Section 8.2 (Vegetation Management and Inspections) of PG&E’s 2023-2025 WMP, quantitative targets and commitments as well as verifiable, narrative statements are assessed for completion. PG&E provided data and documentation to support completion of work for six of the 13 initiatives and did not provide information and documentation to support completion of work for seven initiatives. A summary of Energy Safety’s findings regarding the VM initiatives is presented in Table 1. A summary of all work commitments for each initiative and Energy Safety’s determination on completeness is presented in Table 2.

For each WMP commitment, a summary of the supporting information provided by PG&E, Energy Safety’s analysis of that information, and a conclusion regarding completion are documented. Energy Safety then provides a finding for each initiative. A finding of “complete” was given only if PG&E provided sufficient data or supporting information demonstrating completion of all commitments (targets and/or statements) within that initiative. If any commitment was incomplete or insufficiently documented, the overall finding for the initiative was “deficient.”

¹⁰⁸ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

Table 1. Summary of Energy Safety’s findings regarding completion of PG&E’s VM Initiatives in its 2023-2025 WMP for performance year 2024. Deficient initiatives are bold.

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.2 Vegetation Management Inspections	8.2.2 Vegetation Management Inspections	Deficient
8.2.3 Vegetation and Fuels Management	8.2.3.1 Pole Clearing	Deficient
8.2.3 Vegetation and Fuels Management	8.2.3.2 Wood and Slash Management	Deficient
8.2.3 Vegetation and Fuels Management	8.2.3.3 Clearance	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.4 Fall-In Mitigation	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.5 Substation Defensible Space	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.6 High-Risk Species	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.7 Fire Resilient Right-of-Ways	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.8 Emergency Response Vegetation Management	Deficient
8.2.4 Vegetation Management Enterprise System	8.2.4 Vegetation Management Enterprise System	Deficient
8.2.5 Quality Assurance and Quality Control	8.2.5 Quality Assurance and Quality Control	Complete
8.2.6 Open Work Orders	8.2.6 Open Work Orders	Deficient
8.2.7 Workforce Planning	8.2.7 Workforce Planning	Deficient

Appendix 1.

Table 2. Summary of Energy Safety’s conclusions regarding completion of PG&E’s WMP commitments in performance year 2024. Incomplete commitments are bold.

WMP Commitment	2024 Target	2024 Actual	Audit Conclusion
8.2.2.1.1 Vegetation Management Inspections- LiDAR Data Collection – Transmission (VM-01)	17,500 circuit miles	17,953 circuit miles	Completed all work
8.2.2.1.1 Vegetation Management Inspections- Routine Ground - Transmission (VM-13)	17,500 circuit miles	17,952 circuit miles	Completed all work
8.2.2.1.2 Vegetation Management Inspections- Second Patrol – Transmission (VM-14)	5,625 circuit miles	5,683 circuit miles	Completed all work
8.2.2.1.3 Vegetation Management Inspections-Integrated Vegetation Management – Transmission (VM-15)	6,504 acres	7,907 acres	Completed all work
8.2.2.2.1 Vegetation Management Inspections- Routine Patrol – Distribution (VM-16)	78,650 circuit miles	78,308 span miles	Did not complete all work
8.2.2.2.2 Vegetation Management Inspections- Second Patrol – Distribution (VM-17)	25,685 circuit miles	25,519 span miles	Did not complete all work
8.2.2.2.2 Vegetation Management Inspections- Distribution Routine and Second Patrol timing	6 months offset between Distribution Routine and Second Patrol Programs	Achieved	Completed all work
8.2.2.2.3 Vegetation Management Inspections- Vegetation Management for Operational Mitigations (VMOM)	6,500 trees	6,935 trees	Completed all work

Appendix 1.

WMP Commitment	2024 Target	2024 Actual	Audit Conclusion
(VM-18)			
8.2.2.2.4 Vegetation Management Inspections- Tree Removal Inventory (TRI) (VM-04)	20,000 trees	30,751 trees	Completed all work
8.2.2.2.4 Vegetation Management Inspections- TRI recordkeeping	Recordkeeping of Tree Risk Assessment forms	Not achieved	Did not complete all work
8.2.2.2.5 Vegetation Management Inspections- Focused Tree Inspection (FTI) (VM-03)	1,500 circuit miles and completion of level 2 inspections on all potential strike trees	1,557 circuit miles but did not complete level 2 inspections on all potential strike trees	Did not complete all work
8.2.2.3.1 Vegetation Management Inspections- Defensible Space Inspections – Distribution Substation (VM-05)	131 inspections	131 inspections	Completed all work
8.2.2.3.1 Vegetation Management Inspections- Defensible Space Inspections – Transmission Substation (VM-06)	55 inspections	54 inspections*	Completed all work
8.2.2.3.1 Vegetation Management Inspections- Defensible Space Inspections – Hydroelectric Substations and Powerhouses (VM-07)	61 inspections	59 inspections*	Completed all work
8.2.3.1 Pole Clearing Program (VM-02)	63,000 distribution poles	59,881 distribution poles	Did not complete all work
8.2.3.2 Manage downed wood and slash	Manage all wood and slash associated with mitigation activities	Not achieved	Did not complete all work
8.2.3.3 Clearance	Maintain enhanced clearances established by Enhanced Vegetation Management program	Achieved	Completed all work

Appendix 1.

WMP Commitment	2024 Target	2024 Actual	Audit Conclusion
8.2.3.3 Clearance	Maintain minimum distance requirements	Achieved	Completed all work
8.2.3.4 Fall-In Mitigation	Implement VMOM, TRI and FTI programs	Achieved	Completed all work
8.2.3.5 Substation Defensible Space	Complete defensible space work as needed	Achieved	Completed all work
8.2.3.6 High-Risk Species	Mitigate high-risk tree species	Achieved	Completed all work
8.2.3.7 Fire Resilient Right-of-Ways	Increase fire resiliency in right-of-ways	Achieved	Completed all work
8.2.3.8 Emergency Response Vegetation Management	Response to priority work during red flag warnings	Not achieved	Did not complete all work
8.2.3.8 Emergency Response Vegetation Management	Post wildfire response	Achieved	Completed all work
8.2.4 One VM Application Record Keeping Enhancement (Routine, Second Patrol) (VM-19)	Enhance the One VM application for Routine, and Second Patrol to include capability to capture factors for prescribing trees for removal.	Achieved	Completed all work
8.2.4 Record Keeping Enhancement (VMOM, TRI) (VM-20)	Enhance the application for the VMOM and TRI programs to include capability to capture factors for prescribing trees for removal	Achieved	Completed all work
8.2.4 VM Enterprise System: FTI Record Keeping Enhancement (VM-21)	Enhance record keeping practices for FTI by creating records of all potential strike trees inspected using a digitized Tree Risk Assessment form	Not achieved	Did not complete all work
8.2.5.1 Vegetation Management – Quality Assurance (VM-08)	QA sample sizes and pass rates	Sample sizes and pass rates achieved	Completed all work
8.2.5.2 Vegetation Management - Quality Control (VM-22)	QC sample sizes and pass rates	Sample sizes and pass rates achieved	Completed all work

Appendix 1.

WMP Commitment	2024 Target	2024 Actual	Audit Conclusion
8.2.5.2 Field Quality Control (FQC) Program	FQC sample sizes and pass rates	Sample sizes and pass rates achieved	Completed all work
8.2.5.2 Quality Control	Communication of FQC results to execution team	Achieved	Completed all work
8.2.6 Open Work Orders- Timeframes for priority work completion	24 hours for priority 1 20 business days for priority 2	Not achieved	Did not complete all work
8.2.6 Open Work Orders- Timeframe for distribution vegetation management work	Complete within 1 year	Not achieved	Did not complete all work
8.2.6 Open Work Orders- Timeframe for transmission NERC program work order completion	Complete by end of year	Not achieved	Did not complete all work
8.2.6 Open Work Orders- Timeframes for Distribution Second Patrol work	Mitigate dead and dying trees within stated timeframes	Not achieved	Did not complete all work
8.2.7 Workforce Planning- FQC Program Manager training requirements	FQC Program Managers must complete required training	Achieved	Completed all work
8.2.7 Workforce Planning- Vegetation Management Inspector training requirements	Complete necessary training before beginning work in field	9 out of 624 VMIs began work in field before completing training	Did not complete all work
8.2.7 Workforce Planning- Vegetation Management workforce training requirements	Completion of training requirements for all VM staff	Achieved	Completed all work
8.2.7 Workforce Planning- Workforce development	Partner with education institutions for workforce development	Achieved	Completed all work
8.2.7 Workforce Planning- FTI inspector certifications	FTI Inspections performed by 100 percent Tree Risk Assessment Qualified (TRAQ) Arborists	Two out of 468 inspectors did not have records of TRAQ certification	Did not complete all work

* Fewer inspections were completed due to a transfer in substation ownership. Energy Safety verified the change and found that PG&E completed all work for this target.

Analysis of Initiative Completion

8.2.2 Vegetation Management Inspections

The purpose of this initiative is to describe the “Inspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment.”¹⁰⁹ Inspection activities included routine and second patrols of PG&E’s transmission and distribution systems as well as various other inspection programs which identified vegetation encroachment and fall-in risk to PG&E’s electrical facilities. These programs are assessed in the sub-sections below.

8.2.2.1.1 Routine Transmission NERC and Non-NERC

Quantitative Targets or Commitments, Supporting Information & Analysis, and Conclusion

PG&E included the following targets in its 2023-2025 WMP.¹¹⁰ For ease of comparison, the WMP targets and work completed are summarized below:

Initiative Activity	PG&E’s 2024 Target	Actual Completed in 2024
LiDAR Data Collection – Transmission (VM-01)	17,500 circuit miles*	17,953 circuit miles*
Routine Ground Inspections - Transmission (VM-13)	17,740 circuit miles*	17,952 circuit miles*

*Note: The circuit mileage for this target was calculated using PG&E’s Electric Transmission Geographic Information System (ET GIS), which double-counted 270 miles of parallel lines. This affected both PG&E’s targeted mileage and its reported final attainment value for the target.

PG&E’s 2023-2025 WMP stated its Routine NERC and Non-NERC Programs included LiDAR inspection, visual verification of findings, and mitigation of vegetation encroachments on NERC Critical lines and transmission lines not designated as critical by NERC.¹¹¹ The WMP

¹⁰⁹ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹¹⁰ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 608, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹¹¹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 655, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

states that vegetation work is prioritized based on the LiDAR inspections and that “LiDAR detects potential urgent follow up ground patrol and the follow up ground patrol prescribes urgent tree work when conditions so dictate.”¹¹² Therefore, PG&E’s Routine Transmission NERC and Non-NERC workflow has LiDAR inspections flown in late summer and early fall of the prior year (2023) to enable ground inspections to begin in November (2023) so that tree work can begin on January 1 of the performance year (2024).¹¹³ As such, PG&E submitted work acquired between July 2023 and October 2024 to document completion of its LiDAR inspection target and work between January 2024 and November 2024 for its Ground Inspections target. Energy Safety accepted these timelines as a part of the 2024 performance year because the LiDAR inspections conducted in 2023 allowed ground patrols to target inspections in areas potentially requiring urgent mitigation work and to prescribe necessary work at the beginning of the 2024 performance year. Energy Safety’s assessment of this completion of these targets is described in the sections below.

LiDAR Data Collection- Transmission (VM-01)

Supporting Information and Analysis: PG&E submitted Excel files describing the scope and completion of its LiDAR inspections and a report from its vendor to substantiate the completion of this target. The Excel file PG&E provided listed each section of its transmission system that it planned to inspect as part of its 2024 LiDAR routine transmission vegetation inspection program derived using PG&E’s Electric Transmission geographic information system (ET GIS).¹¹⁴ The Excel file included the circuit mileage for each electric transmission line (ETL) segment included in PG&E’s 2024 scope of work, the mileage of parallel lines included as part of the target, the dates LiDAR data was collected by PG&E’s vendor for each segment, and adjustment to the final mileage due to GIS updates, engineering changes, or asset sales made during the 2024 inspection cycle.

The Excel file indicated that while PG&E’s initial scope for target VM-01 was 18,004 circuit miles, this was revised to 17,953 circuit miles to account for changes to PG&E’s transmission system, including reconductoring, decommissioning, improved GIS data accuracy, and the sale of 15 miles of transmission lines to another entity. In addition to these changes, the Excel file indicated that 270 miles included in the target were parallel lines, consisting of spans with six conductors. PG&E stated that, in such cases, its ET GIS system counts the span as double the actual circuit mileage, resulting in 270 miles being added to both the projected and reported totals for target VM-01.¹¹⁵ The file documented that 17,683 circuit miles (17,953, if both parallel lines are counted) derived from PG&E’s ET GIS system and included in the

¹¹² Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 655, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹¹³ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 614, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹¹⁴ Data Request OEIS-E-SVM_2025-PG&E-004, question 1; attachment “DRU15952_Q001_Atch01_VM-01 - LiDAR Routine Data - Work Plan (FY Complete_TVM.xlsx.)”

¹¹⁵ Data Request OEIS-E-SVM_2025-PG&E-005, question 4; attachment “OEIS-E-SVM_2025-PGE-005.pdf,” p. 3.

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revised VM-01 scope were flown by LiDAR during the 2024 inspection cycle. This total matches the annual attainment value reported for VM-01 in Revision 1 of PG&E's 2024 ARC.¹¹⁶

PG&E also provided a report published by its vendor containing all LiDAR data collected by the vendor during the 2024 inspection cycle.¹¹⁷ The report is signed by the vendor's Senior Project Manager and attests that the vendor collected LiDAR data on 17,719 miles of PG&E's transmission system and provided the data to PG&E between November 3, 2023, and June 13, 2024. PG&E stated that the differences in the mileage reported by its vendor and the mileage reported in the Excel file was attributed to the vendor including the 15 miles of transmission lines that were sold to another entity during the 2024 inspection cycle, the inclusion of 21 miles that were not included in PG&E's original scope of work for project year 2024 (e.g., new lines or maintenance agreements that had expired but were renewed), and 270 miles which were classified as parallel lines and not included in the vendor's final attestation of work which utilized LiDAR derived circuit mileage as opposed to PG&E's ET GIS mileage.

Because PG&E's VM-01 target was based on data from its ET GIS system, Energy Safety utilized the final reported value of 17,953 circuit miles for target VM-01. Thus, PG&E exceeded its 2024 annual target of 17,500 circuit miles for VM-01.

Conclusion: PG&E provided information consistent with the completion of work identified in this target.

Routine Ground- Transmission (VM-13)

Supporting Information and Analysis: For its Routine Ground Transmission target (VM-13), PG&E committed to completing 17,740 circuit miles which are prioritized based on Transmission Routine LiDAR detection point data (VM-1).¹¹⁸ PG&E provided an Excel file containing records of both LiDAR data collected in support of its Transmission target (VM-1) as well as ground inspections performed in support of its VM-13 target.¹¹⁹

The Excel file included the ET GIS derived circuit mileage for each ETL segment where PG&E's vendor collected LiDAR data and where ground patrols subsequently performed inspections to verify the LiDAR results and prescribe mitigation as needed. It included the dates when the data collection and inspections occurred, the number of LiDAR detections identified per ETL, and the number of spans within each ETL segment where LiDAR detections were confirmed by ground patrols. The Excel file demonstrated that ground patrols inspected 17,952 circuit

¹¹⁶ Pacific Gas and Electric Company, [Annual Report on Compliance R1 For 2024 Wildfire Mitigation Plan](#), Published April 30, 2025, p. 28, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58691&shareable=true>).

¹¹⁷ Data Request OEIS-E-SVM_2025-PG&E-004, question 1; attachment "DRU15952_Q001_Atch02_PG_E_NV5_VM24_D1toD7_Mileage_20241108_Redacted.pdf."

¹¹⁸ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 343 and p. 622, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹¹⁹ Data Request OEIS-E-SVM_2025-PG&E-005, question 1; attachment "DRU16061_Q001_Atch01_VM-13 Execution Plan (FY VM2024).xlsx."

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miles where LiDAR data had been collected in 2024, and that 1.3 miles that were within the target’s scope of work were constrained. PG&E stated that these constrained miles were due to refusals from property owners such as customers and agencies.¹²⁰

Energy Safety concluded that PG&E completed 17,952 circuit miles of Routine Ground Transmission Inspections in performance year 2024, exceeding its target of 17,740 circuit miles.

Conclusion: PG&E provided information consistent with the completion of work identified in this target. Energy Safety excluded the 1.3 constrained miles from its final sum of circuit miles completed, as these miles were not inspected due to customer refusal. Energy Safety expects PG&E to also exclude any constrained mileage it is unable to inspect from final annual target values in future performance years.

8.2.2.1.2 Transmission Second Patrol

Quantitative Targets or Commitments, Supporting Information & Analysis, and Conclusion

PG&E included the following target in its 2023-2025 WMP.¹²¹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	PG&E’s 2024 Target	Actual Completed in 2024
Second Patrol – Transmission (VM-14)	5,625 circuit miles*	5,683 circuit miles*

*Note: The circuit mileage for this target was calculated using PG&E’s Electric Transmission Geographic Information System (ETGIS), which double-counted 76 miles of parallel lines. This affected both PG&E’s target mileage and its reported final attainment value.

Supporting Information and Analysis: PG&E provided an Excel file containing Transmission Second Patrol ortho imagery inspection data from 2024.¹²² The Excel file listed the circuit mileage for each ETL segment included in PG&E’s 2024 scope of work for its second patrol-transmission (VM-14) target, the mileage of parallel lines included as part of the target, the dates each ETL segment was inspected, and indicated whether each ETL segment was within Tier 3 High Fire Threat District (HFTD), Tier 2 HFTD, High Fire Risk Area (HFRA), Non-HFTD, or Tier 1 Non HFTD/HFRA. PG&E stated that for the VM-14 target’s scope of work, it only included

¹²⁰ Data Request OEIS-E-SVM_2025-PG&E-005, question 1; attachment “OEIS-E-SVM_2025-PGE-005.pdf,” p. 1.

¹²¹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, pp. 343-344, URL: (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

¹²² Data Request OEIS-E-SVM_2025-PG&E-005, question 3; attachment “DRU16061_Q003_Atch01_VM-14 Execution Plan (FY VM2024).xlsx.”

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mileage from inspections performed in Tier 3 HFTD, Tier 2 HFTD, and HFRA Non-HFTD areas.¹²³ This is consistent with PG&E’s 2023-2025 WMP which states that transmission second patrol inspections are performed in HFTD areas.¹²⁴

The Excel file indicated that PG&E’s Transmission Second Patrol Program inspected 5,683 ET GIS derived circuit miles in HFTD Tier 3, Tier 2 and HFRA Non-HFTD areas, and that 16 miles that were part of the VM-14 target’s scope of work were constrained. PG&E stated that these constrained miles were due to refusals from property owners such as customers and agencies.¹²⁵

Energy Safety concluded that PG&E completed 5,683 circuit miles of Second Patrol Transmission Inspections in performance year 2024, exceeding its target of 5,625 circuit miles.

Conclusion: PG&E provided information consistent with the completion of work identified in this target. Energy Safety excluded the 16 constrained miles from its final sum of circuit miles completed, as these miles were not inspected due to customer refusal. Energy Safety expects PG&E to also exclude any constrained mileage it is unable to inspect from final annual target values in future performance years.

8.2.2.1.3 Integrated Vegetation Management

Quantitative Targets or Commitments, Supporting Information & Analysis, and Conclusion

PG&E included the following target in its 2023-2025 WMP.¹²⁶ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	PG&E’s 2024 Target	Actual Completed in 2024
Integrated Vegetation Management – Transmission (VM-15)	6,504 acres	7,907 acres

¹²³ Data Request OEIS-E-SVM_2025-PG&E-004, question 2; attachment “DRU15478_Audit_DR_OEIS_D001.pdf,” p. 3.

¹²⁴ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 658, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

¹²⁵ Data Request OEIS-E-SVM_2025-PG&E-005, question 3; attachment “OEIS-E-SVM_2025-PGE-005.pdf,” p. 2.

¹²⁶ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 344, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

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Supporting Information and Analysis: PG&E provided an Excel file containing inspection records from its 2024 IVM Right of Way (ROW), and IVM Fee Inspection Programs.¹²⁷ The Excel file included location information, inspection dates, and the total number of acres inspected by the programs in 2024. The Excel file indicated that these programs inspected 7,907 total acres in 2024. Therefore, PG&E exceeded its target. Of the inspected acres, 3,829 (48%) were in the HFTD and 4,078 (52%) were in Non-HFTD.

Conclusion: PG&E provided information consistent with the completion of work identified in this target.

8.2.2.2.1 Distribution Routine Patrol

Quantitative Targets or Commitments, Supporting Information & Analysis, and Conclusion

PG&E included the following Distribution Routine Patrol target in its 2023-2025 WMP.¹²⁸ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	PG&E's 2024 Target	Actual Completed in 2023
Distribution - Routine Patrol (VM-16)	78,650 circuit miles	78,308 span miles

Supporting Information and Analysis: PG&E provided Excel files documenting its 2024 Distribution Routine Patrol Program.¹²⁹ The files were organized by project name and listed each inspected span's unique ID, inspection date, span length (measured in "span miles"), and associated project year (2024).

PG&E stated that the Excel files documented the inspection mileage in span miles which it defined as "...the distance between two poles. Span miles in this case is the total number of spans covered under our Distribution Routine program. This unit of measure is different from circuit miles..."¹³⁰ Energy Safety requested that PG&E revise the Excel files to reflect inspection mileage in circuit miles so that the work completed can be compared to the WMP target in the same unit of measure. PG&E responded that its system of record, One VM, only

¹²⁷ Data Request OEIS-E-SVM_2025-PG&E-03, question 7; attachment "DRU15478_Q007_Atch01_2024 VM-15-IVM-Inspection Data.xlsx."

¹²⁸ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 344, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹²⁹ Data Request OEIS-E-SVM_2025-PG&E-03, question 8; attachments "DRU15478_Q008_Atch01_OneVM_Q8 BA&NC 20250415.xlsx," "DRU15478_Q008_Atch02_OneVM_Q8 CC&CV 20250415.xlsx," "DRU15478_Q008_Atch03_OneVM_Q8 NV&SI 20250415.xlsx."

¹³⁰ Data Request OEIS-E-SVM_2025-PG&E-004, question 1; attachment "DRU15952_Audit_DR_OEIS_D001.pdf," p. 4.

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tracks span miles and cannot convert to circuit miles. PG&E also stated that some spans in the Excel file were documented twice. However, the mileage from each span should only be counted once when determining PG&E’s final attainment value for the target.¹³¹ Energy Safety removed duplicate span IDs to ensure accurate mileage reporting and determined that PG&E inspected 78,308 span miles as part of its 2024 inspection cycle.

PG&E stated that “the target for this commitment was set using [electric distribution] ED GIS Data, however the attainment value was based on VM system of record, which is not fully aligned with ED GIS Data. We are considering this target as complete due to all inspections being met per VM system of record.”¹³² Although PG&E asserted that all inspections were completed according to its system of record, it did not demonstrate that the documented 78,308 span miles of inspections are equivalent to or greater than the targeted 78,650 circuit miles. Without a conversion between span miles and circuit miles, PG&E did not demonstrate that the target was met.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this target.

8.2.2.2.2 Distribution Second Patrol

Quantitative Targets or Commitments, Supporting Information & Analysis, and Conclusion

PG&E included the following target in its 2023-2025 WMP.¹³³ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	PG&E’s 2024 Target	Actual Completed in 2024
Distribution - Second Patrol (VM-17)	25,685 circuit miles	25,519 span miles

Supporting Information and Analysis: PG&E provided an Excel file containing records of its 2024 Distribution Second Patrol Program.¹³⁴ The inspection records were organized into distinct “project names,” and included details such as inspection dates, unique IDs of spans

¹³¹ Data Request OEIS-E-SVM_2025-PG&E-004, question 1; attachment “DRU15952_Audit_DR_OEIS_D001.pdf,” p. 4.

¹³² Pacific Gas and Electric Company, [Annual Report on Compliance R1 For 2024 Wildfire Mitigation Plan](#), Published April 30, 2025, p. 27, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58691&shareable=true>).

¹³³ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 612, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹³⁴ Data Request OEIS-E-SVM_2025-PG&E-03, question 12; attachment “DRU15478_Q012_Atch01_VM-17_2nd Patrol_20250415.xlsx.”

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in each project, the “project year” (2024), span length (measured in “span miles”), and whether each span was located in the HFTD or HFRA.

As with its Distribution Routine Patrols, PG&E stated that the Excel file documented the inspection mileage in span miles which it defined as “...the distance between two poles. Span miles in this case is the total number of spans covered under our Distribution Second Patrol program. This unit of measure is different from circuit miles...”¹³⁵ Energy Safety requested that PG&E revise the Excel file to reflect inspection mileage in circuit miles. However, PG&E responded that its system of record, One VM, only tracks span miles and cannot convert them to circuit miles. PG&E also stated that some spans in the Excel file were documented twice. However, the mileage from each span should only be counted once when determining PG&E’s final attainment value for the target.¹³⁶ Energy Safety removed duplicate span IDs to ensure accurate mileage reporting and determined that PG&E inspected 25,519 span miles of its distribution system in HFTD and/or HFRA areas as part of its 2024 inspection cycle.

PG&E informed Energy Safety during monthly meetings held in 2024 that updates to its GIS resulted in changes to its asset registry and the number of miles available for Distribution Second Patrol Inspection. Consequently, PG&E revised its VM-17 targeted mileage to 25,485 circuit miles. While Energy Safety acknowledges that fewer miles were inspected due to these updates and the lower total mileage available, PG&E stated in its WMP that the VM-17 target would be measured in circuit miles, not span miles. Without providing a conversion, PG&E did not demonstrate that the 25,519 span miles of inspections are equivalent to or greater than the revised target of 25,485 circuit miles. Without a conversion between span miles and circuit miles, the information provided does not demonstrate that the target was met.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this target.

Statement 1

Statement: “...the VM Second Patrol program performs scheduled patrols approximately six months offset from the routine patrol on overhead primary and secondary distribution facilities.”¹³⁷

Supporting Information and Analysis: PG&E provided an Excel file containing the dates that spans of its overhead distribution system were inspected by its Routine Patrol and Second

¹³⁵ Data Request OEIS-E-SVM_2025-PG&E-004, question 4; attachment “DRU15952_Audit_DR_OEIS_D001.pdf,” p. 5.

¹³⁶ Data Request OEIS-E-SVM_2025-PG&E-004, question 4; attachment “DRU15952_Audit_DR_OEIS_D001.pdf,” p. 5.

¹³⁷ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 667, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

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Patrol Programs during its project year 2024 inspection cycle.¹³⁸ The Excel file indicated that 543,571 spans were inspected by both programs during PG&E’s 2024 inspection cycle. The table below summarizes the time elapsed between the two inspections for each span, grouped into three-month intervals.

Number of spans inspected 1 to 3 months apart	Number of spans inspected 4 to 6 months apart	Number of spans inspected 7 to 9 months apart	Number of spans inspected 10 to 12 months apart
41,320 (8%)	342,282 (63%)	136,803 (25%)	23,166 (4%)

The Excel file indicated that, on average, spans were inspected by the two programs 160 days apart. This average aligns with the targeted schedule of an approximate six-month offset between the inspection programs.

While Energy Safety concluded that PG&E’s implementation of these two programs aligned with the schedule described in its 2023-2025 WMP, it noted that 41,320 (8%) spans were inspected by each program only one to three months apart. Additionally, 23,166 (4%) spans were inspected by each program 10 to 12 months apart. While Energy Safety recognizes that inspection schedules may vary due to operational and external factors, it expects PG&E to minimize scheduling deviations and ensure inspections are conducted at intervals that most effectively reduce wildfire risk on its system.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

8.2.2.2.3 Vegetation Management for Operational Mitigations

PG&E included a target in its 2023-2025 WMP to mitigate 6,500 trees under its Vegetation Management for Operational Mitigations (VMOM) Program in 2024. As the target consisted of the mitigation of trees to reduce fall-in risk to PG&E’s electrical infrastructure, Energy Safety analyzed the work performed by PG&E to complete this target in section 8.2.3.4 Vegetation and Fuels Management- Fall-in Mitigation.

8.2.2.2.4 Tree Removal Inventory

PG&E included a target in its 2023-2025 WMP to mitigate 20,000 trees under its Tree Removal Inventory (TRI) Program in 2024. As the target consisted of the mitigation of trees to reduce fall-in risk to PG&E’s electrical infrastructure, Energy Safety analyzed the work performed by PG&E to complete this target in section 8.2.3.4 Vegetation and Fuels Management- Fall-in Mitigation.

¹³⁸ Data Request OEIS-E-SVM_2025-PG&E-03, question 13; attachment “DRU15478_Q013_Atch01_Q13_2024 6 Month Offset Average.xlsx.”

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 2

Statement: “The Tree Removal Inventory Program digitally records data into a system called Field Maps. The data entered into the system includes information about Level 2 inspections. Our current procedure requires that a photograph of the TRAQ form is taken after the inspection is completed for digital record keeping purposes if the TRAQ certified arborist determines abatement is not required.”¹³⁹

Supporting Information and Analysis: PG&E provided an Excel file containing records of trees that were originally identified as requiring work under the Enhanced Vegetation Management (EVM) program and were reassessed in 2024 by Tree Risk Assessment Qualified (TRAQ) Certified Arborists through the Tree Removal Inventory (TRI) Program.¹⁴⁰ These trees were found to still have strike potential to PG&E’s electrical infrastructure but were determined to no longer require mitigation work.

The Excel file included inspection dates, location (latitude and longitude), inspection outcomes, and whether a TRAQ Certified Arborist completed and uploaded a TRAQ form (a standardized assessment used to evaluate a tree’s structural condition, likelihood of failure, potential targets, and overall risk) to PG&E’s system of record. According to PG&E’s 2023–2025 WMP, a TRAQ form must be completed and uploaded whenever a tree initially prescribed for work under the EVM program is reassessed and found to no longer require work.

The file indicated that 5,658 such trees were reassessed in 2024. Of these, 91 (2%) did not have a completed TRAQ form uploaded. Therefore, PG&E did not provide documentation to support completion of this commitment.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this statement.

Statement 3

Statement: “The TRI Program is working down its tree inventory in a risk informed manner and is focused on mitigating the trees in the highest risk CPZs in 2023.”¹⁴¹

Supporting Information and Analysis: PG&E provided an Excel file listing all 11,136 Circuit Protection Zones (CPZs) that were delineated in its service territory in 2024 ranked in order

¹³⁹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 646, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

¹⁴⁰ Data Request OEIS-E-SVM_2025-PG&E-03, question 6; attachment “DRU15478_Q016_Atch01_OneVM_Q16-18_20250416.xlsx.”

¹⁴¹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 650, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

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from most to least risk.¹⁴² Additionally, PG&E provided a second Excel file containing the CPZs in which TRI work was performed in 2024.¹⁴³ The Excel files indicated that all 2024 TRI work was performed in PG&E's top 323 highest risk ranked CPZs.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

8.2.2.2.5 Focused Tree Inspections

Quantitative Targets or Commitments, Supporting Information & Analysis, and Conclusion

PG&E included the following Focused Tree Inspections (FTI) target in its 2023-2025 WMP.¹⁴⁴ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	PG&E's 2024 Target	Actual Completed in 2024
Focused Tree Inspections (VM-03)	1,500 circuit miles and completion of Level 2 inspections of all potential strike trees	1,557 circuit miles but did not complete level 2 inspections on all potential strike trees

Supporting Information and Analysis: PG&E specified in its 2023-2025 WMP that the Focused Tree Inspections (FTI) would occur in defined Areas of Concern (AOC) within its service territory, and that FTI inspections would include performing a level 2 inspection on all potential strike trees along the 1,500 circuit miles inspected.¹⁴⁵

PG&E provided an Excel file containing inspection records from its 2024 FTI program.¹⁴⁶ The Excel file included inspection locations (latitude and longitude), inspection dates, and the AOCs in which the inspections were completed. The Excel file indicated that PG&E's FTI program inspected 1,557 circuit miles in AOC locations in 2024. Of these inspected circuit miles, 1,545 (99%) were in HFTD Tier 2 and Tier 3 and 12 (1%) were in non-HFTD.

¹⁴² Data Request OEIS-E-SVM_2025-PG&E-03, question 18; attachment "DRU15478_Q018_Atch01_TRI Master CPZ List.xlsx."

¹⁴³ Data Request OEIS-E-SVM_2025-PG&E-03, question 18; attachment "DRU15478_Q016_Atch01_OneVM_Q16-18_20250416.xlsx."

¹⁴⁴ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 608, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹⁴⁵ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 608, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹⁴⁶ Data Request OEIS-E-SVM_2025-PG&E-03, question 19; attachment "DRU15478_Q019_Atch01_FT1 2024 ROE with Span_20250310.xlsx."

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The information provided indicated that PG&E exceeded its targeted inspection mileage. However, a separate Excel file provided by PG&E indicated that only 95 out of 1,203,745 (<1%) strike trees that were inspected by the FTI program in 2024 were inspected using level 2 methodology which entails a 360-degree inspection of a tree.¹⁴⁷ PG&E's WMP specified that level 2 inspections were a requirement for target VM-03,¹⁴⁸ PG&E's failure to complete these level 2 inspections indicated that PG&E did not complete all work associated with its VM-03 target for the 2024 performance year.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this target.

8.2.2.3.1 Defensible Space Inspection

Quantitative Targets or Commitments, Supporting Information & Analysis, and Conclusion

PG&E included the following targets in its 2023-2025 WMP.¹⁴⁹ For ease of comparison, the WMP targets and work completed are summarized below:

Initiative Activity	PG&E's 2024 Target	Actual Completed in 2024
Defensible Space Inspections – Distribution Substation (VM-05)	131 inspections	131 inspections
Defensible Space Inspections – Transmission Substation (VM-06)	55 inspections	54 inspections*
Defensible Space Inspections – Hydroelectric Substations and Powerhouses (VM-07)	61 inspections	59 inspections*

¹⁴⁷ Data Request OEIS-E-SVM_2025-PG&E-03, question 20; attachments

“DRU15478_Q020_Atch01_BA&NC&CC&CV_20250415.xlsx,” “DRU15478_Q020_Atch02_NV_20250415.xlsx,” “DRU15478_Q020_Atch03_SI_20250415.xlsx.”

¹⁴⁸ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 608, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹⁴⁹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, pp. 609-610, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

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* Fewer inspections were completed due to a transfer in substation ownership. Energy Safety verified the change and found that PG&E completed all work for this target.

Defensible Space Inspections – Distribution Substation (VM-05)

Supporting Information and Analysis: PG&E provided an Excel file containing records of all defensible space inspections completed at PG&E’s distribution substations in 2024.¹⁵⁰ The Excel file included distribution substation names and locations (latitude and longitude), and inspection dates. The Excel file indicated that PG&E completed defensible space inspections at 131 distribution substations between January 4, 2024, and May 28, 2024, meeting its target of 131 inspections.

Conclusion: PG&E provided information consistent with the completion of all work identified in this target.

Defensible Space Inspections – Transmission Substation (VM-06)

Supporting Information and Analysis: PG&E provided an Excel file containing records of all defensible space inspections completed at PG&E’s transmission substations in 2024.¹⁵¹ The Excel file included transmission substation names and locations (latitude and longitude), and inspection dates. The Excel file indicated that PG&E completed defensible space inspections at 54 transmission substations in HFTD areas between January 8, 2024, and June 7, 2024. Energy Safety noted that one of the substations listed in the Excel file (Belden) did not have an inspection date for 2024 and instead stated in the “inspection date” column of the Excel file: “Asset ownership transfer- no completion date.”

PG&E stated that it performed only 54 inspections instead of its targeted 55 “...due to the transfer of equipment at Belden Powerhouse (PH) from the VM-06 transmission substations sub-group into the VM-07 Power Generation sub-group. Starting in 2024 and going forward, PG&E will perform Defensible Space Inspections for Belden PH as part of the VM-07 initiative alone.”¹⁵²

Energy Safety reviewed an Excel file provided by PG&E containing inspection records completed under the VM-07 initiative and confirmed that the Belden PH was inspected under the VM-07 initiative in 2024.¹⁵³ Energy Safety accepts PG&E’s explanation and why only 54

¹⁵⁰ Data Request OEIS-E-SVM_2025-PG&E-03, question 22; attachment “DRU15478_Q022_Atch01_VM05_Inspections.xlsx.”

¹⁵¹ Data Request OEIS-E-SVM_2025-PG&E-03, question 24; attachment “DRU15478_Q024_Atch01_VM06_Inspections.xlsx.”

¹⁵² Data Request OEIS-E-SVM_2025-PG&E-03, question 24; attachment “DRU15478_Audit_DR_OEIS_D001.pdf,” p. 12.

¹⁵³ Data Request OEIS-E-SVM_2025-PG&E-03, question 24; attachment “DRU15478_Q026_Atch01_VM-07_Q26&Q35_Hydro Sub PH.xlsx.”

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transmission substations were inspected as part of the VM-06 target as opposed to the targeted 55.

Conclusion: PG&E provided information consistent with the completion of work identified in this target.

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

Supporting Information and Analysis: PG&E provided an Excel file containing records of all defensible space inspections completed at PG&E’s hydroelectric generation substations and powerhouses during its 2024 inspection cycle.¹⁵⁴ The Excel file included facility names, locations (latitude and longitude), and inspection dates. The Excel file indicated that PG&E completed defensible space inspections at 59 hydroelectric generation substations and powerhouses between April 16, 2024, and August 23, 2024. Energy Safety noted that two of the facilities listed in the Excel file (Tule River PH and Deer Creek PH) did not have an inspection date for 2024 and instead stated in the “inspection date” column of the Excel file: “Documentation of the sale of the Tule River PH has been uploaded to this record. No pre-inspection or mitigation work required for Defensible Space.” PG&E provided documentation supporting that the Tule River PH and Deer Creek PH were no longer owned by PG&E.¹⁵⁵ Energy Safety accepts that PG&E completed inspections at only 59 of the targeted 61 facilities due to the sale of two facilities.

Conclusion: PG&E provided information consistent with the completion of work identified in this target.

Finding - 8.2.2 Vegetation Management Inspections

PG&E did not provide information consistent with the completion of work identified in 8.2.2.2.1 Distribution Routine Patrol, 8.2.2.2.2 Distribution Second Patrol, 8.2.2.2.5 Focused Tree Inspections, and 8.2.2.2.4 Tree Removal Inventory. Therefore, Energy Safety concludes that Initiative 8.2.2 Vegetation Management Inspections is deficient.

In response to Energy Safety’s findings related to PG&E’s Distribution Routine and Second Patrol program targets, PG&E must explain in its CAP why, despite using ED GIS data to establish its VM-16 and VM-17 targets in circuit miles, it could not track progress toward these targets using the ED GIS system in 2024. PG&E must also clarify how it ensured that the span miles completed, based on its system of record (One VM), were equivalent to the projected number of circuit miles for VM-16 and VM-17. PG&E must further demonstrate that no areas within the scope of these targets were missed as a result of using a different system of record and unit of measure to track progress. Finally, PG&E must include corrective measures to

¹⁵⁴ Data Request OEIS-E-SVM_2025-PG&E-03, question 24; attachment “DRU15478_Q026_Atch01_VM-07_Q26&Q35_Hydro Sub PH.xlsx.”

¹⁵⁵ Data Request OEIS-E-SVM_2025-PG&E-03, question 24; attachments “DRU15478_Q028_Atch01_Tule River PH_Redacted.pdf,” “DRU15478_Q028_Atch02_Deer Creek PH_Redacted.pdf.”

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ensure that, moving forward, progress for each target is tracked using the same unit of measure specified in its approved WMPs.

In response to Energy Safety’s findings related to PG&E’s absence of level two inspection records for its FTI program, PG&E must explain in its CAP the decision-making process that led to not documenting or performing level 2 inspections for all potential strike trees included in the 2024 FTI target, and how it plans to inspect and document potential strike trees during FTI inspections in future performance years.

In response to Energy Safety’s finding of incomplete recordkeeping associated with PG&E’s TRI program, PG&E must provide in its CAP, an updated dataset for the 91 trees that were missing required TRAQ form documentation. This dataset must demonstrate either that a TRAQ form has since been completed for each of these trees, or that corrective actions have been planned to ensure any remaining recordkeeping issues will be resolved.

8.2.3.1 Vegetation and Fuels Management- Pole Clearing

The purpose of this initiative was to describe the “Plan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area).”¹⁵⁶

Quantitative Targets or Commitments, Supporting Information & Analysis, and Conclusion

PG&E included the following target in its 2023-2025 WMP.¹⁵⁷ For ease of comparison, the WMP target and work completed is summarized below:

Initiative Activity	PG&E’s 2024 Target	Actual Completed in 2024
Pole Clearing Program (VM-02)	63,000 distribution poles	59,881 distribution poles

Supporting Information and Analysis: PG&E’s Procedure TD-7112S stated that PG&E’s annual pole clearing cycle runs from October of the previous year through September of the current

¹⁵⁶ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), Published December 2022, p. A-24, URL: (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

¹⁵⁷ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 608, URL: (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

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year.¹⁵⁸ Therefore, Energy Safety’s assessment of PG&E’s completion of this target included work from October 2023 to September 2024 for performance year 2024.

PG&E provided an Excel file containing records of distribution pole clearing activities completed during its 2024 pole clearing cycle.¹⁵⁹ The Excel file included the following information: pole number, pole location (latitude and longitude), inspection date, PRC 4292 exemption status, work order line item status (indicating if prescribed work was completed), and the date the prescribed work was completed. The table below summarizes the status of the 77,152 distribution poles documented in this file, which PG&E attempted to inspect and clear during the 2024 performance year, organized by PRC 4292 exemption status.

Work Completed	# of PRC 4292 exempt poles	# of non-exempt poles	# of poles with a “Null” PRC 4292 exemption status	Total
Inspected and cleared (where clearing necessary)	4,092	55,784	5	59,881
Completed, Partial refusal	37	1,177	0	1,214
Completed, Pending 1254 C	404	11,971	1	12,376
Constrained	14	3,629	11	3,654
Not found	0	0	9	9
“NULL” status	16	2	0	18
Total	4,563	72,563	26	77,152

The Excel file provided by PG&E indicated that 59,881 distribution poles were inspected and cleared (when clearance was necessary) during its 2024 pole clearing cycle. Of these, 55,784 poles (93%) were classified as PRC 4292 non-exempt. An additional 17,271 poles were also listed in the file; however, the status of these poles indicated that inspection and/or clearing work was only partially completed due to reasons such as customer refusal, unidentified constraints, inability to locate the poles, or a “null” status. PG&E did not include a description

¹⁵⁸ Data Request 276, question 7; attachment “DRU14563_Q007_Atch01_TD-7112S_Redacted.pdf.”

¹⁵⁹ Data Request OEIS-E-SVM_2025-PG&E-004, question 7; attachment “DRU15952_Q007_Atch01_DRU15478_Q029_Atch01_VMDR-3714_Q07_Response_update_External.xlsx.”

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of the work status field attributes (e.g., “Null”, “Completed, Pending 1254c”, or “Completed, partial refusal”), therefore Energy Safety could not verify that work on these poles was properly prescribed and/or completed. Energy Safety only counted poles which had a status of “inspected and cleared” towards this target.

PG&E also did not provide a description of how it was working to resolve the constraints which prohibited work on 3,654 poles. Energy Safety acknowledges that external factors may delay or constrain pole clearing work. However, PG&E’s stated target was to inspect, clear, and maintain poles where clearing is necessary. Energy Safety understood this to mean that the full scope of work outlined in PG&E’s 2023-2025 WMP would be completed at each pole counted toward the VM-02 target. The data provided indicates that a significant portion of the 2024 pole clearing work was either only attempted or only partially completed due to constraints, indicating that the target was not fully achieved.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this target.

Finding – 8.2.3.1 Pole Clearing

PG&E did not provide information consistent with the completion of work identified in Initiative 8.2.3.1 Pole Clearing. Therefore, Energy Safety concludes that Initiative 8.2.3.1 Pole Clearing is deficient.

In its CAP PG&E must provide records of pole clearing work, clarifying completion of pending or incomplete work and whenever work was not completed, PG&E must submit documentation describing the constraints which prevented this work. If PG&E did not complete its pole clearing target, it must identify the actions it plans to implement to ensure the work is completed in future performance years.

8.2.3.2 Vegetation and Fuels Management- Wood and Slash Management

The purpose of this initiative was to take actions “to manage all downed wood and “slash” generated from vegetation management activities.”¹⁶⁰

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 4

Statement: “Debris less than 4 inches in diameter that is generated during pruning activities are chipped or lopped and scattered on the property in accordance with applicable regulations. Chips are left on site or removed off site based on owner preferences.”¹⁶¹

Supporting Information and Analysis: Energy Safety requested records from PG&E documenting its management of debris less than 4 inches in diameter generated by its pruning activities in 2024. In its response, PG&E stated that it does not track the management of vegetative material less than four inches in diameter, and that there is no language in its internal procedures that require its vegetation management crews to track the management of slash and woody debris.¹⁶² PG&E also stated that it expects its vegetation management crews to complete debris treatment in coordination with tree work and that this expectation is clearly defined in its vegetation management crew contracts.¹⁶³ PG&E included an excerpt of its vegetation management crew contract which requires vegetation management crews to “[r]emove or mitigate all material 4” and less in diameter from work site...”¹⁶⁴ Furthermore, PG&E stated that “[w]hen tree work is logged as complete in [its] database by VM crews, it implies that the crews have also completed the associated debris treatment.”¹⁶⁵ Lastly, PG&E stated that “...PG&E has no plans to integrate wood and slash debris management tracking into internal procedures.”¹⁶⁶

While PG&E’s vegetation management crew contract indicated that vegetation management crews are required to remove or mitigate debris less than four inches in diameter generated by vegetation management activities, PG&E does not require contract crews to document the removal of debris less than 4 inches in diameter and cannot verify that this work was

¹⁶⁰ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁶¹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 680, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹⁶² Data Request OEIS-E-SVM_2025-PG&E-03, question 30; attachment “DRU15478_Audit_DR_OEIS_D001,” p. 15.

¹⁶³ Data Request OEIS-E-SVM_2025-PG&E-03, question 30; attachment “DRU15478_Audit_DR_OEIS_D001,” p. 15.

¹⁶⁴ Data Request OEIS-E-SVM_2025-PG&E-03, question 30; attachment “DRU15478_Audit_DR_OEIS_D001,” p. 15.

¹⁶⁵ Data Request OEIS-E-SVM_2025-PG&E-03, question 30; attachment “DRU15478_Audit_DR_OEIS_D001,” p. 15.

¹⁶⁶ Data Request OEIS-E-SVM_2025-PG&E-03, question 30; attachment “DRU15478_Audit_DR_OEIS_D001,” p. 15.

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completed. Therefore, PG&E could not demonstrate that the work described in Statement 4 above was completed in 2024.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this statement.

Statement 5

Statement: “The Wood Management program addresses large wood generated by PG&E’s VM activities. This includes post-fire work activities, and wood generated by the EVM Program. Wood Management is a voluntary program in which property owners must opt in to participate. The program is designed to help alleviate the potential burden caused by the presence of larger diameter wood on customer properties resulting from PG&E activities.”¹⁶⁷

Supporting Information and Analysis: PG&E provided an Excel file containing wood management work orders completed in 2024.¹⁶⁸ The Excel file indicated that PG&E completed 66,512 wood management units in 2024. The work consisted of the removal (hauling off site) or relocating/processing on site of material greater than 4 inches in diameter, demonstrating completion of work associated with this statement.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

Finding – 8.2.3.2 Wood and Slash Management

PG&E did not provide information consistent with the completion of work identified in Initiative 8.2.3.2 Wood and Slash Management. Therefore, Energy Safety concludes that Initiative 8.2.3.2 Wood and Slash Management is deficient.

In its CAP PG&E must provide records of slash (debris less than 4 inches in diameter) removal for work associated with its vegetation management programs and whenever work was not completed, PG&E must submit documentation describing the constraints which prevented this work. If PG&E does not have records of slash removal, it must identify the actions it plans to implement to ensure the work is completed in future performance years.

¹⁶⁷ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 680, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹⁶⁸ Data Request OEIS-E-SVM_2025-PG&E-03, question 31; attachment “DRU15478_Q031_Atch01_PGE_WM_2024_Completions.xlsx.”

8.2.3.3 Vegetation and Fuels Management- Clearance

The purpose of this initiative was to take actions “after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming.”¹⁶⁹

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 6

Statement: “PG&E is transitioning the maintenance of enhanced clearances that were achieved in EVM to Routine VM patrols. We established routine maintenance requirements for electric distribution circuits where EVM scope clearances have been performed (in HFTD designated areas) and passed by work verification.”¹⁷⁰

Supporting Information and Analysis: PG&E provided an Excel file which documented work identified and completed by PG&E’s Distribution Routine Patrol Program in 2024 to maintain EVM clearances.¹⁷¹ The Excel file included information such as tree inspection dates, location information (latitude and longitude), whether work was prescribed for inspected trees, the completion dates for prescribed tree work, the work completion status of the prescribed work, and whether each record was relevant to maintaining EVM scope. Energy Safety considered any work in the Excel file with a status of “completed,” or “approved,” and an “actual trim type” of “Remove,” “Trim,” “TGR” (tree growth regulator) as completed work. Based on this criteria, the file indicated that PG&E’s Distribution Routine Patrol Program completed clearance work on 113,215 trees to maintain EVM clearance in 2024.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

Statement 7

Statement: “The VM routine program performs scheduled inspections... to maintain radial clearance between vegetation and conductors by identifying trees that will encroach within the MDR [minimum distance requirements] ...”¹⁷² And “The objective of the Second Patrol is

¹⁶⁹ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁷⁰ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 674, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹⁷¹ Data Request OEIS-E-SVM_2025-PG&E-03, question 32; attachment “DRU15478_Q032_Atch01_OneVM_Q32 20250416.xlsx.”

¹⁷² Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 664, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

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to maintain radial clearance between vegetation and conductors by identifying trees that will encroach within the MDRs...”¹⁷³

Supporting Information and Analysis: PG&E provided two Excel files: one containing inspection and vegetation management records from its Distribution Routine Patrol Program and the other containing records from its Second Patrol Program. The Excel files included information such as inspection date, location information (latitude and longitude), type of vegetation management work prescribed, the work completion status of the prescribed work, and the completion date of the prescribed work.¹⁷⁴ Energy Safety considered any work in the Excel file with a status of “completed,” or “approved,” and an “actual trim type” of “Remove,” or “Trim” as completed work. Based on this criteria, the Excel files indicated that PG&E’s Distribution Routine and Second Patrol Programs completed clearance work to maintain minimum distance requirements on 487,666, and 54,176 trees in 2024, respectively. In total, 541,842 trees received clearance work across both programs in 2024.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

Finding – 8.2.3.3 Clearance

PG&E provided information consistent with the completion of work identified in Initiative 8.2.3.3 Clearance. Therefore, Energy Safety concludes that Initiative 8.2.3.3 Clearance is complete.

¹⁷³ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 667, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹⁷⁴ Data Request OEIS-E-SVM_2025-PG&E-04, question 8; attachments
“DRU15952_Q008_Atch02_DRU15478_Q033_Atch02_OneVM_2P_20250416.xlsx,”
“DRU15952_Q008_Atch01_DRU15478_Q033_Atch01_OneVM_Routine 20250416.xlsx.”

8.2.3.4 Vegetation and Fuels Management- Fall-in Mitigation

The purpose of this initiative was to take actions “to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment.”¹⁷⁵

Quantitative Targets or Commitments, Supporting Information & Analysis, and Conclusion

PG&E included the following targets in its 2023-2025 WMP.¹⁷⁶ For ease of comparison, the WMP targets and work completed are summarized below:

Initiative Activity	PG&E’s 2024 Target	Actual Completed in 2024
VMOM Program (VM-18)	Mitigate 6,500 trees	6,935 trees
TRI Program (VM-04)	20,000 trees	30,751 trees

VMOM (VM-18)

Supporting Information and Analysis: PG&E provided Excel files containing records of vegetation management work completed under the VMOM Program in 2024.¹⁷⁷ The Excel files included the dates mitigation work was completed, and the location of the mitigation work. Regarding the files, PG&E stated that there were two trees with duplicate entries. After excluding the duplicate entries, the Excel files indicated that PG&E completed mitigation work on 6,935 trees in 2024. Therefore, PG&E exceeded its target.

Conclusion: PG&E provided information consistent with the completion of work identified in this target.

¹⁷⁵ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁷⁶ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, pp. 341, 344, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹⁷⁷ Data Request OEIS-E-SVM_2025-PG&E-03, question 15; attachments "DRU15478_Q015_Atch01_VM-18_Legacy VMOM_Redacted.xlsx," "DRU15478_Q015_Atch02_VM-18_OneVM VMOM.xlsx."

TRI (VM-04)

Supporting Information and Analysis: PG&E provided an Excel file containing tree work and inspection records that demonstrated the completion of mitigation work in its TRI Program.¹⁷⁸ In its 2023-2025 WMP, PG&E describes mitigation work for trees in the TRI target as either “(1) removed by the TRI program, (2) removed by another PG&E VM program and no longer present, or (3) no longer poses a threat to PG&E facilities because the facilities have been relocated.”¹⁷⁹ The Excel file included inspection dates, inspection locations (latitude and longitude), the outcomes of the inspections (whether work was still needed), the date any prescribed vegetation management work was completed, and whether each tree record was “claimed” in 2024. The Excel file indicated that in 2024, the TRI program completed mitigation work as described in its 2023-2025 WMP on 30,751 trees. Therefore, PG&E exceeded its target.

The Excel file indicated that 1,340 additional trees were “claimed” in 2024. However, these trees were either assessed prior to 2024 and found not to require work, or they were mitigated outside of the 2024 performance year. In a data request response, PG&E stated that “[a]lthough the work date for these trees was in 2023, we did not claim these trees towards the 2023 target. The 1,340 trees came into scope for the 2024 TRI program year, and we have these claimed as trees worked towards the 2024 TRI Target.”¹⁸⁰ Because these trees were mitigated in 2023, outside of the 2024 performance year, Energy Safety concluded that PG&E mitigated 30,751 trees towards its VM-04, 2024 target. Despite this discrepancy in reporting, the documentation indicated that PG&E exceeded its target.

Conclusion: PG&E provided information consistent with the completion of work identified in this target.

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 8

Statement: “In 2023, PG&E is implementing three new VM Programs that support fall-in mitigations: VM for Operational Mitigations; Tree Removal Inventory; and Focused Tree Inspections.”¹⁸¹

Supporting Information and Analysis: As detailed in Energy Safety’s analysis of PG&E’s 2024 VMOM and TRI targets, PG&E demonstrated that these programs were implemented to

¹⁷⁸ Data Request OEIS-E-SVM_2025-PG&E-03, question 16; attachment “DRU15478_Q016_Atch01_OneVM_Q16-18_20250416.xlsx.”

¹⁷⁹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 614, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹⁸⁰ Data Request OEIS-E-SVM_2025-PG&E-03, question 6; attachment “OEIS-E-SVM_2025-PGE-03.pdf,” p. 6.

¹⁸¹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 683, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

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mitigate fall-in risk in 2024. In addition to these programs, Energy Safety also reviewed work completed by PG&E's FTI program which also served to mitigate fall-in risk.

PG&E provided an Excel file containing records of work completed by the FTI program in 2024.¹⁸² The Excel file included the dates and locations (latitude and longitude) of mitigation work completed by the program, and the reason each tree was prescribed mitigation work. Energy Safety considered any work in the Excel file with a status of "completed," or "approved," and an "actual trim type" of "Remove," or "Trim" as completed work. Based on this criteria, the Excel file indicated that 17,884 trees were "trimmed," or "removed" under the FTI program to mitigate fall-in risk in 2024.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

Finding – 8.2.3.4 Fall-in Mitigation

PG&E provided information consistent with the completion of work identified in Initiative 8.2.3.4 Fall-in Mitigation. Therefore, Energy Safety concludes that Initiative 8.2.3.4 Fall-in Mitigation is complete.

8.2.3.5 Vegetation and Fuels Management- Substation Defensible Space

The purpose of this initiative was to take actions "to reduce ignition probability and wildfire consequence due to contact with substation equipment."¹⁸³

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 9

Statement: "Inspection and mitigation activities [related to PG&E's substation utility defensible space program] are prioritized based on elevation and annual fuel growth in which lower elevations are inspected first as they have a higher rate of growth and dry out earlier in the season while higher elevations grow slower and later into the year."¹⁸⁴

Supporting Information and Analysis: PG&E stated that the prioritization language written in its 2023-2025 WMP was only intended for hydroelectric sites which have a more variable elevation range that contributes to varied seasonal vegetation growth rates. Furthermore, the

¹⁸² Data Request OEIS-E-SVM_2025-PG&E-03, question 34; attachment "DRU15478_Q034_Atch01_OneVM_Q34_All_20250416.xlsx."

¹⁸³ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-25, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁸⁴ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 685, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

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transmission and distribution substations are located primarily at low elevation, and prioritizing VM work based on elevation alone would be inefficient.¹⁸⁵ Due to this fact, PG&E only provided elevation and corresponding prioritization information for its hydroelectric sites. Energy Safety accepted this explanation.

For its hydroelectric sites, PG&E provided an Excel file documenting defensible space inspection and mitigation work that occurred at PG&E's hydroelectric generation substations in 2024.¹⁸⁶ The Excel file included location information (latitude and longitude) and the elevation of each facility, the date each facility was inspected, and the date vegetation management activities were completed at each substation. The Excel file indicated that all 59 hydroelectric sites that were inspected under PG&E's VM-08 target received vegetation management mitigation work between April 16, and August 23, 2024. The Excel file also indicated that PG&E typically inspected lower elevation sites earlier in the year compared to higher elevation sites.

For its transmission and distribution substations, PG&E provided an additional Excel file containing the dates of defensible space inspections and vegetation management mitigation activities completed at the substations in 2023.¹⁸⁷ The Excel file indicated that all 185 substations that were inspected under PG&E's VM-05 and VM-06 targets received vegetation management mitigation work between April 4 and September 24, 2024.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

Finding – 8.2.3.5 Substation Defensible Space

PG&E provided information consistent with the completion of work identified in Initiative 8.2.3.5 Substation Defensible Space. Therefore, Energy Safety concludes that Initiative 8.2.3.5 Substation Defensible Space is complete.

8.2.3.6 Vegetation and Fuels Management- High-Risk Species

The purpose of this initiative was to take actions “to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation.”¹⁸⁸

¹⁸⁵ Data Request 276, question 18; attachment “DRU14563_Audit_DR_OEIS_D001.pdf,” p. 6.

¹⁸⁶ Data Request OEIS-E-SVM_2025-PG&E-03, question 35; attachment “DRU15478_Q026_Atch01_VM-07_Q26&Q35_Hydro Sub PH.xlsx.”

¹⁸⁷ Data Request OEIS-E-SVM_2025-PG&E-03, question 36; attachment “DRU15478_Q036_Atch01_VM05_VM06_Inspections.xlsx.”

¹⁸⁸ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-25, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 10

Statement: “PG&E seeks to identify trees at elevated risk of failing and striking our electrical facilities. Species is just one factor of many that PG&E takes into account to reliably identify the higher risk trees.”¹⁸⁹

Supporting Information and Analysis: PG&E stated that it has two programs specifically designed to identify and manage high-risk tree species: Focused Tree Inspection (FTI) and Vegetation Management for Operational Mitigations (VMOM).¹⁹⁰ As detailed in Section 8.2.3.4 Vegetation and Fuels Management- Fall-in Mitigation, PG&E provided information which demonstrated that both programs were implemented in 2024. While the provided information did not demonstrate that these programs focused on the inspection and mitigation of a specific tree species, it did indicate that PG&E identified and mitigated trees with a higher risk of striking its electrical equipment. Therefore, PG&E met the objective of identifying higher-risk trees as described in Statement 10.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

Finding – 8.2.3.6 High-Risk Species

PG&E provided information consistent with the completion of work identified in Initiative 8.2.3.6 High-Risk Species. Therefore, Energy Safety concludes that Initiative 8.2.3.6 High-Risk Species is complete.

8.2.3.7 Vegetation and Fuels Management- Fire-Resilient Right-of-Ways

The purpose of this initiative was to take actions “to promote vegetation communities that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of-way.”¹⁹¹

¹⁸⁹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 686, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹⁹⁰ Data Request OEIS-E-SVM_2025-PG&E-03, question 38; attachment “DRU15478_Audit_DR_OEIS_D001.pdf,” p. 19.

¹⁹¹ Office of Energy Infrastructure Safety, [2023-2025 Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-25, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 11

Statement: “Integrated VM [vegetation management] for transmission, which is not performance driven, promotes desirable, stable, low-growing plant communities that resist invasion by tall growing tree and brush species through appropriate, environmentally sound, and cost-effective control methods. IVM control methods include a combination of chemical, biological, cultural, mechanical, and/or manual treatments.”¹⁹²

Supporting Information and Analysis: PG&E provided an Excel file containing the locations, work completion dates, and the total number of acres treated by the IVM program in 2024.¹⁹³ The Excel file indicated that PG&E treated 4,902 acres of its transmission right of way system using IVM control methods in 2024.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

Statement 12

Statement: “PG&E has an ongoing Transmission ROW Expansion program that is focused on reliability and was initiated in 2017. That program will continue in 2023 but is not directly related to wildfire mitigation. However, to the extent ROWs are being expanded, there will be incremental wildfire mitigation benefits resulting from decreased vegetation around PG&E’s transmission lines.”¹⁹⁴

Supporting Information and Analysis: PG&E provided an Excel file containing the locations, work completion dates, and the total number of Electric Transmission Line (ETL) miles cleared by the ROW Expansion program in 2024.¹⁹⁵ The Excel file indicated that PG&E’s ROW Expansion Program cleared 100 ETL miles along PG&E’s transmission right of way system in 2024.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

¹⁹² Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 687, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

¹⁹³ Data Request OEIS-E-SVM_2025-PG&E-03, question 39; attachment “DRU15478_Q039_Atch01_2024 VM-15-IVM-Work Data.xlsx.”

¹⁹⁴ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 656, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

¹⁹⁵ Data Request OEIS-E-SVM_2025-PG&E-03, question 4; attachment “DRU15478_Q004_Atch01_VMDR-3714_Q4.xlsx.”

Finding – 8.2.3.7 Fire-Resilient Rights-of-Way

PG&E provided information consistent with the completion of work identified in Initiative 8.2.3.7 Fire-Resilient Rights-of-Way. Therefore, Energy Safety concludes that Initiative 8.2.3.7 Fire-Resilient Rights-of-Way is complete.

8.2.3.8 Vegetation and Fuels Management- Emergency Response Vegetation Management

The purpose of this initiative was the “planning and execution of vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration.”¹⁹⁶

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 13

Statement: “Vegetation identified as pending Priority 2 work within the RFW [Red Flag Warning] area will be reviewed and mitigated as outlined in the VM Priority Tag Procedure (TD-7102P-17).”¹⁹⁷

Supporting Information and Analysis: PG&E provided an Excel file containing information on all Priority 2 (P2) work orders that were pending in areas under active Red Flag Warnings (RFWs) in 2024. The file included a unique ID for each P2 work order, the creation and completion dates, the work order location, the dates RFWs were issued in each location, and the dates when constraints prevented PG&E from completing the work.¹⁹⁸

PG&E’s 2023–2025 Wildfire Mitigation Plan (WMP) states that it will review and mitigate P2 work in RFW areas in accordance with PG&E’s Vegetation Management Priority Tag Procedure which states that “Priority 2 tags must be mitigated within 20 business days unless constrained.”¹⁹⁹ To determine if P2 work was completed in accordance with this procedure in 2024, Energy Safety filtered the Excel file for work orders that remained pending for more than 20 business days between the date they were created and the date a RFW was issued, excluding any work orders that had documented constraints during that period or during the

¹⁹⁶ Office of Energy Infrastructure Safety, [Energy Safety's 2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-25, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁹⁷ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, pp. 689-690, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

¹⁹⁸ Data Request OEIS-E-SVM_2025-PG&E-03, question 42; attachment “DRU15478_Q042_Atch01_P2s in 2024 RFW Areas.xlsx.”

¹⁹⁹ Data Request OEIS-E-SVM_2025-PG&E-03, question 43; attachment “DRU15478_Q043_Atch01_TD-7102P-17 Rev 2_ Redacted.pdf.”

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RFW event. This analysis demonstrated that 988 out of 22,998 (4%) P2 work orders with unique IDs were pending work for more than 20 business days without documented constraints at the start of a RFW event, were not actively constrained during an RFW event, and that those work orders were not completed throughout the entirety of a RFW event. Therefore, the information PG&E provided does not indicate that it reviewed and mitigated P2 work in RFW areas as required by its VM Priority Tag Procedure.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this statement.

Statement 14

Statement: “The second phase of VM activities [regarding VM work in post fire areas] are focused on reliability by mitigating hazard trees that have the potential to fail into PG&E assets. PG&E performs a hazard tree assessment of the burned area to determine whether trees pose a threat to electric assets and if they should be abated.”²⁰⁰

Supporting Information and Analysis: PG&E provided an Excel file containing records of hazard tree assessments and vegetation management mitigation work in burn areas in 2024.²⁰¹ The Excel file included details such as the fire associated with the assessment, assessment dates, the type of tree work prescribed as a result of the assessments, the dates the prescribed mitigation work was completed, the work status of the prescribed work, and the priority level associated with each assessed tree. The following table summarizes hazard tree assessments performed in burn areas in 2024 as well as associated mitigation work. Energy Safety considered any tree work in the Excel file with a status of “Not Completed” or “Null” (if work was prescribed) as still pending work.

Trees assessed in 2024	Trees determined to not require work	Trees prescribed mitigation work	Trees with prescribed work completed	Trees still pending work
20,128	1,711	18,417	17,984 (98%)	433 (2%)

The documentation provided demonstrated that PG&E performed hazard tree inspections in burned area; however, the work was not always completed within the timeframes specified in PG&E’s internal procedures.

²⁰⁰ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://www.pge.com/~/media/Files/2023-2025%20Base%20Wildfire%20Mitigation%20Plan.pdf), Published June 7, 2024, p. 690, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²⁰¹ Data Request OEIS-E-SVM_2025-PG&E-03, question 44; attachment “DRU15478_Q044_Atch01_OneVM & AGOL_Q44_20250416.xlsx.”

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PG&E's 2023–2025 WMP references PG&E's Vegetation Management Post Wildfire Procedure TD-7114P-01 which became effective on August 6, 2024. The procedure states that "F1 Immediate priority trees will generally be mitigated within days or weeks of identification,"²⁰² and that F1 trees "...should be mitigated before Maintenance & Construction (M&C) energizes the overhead line."²⁰³ PG&E describes a tree with a F1 condition as a "...vegetation condition that a wildfire has caused and that could result in damage to overhead facilities or interruption of service at any moment."²⁰⁴ Out of the 99 F1 trees that were determined to require work, 95 (96%) were mitigated within 2 weeks and four (4%) were mitigated within one month of identification. On average, F1 trees were mitigated within 5 days of being prescribed work, with a median mitigation time of 1 day; however, four out of 99 (4%) trees were mitigated between 41 and 134 days after prescription. Because these trees represent a high risk to PG&E's system, Energy Safety expects PG&E to mitigate trees with "F1" conditions quickly.

The 433 trees that were still pending mitigation work were identified as having either "F2" or "F3" conditions. PG&E classifies a tree with a F2 condition as "Urgent." An F3 condition is classified as "Non-Urgent." According to PG&E's procedures, F2 trees are generally mitigated within weeks or months of identification, while F3 trees are generally mitigated within months.²⁰⁵ As of May 5, 2025, the date PG&E provided the Excel file to Energy Safety, these trees had been pending mitigation work for between 160 and 333 days, with an average of 247 days and median mitigation time of 248.

The information PG&E provided demonstrated that while it performed hazard tree assessments in burn areas in response to wildfires in 2024, it did not complete mitigations resulting from those inspections in a timely way.

Conclusion: PG&E did not meet the intent of mitigating trees in post wildfire areas with increased risk to PG&E's system in an expedited manner. Trees classified as F1, which should have been mitigated within days or weeks, took up to four months to mitigate. Similarly, trees classified as F2 took nearly a year to mitigate.

Finding – 8.2.3.8 Emergency Response Vegetation Management

PG&E did not provide information consistent with the completion of work identified in Initiative 8.2.3.8 Emergency Response Vegetation Management. Therefore, Energy Safety concludes that Initiative 8.2.3.8 Emergency Response Vegetation Management is deficient.

²⁰² Data Request 265, question 40; attachment "DRU14286_Q040_Atch02_TD-7114P – Post Wildfire Procedure_Redacted.pdf."

²⁰³ Data Request 265, question 40; attachment "DRU14286_Q040_Atch02_TD-7114P – Post Wildfire Procedure_Redacted.pdf."

²⁰⁴ Data Request 265, question 40; attachment "DRU14286_Q040_Atch02_TD-7114P – Post Wildfire Procedure_Redacted.pdf."

²⁰⁵ Data Request 265, question 40; attachment "DRU14286_Q040_Atch02_TD-7114P – Post Wildfire Procedure_Redacted.pdf."

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In response to Energy Safety’s finding related to the delayed mitigation of trees with P2 conditions during RFW events, in its CAP, PG&E must describe any procedures that it implements to mitigate ignition risk associated with trees exhibiting Priority 2 conditions that are pending work during RFW events. PG&E must also identify the actions it plans to implement to ensure that trees with P2 conditions in active RFW areas are reviewed and mitigated as outlined in its VM Priority Tag Procedure.

Regarding hazard tree assessments and mitigation in wildfire affected areas in 2024, PG&E must include in its CAP an updated dataset identifying any trees in burned areas prescribed for mitigation in 2024 that were still pending work at the time of PG&E’s response to Data Request OEIS-E-SVM_2025-PG&E-03. For any work that remains incomplete, PG&E must outline corrective actions to resolve outstanding issues or propose alternative solutions and submit documentation describing the constraints which prevented the completion of this work.

8.2.4 Vegetation Management Enterprise System

The purpose of this initiative was to describe the “Operation of and support for centralized vegetation management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work.”²⁰⁶

²⁰⁶ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-25, URL:

(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

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Quantitative Targets or Commitments, Supporting Information & Analysis, and Conclusion

PG&E included the following objectives in its 2023-2025 WMP.²⁰⁷ For ease of comparison, the WMP objective and work completed are summarized below:

Initiative Activity	PG&E's 2024 Objective	Actual Completed in 2024
One VM Application Record keeping Enhancement- Routine, Second Patrol (VM-19)	Include capability to capture factors for prescribing trees for removal in System of Record	Achieved
Record Keeping Enhancement- VMOM, TRI (VM-20)	Include capability to capture factors for prescribing trees for removal in System of Record	Achieved
FTI Record Keeping Enhancement (VM-21)	Enhance record keeping practices for the FTI Program by creating records of all potential strike trees inspected using a digitized Tree Risk Assessment form	Not achieved

One VM Application Record keeping Enhancement- Routine, Second Patrol (VM-19)

Supporting Information and Analysis: PG&E provided an Excel file containing records of tree removal work prescribed under its Routine and Second Patrol programs in 2024.²⁰⁸ The Excel file included a "Reason for Removal" column, and a column to input additional comments. These comments varied in content, including descriptions of tree defects, instructions for tree crews, or reiterations that a tree was being removed due to grow-in or fall-in risk.

²⁰⁷ Pacific Gas and Electric, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, pp. 647-648, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²⁰⁸ Data Request OEIS-E-SVM_2025-PG&E-03, question 45; attachment "DRU15478_Q045_Atch01_OneVM_Q45 20250416.xlsx."

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Out of 381,314 trees prescribed for removal under PG&E's Routine and Second Patrol programs in 2024, all but two had a documented "Reason for Removal."

Despite the two incomplete records, the Excel file indicated that PG&E's One VM application supported the documentation of removal reasons for its Routine and Second Patrol programs during the 2024 inspection cycle and that VMIs used this capability. Therefore, the information provided by PG&E documented completion of the work identified in this objective.

Conclusion: PG&E provided information consistent with the completion of work identified in this objective.

Record Keeping Enhancement- VMOM, TRI (VM-20)

Supporting Information and Analysis: PG&E provided an Excel file containing records of tree removal work prescribed under its VMOM and TRI programs in 2024.²⁰⁹ The Excel file included two data sets; one for the VMOM Program and one for the TRI Program. The data set containing VMOM Program data included a "Reason for Removal" column, and a column to input additional comments. These comments varied in content, including descriptions of tree defects, instructions for tree crews, or reiterations that a tree was being removed due to grow-in or fall-in risk. The data set indicated that out of 8,281 trees prescribed for removal in 2024, a reason for removal was listed for each prescription. For trees that had a reason for removal of "other," open text comments were provided which described why the tree was prescribed for removal.

The data set containing TRI Program data included a "Reason for Removal" column. The data set indicated that out of 20,848 trees that needed work in 2024, 10,440 did not have a reason for removal. While the Excel file demonstrated not all fields were properly filled out by tree crews performing mitigation work prescribed by the TRI program in 2024, the file demonstrated that PG&E's vegetation management systems of record supported the documentation of removal reasons for PG&E's VMOM and TRI programs during the 2024 inspection cycle and that VMIs used this capability for the majority of removal work prescribed in 2024. Therefore, PG&E completed all work identified in this objective.

Conclusion: PG&E provided information consistent with the completion of work identified in this objective.

²⁰⁹ Data Request OEIS-E-SVM_2025-PG&E-03, question 46; attachment "DRU15478_Q046_Atch01_OneVM_Q46 20250416.xlsx."

FTI Record Keeping Enhancement (VM-21)

Supporting Information and Analysis: In its 2023-2025 WMP, PG&E listed a “method of verification” for this objective which included digitizing a tree risk assessment form and creating a field in its system of record that records the reason for tree removals.²¹⁰ In its 2024 ARC, PG&E reported that it completed its FTI record keeping enhancement objective on March 26, 2024, as it digitized the tree risk assessment form which captured information regarding tree removal reasons.²¹¹ PG&E provided screenshots of the digitized form which Energy Safety reviewed to verify that the form was digitized.²¹²

However, in a data request response on April 22, 2024, PG&E stated “[a]s the [FTI] program has matured, PG&E’s operational approach to FTI was changed to have inspectors fill out a TRAQ form only on those trees likely to fail (either trunk or branch) within the next 15 months and which are accordingly prescribed work.”²¹³

This change in operational practice is inconsistent with the VM-21 objective which states that the digitized tree risk assessment form would be used to create records of all potential strike trees inspected under FTI. This change in operational practice was further reflected in Excel files provided by PG&E, which contained 2024 FTI inspection records.²¹⁴ These Excel files included the location (latitude and longitude) of all potential strike trees inspected in 2024, and indication of whether a digitized tree risk assessment form was completed during each tree inspection and recorded in PG&E’s system of record.

The Excel files indicate that 1,203,745 potential strike trees were inspected under the FTI Program in 2024. However, tree risk assessment forms were completed and recorded for only 95 (<1%) of those trees. PG&E inspectors did not complete tree risk assessment during inspections of inventory trees that did not require work nor during inspections of trees that were prescribed mitigation work, indicating a failure to comply with the procedures described in PG&E’s 2023-2025 WMP and also the updated procedures described in PG&E’s data request response on April 22, 2024.

²¹⁰ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 648, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²¹¹ Pacific Gas and Electric Company, [Annual Report on Compliance R1 For 2024 Wildfire Mitigation Plan](#), Published April 30, 2025, p. 23, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58691&shareable=true>).

²¹² Data Request OEIS-P-WMP_2024-PG&E-001, Question 1; attachment “2024-PG&E-001_Q001_Atch4-Redacted”

²¹³ Data Request OEIS-P-WMP_2024-PG&E-001Rev01, question 1(b); attachment

“TN14275_20240621T210958_WMPDiscovery20232025_DR_OEIS_016Q001Rev01,” p. 3.

²¹⁴ Data Request OEIS-E-SVM_2025-PG&E-03, question 20; attachments

“DRU15478_Q020_Atch01_BA&NC&CC&CV_20250415.xlsx,” “DRU15478_Q020_Atch02_NV_20250415.xlsx,” “DRU15478_Q020_Atch03_SI_20250415.xlsx.”

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The objective of VM-21 was to create consistent records of all potential strike trees inspected by the FTI Program using a standard tree risk assessment. The information PG&E provided does not indicate that this was accomplished.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this objective.

Finding – 8.2.4 Vegetation Management Enterprise System

PG&E did not provide information consistent with the completion of work identified in Initiative 8.2.4 Vegetation Management Enterprise System. Therefore, Energy Safety concludes that Initiative 8.2.4 Vegetation Management Enterprise System is deficient.

In its CAP PG&E must provide corrective actions to ensure that it applies a standard tree risk assessment of potential strike trees inspected by the FTI program in future performance years.

8.2.5 Quality Assurance and Quality Control

The purpose of this initiative was to describe the “Establishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.”²¹⁵

PG&E’s QA/QC activities are outlined in two subsections of its 2023–2025 WMP:

1. Section 8.2.5.1 – Quality Assurance and Quality Verification:
This section covers PG&E’s Quality Verification Vegetation Management (QVVM) program. PG&E states that this program is responsible for validating the effectiveness of vegetation management quality efforts. It does so by auditing “work verification complete” locations, sites previously reviewed under PG&E’s QC program.²¹⁶

²¹⁵ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-25, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

²¹⁶ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 695, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

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2. Section 8.2.5.2 – Quality Control:

This section focuses on PG&E’s work verification program, which evaluates completed inspections and tree work to ensure compliance with PG&E’s standards and procedures.²¹⁷

An analysis of PG&E’s activities under each of these programs in 2024 is provided below.

8.2.5.1 Quality Assurance and Quality Verification

Quantitative Targets or Commitments, Supporting Information & Analysis, and Conclusion

PG&E included the following target in its 2023-2025 WMP.²¹⁸ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	PG&E’s 2024 Target	Actual Completed in 2024
Quality Assurance Distribution Routine VM – HFTD (VM-08)	2,675 audit locations, 95% pass rate	4,477 audit locations, 99.95% pass rate
Quality Assurance Transmission VM – HFTD (VM-08)	1,284 audit locations, 95% pass rate	2,728 audit locations, 99.95% pass rate
Quality Assurance Vegetation Control Pole Clearing – HFTD (VM-08)	1,926 audit locations, 95% pass rate	3,466 audit locations, 99.86% pass rate

Supporting Information and Analysis: PG&E provided an Excel file containing vegetation management QA audit data from 2024. The Excel file included separate data sets of QA audit results for PG&E’s Distribution Routine, Transmission, and Pole Clearing programs.²¹⁹ Each dataset included unique identification numbers for each span that was audited, the location of each audit (latitude and longitude), HFTD designation, and the result of each audit (pass or fail). The Distribution Routine and Transmission program datasets also included the total number of trees inspected at each audit location.

In its 2023–2025 WMP, PG&E defines pass rate for both quality assurance and quality control as “the number of assets reviewed by QC that do not have a Critical Attribute (as defined by

²¹⁷ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p 694, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

²¹⁸ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, pp. 611, 613, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

²¹⁹ Data Request OEIS-E-SVM_2025-PG&E-03, question 47; attachment “DRU15478_Q047_Atch01_2024 YTD ROE Data-VM08-QAP.xlsx,” “DRU15478_Q048_Atch01_2024 YTD ROE Data-VM22-QC.xlsx.”

Appendix 1.

Asset Strategy) failure or miss, divided by the number of assets reviewed by QC.”²²⁰ PG&E calculated the pass rate for its Distribution Routine and Transmission vegetation management programs by dividing the number of trees observed in compliance with PG&E procedures by the total number of trees audited. For its Pole Clearing Program, PG&E calculated the pass rate by dividing the number of pole locations in compliance by the total number of pole locations audited.

Energy Safety used PG&E’s data and methods to independently calculate QA pass rates. Additionally, Energy Safety conducted its own pass rate analysis by dividing the number of audit locations (defined as spans, or the distance between two poles) that passed QA audits by the total number of spans audited for the Distribution Routine and Transmission programs. Pass rate calculations are summarized in the table below.

Program audited for quality assurance	Pass rate based on number of audit locations passed	Pass rate based on number of trees passed
Distribution Routine VM - HFTD	4,468 spans passed audit/4,477 spans audited=99.80%	18,504 tree units passed audit/18,513 audited trees =99.95% pass rate
Transmission VM -HFTD	2,726 spans passed audit/2,728 audited spans=99.93%	5,946 tree units passed audit/5,949 audited trees=99.95% pass rate
Vegetation Control Pole Clearing – HFTD	3,461 pole locations passed audit/ 3,466 audited pole locations=99.86% pass rate	N/A

The information PG&E provided demonstrated that PG&E exceeded its target for the number of QA audit locations for each vegetation management program and achieved its targeted pass rate for each program.

Conclusion: PG&E provided information consistent with the completion of work identified in this target.

²²⁰ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 700, URL: (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

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8.2.5.2 Quality Control

Quantitative Targets or Commitments, Supporting Information & Analysis, and Conclusion

PG&E included the following target in its 2023-2025 WMP.²²¹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	PG&E's 2024 Target	Actual Completed in 2024
Quality Control Distribution Routine VM – HFTD (VM-22)	80,000 audit locations, 88% pass rate	80,931 audit locations, 97% pass rate
Quality Control Transmission VM – HFTD (VM-22)	13,500 audit locations, 92% pass rate	15,897 audit locations, 99% pass rate
Quality Control Vegetation Control Pole Clearing – HFTD (VM-22)	11,500 audit locations, 88% pass rate	21,740 audit locations, 88% pass rate

Supporting Information and Analysis: PG&E provided an Excel file containing vegetation management QC audit data from 2024 which included separate data sets of QC audit results for PG&E's Distribution Routine, Transmission, and Pole Clearing Programs.²²² Each dataset included unique identification numbers for each audit completed, the location of each audit (latitude and longitude), HFTD designation, and the result of each audit (pass or fail). The Distribution Routine and Transmission program datasets also included the total number of trees inspected at each audit location.

As stated above, PG&E defines pass rate for both quality assurance and quality control as “the number of assets reviewed by QC that do not have a Critical Attribute (as defined by Asset Strategy) failure or miss, divided by the number of assets reviewed by QC.”²²³ PG&E calculated the pass rate for quality control on its Distribution Routine and Transmission vegetation management programs the same way it did for quality assurance: by dividing the number of trees observed in compliance with PG&E procedures by the total number of trees

²²¹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, pp. 611, 613, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²²² Data Request OEIS-E-SVM_2025-PG&E-03, question 48; attachment “DRU15478_Q048_Atch01_2024 YTD ROE Data-VM22-QC.xlsx.”

²²³ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 700, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

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audited. For its Pole Clearing Program, the pass rate was determined by dividing the number of pole locations in compliance by the total number of pole locations audited.

Energy Safety used PG&E's data and methods to independently calculate QC pass rates. Additionally, Energy Safety conducted its own pass rate analysis by dividing the number of audit locations (defined as spans, or the distance between two poles) that passed QC audits by the total number of spans audited for the Distribution Routine and Transmission programs. The results of this analysis are summarized in the table below.

Program audited for quality control	Pass rate based on number of audit locations passed	Pass rate based on number of trees passed
Distribution Routine VM - HFTD	74,717 spans passed audit/80,931 audited spans=99.8% pass rate	334,479 tree units passed audit/ 343,470 audited tree units=97% pass rate
Transmission VM -HFTD	15,658 spans passed audit/ 15,897 audited spans=99% pass rate	32,147 tree units passed audit/ 32,444 audited tree units=99% pass rate
Vegetation Control Pole Clearing – HFTD	19,197 poles passed audit/ 21,740 audited poles=88% pass rate	N/A

The information PG&E provided demonstrated that PG&E exceeded its QC targets for the number of QC audit locations for each vegetation management program and achieved its targeted pass rate for each program.

Conclusion: PG&E provided information consistent with the completion of work identified in this target.

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 15

Statement: PG&E included the following goals for its Field Quality Control (FQC) program in 2024.²²⁴ These goals were described in the narrative within section 8.2.5 of PG&E’s 2023-2025 WMP but were not assigned an initiative tracking ID or included as part of PG&E’s 2024 QDR submissions.

Activity	PG&E’s 2024 Goal	Actual Completed in 2024
Field Quality Control (FQC) Distribution Routine	90% sample size, 88% pass rate	99% sample size, 90% pass rate
Field Quality Control (FQC) Second patrol	90% sample size, 88% pass rate	99% sample size, 91% pass rate
Field Quality Control (FQC) Transmission	90% sample size, 88% pass rate	100% sample size, 93% pass rate
Field Quality Control (FQC) Vegetation Control	90% sample size, 88% pass rate	95% sample size, 91% pass rate

Supporting Information and Analysis: In 2024, PG&E’s Vegetation Management FQC program completed “active side by side observations” that audited VMI performing work in support of PG&E’s Vegetation Control, Transmission, Second Patrol, and Routine Distribution Programs.²²⁵ PG&E provided Excel files containing FQC audit results, the amount of eligible VMI audited for each program, and each program’s yearly pass rate for 2024.²²⁶

The Excel files documented that a portion of each audit consisted of an “active side by side observation.” During the active observation, the auditor asked the VMI a series of questions specific to the program the VMI supported. The questions consisted of topics that assessed if the VMI had the necessary tools to perform the required work (e.g. range finder and DBH tape), and if the VMI had knowledge of best management practices and procedures related to

²²⁴ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 704, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

²²⁵ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 703, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

²²⁶ Data Request OEIS-E-SVM_2025-PG&E-03, questions 49-52; attachments "DRU15478_Q049_Atch01_Question 49_Redacted.xlsx," "DRU15478_Q050_Atch01_Question 50_Redacted.xlsx," "DRU15478_Q051_Atch01_Question 51_Redacted.xlsx," "DRU15478_Q052_Atch01_Question 52_Redacted.xlsx."

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the work being performed. The auditor also assessed the vegetation within the area where the active side by side observation occurred to ensure that the VMI prescribed necessary VM work to any vegetation that did not meet PG&E's or other applicable regulatory requirements at the time of inspection. Pass rates were determined based on the responses from the audited VMI during the side-by-side observation process and how effectively the VMI implemented the program's procedures.

As summarized in the table above, the Excel files indicated that the VM FQC program audited over 90% of eligible inspectors in each of the four programs reviewed, and that all four vegetation management programs achieved a yearly pass rate in 2024 that exceeded the 88% target.

Conclusion: PG&E provided information consistent with the completion of work identified in this target.

Statement 17

Statement: "FQC Assessment records (the FQCPM [Field Quality Control Program manager] field observation) are captured in Survey 123. Assessments are summarized in dashboards and metric reports are published on a regular basis. All findings are communicated to the execution teams to provide lessons learned and assist in process improvement. The FQC team has conducted Quality Learning Forums to support the execution teams improved awareness and performance."²²⁷

Supporting Information and Analysis: PG&E provided screenshots of dashboards created with Microsoft Power BI software that summarized the results of its 2024 FQC program.²²⁸ These dashboards break down the FQC audit pass rate results by week and list the top three reasons for audit failures by vegetation management program. Some of the more common reasons for audit failures included:

- VMI did not have minimum required awareness of their responsibility to report abnormal field conditions.
- VMI did not have adequate knowledge of environmental best management procedures.
- VMI did not have the appropriate awareness of program scopes in relation to idle lines.
- VMI did not have the appropriate awareness of program scopes in relation to Priority 2 and imminent threat conditions

²²⁷ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 703, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²²⁸ Data Request OEIS-E-SVM_2025-PG&E-03, question 53; attachment "DRU15478_Q053_Atch01_Q53.docx."

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Additionally, PG&E provided email correspondence from 2024 between PG&E’s FQC and execution teams.²²⁹ The emails indicated that the FQC team shared audit result information with the execution teams in 2024.

Lastly, PG&E provided signed rosters from Quality Learning Forums (QLF) conducted in 2024.²³⁰ The rosters indicated that PG&E held two QLFs in 2024 that were attended by 21 and 14 of PG&E’s staff.

The provided information indicated that PG&E summarized FQC assessment records in dashboards, communicated the information to its execution teams, and held QLFs that summarized common FQC findings.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

Finding – 8.2.5 Quality Assurance and Quality Control

PG&E provided information consistent with the completion of work identified in Initiative 8.2.5 Quality Assurance and Quality Control. Therefore, Energy Safety concludes that Initiative 8.2.5 Quality Assurance and Quality Control is complete.

8.2.6 Open Work Orders

The purpose of this initiative was to describe the “Actions taken to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.”²³¹

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 18

Statement: “If an inspector determines that vegetation is an immediate risk to PG&E facilities the Priority Tag Utility Procedure is followed (TD-7102P-17). Under normal conditions,

²²⁹ Data Request OEIS-E-SVM_2025-PG&E-03, question 54; attachment “DRU15478_Q054_Atch01_Q54_Redacted.pdf.”

²³⁰ Data Request OEIS-E-SVM_2025-PG&E-03, question 55; attachments “DRU15478_Q055_Atch01_FQC_QLFs_2024_Redacted.xlsx,” “DRU15478_Q055_Atch02_QLF_VC_092624_Redacted.pdf,” “DRU15478_Q055_Atch03_QLF_VC_093024_Redacted.pdf.”

²³¹ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-25, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

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Priority 2 tags are issued for vegetation that is within MDR to the electric lines and must be mitigated within 20 business days.”²³²

Supporting Information and Analysis: PG&E’s procedure TD-7102P-17 states that “Priority 2 tags must be mitigated within 20 business days unless constrained.”²³³ As such, Energy Safety’s analysis of timeliness of work orders only considered Priority 2 work orders that were completed more than 20 business days after work was prescribed and did not have a documented work constraint, or work orders that had not been completed within 20 business days of a constraint being resolved as delayed.

PG&E provided an Excel file containing records of all trees identified with a P2 condition in 2024. The Excel file included the following attributes: tree location data (latitude and longitude), the date the P2 condition was identified and mitigation work was prescribed (inspection date), the date the mitigation work was completed (work date), the date by which PG&E was required to complete the mitigation work to maintain compliance with internal procedures (due date per compliance), and the date any constraints preventing the completion of mitigation work were resolved (resolved date).²³⁴ PG&E calculated due date per compliance by either adding 20 business days to inspection date or the resolved date depending on whether a constraint was documented and subsequently resolved.

Energy Safety noted that 133 trees had a mitigation date that was recorded before the trees’ inspection date. PG&E stated that this occurs when a tree was immediately mitigated in the field before the tree was entered into its system. Energy Safety considered the work on these trees as being completed within PG&E’s targeted timeframe.

To determine whether mitigation work was completed in compliance with procedure TD-7102P-17, Energy Safety compared the due date per compliance to the work date. For trees that did not have a recorded work completion date, Energy Safety used the resolved date to determine whether constraints had been resolved or were still active and due date per compliance to assess whether the work was overdue, still pending but within the allowed timeframe, or still pending due to active constraints. Pending work orders had not been resolved as of May 5, 2025, the date that the data was submitted to Energy Safety.

The Excel file indicated that PG&E identified 116,119 trees with P2 conditions in 2024. The following table summarizes the number of those trees that were mitigated following procedure TD-7102P-17 and those still pending work.

²³² Pacific Gas and Electric, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 706, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²³³ Data Request OEIS-E-SVM_2025-PG&E-03, question 43; attachment “DRU15478_Q043_Atch01_TD-7102P-17 Rev 2_ Redacted.pdf.”

²³⁴ Data Request OEIS-E-SVM_2025-PG&E-03, question 58; attachment “DRU15478_Q058_Atch01_VMDR-3714 Q58 Data.xlsx.”

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Timeliness Status	Number of Trees
Work completed on time- Mitigation work completed within 20 business days of work being prescribed	96,921 (83%)
Work completed on time- Mitigation work completed more than 20 business days of work being prescribed due to constraint, but mitigated within 20 business days of constraint being resolved	14,032 (12%)
Work completed but timeline exceeded- Mitigation work completed more than 20 business days of work being prescribed or more than 20 business days from constraints being resolved	2,361 (2%)
Work incomplete and overdue- Constraints resolved but mitigation work still pending	541 (<1%)
Work incomplete but not overdue- due date has not elapsed but mitigation work still pending	119 (<1%)
Work incomplete but constrained- Work pending due to active constraint	2,145 (2%)

The file demonstrated that PG&E completed the majority of its P2 mitigation work on time per its internal procedures (96%). However, 2,902 of the 116,119 trees (2%) identified with P2 conditions in 2024 either exceeded the timeline for completion or were overdue and still pending work, indicating that the mitigation work was not completed in accordance with PG&E’s Priority Tag Utility Procedure (TD-7102P-17). The remaining 2,264 trees (2%) were not yet overdue at the time PG&E submitted the data to Energy Safety (May 5, 2025), either because the work was constrained due to permit requirements or customer refusal, or the constraint was resolved but the 20-business day limit had not yet been exceeded.

As summarized in the table above, 14,032 out of the 116,119 (12%) trees with P2 conditions were mitigated in accordance with PG&E’s Priority Tag Utility Procedure only because the trees were documented as constrained and then mitigated within 20 business days of those constraints being resolved. While PG&E’s Priority Tag Utility Procedure applies a mitigation timeframe for P2 conditions once work has been identified, this timeframe no longer applies if PG&E designates the work as constrained. Consequently, PG&E was able to take between 21 and 277 business days to mitigate these 14,032 trees identified with P2 conditions while still adhering to its Priority Tag Utility Procedure. The table above also summarizes that 2,145 out of the 116,119 (2%) trees with P2 conditions were still pending work at the time of PG&E’s data submission due to work constraints. These 2,145 trees had been pending work between 87 and 336 days as of May 5, 2025. Energy Safety expects PG&E to resolve constrained P2 work as rapidly as possible to meet its targeted mitigation timeframes for all work identified with P2 conditions.

Appendix 1.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this statement.

Statement 19

Statement: “All trees identified for work by pre-inspectors are prioritized. If vegetation is determined to be an immediate risk to PG&E facilities, described as a Priority 1 Condition in the VM Priority Tag Procedure (TD-7102P-17), the condition will be mitigated within 24 hours of identification as long as conditions are safe for the tree crew to proceed with work.”²³⁵

Supporting Information and Analysis: PG&E provided an Excel file containing records of all trees identified with a Priority 1 (P1) condition in 2024.²³⁶ The Excel file included tree location (latitude and longitude), priority designation, the date each tree was identified and prescribed work, and the date the prescribed work was completed. The Excel file indicated that 10,603 trees were identified with a P1 condition in 2024. Based on the Excel file, the following table summarizes how soon after inspection each P1 tree was mitigated.

Timeliness	Number of trees
Mitigated within 24 hours of inspection	10,451 (99%)
Mitigated between 2 and 30 days after inspection	139 (1%)
Mitigated between 31 and 232 days after inspection	13 (<1%)

Energy Safety noted that 143 trees had a mitigation date that was recorded before the tree’s inspection date, PG&E stated that this occurs when a tree was immediately mitigated in the field before the tree was input into its system.²³⁷ Energy Safety included work on these trees to have been mitigated within 24 hours in the table above.

In its 2023-2025 WMP, PG&E committed to mitigating trees with P1 conditions within 24 consecutive hours of identification, without specifying any exceptions for weekends, holidays, or other non-working periods. Based on this mitigation timeframe, Energy Safety determined that 152 P1 trees were not mitigated within the required 24-hour timeframe. For 40 of these trees, the delays occurred over weekends or holidays and six trees were mitigated

²³⁵ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 689, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²³⁶ Data Request OEIS-E-SVM_2025-PG&E-03, question 40; attachment "DRU15478_Q040_Atch01_VMDR-3714 Q40 Data.xlsx."

²³⁷ Data Request OEIS-E-SVM_2025-PG&E-03, question 40; attachment "DRU15478_Audit_DR_OEIS_D001.pdf," p. 20.

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over 24 hours after inspection but less than 2 days. These 46 trees were not considered “overdue” by PG&E.²³⁸

Of the 152 trees identified in PG&E’s Excel file as exceeding the 24-hour timeframe, PG&E provided explanations and supporting documentation for 106. For four of these, mitigation was delayed because nearby power lines required de-energization before crews could safely perform the work, but electrical workers were not immediately available. For the remaining trees with explanation and supporting documentation, PG&E explained that some of the trees were originally assigned to a lower priority level and were later upgraded to P1 status. Once upgraded, the trees were mitigated the same day. However, because the Excel file calculated the duration from the date the work order was first created, regardless of any later priority changes, it appeared that these trees exceeded the 24-hour mitigation timeframe. Additionally, PG&E’s supporting documentation indicated that clerical errors, such as incorrect billing or completion dates, were responsible for the appearance of some delayed mitigation work.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this statement.

Statement 20

Statement: “PG&E has implemented a plan to complete the identified dead/dying tree work [from PG&E’s Second Patrol Program] within 180 days for HFTD areas and within 365 days for non-HFTD areas.”²³⁹

Supporting Information and Analysis: PG&E provided an Excel file containing records of dead or dying trees identified by its Distribution Second Patrol Program in 2024.²⁴⁰ The Excel file included unique identification numbers for each tree, location (latitude and longitude) for each tree, whether each tree was located in a HFTD or non-HFTD location, the date each tree was inspected and prescribed mitigation work, the date mitigation work was completed on each tree, and whether the prescribed mitigation work for each tree was constrained.

The Excel file indicated that PG&E’s Distribution Second Patrol Program identified and prescribed mitigation work to 116,726 dead or dying trees with strike potential to PG&E’s infrastructure in 2024. The following table summarizes the number of those trees that were mitigated within the timeframes outlined in PG&E’s 2023-2025 WMP (within 180 days for HFTD areas and within 365 days for non-HFTD areas). Percentages represent the fraction of the total number of trees recorded (HFTD and non-HFTD).

²³⁸ Data Request OEIS-E-SVM_2025-PG&E-04, question 10; attachment “DRU15952_Audit_DR_OEIS_D001,” p. 9.

²³⁹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 667, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

²⁴⁰ Data Request OEIS-E-SVM_2025-PG&E-03, question 14; attachment “DRU15478_Q014_Atch01_VMDR-3714 Q14 Data.xlsx.”

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Timeliness Status	Number of Trees in HFTD (180 day mitigation timeframe)	Number of Trees in Non-HFTD (365 day mitigation timeframe)	Total Trees
Work completed within targeted timeframe	81,716 (70%)	10,837 (9%)	92,553 (79%)
Work completed outside targeted timeframe	6,359 (5%)	28 (<1%)	6,387 (5%)
Overdue work that is still pending as of May 5, 2025	12,288 (11%)	334 (<1%)	12,622 (11%)
Work still pending, but not yet overdue	2,579 (2%)	2,585 (2%)	5,164 (4%)
TOTAL	102,942	13,784	116,726

The data indicated that 19,009 (16%) dead or dying trees identified by the Distribution Second Patrol Program in 2024 were not mitigated within PG&E’s targeted timeframes. Of these overdue work orders, 6,387 (5%) were complete but work was conducted outside the stated timeframe and mitigation work for 12,622 (11%) trees was pending for longer than PG&E’s targeted mitigation timeframes as of May 5, 2025, the date the dataset was provided to Energy Safety.

PG&E stated that the delayed work was due to constraints.²⁴¹ However, while the Excel file PG&E provided indicated that a majority of the delayed work was due to constraints such as agency permitting requirements and customer refusals, not all overdue mitigation work contained constraint information. As indicated in PG&E’s 2023-2025 WMP, constraints are required to be documented in PG&E’s incident tracking system.²⁴² Without this documentation, it is unclear from the provided information why mitigation work on some trees was delayed.

Energy Safety acknowledges that constraints, such as those listed in PG&E’s provided Excel file, can delay the completion of mitigation work. However, Energy Safety expects PG&E to manage constraints in such a way as to complete mitigation work to reduce risk to its system within the timeframe commitments of its approved WMPs. The provided information indicated that a significant fraction of mitigation work was not mitigated within PG&E’s targeted timeframes and that the reason for the delayed work was not always documented as described in PG&E’s 2023-2025 WMP.

²⁴¹ Data Request OEIS-E-SVM_2025-PG&E-03, question 14; attachment “DRU15478_Audit_DR_OEIS_D001.pdf,” p. 8.

²⁴² Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 669, URL: (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

Appendix 1.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this statement.

Statement 21

Statement: “PG&E’s updated Distribution Vegetation Management Program Standard (TD-7102S 4/20/23) includes a requirement that tree work must be completed within one year (barring external factors) of being listed for work beginning in 2024.”²⁴³

Supporting Information and Analysis: PG&E provided Excel files which documented work prescribed by its distribution vegetation management programs in 2024, including Routine Patrol, Second Patrol, FTI, and VMOM to maintain clearance and mitigate fall-in risk. As the Excel files did not indicate that these trees were identified as having Priority 1 or 2 conditions, did not consist of dead or dying trees identified by PG&E’s Distribution Second Patrol program, and consisted of vegetation management work completed along PG&E’s distribution system, Energy Safety applied PG&E’s stated one year timeframe for completing the work.

Each Excel file included the date that vegetation management work was prescribed, the type of work that was prescribed (e.g., trim, removal), a work date if the prescribed work was completed, and a work completion status for the prescribed work. Energy Safety considered any work in the Excel file with a status of “Not Completed,” “Pending,” or “Null” (if work was prescribed) as still pending work.

The table below summarizes the number of trees, as documented in the Excel files, that were prescribed work by each program, the reason for the work, and the number of those trees for which the prescribed work was either completed more than one year after prescription or remained pending for over a year as of May 5, 2025, the date the data was provided to Energy Safety.

²⁴³ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true), Published June 7, 2024, p. 639, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true).

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Program	Reason for work	# of trees prescribed work	# of trees with prescribed work completed over 1 year after inspection	# of trees with prescribed work still pending work over 1 year
Distribution Routine Patrol ²⁴⁴	Maintain clearance	802,612	1,363 (<1%)	5,276 (<1%)
Distribution Second Patrol ²⁴⁵	Maintain clearance	101,130	179 (<1%)	635 (<1%)
FTI ²⁴⁶	Address Fall-in and Grow-in risk	69,700	32(<1%)	599(<1%)
VMOM ²⁴⁷	Address Fall-in and Grow-in risk	12,869	20(<1%)	184(1%)
TOTAL		986,311	1,594	6,694

The information PG&E provided indicated that PG&E did not complete vegetation management work within a one year timeframe on 8,288 out of 986,311 (1%) trees that were prescribed vegetation management work by its distribution vegetation management programs in 2024. While Energy Safety acknowledges that external factors can impact this timeframe, PG&E did not provide an explanation detailing the reasons for the delays or how it is addressing any constraints that may have prevented timely completion of the mitigation work.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this statement.

²⁴⁴ Analysis based on Data Request OEIS-E-SVM_2025-PG&E-004, question 8; attachment "DRU15952_Q008_Atch01_DRU15478_Q033_Atch01_OneVM_Routine 20250416.xlsx."

²⁴⁵ Data Request OEIS-E-SVM_2025-PG&E-004, question 8; attachment "DRU15952_Q008_Atch02_DRU15478_Q033_Atch02_OneVM_2P_20250416.xlsx."

²⁴⁶ Analysis based on Data Request OEIS-E-SVM_2025-PG&E-03, question 38; "DRU15478_Q038_Atch01_OneVM_Q38.xlsx."

²⁴⁷ Analysis based on Data Request OEIS-E-SVM_2025-PG&E-03, question 38; "DRU15478_Q038_Atch01_OneVM_Q38.xlsx."

Statement 22

Statement: “Routine NERC inspections are prioritized each year so that 100 percent of tree work can be completed by December 31.”²⁴⁸

Supporting Information and Analysis: PG&E provided an Excel file containing records of LiDAR detections from its 2024 routine transmission inspection cycle.²⁴⁹ The Excel file included unique identification numbers for each location that was detected by LiDAR to have a possible vegetation compliance issue, the date each LiDAR detection was visually verified by ground patrols to determine whether vegetation management work was needed at the detection location, the type of vegetation management work prescribed to address vegetation compliance issues discovered at the LiDAR detection locations, and the date any vegetation management work that was prescribed as a result of ground patrol inspections was completed.

Excluding records in the Excel file that were designated with a “no work” prescription or records designated with a “No Trim” priority status, the Excel file indicated that work was assigned to 14,172 trees to address vegetation compliance issues identified at LiDAR detection locations during the 2024 inspection cycle. Of these, mitigation work for 55 trees (<1%) was completed in 2025, and 115 trees (<1%) had no documented completion date (“tree work date”).

Based on this information, PG&E did not demonstrate that 100% of the tree work identified by the NERC Program during the 2024 inspection cycle was completed by December 31, 2024.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this statement.

Finding - 8.2.6 Open Work Orders

PG&E did not provide information consistent with the completion of work identified in Initiative 8.2.6 Open Work Orders. Therefore, Energy Safety concludes that Initiative 8.2.6 Open Work Orders is deficient.

In its CAP, PG&E must provide an update for any of the pending mitigation work identified by Energy Safety in Initiative 8.2.6 Open Work Orders. For work that remains incomplete, PG&E must outline corrective actions to resolve outstanding issues or propose alternative solutions, and submit documentation describing the constraints which prevented the completion of this work. PG&E must also provide corrective actions to prevent similar delays in future performance years.

²⁴⁸ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://www.pge.com/energy-solutions/docs/default-source/wildfire-mitigation-plans/2023-2025-Base-Wildfire-Mitigation-Plan.pdf), Published June 7, 2024, p. 655, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²⁴⁹ Data Request OEIS-E-SVM_2025-PG&E-03, question 3; attachment "DRU15478_Q003_Atch01_ROE2 VMS Inspection Report (FY VM25).xlsx."

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Specific to Energy Safety’s finding related to delayed Priority 1 work, in its CAP, PG&E must provide measures to ensure that mitigation of P1 trees is not delayed due to weekends, holidays, or other non-working periods. It must also describe any processes that PG&E utilizes to ensure consistent tracking of mitigation timeframes across all internal systems and ensure that changes to a tree work order’s priority level do not affect the accuracy of P1 tracking.

8.2.7 Workforce Planning

The purpose of this initiative was to describe “Programs to ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work”²⁵⁰

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 23

Statement: “Required training for FQCPMs [Field Quality Control Program Managers] involves a series of web-based trainings and technical document reviews, facilitated by the FQCPM’s leader or a delegate. The FQCPM Training Program must be completed within the first 12 months of onboarding to a FQCPM position. Training specifications are outlined in Vegetation Management and Systems Inspection Quality Manual.”²⁵¹

Supporting Information and Analysis: PG&E stated that “[t]he quality manual referenced [in Statement 21] was drafted in 2022/23 and was not in use in 2024. Applicable elements of the manual were restructured into the Field Quality Control Business Process Document [BPD] and the Non-profiled Supplemental Attestation Process Standard Work Document.”²⁵² PG&E provided both of these documents as well as an Excel file listing the specific training courses required for Field Quality Control Program Managers (FQCPMs) and the dates when each training became a requirement for the position.²⁵³

²⁵⁰ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-26, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

²⁵¹ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 703, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²⁵² Data Request OEIS-E-SVM_2025-PG&E-03, question 56; attachment “DRU15478_Audit_DR_OEIS_D001.pdf,” p. 28.

²⁵³ Data Request OEIS-E-SVM_2025-PG&E-03, question 56; attachments “DRU15478_Q056_Atch01_2024_FQC_Training.xlsx,” “DRU15478_Q056_Atch02_MID FQC Business Doc_Redacted.pdf,” “DRU15478_Q056_Atch03_Non-Profiled Suppl_Redacted.pdf.”

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PG&E submitted a second Excel file containing training records for its 2024 FQCPM staff.²⁵⁴ This file included the onboarding date for each FQCPM, as well as the completion dates for each applicable training requirement. Upon review of the Excel file, Energy Safety noted that some training requirements were missing training completion dates for some FQCPMs. PG&E stated that this was because those individuals were onboarded before the corresponding training requirements were instituted.²⁵⁵ PG&E also stated that “all PG&E FQCPMs on staff in 2024 have completed the specified training requirements in the BPD...[, but that] records of completion within one year for all training requirements specified in the BPD are not available for some FQCPMs who were onboarded prior to the publication date of the BPD in 2023.”²⁵⁶

Energy Safety confirmed that the two FQCPMs onboarded in 2024 had completed the training requirements that were in effect at the time of their onboarding, either within 12 months of their start date or before onboarding while working for PG&E in another role or contract capacity. However, Energy Safety noted that one of these FQCPMs did not have records of completing six training requirements that were instituted after their onboarding. Because PG&E’s BPD states that “[t]raining requirements at date of hire are to be completed within 12 months,”²⁵⁷ Energy Safety determined that the absence of these records did not demonstrate a divergence from PG&E’s internal procedures as the requirements were not in effect at the time of hire. However, Energy Safety expects PG&E to ensure the employee completes these additional training courses to maintain consistency across its FQCPM workforce.

Although the information PG&E provided did not demonstrate that all 2024 FQCPMs had completed every training requirement listed in the BPD, Energy Safety found no language in the BPD that outlines procedures for ensuring that employees complete training requirements introduced after their onboarding. Energy Safety concluded that PG&E adhered to its internal procedures. Energy Safety expects PG&E to further develop its FQCPM training program by ensuring that all FQCPMs complete the current training requirements, regardless of onboarding date, and that the completion of these trainings is recorded in PG&E’s system of record.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

²⁵⁴ Data Request OEIS-E-SVM_2025-PG&E-03, question 57; attachment “DRU15478_Q057_Atch01_Question 57_Redacted.xlsx.”

²⁵⁵ Data Request OEIS-E-SVM_2025-PG&E-03, question 57; attachment “DRU15478_Q057_Atch01_Question 57_Redacted.xlsx.”

²⁵⁶ Data Request OEIS-E-SVM_2025-PG&E-03, question 57; attachment “DRU15478_Audit_DR_OEIS_D001.pdf,” p. 28.

²⁵⁷ Data Request OEIS-E-SVM_2025-PG&E-03, question 56; attachment “DRU15478_Q056_Atch02_MID FQC Business Doc_Redacted.pdf,” p. 3.

Statement 24

Statement: PG&E uses the completion of VMI Basics training to ensure minimum qualifications are met before contractors can perform work in the field."²⁵⁸

Supporting Information and Analysis: Energy Safety requested VMI Basics training records from PG&E's contracted staff in 2024. PG&E provided such records. However, it stated that "...prior to the implementation and rollout of the VM Basics courses in 2024, individuals were required to complete VEGM-0110 [the final skill assessment required to pass VMI Basics training], an action that is now obsolete, before receiving production access to the VM software. Contractors are now able to access OneVM production [and prescribe work in the field] once they complete their OneVM training, separate from the VM Basic courses."²⁵⁹

Upon request of updated procedures regarding VMI eligibility to use OneVM production and in turn begin prescribing tree work in the field, PG&E stated that it does not have procedural documents or contract language that outlines contractor requirements related to the necessary training that must be completed before gaining access to OneVM production.²⁶⁰ However, PG&E did provide a screenshot of its SharePoint website which provides instructions for gaining OneVM production access and lists course requirements that must be fulfilled before receiving OneVM production access that allows VMIs to begin prescribing work in the field.

PG&E provided an Excel file containing training records from vegetation management contractor staff onboarded in 2024.²⁶¹ The Excel file indicated that 9 out of 624 (1%) VMIs that were contracted by PG&E in 2024 did not complete required One VM training prior to receiving OneVM production access.

PG&E stated that as of July 2, 2025, eight of the employees with incomplete training records have completed the required training and that one VMI is no longer a contractor with PG&E.²⁶² However, this corrective action does not change the fact that VMI were granted OneVM production access and had the ability to perform fieldwork prior to meeting minimum qualifications.

²⁵⁸ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 711, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²⁵⁹ Data Request OEIS-E-SVM_2025-PG&E-03, question 59; attachment "DRU15478_Audit_DR_OEIS_D001.pdf," p. 29.

²⁶⁰ Data Request OEIS-E-SVM_2025-PG&E-004, question 13; attachment "DRU15952_Audit_DR_OEIS_D001.pdf," p. 10.

²⁶¹ Data Request OEIS-E-SVM_2025-PG&E-004, question 13; attachment "DRU15952_Q013_ATch02_VMDR-3942 data_Q13_Redacted.xlsx"

²⁶² Data Request OEIS-E-SVM_2025-PG&E-004, question 13; attachment "DRU15952_Audit_DR_OEIS_D001.pdf," p. 11.

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Conclusion: PG&E did not provide information consistent with the completion of work identified in this statement.

Statement 25

Statement: “PG&E will update [its] basic VM course list in 2023. Until the course list is finalized, VM workers will be following the learning path in Table PG&E-8.2.7-1 [of its 2023-2025 WMP].”

Supporting Information and Analysis: PG&E provided its updated VM course list as well as an Excel file containing training records of its 2024 vegetation management contract and internal staff.²⁶³ The Excel file included the names of its 2024 vegetation management staff and whether each staff member was up to date with the training requirements included in PG&E’s updated vegetation management course list. The Excel file indicated that all vegetation management employees were either “current” with required vegetation management training or had “Upcoming/Expiring” training requirements. The Excel file did not indicate that any of the employees had overdue or incomplete training requirements.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

Statement 26

Statement: “to bolster recruitment and the pipeline of qualified personnel, we have partnered with the International Brotherhood of Electrical Workers and educational institutions, such as the California Community College system, to establish a training program designed to provide the skills and knowledge necessary to perform tree crew work safely and competently.”²⁶⁴

Supporting Information and Analysis: PG&E provided a flyer used in 2024 that promoted utility line clearance arborist and utility vegetation management pre-inspector training programs.²⁶⁵ The flyers indicated that the courses were sponsored by PG&E, hosted at community colleges throughout California and offered training relevant to utility vegetation management.

PG&E also provided a status summary of the training cohorts from 2023 through February 2025. During this period, 243 individuals completed the arborist training course, and 227

²⁶³ Data Request OEIS-E-SVM_2025-PG&E-03, question 60; attachment “DRU15478_Q060_Atch01_VM Basic Training Rate_Redacted.xlsx,” Data Request 265, question 60; attachment “DRU14286_Audit_DR_OEIS_D001.pdf,” p. 26.

²⁶⁴ Pacific Gas and Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 712, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²⁶⁵ Data Request OEIS-E-SVM_2025-PG&E-03, question 63; attachment “DRU15478_Q063_Atch01_PGE flyer ULCAT and UVMPI.pdf.”

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completed the pre-inspector training course. Of those, 73 arborist trainees and 92 pre-inspector trainees were hired into the utility vegetation management industry.²⁶⁶

Lastly, PG&E provided screenshots of calendar invites from 2024 where PG&E had discussions with the International Brotherhood of Electrical Workers (IBEW) and/or JATC (Joint Apprenticeship Training Committee) regarding training programs.²⁶⁷ The screenshots indicated that PG&E met with the IBEW and/or JATC six times in 2024 to collaborate on training and assessment topics related to utility vegetation management.

Conclusion: PG&E provided information consistent with the completion of work identified in this statement.

Statement 27

Statement: “We are increasing the number of TRAQ inspectors, and our current plan is that FTI Inspections will be performed by 100 percent TRAQ certified arborists.”²⁶⁸

Supporting Information and Analysis: PG&E provided an Excel file containing training records for all Vegetation Management Inspectors (VMIs) that conducted FTI inspections in 2024.²⁶⁹ The file listed each VMI and included a column titled “Knowledge Status,” which indicated whether the individual held International Society of Arboriculture (ISA) Arborist credential (a prerequisite for Tree Risk Assessment Qualification [TRAQ]) as well as TRAQ certification.

PG&E stated that it verified each VMI’s credentials by requiring them to upload a photo of their ISA Arborist certificate to PG&E’s system of record. A supervisor then reviewed the uploaded documents to confirm the certifications.

The Excel file indicated that out of 468 VMIs who performed FTI inspections in 2024, only two had incomplete records related to ISA Arborist TRAQ certification standing. For one of those individuals, the file indicated that they were an ISA Certified Arborist but did not hold a TRAQ certificate. The second VMI had three separate records: one indicating ISA certification, one

²⁶⁶ Data Request OEIS-E-SVM_2025-PG&E-03, question 63; attachment “DRU15478_Q063_Atch02_02.13.25_Delivery_ULCAT_UVM PI.pdf.”

²⁶⁷ Data Request OEIS-E-SVM_2025-PG&E-03, question 63; attachments “DRU15478_Q063_Atch03_01.18.24_Session_PGE_IBEW_JATC_Redacted.pdf,” “DRU15478_Q063_Atch04_01.23.24_Session_PGE_IBEW_JATC_Redacted.pdf,” “DRU15478_Q063_Atch05_02.09.24_JATC_PG&E Session_Redacted.pdf,” “DRU15478_Q063_Atch06_02.13.24_JATC & PG&E Session_Redacted.pdf,” “DRU15478_Q063_Atch07_09.30.24_VM Training&Assessment_Redacted.pdf,” “DRU15478_Q063_Atch08_11.20.24_IBEW Meeting_Redacted.pdf.”

²⁶⁸ PG&E, [2023-2025 Base Wildfire Mitigation Plan Revision 4-1](#), Published June 7, 2024, p. 644 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>).

²⁶⁹ Data Request OEIS-E-SVM_2025-PG&E-03, question 21; attachment “DRU15478_Q021_Atch01_VMDR-3714 Qualification 2024_Redacted.xlsx.”

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indicating TRAQ certification, and a third that contradicted the others by stating the individual was not an ISA Certified Arborist.

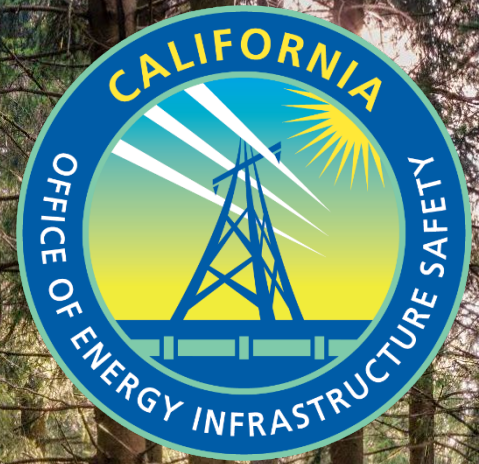
Due to these two incomplete records, the provided information did not support that PG&E implemented its plan to have 100 percent of FTI inspections performed by TRAQ certified arborists.

Conclusion: PG&E did not provide information consistent with the completion of work identified in this statement.

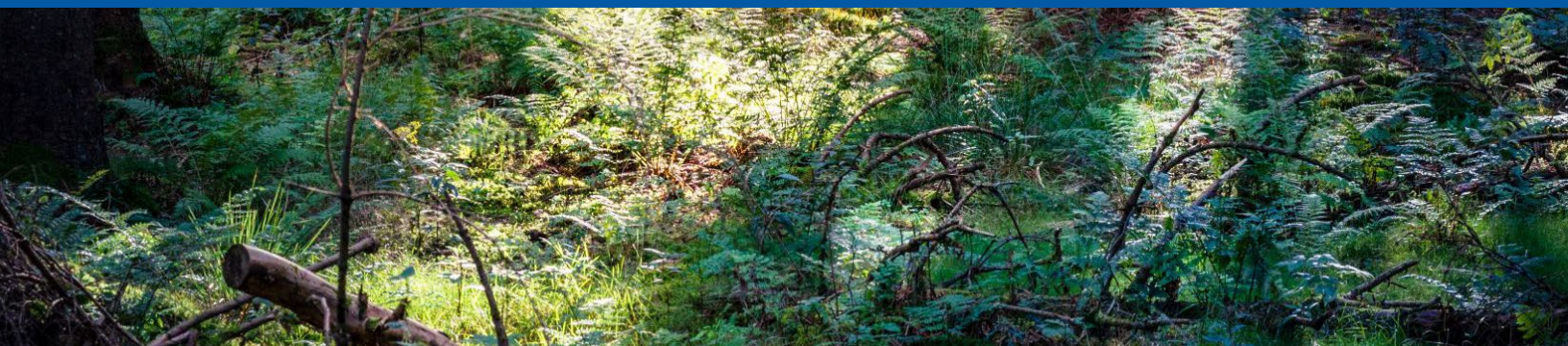
Finding - 8.2.7 Workforce Planning

PG&E did not provide information consistent with the completion of work identified in Initiative 8.2.7 Workforce Planning. Therefore, Energy Safety concludes that Initiative 8.2.7 Workforce Planning is deficient.

In its CAP, PG&E must provide corrective measures that prevent VMIs from gaining access to OneVM production and beginning work in the field prior to completing all training requirements. PG&E must also provide updated records for the two VMI working under PG&E's FTI program in 2024 with incomplete or conflicting TRAQ certification records.



APPENDIX 2. Pacific Gas & Electric Company 2024 Vegetation Management Audit Corrective Action Plan



APPENDIX DESCRIPTION

PG&E submitted its CAP to Energy Safety on November 14, 2025. This appendix reproduces that CAP response in its entirety.



Daniel Kushner, PhD
Senior Director, Electric Risk & Compliance

300 Lakeside Dr.
Oakland, CA 94612
Email: Daniel.Kushner@pge.com

November 14, 2025

Attn: Sheryl Bilbrey; Program Manager, Environmental Science Division
Office of Energy Infrastructure Safety
California Natural Resource Agency
715 P Street, 15th Floor
Sacramento, CA 95814

Subject: PG&E 2024 WMP Vegetation Management Audit Corrective Action Plan

Dear Ms. Bilbrey:

This letter is in response to the Office of Energy Infrastructure Safety's (Energy Safety) 2024 Wildfire Mitigation Plan (WMP) vegetation management audit for Pacific Gas and Electric Company (PG&E), issued on October 14, 2025. The audit evaluated "vegetation management qualitative statements and quantitative commitments" in PG&E's 2023-2025 WMP to determine "whether PG&E completed the required work" for each of those commitments and statements.¹ In its audit, Energy Safety found that PG&E did not provide information consistent with the completion of all targeted work for seven of the thirteen initiatives during the 2024 performance year.

Energy Safety concluded that PG&E demonstrated compliance with 26 out of the 40 (or 65% of) VM commitments/verifiable statements in our 2023-2025 WMP. Additionally, Energy Safety identified seven instances where we did not provide information consistent with the completion of all targeted work. We appreciate the opportunity to provide our response. Below, please find PG&E's corrective action plan response on the identified 16 findings.

We note that in a number of instances, the supporting documentation originally provided in response to Energy Safety data requests was not sufficient. To prevent this from happening in the future, we look forward to continued collaboration with Energy Safety to ensure alignment with the intent of each data request. Our goal will continue to be to provide sufficient information as requested, so that we can be fully responsive. In response to the 2024 WMP VM Audit Report, evidence of documentation to support completion of the 2024 WMP vegetation management initiative commitments are provided in this letter.

Please do not hesitate to contact Daniel.Kushner@pge.com if you have any questions regarding this response.

Sincerely,

Daniel Kushner, PhD
Senior Director, Electric Risk & Compliance

cc: Karen McLaughlin, Energy Safety
Alec Latuszek, Energy Safety
Environmental Science Division

¹ Energy Safety's Audit of PG&E's 2024 WMP Vegetation Management Audit Report at 1.



Daniel Kushner, PhD
Senior Director, Electric Risk & Compliance

300 Lakeside Dr.
Oakland, CA 94612
Email: Daniel.Kushner@pge.com

Corrective Action Plan Response

Energy Safety requested that PG&E submit a corrective action plan in response to the 16 findings. For each item, we provide the 2024 Vegetation Management Initiative, Energy Safety’s finding, the corrective action, and our response.

Finding	8.2.2 Vegetation Management Inspections
Vegetation Management Initiative	8.2.2.2.1 Distribution Routine Patrol (VM-16)
Finding No. 01	PG&E did not provide information consistent with the completion of work identified in 8.2.2.2.1 Distribution Routine Patrol, 8.2.2.2.2 Distribution Second Patrol, 8.2.2.2.5 Focused Tree Inspections, and 8.2.2.2.4 Tree Removal Inventory. Therefore, Energy Safety concludes that Initiative 8.2.2 Vegetation Management Inspections is deficient.
Corrective Action(s)	In response to Energy Safety’s findings related to PG&E’s Distribution Routine and Second Patrol program targets, PG&E must explain in its CAP why, despite using ED GIS data to establish its VM-16 and VM-17 targets in circuit miles, it was unable to track progress toward these targets using the ED GIS system in 2024. PG&E must also clarify how it ensured that the span miles completed, based on its system of record (One VM), were equivalent to the projected number of circuit miles for VM-16 and VM-17. PG&E must further demonstrate that no areas within the scope of these targets were missed as a result of using a different system of record and unit of measure to track progress. Finally, PG&E must include corrective measures to ensure that, moving forward, progress for each target is tracked using the same unit of measure specified in its approved WMPs.

Response to Finding No. 01:

PG&E disagrees with this finding. PG&E provided information demonstrating inspection completion of all distribution mileage identified within One VM, our system of record. VM remains committed to continuous improvements of our system of record.

For further evidence that we reviewed all span miles within our One VM system of record for VM-16, please see the following for a full view of all WOLI statuses.

As reflected in the data, all spans in One VM for VM-16 had a WOLI status assigned, and all WOLI statuses align with our definition of the work being either complete, unnecessary (see “Not Found WOLI status breakdown below), or constrained due to external factors. For these reasons, our perspective is that all available miles in the system for VM-16 were assessed.

The following spreadsheets include 78,308 span miles with a ‘WOLI_STATUS’ (Column M) of ‘Approved’ or ‘Inspected’, 1,302 span miles with a ‘WOLI_STATUS’ of ‘Not Found’, and 69 span

miles with a 'WOLI_STATUS' of 'Constrained' resulting in a total of 79,678 span miles covered by Routine Distribution in 2024. These spreadsheets contain only unique span IDs

- *PGE_2024_WMP_VM_Audit_20251114_Response_F01_Atch01.xlsx*
- *PGE_2024_WMP_VM_Audit_20251114_Response_F01_Atch02.xlsx*
- *PGE_2024_WMP_VM_Audit_20251114_Response_F01_Atch03.xlsx*

The WOLI status 'Not Found' span miles can be further broken down by filtering Column W for the 'Not Found Reason', which can include 'Not Found', 'New Construction', 'Null', 'EDGIS Mapping Error', 'Other', 'Underground', and 'Wildfire Damaged Area'. We acknowledge the opportunity to streamline and better define the 'Not Found' categories going forward. Please see current definitions of 'Not Found' categories below. Inspection dates are located in Column L 'Insp_Date':

- Not Found – User did not find the One VM span in the field.
- New Construction – Pole and lines under installation before being connected to actual power source (i.e. not yet energized).
- Null – Data Integration issue between Salesforce (One VM) and our previous VMARS database at the time the snapshot was taken, which has since been resolved
- EDGIS Mapping Error – Location of span does not correspond to support structures or is so far off that it is not in the same area as the actual span. Inspectors have two options to identify these discrepancies – see below for more information.
- Other – The span cannot be categorized under the other "Not Found" reasons listed here.
- Underground – Span has been undergrounded.
- Wildfire Damaged Area – Span no longer exists due to wildfire damage.

Please see below for further information regarding EDGIS Circuit Miles and Span Miles:

EDGIS is a geospatial system used to track assets and electric network connectivity. The EDGIS system contains information on assets like poles, conductors, undergrounded assets, conductor segments (physical wire), and the length of those segments. EDGIS is not designed to track work progress. The way physical wires are captured in EDGIS can change often and do not always match the assets that are in the field at a given point in time.

- In its calculation for total mileage, EDGIS counts line distances multiple times where there are multiple assets on the same span. EDGIS also utilizes a 'single line diagram' style to provide visual clarity on maps, meaning the conductor diagram lines can deviate from the real-world straight-line paths between assets.

The VM system of record for inspections has always been external to EDGIS. Presently, we utilize a work management system, One VM, that calculates mileage based on an algorithm across EDGIS pole-to-pole distances known as spans, which is a unit of measurement that does not exist within EDGIS.

- The One VM algorithm calculates the span mileage simply as the straight-line distance between two poles, only counting the distance once, even if parallel assets exist on those poles (e.g., parallel primary conductors)

Please see Figures 1-3 below for examples of differences in mileage calculations between EDGIS and One VM, illustrating why circuit miles are not always directly convertible into span miles:

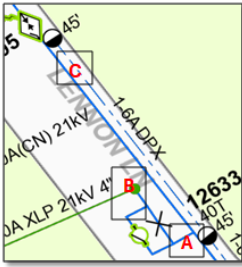


Figure 1

A. Fuse (black x) in parallel with a bypass switch (green circle)

B. Transition from overhead (blue) to underground (green)

C. Secondary conductor (dashed line) in parallel with primary conductor (solid line)

The VM Span length is 164 ft whereas primary conductor length in span is 171 ft and total conductor length in span is 335 ft.

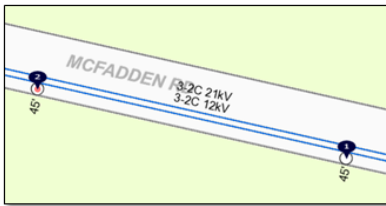


Figure 2

Figure 2 shows **parallel primary conductors** on different circuits in the same two-pole span. **The VM Span length is 298.5 ft whereas primary conductor length in span is 597 ft.**

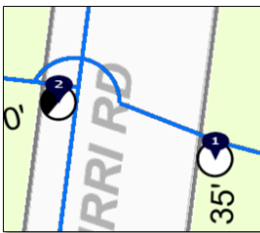


Figure 3

Figure 3 shows an **arc-shaped conductor line** drawn in EDGIS, which is included to identify where the connection is electrically. **The VM Span length is 56 ft whereas primary conductor length in span is 77 ft.**

As stated above, VM manages work at the span level, and the One VM span miles were developed strictly by pole-to-pole / pole-to-structure definitions, resulting in an interpretation of the lines that can be updated over time based on inspector observations in the field and better reflect what is found in the field during inspections. When an inspector identifies discrepancies between their One VM span map and what they see in the field, they follow one of the two options below:

- Span Addition Details
 - The inspector will draw in the missing span on the One VM map and perform an inspection on that span. Drawing the span into the map allows the inspector to perform inspections on that span, create vegetation points, and prescriptions as necessary. The new span will then go through the Span Maintenance process for review.

- Span Removal Details
 - The inspector must verify that the overhead asset is no longer present and therefore vegetation management is no longer required on the span. The inspector will then remove that span from the One VM map and the span removal will go through the Span Maintenance process for review.

Based on the information above, please note that the One VM pole-to-pole / pole-to-structure span does closely match EDGIS, however, there is still a small variance. Our recent analysis shows that there is approximately a 1% difference in total Conductor Miles (EDGIS) and total VM Span Miles (One VM).

Given that there is a small variance between One VM span miles and EDGIS circuit miles, VM continues to consider this target for VM-16 as complete due to all inspections being met per the VM system of record.

Moving forward, VM is committed to continuously enhancing our tools and processes to improve accuracy and transparency. VM plans to implement the following initiatives in the future:

- VM will improve the definition of mileage, providing increased visibility into the lineage of the data. This means clearly identifying the origin and flow of the data from both the EDGIS and One VM systems.
- VM will continue to assess the feasibility of aligning EDGIS conductor segments to One VM spans, which would further improve the alignment of our asset tracking system EDGIS with our work management systems like One VM.

Finding	8.2.2 Vegetation Management Inspections
Vegetation Management Initiative	8.2.2.2.1 Distribution Second Patrol (VM-17)
Finding No. 02	PG&E did not provide information consistent with the completion of work identified in 8.2.2.2.1 Distribution Routine Patrol, 8.2.2.2.2 Distribution Second Patrol, 8.2.2.2.5 Focused Tree Inspections, and 8.2.2.2.4 Tree Removal Inventory. Therefore, Energy Safety concludes that Initiative 8.2.2 Vegetation Management Inspections is deficient.
Corrective Action(s)	In response to Energy Safety’s findings related to PG&E’s Distribution Routine and Second Patrol program targets, PG&E must explain in its CAP why, despite using ED GIS data to establish its VM-16 and VM-17 targets in circuit miles, it was unable to track progress toward these targets using the ED GIS system in 2024. PG&E must also clarify how it ensured that the span miles completed, based on its system of record (One VM), were equivalent to the projected number of circuit miles for VM-16 and VM-17. PG&E must further demonstrate that no areas within the scope of these targets were missed as a result of using a different system of record and unit of measure to track progress. Finally, PG&E must include corrective measures to ensure that, moving forward, progress for each target is tracked using the same unit of measure specified in its approved WMPs.

Response to Finding No. 02:

PG&E disagrees with this finding. PG&E provided information demonstrating second patrol inspection completion of all distribution mileage identified within One VM, our system of record. VM remains committed to continuous improvements of our system of record.

Please see the above response to the finding for Initiative 8.2.2.2.1 Distribution Routine Patrol (VM-16) for additional context on mileage completion and the unit of measurement.

For further evidence that we reviewed all span miles within our One VM system of record for VM-17, please see 'PGE_2024_WMP_VM_Audit_20251114_Response_F02_Atch01.xlsx' for the full walk. This spreadsheet includes 25,519 span miles with a 'WOLI_STATUS' (Column M) of 'Approved' or 'Inspected', 748 span miles with a 'WOLI_STATUS' of 'Not Found', and 61 span miles with a 'WOLI_STATUS' of 'Constrained' resulting in a total of 26,328 span miles covered by Routine Distribution in 2024. This spreadsheet contains only unique span IDs

- The 'Not Found' span miles can be further broken down by filtering Column W for the 'Not Found Reason', which can include 'Not Found', 'New Construction', 'Null', 'EDGIS Mapping Error', 'Other', 'Underground', and 'Wildfire Damaged Area'. Please see the above response to the finding for Initiative 8.2.2.2.1 Distribution Routine Patrol (VM-16) for definitions of 'Not Found' categories.
- Inspection dates are located in Column L 'INSP_DATE'

VM continues to consider this target for VM-17 as complete due to inspections being met and exceeded per the VM system of record.

Finding	8.2.2 Vegetation Management Inspections
Vegetation Management Initiative	8.2.2.2.4 TRI Recordkeeping
Finding No. 03	PG&E did not provide information consistent with the completion of work identified in 8.2.2.2.1 Distribution Routine Patrol, 8.2.2.2.2 Distribution Second Patrol, 8.2.2.2.5 Focused Tree Inspections, and 8.2.2.2.4 Tree Removal Inventory. Therefore, Energy Safety concludes that Initiative 8.2.2 Vegetation Management Inspections is deficient
Corrective Action(s)	In response to Energy Safety's finding of incomplete recordkeeping associated with PG&E's TRI program, PG&E must provide in its CAP, an updated dataset for the 91 trees that were missing required TRAQ form documentation. This dataset must demonstrate either that a TRAQ form has since been completed for each of these trees, or that corrective actions have been planned to ensure any remaining recordkeeping issues will be resolved.
Statement 2	Statement 2: "The Tree Removal Inventory Program digitally records data into a system called Field Maps. The data entered into the system includes information about Level 2 inspections. Our current procedure requires that a photograph of the TRAQ form is taken after the inspection is completed for digital record keeping purposes if the TRAQ certified arborist determines abatement is not required."

Response to Finding No. 03:

PG&E acknowledges this finding. PG&E provided TRAQ documentation for 99.9% of the trees reviewed. However, of the 5,658 trees assessed in 2024, PG&E asserts that only 8 trees (0.1%) did not have a completed TRAQ form uploaded. Of those 8, 3 trees in “Hold” status had TRAQ forms completed but not uploaded, and 5 trees are constrained.

For the 91 trees flagged for missing TRAQ forms, we describe the status below:

- 9 trees already had TRAQ forms attached.
 - 2 trees were pruned and no longer present a strike potential to PG&E facilities. However, moving forward, this classification will require a form to be attached to ensure proper documentation. The trees that require TRAQ forms are now reflected in the excel titled: “*PGE_2024_WMP_VM_Audit_20251114_Response_F03_Atch01.xlsx*”
- 13 trees were reported as removed in 2023 (No TRAQ required because the trees were already removed on other VM programs.)
- 5 trees are constrained (Refusal or hold – Non-TRAQ constraint which is delaying us from completing any work)
- 3 trees were already worked (No TRAQ Required - Claimable in 2025)
- 40 trees were Delisted - Tree already removed (No TRAQ Required - Claimable in 2025)
- 5 trees were Delisted – No Facility (No TRAQ Required - Claimable in 2025)
- 9 trees were listed as No work – TRI PI Performed (No TRAQ Required)
- 3 trees were listed as Hold – Pending TRAQ reassessment (TRAQ Forms completed, but missing attachment)
- 3 trees were listed as Pending – TRI PI Performed (No TRAQ Required because no changes were made to the prescription)
- 1 tree was identified as a test location that should be excluded from the data count, under Veg Point VP_AP122-P22_1766565_2020.

Finding	8.2.2 Vegetation Management Inspections
Vegetation Management Initiative	8.2.2.2.5 Focused Trees Inspections (VM-03)
Finding No. 04	PG&E did not provide information consistent with the completion of work identified in 8.2.2.2.1 Distribution Routine Patrol, 8.2.2.2.2 Distribution Second Patrol, 8.2.2.2.5 Focused Tree Inspections, and 8.2.2.2.4 Tree Removal Inventory. Therefore, Energy Safety concludes that Initiative 8.2.2 Vegetation Management Inspections is deficient
Corrective Action(s)	In response to Energy Safety’s findings related to PG&E’s absence of level two inspection records for its FTI program, PG&E must explain in its CAP the decision-making process that led to not documenting or performing level 2 inspections for all potential strike trees included in the 2024 FTI target, and how it plans to inspect and document potential strike trees during FTI inspections in future performance years.

Response to Finding No. 04:

PG&E disagrees with the finding that less than 1% of the FTI trees were inspected utilizing the Level 2 methodology. There were inconsistencies in how Level 2 inspections were documented throughout 2024. However, even with mid-year process changes, 73% of the data provided to Energy Safety demonstrates that a Level 2 inspection was completed. The remaining Level 2 inspections are implicitly validated through acknowledgement of inspection completions as defined in our procedures.

The following updates to the FTI process and procedure throughout 2024 resulted in inconsistencies in capturing/flagging that Level 2 inspections were being completed by inspectors for trees inspected within FTI.

In 2024, we completed an enhancement to the One VM application that allowed inspectors to check a box to confirm Level 2 inspections were being completed. This enhancement allowed for improved record-keeping practices and also introduced the ability to have a True/False field in the data pulled for FTI to confirm if Level 2 inspections were completed. FTI inspectors were informed of this enhancement via an FTI Supplemental Guide that was rolled out concurrently with the FTI Bulletin, TD-7102P-01-B041, on 07/24/24. The supplemental guide provided inspectors with a note stating that all FTI Veg Points need a prescription record stating a Level 2 inspection had been completed and also provided directions to toggle 'On' for the Level 2 inspection button within the One VM application. This messaging carried over into 2025, when we released Revision 3 of the FTI Procedure along with an updated revision of the FTI Supplemental Guide in February 2025.

Prior to that improvement, field inspectors were required to document the completion of Level 2 inspections within the comment section of the inspection, which was essentially an open text field. The instructions to document the completion of Level 2 inspections in the comment field for all trees were delivered on 4/16/2024 via an internal guidance document.

In the datasets provided herein, we provide the "Inspected Comments" and "Prescription Comments" fields for additional context. When considering these comments in addition to the Level 2 inspection button implemented in One VM mid-year ("PrescripL2InspComp"), we can show that our inspectors did perform a Level 2 inspection on 874,028 VPs, meaning we can prove demonstrate that 73% of the FTI trees in the dataset provided did receive the Level 2 inspection. We consider the remaining Level 2 inspections validated through acknowledgement of inspection completions as defined in our procedures. With the new processes put in place in 2024, we expect more consistent data in future years.

Please see below for a breakdown by spreadsheet for Level 2 flags. Note: Due to constraint resolutions, additional prescriptions following quality patrol, as well as work carried over from 2024, our repull of the data yielded additional prescriptions for FTI in 2024.

- A. Please see "*PGE_2024_WMP_VM_Audit_20251114_Response_F04_Atch01_VMDR-4304_Q4_BA_NC_CC_CVRefresh_20251022.xlsx*" in the Attachments folder. Total L2 inspections complete in this file: 242,311 trees (The sum of bullet points 1, 2, 3, and 4).
 1. 202,996 trees
 - a. "PrescripL2InspComp" (Column M) set to 'True'
 - b. "VM_Inspected_Comments_c" (Column AE) filtered to "No Fill"
 - c. "VM_Prescription_Comments_c" (Column AF) filtered to "No Fill"

2. 37,806 trees
 - a. "PrescripL2InspComp" (Column M) set to 'False'
 - b. "VM_Inspected_Comments_c" (Column AE) filtered to "Yellow"
 - c. "VM_Prescription_Comments_c"(Column AF) filtered to "No Fill"
 3. 329 trees
 - a. "PrescripL2InspComp" (Column M) set to 'False'
 - b. "VM_Inspected_Comments_c" (Column AE) filtered to "No Fill"
 - c. "VM_Prescription_Comments_c" (Column AF) filtered to "Yellow"
 4. 1,180 trees
 - a. "PrescripL2InspComp" (Column M) set to 'False'
 - b. "VM_Inspected_Comments_c" (Column AE) filtered to "Yellow"
 - c. "VM_Prescription_Comments_c" (Column AF) filtered to Yellow"
- B. Please see "*PGE_2024_WMP_VM_Audit_20251114_Response_F04_Atch02_VMDR-4304_Q4_NorthValleyRefresh_20251022.xlsx*" in the Attachments folder for the total of L2 Inspection Complete – Total: 234,482 (The sum of bullet points 5, 6, 7, and 8).
5. 182,625 trees
 - a. "PrescripL2InspComp" (Column M) set to 'True'
 - b. "VM_Inspected_Comments_c" (Column AE) filtered to "No Fill"
 - c. "VM_Prescription_Comments_c" (Column AF) filtered to "No Fill"
 6. 44,547 trees
 - a. "PrescripL2InspComp" (Column M) set to 'False'
 - b. "VM_Inspected_Comments_c" (Column AE) filtered to "Yellow"
 - c. "VM_Prescription_Comments_c" (Column AF) filtered to "No Fill"
 7. 2,110 trees
 - a. "PrescripL2InspComp" (Column M) set to 'False'
 - b. "VM_Inspected_Comments_c" (Column AE) filtered to "No Fill"
 - c. "VM_Prescription_Comments_c" (Column AF) filtered to "Yellow"
 8. 5,200 trees
 - a. "PrescripL2InspComp" (Column M) set to 'False'
 - b. "VM_Inspected_Comments_c" (Column AE) filtered to "Yellow"
 - c. "VM_Prescription_Comments_c" (Column AF) filtered to Yellow"
- C. Please see "*PGE_2024_WMP_VM_Audit_20251114_Response_F04_Atch03_VMDR-4304_Q4_SierraRefresh_20251022.xlsx*" in the Attachments folder for the total of L2 Inspection Complete – Total: 397,235 (The sum of bullet points 9,10, 11, and 12).
9. 293,600 trees
 - a. "PrescripL2InspComp" (Column M) set to 'True'
 - b. "VM_Inspected_Comments_c" (Column AE) filtered to "No Fill"
 - c. "VM_Prescription_Comments_c" (Column AF) filtered to "No Fill"
 10. 101,805 trees
 - a. "PrescripL2InspComp" (Column M) set to 'False'
 - b. "VM_Inspected_Comments_c" (Column AE) filtered to "Yellow"
 - c. "VM_Prescription_Comments_c" (Column AF) filtered to "No Fill"
 11. 1,345 trees
 - a. "PrescripL2InspComp" (Column M) set to 'False'
 - b. "VM_Inspected_Comments_c" (Column AE) filtered to "No Fill"
 - c. "VM_Prescription_Comments_c" (Column AF) filtered to "Yellow"

12. 485 trees

- a. “PrescripL2InspComp” (Column M) set to ‘False’
- b. “VM_Inspected_Comments_c” (Column AE) filtered to “Yellow”
- c. “VM_Prescription_Comments_c” (Column AF) filtered to Yellow”

Finding	8.2.3 Vegetation and Fuels Management
Vegetation Management Initiative	8.2.3.1 Pole Clearing (VM-02)
Finding No. 05	PG&E did not provide information consistent with the completion of work identified in initiative 8.2.3.1 Pole Clearing. Therefore, Energy Safety concludes that initiative 8.2.3.1 Pole Clearing is deficient.
Corrective Action(s)	In its CAP PG&E must provide records of pole clearing work, clarifying completion of pending or incomplete work and whenever work was not completed, PG&E must submit documentation describing the constraints which prevented this work. If PG&E did not complete its pole clearing target, it must identify the actions it plans to implement to ensure the work is completed in future performance years.

Response to Finding No. 05:

PG&E disagrees with the finding that we did not provide information consistent with the definition of completed work as of 2024. As detailed below, the reporting of work completed is consistent with the processes and internal definitions of unit completion from 2024. However, we plan to implement improvements to our internal procedures and reporting structures to better track completion of work in future reporting years.

Please see Column V in “*PGE_2024_WMP_VM_Audit_20251114_Response_F05_Atch01_v2.xlsx*” for the current status on each pole. Please see summary below for an update broken out by work status.

Completed, Pending 1254(c):

Poles with a “Completed, Pending 1254(c)” Initial Clear status were counted toward the 2024 target. This status indicates that 1254(a) and (b) work was completed at the date provided, and 1254(c) work was outstanding, as it requires different field resources to complete due to the nature of the work. We deemed these poles “complete” toward the WMP Initial Clear target definition at that point in time. All poles continued to be actively managed and statuses updated in subsequent visits, per TD-7112P-01. The attached spreadsheet shows updates since the end of 2024 to 12,378 “Completed, Pending 1254(c)” poles:

- For 11,356 poles, work was completed or we identified that no 1254(c) work was needed per the relevant procedure at the time.
- 305 poles are constrained poles; we are actively working to resolve the constraints.
- The remaining 717 unconstrained poles will be completed by the end of the 2025 project year, barring external factors.

In response to this finding, we are drafting a bulletin to TD-7112P-01 to clarify and tighten expected

timelines for completing 1254(c) work in relation to initial clear and maintenance cycles. We acknowledge that this is an area needing improvement so that these poles can be moved to “Completed” tree work status alongside the “Complete, Pending 1254(c)” status.

Completed, partial refusal:

Poles with “Completed, partial refusal” Initial Clear status were also counted toward the 2024 target. This status indicates that a substantial part of the cylinder surrounding the pole was cleared to the extent agreed upon by the customer(s) adjacent to the pole. The clearing varied by each unique customer and situation. We also deemed these poles “complete” toward the WMP Initial Clear target definition at that point in time. The attached spreadsheet shows updates since the end of 2024 to 1,214 “Completed, partial refusal” poles:

- For 680 poles, we have completed all work, not worked per procedure, or completed, pending 1254(c) with work to be completed in 2025.
- There are 38 poles within the data that are not subject pole locations or are duplicated pole locations and will be removed from the system’s inventory
- The 496 constrained or partially constrained poles continue to be reassessed during all VC Pole Clearing cycles and cleared to the extent possible. However, we acknowledge the opportunity to align this program with the standardized Vegetation Management constraints processes utilized on other Distribution Routine work. We are actively adjusting the pole clearing procedure to incorporate these constraints processes.

In response to this finding, we plan to remove this status in the near future and instead utilize other “Constrained” categories to describe the work status, in line with other VM programs.

Constrained:

Poles with a “Constrained” Initial Clear status in 2024, represent locations we were unable to work due to external factors such as safety, customer refusal, access or environmental concerns. Again, we deemed these poles “complete” toward the WMP Initial Clear target definition at that point in time. The attached spreadsheet shows updates since the end of 2024 to 3,654 “Constrained” poles:

- For 1,858 poles, we actively worked to resolve constraints and completed work, did not work per procedure, or completed, pending 1254(c) with work pending in 2025.
- There are 16 poles within the data that are not subject pole locations or are duplicated pole locations and will be removed from the system’s inventory
- The 1,780 locations that remained constrained throughout the 2024 project year were reevaluated during the 2025 inspection cycle. Like the “Completed, Partial Refusal” status, we recognize that our current process to resolve constraints can be better aligned with other Distribution Routine work, and we are working to adopt the standardized Vegetation Management constraints processes within the Pole Clearing program.

No Work:

Per procedure TD-7112P-01, locations can receive “No Work” status during the Initial Clear cycle if no work is identified. Again, poles with a “No Work” status were to be deemed “complete” toward the WMP Initial Clear target definition at that point in time. The attached spreadsheet shows 8 “No Work” poles, for which no status update is needed (because work is not needed).

NULL:

While transitioning to the One VM system in 2024, a “NULL” designation was assigned where an historical pole did not exist and therefore no work was needed. To address this, we used the One VM comment field to indicate that no work was required and the pole was either no longer in existence or no longer subject to PRC 4292 requirements. The attached spreadsheet shows updates since the end of 2024 to 18 “NULL” poles, where appropriate/necessary:

- 14 poles were removed from inventory and counted as completed units toward the 2024 WMP target.
- 1 pole was completed per the system of record.
- 3 poles were erroneously listed as “NULL” status; these are noted in the attached data. We acknowledge gaps in data reporting and recognize the need to provide additional clarification to ensure transparency and accuracy. We are actively refining our processes and maintaining reliable error tracking to ensure data management issues are addressed quickly and effectively.

Finding	8.2.3 Vegetation and Fuels Management
Vegetation Management Initiative	8.2.3.2 Wood and Slash Management
Finding No. 06	PG&E did not provide information consistent with the completion of work identified in initiative 8.2.3.2 Wood and Slash Management. Therefore, Energy Safety concludes that initiative 8.2.3.2 Wood and Slash Management is deficient.
Corrective Action(s)	In its CAP PG&E must provide records of slash (debris less than 4 inches in diameter) removal for work associated with its vegetation management programs and whenever work was not completed, PG&E must submit documentation describing the constraints which prevented this work. If PG&E does not have records of slash removal, it must identify the actions it plans to implement to ensure the work is completed in future performance years.
Statement 4	“Debris less than 4 inches in diameter that is generated during pruning activities are chipped or lopped and scattered on the property in accordance with applicable regulations. Chips are left on site or removed off site based on owner preferences.”

Response to Finding No. 06:

PG&E recognizes that this feedback from Energy Safety is ongoing. Currently, VM does not track the management of vegetative material less than 4 inches in diameter.

As previously stated in our response to comments from the 2023 Annual Report of Compliance (ARC) Report, PG&E does not currently plan to create new fields in our database to track the management of vegetative material less than 4 inches in diameter – also referred to as “debris” – or to integrate a tracking requirement into internal procedures.

However, by the end of 2025, PG&E’s VM Quality Control team plans to incorporate wood debris management verification into their quality observations.

Finding	8.2.3 Vegetation and Fuels Management
Vegetation Management Initiative	8.2.3.8 Emergency Response Vegetation Management
Finding No. 07	PG&E did not provide information consistent with the completion of work identified in initiative 8.2.3.8 Emergency Response Vegetation Management. Therefore, Energy Safety concludes that initiative 8.2.3.8 Emergency Response Vegetation Management is deficient.
Corrective Action(s)	In response to Energy Safety’s finding related to the delayed mitigation of trees with P2 conditions during RFW events, in its CAP, PG&E must describe any procedures that it implements to mitigate ignition risk associated with trees exhibiting Priority 2 conditions that are pending work during RFW events. PG&E must also identify the actions it plans to implement to ensure that trees with P2 conditions in active RFW areas are reviewed and mitigated as outlined in its VM Priority Tag Procedure.
Statement 13	“Vegetation identified as pending Priority 2 work within the RFW [Red Flag Warning] area will be reviewed and mitigated as outlined in the VM Priority Tag Procedure (TD-7102P-17).”

Response to Finding No. 07:

PG&E acknowledges this finding. VM completed 96% of Priority 2 tags within 20 business days and continues to utilize internal reporting mechanisms to manage P2 trees and their timeliness.

Please note, while PG&E does not have a process specific to review of P2s during active Red Flag Warnings (RFW) events outside of the VM Priority Tag Procedure, TD-7102P-17, Rev. 3 includes language regarding evaluation of P2s when Emergency Operation Centers are activated during potential Public Safety Power Shutoff (PSPS) events that may include RFW conditions.

PG&E has implemented the following mechanisms to support the timely completion of P2s:

- Priority Tag Analysis Power_BI dashboard which contains a P2 Tag Look ahead utilized by VM Regional Managers and Directors on their Daily Operating Reviews (DORs) for discussions with their teams.
- Emails delivered to highlight Priority tags that are coming due or are overdue. The email utilizes data derived from the same Power_BI referenced in the bullet above.
- In Weekly Operating Reviews (WOR), the VM operation teams review both P1 and P2 trees that show an untimely work date in order to determine what caused the delay in completion of the prescribed work.

Finding	8.2.3 Vegetation and Fuels Management
Vegetation Management Initiative	8.2.3.8 Emergency Response Vegetation Management

Finding No. 08	PG&E did not provide information consistent with the completion of work identified in initiative 8.2.3.8 Emergency Response Vegetation Management. Therefore, Energy Safety concludes that initiative 8.2.3.8 Emergency Response Vegetation Management is deficient.
Corrective Action(s)	Regarding hazard tree assessments and mitigation in wildfire affected areas in 2024, PG&E must include in its CAP an updated dataset identifying any trees in burned areas prescribed for mitigation in 2024 that were still pending work at the time of PG&E’s response to Data Request OEIS-E-SVM_2025-PG&E-03. For any work that remains incomplete, PG&E must outline corrective actions to resolve outstanding issues or propose alternative solutions and submit documentation describing the constraints which prevented the completion of this work.
Statement 14	“The second phase of VM activities [regarding VM work in post fire areas] are focused on reliability by mitigating hazard trees that have the potential to fail into PG&E assets. PG&E performs a hazard tree assessment of the burned area to determine whether trees pose a threat to electric assets and if they should be abated.”

Response to Finding No. 08:

PG&E acknowledges this finding. PG&E confirms completion of 97% of work identified through hazard tree inspections in burned areas. Based on recent data, VM only has 10 trees (3%) pending work due to constraints, out of 363 trees with F1 and F2 designations.

Please note that the original One VM data contained duplicate records because it was not filtered to include only the most recent prescription version (using RX_RN = 1). After removing duplicates, the final counts are: 352 trees in One VM and 11 trees in Legacy.

As of 10/27/2025, PG&E has completed mitigation work on **160** of the **363** trees with F1 and F2 designations that were pending work. An additional **193** trees have an updated prescription status of “Inspected, No Work,” indicating that no mitigation was required following inspection. The remaining **10 trees** are currently classified as “Constrained” due to agency-related limitations.

Please see the attachment *“PGE_WMP_VM_Audit_20251114_Response_F08_Atch01_CONF.xlsx”*.

- **160 mitigated trees:** Sheet “One VM_422 Trees,” filter ‘WOLISstatus’ (cell AM1) to “Completed.”
- **193 trees requiring no work:**
 - 192 from “One VM_422 Trees,” filter ‘WOLISstatus’ to “Null” and “Not Completed.”
 - 1 tree (ObjectID 14177) from “AGOL_11 Trees” was field verified on 11/5/25 and confirmed to be ‘No Work’ needed.
- **10 constrained trees:** Please see Column BE ‘Status Update’ on tab “AGOL_11 Trees”
 - Please note, field verification for the 10 trees was completed on 11/5/25 and it was determined by the inspector that 9 out of the 10 trees will be updated to ‘No Work’.
 - The remaining tree, OBJECTID 14186, was confirmed to be removed by the property owner.

As a process improvement, we are now able to input the post-wildfire prescribed trees into our One VM projects, resulting in more visibility and an improved tracking mechanism moving forward.

Previously, trees prescribed for work as a result of post-wildfire inspections were tracked outside of the One VM application.

Finding	8.2.4 Vegetation Management Enterprise System
Vegetation Management Initiative	8.2.4 Vegetation Management Enterprise System – FTI Record Keeping Enhancement (VM-21)
Finding No. 09	PG&E did not provide information consistent with the completion of work identified in initiative 8.2.4 Vegetation Management Enterprise System. Therefore, Energy Safety concludes that initiative 8.2.4 Vegetation Management Enterprise System is deficient.
Corrective Action(s)	In its CAP PG&E must provide corrective actions to ensure that it applies a standard tree risk assessment of potential strike trees inspected by the FTI program in future performance years.

Response to Finding No. 09:

PG&E acknowledges this finding. We have implemented several process improvements throughout 2024 and 2025 that are intended to improve the consistency in how TRA forms are gathered.

There were many changes and updates to the FTI process and procedure throughout 2024 that resulted in inconsistencies in ensuring Tree Risk Assessment forms were being uploaded by inspectors. Please see below for a timeline:

- FTI Procedure, TD-7102P-01-Att07 Revision 1, was published on 1/8/24 and had an effective date of 3/24/24.
 - This procedure required all vegetation (categorized as either a whole tree or portion of a tree) which has likelihood of impacting PG&E facilities be inspected with a Level 2 inspection and have a paper Tree Risk Assessment form photographed and uploaded.
- FTI Procedure, TD-7102P-01-Att07 Revision 2, was published 4/8/24 and had an effective date of 4/8/24.
 - This procedure updated the verbiage of inspections to only inspect all strike trees and only perform Level 2 inspection of all strike trees.
 - The instructions to complete and upload a paper Tree Risk Assessment form for the strike trees remained.
- On 7/24/24, an FTI Bulletin, TD-7102P-01-B041 was released to further update the process and procedures for FTI inspectors. This bulletin release occurred prior to the next scheduled revision of the procedure, which was forecasted at the time to occur in late 2024. The next revision of TD-7102P-01-Att07 would capture all the changes mentioned in the bulletin.
 - Within the bulletin, instructions were given to perform Level 2 inspection of all strike trees, however, a TRAQ form should only be submitted if the tree had the likelihood to impact PG&E facilities (excluding service drops), was probable to fall in the next 15 months, and was prescribed one of the following prescription types: Felled Tree, Targeted Prune, or Major Dismantle.

- For all other prescriptions, Aerial Pruning, Maintenance, Brush, and No Work, the inspectors were not required to submit a Tree Risk Assessment form.
- Moving into 2025, VM published TD-7102P-01-Att07 Revision 3 on 2/28/25 with an effective date of 4/28/25. This current document captures the updated instructions from the bulletin released in 2024, as well as updated language stating that a Tree Risk Assessment form must be submitted if any trees may fall in or otherwise impact PGE electric facilities.

In 2024, inspectors were required to attach a Tree Risk Assessment form to the record of trees listed for work. Please see 'PGE_2024_WMP_VM_Audit_20251114_Response_F09_Atch01_CONF.xlsx' for a sample population of the photos uploaded by inspectors for FTI in 2024. This is seen in Column K 'VersionDataUrl' which includes a URL for each photo uploaded, totaling 166,539 photos.

In 2025, an internal guidance document was released via VM Program Communications on 2/20/25 stating that the paper upload of Tree Risk Assessment forms would no longer be accepted as we had completed the digital enhancement to have the Tree Risk Assessment form available within the One VM application in 2024. However, instructions were not provided to move fully digital until February 2025. In 2024, there were 229 digital TRAQ forms completed, which can be identified by Column AB 'VM_Tree_Risk_Assessment_Form_r_Name' on the original submitted supporting documents. The move to digital completion of the Tree Risk Assessment forms removes the need for inspectors to physically fill out a paper form that they would then need to photograph and upload which results in an improvement for record keeping.

Finding	8.2.6 Open Work Orders
Vegetation Management Initiative	8.2.6 Open Work Orders
Finding No. 10	PG&E did not provide information consistent with the completion of work identified in initiative 8.2.6 Open Work Orders. Therefore, Energy Safety concludes that initiative 8.2.6 Open Work Orders is deficient.
Corrective Action(s)	In its CAP, PG&E must provide an update for any of the pending mitigation work identified by Energy Safety in Initiative 8.2.6 Open Work Orders. For work that remains incomplete, PG&E must outline corrective actions to resolve outstanding issues or propose alternative solutions, and submit documentation describing the constraints which prevented the completion of this work. PG&E must also provide corrective actions to prevent similar delays in future performance years.
Statement 18	"If an inspector determines that vegetation is an immediate risk to PG&E facilities the Priority Tag Utility Procedure is followed (TD-7102P-17). Under normal conditions, Priority 2 tags are issued for vegetation that is within MDR to the electric lines and must be mitigated within 20 business days."

Response to Finding No. 10:

PG&E acknowledges this finding. Of the 2,805 trees noted as incomplete, VM has completed or de-escalated work on 2,539 (91%) as shown in the data described below. VM continues to utilize internal reporting mechanisms to manage P2 trees and their timeliness.

Please see the attachment “*PGE_2024_WMP_VM_Audit_20241114_Response_F10_Atch01.xlsx*” for status updates on the 2,805 incomplete trees.

- Please see below for the various status explanations:
 - Work completed but timeline exceeded
 - Mitigation work completed more than 20 business days of work being prescribed
 - Work completed on time 2 (Constraint impact)
 - Mitigation work completed more than 20 business days of work being prescribed due to constraint, but mitigated within 20 business days of constraint being resolved
 - Work De-escalated
 - Work changed to no work code or de-escalated from P2 to Routine priority
 - Work Incomplete but constrained
 - Work pending due to active constraint
 - Work Incomplete but not overdue
 - Due date has not elapsed but mitigation work still pending
- 541 Trees – Work incomplete and overdue
 - Tab “2024 P2 Data_Oct” filter ‘Population’ Column to “541”
 - 26 Trees – Work completed but timeline exceeded
 - 324 Trees – Work completed on time 2 (Constraint impact)
 - 144 Trees – Work De-escalated
 - 31 Trees – Work incomplete but constrained
 - 16 Trees – Work incomplete but not overdue
- 119 Trees – Work incomplete but not overdue
 - Tab “2024 P2 Data_Oct” filter ‘Population’ Column to “119”
 - 5 Trees – Work completed but timeline exceeded
 - 100 Trees – Work completed on time 2 (Constraint impact)
 - 11 Trees – Work De-escalated
 - 3 Trees – Work incomplete but constrained
- 2,145 Trees – Work incomplete but constrained
 - Tab “2024 P2 Data_Oct” filter ‘Population’ Column to “2145”
 - 259 Trees – Work completed but timeline exceeded
 - 784 Trees – Work completed on time 2 (Constraint impact)
 - 886 Trees – Work De-escalated
 - 198 Trees – Work incomplete but constrained
 - 18 Trees – Work incomplete but not overdue

The current mechanisms in place to promote timely completion of P2s include:

- The Priority Tag Analysis Power_BI dashboard which contains a P2 Tag Look ahead utilized by

VM Regional Managers and Directors on their Daily Operating Reviews (DORs) for discussions with their teams.

- Daily emails delivered to highlight Priority tags that are coming due or are overdue. The email utilizes data derived from the same Power_BI referenced in the bullet above.
- In Weekly Operating Reviews (WOR), the VM operation teams review both P1 and P2 trees that show an untimely work date in order to determine what caused the delay in completion of the prescribed work.

Finding	8.2.6 Open Work Orders
Vegetation Management Initiative	8.2.6 Open Work Orders
Finding No. 11	PG&E did not provide information consistent with the completion of work identified in initiative 8.2.6 Open Work Orders. Therefore, Energy Safety concludes that initiative 8.2.6 Open Work Orders is deficient.
Corrective Action(s)	Specific to Energy Safety’s finding related to delayed Priority 1 work, in its CAP, PG&E must provide measures to ensure that mitigation of P1 trees is not delayed due to weekends, holidays, or other non-working periods. It must also describe any processes that PG&E utilizes to ensure consistent tracking of mitigation timeframes across all internal systems and ensure that changes to a tree work order’s priority level do not affect the accuracy of P1 tracking.
Statement 19	“All trees identified for work by pre-inspectors are prioritized. If vegetation is determined to be an immediate risk to PG&E facilities, described as a Priority 1 Condition in the VM Priority Tag Procedure (TD-7102P-17), the condition will be mitigated within 24 hours of identification as long as conditions are safe for the tree crew to proceed with work.”

Response to Finding No. 11:

PG&E disagrees with this finding. PG&E asserts 99.9% of Priority 1 (P1) prescriptions were completed timely. Upon further review of our data, PG&E believes additional explanation was warranted for 106 records previously provided. Of those 106 locations, there was only one location (Bay Region) where there was a non-safety-related delay, where PG&E misidentified and worked a nearby P2 tree instead of the subject P1 tree in error. As such, 99.9% of Priority 1 prescriptions were completed within the required timeframe according to PG&E’s procedures.

The 106 locations PG&E believes warranted additional explanation were identified by applying a filter to Column J for values greater than 2 on attachment "DRU15478_Q040_Atch01_VMDR-3714_Q40 Data.xlsx". A value of 1 represents the present day, 2 indicates the following day, and any value above 2 signifies that mitigation occurred beyond the required timeframe. The results are the records that we further researched to identify whether any locations were mitigated outside the required timeframe for addressing a Priority 1 prescription.

Regarding the suggested corrective actions:

PG&E believes that our existing procedure already accounts for work identified prior to weekends, holidays, or other non-working periods. As identified in Section 2.1.2 of Utility Procedure: TD-7102P-17, Rev. 2, an employee or contractor remains on site if there are delays due to unsafe conditions, including the need to schedule electric crews to deenergize nearby facilities for safety.

All open P1 tree work orders are displayed during the VM Operations and Leadership daily operating reviews. During these meetings, the team reviews the current completion status and projected timelines for each outstanding work order. Any exceptions to the standard mitigation timeline are promptly escalated for further action and resolution. Additionally, in the Weekly Operating Reviews for VM Operations and Leadership, the team evaluates the overall timeliness of P1 tree work mitigations, presenting performance metrics on both a week-to-date and year-to-date basis. The dashboard system utilized for these daily meetings pulls data across all relevant systems of record, ensuring consistent tracking of timeframes, regardless of the system in which we initially identified the work.

In 2026, PG&E will be implementing a collection of timestamp data that will make the tracking of the appropriate timelines more consistent within One VM when a prescribed priority status is changed from P2 to P1. This will improve the traceability and subsequent validation of the appropriate mitigation timeline. Current enhancements recently released to the One VM application for P1/P2 escalations are as follows:

- Record keeping now includes timestamps of priority level escalations
- Prior to the change, timeliness was defined as the difference between creation date and completion date. The recent release now enables us to measure timeliness as the difference between escalation date and completion date.

Finding	8.2.6 Open Work Orders
Vegetation Management Initiative	8.2.6 Open Work Orders
Finding No. 12	PG&E did not provide information consistent with the completion of work identified in initiative 8.2.6 Open Work Orders. Therefore, Energy Safety concludes that initiative 8.2.6 Open Work Orders is deficient.
Corrective Action(s)	In its CAP, PG&E must provide an update for any of the pending mitigation work identified by Energy Safety in Initiative 8.2.6 Open Work Orders. For work that remains incomplete, PG&E must outline corrective actions to resolve outstanding issues or propose alternative solutions, and submit documentation describing the constraints which prevented the completion of this work. PG&E must also provide corrective actions to prevent similar delays in future performance years.
Statement 20	“PG&E has implemented a plan to complete the identified dead/dying tree work [from PG&E’s Second Patrol Program] within 180 days for HFTD areas and within 365 days for non-HFTD areas.”

Response to Finding No. 12:

PG&E acknowledges the finding. PG&E confirms that 14,875 units (84%) have been completed out of the 17,786 trees in the data referenced where work was overdue and still pending as of May 5, 2025 and still pending but not yet overdue. Plans are under development to address the remaining 2,911 (16%) trees that have not been worked.

As noted in the WMP, completion of identified work can be subject to External Factors, which represent reasonable circumstances that may impact execution against targets including, but not limited to, physical conditions, landholder refusals, environmental delays, customer refusals or non-contacts, permitting delays/restrictions, weather conditions, removed or destroyed assets, active wildfire, exceptions or exemptions to regulatory/statutory requirements, and other safety considerations.

Please see **“PGE_2024_WMP_VM_Audit_20251114_Response_F12_Atch01.xlsx”** for updates on the 17,786 dead or dying trees that were overdue or pending work.

14,867 Trees within HFTD areas

- Tab “Tree Mortality Refresh” filter “HFTD” (Column AR) to ‘HFTD’ and filter “Completion status – field” (Column AD2):
 - 8,697 Trees – “Complete”
 - 3,593 Trees – “Constraint”
 - 512 Trees – “Generated – Not worked”
 - 474 Trees – “Not generated”
 - Within time period – not worked
 - 1,591 Trees – “Blank”
 - No Work Required
 - Tab “Tree Mortality Refresh” filter “HFTD” (Column AR) to ‘HFTD’, filter “Completion status – field” (Column AD2) to ‘Constraint’ and filter “ITS Type” (Column AG2): *Worksheet details the status of the 3,593 constraints*
 - 2 Trees – “Access”
 - 1,569 Trees – “Agency Managed Lands”
 - 14 Trees – “CA – Environmental Constraint-Delay”
 - 2 Trees – “CA – Government Constraint-Delay”
 - 251 Trees – ‘CAL TRANS’
 - 31 Trees – “Clearance Request”
 - 10 Trees - “Contact”
 - 36 Trees – “Customer Contact”
 - 21 Trees – “Customer Interference”
 - 39 Trees – “Encroachment Permitting”
 - 32 Trees – “Environmental Review”
 - 11 Trees – “Nest”
 - 16 Trees – “No Work Review Required”
 - 31 Trees – “Operational”
 - 2 Trees – “Quarantine”
 - 14 Trees – ‘Refusals’

- 62 Trees – “Riparian”
- 424 Trees – “Veg Point Refusals”
- 1,026 Trees – “Blank”

2,919 Trees in the non-HFTD areas

- Tab “Tree Mortality Refresh” filter “HFTD” (Column AR) to ‘Non-HFTD’ and filter “Completion status – field” (Column AD2):
 - 2,103 Trees – “Complete”
 - 482 Trees – “Constraint”
 - 109 Trees – “Generated – Not worked”
 - 75 Trees – “Not generated”
 - Within time period – not worked
 - 150 Trees – “Blank”
 - No Work Required
 - Tab “Tree Mortality Refresh” filter “HFTD” (Column AR) to ‘Non-HFTD’, filter “Completion status – field” (Column AD2) to ‘Constraint’ and filter “ITS Type” (Column AG2): *Worksheet details the status of the 3,593 constraints*
 - 1 Trees – “Access”
 - 265 Trees – “Agency Managed Lands”
 - 2 Trees – “CA – Government Constraint-Delay”
 - 24 Trees – “CAL TRANS”
 - 7 Trees – “Clearance Request”
 - 2 Trees – “Contact”
 - 1 Trees – “Customer Contact”
 - 12 Trees – “Customer Interference”
 - 21 Trees – “Encroachment Permitting”
 - 2 Trees – “Environmental Review”
 - 9 Trees – “Nest”
 - 4 Trees – “No Work Review Required”
 - 10 Trees – “Operational”
 - 7 Trees – “Refusals”
 - 68 Trees – “Riparian”
 - 38 Trees – “Veg Point Refusals”
 - 9 Trees – “Blank”

To ensure visibility and tracking towards these timelines, a metric for dead and dying trees was incorporated into Vegetation Management’s Daily Operating Review (DOR) meetings. These DORs occur at senior leadership levels to maintain visibility of priorities and align on daily outcomes.

Finding	8.2.6 Open Work Orders
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Vegetation Management Initiative	8.2.6 Open Work Orders
Finding No. 13	PG&E did not provide information consistent with the completion of work identified in initiative 8.2.6 Open Work Orders. Therefore, Energy Safety concludes that initiative 8.2.6 Open Work Orders is deficient.
Corrective Action(s)	In its CAP, PG&E must provide an update for any of the pending mitigation work identified by Energy Safety in Initiative 8.2.6 Open Work Orders. For work that remains incomplete, PG&E must outline corrective actions to resolve outstanding issues or propose alternative solutions, and submit documentation describing the constraints which prevented the completion of this work. PG&E must also provide corrective actions to prevent similar delays in future performance years.
Statement 21	"PG&E's updated Distribution Vegetation Management Program Standard (TD-7102S 4/20/23) includes a requirement that tree work must be completed within one year (barring external factors) of being listed for work beginning in 2024."

Response to Finding No. 13:

PG&E acknowledges the finding. PG&E confirms 99.2% of the tree work was completed within one year. Regarding the 6,694 trees that were not completed within a year and were still pending at the time of data share, 5,083 trees have either since been completed or remain constrained (76%), while 1,611 trees are outstanding (24%).

Please note that completion of identified work can be subject to External Factors, which represent reasonable circumstances that may impact execution against targets including, but not limited to, physical conditions, landholder refusals, environmental delays, customer refusals or non-contacts, permitting delays/restrictions, weather conditions, removed or destroyed assets, active wildfire, exceptions or exemptions to regulatory/statutory requirements, and other safety considerations.

Please see attachment "*PGE_2024_WMP_VM_Audit_20251114_Response_F13_Atch01.xlsx*".

As of October 23, 2025, PG&E has completed mitigation work on 3,626 of the 6,694 trees that were prescribed and remain pending for over one year. The remaining 3,053 trees currently have a Work Order Line Item (WOLI) status of "Pending," "Null," or "Not Completed" as seen in Column F.

Program	Approved	Pending/NULL/Not Completed	Completed	Energy Safety's Referenced Total
Distribution Routine Patrol	15	2,371	2,890	5,276
Distribution Second Patrol	0	327	308	635
FTI	0	234	365	599
VMOM	0	121	63	184
Total	15	3,053	3,626	6,694

Of the 3,053 overdue trees with a status of "Pending," "Null," or "Not Completed," the breakdown by program and prescription status as seen in Column E is as follows:

- **99 trees** are marked as “Approved,” indicating they are eligible for work following the resolution of prior constraints.
- **85 trees** previously impacted by constraints have since been marked as “Completed.”
- **1,372 trees** remain in a “Constrained” status.
- **1,095 trees** were “Inspected, No Work,” meaning no mitigation was deemed necessary after inspection.
- **350 trees** are classified as “Inspected, Prescribed,” and are ready for work following constraint resolution.
- **13 trees** are labeled “Rejected,” signifying that crews were unable to locate the trees for mitigation.
- **39 trees** are currently “Scheduled” for work, with constraints having been resolved.

This spreadsheet includes only prescriptions associated with active constraint cases. For prescriptions with multiple active cases, all corresponding constraint types are listed in Column L. If Column L is blank, it may indicate that the prescription previously had a constraint case that is now resolved or closed, meaning the work should be assigned to tree crews.

Program	Approved	Completed	Constrained	Inspected, No Work	Inspected, Prescribed	Rejected	Scheduled	Total
Distribution Routine Patrol	79	85	1050	825	314	3	15	2,371
Distribution Second Patrol	8	0	160	106	34	10	9	327
FTI	8	0	75	145	0	0	6	234
VMOM	4	0	87	19	2	0	9	121
Total	99	85	1,372	1,095	350	13	39	3,053

To ensure visibility and tracking towards the one-year timeline, a metric for aging units was incorporated into Vegetation Management’s Daily Operating Review (DOR) meetings. These DORs occur at senior leadership levels to maintain visibility of priorities and align on daily outcomes.

Finding	8.2.6 Open Work Orders
Vegetation Management Initiative	8.2.6 Open Work Orders
Finding No. 14	PG&E did not provide information consistent with the completion of work identified in initiative 8.2.6 Open Work Orders. Therefore, Energy Safety concludes that initiative 8.2.6 Open Work Orders is deficient.
Corrective Action(s)	In its CAP, PG&E must provide an update for any of the pending mitigation work identified by Energy Safety in Initiative 8.2.6 Open Work Orders. For work that remains incomplete, PG&E must outline corrective actions to resolve

	outstanding issues or propose alternative solutions and submit documentation describing the constraints which prevented the completion of this work. PG&E must also provide corrective actions to prevent similar delays in future performance years.
Statement 22	“Routine NERC inspections are prioritized each year so that 100 percent of tree work can be completed by December 31.”

Response to Finding No. 14:

PG&E disagrees with this finding. All required Routine NERC work was completed by December 31, 2024.

Please see attachment *“PGE_2024_WMP_VM_Audit_20251114_Response_F14_Atch01.xlsx”* and below for additional information.

Of the 55 trees marked as completed in 2025:

- 53 were determined to be incorrectly identified as NERC trees due to duplicated External Tree IDs, which resulted in the incorrect tagging of Transmission Line and Voltage. Please see Column AC ‘Notes’ on the ‘Updated 55 Trees (2025)’ tab.
- 2 trees (W121502552N39519431 and W120596892N38416792) were worked on Routine in 2024. The updated work dates are provided in Column AB ‘Status’ in the spreadsheet referenced above. These trees were duplicated and worked again in 2025 on Second Patrol.

Of the 115 trees that had N/A listed for the tree work date:

- 68 of the trees are inventoried, meaning they would not require work. Please see Column X ‘Notification’ on the ‘115 Trees (No Work Date)’ tab.
- 38 Trees are quarantined and are in the ‘No Work Review’ category, which is a requirement for Shasta County.
- 3 Units have a “refusal” notification but are also in the ‘No Work Review’ required category for Shasta County and would not be considered planned work.
- 6 Trees were originally tagged with a “contact first” designation but have since been worked. Please see updated work date of 6/21/24 in Column AA ‘Tree Work Date.’

Finding	8.2.7 Workforce Planning
Vegetation Management Initiative	8.2.7 Workforce Planning
Finding No. 15	PG&E did not provide information consistent with the completion of work identified in initiative 8.2.7 Workforce Planning. Therefore, Energy Safety concludes that initiative 8.2.7 Workforce Planning is deficient.
Corrective Action(s)	In its CAP, PG&E must provide corrective measures that prevent VMIs from gaining access to One VM production and beginning work in the field prior to completing all training requirements. PG&E must also provide updated records for the two VMI working under PG&E’s FTI program in 2024 with incomplete

	or conflicting TRAQ certification records.
Statement 24	"PG&E uses the completion of VMI Basics training to ensure minimum qualifications are met before contractors can perform work in the field."

Response to Finding No. 15:

PG&E acknowledges this finding. PG&E confirms that 99% of the VMIs completed the One VM training prior to receiving production access. Regarding the 9 VMIs that were granted One VM production access prior to meeting minimum qualifications, 8 have completed the training and 1 is no longer supporting the program. Finally, we have completed all corrective actions to ensure the individuals who are still employed with the company are up to date with their required trainings.

The One VM Information Hub on the VM SharePoint site outlines the steps for accessing both the sandbox training environment and the One VM Production system. The One VM Hub further clarifies what courses must be completed by job role. The One VM Production Access User Request Form also reminds users that training must be completed before access is provided.

In our 2026-2028 WMP Revision Notice submission for ‘RN-PG&E-26-08’ under the VM-24 (Workforce Planning VM) target, we include our plans to ‘Complete Annual Audits of Completion of One VM Training and Basic Curriculum courses for VMI Personnel’ beginning in 2026.

Finding	8.2.7 Workforce Planning
Vegetation Management Initiative	8.2.7 Workforce Planning
Finding No. 16	PG&E did not provide information consistent with the completion of work identified in initiative 8.2.7 Workforce Planning. Therefore, Energy Safety concludes that initiative 8.2.7 Workforce Planning is deficient.
Corrective Action(s)	In its CAP, PG&E must provide corrective measures that prevent VMIs from gaining access to One VM production and beginning work in the field prior to completing all training requirements. PG&E must also provide updated records for the two VMI working under PG&E’s FTI program in 2024 with incomplete or conflicting TRAQ certification records.
Statement 27	“We are increasing the number of TRAQ inspectors, and our current plan is that FTI Inspections will be performed by 100 percent TRAQ certified arborists.”

Response to Finding No. 16:

PG&E disagrees with this finding. Both of the individuals that appeared to have incomplete ISA Arborist TRAQ certification records have been confirmed to be demo profiles, created for system testing purposes. PG&E asserts that 100 percent of FTI inspections were performed by TRAQ certified arborists.

Regarding the two individuals identified by Energy Safety, [REDACTED], and [REDACTED], VM Training discovered that the individuals were training demo profiles created within the ITS (Industrial

Training Solutions) system in order to test the certification record keeping process on the system. PG&E uses this system to track credentials and qualifications for employees. Please see *'PGE_2024_WMP_VM_Audit_20251114_Response_F16_Atch01_CONF.pdf'* and *'PGE_2024_WMP_VM_Audit_20251114_Response_F16_Atch02_CONF.pdf'* for their ITS profile screenshots showing their emails as 'noreply@its-training.com'.

A further review of our One VM system for the two 'inspectors' who performed FTI inspections with incomplete TRAQ records yielded no results, meaning that the profiles were not utilized for inspecting or prescribing any work.

PG&E would like to also acknowledge that two more individuals, '██████████' and '██████████', were identified as demo profiles created for testing purposes. Please see *'PGE_2024_WMP_VM_Audit_20251114_Response_F16_Atch03_CONF.pdf'* and *'PGE_2024_WMP_VM_Audit_20251114_Response_F16_Atch04_CONF.pdf'*.

Please note, VM Training has worked with ITS to establish the following expiring/expired notifications for PG&E Vegetation Management Inspector users within the ITS system:

1. A user will receive an email notification from the system that their credentials/qualifications are going to expire 90, 60, and 30 days before the expiration date.
2. Once their credentials/qualifications expire, the user will receive a daily email from the system letting them know their credentials/qualifications are expired until they requalify.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
A California Natural Resources Agency
www.energysafety.ca.gov

715 P Street, 15th Floor
Sacramento, CA 95814
916.902.6000

