PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023
Data Response

PG&E Data Request No.:	OEIS_002-Q002		
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Date Sent:	April 18, 2023	Requesting Party:	Office of Energy Infrastructure Safety
DRU Index #:		Requester:	Colin Lang

SUBJECT: REGARDING FOCUSED TREE INSPECTIONS

QUESTION 002

a. What are the minimum qualifications for an inspector preforming the tree-risk assessment for the Focused Tree Inspections?

b. Why and how did PG&E choose to use the American National Standards Institute (ANSI) A-300 tree risk assessment standard over PG&E's Tree Assessment Tool (TAT) for Focused Tree Inspections? Include a comparison of the benefits and drawbacks of ANSI A-300 and PG&E's TAT.

ANSWER 002

a) The minimum qualifications for an inspector performing the tree-risk assessment for the Focused Tree Inspection is a Tree Risk Assessment Qualification (TRAQ) through the International Society of Arboriculture (ISA).

b) We will utilize the International Society of Arboriculture (ISA) Basic Tree Risk Assessment Form for the Focused Tree Inspections. The Basic Tree Risk Assessment Form is provided with the ISA Tree Risk Assessment Manual, which is based on ANSI A-300. We utilized industry standards, regulatory guidance, and existing commitments in the decision to select ANSI A-300 as a beneficial framework as guidance for the FTI program.

- ANSI A-300 is an industry wide standard that was created independent of PG&E with decades of proven usage in the field and research employed.

- A300 is called out for use and guidance in California Power Line Fire Prevention Field Guide (2021 EDITION).

- Recommended Changes to the CPUC's General Orders on Page#11 of Envista Forensic, Inc dated July 6, 2022.

  - "Modification of GO 95, Rule 35 to emphasize safety, reliability and hazard tree assessment that would direct and enable electric utilities to better focus on the root cause of tree-related fires by requiring utilities to use the following standards and best management practices:

- ANSI-A300 (Part 9) Tree Risk Assessment a. Tree Failure American National Standards for Tree Care Operations– Tree, Shrub, and other Woody Plant Management–Standard Practices (Tree Risk Assessment a. Tree Failure) Latest Edition

- International Society of Arboriculture's Best Management Practices Utility Tree Risk Assessment Practices Edition 2020"

The ISA Tree Risk Assessment Qualification provides an industry accepted tree risk assessment methodology that benefits by being supported by a qualification program designed to train and assess candidates in a specialized field of arboriculture. The TRAQ also has pre-requisites for candidates to be eligible to apply for the TRAQ course. The TAT was built specifically for the EVM program at PG&E and was not consistent with industry standards. The TAT also did not have the same level of pre-requisites or level of training and assessment as does the TRAQ.