FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

JUNE 30, 2023

Pacific Gas and Electric Company®

C2 GROUP®

BUREAU VERITAS

Table of Contents

DISCLAIMER

This report has been compiled through the process of observation and review of documents provided by the electric service provider named herein. The Office of Energy Infrastructure Safety ("OEIS") instituted the requirement for an independent evaluation of electric utility providers Wildfire Mitigation Plans ("WMP"). Bureau Veritas is not the designer, implementer, or owner of the WMP and is not responsible for its content, implementation and/or any liabilities, obligations or responsibilities arising therein.

The report reflects only those conditions and practices which could be ascertained through observation at the time of evaluation. This report is limited to those items specifically identified herein. The report is not intended to validate the dangers, hazards and/or exposures are or are not present. Bureau Veritas shall only be responsible for the performance of the services identified or defined in its specific scope of services.

Bureau Veritas does not assume any responsibility for inaccurate, erroneous or false information, express or implied, that was provided to Bureau Veritas for its evaluation herein. In addition, Bureau Veritas shall have no responsibility to any third party relying on this report. This report is for the sole benefit of OEIS and the electric Service Provider herein.

1. EXECUTIVE SUMMARY

Background

Derived from the devastating wildfires of 2016 and 2017, California Public Utilities Commission (CPUC) opened Rulemaking 18-10-007 to provide guidance on the Investor-Owned Utilities (IOU) Wildfire Mitigation Plans (WMPs). Moving forward, California Legislature passed several bills increasing the oversight for the investor-owned utilities (IOUs) as it related to mitigating wildfires associated with electrical corporation's infrastructure role in utility-related wildfires. This resulted in key legislative measures, Senate Bill 901 (2018), Assembly Bill 1054 (2019), and Assembly Bill 111 (2019). Since the passing and ratification of this legislation, the Wildfire Safety Division (WSD) of the California Public Utilities Commission (CPUC) transitioned to the Office of Energy Infrastructure Safety (OEIS)/ Energy Safety at the California Natural Resources Agency (CNRA) on July 1, 2021. The wildfire mitigation process requires utilities to submit their annual Wildfire Mitigation Plan (WMP) in a 3-year cycle. The initial WMP is submitted in the first year (2020) and follows with annual updates occurring for years 2 (2021) and 3 (2022).

Pursuant to P.U. Code Section 8386.3(c)(2)(B)(i), (ii), (iii), and (iv), Bureau Veritas North America, Inc. (BVNA) has been selected as an Independent Evaluator (I.E.) to review and assess Pacific Gas and Electric (PG&E) 2022 Wildfire Mitigation Plan (WMP) and provide a report each year. In carrying out the stipulations of Resolution WSD-021, BVNA has evaluated PG&E's compliance with its 2022 WMP pursuant to Public Utilities Code Section 8386, validated PG&E's quality assurance and quality control (QA/QC) programs outlined for support of 2022 WMP initiatives and reviewed its 2022 WMP funding activities.

Scope

Pursuant to the Energy Safety's Revision Notice for Pacific Gas and Electric company's 2022 WMP Update and the requirements of the Public Utilities Code (PU Code); Bureau Veritas North America, Inc. (BVNA), in partnership with C2 Group, have reviewed PG&E's 2022 WMP issued on July 26, 2022, known as "2022 Wildfire Mitigation Plan – Revised", for initiative compliance verification for the execution of the 2022 WMP goals and targets. As a tool for understanding the extent of the 2022 wildfire mitigation goals and activities, the following figure is provided from PG&E's 2022 Wildfire Mitigation Plan – Revised, dated July 26, 2022:

Figure 1: PG&E-ES-4 PG&E 2022 WMP Goals

The IE evaluation has provided the following narrative and supplemental documents (See Appendices) for verification of compliance, validation of Quality Assurance (QA)/Quality Control (QC) programs, and assessment of the utility funding activities related to the 2022 WMP.

Key Findings

Corrective actions to be taken in the Large Volume QA/QC process include section 7.3.4 in which inadequacies are noticed amongst documentation inconsistency between photographic documentation and written inspection reports, making it a challenge to determine an actual condition, such as bar code and pole numbers compared to the photos. Aerial inconsistency evaluations with the scoring in terms of damage to the asset was 8.8% of Tier 2 and 11.2% of Tier 3 inspections reported moderate damage. But in an overall condition of that specific asset it was scored as "no visual damage". 5.6% of Tier 2 and 4.8% of Tier 3 inspections reported heavy damage within an asset, but overall the condition was recorded as "no visual damage".

In the Small Volume Quantifiable Goal/Target category, most of the initiatives showed as completed, which was demonstrated by documents provided in data request responses. Areas of improvements include section 7.3.3.8.3, Distribution Line Motorized Switch Operator Replacement, 7.3.3.9.1, SCADA Recloser Equipment Installations, and 7.3.3.9.2 Fuel Savers (Single Phase Reclosers) Installations.

The Large Volume Quantifiable Goal/Target – Field Verifiable Goals and Target Quantities were met and, in most cases, exceeded, based on in-field assessments, the information provided in data requests, and desktop reviews. The IE determined that PG&E had effectively achieved its Section 3.1.2 Large Volume Quantifiable Goals and target initiatives, which are described in the 2022 WMP. Some of the IE's findings in Section 3.1.2 are included as follows:

- **7.3.3.17.1 - C.11 - System Hardening – Distribution**
  PG&E committed to system hardening 470 highest-risk miles in 2022, which it exceeded by 13 miles; a total system hardening of 483 miles was reported. The IE field verified a sample representing 51.26 miles of system hardening and reviewed additional documentation and satellite imagery. The data suggest that PG&E met and exceeded their distribution system hardening commitment. No issues were identified, and the work quality is satisfactory based on the assessment of the distribution system hardening.

- **7.3.5.2 - E.01 - Enhanced Vegetation Management**
  PG&E committed to 1,800 circuit miles for EVM in 2022, which it exceeded by 123.8 circuit miles; a total of 2047.6 circuit miles was reported. Additionally, according to PG&E's reporting, 98.7% of the EVM work focused on the top 20% of the miles with the highest risk rankings. The IE team verified 177 circuit miles, encompassing over 33,000 trees across 43 circuits. To further verify patterns and trends associated with the tree removal work, the IE team validated an office-based sample of an additional 20 circuit miles, utilizing high-resolution satellite imagery. However, in the IE field teams' inspection of the work areas associated with the initiative, a discrepancy was observed at 15 segment locations. These sites, representing work classifications of 248 tree removals, 22 tree trims, and 16 instances of overhang work, had various residual debris surrounding the remediated trees.

- **7.3.4.17 - D.10 - HFTD/HFRA Open Tag Reduction – Distribution**
  PG&E's target of closing 55,000 E maintenance tags by the end of 2022, although PG&E did not meet their goal of 55,000 E tags, they did prioritize and complete 45,951 tags, including higher priority A, B, and F tags, bringing the total to 58,275 tags completed. Based on the IE review and acknowledging that PG&E states they did not meet their goal/target, the IE evaluates this initiative as not compliant with the 2022 WMP.

- **7.3.5.13 - E.05 - Vegetation Management - Quality Assurance and Quality Verification**
  PG&E identified targets for vegetation management quality assurance and quality verification activities for seven (7) areas, listed as follows, with two (2) components for each activity; audits and Acceptable Quality Level (AQL) of 95%: Quality Assurance Audits Distribution, Quality Assurance Audit Vegetation Pole Clearing, Quality Assurance Audit Transmission, Quality Assurance Procedure Audits, Quality Verification Reviews Distribution, Quality Verification Reviews Vegetation Pole Clearing, Quality Verification Reviews Transmission. The IE has confirmed that PG&E has completed the activities for the seven (7) areas of Quality Assurance Vegetation Management (QAVM) and Quality Verification Vegetation Management (QVVM)

- **7.3.3.7 Expulsion fuse replacement** & **7.3.3.3 Covered conductor installation** PG&E's underspend on the following two initiatives is due to favorable unit cost performance: **7.3.3.7 Expulsion fuse replacement,** where PG&E did not spend $11.94M of the planned $35M, 34% of the total Capital amount initially allocated for this initiative, and **7.3.3.3 Covered conductor installation,** where PG&E did not spend $80.46M of the planned $366M, 22% of the total Capital amount initially allocated for this initiative. For both initiatives, no Expense amount was planned or spent.

- **7.3.4.8 LiDAR Inspections of Transmission Electric Lines and Equipment**, PG&E did not spend $1.29M of the planned $5.03M, 26% of the total Expense amount initially allocated for this initiative, and PG&E did not spend $6.28M of the planned $11M, 57% of the total Capital amount initially allocated for this initiative. The non-HFTD scope of work was removed from this initiative, and only $4.25M was spent. The remaining $6.751M of the budget was spent in 2022 on the prioritized HFTD LiDAR modeling work for electrical clearance evaluation and will continue into 2023 as described in 2023 WMP Section 8.1.3.1.8. The IE acknowledges that there were no quantitative or qualitative targets set for this work in the 2022 WMP.

2. INTRODUCTION

In an ongoing process, Energy Safety receives and incorporates guidance from the Wildfire Safety Advisory Board (Board), which reviews the Investor-Owned Utility Wildfire Mitigation Plans (WMP) and provides recommendations to Energy Safety. The Board also provides recommendations to Energy Safety on the WMP Guidelines, Performance Metrics, and Safety Culture Assessment to be addressed in the three (3) year cycle of WMPs. BVNA, in partnership with C2 Group, was issued a contract by PG&E on March 29, 2023 to provide the following IE Annual Review of Compliance report describing the technical review and findings.

PG&E Corporation, incorporated in 1905, is an energy-based holding company whose primary operating subsidiary is Pacific Gas and Electric Company, an investor-owned public utility with corporate offices in San Francisco, California. PG&E's service area covers approximately 70,000 square miles of geography in Northern and Central California, with a large geographical coverage area from Eureka in the north to Bakersfield in the south and from the Pacific Ocean in the west to the Sierra Nevada in the east.

Figure 2: Map of PG&E's Service Territory

PG&E's electrical network is comprised of approximately 7,684 MW of owned hydroelectric, nuclear, natural gas, solar, and fuel cell generation. PG&E services areas include a variety of topographies, including rural, semi-rural, residential, and high-density residential in private and federal open lands.

Pacific Gas and Electric Company (PG&E) provides natural gas and electric service to approximately 16 million people throughout a 70,000-square-mile service area in northern and central California. PG&E infrastructure includes approximately 106,681 circuit miles of electric distribution lines and 18,466 circuit miles of interconnected transmission lines, 42,141 miles of natural gas distribution pipelines, 6,438 miles of transmission pipelines, and 5.5 million electric customer accounts and growing. Over half of PG&E's service territory, approximately 5,500-line miles of electric transmission and 25,500-line miles of distribution assets, lie within these High Fire Threat Districts (HFTD) as identified by the California Public Utilities Commission (CPUC) in 2018.

3. INDEPENDENT EVALUATOR REVIEW OF COMPLIANCE

For the evaluation of PG&E's compliance with the 2022 WMP, the overall approach to verify compliance included the review and assessment of the multiple WMP activities through data requests, Subject Matter Expert (SME) interviews, review of publicly available documents, and conducting field assessments within PG&E's service area to documented and validated aspects detailed and outlined in PG&E's 2022 WMP. At the time of commencement of the evaluation, the IE initiated a review of PG&E's 2022 WMP along with publicly available documents as listed in the Appendices to identify PG&E's statements detailed within the 2022 WMP goals. PG&E's Plan elements and their fulfillment of commitments, initiatives, and metrics are included in the QA/QC provisions outlined within the 2022 WMP. BVNA's understanding of collected utility strategies demonstrated throughout the state are summarized below:

1. **Inspection and maintenance of distribution, transmission and substation assets,** including conducting system patrols and ground inspections using technological inspection tools, managing predictive and electrical preventative maintenance, conducting vegetation inspections and management, vulnerability detection such as Light Detection and Ranging (LiDAR) inspection, and geospatial and topography identification and geographic information system(GIS) mapping data. A key component is identifying collected data elements through each program and understanding how that data is used and shared to improve utility practices.

2. **Vegetation management,** including routine preventative vegetation maintenance; corrective vegetative management and off-cycle tree work; emergency vegetation clearance, prioritized for portions of the service territory in Tier 2 and 3 HFTD; quality control processes; and resource protection plan, including animal and avian mitigation programs. In addition, the goal of Enhanced Vegetation Management (EVM) aims to keep all aspects of trees away from power lines and to prescribe minimum clearances that exceed state standards. In addition, EVM implements frequencies of inspection beyond the routine patrols to address dead, diseased or dying trees from power lines where they can do no harm.

3. **System hardening** includes pole replacement, non-expulsion equipment, advanced fuses, tree attachment removal, less flammable transformer oil, covered wire and wire wrap, and undergrounding where cost beneficial.

4. **Operational practices,** including communications and executing plans under varying degrees of wildfire risk. Plans to deactivate automatic reclosers, de-energization of “at risk” area power lines based on the type of facility (overhead bare conductions, high voltage, etc.), tree and vegetation density, available dry fuel, and other factors that make specific locations vulnerable to wildfire risk.

5. **Situational awareness** includes obtaining information from devices and sensors on the actual system, weather, and other wildfire conductivity conditions and two-way communication with agencies and key personnel. Programs such as online feeds and websites such as the National Fire Danger Rating System are utilized. Situational awareness should help achieve a shared understanding of actual conditions and serve to improve collaborative planning and decision-making.

6. **De-Energization actions** triggered and prioritized by forecasted extreme fire weather conditions: imminent extreme fire weather conditions; validated extreme fire weather conditions; and plans for re-energization when weather subsides to safe levels. Manual or automatic capabilities exist for implementation.

7. **Advanced Technologies** include Distribution Fault Anticipation technology, tree growth regulators, pulse control fault interrupters, oblique and hyperspectral imagery, advanced transformer fluids, advanced LiDAR, and advanced Supervisory Control and Data Acquisition (SCADA) to reduce electrical ignition while also helping to mitigate power outages and equipment damage.

8. **Emergency Preparedness, Outreach, and Response communications** before, during, and after emergencies, including but not limited to engaging with key stakeholders that include critical facilities and served customers, local governments, critical agencies such as the California Department of Forestry and Fire Protection (CAL FIRE), local law enforcement agencies and other first responders, hospitals, local emergency planning committees, other utility providers, California Independent System Operator. Coordination agreements such as Mutual Aid or Assistance should be leveraged. A community outreach plan should inform and engage first responders, local leaders, land managers, business owners, and others.

For those activities described in the 2022 WMP but not available within the publicly available records, BVNA's team of IE's submitted data requests and conducted SME interviews to verify activities stated within the 2022 WMP (See Appendix C for Data Requests Submitted and Responses). Along with the document analysis, data requests, and SME interviews, the IE conducted field assessments within HFTD Tier 2 and Tier 3 areas to collect images and evaluate compliance with the 2022 WMP activities or initiatives identified during the IE initial review. This also included an assessment of those items supporting the mission of fire mitigation, such as the camera's use of smart meters for line fault identification. The analysis and key findings for each respective section are detailed further within the following sections.

3.1 WMP Activity Completion

WMP activities outlined in PG&E's 2022 WMP are demonstrated in tables "PG&E-5.3-1(A) List and Description of Quantitative Program Targets, Last Five Years" and "PG&E-5.3-1(B) List and Description of Qualitative Program Targets, Last Five Years." Appendix A provides a detail of the initial activities and their grouping as it pertains to Initial IE Categorization. As described above, the WMP activity includes initiatives aligned with compliance metrics developed by Energy Safety. Given the extensive nature of PG&E's asset inventory, the IE assessment of activity completion is itemized in this report's following sections. The details in Section 3.1.1, and in conjunction with Appendix A, provide a comprehensive overview of the specific verifications conducted by the IE.

3.1.1 Sampling Methodology and Discussion

In total, the IE assessed the following IE Categorizations with the associated Initiative Category/Program Target. 2022 WMP Initiative Categorization & IE Verifications required are:

Category 1 - 3.1.2 Large Volume (>/= 100 units) Quantifiable Goal/Target – Field Verifiable, specific verification performed by IE are installation and work quality (adherence to applicable standards and protocols):

- Grid Design & System Hardening
- Situational Awareness & Forecasting
- Vegetation Management & Inspections

Category 2 - 3.1.3 Large Volume (>/= 100 units) Quantifiable Goal/Target – Not Field Verifiable, specific verification performed by IE are work completion and performance.

- Asset Management & Inspections
- Grid Design & System Hardening
- Vegetation Management & Inspections

Category 3 - 3.1.4 Small Volume (less than 100 units) Quantifiable Goal/Target, specific verifications performed by IE are the installation or work completion or performance, along with work quality.

- Asset Management and Inspections
- Grid Design and System Hardening
- Grid Operations and Protocols
- Situational Awareness and Forecasting
- Stakeholder Cooperation & Community Engagement

- Vegetation Management and Inspections

Category 4 - 3.1.5 Qualitative Goal/Target, specific verifications performed by IE are work completion and performance.

- Asset Management and Inspections
- Data Governance
- Grid Operations and Protocols
- Resource Allocation Methodology
- Risk Assessment and Mapping
- Situational Awareness and Forecasting

As demonstrated above, each IE Category has aspects of each defined Initiative Category/Program Target specific to the Initiative Activity and Utility Initiative Name. This depiction illustrates how the electrical corporations categorized the list of all 2022 WMP initiatives and accompanying goals and targets as scoped for IE review. From the list, the IE based its sample size and verification method upon the initiative scope, requested additional documentation, conducted SME interviews, and selected samples to be field verified.

Large Volume Quantifiable Goal/Target - Field Verifiable.

The IE applied sampling methodologies and standards to program targets to ensure the sampling quantities were statistically acceptable. The sample sizes were determined using Mil-Std-105-E, an attribute sampling plan adopted in 1995 by the American National Standards Institute (ANSI) / American Society for Quality (ASQ) Z1.4-2008. When PG&E's actual quantity of completed work exceeded the amount targeted, the greater and 'actual' number was used when determining the field review sample quantities. According to the standard, general inspection level two should be used and was applied as the default inspection level unless otherwise specified. When the number of items to be examined (target) was ten or less, or when the item could be further evaluated using its IP address output and GPS location, 100% sampling was used.

See Table 1: Program Sampling Methodology Summary for Large Volume Quantifiable Goal/Target Field Verifiable that summarizes the individual program targets, actuals, sampling methodologies/standards, and the IE sample size/target.

The IE conducted field inspections assessing compliance for work completion, work quality, and adherence to applicable protocols and procedures. The IE field sample targets are minimums, and larger sample numbers were obtained when possible. In addition, the IE has made data requests on these program targets to review, where applicable, standards, as-builts, and relevant QA/QC program documentation. IP addresses were requested for items such as Weather Stations – Installations and Optimizations and High-Definition Cameras - Installations to assess each item's

operability. This multi-faceted approach supports verification results extrapolated across sample populations.

The IE assessed the following 11 items provided as part of PG&E's 2022 WMP's list of initiatives under section **3.1.2 Large Volume Quantifiable Goal/Target - Field Verifiable**.

Table 1: Program Sampling Methodology Summary for Large Volume Quantifiable Goal/Target – Field Verifiable

Program	Units	Sections	Sampling Standard	PG&E Target[1]/Actual[2]	IE Field Sample Target
Weather Stations - Installations and Optimizations	EA	7.3.2.1.3 - B.02	ANSI/ ASQ Z1.4	100/111	20
High-Definition Cameras - Installations	EA	7.3.2.1.4 - B.03	ANSI/ ASQ Z1.4	98/100	20
Expulsion Fuse - Removal	EA	7.3.3.7 - C.01	ANSI/ ASQ Z1.4	3,000/3,085	125
Distribution Sectionalizing Devices - Install and SCADA commission	EA	7.3.3.8.1 - C.02	ANSI/ ASQ Z1.4	100/124	20
10K Undergrounding	Miles	7.3.3.16 - C.10	ANSI/ ASQ Z1.4	175/179.7	32
System Hardening - Distribution	Miles	7.3.3.17.1 - C.11	ANSI/ ASQ Z1.4	470/483	50
Surge Arrester - Removals	EA	7.3.3.17.3 - C.13	ANSI/ ASQ Z1.4	4,590/4,621	200
Enhanced Vegetation Management	Miles	7.3.5.2 - E.01	ANSI/ ASQ Z1.4	1,800/1,923.81	125
Pole Clearing Program	EA	7.3.5.2 - E.02	ANSI/ ASQ Z1.4	7,000/8,356	200
Utility Defensible Space - Distribution	EA	7.3.5.20 - E.09	ANSI/ ASQ Z1.4	7,000/7,168	200
Pole Clearing - per PRC 4292 in State Responsibility Areas (SRA)	EA	7.3.5.2 - E.10	ANSI/ ASQ Z1.4	80,258/80,208	500

[1] PG&E Targets reported per PG&E's 2022 Wildfire Mitigation Plan Dated July 26, 2022.

[2] PG&E Actuals reported per PG&E's 2022 Annual Report on Compliance (ARC) Report Dated March 31, 2023.

Large Volume Quantifiable Goal/Target – Not Field Verifiable

Similar to the Large Volume Quantifiable Goal/Target Field Verifiable noted previously, the IE applied the same sampling methodologies and standards to program targets to ensure the sampling quantities were statistically acceptable. The sample sizes were also determined using Mil-Std-105-E, an attribute sampling plan adopted in 1995 by the American National Standards Institute (ANSI) / American Society for Quality (ASQ) Z1.4-2008. When PG&E's actual quantity of completed work exceeded the amount targeted, the greater and 'actual' number was used when determining the sample quantities. According to the standard, general inspection level two should be used and was applied as the default inspection level unless otherwise specified. In some cases, when the number of items to be examined (target) was ten or less, 100% sampling was used. See Table 2: Program Sampling Methodology Summary for Large Volume Quantifiable Goal/Target Not Field Verifiable that summarizes the individual program targets, actuals, sampling methodologies/standards, and the IE sample size/target.

The IE made initial data requests on these program targets to review the work completed and identify and request completion records for the sample size in conformance with the sampling methodology described herein. The IE has also made data requests on these program targets to review, where applicable, standards, as-builts, and relevant QA/QC program documentation.

The IE assessed the following 12 items provided as part of PG&E's 2022 WMP's list of initiatives under section **3.1.3 Large Volume Quantifiable Goal/Target - Not Field Verifiable**.

Table 2: Program Sampling Methodology Summary for Large Volume Quantifiable Goal/Target – Not Field Verifiable

Program	Units	Sections	Sampling Standard	PG&E Target[1]/Actual[2]	IE Sample Target
Detailed Inspections - Distribution	EA	7.3.4.1 - D.01	ANSI/ ASQ Z1.4	396,000/398,184	800
Detailed Inspection Transmission – Ground	EA	7.3.4.2 - D.02	ANSI/ ASQ Z1.4	39,000/39,005	500
Detailed Inspection Transmission – Climbing	EA	7.3.4.2 - D.03	ANSI/ ASQ Z1.4	1,800/1,835	125
Detailed Inspection Transmission – Aerial	EA	7.3.4.2 - D.04	ANSI/ ASQ Z1.4	39,000/39,004	500

Infrared Inspections - Distribution	Miles	7.3.4.4 - D.05	ANSI/ ASQ Z1.4	9,000/9,560	200
HFTD/HFRA Open Tag Reduction - Distribution	EA	7.3.4.17 - D.10	ANSI/ ASQ Z1.4	55,000/45,951	500
HFTD/HFRA Open Tag Reduction - Transmission	EA	7.3.4.17 - D.11	ANSI/ ASQ Z1.4	18,000/21,145	315
LiDAR Ground Inspections - Distribution	Miles	7.3.5.7 - E.03	ANSI/ ASQ Z1.4	2,000/3,358.66	200
LiDAR Routine Inspections - Transmission	Miles	7.3.5.8 - E.04	ANSI/ ASQ Z1.4	18,000[3]/17,867	315
Vegetation Management - Quality Assurance and Quality Verification	EA	7.3.5.13 - E.05	ANSI/ ASQ Z1.4	QAVM 1. 43/43 2. 1/1 3. 1/1 4. 4/4 QVVM 1. 1,522/1,640 2. 260/349 3. 3,421/3,469	QAVM 1. 5 2. 1 3. 1 4. 4 QVVM 1. 125 2. 50 3. 200
Defensible Space Inspections - Distribution Substation	EA	7.3.5.17.1 - E.06	ANSI/ ASQ Z1.4	132/132	20
EPSS - Install Settings on Distribution Line devices	EA	7.3.6.8 - F.02	ANSI/ ASQ Z1.4	3,580/3,580	200

[1] PG&E Targets reported per PG&E's 2022 Wildfire Mitigation Plan (WMP) dated July 26, 2022.

[2] PG&E Actuals reported per PG&E's 2022 Annual Report on Compliance (ARC) Report dated March 31, 2023.

[3] Per the ARC report, PG&E noted that the original target identified as 18,000 "circuit miles" was intended to have meant "line miles" per the Energy Safety definition, which accounts for the difference in the 2022 WMP Target and reported actual mileage for transmission circuits as noted in PG&E's Quarterly Initiative Update (QIU) for the second quarter of 2022, dated August 1, 2022. See Section 3.1.3 herein for further details.

Sampling Distribution

The regional subsets were used to create a more comprehensive and complex understanding of the data, which allowed the IE to better understand the relationships between the different regions, field-verified items, and how they interact. The six regional planning efforts incorporated measures such as sampling standards, crew sizes, production rates, schedule durations, individual initiative types, distribution throughout PG&E's HFTD, respective county populations, and inspected infrastructure densities.

The IE conducted an independent site selection process to determine sample locations for field verifications taken from the populated data for each initiative. The IE also applied Random Sampling to all six regions. Sampling was targeted within HFTD Tiers 2 and 3 areas in all cases. Further, it targeted high-density areas to improve field inspection efficiency and maximize sampling quantities.

Sample sizes and their analysis were adequate for a general understanding of the reviewed items. The sample sizes over time allotments are not substantial to provide a definite accounting of item qualities or miles stated within PG&E's 2022 WMP targets. However, as requested in the Final IE Scope of Work document, general and linear extrapolations and deductions were made from the sample size results, which were distributed as defined within this document. These included the actual installation or removal of the item (work completion), general work quality, adherence to protocols, standards, and procedures, and item location or confirming operational outputs.

See Figure 3: Overview of Areas Sampled, which provides a general overview of the locations sampled within Section 3.1.2 Large Volume Quantifiable Goal/Target - Field Verifiable.

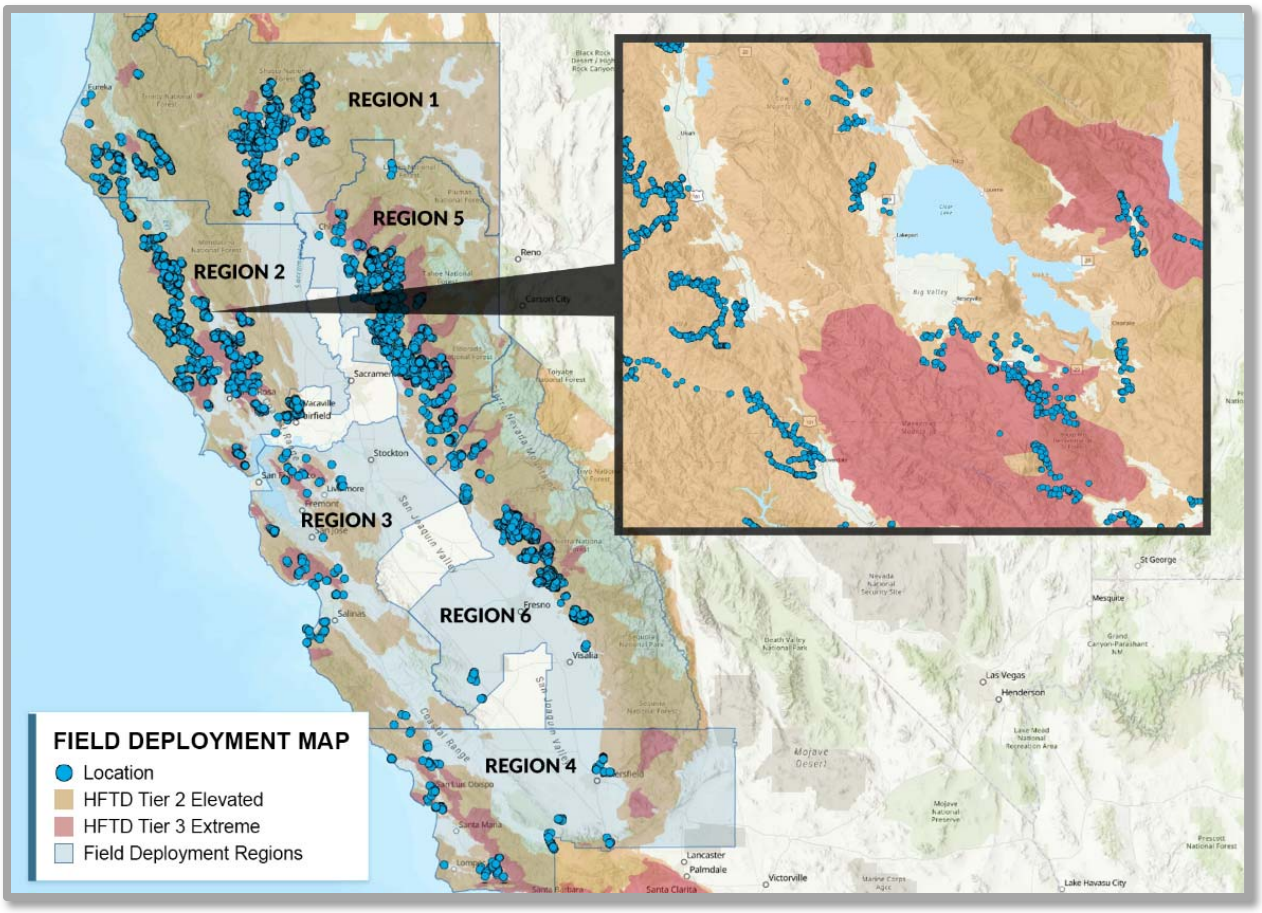

Figure 3: Overview of Areas Sampled

3.1.2 Large Volume Quantifiable Goal/Target – Field Verifiable

3.1.2.1 Review of Initiatives

The following information comprises detailed descriptions of the IE's assessments of PG&E's various initiatives categorized as Large Volume Quantifiable Field Verifiable. The approach to assessing each initiative, along with the IE's findings, are described in this section.

7.3.2.1.3 - B.02 - Weather Stations - Installations and Optimizations

Information gathered from PG&E's weather stations located throughout their territory help forecast and monitor for high fire-risk weather conditions. PG&E committed to installing or optimizing 100 weather stations on a pole, tower, or other assets in HFTD areas during 2022, per Table PG&E-5.3-1(A): List and Descriptions of Quantitative Program Targets, Last Five Years of the 2022 WMP, dated July 26, 2022. PG&E's goal to install or optimize 100 additional weather stations was met and exceeded by 11 weather stations, installing or optimizing 111 weather stations per PG&E's self-reporting.

A sample of 20 weather stations was field verified by the IE. All 20 were found at the location coordinates identified by PG&E. No workmanship issues were identified in the review of the weather station installations. The IE requested the locations and IP addresses for all 111 weather stations. All 111 weather stations were found to be at the coordinates provided by PG&E. An analysis of the data from the IE's verification of the complete initiative suggests that PG&E met and exceeded the commitment to install weather stations, as reported. Additionally, the IE team reviewed how PG&E selects, executes, closes, and tracks the overall enhancements to the Weather Station project initiative and found it aligned with the initiative description as described within the 2022 WMP. . For illustrative examples of these observations, please refer to Figure 4 provided below.

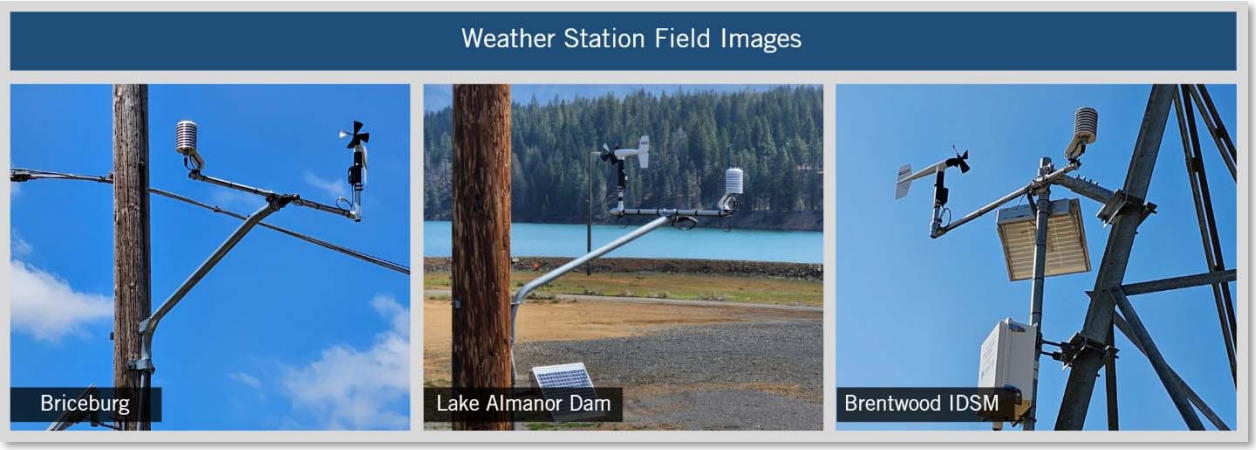

Figure 4: Example Weather Station Field Images

The IE reviewed the 111 weather stations' data output to confirm they were operational on PG&E's third-party validation website provided in confidentiality within data request DRU11551. Six (6) of the 111 weather stations did not have current data available for more than 30 days, and their operational status remains unconfirmed; six (6) or 5.4% of 111 were identified as potentially non-operational, example as shown below per "Figure 5: Weather Station Graphic."

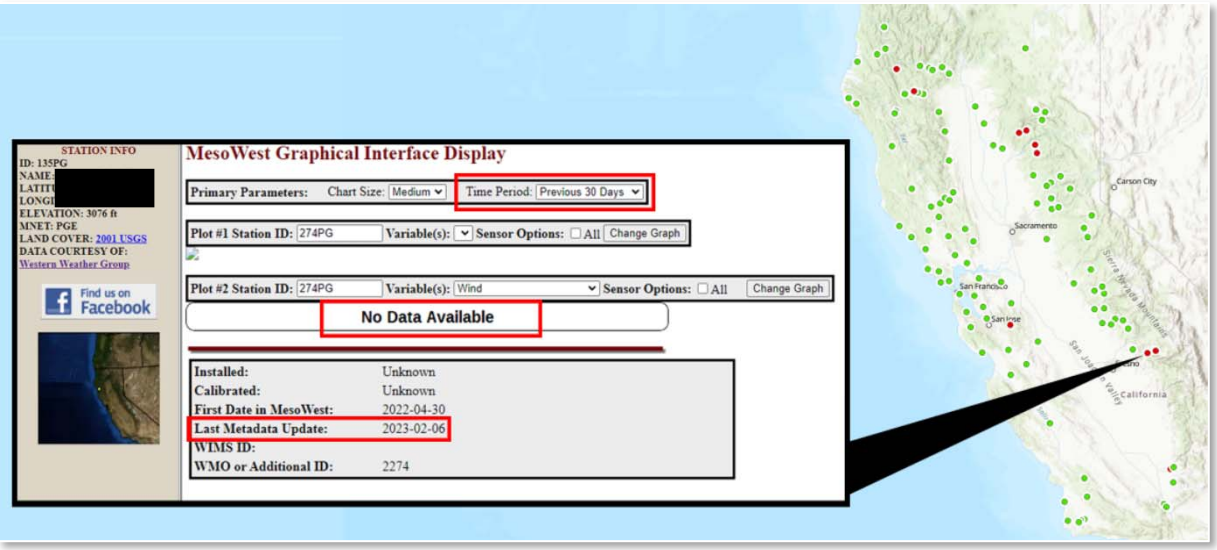

Figure 5: Weather Station Graphic

7.3.2.1.4 - B.03 - High-Definition Cameras – Installations

High-definition (HD) wildfire cameras are used to identify, confirm, and track wildfires by PG&E and California state agencies. PG&E committed to installing and operationalizing 98 additional HD cameras during 2022, per Table PG&E-5.3-1(A) of the 2022 WMP, dated July 26, 2022. PG&E's goal to install 98 additional HD cameras was met and exceeded by an additional two (2) HD cameras, installing 100 HD cameras per PG&E's self-reporting.

The IE requested the locations and IP addresses for all 100 HD cameras. All 100 cameras were found to be at the coordinates provided by PG&E. An analysis of the data from the IE's verification of the complete initiative suggests that PG&E met and exceeded the commitment to install HD cameras as reported. Additionally, the IE team reviewed how PG&E selects, executes, closes, and tracks the overall HD Camera initiative and found it aligned with the initiative description as described within the 2022 WMP.

The IE verified the 100 HD cameras' operation by reviewing the imagery within each HD camera's IP address; as provided by PG&E as a part of data request DRU11552, the live imagery and date/time stamp displayed were compared with the current date and time. The IE verified location coordinates and that each camera faced a Tier 2 or Tier 3 viewshed. Time-lapse data was reviewed to verify operation of cameras with partially digitally obscured viewsheds. One (1) out of 100 HD cameras, or 1%, were identified as having unconfirmed operational status. See "Figure 6: HD Cameras Deployment" below for an example of a non-operational camera.

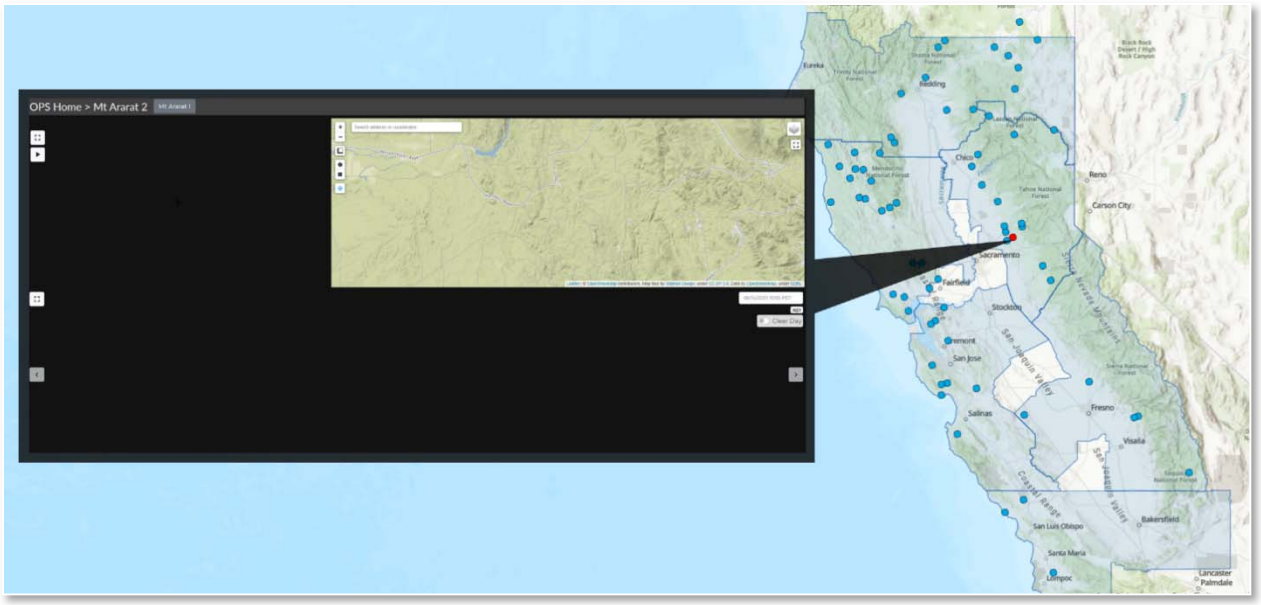

Figure 6: HD Cameras Deployment

7.3.3.7 - C.01 - Expulsion Fuse - Replacement

Removal of non-exempt expulsion fuses and replacement with exempt fuses considered non-expulsion and operating without creating arcs or sparks contributes to the overall goal of minimizing the risk of ignition in HFTD areas. PG&E committed to removing 3,000 non-exempt fuses/cutouts identified on poles in Tier 2 and Tier 3 HFTD areas in 2022 per Table PG&E-5.3-1: List and Description of Quantitative Program Targets, Last Five Years. PG&E's goal to remove 3,000 non-exempt fuses/cutouts was met and exceeded by 85 units, removing 3,085 non-exempt fuses/cutouts, per PG&E's reporting.

The program definition of removal is defined in Section 7.3.3.7 Expulsion Fuse Replacement of the 2022 WMP and as per the confidential response to Data Request DRU11572. The IE field assessment team utilized the California Power Line Fire Prevention Guide, 2021 Edition, as their ruling document to validate Exempt equipment installations (Pages 81-87, Figures B-1 through B-21) vs. Non-Exempt (Pages 54-62, Figures NE-1 through NE-18). For illustrative examples of these observations, please refer to Figure 7: Example Expulsion Fuse Replacement Field Images, provided below.

Figure 7: Example Expulsion Fuse Replacement Field Images

The IE verified a sample of 201 non-exempt expulsion fuse replacement locations to be replaced with exempt equipment. The IE's target goal of 125 field-verified locations was exceeded by 76, for a total of 201 sampled sites that complied with the initiative and completed the removal of fuses/cutouts and other non-exempt equipment. Based on the IE's verification sample and results, it appears likely that PG&E met its stated commitment to remove and replace 3,000 non-exempt fuses/cutouts and exceeded 85 units for a total of 3,085 non-exempt fuses/cutouts being replaced, as reported.

Field assessments of the expulsion fuse removals were reviewed for workmanship quality and accuracy of the information in alignment with the initiative description as described within the 2022 WMP. The following issues or data discrepancies were identified during the field assessment:

- The location of one structure does not match the coordinates provided. The structure is located approximately 400 feet west of the coordinates.

7.3.3.8.1 - C.02 - Distribution Sectionalizing Devices - Install and SCADA Commission

Distribution Sectionalizing Devices provide the ability to divide the grid into smaller sections for greater operational flexibility to control which areas of the grid more precisely are impacted by a Power Safety Power Shutoff (PSPS) event. PG&E has committed to adding 100 automated sectionalizing devices during 2022, incorporating lessons learned from prior installations, including device location strategies, construction installation means, and method improvements. Per Table PG&E-5.3-1: List and Description of Quantitative Program Targets, Last Five Years, PG&E's goal to install at least 100 distribution sectionalizing devices was met and exceeded by 24 units, installing 124 devices per PG&E's self-reporting.

The program definition of installation is defined in Section 7.3.3.8.1 Distribution Line Sectionalizing of the 2022 WMP and as per the confidential response to Data Request DRU11572. The IE field assessment team utilized the California Power Line Fire Prevention Guide, 2021 Edition, as their ruling document for validation of Exempt equipment installations (Page 97, Figures B-45 through B-47) as well as pertinent Switches (Pages 90-95, Figures B-26 through B-41) and pertinent Disconnects (Page 96, Figures B-42 through B-44). For illustrative examples of these observations, please refer to Figure 8: Example Distribution Sectionalizing Devices Field Images, provided below.

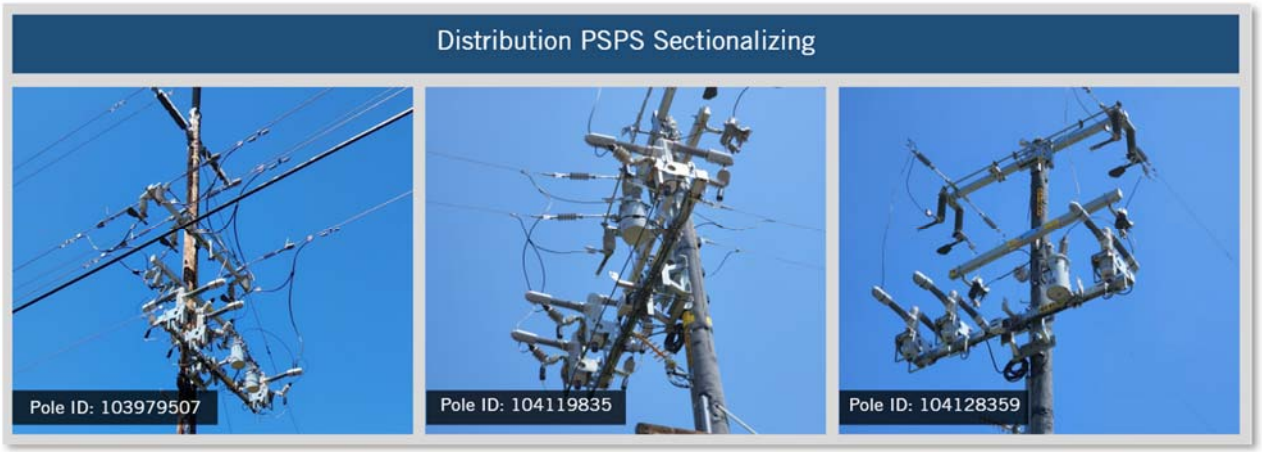

Figure 8: Example Distribution Sectionalizing Devices Field Images

The IE verified a sample of 25 sectionalizing distribution devices installed and commissioned in 2022. The IE's target goal of 20 field-verified locations was exceeded by five, for a total of 25 sampled sites that complied with the initiative. Based on the IE's verification sample and results, it appears likely that PG&E met its commitment to install 100 devices and exceeded the total with 124 devices, as reported.

Field assessments of the distribution sectionalizing devices were reviewed for workmanship quality and accuracy of the information, in alignment with the initiative description as described within the 2022 WMP. The following issues or data discrepancies were identified during the field assessment:

- The locations of two structures do not match the coordinates provided. One structure is located approximately 165 feet west of the coordinates, while the other is located approximately 175 feet east of the coordinates.

Additionally, the IE team reviewed how PG&E selects, executes, closes, and tracks the overall Distribution Sectionalizing Devices initiative and its various process flows and found them to align

with the initiative description as described within the 2022 WMP. 7.3.3.16 - C.10 - 10K Undergrounding.

The 10K undergrounding Initiative, as described within Section 7.3.3.16, was launched in July 2021 as a separately tracked initiative from 7.3.3.17 that is designed to prioritize high-risk areas for undergrounding electrical to reduce the risk of wildfire ignition caused by overhead distribution assets such as tree fall-in risks. As noted within the 2022 WMP, PG&E's goal with this initiative "is to increase underground miles annually, ramping up to 1,200 miles or more of undergrounding by year by 2026." PG&E committed to undergrounding 175 highest-risk miles in 2022 per Table PG&E-5.3-1(A) of the 2022 WMP. This initiative's target includes undergrounding as part of the 7.3.3.17.1 System Hardening Initiative and the 7.3.3.17.6 Butte County Rebuild effort. PG&E's goal to underground 175 miles was met and exceeded by 4.7 miles, undergrounding a total of 179.7 miles, per PG&E's reporting. The IE verified a sample representing 34.17 miles of undergrounding with field verification, exceeding the field-verified location miles by 2.17 miles, and included additional high-resolution satellite-based verification. The IE used the information provided within Data Request DRU11572 to obtain general locations where the work was performed.

For satellite-based verification, the IE utilized the Pléiades Neo satellite (PNEO4) and the Pléiades 1A satellite (PHR1A) with a ground resolution of 0.5m and 0.3m per pixel respectively. Although the image resolution varies, the light and shadows of the historical satellite structure’s cross-arms and conductors are no longer visible in the 2023 satellite imagery, indicating that the structure has been removed and is shown within the red box comparisons found in Figures 9 and 11 provided below. The IE was able to confirm undergrounding and removals by comparing historical 2022 satellite imagery (Google Earth) to 2023 satellite imagery (AIRBUS Defense and Space GEO). The 2023 satellite imagery and field verification team both provided data showing the undergrounding work done left communication lines on topped poles as shown in Figures 9 and 11 below.

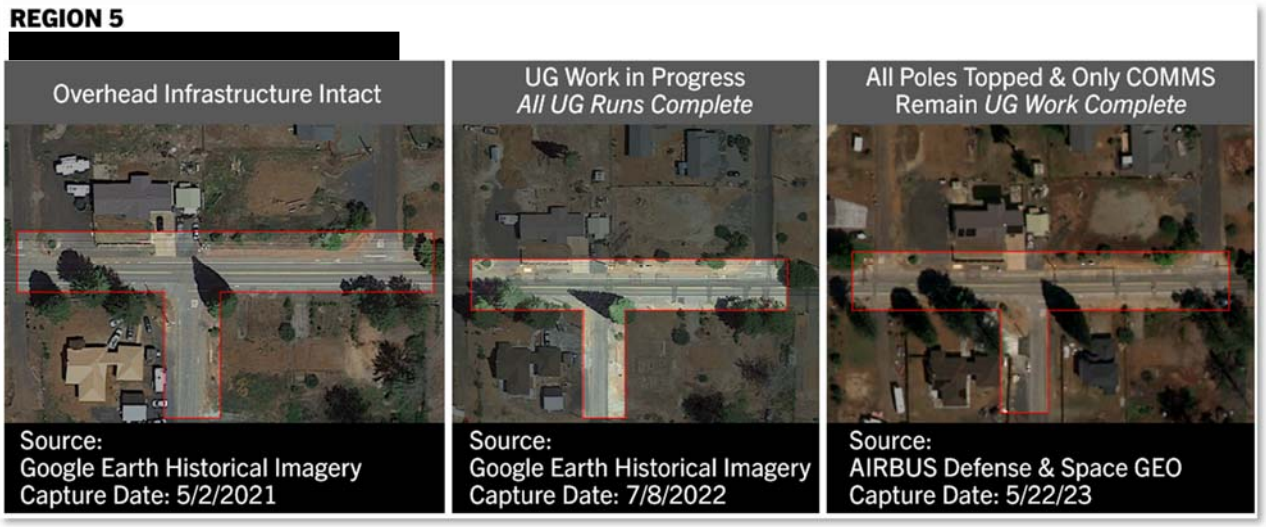

Figure 9: Historical 2021 and 2022 Satellite Imagery Comparison to 2023 Satellite Imagery Examples

Figure 10: Example Undergrounding Assets Field Image

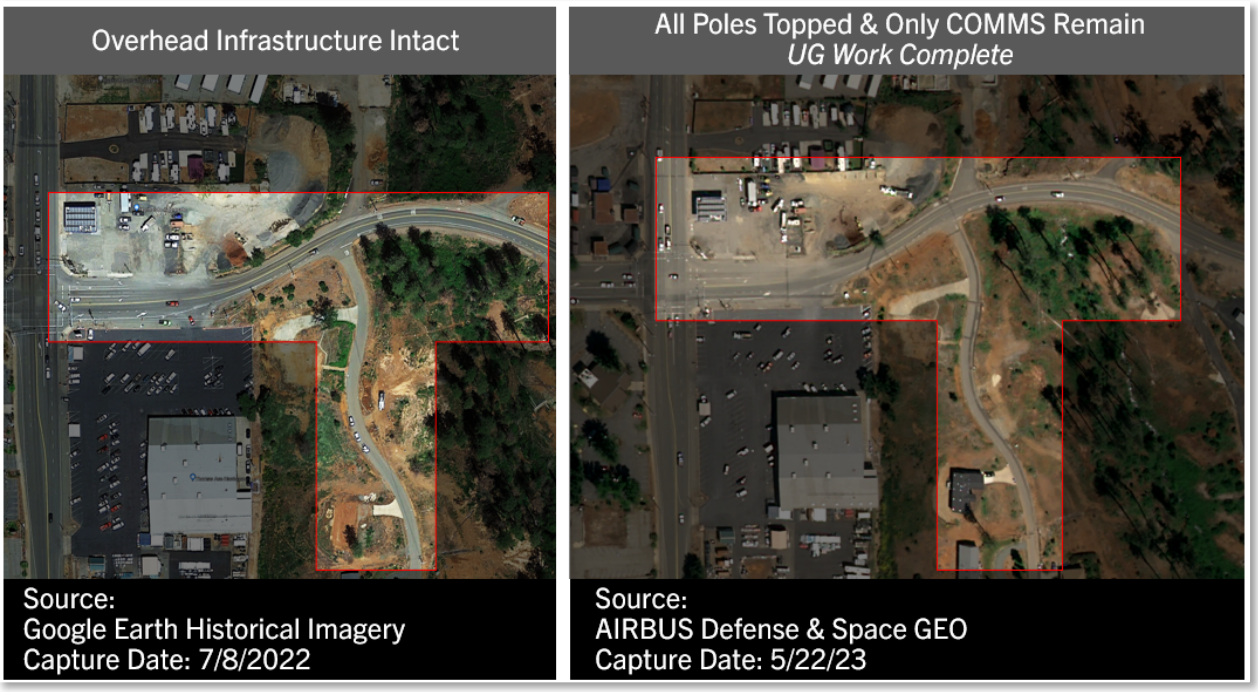

Figure 11: Historical 2022 Satellite Imagery Comparison to 2023 Satellite Imagery Examples

Figure 12: Example Undergrounding Assets Field Image

Based on the IE's verification sample, additionally provided documentation and satellite imagery, data suggest that PG&E met and exceeded their undergrounding commitment. No issues were identified, and based on the assessment of the undergrounding, the work quality is satisfactory in alignment with the initiative description as described within the 2022 WMP.

7.3.3.17.1 - C.11 - System Hardening - Distribution

Distribution system hardening employs a variety of initiatives designed and prioritized to reduce the risk of wildfire ignition caused by overhead distribution assets. The initiatives are prioritized first to consider line removal opportunities followed by undergrounding, which provides additional risk reduction benefits such as avoiding tree fall-in risks. Other alternatives, such as

applying remote grid alternatives and relocating overhead facilities, are also considered. When in-place overhead system hardening is assessed as an alternative, the detailed consideration process is described within Section 7.3.3.17.1 System Hardening - Distribution of the 2022 WMP.

PG&E committed to system hardening 470 highest-risk miles in 2022 per Table PG&E-5.3-1(A) of the 2022 WMP. PG&E's goal to harden 470 miles was met and exceeded by 13 miles, system hardening a total of 483 miles, per PG&E's reporting. The IE field verified a sample representing 51.26 miles of system hardening, exceeding the field-verified location miles by 1.26 miles. The IE used the information provided within Data Request DRU11572 to obtain general locations where the work was performed. For illustrative examples of these observations, please refer to Figure 13: Example System Hardening Distribution Pole Field Images, provided below.

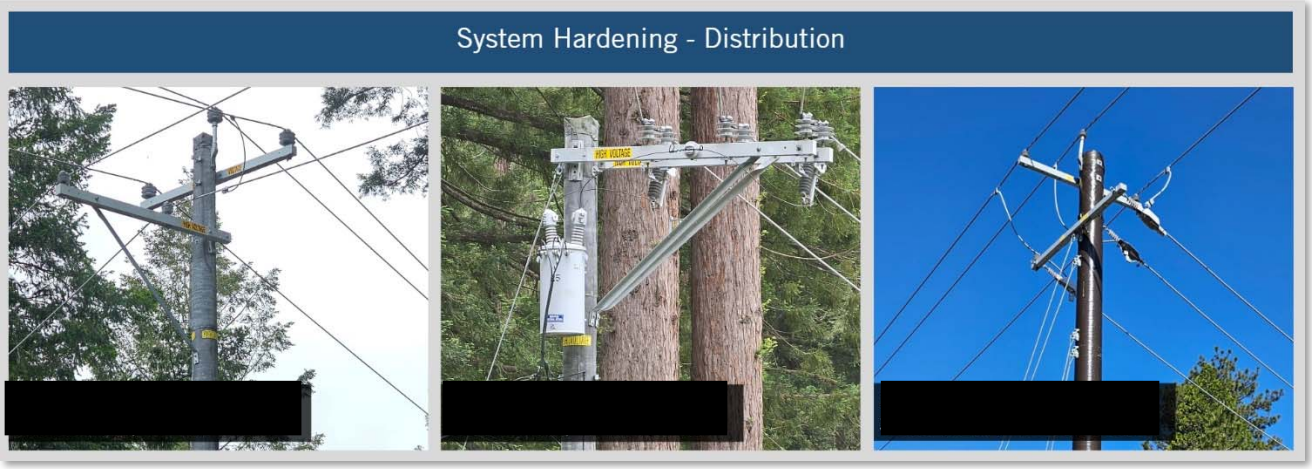

Figure 13: Example System Hardening Distribution Pole Field Images

Based on the IE's verification sample, additionally provided documentation and satellite imagery, data suggest that PG&E met and exceeded their distribution system hardening commitment. No issues were identified and based on the assessment of the distribution system hardening, the work quality is satisfactory.

7.3.3.17.3 - C.13 - Surge Arrester - Removals

Removal of non-exempt surge arresters with exempt surge arresters (CAL FIRE exempt and certified) that operate without creating arcs or sparks during regular operation contributes to the overall goal of minimizing the risk of ignition in HFTD areas. PG&E committed to removing 4,590 non-exempt surge arresters in Tier 2 and Tier 3 HFTD areas in 2022 per Table PG&E-5.3-1(A) of the 2022 WMP. PG&E's goal to remove 4,590 non-exempt surge arresters was met and exceeded by 31 units, removing or mitigating 4,621 non-exempt surge arresters, per PG&E's reporting.

Section 7.3.3.17.3 Non-Exempt Surge Arrester Replacement Program of the 2022 WMP defines the initiative program definitions of replacement and mitigation. The IE field assessment team

utilized the California Power Line Fire Prevention Guide, 2022 Edition, as their ruling document to validate Exempt equipment installations: (Pages 113- 114, Figures B-86 through B-88) vs. Non-Exempt (Pages 63-67, and Figures NE-19 through NE-28). For illustrative examples of these observations, please refer to Figure 14: Example Poles with Removed Surge Arresters Field Images, provided below.

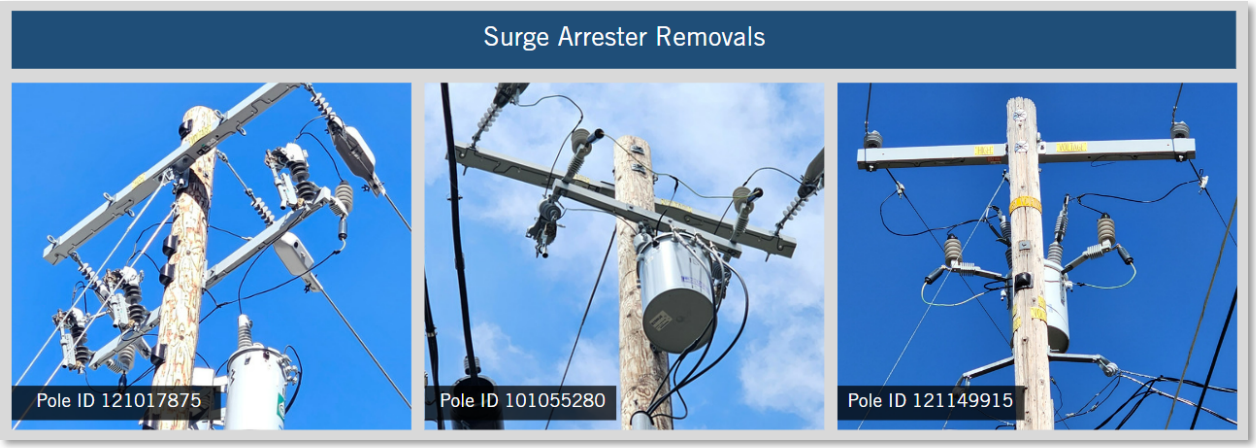

Figure 14: Example Poles with Removed Surge Arresters Field Images

The IE verified a sample of 200 surge arrester locations that were to be mitigated or replaced with exempt equipment. 198 were found to be in compliance with the initiative, and two (2) of the sampled locations, or 1% of the structures sampled, were found to be out of compliance. The following non-compliance issues were identified during the field assessment:

- One of the structures was found to include a non-exempt surge arrester present at the time of field verification; additionally, the top of the pole has severe woodpecker damage.
- One of the structures did not show signs of new construction, the structure includes an older self-protected transformer with avian guards and exempt connectors installed.

Based on the IE's verification sample, it appears likely that PG&E met its stated commitment to mitigate or replace 4,590 surge arrester removals as reported.

Additionally, the IE team reviewed how PG&E selects, executes, closes, and tracks the overall surge arrester removals initiative, and various process flows and found them to align with the initiative description as described within the 2022 WMP.

Field assessments of the surge arrester removals initiative were also reviewed for workmanship and accuracy of information. The following data discrepancies were identified during the field assessment:

- The locations of three structures do not match the coordinates provided. One structure is approximately 200 feet east of the coordinates, the second is approximately 185 feet south of the coordinates, and the third is approximately 134 feet west of the coordinates.

7.3.5.2 - E.01 - Enhanced Vegetation Management

PG&E's Enhanced Vegetation Management (EVM) Program, encompassing a range of inspection patrols, mitigates potential risks across an expansive network of approximately 80,000 miles of overhead distribution electric facilities. The program's initiative is clearly outlined in Section 7.3.5.2 - Detailed Inspections and Management Practices for Vegetation Clearances Around Distribution Electrical Lines and Equipment - of the 2022 Wildfire Mitigation Plan (WMP).

Outlined in the 2022 WMP, as per Table PG&E-5.3.-1(A), PG&E committed to completing and validating 1,800 risk-ranked distribution circuit miles. The EVM program surpassed this goal by completing 1,923.8 circuit miles by the end of 2022, thereby exceeding the target by 123.8 circuit miles. In addition, 98.7% of the EVM work was concentrated on the top 20% of the highest risk-ranked miles, as indicated by PG&E's reporting.

In the 2022 Wildfire Mitigation Plan (WMP), PG&E implemented an EVM Tree Weighted Prioritization, as detailed in section 4.5.1(e) - Enhanced Vegetation Management Tree Weighted Prioritization. The IE team was provided an overview of this model by PG&E, along with a comprehensive Excel spreadsheet in response to data request DRU11578. This spreadsheet included conductor segment midpoints, latitude and longitude coordinates, circuit names, the number of miles completed, respective completion dates, risk rankings, and definitions.

Based on the provided information, the reported figure of 1,923.8 circuit miles, as depicted in the spreadsheet, contained 129 circuits and more than 797 thousand trees. The work classification included tree patrols, removals, trimming, overhang work, and other associated tasks. The data from PG&E match their reported 1,938.8 circuit miles for this initiative.

The IE team incorporated the provided information into its field sampling plan with an initial target of 125 circuit miles. The goal was surpassed, with the IE team field verifying 177 circuit miles, exceeding the target by 52 miles, encompassing over 33,000 trees across 43 circuits. To further verify patterns and trends associated with the tree removal work, the IE team validated an office-based sample of an additional 20 circuit miles, utilizing high-resolution satellite imagery sourced from the Pléiades Neo (PNEO4) and the Pléiades 1A (PHR1A) satellites, courtesy of Airbus Defense & Space. In reviewing the satellite imagery, the reported tree removal work matched the information and areas of work completed provided by PG&E; refer to the imagery samples depicted in Figures 15 and 16 below. Upon a thorough review of the data provided and the IE team's field verification samples, it appears likely that PG&E fulfilled its commitment of 1,800

EVM circuit miles and exceeded it by an additional 123.8 miles for a total of 1,923.8 circuit miles as reported.

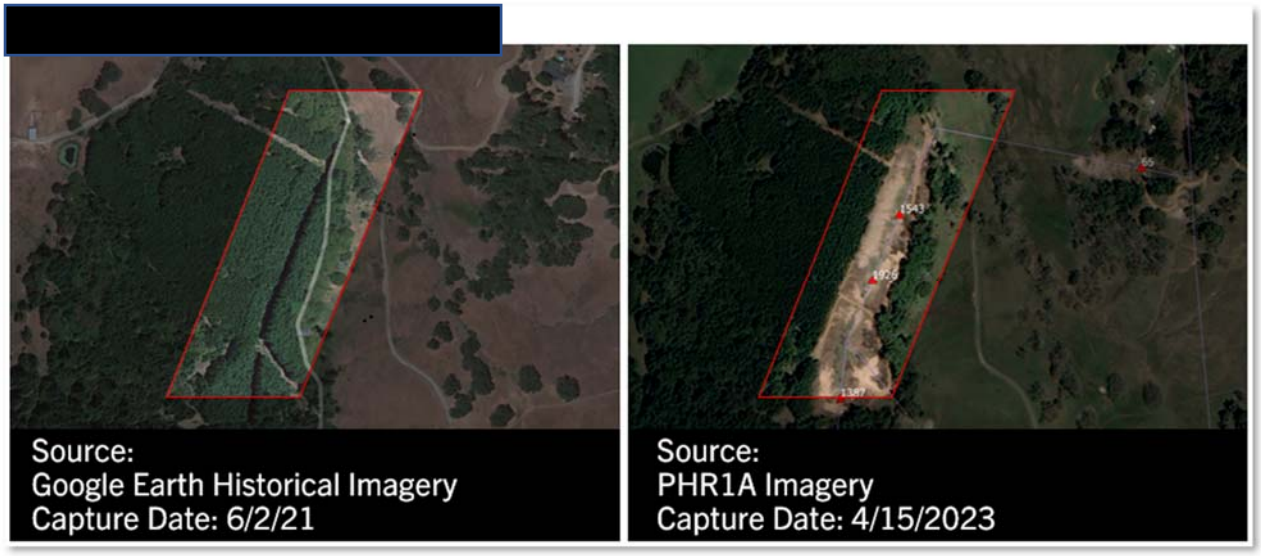

Figure 15: Historical 2021 Google Earth Imagery Comparison to 2023 PHR1A Imagery
The above satellite verification area represents 4,912 trees removed in 0.31 circuit miles

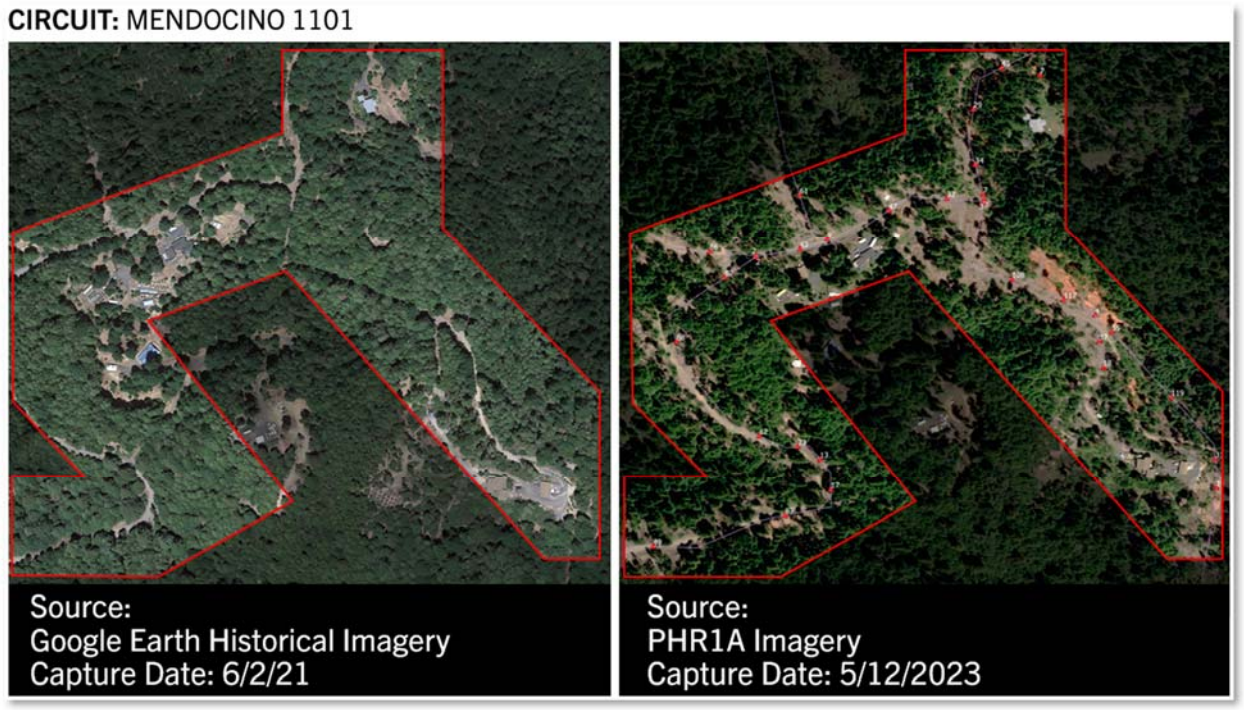

Figure 16: Historical 2021 Google Earth Imagery Comparison to 2023 PHR1A Imagery
The above satellite verification area represents 1,282 trees removed in 1.1 circuit miles

Field evaluations of the EVM work were reviewed for workmanship quality, compliance with the initiative, and the accuracy of the reported information. Factors such as the timing of completed work and subsequent impacts of regrowth were taken into consideration. During the field assessments, the IE team identified several issues. To better understand and visualize these concerns, please refer to the information and Figures 17, 18, 19, and 20 provided below.

- While the areas inspected by the IE field teams adhered to the initiative description as described within the 2022 WMP, a discrepancy was observed at 15 segment locations. These sites, representing work classifications of 248 tree removals, 22 tree trims, and 16 instances of overhang work, were found to have various amounts of residual debris surrounding the remediated trees. For illustrative examples of these observations, please refer to Figures 17, 18, and 19 provided below.

Figure 17: Example Enhanced Vegetation Management Field Images
The above field verification area represents 27 Removals, 1 Trim, and 20 Assessment trees within 0.028 circuit miles.

Figure 18: Example Vegetation Debris Field Image
Above: Logs left behind. Tagged with pink tape.

Figure 19: Example Vegetation Debris Field Image
Above: Large logs left behind. PG&E Data shows work completion on 12/9/2022.

Figure 20: Example Vegetation Debris Field Image
Above: Logs left behind. Resident approached field personnel and inquired about when logging crew would remove the left-over debris

7.3.5.2 - E.02 - Pole Clearing Program

PG&E designed the Pole Clearing Program initiative to inspect and clear (where clearance is needed) all poles identified in PG&E's Vegetation Database within HFTD areas or HFRA, not required by PRC 4292. Currently, the program is navigating a transition from a legacy database towards a modernized vegetation management technology tool. As per PG&E's Q4 Quarterly Data Report (QDR) dated March 1, 2023, PG&E committed to inspecting and clearing 7,000 poles in 2022. PG&E met and exceeded its target by 1,356 poles, leading to the inspection and clearance of a total of 8,356 poles, per PG&E's reporting.

The program definition for vegetation clearance is defined in 7.3.5.2 Detailed Inspections and Management Practices for Vegetation Clearances Around Electrical Distribution Lines and Equipment of the 2022 WMP and as per the data request DRU11578. The IE field assessment team utilized the California Power Line Fire Prevention Guide, 2021 Edition, as their ruling document for validation of pole clearances (Pages 21-22, Figures 10 through 12) as well as hazard trees/vegetation clearances (Pages 42-52). For illustrative examples of pole clearing observations, please refer to Figure 21: Example Pole Clearing Field Images, provided below.

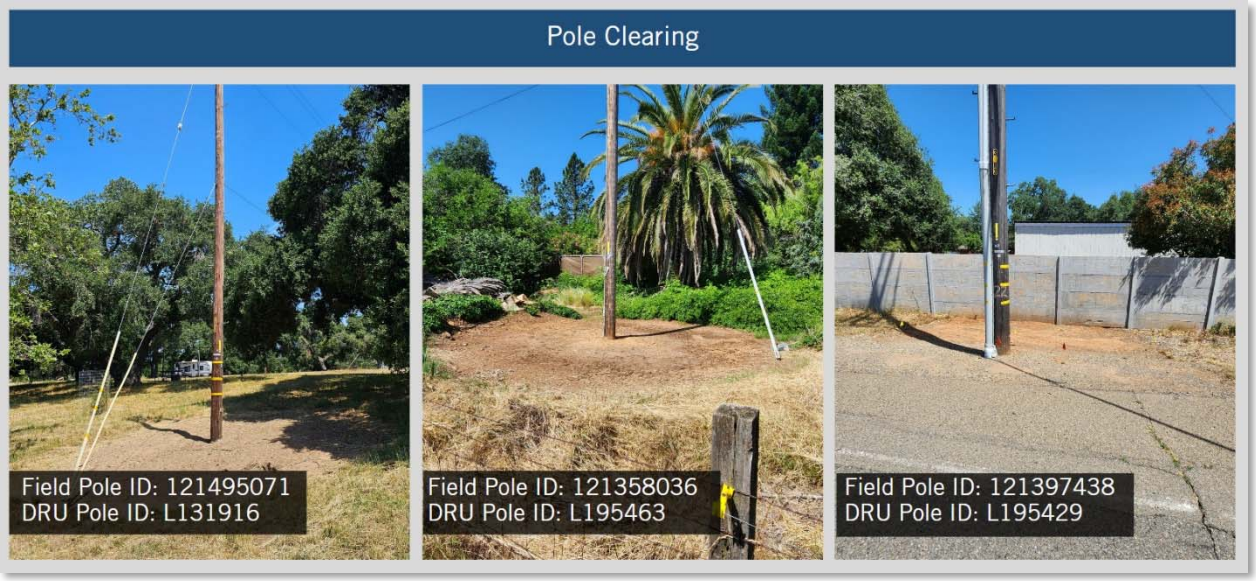

Figure 21: Example Pole Clearing Field Images

Using the information provided in the data request, the IE field verified a sample of 201 distribution structures cleared in 2022. All 201 structures were found to comply with the initiative. Regarding data accuracy, the physical locations of four (4) structures do not align with the provided coordinates, with discrepancies ranging approximately between 75 to 200 feet from the specified points. Upon a thorough review of the data provided and the IE team's field verification samples, it appears likely that PG&E fulfilled its commitment of 7,000 poles and exceeded it by an additional 1,356 poles for a total of 8,356 poles. Field assessments of the pole clearings were reviewed for workmanship quality, the accuracy of the information, and compliance with the initiative. Additionally, the IE team reviewed how PG&E selects, executes, closes, and tracks the overall Pole Clearing Program initiative and its various process flows and found them to align with the initiative description as described within the 2022 WMP. In contrast to prior reports where exempt structures were commonly integrated into the analysis of deficiencies, this year structures were distinctly classified under DRU11578. This was noted by the IE team during their field review. For illustrative examples of these observations, please refer to Figure 22: Example Poles with Landscape Exemptions, provided below.

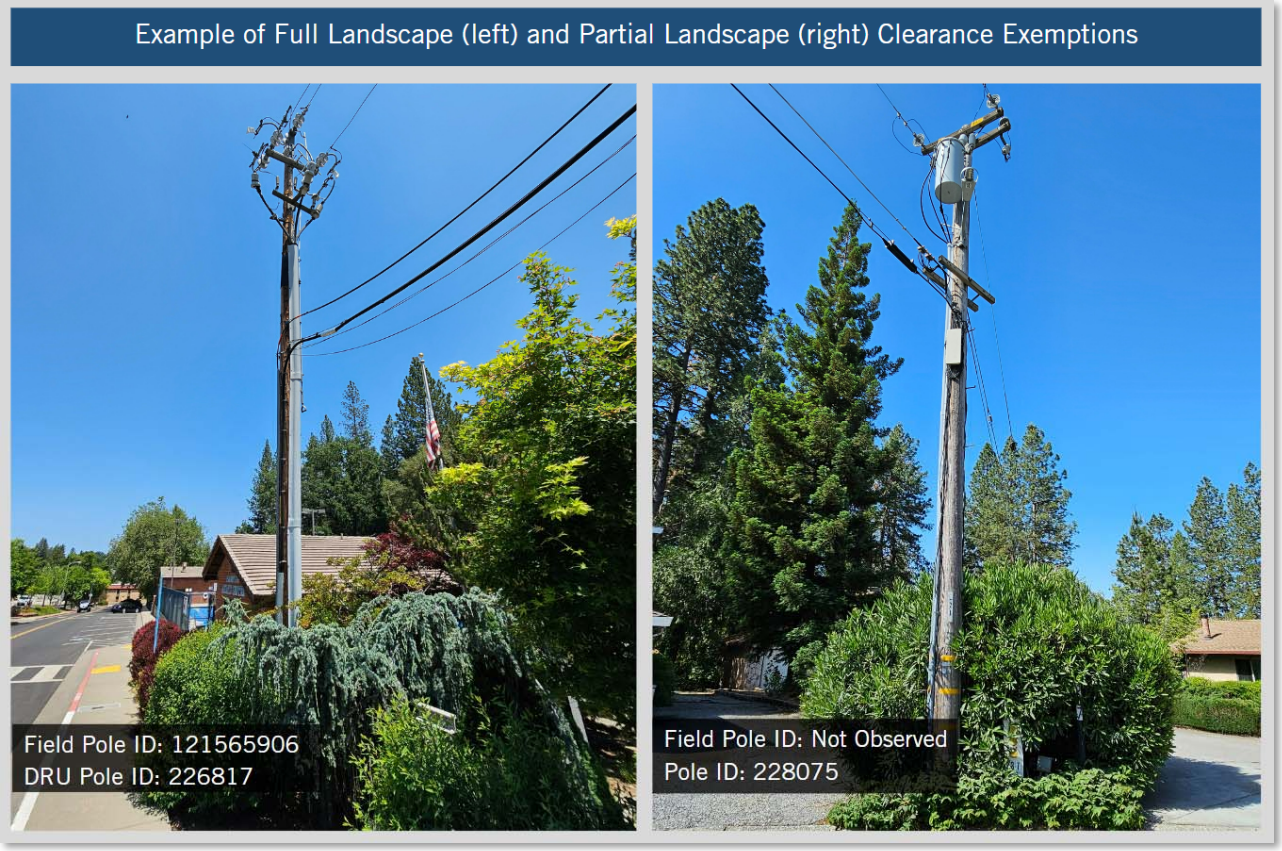

Figure 22: Example Poles with Landscape Exemptions

7.3.5.20 - E.09 - Utility Defensible Space - Distribution

The practice of maintaining defensible utility space mitigates the risk of fire ignition or propagation. Limiting the presence of vegetation and potential combustibles beneath and adjacent to distribution lines in HFTD areas reduces the likelihood of fires. PG&E used the top 20 percent of risk areas for this target as they relate to the circuit segment risk rankings from PG&E's Wildfire Consequence Model outputs, further described in Section 4.5.1(d) of the 2022 WMP update. PG&E committed to inspecting and clearing 7,000 poles in HFTD areas, per Table PG&E-5-3-1(A) of the 2022 WMP. PG&E met and exceeded its target by 168 poles, leading to the inspection and clearing of a total of 7,168 distribution poles per PG&E's self-reporting.

The program definition for vegetation clearance is defined in 7.3.5.20 Vegetation Management to Achieve Clearances Around Electric Lines and Equipment of the 2022 WMP and as per the data request DRU11578. The IE field assessment team utilized the California Power Line Fire Prevention Guide, 2021 Edition, as their ruling document for validation of pole clearances (Pages 21-22, Figures 10 through 12) as well as hazard trees/vegetation clearances (Pages 42-52). For illustrative examples of these observations, please refer to Figure 23: Example Utility Defensible

Space Field Image, and Figure 24: Historical 2021 Google Earth Imagery Comparison to 2023 PHR1A Imagery, provided below.

Figure 23: Example Utility Defensible Space Field Image

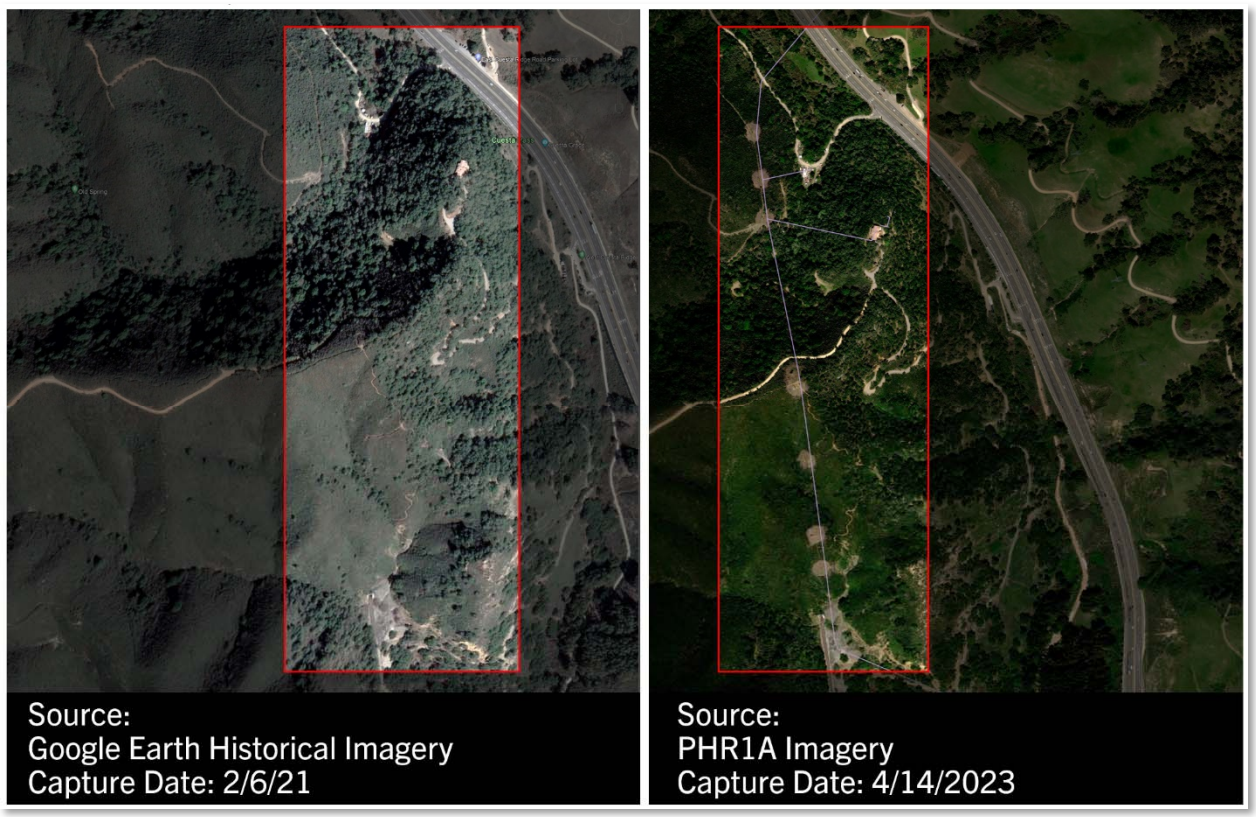

Figure 24: Historical 2021 Google Earth Imagery Comparison to 2023 PHR1A Imagery

Using the information provided in the data request, the IE field verified a sample of 205 distribution structures in HFTD areas cleared in 2022. Two hundred two distribution structures complied with the initiative requirements, and three (3), or 1.46% of the sampled locations, were found to be out of compliance. The three sites have old logs and brush within the 50' buffer area. Upon a thorough review of the data provided and the IE team's field verification samples, it appears likely that PG&E fulfilled its commitment of 7,000 poles, as reported. However, the data could not verify the reported exceeded the quantity of 7,168 distribution poles due to the 1.46% discrepancy. Field assessments of the pole clearings were reviewed for workmanship quality, the accuracy of the information, and compliance with the initiative. Additionally, the IE team reviewed how PG&E selects, executes, closes, and tracks the overall Utility Defensible Space - Distribution Program initiative and its various process flows and found them to align with the initiative description as described within the 2022 WMP. During the field assessment, we identified several issues. In addition, the IE team attentively tracked the patterns of regrowth, particularly as increased seasonal rainfall is stimulating the proliferation of vegetation. Figures 25 and 26, presented below, provide visual representation of these observations.

- Three (3) locations exhibit the presence of old logs, brush, and debris within the 50-foot buffer zone.
- Eight of the inspected structures, while appearing to have complied with the 2022 regulations, have experienced moderate vegetation regrowth, See Figure 25 presented below for a visual representation of these observations.

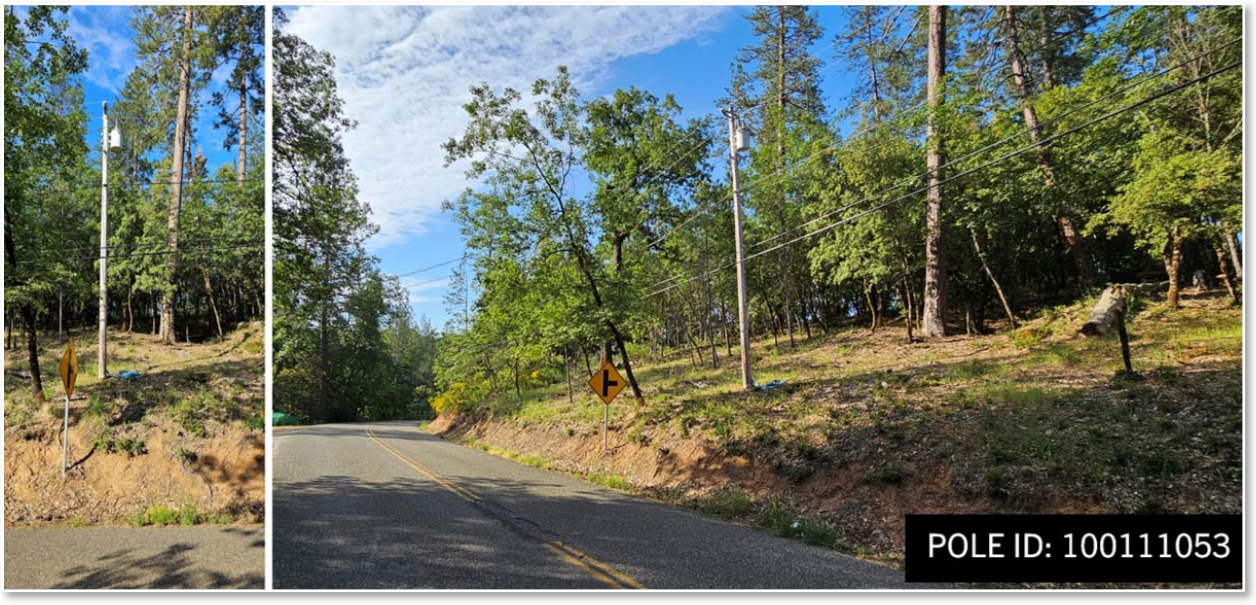

Figure 25: Example Utility Defensible Space with Vegetation Growth Field Image

Figure 26: Example Utility Defensible Space with Vegetation Growth Field Image

7.3.5.2 - E.10 - Pole Clearing - per PRC 4292 in State Responsibility Areas (SRA)

Ensuring appropriate pole clearing in State Responsibility Areas effectively reduces the overall risk of fire ignition or propagation by limiting the presence of vegetation and potential fuel sources. Currently, the program is navigating a transition from a legacy database towards a modernized vegetation management technology tool. As per Table PG&E-5-3-1(A) of the 2022 WMP and PG&E's Q4 Quarterly Data Report (QDR) dated March 1, 2023, PG&E committed to inspecting and clearing 80,258 poles in 2022. PG&E did not meet their target by 50 poles, leading to the inspection and clearance of a total of 80,208 poles, per PG&E's reporting.

The program definition for vegetation clearance is defined in 7.3.5.2 Detailed Inspections and Management Practices for Vegetation Clearances Around Electrical Distribution Lines and Equipment of the 2022 WMP and as per the data request DRU11578. The IE field assessment team utilized the California Power Line Fire Prevention Guide, 2021 Edition, as their ruling document for validation of pole clearances (Pages 21-22, Figures 10 through 12) as well as hazard trees/vegetation clearances (Pages 42-52). For illustrative examples of these observations, please refer to Figure 27: Example Pole Clearing in State Responsibility Areas Field Images, provided below.

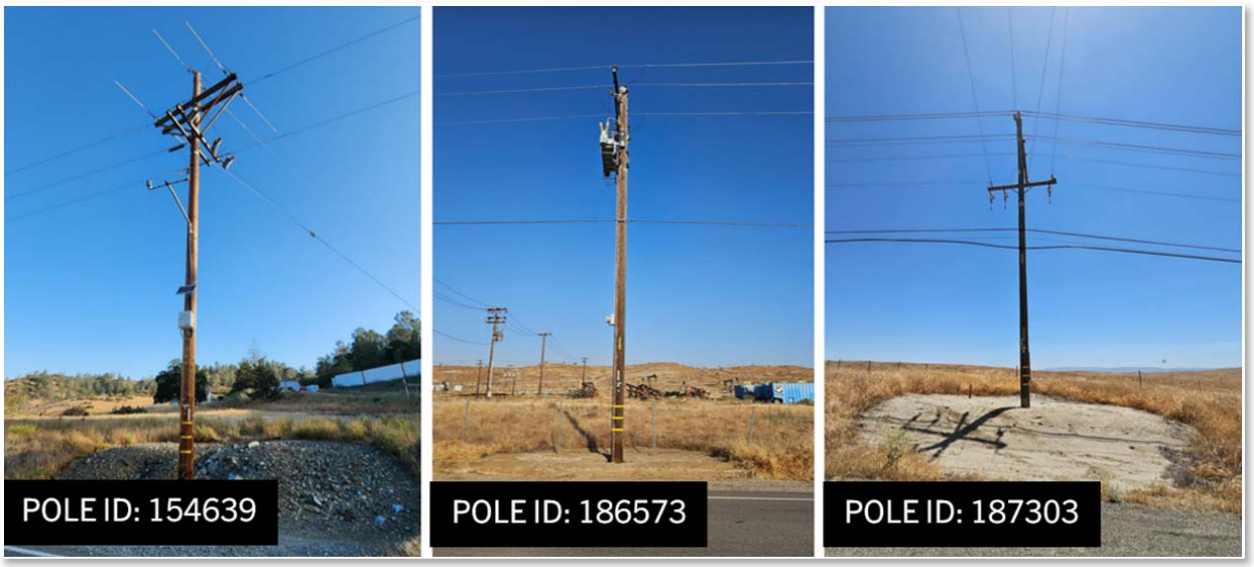

Figure 27: Example Pole Clearing in State Responsibility Areas Field Images

Using the information provided in the data request, the IE field verified a sample of 514 distribution structures in the State Responsibility Areas cleared in 2022. All 514 structures were found to comply with the initiative. Upon a thorough review of the data provided and the IE team's field verification samples, it appears likely that PG&E fulfilled its commitment of 80,208 distribution structures, a self-reported (99.94%) of the objective goal of 80,258 structures. Field assessments of the pole clearings were reviewed for workmanship quality, the accuracy of the information, and compliance with the initiative. Additionally, the IE team reviewed how PG&E selects, executes, closes, and tracks the overall Pole Clearing Program initiative and its various process flows and found them to align with the initiative description as described within the 2022 WMP. Field assessments of the pole clearings in State Responsibility Areas were reviewed for workmanship quality and accuracy of information. The following issues or data discrepancies were identified during the field assessment:

- The location of one (1) structure does not match the coordinates provided. The structure is located approximately 175 feet north of the coordinates.
- One structure was found with tree limbs within the area surrounding the pole, for a visual illustration of the pole, please refer below to Figure 28: Example Vegetation Debris Field Image.

Figure 28: Example Vegetation Debris Field Image

Summary of Initiative Findings

In addition to the Field Reviews conducted, the IE also reviewed satellite data and numerous relevant documents, such as WMP-specific initiative life cycle documentation, inspection and audit records, fire rebuild design and guidance standards, design as-builts, maps, and various planning documents along with process flows encompassing how PG&E selects, executes, closes and tracks specific initiatives. PG&E provided the documentation in confidentiality in response to the IE's various data requests. Table 3 summarizes the IE's findings of PG&E's program initiatives, as they were identified and reported as a part of this evaluation.

Table 3: Large Volume Quantifiable Goal/Target – Field Verifiable Summary Table

Program	Units	Sections	Sampling Methodology	PG&E Target	PG&E Actual	IE Field Sample Target	IE Field /Addl. Sample	Summary, Overview, and Review
Weather Stations -Installations and Optimizations	EA	7.3.2.1.3 - B.02	ANSI/ASQ Z1.4	100	111	20	20 Field/ 111 Data Output Reviews	Goal met/ exceeded 6/111 or (5.4%) Potentially non-operational at time of review
High-Definition Cameras - Installations	EA	7.3.2.1.4 - B.03	ANSI/ASQ Z1.4	98	100	20	100 Data Output Reviews	Goal met/ exceeded 1/100 or (1%) Potentially non-operational at time of review
Expulsion Fuse - Removal	EA	7.3.3.7 - C.01	ANSI/ASQ Z1.4	3,000	3,085	125	201	Goal met/ exceeded (Removals) 1 removal was found 400-feet from provided coordinates.
Distribution Sectionalizing Devices - Install and SCADA commission	EA	7.3.3.8.1 - C.02	ANSI/ASQ Z1.4	100	124	20	25	Goal met/ exceeded (Installations) 2 installations were found 165 to 175-feet from provided coordinates.
10K Undergrounding	Miles	7.3.3.16 - C.10	ANSI/ASQ Z1.4	175	179.7	32	34.17	Goal met/ exceeded (Undergrounding)
System Hardening - Distribution	Miles	7.3.3.17.1 - C.11	ANSI/ASQ Z1.4	470	483	50	51.26	Goal met/ exceeded
Surge Arrester - Removals	EA	7.3.3.17.3 - C.13	ANSI/ASQ Z1.4	4,590	4,621	200	200	Goal met (Removals) Cannot confirm exceeded amount of 31 units per the

								1% sampling discrepancy. 3 structures were found 134 to 200-ft from provided coordinates.
Enhanced Vegetation Management	Miles/ EA	7.3.5.2 - E.01	ANSI/ASQ Z1.4	1,800	1,923.80	125	177 Field/ 20 Satellite Reviews	Goal met/ exceeded 15 segment sites locations with residual debris
Pole Clearing Program	EA	7.3.5.2 - E.02	ANSI/ASQ Z1.4	7,000	8,356	200	201	Goal met/ exceeded 4 structures were found 75 to 200-feet from provided coordinates.
Utility Defensible Space - Distribution	EA	7.3.5.20 - E.09	ANSI/ASQ Z1.4	7,000	7,168	200	205	Goal met (UDS) Cannot confirm exceeded amount of 168 units per the 1.46% sampling discrepancy. 3 locations with residual debris within 50-ft buffer. 8 structures with moderate regrowth.
Pole Clearing - per PRC 4292 in State Responsibility Areas (SRA)	EA	7.3.5.2 - E.10	ANSI/ASQ Z1.4	80,258	80,208	500	514	Goal met/ exceeded 1 structure was found 175-ft from provided coordinates. 1 structure with residual debris.

3.1.2.2 Trends and Themes

Beneath is a distilled analysis of patterns and key themes pertinent to the appraisal of Section 3.1.2's Large Volume Quantifiable Goal/Target - Field Verifiable commitments. This wide-ranging assessment encompasses several aspects, such as verification of task completion, assessment of workmanship quality, compliance with relevant utility protocols, and observance of work-specific standards. Of equal importance is the credibility and precision of the data, which constitutes the foundation of the IE team's comprehensive review and answers to corroborative data requests. Additionally, the IE incorporated findings from previous years' performances to identify recurring trends, thus offering insights that extend beyond singular instances.

Quality of Data Received

Several notable advancements were seen in this year's data collection efforts, particularly in relation to the timeliness and quality of the data provided by PG&E to the IE team. In past years, we had to repeatedly request location information that was often not categorized by work type and lacked sufficient details to facilitate precise fielding without resorting to historical records such as as-built construction drawings. This year, however, marked a noticeable improvement. The data we received was systematically organized, significantly aiding our efforts and enhancing internal tracking.

Take, for instance, the Enhanced Vegetation Management spreadsheet provided to the IE team. It was not just a data dump but came with a comprehensive overview meeting on how to interpret the data and use the information effectively. This data contained extensive details, enabling us to draw connections between circuits, work classifications, and the volume of work conducted within each circuit, as well as the number of trees in each segment. The data was also structured in a way that facilitated seamless import into our ESRI geodatabase and allowed us to segment it into multiple categories. This ease of use and categorization significantly aided in formulating an efficient logistical plan, yielding optimal results.

This operational efficiency partially explains why we exceeded many of our IE targets. We discovered that enhanced logistical control increased efficiency in our field review outputs and summary conclusions. This trend was observed across most of the data we were provided, signifying a commendable improvement that merits acknowledgment.

Commitment Quantity Targets

The data gathered and analyzed for this evaluation - encompassing commitment targets and actuals reported by PG&E per the 2022 WMP's objectives and self-reported actuals - met and surpassed all targets except for Pole Clearing in State Responsibility Areas (SRA). Even when the IE team's findings, which frequently exceeded sampling targets and incorporated additional verification methods such as satellite data or IP address data streams for cameras and weather

stations, were used to validate all data streaming initiatives, the extrapolated findings did not alter the goal outcomes.

Workmanship, Data Outputs, and Infrastructure Location Accuracies

The IE observed fewer instances of incomplete work than in prior years, along with similar positional inaccuracies where locations strayed beyond a 75' threshold from provided coordinates; the vast majority, however, fell within normal GPS tolerances. Despite the substantial volume, we noted a significant uptick in vegetation work executed to the established initiative standards. However, in many cases, tree removals, trims, and overhang work resulted in debris left near the tree's original location, which are documented and depicted within the report. While we've noticed a marked improvement in workmanship across most infrastructure program initiatives, the exception remains the Weather Stations, with some stations remaining inactive for periods exceeding 30 days. Considering the enhancements in data provision, it's clear that workmanship improvements are linked to both accurate data provision to the IE and better program visibility through detailed tracking.

In summary, the major trends and themes observed include:

- Compliance with data requests, along with the quality of the furnished data, exhibited significant improvement over previous years, with assessments ranging from good to outstanding.
- The boost in logistical control, facilitated by the upgraded quality of the provided data, played a pivotal role in surpassing numerous IE objectives. This in turn amplified the efficiency and quantity of our field review processes, thereby elevating the effectiveness and accuracy of our resulting insights and conclusions.
- Of the 11 commitments that PG&E undertook, they successfully met and surpassed 10, only falling short on the objective of Pole Clearing - as per PRC 4292 in State Responsibility Areas (SRA). According to PG&E's self-reporting, they missed this target by a narrow margin of 50 distribution poles.
- Despite the substantial scope of the work undertaken, a significant increase was observed in compliance with initiative standards, particularly in vegetation management tasks. However, an issue was noted where debris from tree maintenance activities was left in close proximity to the original location of the tree.
- There were some positional inaccuracies, but the vast majority of locations fell within normal GPS tolerances.

3.1.3 Large Volume Quantifiable Goal/Target – Not Field Verifiable

3.1.3.1 Review of Initiatives

Pursuant to the Final IE Scope of Work for the Review of Compliance with 2022 WMP, PG&E provided a complete list of all 2022 WMP activities classified as Large Volume Quantifiable Goal/Target - Not Field Verifiable completed in 2022. The IE's review and evaluation of these initiatives were completed through data request documentation from PG&E completion of initiatives and publicly available documents, articles, and reports. These 2022 WMP activities identified within the Large Volume Not Field Verifiable list were reviewed and assessed within this section, and the findings are presented below for each initiative.

7.3.4.1 - D.01 - Detailed Inspections – Distribution

Section 7.3.4.1 (Detailed Inspections of Distribution Electric Lines and Equipment) of the WMP describes incorporating enhanced detailed inspection of overhead distribution assets to identify corrective work on or imminent failures of equipment that could create a fire ignition if left unresolved.

An initial data request was submitted for a spreadsheet listing completed inspections for the 398,184 detailed inspections of distribution lines and equipment. Once the IE reviewed the spreadsheet, a second request (DRU11575 D.01) was submitted requesting two hundred (200) Tier 2 and six hundred (600) Tier 3 inspection forms and photos using Mil Spec 105E, Table 11-A, Single Sampling Plans for Normal Inspection.

Based on the analysis performed of data collected in response to DRU11575 D.01, the following findings were observed:

Tier 2 Detailed Inspection – Distribution Poles (Overhead)

- 100% of OH Checklist forms completed
- Nineteen (19) or 9.5% of OH Checklist forms were missing Bar Code number

Tier 3 Detailed Inspection – Distribution Poles (Overhead)

- 100% of OH Checklist forms completed
- One hundred twenty-six (126) or 21% of OH Checklist forms were missing Bar Code number
- One (1) OH Checklist form had a different Bar Code number compared to the Bar Code in the provided photo

Based on the review of 7.3.4.1, the IE evaluates this initiative as compliant with the 2022 WMP, but with corrective actions to be taken in the QA/QC process to ensure Bar Code numbers are entered into the OH Checklist for tracking purposes.

Table 4: Detailed Inspections – Distribution Summary

Description	2022 Target	2022 WMP ARC Report	DRU11575 Response	Summary
Detailed Inspections - Distribution	396,000 Inspections	398,184 Inspections	398,184 Inspections	Target Met/Exceeded by 2,184 Inspections

7.3.4.2 - D.02 - Detailed Inspection Transmission – Ground

Section 7.3.4.2 of the WMP outlines the goals and procedures for proactively mitigating the risk of fire ignition by conducting detailed inspections of transmission electric lines and equipment. Data was collected from 425 pole inspection reports and then compared to the objectives outlined in Section 7.3.4.2 to determine if identified initiative goals of the WMP were met. The focus of this initiative is to complete detailed ground inspections on a minimum of 39,000 transmission structures in PG&E's asset registry as of January 1, 2022, located in High Fire-Threat District (HFTD) areas or High Fire-Risk Areas (HFRA), excluding any External Factors. This specific target aims to ensure the thorough assessment of a significant number of transmission structures within designated high-risk areas, contributing to the overall proactive risk mitigation efforts outlined in the WMP. Of these 450 inspection reports requested, 425 reports were made available for review. The absence of inspection reports for locations designated as attachments 1-25 and the presence of duplicative site information in several reports raise concerns about the completeness and accuracy of the data collected. These factors likely impact the quality of data available in the reports in order to assist prioritization based on risk and consequences outlined in the WMP.

It was observed that the photographic documentation accompanying items labeled as abnormal conditions or heavily damaged was inadequate, making it challenging to ascertain the actual condition. This lack of visual evidence raised concerns about the subjectivity in designating the severity of damage, as the terms light, moderate, and heavy damage were used more frequently than what could be deduced from the available photos. Inconsistencies were also noticed in vegetation callouts between certain reports, indicating a lack of uniformity in recording and reporting.

While the inspections are intended to provide a comprehensive assessment of transmission structures within designated high-risk areas, based on the analysis of the collected data, it is not evident that goals used for assessment outlined in the WMP were entirely met, therefore, the IE

evaluates this initiative as compliant with the 2022 WMP, but with corrective actions to be taken in the QA/QC process to ensure completeness and accuracy of the data collected.

Table 5: Detailed Inspections – Transmission – Ground Summary

Description	2022 Target	2022 WMP ARC Report	DRU11575 Response	Summary
Detailed Inspections – Transmission – Ground	39,000 Inspections	39,005 Inspections	39,005 Inspections	Target Met/Exceeded by 5 Inspections

7.3.4.2 - D.03 - Detailed Inspection Transmission – Climbing

Section 7.3.4.2 (Detailed Inspections of Transmission Electric Lines and Equipment) of the WMP describes enhanced detailed inspections of overhead transmission assets to proactively identify and treat pending failures of asset components which could create a fire ignition if left unresolved or allowed to "run in failure".

In addition to PG&E performing ground and aerial enhanced inspections, climbing inspections area also required for 500 kilovolt (kV) structures, which involve detailed, visual examinations of the assets with the use of inspection checklist (Overhead Checklist) that are in accordance with ETPM and FMEA.

An initial data request was submitted for a spreadsheet listing completed inspections for the 1,835 detailed inspection of transmission electric lines and equipment. Once the IE reviewed the provided spreadsheet, a second request (DRU11575 D.03) was submitted requesting thirty-one (31) Tier 2 and ninety-four (94) Tier 3 inspection forms and photos using Mil Spec 105E, Table 11-A, Single Sampling Plans for Normal Inspection.

Based on the analysis performed of data collected in response to DRU11575 D.03, the following findings were observed:

Tier 2 Detailed Inspection – Transmission Poles (Climbing)

- 100% of OH Checklist forms were completed fully

Tier 3 Detailed Inspection – Transmission Poles (Climbing)

- 100% of OH Checklist forms were completed fully

Based on the review of 7.3.4.2, the IE evaluates this initiative as compliant with the 2022 WMP.

Table 6: Detailed Inspections – Transmission – Climbing Summary

Description	2022 Target	2022 WMP ARC Report	DRU11575 Response	Summary
Detailed Inspections – Transmission – Climbing	1,800 Inspections	1,835 Inspections	1,835 Inspections	Target Met/Exceeded by 35 Inspections

7.3.4.2 - D.04 - Detailed Inspection Transmission – Aerial

Section 7.3.4.2 (Detailed Inspections of Transmission Electric Lines and Equipment) of the WMP describes enhanced detailed inspections of overhead transmission assets to proactively identify and treat pending failures of asset components which could create a fire ignition if left unresolved or allowed to "run in failure".

Enhanced inspections of transmission assets include at least two detailed inspection methods: ground and aerial. Ground inspections are covered in the IE's review for 7.3.4.2 D.02. This evaluation covers detailed aerial transmission inspections.

An initial data request was submitted for a spreadsheet listing completed inspections for the 39,004 detailed aerial inspection of transmission electric lines and equipment. Once the IE reviewed the provided spreadsheet, a second request (DRU11575 D.04) was submitted requesting one hundred twenty-five (125) Tier 2 and three hundred seventy-five (375) Tier 3 inspection forms and photos using Mil Spec 105E, Table 11-A, Single Sampling Plans for Normal Inspection.

Based on the analysis performed of data collected in response to DRU11575 D.04, the following findings were observed:

Tier 2 Detailed Inspection – Transmission Aerial

- One hundred twenty-five (125) OH Checklist forms were completed fully.
- Eleven (11) or 8.8% of the one hundred twenty-five Aerial OH Inspection forms identified moderate damage within a section of the asset, but the overall condition of the structure was evaluated as having no visual damage.
- Seven (7) or 5.6% of the one hundred twenty-five Aerial OH Inspection forms identified heavy damage within a section of the asset, but the overall condition of the structure was evaluated as having no visual damage.

Tier 3 Detailed Inspection – Transmission Aerial

- Three hundred seventy-five (375) OH Checklist forms were completed fully.

- Forty-two (42) or 11.2% of the three hundred seventy-five Aerial OH Inspection forms identified moderate damage within a section of the asset, but the overall condition of the structure was evaluated as having no visual damage.
- Eighteen (18) or 4.8% of the three hundred seventy-five Aerial OH Inspection forms identified heavy damage within a section of the asset, but the overall condition of the structure was evaluated as having no visual damage.

Based on the review of 7.3.4.2, the IE evaluates this initiative as compliant with the 2022 WMP, but with corrective actions to be taken in the QA/QC process to ensure description of damage is documented accurately in the report.

Table 7: Detailed Inspections – Transmission – Aerial Summary

Description	2022 Target	2022 WMP ARC Report	DRU11575 Response	Summary
Detailed Inspections – Transmission – Aerial	39,000 Inspections	39,004 Inspections	39,065 Inspections	Target Met/Exceeded by 65 Inspections

7.3.4.4 - D.05 - Infrared Inspections - Distribution

As described within the 2022 WMP, PG&E's target for this initiative was to complete infrared inspections on 9,000 circuit miles of distribution lines in HFTD or HFRA areas, barring external factors. Per PG&E's ARC for 2022 WMP Report Dated March 31, 2023, provided in DRU11694, PG&E reported the completion of 9,560 circuit miles of infrared inspections of distribution lines. As detailed within PG&E's confidential response to Data Request DRU11575, PG&E provided a list of infrared inspections completed for 9,560 circuit miles, as summarized below in Table 8. The IE reviewed a sample of inspection records for 200 circuit miles of infrared inspections. No issues were identified in the review of the documentation of the infrared inspections for distribution.

Table 8: Infrared Inspections – Distribution Summary

Description	2022 Target	2022 WMP ARC Report	DRU11575 Response	Summary
Infrared Inspections - Distribution	9,000 Circuit Miles	9,560 Circuit Miles	9,560 Circuit Miles	Target Met/Exceeded by 560 Circuit Miles

7.3.4.17 - D.10 - HFTD/HFRA Open Tag Reduction – Distribution

Section 7.3.4.17 (HFTD/HFRA Open Tag Reduction – Distribution) describes PG&E's target of closing 55,000 E maintenance tags by the end of 2022. Although PG&E did not meet their goal of 55,000 E tags, they did prioritize and complete 45,951 including higher priority A, B and F tags bringing the total to 58,275 tags completed.

An initial data request was submitted for a spreadsheet listing the 45,951 closed tags. Once the IE reviewed the spreadsheet, a second request (DRU11575 D.10) was submitted requesting one hundred twenty-five (125) Tier 2 and three hundred seventy-five (375) Tier 3 closed distribution tags using Mil Standard 105E, Table 11-A, Single Sampling Plans for Normal Inspection.

Based on the analysis performed of data collected in response to DRU11575 D.10, the following findings were observed:

Tier 2 Closed Tags – Distribution

- One hundred twenty–five (125) closed tags evaluated and confirmed as completed

Tier 3 Closed Tags – Distribution

- Three hundred seventy-five (375) closed tags evaluated and confirmed as completed

Based on the review of 7.3.4.17, and acknowledging that PG&E states they did not meet their goal/target, the IE evaluates this initiative as completed, but not compliant with the 2022 WMP.

Table 9: HFTD/HFRA Open Tag Reduction – Distribution Summary

Description	2022 Target	2022 WMP ARC Report	DRU11575 Response	Summary
HFTD/HFRA Open Tag Reduction – Distribution	55,000 Tags	45,951 Tags	45,951 Tags	Target Not Met

7.3.4.17 - D.11 - HFTD/HFRA Open Tag Reduction – Transmission

Section 7.3.4.17 (HFTD/HFRA Open Tag Reduction – Transmission) describes PG&E's target of closing 18,000 HFRA/HFTD transmission tags by the end of 2022. This target was exceeded and a total of 21,145 tags were closed.

An initial data request was submitted for a spreadsheet listing the 21,145 closed tags. Once the IE reviewed the spreadsheet, a second request (DRU11575 D.11) was submitted requesting seventy-nine (79) Tier 2 and two hundred thirty-six (236) Tier 3 closed transmission tags using Mil Standard 105E, Table 11-A, Single Sampling Plans for Normal Inspection.

Based on the analysis performed of data collected in response to DRU11575 D.11, the following findings were observed:

Tier 2 Closed Tags – Transmission

- Seventy-nine (79) Transmission OH Construction Completion Standard Checklist, Attachment D-1 forms completed.

Tier 3 Closed Tags – Transmission

- Out of Two hundred thirty-six (236) Tier 3 closed tags, only one hundred sixty (160) Transmission OH Construction Completion Standard Checklist, Attachment D-1 forms were provided.
- One hundred sixty (160) Transmission OH Construction Completion Standard Checklist, Attachment D-1 forms completed.
- Two (2) or 1.25% of OH Checklist had a different structure pole number compared to number on photograph.
- One (1) or 0.625% had pole number missing on OH Checklist form.

Based on the review of 7.3.4.17, the IE evaluates this initiative as compliant with the 2022 WMP, but with corrective actions to be taken in the QA/QC process to ensure pole numbers are entered into the OH Construction Completion Standard Checklist, Attachment D-1 form.

Table 10: HFTD/HFRA Open Tag Reduction – Transmission Summary

Description	2022 Target	2022 WMP ARC Report	DRU11575 Response	Summary
HFTD/HFRA Open Tag Reduction – Transmission	18,000 Tags	21,145 Tags	21,145 Tags	Target Met/Exceeded by 3,145 Tags

7.3.5.7 - E.03 - LiDAR Ground Inspections - Distribution

As described within the 2022 WMP, PG&E's target for this initiative was to complete 2,000 circuit miles of LiDAR capture on HFTD road access electric distribution lines, barring external factors. Per PG&E's ARC for 2022 WMP dated March 31, 2023, provided in DRU11694, PG&E reported completion of LiDAR capture for 3,358.66 circuit miles. As detailed within PG&E's confidential Response to Data Request DRU11578, PG&E provided a list of LiDAR inspections completed for 3,357.66 circuit miles as summarized below in Table 11.

The IE reviewed documentation provided by PG&E in Confidential Response to Data Request DRU11578 of findings that resulted from LiDAR ground inspections for distribution from a sample of circuits representing 200 circuit miles. No issues were identified in the review of the documentation for LiDAR ground inspections for distribution. The IE conducted a SME Interview with PG&E's Remote Sensing Program Manager Per Appendix D Item No. 1 which provided additional explanation of the LiDAR collection and reporting process that is used to document findings. In Confidential Response to Data Request 11578 PG&E provided screenshots of the LiDAR output from a sample finding.

Table 11: LiDAR Ground Inspections – Distribution Summary

Description	2022 Target	2022 WMP ARC Report	DRU11578 Response	Summary
LiDAR Ground Inspections - Distribution	2,000 Circuit Miles	3,358.66 Circuit Miles	3,357.66 Circuit Miles	Target Met/Exceeded by 1,357.66 Circuit Miles

Although there is a one (1) circuit mile difference between the totals for LiDAR ground inspections completed as reported in the ARC Report for the 2022 WMP and the documentation provided in DRU11578, since both totals exceed the target, the IE confirms that PG&E met the target for this initiative for 2022.

7.3.5.8 - E.04 - LiDAR Routine Inspections - Transmission

As described within the 2022 WMP, PG&E's target for this initiative was to complete the LiDAR inspection of 18,000 circuit miles of transmission lines by June 30, 2022, barring external factors. Per PG&E's ARC for 2022 WMP dated March 31, 2023, provided in DRU11694, PG&E reported that LiDAR inspections were completed on all transmission circuit miles for a total of 17,867. In the ARC Report, PG&E noted that the original target identified as 18,000 "circuit miles" was intended to have meant "line miles" per the Energy Safety definition, which accounts for the difference in the 2022 WMP Target and reported actual mileage for transmission circuits. This

discrepancy was originally identified and noted in PG&E's Quarterly Initiative Update (QIU) for the second quarter of 2022, dated August 1, 2022 (See Table 12 Summary below).

As detailed within PG&E's confidential Response to Data Request DRU11578, PG&E provided a list of LiDAR inspections for transmission circuits completed for 17,804 circuit miles from the LiDAR vendor's project management database, which equates to 17,867 circuit miles in PG&E's ETGIS system. PG&E provided a document clarifying the association between vendor-delivered mileage and PG&E ETGIS mileage and discussing the differences in geographic representation between the two systems, identifying that the difference is due principally to geometry differences and mapping of parallel circuits.

In response to the data request, PG&E confirmed that the circuit mileage from ETGIS is used for reporting purposes since it represents PG&E's asset data as summarized in Table 12 below. A sample of the records for 315 circuit miles of LiDAR routine transmission inspections from the project management database was reviewed by the IE. No issues were identified in the review of the documentation for LiDAR routine inspections for transmission.

Table 12: LiDAR Routine Inspections – Transmission Summary

Description	2022 Target[1]	2022 WMP ARC Report	DRU11578 Response	Summary
LiDAR Routine Inspections - Transmission	18,000 Circuit Miles	17,867 Line Miles	17,867 Circuit Miles	Target Met

[1] In the ARC Report, PG&E noted that the original target identified as 18,000 "circuit miles" was intended to have meant "line miles" per the Energy Safety definition, which accounts for the difference in the 2022 WMP Target and reported actual mileage for transmission circuits as noted in PG&E's Quarterly Initiative Update (QIU) for the second quarter of 2022, dated August 1, 2022.

7.3.5.13 - E.05 - Vegetation Management - Quality Assurance and Quality Verification

As described within the 2022 WMP, PG&E identified targets for vegetation management quality assurance and quality verification activities for seven (7) areas with two (2) components for each activity.

Quality Assurance Audits Distribution

As described within the 2022 WMP, PG&E planned to conduct 43 quality assurance audits for distribution vegetation management with an Acceptable Quality Level (AQL) of 95%. Per PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694, PG&E reported that 43 quality assurance audits for distribution were completed with an AQL of 98.2%. As detailed within

PG&E's confidential response to Data Request DRU11578, PG&E provided the list of 43 quality assurance audits conducted for distribution vegetation management. The IE reviewed a sample of 5 quality assurance audits for distribution vegetation management. The AQL of the sample of the reviewed audits was 99.69%. Based on the documentation provided and the IE's verification sample, data suggest that PG&E completed the activity and met the AQL target for this initiative.

Quality Assurance Audit Vegetation Pole Clearing

As described within the 2022 WMP, PG&E planned to conduct one quality assurance audit for vegetation pole clearing with an Acceptable Quality Level (AQL) of 95%. Per PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694, PG&E reported that one quality assurance audit for vegetation pole clearing was completed with an AQL of 98.2%. As detailed within PG&E's confidential response to Data Request DRU11578, PG&E provided the final report for the quality assurance audit for vegetation pole clearing, which identified a 98.2% pass rate for work quality conformance. Based on the documentation provided and the IE's verification, data suggest that PG&E completed the audits and met the AQL target for this initiative.

Quality Assurance Audit Transmission

As described within the 2022 WMP, PG&E planned to conduct one quality assurance audit for transmission vegetation management with an Acceptable Quality Level (AQL) of 95%. Per PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694, PG&E reported that one quality assurance audit for transmission vegetation management was completed with an AQL of 100%. As detailed within PG&E's confidential response to Data Request DRU11578, PG&E provided the final report for the quality assurance audit for transmission vegetation management, which identified a 100% pass rate for regulatory compliance and a 100% pass rate for contract compliance. Based on the documentation provided and the IE's verification, data suggest that PG&E completed the audit and met the AQL target for this initiative.

Quality Assurance Procedure Audits

As described within the 2022 WMP, PG&E planned to conduct four quality assurance procedure audits with an Acceptable Quality Level (AQL) of 95%. Per PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694, PG&E reported that four quality assurance procedure audits were completed with an AQL of 76%. As detailed within PG&E's confidential response to Data Request DRU11578, PG&E provided the final reports for the four (4) quality assurance procedure audits, which identified an overall 76% AQL rate. Based on the documentation provided and the IE's verification, data suggest that PG&E completed the audits and did not meet the AQL target for this initiative.

Quality Verification Reviews Distribution

As described within the 2022 WMP, PG&E planned to conduct 1,522 quality verification reviews for distribution vegetation management with an Acceptable Quality Level (AQL) of 95%. PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694, PG&E reported that 1,640 quality verification reviews for distribution vegetation management were completed with an AQL of 91.3%. As detailed within PG&E's confidential response to Data Request DRU11578, PG&E provided a list of 1,640 completed quality verification reviews for distribution vegetation management with an AQL of 91.3%. A SME interview with PG&E's Manager of Quality and Safety Support was conducted on June 14, 2023 to discuss the QVVM results and the determination of AQL percentages per Appendix D Item No. 2. Based on the documentation provided and the IE's verification sample, data suggest that PG&E completed the reviews and did not meet the AQL target for this initiative.

Quality Verification Reviews Vegetation Pole Clearing

As described within the 2022 WMP, PG&E planned to conduct 3,421 quality verification reviews for vegetation pole clearing with an Acceptable Quality Level (AQL) of 95%. PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694, PG&E reported that 3,469 quality verification reviews for vegetation pole clearing were completed with an AQL of 90.26%. As detailed within PG&E's confidential response to Data Request DRU11578, PG&E provided a list of 3,469 completed quality verification reviews for vegetation pole clearing with an AQL of 90.26%. A SME interview with PG&E's Manager of Quality and Safety Support was conducted on June 14, 2023 to discuss the QVVM results and the determination of AQL percentages per Appendix D Item No. 2. Based on the documentation provided and the IE's verification sample, data suggest that PG&E completed the reviews and did not meet the AQL target for this initiative.

Quality Verification Reviews Transmission

As described within the 2022 WMP, PG&E planned to conduct 260 quality verification reviews for distribution vegetation management with an Acceptable Quality Level (AQL) of 95%. PG&E's ARC for 2022 WMP dated March 31, 2023, provided in DRU11694, PG&E reported that 349 quality verification reviews for transmission vegetation management were completed with an AQL of 94.2%. As detailed within PG&E's confidential response to Data Request DRU11578, PG&E provided a list of 349 completed quality verification reviews for vegetation pole clearing with an AQL of 94.2%. A SME interview with PG&E's Manager of Quality and Safety Support was conducted on June 14, 2023 to discuss the QVVM results and the determination of AQL percentages per Appendix D Item No. 2. Based on the documentation provided and the IE's verification sample, data suggest that PG&E completed the reviews and did not meet the AQL target for this initiative.

Table 13: Vegetation Management - Quality Assurance and Quality Verification Summary

Description	2022 Target	2022 WMP ARC Report	DRU11578 Response	Summary
QA Audits Distribution	43 Audits 95% AQL	43 Audits 99.78% AQL	43 Audits 99.33% AQL	Audits Completed/ AQL Target Met
QA Audit Vegetation Pole Clearing	1 Audit 95% AQL	1 Audit 98.2% AQL	1 Audit 98.2% AQL	Audit Completed/ AQL Target Met
QA Audits Transmission	1 Audit 95% AQL	1 Audit 100% AQL	1 Audit 100% AQL	Audit Completed/ AQL Target Met
QA Procedure Audits	4 Audits 95% AQL	4 Audits 76% AQL	4 Audits 76% AQL	Audits Completed/ AQL Target Not Met
QV Reviews Distribution	1,522 Reviews 95% AQL	1,640 Reviews 91.3% AQL	1,640 Reviews 91.3% AQL	Reviews Completed/ AQL Target Not Met
QV Reviews Vegetation Pole Clearing	3,421 Reviews 95% AQL	3,469 Reviews 90.2% AQL	3,469 Reviews 90.2% AQL	Reviews Completed/ AQL Target Not Met
QV Reviews Transmission	260 Reviews 95% AQL	349 Reviews 94.2% AQL	349 Reviews 94.2% AQL	Reviews Completed/ AQL Target Not Met

As summarized in Table 13 above, the IE has confirmed that PG&E has completed the activities for the seven (7) areas of vegetation management quality assurance (QAVM) and quality verification (QVVM) described in PG&E's 2022 WMP. Although the IE confirmed that four (4) out of seven (7) of the areas did not meet the target set for AQL with all four (4) initiatives, these four (4) areas were self-reported by PG&E in the 2022 ARC Report dated March 31, 2022. Within the 2022 ARC , PG&E reported taking corrective actions for the QAVM Procedure Audits through a CAP "to memorialize this audit and give clarity into the correction action. As a result, multiple procedures and standards are being revised and/or updated." Additionally, the 2022 ARC Report also describes the Corrective Actions taken by PG&E for the QVVM areas that didn't meet the target AQL that includes identifying the reasons for the findings and implementing improvements to the work execution across the three (3) QVVM items.

7.3.5.17.1 - E.06 - Defensible Space Inspections - Distribution Substation

As described within the 2022 WMP, PG&E's target for this initiative was to complete defensible space inspections at 132 distribution substations within HFTD or HFRA areas barring external factors. Per PG&E's ARC for 2022 WMP dated March 31, 2023, provided in DRU11694, PG&E reported that defensible space inspections were completed for all 132 distribution substations. As detailed within PG&E's confidential Response to Data Request DRU11578, PG&E provided the

list of 132 completed defensible space inspections, as summarized below in Table 14. The IE reviewed a sample of 20 defensible space inspections. No issues were identified in the review of the defensible space inspections.

Table 14: Defensible Space Inspections - Distribution Substation Summary

Description	2022 Target	2022 WMP ARC Report	DRU11578 Response	Summary
Defensible Space Inspections	132 Inspections	132 Inspections	132 Inspections	Target Met

7.3.6.8 - F.02 - EPSS - Install Settings on Distribution Line Devices

As described within the 2022 WMP, PG&E's target for this initiative was to load engineered settings on protection line devices on 1,018 identified circuits, with 80 percent completed by May 1, 2022 and the remaining 20 percent completed by August 1, 2022. In the quarterly data reports, PG&E identified that the target for this initiative comprised 3,580 line reclosers and fuse savers. Per PG&E's ARC for 2022 WMP dated March 31, 2023, provided in DRU11694, PG&E reported having installed engineered settings on 3,580 distribution line devices on the 1,018 circuits in Q3 2022, subject to exclusions. Per PG&E's Q4 Quarterly Data Report (QDR) dated March 1, 2023, exclusions are defined as (1) protection devices that cannot receive the engineered settings due to repair status; (2) protection devices removed from service after March 10, 2022; and (3) circumstances arising from external factors. As detailed within PG&E's confidential Response to Data Request DRU11581, PG&E provided the list of line devices showing that 3,121 devices had EPSS settings enabled by May 1, 2022 and 3,580 had EPSS settings enabled by August 1, 2022 or were identified as exclusions summarized below in Table 15.

Table 15: Install Settings on Distribution Line Devices Summary

Description	2022 Target	2022 WMP ARC Report	DRU11581 Response	Summary
80 percent of line devices by May 1, 2022	2,864 Line Devices	Not stated	3,121 Line Devices	Target Met/Exceeded by 257 Line Devices
100 percent of line devices by August 1, 2022	3,580 Line Devices	3,580 Line Devices	3,580 Line Devices	Target Met

3.1.3.2 Trends and Themes

The following is an overview of the themes and trends extrapolated after reviewing the sections of 3.1.2 b. Large Volume Quantifiable Goal/Target– Not Field Verifiable. The interpretation incorporates various categories, including adherence to applicable utility protocols and standards for such work, along with assessments of the quality of the information provided to support our overall review.

For Section 7.3.4.1 – D.01 – Detailed Inspections – Distribution, the IE observed missing bar code information on the OH Checklist forms. One OH Checklist form had a different bar code compared to the photo attached to that inspection.

For Section 7.3.4.2 – D.02 – Detailed Inspection Transmission – Ground, the observed that the photographic documentation accompanying items labeled as abnormal conditions or heavily damaged was inadequate, making it challenging to ascertain the actual condition. This lack of visual evidence raised concerns about the subjectivity in designating the severity of damage, as the terms light, moderate, and heavy damage were used more frequently than what could be deduced from the available photos. Inconsistencies were also noticed in vegetation callouts between certain reports, indicating a lack of uniformity in recording and reporting.

The IE found no discrepancies while evaluating Section 7.3.4.2 – D.03 – Detailed Inspection Transmission – Climbing.

Section 7.3.4.2 – D.04 – Detailed Inspection of Transmission – Aerial found inconsistencies with the evaluation scoring regarding damage to the asset. 8.8% of Tier 2 and 11.2% of Tier 3 inspections reported moderate damage findings within a section of the asset, but the overall condition of that specific asset was scored as “No Visual Damage.” 5.6% of Tier 2 and 4.8% of Tier 3 inspections reported heavy damage within a section of the asset, but the overall condition of that specific asset was scored as “No Visual Damage.”

For Section 7.3.4.17 – D.10 – HFTD/HFRA Open Tag Reduction – Although PG&E states they did not reach their target, the IE found no discrepancies with the evaluation of documents provided for review.

For Section 7.3.4.17 – D.11 – HFTD/HFRA Open Tag Reduction – Transmission, the IE did not receive all documents specified in the data request. Regardless, an evaluation was performed, and the IE observed that one (1) or 1.25% of the submitted Transmission OH Construction Completion Standard Checklist, Attachment D-1 had discrepancies between pole number on the form compared to the pole number on the photo. One (1) or 0.625% of the submitted forms had a pole number missing on the OH Checklist form.

Quality of Data Received

For the large volume non-field verifiable initiatives, the IE took a similar rigorous and comprehensive approach to the requested information that was utilized for the large volume field verifiable initiatives. PG&E provided data and documentation for all initiatives with detailed information, identifying the work completed along with relevant details. Information was often provided with confidentiality requirements; however, they did not preclude the relevant information from being provided to assist in the evaluation efforts.

Through the review and evaluation of these WMP activities, PG&E's trend across the 2022 WMP activities identified within this section complies with the stated goals identified within the 2022 WMP unless otherwise identified herein, and PG&E continues to incorporate data-collected analytics, lessons learned, and technological assessments into the 2022 goals and future PG&E initiatives, with a summary of received documentation below in Figure 29 for the 12 initiatives in this category.

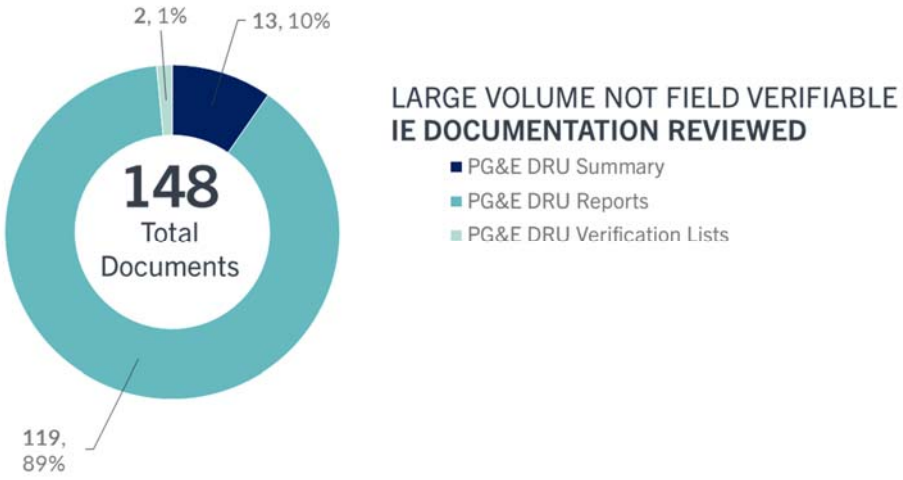

Figure 29: IE Documentation Reviewed for Large Volume – Not Field Verifiable

Per the IE Findings Summaries above, PG&E's WMP progress is summarized below in Table 16.

Table 16: Large Volume Quantifiable Goal/Target – Not Field Verifiable Summary Table

SOW Category	2022 Initiative Number	Initiative Name	Finding	Detail on Finding
WMP Activity Completion	7.3.4.1 - D.01	Detailed Inspections - Distribution	Activity completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.4.2 - D.02	Detailed Inspection Transmission – Ground	Activity completed	Compliant with the 2022 WMP

WMP Activity Completion	7.3.4.2 - D.03	Detailed Inspection Transmission – Climbing	Activity completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.4.2 - D.04	Detailed Inspection Transmission – Aerial	Activity completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.4.4 - D.05	Infrared Inspections - Distribution	Activity completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.4.17 - D.10	HFTD/HFRA Open Tag Reduction - Distribution	Activity not completed	Not Compliant with the 2022 WMP
WMP Activity Completion	7.3.4.17 - D.11	HFTD/HFRA Open Tag Reduction - Transmission	Activity completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.5.7 - E.03	LiDAR Ground Inspections - Distribution	Activity completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.5.8 - E.04	LiDAR Routine Inspections - Transmission	Activity completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.5.13 - E.05	Vegetation Management - Quality Assurance and Quality Verification	Activity completed	Not Compliant with the 2022 WMP
WMP Activity Completion	7.3.5.17.1 - E.06	Defensible Space Inspections - Distribution Substation	Activity completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.6.8 - F.02	EPSS - Install Settings on Distribution Line devices	Activity completed	Compliant with the 2022 WMP

3.1.4 Small (less than 100 times) Volume Quantifiable Goal/Target

3.1.4.1 Review of Initiatives

Pursuant to the Final IE Scope of Work for the Review of Compliance with 2022 WMP, PG&E provided a complete list of all 2022 WMP activities classified as Small (Less than 100 units) Volume Quantifiable Goal/Target that were conducted in 2022. These 2022 WMP activities identified within the Small Volume list were assessed in this section and presented below by each initiative.

7.3.2.2.3 - B.04 - Distribution Fault Anticipation (DFA) – Installations

Section 7.3.2.2.3 (Distribution Fault Anticipation (DFA) Installations) describes the utilization of DFA and EFD technology, which measures different electrical parameters over the distribution circuits.

As described within the 2022 WMP, PG&E's target for this initiative was to install 40 Distribution Fault Anticipation (DFA) sensors on circuits feeding into HFTD or HFRA areas. Per PG&E's ARC for

2022 WMP dated March 31, 2023, provided in DRU11694, PG&E reported that DFA sensors were installed on 48 circuits. As detailed within PG&E's confidential response to Data Request DRU11568, PG&E provided a list of 48 DFA sensors installed and reports documenting the installation and operation of the DFA sensors by quarter as summarized below in Table 17.

Table 17: B.04 - Distribution Fault Anticipation (DFA) – Installations Summary

Description	2022 Target	2022 WMP ARC Report	DRU11568 Response	Summary
Distribution Fault Anticipation (DFA) – Installations	40 DFA Sensors	48 DFA Sensors	48 DFA Sensors	Target Met/Exceeded By 8 DFA Sensors

7.3.2.2.3 - B.05 - Early Fault Detection (EFD) - Installations

Section 7.3.2.2.3 (Distribution Fault Anticipation (DFA) Installations) describes the utilization of DFA and EFD technology, which measures different electrical parameters over the distribution circuits.

As described within the 2022 WMP, PG&E's target for this initiative was to install EFD sensors on two (2) circuits feeding HFTD or HFRA areas. Per PG&E's ARC for 2022 WMP dated March 31, 2023, provided in DRU11694, PG&E reported installations of EFD sensors were completed on two (2) circuits. As detailed in PG&E's confidential response to Data Request DRU11570, PG&E provided a list of EFD sensors installed on two circuits including work order information documenting the installation as summarized below in Table 18.

Table 18: B.05 - Early Fault Detection (EFD) - Installations Summary

Description	2022 Target	2022 WMP ARC Report	DRU11570 Response	Summary
Early Fault Detection (EFD) - Installations	2 Circuits	2 Circuits	2 Circuits	Target Met

7.3.2.2.5 - B.06 - Line Sensor - Installations

Section 7.3.2.2.5 (Line Sensors – Installation) describes advanced monitoring methods to measure different electrical parameters over the distribution circuit to observe conditions early in their degradation mode.

As described within the 2022 WMP, PG&E's target for this initiative was to install line sensor devices on 40 circuits feeding into HFTD or HFRA areas. Per PG&E's ARC for 2022 WMP dated

March 31, 2023, provided in DRU11694, PG&E reported line sensor installation completed on 63 circuits. As detailed within PG&E's confidential response to Data Request DRU11571, PG&E provided a list of 63 circuits where line sensors were installed at 300 locations including job packages and work reports as documented below in Table 19.

Table 19: B.06 - Line Sensor - Installations Summary

Description	2022 Target	2022 WMP ARC Report	DRU11571 Response	Summary
Line Sensor - Installations	40 Circuits	63 Circuits	63 Circuits	Target Met/Exceeded by 23 Circuits

7.3.3.8.2 - C.03 - Transmission Line Sectionalizing - Install and SCADA Commission

Section 7.3.3.8.2 (Transmission Line Sectionalizing) describes PG&E's goal of installing remote-operated SCADA sectionalizing devices on their transmission system to support the ability to segment transmission circuits traversing HFTD areas.

As described within the 2022 WMP, PG&E's target for this initiative was to install and SCADA commission 15 transmission line switches on lines that traverse HFTD areas. Per PG&E's ARC for 2022 WMP dated March 31, 2023, provided in DRU 11694, PG&E reported installation and SCADA commissioning of 18 transmission line switches. Per confidential response to Data Request DRU11572, PG&E provided a list of 18 transmission line switches installed in 2022 as summarized below in Table 20. In subsequent response to data request DRU11572 PG&E provided SCADA release letters for the 18 transmission line switches. The IE reviewed the location data provided for each of the switches and confirmed that they were installed on circuits that traverse HFTD areas.

Table 20: C.03 - Transmission Line Sectionalizing - Install and SCADA Commission Summary

Description	2022 Target	2022 WMP ARC Report	DRU11572 Response	Summary
Transmission Line Sectionalizing – Install and SCADA Commission	15 Switches	18 Switches	18 Switches	Target Met/Exceeded by 3 Switches

7.3.3.8.3 - C.04 - Distribution Line Motorized Switch Operator (MSO) - Replacements

Section 7.3.3.8.3 of the WMP outlines the Distribution Line MSO Program, which aims to mitigate the ignition risk caused by equipment transformers and reduce the reliability impacts caused by PSPS. Data request DRU11572 – C.04 was sent to analyze if the Distribution Line MSO Program is consistent with the goals and objectives outlined in Section 7.3.3.8.3 of the 2022 WMP. An initial data request was submitted for a spreadsheet listing all MSO replacement locations. A second data request (DRU11572) was made for all documents and photos for each installation.

The data collected in response to data request DRU11572 – C.04 included a spreadsheet that contained numerical values associated with each location, the region of each location, and a designation of HFTD Tier. There were a total of 57 MSOs included in the spreadsheet, with 49 of the locations identified as Non-HFTD, 7 identified as Tier 2, and a single location identified in Tier 3. In a subsequent data request, the IE requested installation documentation and photos for 13 Motorized Switch Operators in various HFTD areas per Mil-Std 105E in order to confirm initiative targets for MSO replacement. Installation reports and photos were provided for the initiative analysis through a data request response upload.

Based on the analysis of the data collected in response to data request DRU11572 – C.04, the PG&E provided OH Construction Complete Standard Checklist A-2 along with SCADA testing and inspection completion records and photos provide clear documentation to conclude that the goals and objectives outlined in Section 7.3.3.8.3 of the 2022 WMP have been fully met.

Table 21: C.04 - Distribution Line Motorized Switch Operator (MSO) - Replacements Summary

Description	2022 Target	2022 WMP ARC Report	DRU11572 Response	Summary
Distribution Line Mortorized Switch Operator (MSO) - Replacements	50 Motorized Switch Operators	57 Motorized Switch Operators	57 Motorized Switch Operators	Target Met/Compliant with the 2022 WMP

7.3.3.9.1 - C.05 - SCADA Recloser Equipment - Installations

Section 7.3.3.9.1 of the WMP describes an initiative to reduce the frequency of ignition events caused by high impedance faults by installing new SCADA reclosers with enhanced high impedance fault detection and communication protocols, protection setting groups, and single-phase metering. The initiative aims to install SCADA reclosers just outside substations serving Tier 2 and 3 HFTD areas in 2022. As described within the 2022 WMP, PG&E's target for this initiative was to install 17 substation SCADA-enabled reclosers installed on circuits serving line sections that feed into HFTD areas or HFRA.

An initial data request was submitted for a spreadsheet listing all SCADA recloser installations. A subsequent second data request (DRU11572 – C.05) was made for documents and photos for each installation. According to the analysis of the data collected, only a spreadsheet was provided in response to data request DRU11572 – C.05, which contained numerical values, regions, and HFTD tier designations of 17 installed reclosers. The 17 locations were spread among 4 regions with 13 of the locations identified as Tier 2 and four (4) locations identified in Tier 3 HFTD areas. With the corresponding documentation provided in the DRU11572 response, the IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section as summarized in Table 22.

Table 22: C.05 - SCADA Recloser Equipment - Installations Summary

Description	2022 Target	2022 WMP ARC Report	DRU11572 Response	Summary
SCADA Recloser Equipment - Installations	17 Reclosers	17 Reclosers	17 Reclosers	Target Met

7.3.3.9.2 - C.06 - Fuse Savers (Single Phase Reclosers) – Installations

Section 7.3.3.9.2 (Fuse Savers) describes utilizing single phase reclosers as a replacement for fuses and can act as a single phase recloser with the capability to trip all phases, reducing the risk of a down wire remaining energized. As described within the 2022 WMP, PG&E's target for this initiative was to install 80 single phase recloser sets in HFTD or HFRA areas.

An initial data request was submitted for a spreadsheet listing all fuse savers installed. A subsequent second data request (DRU11572 – C.06) was made for all documents and photos for each installation.

The data collected for the installed fuse saver sets in response to data request DRU11572 – C.06 appears to fully meet the goals outlined in Section 7.3.3.9.2 of the WMP. The WMP emphasizes

the importance of mitigating ignition risks and improving reliability by replacing fuses with intelligent devices that can trip all phases in the event of a fault, reducing the risk of back-feed and energized downed wires. The initiative includes criteria for prioritizing installations in high-risk areas, such as HFTD areas and HFRA.

The spreadsheet indicates that 68 of the 81 locations identified were Tier 2 HFTD areas, and 13 locations were identified as Tier 3HFTD areas, which suggests that the installations were prioritized in high-risk areas. The installation documents received in response to the second data request included installation as-built fact sheets, Form 48 and SCADA testing documents and photos for the 13 MSO switch replacements as selected per MilStd 105E.

In conclusion, the data collected for the installed fuse saver sets fully meets the goals outlined in Section 7.3.3.9.2 of the WMP.

Table 23: C.06 - Fuse Savers (Single Phase Reclosers) – Installations Summary

Description	2022 Target	2022 WMP ARC Report	DRU11572 Response	Summary
Fuse Savers (Single Phase Reclosers) – Installations	80 Fuse Savers	81 Fuse Savers	81 Fuse Savers	Target Met/Compliant with the 2022 WMP

7.3.3.11.1 - C.07 - Temporary Distribution Microgrids

As described within the 2022 WMP dated July 26, 2022, PG&E committed to making "operationally-ready at least four additional Distribution Microgrid Pre installed Interconnection Hubs (PIH). This target will include one PIH that completed construction in December 2021 and will be made ready to operate in 2022" (page 507). PG&E's response within DRU11572 provided confidential completion records for the four Microgrid PIH installation packages.

PG&E supplied a PDF named Colfax Completed Job Package, which was a 135-page document containing three sheets of plans (updated June 6, 2021), a report (dated December 4, 2020), and 97 photos (not dated). The report appeared to have been originally dated December 4, 2020, with additional notes detailing 1484 man-hours dated December 5, 2021, and a print date shown of October 18, 2021. The report noted a completion target of June 1, 2021 for the location described as [redacted]. Additional checklists included document various activities in 2021, including 22 overhead pole and/or hardware installations, and 10 pad-mounted equipment installations. The photos appeared to match the general types of equipment noted in the plans and checklists.

Additionally, PG&E supplied three documents similar to the one described at [redacted] in the response. These documents included a 120-page document at [redacted] dated December 3, 2020 to April 21, 2022, documenting 614 man-hours, a 120-page document at [redacted] dated January 9, 2020 to December 7, 2022, documenting 614 man-hours, and [redacted] dated November 20, 2020 to December 10, 2022, documented 10 pages of Bill of Materials. A document titled Distribution Microgrid Pre-Installed Interconnection Hubs contained the names of the four locations showing that they were located in 2 regions and were bordering Tier 2 (2), in Tier 2 (1), and in Tier 3 (1) HFTD.

Per PG&E's Q4 QDR PGE-2022-Q4-QDR-20230201.xlsx Table 1 and PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694 (page 25), the target was completed in Q4. With the corresponding documentation provided in the DRU11572 response, the IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section as summarized in Table 24.

Table 24: C.07 – Temporary Distribution Microgrids Summary

Description	2022 Target	2022 WMP ARC Report	DRU11572 Response	Summary
Make operationally ready at least four (4) additional Distribution Microgrid Pre-installed Interconnection Hubs (PIHs)	4 PIHs	4 PIHs	4 PIHs	Target Met

7.3.3.11.2 - C.08 - Rincon Transformer Fuse - Replacement

As described within the 2022 WMP dated July 26, 2022, PG&E committed to replacing “the fuse with a circuit switcher on the Rincon Transformer Bank 1” (page 518). PG&E's response within DRU11572 provided confidential installation documentation for the Rincon Transformer Bank circuit switcher. Although no photos of the Rincon circuit switcher installation were provided in DRU11572, ten sheets of as-built plans were provided, which included an ATS schematic diagram and diagrams including Ckt SWR 176 SCADA Relay, Reclosing Relay, and SCADA Controls. Other sheets showed information including relay cut-outs, trip positions, contact quantities, and breaker control relay functions. All plans were dated January 19, 2021 as "Approved for Construction" and June 22, 2022 for "Revised per As-Built."

Although photos or installation reports were not available to confirm the installation, the 2022 WMP outlines plans beyond 2022 to review future PSPS Lookback updates to identify new areas

in need of additional study or mitigation and to review and replace additional transformer high-side fuses with circuit breakers or circuit switches.

Per PG&E's Q4 QDR PGE-2022-Q4-QDR-20230201.xlsx Table 1 and PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694 (page 25), the target was completed in Q2. With the corresponding documentation provided in the DRU11572 response, the IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section as summarized in Table 25.

Table 25: C.08 - Rincon Transformer Fuse - Replacement Summary

Description	2022 Target	2022 WMP ARC Report	DRU11572 Response	Summary
Replace the fuse with a circuit switcher on the Rincon Transformer Bank 1.	1 Fuse	1 Fuse	1 Fuse	Target Met

7.3.3.11.3 - C.09 - Emergency Back-up Generation – Equip PG&E Service Centers & Materials Distribution Centers

As described within the 2022 WMP dated July 26, 2022, PG&E committed to equipping "Equip 15 PG&E Service Centers or Materials Distribution Centers sites with emergency backup generation to allow the sites to operate with the same amount of functionality as they would if they were being fed from their normal utility power source" (page 520). PG&E's response within DRU11572 provided commissioning reports for all 15 sites, 16 photos of electrical equipment with corresponding file names to match the commissioning report locations, two (2) notices of completion, and a Utility Standard document. Furthermore, copies of final/substantial completion notices from contractors were provided for the two sites commissioned in December 2021.

Upon closer inspection, it was found that four sites did not note any generators in their commissioning reports and did not show any generators in their associated photos. In addition, two sites indicated a different number of generators from what was observed in the photos, with one location showing one less generator in the photo and another location appearing to show a second nearby site with an additional generator. However, all documentation confirmed that it was from 2022, and two locations that were noted as commissioned in December 2021 were verified with a letter of completion to have completed installation in 2022.

Although discrepancies were found in the reports and photos for some of the sites, the generators were found to be in close proximity to Tier 2 and/or Tier 3 HFTD zones. While only six

of the 15 location photos contained geo location to confirm the city matching the reports, all reports contained addresses that could be viewed in the CPUC HFTD GIS. It was found that no locations were in an HFTD, but seven of the locations were within approximately one mile or less of Tier 2 and/or Tier 3 HFTD, while the other eight locations were approximately two to 15 miles from Tier 2 and/or Tier 3 HFTD.

Per PG&E's Q4 QDR PGE-2022-Q4-QDR-20230201.xlsx Table 1 and PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694 (page 25), the target was completed in Q4. With the corresponding documentation provided in the DRU11572 response, the IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section as summarized in Table 26.

Table 26: C.09 - Emergency Back-up Generation – Equip PG&E Service Centers & Materials Distribution Centers Summary

Description	2022 Target	2022 WMP ARC Report	DRU11572 Response	Summary
Equip 15 PG&E Service Centers or Materials Distribution Centers sites with emergency back-up generation	15 Sites	15 Sites	15 Sites	Target Met

7.3.3.17.2 - C.12 - System Hardening - Transmission

As described within the 2022 WMP dated July 26, 2022, PG&E committed to "Remove or replace 32 circuit miles of transmission conductor on lines traversing the HFTD areas or HFRA." Per PG&E's Q4 Quarterly Data Report (QDR) PGE-2022-Q4-QDR-20230201.xlsx Table 1 and PG&E's ARC for 2022 WMP dated March 31, 2023, provided in DRU11694, PG&E reported the completion of 37.8 miles.

PG&E's confidential response within DRU11572 provided the list of replaced and removed miles with corresponding circuit names and HFTD designation of Tier 2 or Tier 3 for the conductor in confidential attachment DRU11572_Q012_Atch01_2022_WMP_System_Hardening_Work_Tracker_CONF as summarized in Table 27. The confidential as-builts confirmed the replacement or removal of conductor and associated asset hardware on structures with redlines or additional notes. The reviewed documents included engineering and project drawings, inspection reports, and project-related emails. The confidential response also clarified that on the Trinity-Cottonwood 115KV PH. 3 line, six (6) miles of conductor, were installed in December 2021, and the final span, with a distance of 0.22 miles, was installed in December 2022. PG&E reported a total of 6.22 miles as complete in December 2022. The Final in Service

Dates (FISD) from the reviewed documentation was also clarified in the response, and the IE believes the clarifications are reasonable.

Table 27: C.12 - System Hardening - Transmission Summary

Description	2022 Target	2022 WMP ARC Report	DRU11572 Response	Summary
Remove or Replace Transmission Conductor	32.6 Circuit Miles	37.8 Circuit Miles	37.8 Circuit Miles	Goal Met/Exceeded Target by 0.2 Circuit Miles

It should be noted that confidential attachment DRU11572_Q012_Atch07_2022_WMP_C.12_SH_Transmission_Define_CONF indicates under "Unit Completion Definition" that PG&E will remove 22 miles and replace 10.58 miles (which combines to 32.58 miles).

The IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section.

7.3.3.17.5 - C.14 - Remote Grid - Operate New SPS Units

As described within the 2022 WMP dated July 26, 2022, PG&E committed to operating "2 new Remote Grid Standalone Power System (SPS) units" (page 670). PG&E's response within DRU11572 provided 15 documents from two (2) responses related to the Remote Grid Program.

As-built plans for the Remote Microgrid Design were provided for each location, indicating the location of the Microgrid site and the construction of a private access road.

Commissioning reports were provided for both sites, including documentation of testing and commissioning for equipment at each site, such as a relay, CT's, ground grid, a station battery, Solar IV Curve evaluation, and operational verification. Testing was shown to be performed in late 2022 for both locations with no issues documented. Load test reports contained ESS battery storage (BESS) and inverter test documentation for each site. Testing results at both sites indicated ESS 85% testing exceeded 85% of nameplate rating at each site, and inverter results referenced FAT reports for applicable data.

Photos were included for both sites, although they were not timestamped or embedded with location data. The documents showed a date of December 2022.

Per PG&E's Q4 QDR PGE-2022-Q4-QDR-20230201.xlsx Table 1 and PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694 (page 26), the target was completed in Q4. With the corresponding documentation provided in the DRU11572 response, the IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section as summarized in Table 28.

Table 28: C.14 - Remote Grid - Operate New SPS Units Summary

Description	2022 Target	2022 WMP ARC Report	DRU11572 Response	Summary
2 new remote grid SPS units	2 Remote Grids	2 Remote Grids	2 Remote Grids	Target Met

7.3.3.17.6 - C.15 - Butte County Rebuild – Undergrounding

In continuation of the underground rebuilding efforts started in 2020 within Butte County for the Town of Paradise, PG&E committed to "Complete 55 circuit miles of undergrounding work as part of the Butte County Rebuild program" as described in the 2022 WMP dated July 26, 2022 (page 612).

Per PG&E's Q4 QDR PGE-2022-Q4-QDR-20230201.xlsx Table 1 and PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694 (page 27), PG&E reported the completion of 57.8 circuit miles. The 2023 WMP states, "Of the undergrounding miles completed in 2022, approximately 60 of those miles were completed as part of the Butte County Rebuild Program that covers the Town of Paradise and lower Magalia." Therefore, the exact number of primary circuit miles completed in 2022 is not explicitly stated in the 2023 WMP.

PG&E provided as-built documentation and field quality audit inspection reports relating to completing the corresponding 57.8 circuit miles within the confidential list provided in DRU11572. Additionally, news outlets reported on the underground activity, including the Action News Now article with video interviews describing the underground work in Butte County, shown in Figure 30.

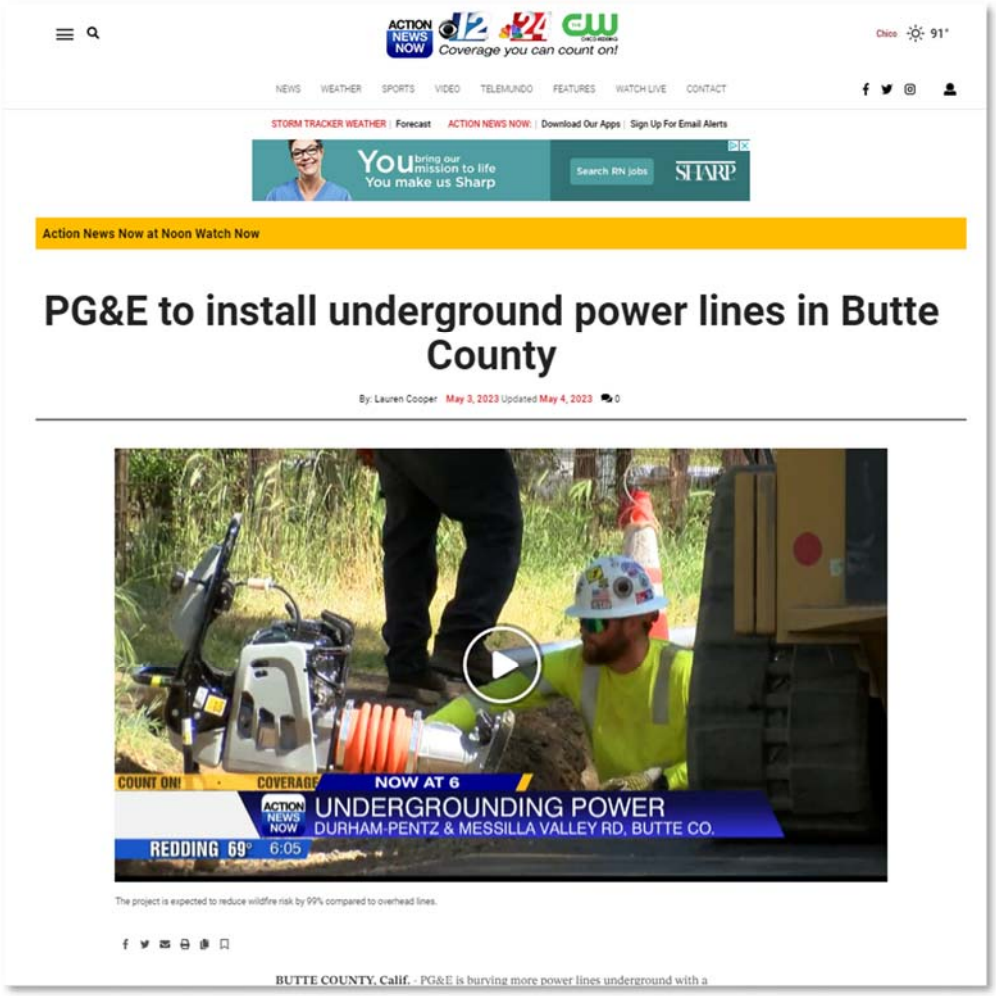

Figure 30: Action News Now article regarding PG&E undergrounding in Butte County (Appendix B Item No. 5)

In the table labeled Validation Phase of DRU11572_Q015_Atch05_2022 WMP-C.15-ButteCountyUG_Final-Define_CONF, PG&E indicates the following: "Butte Rebuild team finished 23 Mainline and 17 short main projects, accumulating 57.8 miles in total, which exceeds 55 miles commitment for the year 2022."

With the corresponding provided redlined as-built drawings, field quality audit inspection reports, and underground miles summary by project name, circuit feet, location, and HFTD designation provided with the confidential DRU11572 documents, the IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section as summarized in Table 29.

Table 29: C.15 - Butte County Rebuild - Undergrounding Summary

Description	2022 Target	2022 WMP ARC Report	DRU11572 Response	Summary
Complete Undergrounding work	55 Primary Circuit Miles	57.8 Primary Circuit Miles	57.8 Primary Circuit Miles	Goal Met/Exceeded Target by 2.8 Circuit Miles

7.3.4.15 - D.06 - Supplemental Inspections - Substation Distribution

As described within the 2022 WMP dated July 26, 2022, PG&E committed to completing "supplemental inspections on 86 distribution substations in HFTD areas or HFRA, barring External Factors" (page 670). PG&E's response within DRU11575 provided completed inspections for the eighty-six (86) supplemental distribution substation inspections located within the HFTD/HFRA. Of the eighty-six (86) inspections included in DRU11575, thirteen (13) inspections were evaluated using Mil Spec 105E, Table II-A, Single Sampling Plans for Normal Inspection. Of the thirteen substations evaluated, nine (9) are in Tier 3 and four (4) are in Tier 2.

Additionally, the following findings were observed:

- Four (4) substation inspection forms identified corrective actions within the substations ranging from standing water in the substation, vegetation around poles, cracked pole, and missing Jolly Ball. Instructions on Substation Form 2 details steps to document priority codes (A, B, & E) for the issues found. Although the inspectors documented corrective actions, they did not document on the substation form the priority code for the issue observed.
- Nine (9) substation inspection forms identified no corrective actions.

Per PG&E's Q4 QDR PGE-2022-Q4-QDR-20230201.xlsx Table 1 and PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694 (page 29), the target was completed in Q2. With the corresponding inspection documentation provided in the DRU11575 response, the IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section as summarized in Table 30.

Table 30: D.06 - Supplemental Inspections - Substation Distribution Summary

Description	2022 Target	2022 WMP ARC Report	DRU115XX Response	Summary
Supplemental inspections on transmission substations within HFTD areas or HFRA	86 Distribution Substations	86 Distribution Substations	86 Distribution Substations	Target Met

7.3.4.15 - D.07 - Supplemental Inspections - Substation Transmission

As described within the 2022 WMP dated July 26, 2022, PG&E committed to completing "supplemental inspections on 43 transmission substations within HFTD areas or HFRA, barring External Factors" (page 670). PG&E's response within DRU11575 provided inspection documentation for the forty-three (43) supplemental transmission substations located within the HFTD/HFRA. Of the forty-three (43) inspections included in DRU11575, eight (8) inspections were evaluated using Mil Spec 105E, Table II-A, Single Sampling Plans for Normal Inspection. Of the eight (8) substations evaluated, three (3) are in Tier 3 and five (5) are in Tier 2.Addtionally, the following findings were observed:

- Four (4) substation inspection forms identified corrective actions within the substations ranging from active alarms, open fence, animal abatement, improper ground and missing bonding, bridging, ground wire in poor condition. Instructions on Substation Form 2 details steps to document priority codes (A, B, & E) for the issues found. Although the inspectors documented corrective actions, they did not document on the substation form the priority code for the issue observed.
- Four (4) substation inspection forms identified no corrective actions.

Per PG&E's Q4 QDR PGE-2022-Q4-QDR-20230201.xlsx Table 1 and PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694 (page 29), the target was completed in Q2. With the corresponding inspection documentation provided in the DRU11575 response, the IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section as summarized in Table 31.

Table 31: D.07 - Supplemental Inspections - Substation Transmission Summary

Description	2022 Target	2022 WMP ARC Report	DRU11575 Response	Summary
Supplemental inspections on transmission substations within HFTD areas or HFRA	43 Transmission Substations	43 Transmission Substations	43 Transmission Substations	Target Met

7.3.4.16 - D.08 - Supplemental Inspections - Hydroelectric Substations and Powerhouses

As described within the 2022 WMP dated July 26, 2022, PG&E committed to completing "supplemental inspections on 52 Hydroelectric Generation Substations and Powerhouses within HFTD areas or HFRA, barring External Factors" (page 674). PG&E's response within DRU11575 provided inspection documentation for all fifty-two (52) Hydroelectric Generation Substations and Powerhouses located within the HFTD/HFRA. Of the fifty-two (52) substations evaluated, fifteen (15) are in Tier 3 and thirty-seven (37) are in Tier 2. Based on the inspection forms and photos provided in DRU11575, the following findings were observed:

- Fifteen (15), or 28.8% of the inspection forms submitted had no information documented or photos provided.
- One (1) file number had a different inspection number on the inspection form.
- Sixteen (16) substation inspection forms identified issues within the substation ranging from active alarms to no DC power. Instructions on the Substation Form details steps to document priority codes (A, B & E) for the issues found. Inspectors for all sixteen (16) substations did not document on the substation form the priority code for the issue observed.

Per PG&E's Q4 QDR PGE-2022-Q4-QDR-20230201.xlsx Table 1 and PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694 (page 29), the target was completed in Q2. With the corresponding inspection documentation provided in the DRU11575 response, the IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section as summarized in Table 32.

Table 32: D.08 - Supplemental Inspections - Hydroelectric Substations and Powerhouses Summary

Description	2022 Target	2022 WMP ARC Report	DRU11575 Response	Summary
Supplemental inspections on Hydroelectric Generation Substations and Powerhouses within HFTD areas or HFRA	52 Hydroelectric Generations Substations and Powerhouses	52 Hydroelectric Generations Substations and Powerhouses	52 Hydroelectric Generations Substations and Powerhouses	Target Met

7.3.5.17.2 - E.07 - Defensible Space Inspections - Transmission Substation

As described within the 2022 WMP dated July 26, 2022, PG&E committed to "Complete defensible space inspections in alignment with the guidelines set forth in PRC 4291 at 55 transmission substations within HFTD areas or HFRA, barring External Factors" (page 792). PG&E's confidential response within DRU11578 provided the list of transmission substations where defensible space inspections were conducted, including location, methodology for selection, and any relevant landowner issues in confidential attachment DRU11578_ Q07_Atch01_Def.Space Insp_TransmissionSub_Data_CONF.

The defensible space focus for PG&E is within 30-ft from the substation within the first "Clean Zone" of the structure whereas the second zone "Reduced Fuel Zone" is between 30-ft and 100-ft of the substation and where vegetation must be maintained regularly (2022 WMP, page 792).

Per PG&E's Q4 QDR PGE-2022-Q4-QDR-20230201.xlsx Table 1 and PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694 (page 35), the Q2 update indicates the target was completed in Q2. The 2023 WMP states that "Landowner related issues continue to prevent PG&E from achieving 100 percent defensible space completion status at locations where substation defensible space zones extend into privately owned property."

The confidential attachment DRU11578_Q07_Atch01_Def.Space Insp_TransmissionSub_ Data_CONF describes landowner issues at three transmission substations that prevented PG&E from achieving 100% defensible space clearance at these locations. PG&E provided detailed information regarding the landowner issues that prevented full compliance with PRC Section 4291 code. These three transmission substations were included in the 55 reported completed inspections.

With the corresponding transmission substation defensible space inspections provided with the confidential DRU11578 documents, the IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section as summarized in Table 33.

Table 33: E.07 - Defensible Space Inspections - Transmission Substation Summary

Description	2022 Target	2022 WMP ARC Report	DRU11578 Response	Summary
Defensible Space Inspection of Transmission Substations	55 Transmission Substations	55 Transmission Substations	55 Transmission Substations	Target Met

7.3.5.17.3 - E.08 - Defensible Space Inspections - Hydroelectric Substations and Powerhouses

As described within the 2022 WMP dated July 26, 2022, PG&E committed to "Complete defensible space inspections at 61 Hydroelectric Generation Substations and Powerhouses within HFTD areas or HFRA, barring External Factors. Co-located hydroelectric substations and Transmission & Distribution substations are counted separately as two (2) distinct units" (page 795). PG&E's confidential response within DRU11578 provided the list of hydroelectric generation substations and powerhouses where defensible space inspections were conducted, including location, jurisdiction, and methodology for selection in confidential attachment DRU11578_Q08_Atch01_Def.Space Insp_Powerhouses_Data.

PG&E assessed the area around Hydro Generation Substations and Powerhouses in HFTD and HFRA areas in accordance with Procedure LAND-5201P-01. The defensible space focus for PG&E is within 30-ft from the substation within the first "Clean Zone" of the structure whereas the second zone "Reduced Fuel Zone" is between 30-ft and 100-ft of the substation and where vegetation must be maintained regularly (2022 WMP, page 794).

Per PG&E's Q4 QDR PGE-2022-Q4-QDR-20230201.xlsx Table 1 and PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694 (page 36), the Q2 update indicates the target was completed in Q2. With the corresponding hydroelectric generation substation and powerhouse defensible space inspections provided with the confidential DRU11578 documents, the IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section as summarized in Table 34.

Table 34: E.08 - Defensible Space Inspections - Hydroelectric Substations and Powerhouses Summary

Description	2022 Target	2022 WMP ARC Report	DRU11572 Response	Summary
Defensible Space Inspection of Hydroelectric Substations and Powerhouses Summary	61 Hydroelectric Substations and Powerhouses	61 Hydroelectric Substations and Powerhouses	61 Hydroelectric Substations and Powerhouses	Target Met

7.3.6.8 - F.04 - EPSS - Reliability Improvements

As described within the 2022 WMP dated July 26, 2022, PG&E committed to "Initiate reliability mitigations on 50 EPSS capable circuits in the HFTD areas, HFRA and non HFTD buffer zones based on highest projected Customer Experiencing Sustained Outage (CESO)" (page 844). PG&E's confidential response within DRU11581 provided the list of locations where reliability mitigations were installed, including circuit name and example as-builts, in confidential attachment DRU11581_Q04_Atch01_F04_ ReliabilityImprovements_ JulyYTD2022 Progress_072722. While the target requires PG&E only to initiate reliability work on the described 50 EPSS capable circuits (via an "EC Tag"), this document indicates that actual work completed includes 3,941 tags for the 50 EPSS capable circuits. PG&E provided four example as-builts as evidence of the completion of reliability improvements ("EC Tag").

Per PG&E's Q4 QDR PGE-2022-Q4-QDR-20230201.xlsx Table 1, the Q3 update indicates the target was completed in Q3; however, with an Activity Due Date of August 1, 2022, it is unclear if the final mitigation was completed by the due date. Per PG&E's ARC for 2022 WMP dated March 31, 2023, provided in DRU11694 (page 38), the target was completed in Q3. The 2023 WMP indicates that PG&E expanded the scope of EPSS in the service territory and indicated the total number and location of EPSS-capable miles. The 2023 WMP states, "Protection devices on another 47 transmission circuits were also engineered to provide EPSS protection." It is unclear if this number refers to WMP target F.04 for EPSS reliability improvements. The IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section, as summarized in Table 35.

Table 35: F.04 - EPSS - Reliability Improvements Summary

Description	2022 Target	2022 WMP ARC Report	DRU11572 Response	Summary
Reliability Mitigations Initiated on the Highest Projected CESO Circuits	50 Circuits	50 Circuits	50 Circuits	Target Met

7.3.10.1 - J.01 - Community Engagement – Meetings

As described within the 2022 WMP dated July 26, 2022, PG&E committed to hosting "22 customer and community focused virtual meetings…to further stakeholder and community awareness of PG&E's wildfire mitigation efforts" (page 969). PG&E's confidential response within DRU11585 provided attendance records, meeting literature, and meeting outlines for all twenty-three (23) community engagement town hall meetings and webinars. Thirteen (13) presentations were Town Hall virtual meetings and ten (10) were Wildfire Safety webinars with presentation content including:

1. Undergrounding
2. Overhead System Hardening
3. Sectionalizing Devices
4. Enhanced Vegetation Management
5. Types of Safety Related Outages
6. PSPS
7. EPSS
8. Customer Resources
9. Back-up Power Support
10. System Improvements
11. Information/Tools for Customers

Per PG&E's Q4 QDR PGE-2022-Q4-QDR-20230201.xlsx Table 1 and PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694 (page 38), the target was completed in Q3. With the corresponding meeting information provided in the DRU11585 response, the IE has confirmed that PG&E complied with the 2022 WMP initiatives within this section as summarized in Table 36.

Table 36: J.01 - Community Engagement – Meetings Summary

Description	2022 Target	2022 WMP ARC Report	DRU11585 Response	Summary
Public Outreach and education awareness program	22 Meetings	23 Meetings	23 Meetings	Target Met/Exceeded by 1 Meeting

3.1.4.2 Trends and Themes

For the evaluation of the Small Volume Quantifiable Goal/Target initiatives categorized by PG&E, at the commencement of this IE ARC Report, the IE reviewed publicly available documents, online articles, and related published reports as referenced throughout the section and detailed within Appendix B List of Supplemental Documents Reviewed. Concurrently, the IE submitted data requests and reviewed the PG&E provided confidential responses with various verification documentation, audit and commissioning reports, and as-builts with a summary of received documentation below in Figure 31 for the 20 initiatives in this category.

Note: PG&E provided documentation included in the corresponding initiative DRUs to IE Data Requests are confidential within this section.

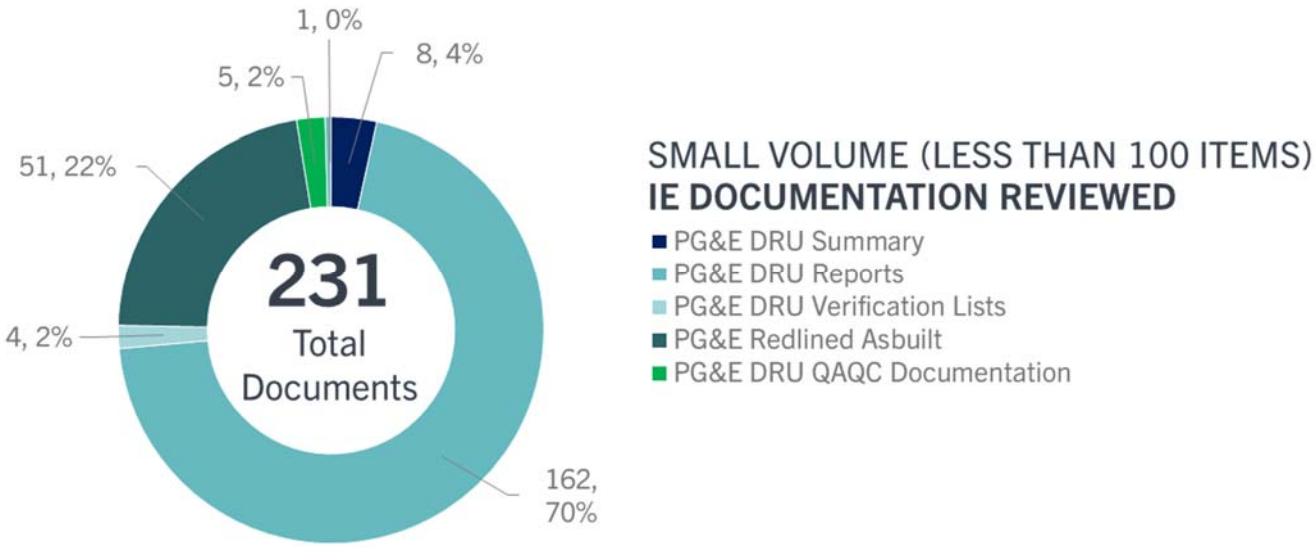

Figure 31: IE Documentation Reviewed for Small (Less than 100 Units) Volume

The following is an overview of the themes and trends extrapolated after reviewing the various sections of Small Volume Quantifiable Goal/Target and as summarized in Table 37. The interpretation incorporates various categories, including utility protocols and standards for such work, along with assessments of the quality of the information provided to support our overall

review. Through the review and evaluation of these WMP activities, PG&E's trend across the 2022 WMP activities identified within this section complies with the stated goals identified within the 2022 WMP, and PG&E continues to incorporate data-collected analytics, lessons learned, and technological assessments into the 2022 goals and future PG&E initiatives.

PG&E has developed a broad range of activities that are designed to reduce the likelihood of initiating a wildfire such as infrastructure and vegetation inspections, equipment replacements, and conversions to underground facilities. They also have developed activities to minimize the occurrence and impacts of any Public Safety Power Shutoffs (PSPS) by initiating EPSS mitigations, installing remote grids, installing additional SCADA equipment, circuit sectionalizing, and other technological improvements.

All of the initiatives reviewed in this section were found to have been completed demonstrated by the documents provided in the data requests.

Table 37: Small Volume Quantifiable Goal/Target Summary Table

SOW Category	2022 Initiative Number	Initiative Name	Finding	Detail on Finding
WMP Activity Completion	7.3.2.2.3 - B.04	Distribution Fault Anticipation (DFA) - Installations	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.2.2.3 - B.05	Early Fault Detection (EFD) - Installations	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.2.2.5 - B.06	Line Sensor - Installations	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.3.8.2 - C.03	Transmission Line Sectionalizing - Install and SCADA commission	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.3.8.3 - C.04	Distribution Line Motorized Switch Operator (MSO) - Replacements	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.3.9.1 - C.05	SCADA Recloser Equipment - Installations	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.3.9.2 - C.06	Fuse Savers (Single Phase Reclosers) - Installations	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.3.11.1 - C.07	Temporary Distribution Microgrids	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.3.11.2 - C.08	Rincon Transformer Fuse - Replacement	Activity Completed	Compliant with the 2022 WMP

WMP Activity Completion	7.3.3.11.3 - C.09	Emergency Back-up Generation – Equip PG&E Service Centers & Materials Distribution Centers	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.3.17.2 - C.12	System Hardening - Transmission	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.3.17.5 - C.14	Remote Grid - Operate New SPS Units	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.3.17.6 - C.15	Butte County Rebuild - Undergrounding	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.4.15 - D.06	Supplemental Inspections - Substation Distribution	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.4.15 - D.07	Supplemental Inspections - Substation Transmission	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.4.16 - D.08	Supplemental Inspections - Hydroelectric Substations and Powerhouses	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.5.17.2 - E.07	Defensible Space Inspections - Transmission Substation	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.5.17.3 - E.08	Defensible Space Inspections - Hydroelectric Substations and Powerhouses	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.6.8 - F.04	EPSS - Reliability Improvements	Activity Completed	Compliant with the 2022 WMP
WMP Activity Completion	7.3.10.1 - J.01	Community Engagement - Meetings	Activity Completed	Compliant with the 2022 WMP

3.1.5 Qualitative Goal/Target

3.1.5.1 Review of Initiatives

Pursuant to the Final IE Scope of Work for the Review of Compliance with 2022 WMP, PG&E provided a complete list of all 2022 WMP activities classified as Qualitative Goal/Target that were conducted in 2022. The 2022 WMP activities identified within the Qualitative list were assessed within this section and are presented below within Tables 38 to 43 grouped by the associated initiative category. The vegetation management activities follow the table in narrative form. The IE findings are defined as follows:

- Activity Validated – Qualitative work on the initiative began and ended in 2022.
- Activity In Progress – Qualitative work on the initiative began in 2022 and continues into 2023.

- Activity Ongoing – Qualitative work on the initiative is incorporated into operations to be repeated annually.

Table 38: Risk Assessment and Mapping Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
7.3.1.3 - A.01 - Distribution Modeling Enhancements - Equipment Failure and Contact From Object	Develop additional Distribution Equipment Failure and Distribution Contact From Object sub-models and conduct assessment to determine whether newly developed sub-models should be included in the WDRM model	▪ Presentation outlining Distribution Equipment Failure (EFF) and Distribution Contact From Object (CFO) for inclusion/exclusion in Version 4 of the WDRM model in confidential response to DRU11553 in Attachment 35.2 DRU11553_Q01_Atch01_12.07.2022 Wildfire Risk Governance Forum_CONF ▪ Email confirming adoption of inclusion of new sub-models in Version 4 of the WDRM model in confidential response to DRU11553 in Attachment 35.3 DRU11553_Q01_Atch02_Email Approval WRGSC Final Materials for 12_7_2022_CONF ▪ PG&E Quarterly Notification Regarding the Implementation of Its Approved Wildfire Mitigation Plan, Q4 2022 Update (See Appendix D, Section 1.2, Table 1) ▪ PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694	Activity Validated
7.3.1.3 - A.02 - Transmission Modeling Enhancements - Threat and Hazard Risk Drivers	Develop Threat and Hazard sub models and conduct assessment to determine whether newly developed sub-models are to be included in the WTRM model	▪ Wildfire Risk Transmission Model Version 1 presentation for WRGSC included in confidential response DRU11554 attachment 38.2 DRU11554_Q01_Atch01_09.14.2022 WRGSC_vf_CONF ▪ Email approval from WRGSC for Wildfire Risk Transmission Model Version 1 included in confidential response DRU11554 attachment 38.3 DRU11554_Q01_Atch02_Email Approval WRGSC Final Materials for 09.14.2022_CONF	Activity Validated

		▪ PG&E Quarterly Notification Regarding the Implementation of Its Approved Wildfire Mitigation Plan, Q4 2022 Update (See Appendix D, Section 1.2, Table 1) ▪ PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694	
7.3.1.4 - A.03 - PSPS Consequence Model	Conduct an assessment of the PSPS Consequence model to inform if it is fit for use to inform PSPS mitigation plans to minimize customer impact	▪ PSPS Consequence Model presentation for WRGSC included in confidential response DRU11555 attachment 36.1 DRU11555_Q01_Atch01_05.18.2022 Wildfire Risk Governance Forum_CONF ▪ Email approval from WRGSC for PSPS Consequence Model included in confidential response DRU11555 attachment 36.2 DRU11555_Q01_Atch02_Email Approval WRGSC Final Materials for 05.18.2022_CONF ▪ PG&E Quarterly Notification Regarding the Implementation of Its Approved Wildfire Mitigation Plan, Q4 2022 Update (See Appendix D, Section 1.2, Table 1) ▪ PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694	Activity Validated
7.3.1.5 - A.04 - Wildfire Consequence Model Enhancements - Ingress/Egress	Develop an approach on how to incorporate ingress/egress into the Wildfire Consequence Model	▪ Wildfire Consequence Enhancements: Ingress/Egress presentation for WRGSC included in confidential response DRU11560 attachment 37.2 DRU11560_Q01_Atch01_WRGSC Final Materials for 11_16_2022 & 11_17_2022_CONF ▪ Email approval from WRGSC for Egress Wildfire Consequence Enhancements included in confidential response DRU11560 attachment 37.3 DRU11560_Q01_Atch02_Email Approval_11.16.2022 WRGSC_vF_CONF ▪ PG&E Quarterly Notification Regarding the Implementation of Its Approved Wildfire Mitigation Plan, Q4 2022	Activity Validated

		Update (See Appendix D, Section 1.2, Table 1) ▪ PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694	
7.3.1.5 - A.05 - Wildfire Consequence Model Enhancements - Resistance to Control	Evaluate an approach to incorporate "Resistance to Control" (i.e., TDI) into the Wildfire Consequence Model	▪ Wildfire Consequence Enhancements: Resistance to Control presentation for WRGSC included in confidential response DRU11562 attachment 40.2 DRU11562_Q01_Atch01_WRGSC Final Materials for 11_16_2022 & 11_17_2022_CONF ▪ Email approval from WRGSC for Suppression Wildfire Consequence Enhancements included in confidential response DRU11562 attachment 40.3 DRU11562_Q01_Atch02_Email Approval_11.16.2022 WRGSC_vF_CONF ▪ PG&E Quarterly Notification Regarding the Implementation of Its Approved Wildfire Mitigation Plan, Q4 2022 Update (See Appendix D, Section 1.2, Table 1) ▪ PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694	Activity Validated

Table 39: Situational Awareness & Forecasting Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
7.3.2.1.1 - B.01 - FPI and IPW Modeling - Revision Evaluation	Evaluate running the FPI and IPW Models with the ensemble mean output of the POMMS-EPS	▪ Data Request Response Description included in confidential response 41.1 DRU11564_IE_WSD-022_B.01-7.3.2.1.1_DR_BVNA_019_Q001_R001 ▪ PG&E Q2 2022 Emsemble WRF Verification Report included in confidential response 41.2 DRU11564_Q01_Atch01_PGE Q2 2022 Ens WRF Verification_CONF ▪ Ensemble Mean Screen Capture included in confidential response 41.3 DRU11564_Q01_Atch02_EnsembleMean	Activity Validated

		▪ Ensemble Mean 2 Screen Capture included in confidential response 41.4 DRU11564_Q01_Atch03_EnsembleMean2 ▪ WRGSC Presentation and Approval dated August 23, 2022, included in DRU11564 in confidential response 41.7 08.24.2022 Wildfire Risk Governance Forum vF (002)_CONF	

Table 40: Asset Management and Inspections Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
7.3.4.14 - D.09 - Asset Inspections - Quality Assurance	Perform Transmission and Distribution system inspection quality audits prioritizing HFTD/HFRA areas	▪ Transmission Quality Verification Audit Final Report confidential response to DRU 11575 in Attachment 48.2 DRU11575_Q09_Atch01_Transmission_Final Report 713 System Inspections Rev.2_CONF ▪ Distribution Quality Verification Audit Final Report confidential response to DRU 11575 in Attachment 48.2 DRU11575_Q09_Atch01_Transmission_Final Report 713 System Inspections Rev.2_CONF ▪ PG&E Quarterly Notification Regarding the Implementation of Its Approved Wildfire Mitigation Plan, Q4 2022 Update (See Appendix D, Section 1.2, Table 1) ▪ PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694	Activity Validated

Table 41: Grid Operations and Protocols Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
7.3.6.8 - F.01 - EPSS - Settings Design and Test	Conduct laboratory testing to refine the circuit device design parameters for 2022 EPSS implementation	▪ ATS EPSS Clearing Testing Report included in confidential response DRU11581 attachment 50.2 DRU11581_Q01_Atch01_ATS EPSS Clearing Testing Report_CONF ▪ PG&E Quarterly Notification Regarding the Implementation of Its Approved Wildfire Mitigation Plan, Q4 2022 Update (See Appendix D, Section 1.2, Table 1) ▪ PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694	Activity Validated
7.3.6.8 - F.03 - EPSS - Develop Enablement Standards and Procedures	Develop the procedure to govern the enablement of EPSS settings in 2022	▪ Utility Procedure TD-2700P-26 included in confidential response DRU11581 attachment 49.2 DRU11581_Q03_Atch01_EPSS_TD-2700P-26_Final_428_CONF ▪ Utility Standard [TD-1470S] included in confidential response DRU11581 attachment 49.3 DRU11581_Q03_Atch02_TD-1470S EPSS Standard_CONF ▪ Utility Procedure TD-1470P-01 and Utility Procedure TD-1470P-01 Attachment 1 included in confidential response DRU11581 attachment 49.5 DRU11581_Q03_Atch04_TD-1470P-01 EPSS Enablement Criteria_CONF and 49.4 DRU11581_Q03_Atch03_TD-1470P-01 Att 1 Application Guide Device Profile Settings_CONF, respectively ▪ Utility Procedure TD-1400P-07 Attachment 2 included in confidential response DRU11581 attachment 49.6 DRU11581_Q03_Atch05_TD-1400P-07-Att2-Transmission Non-Reclose and EPSS_CONF	Activity Validated

		▪ PG&E Quarterly Notification Regarding the Implementation of Its Approved Wildfire Mitigation Plan, Q4 2022 Update (See Appendix D, Section 1.2, Table 1) ▪ PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694	

Table 42: Data Governance Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
7.3.7.1 - G.01 - Data Governance - Identify and Centralize High Priority Data	Identify and incorporate 20 new, foundational ontology objects into Foundry	▪ Documented process to identify data gaps in Foundry for critical risk drivers (TD-8108 – Asset Data Asset Management Plan) included in confidential response DRU11583 attachment 47.2 DRU11583_Q01_Atch01_TD-8108_CONF ▪ Requirements for developing Level 2 Ontology objects/high-priority datasets in Foundry (Technical Standard, Ontology Minimum Requirements) included in confidential response DRU11583 attachment 47.3 DRU11583_Q01_Atch02_Enterprise Data Foundation - Ontology Minimum Requirements Release v1.7_CONF ▪ Foundry Ontology Tracker included in confidential response DRU11583 attachment 47.4 DRU11583_Q01_Atch03_Foundry_ Ontology_Tracker_03.29.2023 ▪ PG&E Quarterly Notification Regarding the Implementation of Its Approved Wildfire Mitigation Plan, Q4 2022 Update (See Appendix D, Section 1.2, Table 1) ▪ PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694	Activity Validated

Table 43: Resource Allocation Methodology Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
7.3.8.3 - H.01 - Risk Spend Efficiency - Develop and Share Governance Process	Develop and share RSE Governance Process with Energy Safety	▪ RSE governance process provided in confidential response DRU11584 in Attachment 43.3 DRU11584_Q01_Atch02_PGE Risk Spend Efficiency (RSE) Governance 20220920_CONF ▪ Email to OEIS dated September 22, 2022, with RSE governance process attachment provided in confidential response DRU11584 in Attachment 43.2 DRU11584_Q01_Atch01_Update on PG&E RSE Governance Process per 2022 WMP_CONF ▪ PG&E Quarterly Notification Regarding the Implementation of Its Approved Wildfire Mitigation Plan, Q4 2022 Update (See Appendix D, Section 1.2, Table 1) ▪ PG&E's ARC for 2022 WMP Report dated March 31, 2023, provided in DRU11694	Activity Validated

3.1.5.2 Trends and Themes

The IE team evaluated Qualitative Goals/Targets for 11 initiatives related to PG&E's 2022 WMP. The IE reviewed publicly available documents, online articles, and related published reports as referenced throughout the section and detailed in Appendix B, List of Supplemental Documents Reviewed. Concurrently, the IE submitted data requests and reviewed the PG&E provided confidential responses with various verification documentation, multiple reports that included photos and screenshots, and verification lists with a summary of received documentation below in Figure 32. Validation was also conducted through SME interviews, as listed within Appendix D.

Note: Some PG&E-provided documentation included in the corresponding initiative DRUs to IE Data Requests are noted as confidential within this section.

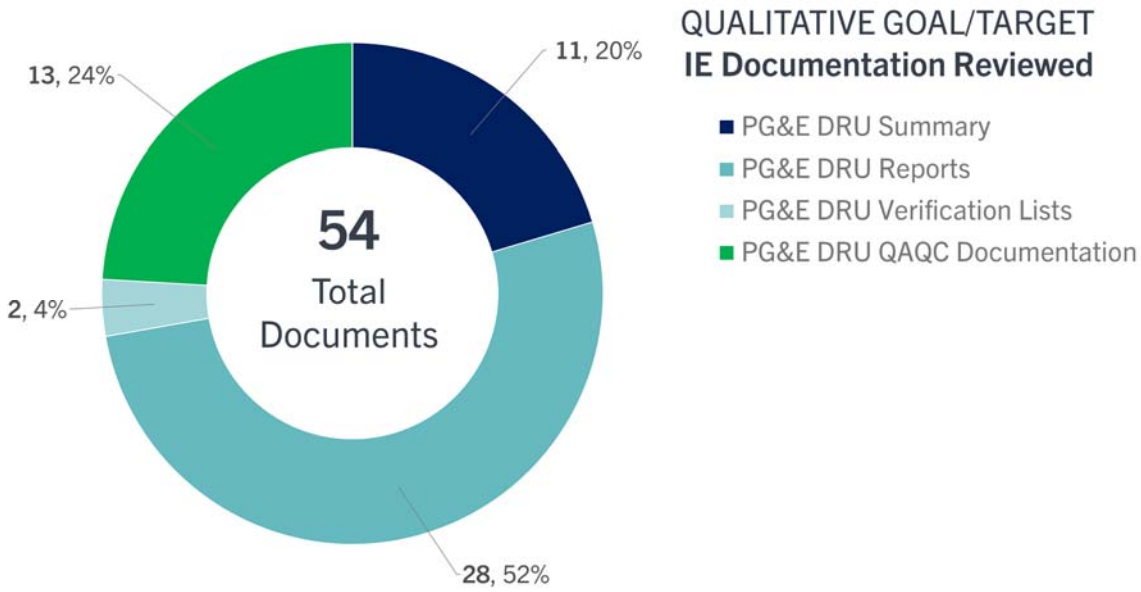

Figure 32: IE Documentation Reviewed for Qualitative Goal/Target

Information reviewed during the evaluation of the initiatives underscored the ongoing nature of the efforts associated with the qualitative goals/targets. PG&E has approached the qualitative goals systematically, relying on established processes where appropriate, developing new strategies to fill in, monitoring outcomes, and refining the approach to incorporate feedback to be carried forward to future wildfire mitigation efforts. PG&E completed considerable improvements to its wildfire modeling programs, continued to conduct quality assurance inspections for transmission and distribution systems, and enhanced procedures, standards, and overall governance processes for wildfire mitigation.

PG&E's trend across the 2022 WMP activities identified within this section complies with the stated goals identified within the 2022 WMP.

3.2 Verification of Funding

The IE team reviewed the funding for each initiative of the 2022 WMP to evaluate and verify it. This initial assessment aimed to assess the alignment of public records issued by PG&E (from February 2022 to date) and compare those records to the information PG&E provided in response to the IE's data request for financials. The assessment included reviewing the Actual and Planned expenditures and their totals, followed by a detailed breakdown of the Actual and Planned expenditures for the Expense and Capital costs separately. The approach provided an initial big-picture understanding of the overall initiative spending trends. This section's detailed analysis and findings support the report's associated trends and justifications for funding compliance.

To evaluate PG&E's 2022 WMP, dated July 26, 2022, and the costs related to it, the IE asked for PG&E's final record and received PG&E's ARC, dated March 31, 2023, for the 2022 WMP Report, as part of the response to DRU11694, with the financial data and details for the ten (10) 2022 WMP initiative categories broken down to a total of 129 initiatives. Per OEIS's direction, the IE must record all instances in which PG&E provided less than 100% of the funding for WMP activities in this section. In addition, the IE utilized the information to verify and document PG&E's explanations of the instances in which PG&E funded WMP activities at less than 100 percent.

Concurrently, the IE conducted a comparative analysis to identify discrepancies between the three data documents/data sets listed below. The contrasting of the three documents helped assess the cohesiveness and continuity of information presented across three separate timelines.

- 2022 WMP, dated July 26, 2022 (*)
- PG&E's ARC, dated March 31, 2023, as part of the response to DRU11694
- 2023-2025 WMP R1, dated April 6, 2023 (**)

(*): See Section 3 labeled Actuals and Planned Spending for Mitigation Plan, specifically Table 3.1-1: Summary of WMP Expenditures – Total and Table 3.1-2: Summary of WMP Expenditures by Category.
(**): Section 4 labeled Overview of WMP, specifically Table 4-1: Summary of WMP Expenditures and Figure PG&E – 4 .3-1: Summary of WMP Expenditures and the subset of notes below the table shown on page 68.

In the following Table 44: Summary of 2022 WMP Total Expenditure, Expense and Capital (Thousands of Dollars), the IE lists 2022 Planned and Actual costs and their variance per PG&E's ARC for the 2022 WMP Report Dated March 31, 2023, provided in DRU11694. In addition, Table 44 shows the IE-calculated variance percentages for the ten WMP categories.

Table 44: Summary of 2022 WMP Total Expenditure, Expense and Capital (Thousands of Dollars)

Initiative Category	2022 Planned	2022 Actual	2022 Variance	Variance %
7.3.1 Risk Assessment and Mapping	$7,954	$8,233	$279	4%
7.3.2 Situational Awareness and Forecasting	$82,929	$50,321	-$32,608	-39%
7.3.3 Grid Design and System Hardening	**$4,129,058***	**$3,573,736***	**-$555,322***	**-13%***
7.3.4 Asset Management and Inspections	$281,294	$247,278	-$34,016	-12%
7.3.5 Vegetation Management and Inspections	$1,980,005	$1,792,927	-$187,078	-9%
7.3.6 Grid Operations and Protocols	$258,000	$127,913	-$130,088	-50%
7.3.7 Data Governance	$97,822	$99,407	$1,585	2%
7.3.8 Resource Allocation Methodology	$9,774	$7,471	-$2,303	-24%
7.3.9 Emergency Planning & Preparedness	$56,693	$43,022	-$13,671	-24%
7.3.10 Stakeholder Cooperation & Community Engagement	$54,667	$51,834	-$2,833	-5%
Totals	$6,958,195	$6,002,142	-$956,053	-14%
Reductions	-$994,250	-$695,040	$299,210	**N/A**
Adjusted Totals	**$5,963,945**	**$5,307,103**	**-$656,842**	**-11%**

*Adjustments noted by PG&E in the PG&E's ARC (dated March 31, 2023, for the 2022 WMP Report, as part of the response to DRU11694).

The adjustments, described in the PG&E's ARC, specifically Appendix B file titled: DRU11694_Q001_Atch2_PGE_Annual_Report_on_Compliance__Appendix_B states: "Adjustments to remove the Capital costs' double count toward the Total (e.g., 7.3.3.3 Covered

OH Conductor, 7.3.3.16 Underground program, 7.3.3.17.5 Remote Grid), as those costs are already embedded in 7.3.3.17.1 System Hardening initiative."

Thus the 2022 Planned, 2022 Actual, and 2022 Variance and Variance Percentage for 7.3.3 Grid Design and System Hardening are reduced by the Capital cost amounts broken down in the Table 45 below:

Table 45: 7.3.3 Grid Design and System Hardening Capital Summary

2022 Initiative Number and Name	2022 Planned	2022 Actual	2022 Variance	2022 Variance %
7.3.3 Grid Design and System Hardening	**$4,129,058***	**$3,573,736***	**-$555,322***	**-13%***
▪ 7.3.3.3 Covered OH Conductor	-$366,000	-$285,544	$80,456	N/A
▪ 7.3.3.16 Underground program	-$611,250	-$406,762	$204,488	N/A
▪ 7.3.3.17.5 Remote Grid	-$17,000	-$2,734	$14,266	N/A
Total Reductions	-$994,250	-$695,040	$299,210	N/A
Adjusted Totals of 7.3.3 Grid Design and System Hardening	**$3,134,808**	**$2,878,696**	**-$256,112**	**-8%**

*Adjustments noted by PG&E in the PG&E's ARC (dated March 31, 2023, for the 2022 WMP Report, as part of the response to DRU11694).

In the table above, the IE summarized PG&E's realignments/adjustments for the 7.3.3.17.1 System Hardening initiative to continue its analysis of the capital expenditures of the three initiatives that PG&E embedded.

The IE acknowledges PG&E's year-over-year efforts to align and fit its programs and investments with the OEIS-defined list of initiatives, as stated in PG&E Response to Final Independent Evaluator Report Concerning 2021 Wildfire Mitigation Plan Compliance (Docket No. 2022-IE), dated August 15, 2021, Section 4a, WMP Funding Overview: "However, this re-categorization process creates additional challenges because some of the financial discrepancies identified by BVNA are, in fact, the result of our attempts to align our funding categories with those described in the WMP. In addition, we continue to refine our WMP reporting and updated financials to align with programs and narratives described in various initiatives."

The key findings of the IE analysis of Expense and Capital expenditures are summarized below. However, in the subsequent sections, 3.2.2 IE Analysis of Underspend Expenditure and 3.2.3 Summary of Underspend Instances, the IE team thoroughly analyzed and listed the underspend, which is any record of a 2022 WMP initiative/activity funded less than 100 percent, as defined by the OEIS.

The IE's analysis identified three initiative categories with a variance of more than $100 million decrease and a variance percentage ranging from 9% to 50% less than the overall initially planned 2022 budgets:

- 7.3.3 Grid Design and System Hardening
- 7.3.5 Vegetation Management and Inspections
- 7.3.6 Grid Operations and Protocols

After further analysis of the Expense and Capital expenditures separately and a review of each of the 2022 WMP initiatives' underspend drivers and explanations provided by PG&E to determine whether the targets or risk reduction intents were met or not, the IE has summarized its findings as follows:

For 7.3.3 Grid Design and System Hardening, PG&E has listed 33 initiatives under this category and separated the Expense and Capital expenditure for each. The IE-calculated total underspend is -$256.112M (-$122.637M in Expense and -$133.475M in Capital)

- Cost savings are approximately -$92.3M in Capital for two initiatives (7.3.3.3 and 7.3.3.7)
- Over forecasting the planned budget by roughly -$25M in Capital and $6M in Expense for two initiatives (7.3.3.8.2 and 7.3.3.12.4)
- Delays in the project schedule or delayed project start (identification and development) resulted in less work being completed in 2022, contributing to most of the remaining decreased expenditure variances.
- Other drivers for underspend are listed in Section 3.2.3 Summary of Underspend Instances

According to PG&E, some of the initiatives listed under this category will continue in 2023 and beyond, and the 2023–2025 WMP R1, dated April 6, 2023, outlines the targets and areas where PG&E intends to reduce wildfire potential by reducing ignitions through the various programs.

For 7.3.5 Vegetation Management and Inspections, PG&E has listed 25 initiatives under this category and separated the Expense and Capital expenditure for each. The IE-calculated total underspend is -$187.078M (-$143.741M in Expense and -$43.337M in Capital)

- EVM program costs were lower due to reduced unit costs, which were partially offset by higher unit costs and a reduced volume of completed units in the Routine Program, resulting in -$32.63M of the Expense forecast not being spent (7.3.5.2)
- Budget constraints resulted in reduced work volume completed in 2022, resulting in approximately -$43M of the Capital costs deferred to 2023 (7.3.5.3)
- Significant reduction in LiDAR scope of approximately -$33.5M of Expense forecast not being spent (7.3.5.7)
- A transition from the Vegetation Management Enterprise System was planned for the beginning of 2022, but PG&E postponed it to 2023, resulting in approximately -$71M of the Expense forecast not being spent (7.3.5.19)

For 7.3.6 Grid Operations and Protocols, PG&E has listed 10 initiatives under this category and separated the Expense and Capital expenditure for each. The IE-calculated total underspend is -$130.088M (-$143.16M in Expense and $13.075M in Capital)

- PSPS events did not happen as weather conditions were more favorable in 2022, resulting in approximately -$68.8M of the Expense costs saved (7.3.6.5-D)
- EPSS Patrol is lower than planned primarily due to improvements/efficiencies made by the EPSS, resulting in approximately -$59.7M of the Expense costs saved (7.3.6.8)

3.2.1 IE Analysis of Expense and Capital Expenditure

Based on the information provided in PG&E's ARC for the 2022 WMP Report Dated March 31, 2023, provided in DRU11694, and additional information and explanation for the Expense and Capital underspent funds provided in DRU11935, the IE team was able to break down the Expense and Capital costs into two separate tables, Table 46: Summary of 2022 WMP Expense Expenditure and Table 47: Summary of 2022 WMP Capital Expenditure. The details provided by PG&E to the IE enabled a more detailed review of the planned allocations vs. actual expenditures, the calculated variance amounts, and percentages.

Table 46: Summary of 2022 WMP Expense Expenditure (Thousands of Dollars)

Initiative Category	Expense Planned	Expense Actual	Expense Variance	Expense Variance %
7.3.1 Risk Assessment and Mapping	$4,940	$6,042	$1,102	22%
7.3.2 Situational Awareness and Forecasting	$33,526	$28,519	-$5,007	-15%

7.3.3 Grid Design and System Hardening	$450,101	$327,465	-$122,636	-27%
7.3.4 Asset Management and Inspections	$266,591	$240,296	-$26,295	-10%
7.3.5 Vegetation Management and Inspections	$1,901,305	$1,757,564	-$143,741	-8%
7.3.6 Grid Operations and Protocols	$251,814	$108,654	-$143,160	-57%
7.3.7 Data Governance	$48,523	$46,911	-$1,612	-3%
7.3.8 Resource Allocation Methodology	$4,482	$2,258	-$2,224	-50%
7.3.9 Emergency Planning & Preparedness	$56,693	$43,022	-$13,671	-24%
7.3.10 Stakeholder Cooperation & Community Engagement	$54,667	$51,834	-$2,833	-5%
Totals	**$3,072,640**	**$2,612,563**	**-$460,077**	**-15%**

The IE has observed that a total of 9 out of the 10 initiative categories did not meet their initially planned amounts based on the aggregate totals of expense costs varying from 3% to 57% less than planned amounts, and a variance between $1.6M and $143.7M decrease. The following four WMP initiative categories have the highest underspend amounts:

- 7.3.3 Grid Design and System Hardening
- 7.3.4 Asset Management and Inspections
- 7.3.5 Vegetation Management and Inspections
- 7.3.6 Grid Operations and Protocols

Table 47: Summary of 2022 WMP Capital Expenditure (Thousands of Dollars)

Initiative Category	Capital Planned	Capital Actual	Capital Variance	Capital Variance %
7.3.1 Risk Assessment and Mapping	$3,014	$2,191	-$823	-27%
7.3.2 Situational Awareness and Forecasting	$49,403	$21,803	-$27,600	-56%
7.3.3 Grid Design and System Hardening	**$3,678,956***	**$3,246,271***	**-$432,685***	**-12%***
7.3.4 Asset Management and Inspections	$14,703	$6,982	-$7,721	-53%
7.3.5 Vegetation Management and Inspections	$78,701	$35,364	-$43,337	-55%
7.3.6 Grid Operations and Protocols	$6,185	$19,260	$13,075	211%
7.3.7 Data Governance	$49,300	$52,496	$3,196	6%
7.3.8 Resource Allocation Methodology	$5,292	$5,212	-$80	-2%
7.3.9 Emergency Planning & Preparedness	$0	$0	$0	0% Planned
7.3.10 Stakeholder Cooperation & Community Engagement	$0	$0	$0	0% Planned
Totals	$3,885,555	$3,389,578	-$495,976	-13%
Adjusted Totals	**$2,891,305**	**$2,694,539**	**-$196,766**	**-7%**

*Adjustments noted by PG&E in the PG&E's ARC (dated March 31, 2023, for the 2022 WMP Report, as part of the response to DRU11694). The adjustments remove the Capital costs' double count toward Total (e.g., 7.3.3.3 Covered OH Conductor, 7.3.3.16 Underground program, 7.3.3.17.5 Remote Grid), as those costs are already embedded in 7.3.3.17.1 System Hardening initiative.

The IE has observed that a total of 6 out of the 10 initiative categories did not meet their initially planned amounts based on the aggregate totals of capital costs varying from 2% to 56% less than

planned amounts, and a variance between $80K and $432.6M decrease. The following three WMP initiative categories have the highest underspend amounts:

- 7.3.2 Situational Awareness and Forecasting
- 7.3.3 Grid Design and System Hardening
- 7.3.5 Vegetation Management and Inspections

3.2.2 IE Analysis of Underspend Expenditure

The IE team further evaluated the Expense and Capital expenditure information received in PG&E's ARC, dated March 31, 2023, for the 2022 WMP Report, as part of the response to DRU11694, for all WMP initiatives and summarized its findings based on the IE underspent categories shown below and in Figure 33 – Breakdown of Expense and Capital by IE Underspend Categories:

- $0M - $1M
- $1M - $5M
- $5M - $10M
- $10M - $20M
- $20M - $50M
- More than $50M

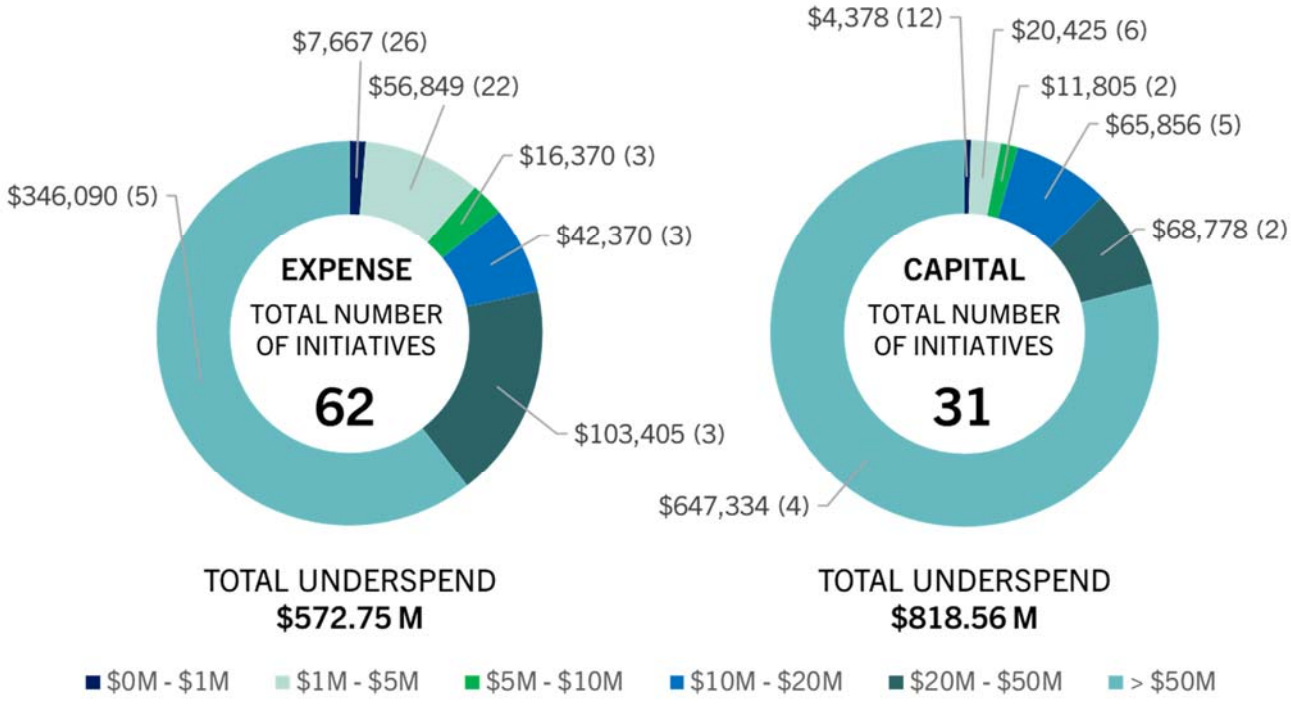

Figure 33: Breakdown of Expense and Capital by IE Underspend Categories (Thousands of Dollars)

Note: The amounts shown in the figure above are in thousands of dollars and are the sum of underspend of all initiatives under each IE Underspend Category (the negative sign has been omitted for illustration purposes). Additionally, the count/number of all initiatives under each IE Underspend Category is shown in parenthesis (next to the sum). The IE did not include any initiatives with a variance amount equal to $0.

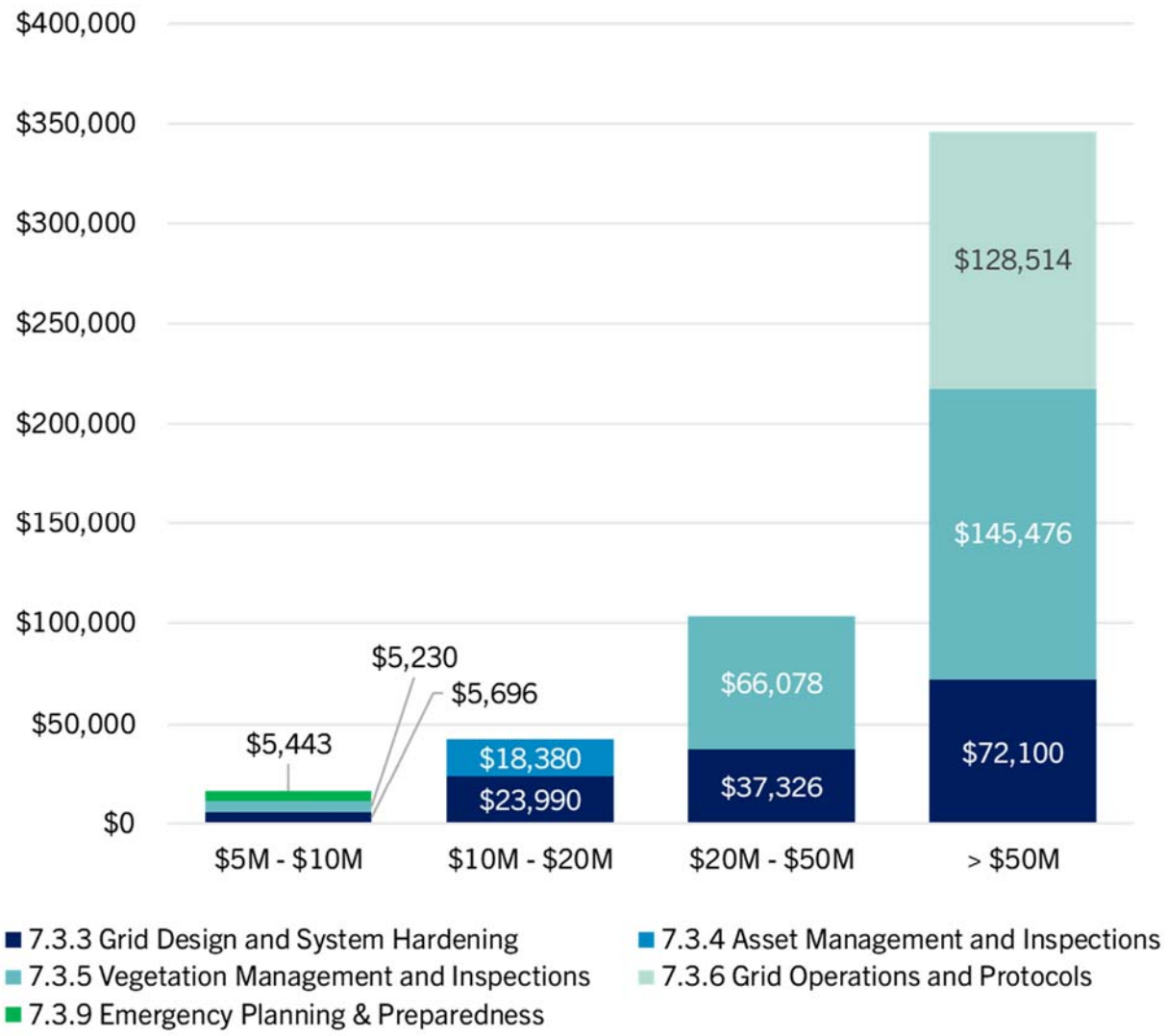

Figure 34: Breakdown of Expense for Top 4 IE Underspend Categories (Thousands of Dollars)

Table 48: Summary of Expense for Top 4 IE Underspend Categories (Thousands of Dollars)

Initiative Category	2022 Initiative Number	Initiative Name	Capital Variance	Capital Variance %
7.3.3 Grid Design and System Hardening	7.3.3.11.1	Mitigation of impact on customers and other residents affected during PSPS event, Generation for PSPS Mitigation	-$72,100	-64%
7.3.3 Grid Design and System Hardening	7.3.3.12.3	Other corrective action, Maintenance, Transmission	-$37,326	-29%
7.3.3 Grid Design and System Hardening	7.3.3.12.4	Other corrective action, Maintenance, Distribution	-$11,194	-12%
7.3.3 Grid Design and System Hardening	7.3.3.17.5	Updates to grid topology to minimize risk of ignition in HFTDs, Remote Grid	-$12,795	-86%
7.3.3 Grid Design and System Hardening	7.3.3.11.4	Fixed Power Solutions	-$5,696	-73%
7.3.4 Asset Management and Inspections	7.3.4.2	Detailed inspections of transmission electric lines and equipment	-$18,380	-21%
7.3.5 Vegetation Management and Inspections	7.3.5.2	Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment	-$32,630	-2%
7.3.5 Vegetation Management and Inspections	7.3.5.6	Improvement of inspections	-$74,339	-52%
7.3.5 Vegetation Management and Inspections	7.3.5.7	Remote sensing inspections of vegetation around distribution electric lines and equipment	-$33,449	-90%
7.3.5 Vegetation Management and Inspections	7.3.5.8	Remote sensing inspections of vegetation around transmission electric lines and equipment	-$5,230	-40%
7.3.5 Vegetation Management and Inspections	7.3.5.19	Vegetation management system	-$71,137	-77%

7.3.6 Grid Operations and Protocols	7.3.6.5-D	PSPS events and mitigation of PSPS impacts, Distribution	-$68,812	-100%
7.3.6 Grid Operations and Protocols	7.3.6.8	Protective equipment and device settings	-$59,703	-42%
7.3.9 Emergency Planning & Preparedness	7.3.9.5	Preparedness and planning for service restoration	-$5,443	-34%

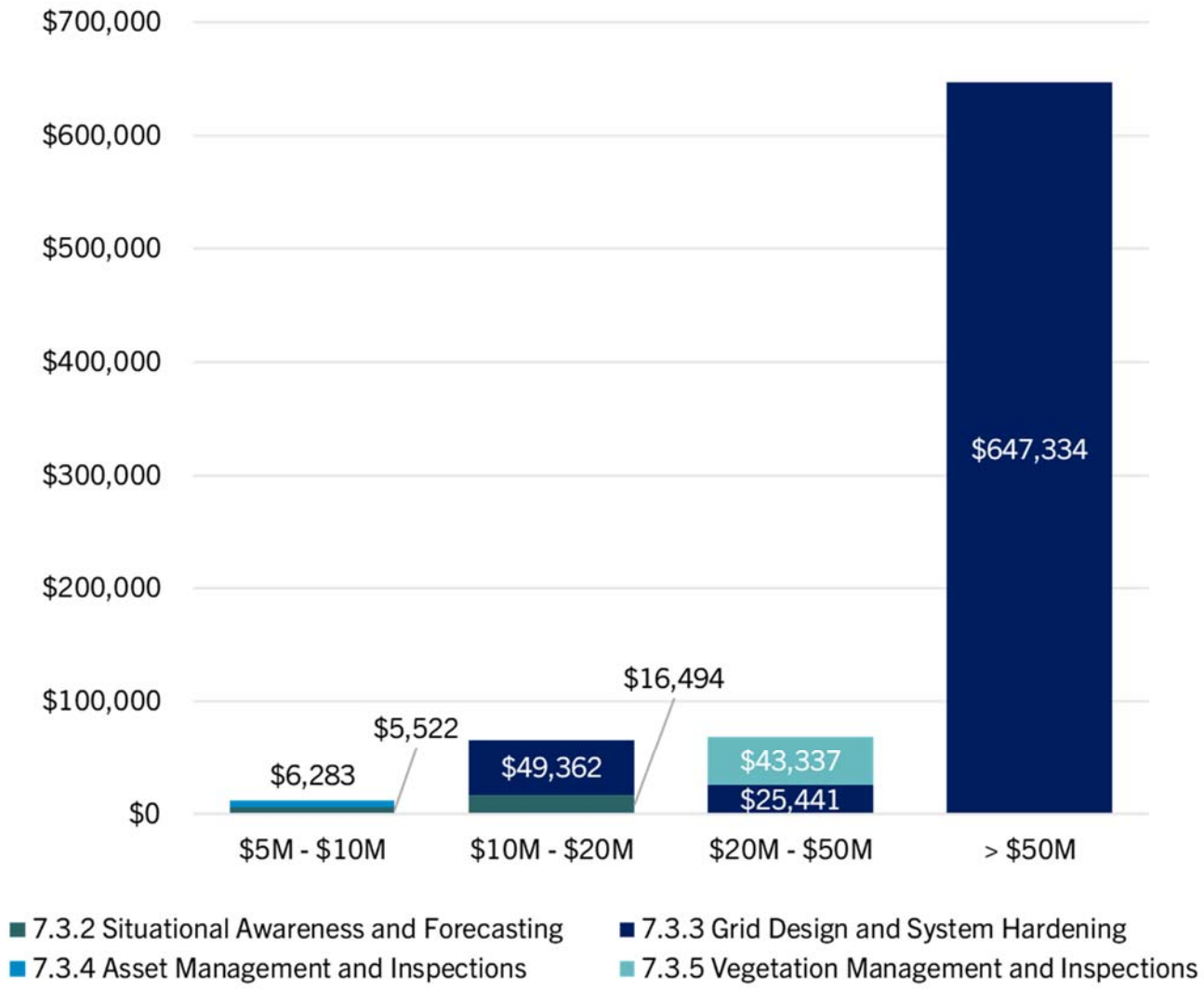

Figure 35: Breakdown of Capital for Top 4 IE Underspend Categories (Thousands of Dollars)

Table 49: Breakdown of Capital for Top 4 IE Underspend Categories (Thousands of Dollars)

Initiative Category	2022 Initiative Number	Initiative Name	Capital Variance	Capital Variance %
7.3.2 Situational Awareness and Forecasting	7.3.2.2.5	Continuous monitoring sensors, Line Sensor Devices	-$5,522	-71%
7.3.2 Situational Awareness and Forecasting	7.3.2.2.7	Continuous monitoring sensors, DTS FAST	-$16,494	-85%
7.3.3 Grid Design and System Hardening	7.3.3.3	Covered conductor installation	-$80,456	-22%
7.3.3 Grid Design and System Hardening	7.3.3.7	Expulsion fuse replacement	-$11,936	-34%
7.3.3 Grid Design and System Hardening	7.3.3.8.2	Grid topology improvements to mitigate or reduce PSPS events, Transmission Line Sectionalizing	-$25,441	-47%
7.3.3 Grid Design and System Hardening	7.3.3.11.1	Mitigation of impact on customers and other residents affected during PSPS event, Generation for PSPS Mitigation	-$11,965	-51%
7.3.3 Grid Design and System Hardening	7.3.3.15	Transmission tower maintenance and replacement	-$88,201	-57%
7.3.3 Grid Design and System Hardening	7.3.3.16	Undergrounding of electric lines and/or equipment	-$204,488	-33%
7.3.3 Grid Design and System Hardening	7.3.3.17.1	Updates to grid topology to minimize risk of ignition in HFTDs, System Hardening, Distribution	-$274,189	-28%
7.3.3 Grid Design and System Hardening	7.3.3.17.2	Updates to grid topology to minimize risk of ignition in HFTDs, System	-$11,195	-59%

		Hardening, Transmission		
7.3.3 Grid Design and System Hardening	7.3.3.17.5	Updates to grid topology to minimize risk of ignition in HFTDs, Remote Grid	-$14,266	-84%
7.3.4 Asset Management and Inspections	7.3.4.8	LiDAR Inspections of Transmission Electric Lines and Equipment	-$6,283	-57%
7.3.5 Vegetation Management and Inspections	7.3.5.3	Detailed inspections and management practices for vegetation clearances around transmission electrical lines and equipment	-$43,337	-55%

3.2.3 Summary of Underspend Instances

The following table summarizes every instance of PG&E's underspending for the 2022 WMP Expense and Capital based on the information provided in PG&E's ARC for 2022 WMP dated March 31, 2023, provided in DRU11694 and additional information and explanation for the Expense and Capital underspent funds provided in DRU11935.

Under the "Funding Discrepancy Amount" column, the IE has noted that for every initiative with an underspend record for Expense or Capital, or both, one of the following statuses for Expense or Capital spending is shown: An underspend, an overspend, or No spend/planned amount.

Under the "Detail on Funding Discrepancy" column, the IE provided detail on the amount of the underspend based on the actual costs PG&E shared, the total planned amount for Expense or Capital, and the percentage of the variance to the total amount initially allocated for the initiative. Additionally, the IE included PG&E's explanations for more than $5M in variances that are a decrease from the 2022 WMP planned budget for the initiative.

Table 50: 2022 WMP Funding Verification Summary

Initiative Category	2022 Initiative Number	Initiative Name	2022 WMP Page No.	Funding Discrepancy Amount	Detail on Funding Discrepancy
7.3.1 Risk Assessment and Mapping	7.3.1.1	A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment	381	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $399.3K of the planned $0.91M, 44% of the total Capital amount initially allocated for this initiative.
7.3.1 Risk Assessment and Mapping	7.3.1.3	Ignition probability mapping showing the probability of ignition along the electric lines and equipment	358	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $399.3K of the planned $0.91M, 44% of the total Capital amount initially allocated for this initiative.
7.3.1 Risk Assessment and Mapping	7.3.1.5	Match drop simulations showing the potential wildfire consequence of ignitions that occur along the electric lines and equipment	364	Expense Underspend: Variance Amount $0M - $1M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $10.9K of the planned $3.2M, 0% of the total Expense amount initially allocated for this initiative. PG&E did not spend $23.9K of the planned $1.19M, 2% of the total Capital amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.1.2	Advanced weather monitoring and weather stations, Fuel Moisture Sampling and Modeling	401	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or	PG&E did not spend $46.3K of the planned $0.6M, 8% of the total Expense amount initially allocated for this initiative.

				spent for this WMP initiative.	
7.3.2 Situational Awareness and Forecasting	7.3.2.1.3	Advanced weather monitoring and weather stations, Weather Stations	374	Expense Overspend Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $556.3K of the planned $6.18M, 9% of the total Capital amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.1.5	Advanced weather monitoring and weather stations, Fire Detection & Alerting	412	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $28.9K of the planned $0.34M, 8% of the total Expense amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.1.6	Advanced weather monitoring and weather stations, Other Meteorology Tools and Upgrades	414	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $619.7K of the planned $1.02M, 61% of the total Expense amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.2.3	Continuous monitoring sensors, Distribution Fault Anticipation Technology and Early Fault Detection	392	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $2.31M of the planned $2.57M, 90% of the total Expense amount initially allocated for this initiative. PG&E did not spend $4.64M of the planned $14.58M, 32% of the total Capital amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.2.5	Continuous monitoring sensors, Line Sensor Devices	401	Expense Overspend Capital Underspend:	PG&E did not spend $5.52M of the planned $7.81M, 71% of the total Capital amount initially allocated for this initiative.

				Variance Amount $5M - $10M	Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.2.2.5_DR_BVNA_024_Q006_R0011, PG&E explained the variance in the Capital Spending as Follows: "The underspend can be attributed to: 1. deferred IT Infrastructure upgrade costs, which were caused by delayed standards approval for line sensor product; and 2. efficiencies from lower installation costs due to optimized routing through concentrating the work in specific geographical divisions. Please note that this IT infrastructure upgrade work was only deferred, not canceled, and we are currently scheduling when this work will be performed." Additionally, PG&E indicated in the DR11935 response that the Capital spend was $2,407 for the effort against the target spend which is greater than the reported $2,291 from PG&E"s 2022 ARC Report.
7.3.2 Situational Awareness and Forecasting	7.3.2.2.7	Continuous monitoring sensors, DTS FAST	437	Expense Underspend: Variance Amount $0M - $1M Capital Underspend: Variance Amount $10M - $20M	PG&E did not spend $4K of the planned $0.6M, 1% of the total Expense amount initially allocated for this initiative. PG&E did not spend $16.49M of the planned $19.45M, 85% of the total Capital amount initially allocated for this initiative.

					Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Decreased program forecast due to budgetary reduction. Program paused transmission efforts in late 2021. In 2022, the program did not receive the required funding necessary to continue efforts to deploy DTS-FAST. In the interim, the program is looking to make the system more scalable and cost effective to deploy."
7.3.2 Situational Awareness and Forecasting	7.3.2.4	Forecast of a fire risk index, fire potential index, or similar	442	Expense Underspend: Variance Amount $0M - $1M Capital Overspend	PG&E did not spend $344.6K of the planned $1.87M, 18% of the total Expense amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.5	Personnel monitoring areas of electric lines and equipment in elevated fire risk conditions	444	Expense Underspend: Variance Amount $0M - $1M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $884.4K of the planned $4.84M, 18% of the total Expense amount initially allocated for this initiative. PG&E did not spend $221.4K of the planned $0.23M, 96% of the total Capital amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.6	Weather forecasting and estimating impacts on electric lines and equipment	448	Expense Underspend: Variance Amount $0M - $1M Capital Underspend:	PG&E did not spend $361.8K of the planned $1.11M, 33% of the total Expense amount initially allocated for this initiative. PG&E did not spend $294.1K of the planned $1.02M, 29% of

				Variance Amount $0M - $1M	the total Capital amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.7	Other, Wildfire Safety Operations Center (WSOC)	450	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $2.71M of the planned $6.98M, 39% of the total Expense amount initially allocated for this initiative. PG&E did not spend $101.4K of the planned $0.12M, 81% of the total Capital amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.2-T	Circuit breaker maintenance and installation to de-energize lines upon detecting a fault, Maintenance Substation Transmission	459	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $219.3K of the planned $2.44M, 9% of the total Expense amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.3	Covered conductor installation	462	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount over $50M	PG&E did not spend $80.46M of the planned $366M, 22% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - favorable unit cost performance from reduction of pre-construction vegetation clearing and implementation of unit price RFP contract strategy"

7.3.3 Grid Design and System Hardening	7.3.3.4	Covered conductor maintenance	469	Expense Overspend Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $4.39M of the planned $44.39M, 10% of the total Capital amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.5	Crossarm maintenance, repair, and replacement	471	Expense Underspend: Variance Amount $1M - $5M Capital Overspend	PG&E did not spend $1.85M of the planned $2.57M, 72% of the total Expense amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.6	Distribution pole replacement and reinforcement, including with composite poles	473	Expense Underspend: Variance Amount $0M - $1M Capital Overspend	PG&E did not spend $97.5K of the planned $3.46M, 3% of the total Expense amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.7	Expulsion fuse replacement	446	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $10M - $20M	PG&E did not spend $11.94M of the planned $35M, 34% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - favorable unit cost performance"
7.3.3 Grid Design and System Hardening	7.3.3.8.2	Grid topology improvements to mitigate or reduce PSPS events, Transmission Line Sectionalizing	454	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $20M - $50M	PG&E did not spend $25.44M of the planned $54.25M, 47% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as

					follows: "Variance mainly driven by: - 2022 forecast showed cost for entire MAT code 94A which includes non-WMP related work; while 2022 Actuals are selecting specific SCADA projects that mitigate PSPS impacts"
7.3.3 Grid Design and System Hardening	7.3.3.8.3	Grid topology improvements to mitigate or reduce PSPS events, Distribution Line Motorized Switch Operator Pilot	457	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $3.84M of the planned $10.45M, 37% of the total Capital amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.10	Maintenance, repair, and replacement of connectors, including hotline clamps	497	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $4.35M of the planned $14.6M, 30% of the total Expense amount initially allocated for this initiative. PG&E did not spend $728.7K of the planned $3.13M, 23% of the total Capital amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.11.1	Mitigation of impact on customers and other residents affected during PSPS event, Generation for PSPS Mitigation	470	Expense Underspend: Variance Amount over $50M Capital Underspend: Variance Amount $10M - $20M	PG&E did not spend $72.1M of the planned $112.69M, 64% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: 1) Temporary generation rental cost - lower due to 2021

					over-accrual adjustment ($19M) and overall rental quantity (# of MWs) 2) Reduced operating costs incurred driven by minimal PSPS activity" PG&E did not spend $11.96M of the planned $23.32M, 51% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Lower spend on CMEP capital projects due to long lead time for capital projects identification and development - Distribution Microgrids PIH: Actual costs lower due to much of work completed prior to 2022, also updated workplan for 4 locations, 3 improvement projects."
7.3.3 Grid Design and System Hardening	7.3.3.11.3	Mitigation of impact on customers and other residents affected during PSPS event, Emergency Back-up Generation – PG&E Service Centers & Materials Distribution Centers	489	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $1.33M of the planned $18M, 7% of the total Capital amount initially allocated for this initiative.

7.3.3 Grid Design and System Hardening	7.3.3.11.4	Fixed Power Solutions	522	Expense Underspend: Variance Amount $5M - $10M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $5.7M of the planned $7.8M, 73% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.3.11.4_DR_BVNA_024_Q001_R001, PG&E explained the variance in the Expense Spending as Follows: "The decrease from the forecast to the actual spend was due to the following factors: 1. the time required to design the programs causing the programs to start later in 2022; 2. the time required to execute the necessary third party contracts causing the program to start later in 2022; 3. delays resulting from global supply chain constraints on materials; and 4. weather-related delays on installation. However, please note that both programs are multi-year efforts and will continue in 2023 and beyond, meaning that although this money was not spent in 2022 it will be spent in future years as we continue to the roll-out of these programs."
7.3.3 Grid Design and System Hardening	7.3.3.12.1	Other corrective action, Distribution Substation	527	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or	PG&E did not spend $140.3K of the planned $0.98M, 14% of the total Expense amount initially allocated for this initiative.

				spent for this WMP initiative.	
7.3.3 Grid Design and System Hardening	7.3.3.12.3	Other corrective action, Maintenance, Transmission	534	Expense Underspend: Variance Amount $20M - $50M Capital Overspend	PG&E did not spend $37.33M of the planned $127.98M, 29% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - reclassification of Bay Towers costs to capital - Lower volume of work for wooden structure (MAT ICW) compared to plan; also unit cost was favorable due to efficiency/savings "
7.3.3 Grid Design and System Hardening	7.3.3.12.4	Other corrective action, Maintenance, Distribution	537	Expense Underspend: Variance Amount $10M - $20M Capital Overspend	PG&E did not spend $11.19M of the planned $93.7M, 12% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.3.12.4_DR_BVNA_024_Q004_R001, PG&E explained the variance in the Expense Spending as Follows: "The majority of the underspend was the result of an inadvertent budgeting error. The budget for this initiative did not reflect all of the assumptions necessary because there was a missing

					line item in the Distribution Maintenance program of approximately $22M, which was not reflected in the initial budgeted amount for this initiative, due to inconsistencies in the master data. The Budget forecasted completing 26.121k units, with a targeted budget unit cost of $2.3k per unit (totaling approximately $59.M). However, the actual units completed were 19.353k, with an actual unit cost of $2.8k per unit (totaling approximately $53.2M). Additionally, there was a higher find rate of B tags in the non-HFTD areas of our territory, which impacted the execution of work in the HFTD areas. Please note that there were no quantitative or qualitative targets set for this work in our 2022 WMP."
7.3.3 Grid Design and System Hardening	7.3.3.13	Pole loading infrastructure hardening and replacement program based on pole loading assessment program	543	Expense Underspend: Variance Amount $0M - $1M Capital Overspend	PG&E did not spend $154.5K of the planned $0.15M, 100% of the total Expense amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.14	Transformers maintenance and replacement	546	Expense Underspend: Variance Amount $0M - $1M Capital Overspend	PG&E did not spend $673.8K of the planned $1.34M, 50% of the total Expense amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.15	Transmission tower maintenance and replacement	549	Expense Overspend Capital Underspend:	PG&E did not spend $88.2M of the planned $154.98M, 57% of the total Capital amount initially allocated for this

				Variance Amount over $50M	initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - anticipated delays in the work scheduled due to permitting and access constraints for multiple Ignacio-Mare Island (230kV) tower replacements. - Underrun driven due to favorability vs original job estimate from successful contract negotiations on Lammers-Kasson (115kV) and SF Martin (115kV) Projects. - Project deferrals due to funding constraints"
7.3.3 Grid Design and System Hardening	7.3.3.16	Undergrounding of electric lines and/or equipment	523	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount over $50M	PG&E did not spend $204.49M of the planned $611.25M, 33% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - timing variance of readiness budget for our 2023 UG portfolio of projects. The forecast for scoping, estimating/design, permitting, and pre-construction of 2023 projects (costs which would be incurred in 2022) did not materialize as initially forecasted."

7.3.3 Grid Design and System Hardening	7.3.3.17.1	Updates to grid topology to minimize risk of ignition in HFTDs, System Hardening, Distribution	537	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount over $50M	PG&E did not spend $274.19M of the planned $977.25M, 28% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Covered conductor installation - favorable unit cost performance from reduction of pre-construction vegetation clearing and implementation of unit price RFP contract strategy - Undergrounding program - timing variance of readiness budget for our 2023 UG portfolio of projects. The forecast for scoping, estimating/design, permitting, and pre-construction of 2023 projects (costs which would be incurred in 2022) did not materialize as initially forecasted."
7.3.3 Grid Design and System Hardening	7.3.3.17.2	Updates to grid topology to minimize risk of ignition in HFTDs, System Hardening, Transmission	629	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $10M - $20M	PG&E did not spend $11.2M of the planned $19.05M, 59% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Actuals lower due to updated

					planned transmission system hardening projects to be completed in 2022; in addition forecast was reduced to exclude idle line removal costs which are disallowed for recovery."
7.3.3 Grid Design and System Hardening	7.3.3.17.5	Updates to grid topology to minimize risk of ignition in HFTDs, Remote Grid	558	Expense Underspend: Variance Amount $10M - $20M Capital Underspend: Variance Amount $10M - $20M	PG&E did not spend $12.8M of the planned $14.82M, 86% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - PG&E did not complete any Line Elimination Incentive Program (LEIP) projects. This was due to fewer than expected new opportunities for the LEIP and to opportunities pursued where PG&E could not reach mutual agreement to discontinue electric service." PG&E did not spend $14.27M of the planned $17M, 84% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - lower than forecasted

					number of remote grid capital projects completed"
7.3.4 Asset Management and Inspections	7.3.4.1	Detailed inspections of distribution electric lines and equipment	569	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $2.08M of the planned $100.38M, 2% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.2	Detailed inspections of transmission electric lines and equipment	574	Expense Underspend: Variance Amount $10M - $20M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $18.38M of the planned $86.71M, 21% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Favorable unit cost - Aerial Inspection (BF2) desktop review contract updated with favorable rates."
7.3.4 Asset Management and Inspections	7.3.4.4	Infrared inspections of distribution electric lines and equipment	582	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $238K of the planned $2.23M, 11% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.6.1	Intrusive pole inspections, Distribution	633	Expense Underspend: Variance Amount $0M - $1M No Capital amount	PG&E did not spend $685.8K of the planned $21.24M, 3% of the total Expense amount initially allocated for this initiative.

				was planned or spent for this WMP initiative.	
7.3.4 Asset Management and Inspections	7.3.4.6.2	Intrusive pole inspections, Transmission	636	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $455.8K of the planned $2.15M, 21% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.7	LiDAR Inspections of Distribution Electric Lines and Equipment	639	Expense Underspend: Variance Amount $1M - $5M Capital Overspend	PG&E did not spend $2.04M of the planned $10.5M, 19% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.8	LiDAR Inspections of Transmission Electric Lines and Equipment	643	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $5M - $10M	PG&E did not spend $1.29M of the planned $5.03M, 26% of the total Expense amount initially allocated for this initiative. PG&E did not spend $6.28M of the planned $11M, 57% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.4.8_DR_BVNA_024_Q005_R001, PG&E explained the variance in the Expense and Capital Spending as Follows: "The reduction of dollars ($4,252M) spent against the original forecast ($11,003M) for initiative 7.3.4.8 was the result of shifting these funds to higher priority LiDAR-based

					work that would achieve increased wildfire risk reduction. Specifically, the non-HFTD scope of work that was originally included in this initiative was removed in order to prioritize HFTD LiDAR modeling work for electrical clearance evaluation. This prioritized work spent $6.751M in 2022 and continues into 2023 as described in 2023 WMP Section 8.1.3.1.8. Additionally, please note that there were no quantitative or qualitative targets set for this work in our 2022 WMP."
7.3.4 Asset Management and Inspections	7.3.4.10	Other discretionary inspection of transmission electric lines and equipment, beyond inspections mandated by rules and regulations	650	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $4.3M of the planned $4.3M, 100% of the total Expense amount initially allocated for this initiative. PG&E did not spend $2.58M of the planned $3.7M, 70% of the total Capital amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.12	Patrol inspections of transmission electric lines and equipment	657	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $34.2K of the planned $0.08M, 41% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.13	Pole loading assessment program to determine safety factor	660	Expense Underspend: Variance Amount $0M - $1M	PG&E did not spend $170.6K of the planned $9.12M, 2% of the total Expense amount initially allocated for this initiative.

				No Capital amount was planned or spent for this WMP initiative.	
7.3.4 Asset Management and Inspections	7.3.4.15-D	Substation inspections, Enhanced Distribution, Substation	668	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $1.44M of the planned $4.4M, 33% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.15-T	Substation inspections, Enhanced Transmission, Substation	668	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $17.1K of the planned $1.76M, 1% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.16	Other, Substation inspections, Generation	628	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $105.3K of the planned $1.14M, 9% of the total Expense amount initially allocated for this initiative.
7.3.5 Vegetation Management and Inspections	7.3.5.2	Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment	634	Expense Underspend: Variance Amount $20M - $50M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $32.63M of the planned $1370.79M, 2% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.5.2_DR_BVNA_024_Q

					007_R001, PG&E explained the variance in the Expense Spending as Follows: "The primary driver of the expense underspend was due to reduced unit costs in the EVM program, partially offset by higher costs in the Routine Program: EVM: The spend was less than the forecast, which is attributable to both a lower volume and complexity of tree work and our ability to successfully work trees at a lower average unit cost, than predicted in the initial forecast model. Routine Distribution: the spend was greater than forecast due to 2021 under accrual (costs associated with the prior year's costs that were not included in that year's costs, ~$20M), schedule acceleration costs (~$18M), and higher average unit costs, partly offset by reduced volume of completed units. Tree Mortality (First Patrol): The spend was less than forecast, which was primarily driven by the cessation of recording incremental costs for completed Dead & Dying units identified on Routine patrols (first patrol). The Tree Mortality program was originally targeted to address the impact of increased volumes of dead and dying trees and was funded separately through the CEMA

					recovery mechanism. Under this mechanism the incremental costs of these first patrol units were creditable to the Tree Mortality Program. In 2022, the Tree Mortality program funding is consistent with the other vegetation management programs (i.e., the GRC rate case) and consequently costs for these units were not transferred to the Tree Mortality program. The 2022 Tree Mortality plan for costs and units did not anticipate this change and was not adjusted to remove these anticipated costs and units."
7.3.5 Vegetation Management and Inspections	7.3.5.3	Detailed inspections and management practices for vegetation clearances around transmission electrical lines and equipment	729	Expense Overspend Capital Underspend: Variance Amount $20M - $50M	PG&E did not spend $43.34M of the planned $78.7M, 55% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Due to budget/financial constraints, some Right-of-Way work was deferred to 2023"
7.3.5 Vegetation Management and Inspections	7.3.5.6	Improvement of inspections	739	Expense Underspend: Variance Amount over $50M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $74.34M of the planned $143.14M, 52% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022

					provided in DRU11694 as follows: "Variance mainly driven by: - Due to change in QC commitment, funding was reprioritized for higher risk work. Team finished 2021 commitment in 2022 ('21 VM Tree work was completed in the following year), did QC sampling, field quality assessments and quality assurance work. - Staffing levels for both internal and external work verifications were lower than forecasted combined with contractor conversions and efficiencies leading to reduced spend."
7.3.5 Vegetation Management and Inspections	7.3.5.7	Remote sensing inspections of vegetation around distribution electric lines and equipment	655	Expense Underspend: Variance Amount $20M - $50M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $33.45M of the planned $37.09M, 90% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Significant reduction in Ground based LiDAR scope due to the WMP commitment of 2k miles vs. potential opportunity to collect ~49% of HFTD spans. Re-flight/ aerial collection of data was de-scoped. WMP forecasted spend followed a 6AOI allocation based on an anticipate level of programmatic support."

7.3.5 Vegetation Management and Inspections	7.3.5.8	Remote sensing inspections of vegetation around transmission electric lines and equipment	658	Expense Underspend: Variance Amount $5M - $10M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $5.23M of the planned $13M, 40% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.5.8_DR_BVNA_024_Q003_R001, PG&E explained the variance in the Expense Spending as Follows: "- The 2022 target spend of $13M included $10.5M for primary LiDAR contract and $2.5M for hyperspectral data collection work. - A budgeting error was made due to the seasonal nature of the work since it does not precisely correspond with a specific calendar year. The primary LiDAR contract of $10.5M started in August 2021 and ended in November 2022. Approximately $5.5M of the spend was in 2021 and $5M was in 2022. The 2023 LiDAR contract started in December 2022 with $2.8M of related spend in 2022. Therefore in 2022, the total spend was approximately $7.8M (approximately $5M for the 2022 contract and approximately $2.8M for the 2023 contract). Thus, the spending for the 2021-2022 work season totaled $10.5M, while the total spending for the 2022 calendar year totaled $7.8M.

					- In 2022, we removed the $2.5M hyperspectral data collection work form our 2022 contract. This data collection identifies tree species to further support targeted vegetation management. We reduced this scope of work because we determined it was more efficient use of resources to use historical data instead of the hyperspectral data. The reduction in scope did not impact our primary routine compliance detections."
7.3.5 Vegetation Management and Inspections	7.3.5.18.2	Substation vegetation management, Maintenance substation transmission	799	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $389.1K of the planned $1.25M, 31% of the total Expense amount initially allocated for this initiative.
7.3.5 Vegetation Management and Inspections	7.3.5.19	Vegetation management system	803	Expense Underspend: Variance Amount over $50M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $71.14M of the planned $92.52M, 77% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "VM team provide update on 3/29 pm: - ~$75M of the forecast was earmarked to help with a transition away from EVM at the beginning of 2022. This was intended to revisit procedures, update trainings

					and work on lessons learned. However, the EVM program continued on through 2022, so these money was reallocated back to the EVM program."
7.3.5 Vegetation Management and Inspections	7.3.5.20	Additional vegetation management practices beyond regulatory requirements and recommendations	699	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $3.44M of the planned $32.35M, 11% of the total Expense amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.2	Crew-accompanying ignition prevention and suppression resources and services	814	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $2.65M of the planned $14.52M, 18% of the total Expense amount initially allocated for this initiative. PG&E did not spend $664.3K of the planned $0.69M, 96% of the total Capital amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.3	Personnel work procedures and training in conditions of elevated fire risk	817	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $191.6K of the planned $1M, 19% of the total Expense amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.4-D	Protocols for PSPS re-energization, Distribution	820	Expense Underspend: Variance Amount $0M - $1M Capital Underspend:	PG&E did not spend $820.8K of the planned $10.09M, 8% of the total Expense amount initially allocated for this initiative. PG&E did not spend $3.65M of the planned $4.94M, 74% of

				Variance Amount $1M - $5M	the total Capital amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.4-T	Protocols for PSPS re-energization, Transmission	820	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $1.56M of the planned $2M, 78% of the total Expense amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.5-D	PSPS events and mitigation of PSPS impacts , Distribution	825	Expense Underspend: Variance Amount over $50M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $68.81M of the planned $68.81M, 100% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - PSPS events did not happen as weather conditions was more favorable in 2022"
7.3.6 Grid Operations and Protocols	7.3.6.5-T	PSPS events and mitigation of PSPS impacts , Transmission	825	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $1.8M of the planned $1.81M, 100% of the total Expense amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.6	Stationed and on-call ignition prevention and suppression resources and services	828	Expense Underspend: Variance Amount $1M - $5M Capital	PG&E did not spend $4.05M of the planned $4.84M, 84% of the total Expense amount initially allocated for this initiative.

				Underspend: Variance Amount $0M - $1M	PG&E did not spend $228.3K of the planned $0.23M, 99% of the total Capital amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.7	Other, Aviation Support	831	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $3.57M of the planned $6.14M, 58% of the total Expense amount initially allocated for this initiative. PG&E did not spend $361.5K of the planned $0.33M, 111% of the total Capital amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.8	Protective equipment and device settings	730	Expense Underspend: Variance Amount over $50M Capital Overspend	PG&E did not spend $59.7M of the planned $142.59M, 42% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - EPSS Patrol lower than planned primarily due to improvements/efficiencies made by the EPSS program (e.g., daily EPSS enablement/disablement based on wildfire risk and installing fault indicators to narrow down circuit area for outage patrol)"
7.3.7 Data Governance	7.3.7.2	Collaborative research on utility ignition and/or wildfire	880	Expense Underspend: Variance Amount $0M - $1M	PG&E did not spend $570.3K of the planned $0.87M, 66% of the total Expense amount initially allocated for this initiative.

				No Capital amount was planned or spent for this WMP initiative.	
7.3.7 Data Governance	7.3.7.5	Other, IT projects to support wildfire mitigation work	897	Expense Underspend: Variance Amount $1M - $5M Capital Overspend	PG&E did not spend $1.04M of the planned $45.1M, 2% of the total Expense amount initially allocated for this initiative.
7.3.8 Resource Allocation Methodology	7.3.8.1	Allocation methodology development and application	905	Expense Underspend: Variance Amount $1M - $5M Capital Overspend	PG&E did not spend $2.22M of the planned $3.49M, 64% of the total Expense amount initially allocated for this initiative.
7.3.8 Resource Allocation Methodology	7.3.8.2	Risk reduction scenario development and analysis	909	Expense No Variance Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $399.3K of the planned $0.91M, 44% of the total Capital amount initially allocated for this initiative.
7.3.9 Emergency Planning & Preparedness	7.3.9.1	Adequate and trained workforce for service restoration	915	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $388.6K of the planned $7.67M, 5% of the total Expense amount initially allocated for this initiative.
7.3.9 Emergency Planning & Preparedness	7.3.9.2	Community outreach, public awareness, and communications efforts	919	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $4.58M of the planned $21.74M, 21% of the total Expense amount initially allocated for this initiative.

7.3.9 Emergency Planning & Preparedness	7.3.9.3	Customer support in emergencies	924	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $1.13M of the planned $3.41M, 33% of the total Expense amount initially allocated for this initiative.
7.3.9 Emergency Planning & Preparedness	7.3.9.4	Disaster and emergency preparedness plan	931	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $2.13M of the planned $6.84M, 31% of the total Expense amount initially allocated for this initiative.
7.3.9 Emergency Planning & Preparedness	7.3.9.5	Preparedness and planning for service restoration	934	Expense Underspend: Variance Amount $5M - $10M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $5.44M of the planned $15.79M, 34% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.9.5_DR_BVNA_024_Q002_R001, PG&E explained the variance in the Expense Spending as Follows: "Sixty-five helicopters were budgeted as part of the exclusive use contract that was scheduled to support Public Safety Power Shutoff (PSPS). however, as there were no PSPS events in 2022, the flight hours ended up fewer than planned which caused the underspend. Please note that there were not quantitative or qualitative

					targets set for this work in our 2022 WMP."
7.3.10 Stakeholder Cooperation & Community Engagement	7.3.10.1	Community engagement	812	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $4.27M of the planned $20.62M, 21% of the total Expense amount initially allocated for this initiative.
7.3.10 Stakeholder Cooperation & Community Engagement	7.3.10.2	Cooperation and best practice sharing with agencies outside CA	972	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $13.6K of the planned $0.19M, 7% of the total Expense amount initially allocated for this initiative.
7.3.10 Stakeholder Cooperation & Community Engagement	7.3.10.4	Forest service and fuel reduction cooperation and joint roadmap	979	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $2.03M of the planned $5.13M, 40% of the total Expense amount initially allocated for this initiative.

3.3 Verification of QA/QC Programs

Pursuant to the Final IE Scope of Work for the Review of Compliance with 2022 WMP, PG&E provided a complete list of all 2022 WMP activities with corresponding quality assurance and quality control (QA/QC) programs per DRU11689 Response. The QA/QC programs for 2022 WMP activities were assessed within this section through review of documentation and are presented below in Table 51.

PG&E has identified three (3) types of QA/QC programs implemented within the 2022 WMP as provided in PG&E's response DRU11689 Response within Attachment DRU11689_IE_WSD-22_DR_OEIS_Q001_R001 and described further in excerpts below.

Embedded QA and QC: "This work is generally performed within the program's internal process at the individual WMP program level or downstream of the program level. There is some level of established internal QA and QC to validate accurate and timely work completion of WMP activities through field and back-end quality spot checks of work."

Community Wildfire Safety Program (CWSP) Program Management Office (PMO) QC: "PG&E's CWSP PMO team is responsible for monitoring and reporting on the progress of the 54 WMP defined initiatives. The CWSP PMO ensures completion of the 54 initiatives is documented with traceable, verifiable, and complete records."

Electric Safety & Quality Management (ES&QM): "The mission of Electric Operations Quality Management (QM) is to be a trusted source of quality intelligence and a catalyst inspiring a culture of excellence. This group is split into Quality Verification (QV), Quality Assurance (QA), and a Safety PMO."

Table 51: 2022 QA/QC Initiative Verification Summary Table

Initiative Name	Initiative Validation	Finding	QA/QC Program Type
7.3.1.3 - A.01 - Distribution Modeling Enhancements - Equipment Failure and Contact From Object	▪ Documented in PG&E's Confidential Response in DRU11553 in Attachment 35.4 DRU11553_Q01_Atch03_2022 WMP-A.01-DistributionModeling-Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.1.3 - A.02 - Transmission Modeling Enhancements -	▪ Documented in PG&E's Confidential Response in DRU11554 in Attachment 38.4 DRU11554_Q01_Atch03_2022	Activity Validated	Embedded QAQC, WMP PMO QC

Threat and Hazard Risk Drivers	WMP-A.02-TransmissionModeling-Define_CONF		
7.3.1.4 - A.03 - PSPS Consequence Model	▪ Documented in PG&E's Confidential Response in DRU11555 in Attachment 36.3 DRU11555_Q01_Atch03_2022 WMP-A.03-PSPS Consequence Model-Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.1.5 - A.04 - Wildfire Consequence Model Enhancements - Ingress/Egress	▪ Documented in PG&E's Confidential Response in DRU11560 in Attachment 37.4 DRU11560_Q01_Atch03_2022 WMP-A.04-WCME-Ingress Egress-Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.1.5 - A.05 - Wildfire Consequence Model Enhancements - Resistance to Control	▪ Documented in PG&E's Confidential Response in DRU11562 in Attachment 40.4 DRU11562_Q01_Atch03_2022 WMP-A.05-WCME-ResistancetoControl-Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.2.1.1 - B.01 - FPI and IPW Modeling - Revision Evaluation	▪ Documented in PG&E's Confidential Response in DRU11564 in Attachment 41.5 DRU11564_Q01_Atch04_2022_ WMP_B.01_FPI_IPW_Evaluation_Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.2.1.3 - B.02 - Weather Stations - Installations and Optimizations	▪ Documented in PG&E's Confidential Response in DRU11551 in Attachment 30.3 DRU11551_Q01_Atch02_2022 WMP_B.02_Weather Stations_Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.2.1.4 - B.03 - High-Definition Cameras - Installations	▪ Documented in PG&E's Confidential Response in DRU11552 in Attachment 24.3 DRU11552_ Q01_Atch02_2022_WMP_B.03_HD_Cameras_Define_CONF	Activity Validated	WMP PMO QC
7.3.2.2.3 - B.04 - Distribution Fault Anticipation (DFA) - Installations	▪ Per PG&E's provided documents per DRU-11568 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.2.2.3 - B.05 - Early Fault	▪ Per PG&E's provided documents per DRU-11568 Response.	Activity Validated	Embedded QAQC, WMP PMO QC

Detection (EFD) - Installations			
7.3.2.2.5 - B.06 - Line Sensor - Installations	▪ Per PG&E's provided documents per DRU-11568 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.3.7 - C.01 - Expulsion Fuse - Removal	▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 26.3 DRU11572_Q01_Atch02_C.01. QA Pass_CONF ▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 26.4 DRU11572_Q01_Atch03_C.01 Completed Job Package_CONF ▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 26.5 DRU11572_Q01_Atch04_2022 WMP-C.01-Expulsion Fuse-Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.3.8.1 - C.02 - Distribution Sectionalizing Devices - Install and SCADA commission	▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 28.3 DRU11572_Q02_Atch02_C.02 QA Pass_CONF ▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 28.4 DRU11572_Q02_Atch03_C.02 Completed Job Package_CONF ▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 28.5 DRU11572_Q02_Atch04_C.02 SCADA Released Letter_CONF ▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 28.6 DRU11572_Q02_Atch05_2022 WMP-C.02-Distribution Sectionalizing Devices-Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.3.8.2 - C.03 - Transmission Line Sectionalizing - Install and SCADA commission	▪ Per PG&E's provided documents per DRU-11572 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.3.8.3 - C.04 - Distribution Line Motorized Switch	▪ Per PG&E's provided documents per DRU-11572 Response.	Activity Validated	Embedded QAQC, WMP PMO QC

Operator (MSO) - Replacements			
7.3.3.9.1 - C.05 - SCADA Recloser Equipment - Installations	▪ Per PG&E's provided documents per DRU-11572 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.3.9.2 - C.06 - Fuse Savers (Single Phase Reclosers) - Installations	▪ Per PG&E's provided documents per DRU-11572 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.3.11.1 - C.07 - Temporary Distribution Microgrids	▪ Per PG&E's provided documents per DRU-11572 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.3.11.2 - C.08 - Rincon Transformer Fuse - Replacement	▪ Per PG&E's provided documents per DRU-11572 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.3.11.3 - C.09 - Emergency Back-up Generation – Equip PG&E Service Centers & Materials Distribution Centers	▪ Per PG&E's provided documents per DRU-11572 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.3.16 - C.10 - 10K Undergrounding	▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 33.5 DRU11572_Q010_Atch04_ 2022_WMP_C.10_10K_UG_Define_CONF ▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 33.6 DRU11572_Q010_Atch05_QA_QC_Example_31066255_DIAMOND_SPRINGS_1A_EL_DORADO_CTY_R20A_1_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.3.17.1 - C.11 - System Hardening - Distribution	▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 34.3 DRU11572_Q011_Atch02_ 2022_WMP_C.11_SH_Distribution _Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC

	▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 34.4 DRU11572_Q011_Atch03_QA_QC_Example_31066255_DIAMOND_SPRINGS_1A_EL_DORADO_CTY_R20A_1_CONF		
7.3.3.17.2 - C.12 - System Hardening - Transmission	▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 44.8 DRU11572_Q012_Atch07_ 2022_WMP_C.12_SH_Transmission_Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.3.17.3 - C.13 - Surge Arrester - Removals	▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 27.3 DRU11572_Q013_Atch02_118790878_Complete+QA_CONF ▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 27.4 DRU11572_Q013_Atch03_2022 WMP-C.13- Surge Arrester-Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.3.17.5 - C.14 - Remote Grid - Operate New SPS Units	▪ Per PG&E's provided documents per DRU-11572 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.3.17.6 - C.15 - Butte County Rebuild - Undergrounding	▪ Documented in PG&E's Confidential Response in DRU11572 in Attachment 45.4 DRU11572_Q015_Atch05_2022 WMP-C.15-ButteCountyUG_Final-Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.4.1 - D.01 - Detailed Inspections - Distribution	▪ Per PG&E's provided documents per DRU-11575 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.4.2 - D.02 - Detailed Inspection Transmission – Ground	▪ Per PG&E's provided documents per DRU-11575 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.4.2 - D.03 - Detailed Inspection Transmission – Climbing	▪ Per PG&E's provided documents per DRU-11575 Response.	Activity Validated	Embedded QAQC, WMP PMO QC

7.3.4.2 - D.04 - Detailed Inspection Transmission – Aerial	▪ Per PG&E's provided documents per DRU-11575 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.4.4 - D.05 - Infrared Inspections - Distribution	▪ Documented in PG&E's Confidential Response in DRU11575 in Attachment DRU11575_Q05_Atch02_2022 WMP Target Validation D.05 – Infrared Inspections - Distribution_CONF	Activity Validated	WMP PMO QC
7.3.4.15 - D.06 - Supplemental Inspections - Substation Distribution	▪ Per PG&E's provided documents per DRU-11575 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.4.15 - D.07 - Supplemental Inspections - Substation Transmission	▪ Per PG&E's provided documents per DRU-11575 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.4.16 - D.08 - Supplemental Inspections - Hydroelectric Substations and Powerhouses	▪ Per PG&E's provided documents per DRU-11575 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.4.14 - D.09 - Asset Inspections - Quality Assurance	▪ Documented in PG&E's Confidential Response in DRU11575 in Attachment 48.8 DRU11575_Q09_Atch07_2022 WMP-D.09-Asset Inspections-QA-Define_CONF ▪ Documented in PG&E's Confidential Response in DRU11575 in Attachment 48.6 DRU11575_Q09_Atch05_RISK-6301P-12_Electric Quality Verification Distribution Audit Procedure_CONF ▪ Documented in PG&E's Confidential Response in DRU11575 in Attachment 48.7 DRU11575_Q09_Atch06_RISK-6301P-13_Quality Verification Transmission Audit Procedure_CONF	Activity Validated	WMP PMO QC, Electric Operations Quality Management
7.3.4.17 - D.10 - HFTD/HFRA Open	▪ Per PG&E's provided documents per DRU-11575 Response.	Activity Validated	Embedded QAQC, WMP PMO QC

Tag Reduction - Distribution			
7.3.4.17 - D.11 - HFTD/HFRA Open Tag Reduction - Transmission	▪ Per PG&E's provided documents per DRU-11575 Response.	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.5.2 - E.01 - Enhanced Vegetation Management	▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment 31.4 DRU11578_Q01_Atch03_2022 WMP-E.01-EVM-Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.5.2 - E.02 - Pole Clearing Program	▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment DRU11578_Q02_Atch03_2022 WMP-E.02 Pole Clearing_Define_CONF	Activity Validated	WMP PMO QC
7.3.5.7 - E.03 - LiDAR Ground Inspections - Distribution	▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment DRU11578_Q03_Atch03_VMDR1976_ATT1_SOW CWA C44690 Cyclomedia 3.29.2022_CONF ▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment DRU11578_Q03_Atch04_VMDR1976_N003_2_GeographicalMap_CONF ▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment DRU11578_Q03_Atch05_2022 WMP-E.03-LiDAR Ground_Dist_Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.5.8 - E.04 - LiDAR Routine Inspections - Transmission	▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment DRU11578_Q04_Atch03_2022 WMP E.04 LiDAR Routine Inspection_Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.5.13 - E.05 - Vegetation Management - Quality Assurance and Quality Verification	▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment DRU11578_Q05_Atch09_2022 WMP-E.05-Veg Mgmt-QA Define_CONF	Activity Validated	WMP PMO QC, Electric Operations Quality Management
7.3.5.17.1 - E.06 - Defensible Space Inspections -	▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment DRU11578_Q06_Atch02_2022 WMP-	Activity Validated	Embedded QAQC, WMP PMO QC

Distribution Substation	E.06 Defensible Space Distribution Subs-Define_CONF ▪ Documented in PG&E's Response in DRU11578 in Attachment DRU11578_Q06_Atch03_Substation Def Sp Inspection 2022 Completion List_Distribution ▪ Documented in PG&E's Response in DRU11578 in Attachment DRU11578_Q06_Atch04_Sample Inspection Form DS_CYCLE 1 MAINTENANCE_WORK ORDER FORM_HIGGINS_20220411 ▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment DRU11578_Q06_Atch05_Sample Mitigation Form DS_HFTD SUBSTATIONS_PI FORM_HIGGINS_20211124_CONF		
7.3.5.17.2 - E.07 - Defensible Space Inspections - Transmission Substation	▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment 46.4 DRU11578_Q07_Atch03_Def.Space Insp_TransmissionSub_Define_CONF ▪ Documented in PG&E's Response in DRU11578 in Attachment 46.2 DRU11578_Audit_IE_WSD-022_E.07-7.3.5.17.2_DR_BVNA_019_Q007_R001	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.5.17.3 - E.08 - Defensible Space Inspections - Hydroelectric Substations and Powerhouses	▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment 42.4 DRU11578_Q08_Atch03_Def.Space Insp_Powerhouses_Define_CONF ▪ Documented in PG&E's response in DRU11578 in Attachment 42.2 DRU11578_Audit_IE_WSD-022_E.08-7.3.5.17.3_DR_BVNA_019_Q008_R001	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.5.20 - E.09 - Utility Defensible Space - Distribution	▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment 29.3 DRU11578_009_Atch02_Embedded QA_QC _CONF ▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment 29.4 DRU11578_009_Atch03-UDS-Distribution-Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC

7.3.5.2 - E.10 - Pole Clearing - per PRC 4292 in State Responsibility Areas (SRA)	▪ Documented in PG&E's Confidential Response in DRU11578 in Attachment 39.3 DRU11578_0010_Atch02_2022 WMP Validation E.10 Pole Clearing Define_CONF	Activity Validated	WMP PMO QC
7.3.6.8 - F.01 - EPSS - Settings Design and Test	▪ Documented in PG&E's Confidential Response in DRU11581 in Attachment 50.3 DRU11581_Q01_Atch02_2022 WMP-F.01 EPSS Settings Design and Test-Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.6.8 - F.02 - EPSS - Install Settings on Distribution Line devices	▪ Documented in PG&E's Confidential Response in DRU11581 in attachment DRU1581_Q02_Atch02_2022 WMP-F.02 EPSS Install Setting on Distribution Line Devices-Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.6.8 - F.03 - EPSS - Develop Enablement Standards and Procedures	▪ Documented in PG&E's Confidential Response in DRU11581 in Attachment 49.7 DRU11581_Q03_Atch06_2022 WMP-F.03 EPSS Develop Standards-Define_CONF	Activity Validated	Embedded QAQC, CWSP PMO QC
7.3.6.8 - F.04 - EPSS - Reliability Improvements	▪ Documented in PG&E's Confidential Response in DRU11581 in Attachment 51.1.7 DRU11581_Q04_Atch06_2022 WMP-F.04 EPSS Reliability Improvements-Define_CONF	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.7.1 - G.01 - Data Governance - Identify and Centralize High Priority Data	▪ Documented in PG&E's Confidential Response in DRU11583 in Attachment 47.5 DRU11583_Q01_Atch04_G.01-DataGovernance_Define_CONF ▪ Documented in PG&E's Response in DRU11583 in Attachment 47.4 DRU11583_Q01_Atch03_Foundry_Ontology_Tracker_03.29.2023	Activity Validated	Embedded QAQC, WMP PMO QC
7.3.8.3 - H.01 - Risk Spend Efficiency - Develop and Share Governance Process	▪ Documented in PG&E's Confidential Response in DRU11584 in Attachment 43.3 DRU11584_Q01_Atch02_PGE Risk Spend Efficiency (RSE) Governance 20220920_CONF ▪ Documented in PG&E's Confidential Response in DRU11584 in Attachment 43.4 DRU11584_Q01_Atch03_2022	Activity Validated	Embedded QAQC, WMP PMO QC

	WMP-H.01-Risk Spend Efficiency-Define_CONF		
7.3.10.1 - J.01 - Community Engagement - Meetings	▪ Per PG&E's provided documents per DRU-11585 Response.	Activity Validated	Embedded QAQC, WMP PMO QC

4. CONCLUSION

Per the IE Findings in Appendix F, PG&E has completed non-qualitative and has ongoing qualitative initiatives for the WMP programs outlined in the PG&E approved 2022 WMP. For documented evidence for each initiative detailed within Appendix F, see detailed descriptions and references located within Sections 3.1.2, 3.1.3, 3.1.4, 3.1.5, 3.2, and 3.3 herein.

APPENDICES

APPENDICES

Appendix A - List of 2022 WMP Activities

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
WMP Activity Completion	d. Qualitative Goal/Target	Risk Assessment and Mapping	7.3.1.3	A.01	Distribution Modeling Enhancements - Equipment Failure and Contact From Object	Develop additional Distribution Equipment Failure (EFF) and Distribution Contact From Object (CFO) sub-models. Conduct assessment to determine whether newly developed sub-models should be included in the WDRM model.
WMP Activity Completion	d. Qualitative Goal/Target	Risk Assessment and Mapping	7.3.1.3	A.02	Transmission Modeling Enhancements - Threat and Hazard Risk Drivers	Develop Threat and Hazard (Risk drivers) sub-models that cover: Threats (e.g., Atmospheric corrosion, Underground corrosion, Fatigue, Mechanical Wear, Decay, Contamination, Vibration), and Hazards (primarily Wind). Conduct assessment to determine whether newly developed sub-models are to be included in the WTRM model.
WMP Activity Completion	d. Qualitative Goal/Target	Risk Assessment and Mapping	7.3.1.4	A.03	PSPS Consequence Model	Conduct an assessment of the PSPS Consequence model to inform if it is fit for use to inform PSPS mitigation plans to minimize customer impact.
WMP Activity Completion	d. Qualitative Goal/Target	Risk Assessment and Mapping	7.3.1.5	A.04	Wildfire Consequence Model Enhancements - Ingress/Egress	Develop an approach on how to incorporate ingress/egress into the Wildfire Consequence Model.

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
WMP Activity Completion	d. Qualitative Goal/Target	Risk Assessment and Mapping	7.3.1.5	A.05	Wildfire Consequence Model Enhancements - Resistance to Control	Evaluate an approach to incorporate "Resistance to Control" (i.e., TDI) into the Wildfire Consequence Model. Resistance to Control is the relative difficulty of constructing and holding a control line as affected by resistance to line construction and by fire behavior.
WMP Activity Completion	d. Qualitative Goal/Target	Situational Awareness and Forecasting	7.3.2.1.1	B.01	FPI and IPW Modeling - Revision Evaluation	Evaluate running the FPI and IPW Models with the ensemble mean output of the POMMS-EPS.
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Situational Awareness and Forecasting	7.3.2.1.3	B.02	Weather Stations - Installations and Optimizations	Install or Optimize 100 weather stations. A unit is deemed "installed" when it is in service and verified as operating when initially installed. A unit is deemed "optimized" when a weather station is moved from an existing location to a new location for the purposes of improving our understanding of the weather conditions in the area.
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Situational Awareness and Forecasting	7.3.2.1.4	B.03	High-Definition Cameras - Installations	Install 98 new cameras that are facing HFTD Tier 2 or Tier 3 viewsheds. In the case a site is destroyed and a camera can be replaced / relocated nearby with a different visual coverage than the original, this will count as a new installation.

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Situational Awareness and Forecasting	7.3.2.2.3	B.04	Distribution Fault Anticipation (DFA) - Installations	Install 40 Distribution Fault Anticipation (DFA) sensors on circuits feeding into HFTD areas or HFRA. One sensor per circuit at initiating substation.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Situational Awareness and Forecasting	7.3.2.2.3	B.05	Early Fault Detection (EFD) - Installations	Install Early Fault Detection (EFD) sensors on 2 circuits feeding into HFTD areas or HFRA.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Situational Awareness and Forecasting	7.3.2.2.5	B.06	Line Sensor - Installations	Install Line Sensor devices on 40 circuits feeding into HFTD areas or HFRA to cover mainline and major tap lines in areas meeting minimum load requirements and within cellular coverage areas to provide visibility.

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Grid Design and System Hardening	7.3.3.7	C.01	Expulsion Fuse - Removal	Remove 3,000 non-exempt fuses/ cutouts identified on distribution poles in HFTD areas or HFRA.
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Grid Design and System Hardening	7.3.3.8.1	C.02	Distribution Sectionalizing Devices - Install and SCADA commission	Install and SCADA commission 100 new PSPS SCADA enabled Distribution Sectionalizing devices.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design and System Hardening	7.3.3.8.2	C.03	Transmission Line Sectionalizing - Install and SCADA commission	Install and SCADA commission 15 transmission line switches on lines that traverse the HFTD areas. The switches themselves may not be located in the HFTD areas but can be used to support customer impact reduction.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design and System Hardening	7.3.3.8.3	C.04	Distribution Line Motorized Switch Operator (MSO) - Replacements	Replace at least 50 of the 104 remaining Motorized Switch Operators that are located within or are energizing line sections that feed into HFTD areas or HFRA.

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design and System Hardening	7.3.3.9.1	C.05	SCADA Recloser Equipment - Installations	Install 17 substation SCADA enabled reclosers on circuits serving line sections that feed into HFTD areas or HFRA, barring any exceptions due to connectivity issues necessary to SCADA-enable the recloser. Footnote: There may be connectivity issues for some SCADA reclosers that will require manual setting updates, but there is still benefit in installing the recloser to get the sectionalization on the circuit.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design and System Hardening	7.3.3.9.2	C.06	Fuse Savers (Single Phase Reclosers) - Installations	Install 80 single phase recloser sets in HFTD areas or HFRA.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design and System Hardening	7.3.3.11.1	C.07	Temporary Distribution Microgrids	Make operationally ready at least four (4) additional Distribution Microgrid Pre-installed Interconnection Hubs (PIHs). This target will include 1 PIH that completed construction in December 2021 and will be made ready to operate in 2022.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design and System Hardening	7.3.3.11.2	C.08	Rincon Transformer Fuse - Replacement	Replace the fuse with a circuit switcher on the Rincon Transformer Bank 1.
WMP Activity Completion	c. Small (less than 100 items)	Grid Design and System Hardening	7.3.3.11.3	C.09	Emergency Back-up Generation – Equip PG&E Service Centers	Equip 15 PG&E Service Centers or Materials Distribution Centers sites with emergency back-up generation to allow the sites to operate with the same amount of functionality

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
	Volume Quantifiable Goal/Target				& Materials Distribution Centers	as they would if they were being fed from their normal utility power source.
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Grid Design and System Hardening	7.3.3.16	C.10	10K Undergrounding	Complete at least 175 circuit miles of undergrounding work. The 175 circuit mile target includes undergrounding taking place as part of both System Hardening (Section 7.3.3.17.1), Butte County Rebuild efforts (Section 7.3.3.17.6) including a small volume of previously hardened overhead lines that are being placed underground, and any other undergrounding work performed in HFTD or fire rebuild areas.
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Grid Design and System Hardening	7.3.3.17.1	C.11	System Hardening - Distribution	Complete at least 470 circuit miles of system hardening work which includes overhead system hardening, undergrounding and removal of overhead lines in HFTD or buffer zone areas with the exception of any mileage being undergrounded and tracked separately as part of our Butte County Rebuild efforts (Section 7.3.3.17.6).
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design and System Hardening	7.3.3.17.2	C.12	System Hardening - Transmission	Remove or replace 32 circuit miles of transmission conductor on lines traversing the HFTD areas or HFRA.
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Grid Design and System Hardening	7.3.3.17.3	C.13	Surge Arrestor - Removals	Remove all of the remaining non-exempt surge arrestors in HFTD areas (based on the known population of 4,590 surge arrestors as of January 1, 2022) through replacement with exempt equipment.

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design and System Hardening	7.3.3.17.5	C.14	Remote Grid - Operate New SPS Units	Operate 2 new Remote Grid Standalone Power System (SPS) units
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design and System Hardening	7.3.3.17.6	C.15	Butte County Rebuild - Undergrounding	Complete 55 circuit miles of undergrounding work as part of the Butte County Rebuild program.
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Asset Management and Inspections	7.3.4.1	D.01	Detailed Inspections - Distribution	Complete detailed inspections on a minimum of 396,000 distribution poles, which were identified in PG&E's asset registry as of January 1, 2022, in HFTD areas or HFRA, barring External Factors. Any poles discovered after January 1, 2022 with a field installation date on or before 2020 will be inspected within 90 days of when added to the asset registry. Any poles discovered after January 1, 2022 with a field installation date in 2021 or 2022 will not be in scope for inspection as part of this 2022 WMP target.
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Asset Management and Inspections	7.3.4.2	D.02	Detailed Inspection Transmission – Ground	Complete detailed ground inspections on a minimum of 39,000 transmission structures in PG&E's asset registry as of January 1, 2022, in HFTD areas or HFRA, barring External Factors. Any assets discovered after January 1, 2022 with a field installation date on or before 2020 will be inspected within

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
						90 days of when added to the asset registry. Any assets discovered after January 1, 2022 with a field installation date in 2021 or 2022 will not be in scope for inspection as part of this 2022 WMP target.
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Asset Management and Inspections	7.3.4.2	D.03	Detailed Inspection Transmission – Climbing	Complete detailed climbing inspections on a minimum of 1,800 transmission structures in PG&E's asset registry as of January 1, 2022, in HFTD areas or HFRA, barring External Factors. Any assets discovered after January 1, 2022 with a field installation date on or before 2020 will be inspected within 90 days of when added to the asset registry. Any assets discovered after January 1, 2022 with a field installation date in 2021 or 2022 will not be in scope for inspection as part of this 2022 WMP target.
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Asset Management and Inspections	7.3.4.2	D.04	Detailed Inspection Transmission – Aerial	Complete detailed aerial inspections on a minimum of 39,000 transmission structures in PG&E's asset registry as of January 1, 2022, in HFTD areas or HFRA, barring External Factors. Any assets discovered after January 1, 2022 with a field installation date on or before 2020 will be inspected within 90 days of when added to the asset registry. Any assets discovered after January 1, 2022 with a field installation date in 2021 or 2022 will not be in scope for inspection as part of this 2022 WMP target.

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Asset Management and Inspections	7.3.4.4	D.05	Infrared Inspections - Distribution	Complete infrared inspections on a minimum of 9,000 distribution circuit miles in PG&E's asset registry as of January 1, 2022, in HFTD areas or HFRA, barring External Factors. Any assets identified after January 1, 2022 with a field installation date on or before 2020 will be inspected within 90 days of when added to the asset registry. Any assets identified after January 1, 2022 with a field installation date in 2021 or 2022 will not be in scope for inspection as part of this 2022 WMP target.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Asset Management and Inspections	7.3.4.15	D.06	Supplemental Inspections - Substation Distribution	Complete supplemental inspections on 86 distribution substations in HFTD areas or HFRA, barring External Factors.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Asset Management and Inspections	7.3.4.15	D.07	Supplemental Inspections - Substation Transmission	Complete supplemental inspections on 43 transmission substations within HFTD areas or HFRA, barring External Factors.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Asset Management and Inspections	7.3.4.16	D.08	Supplemental Inspections - Hydroelectric Substations and Powerhouses	Complete supplemental inspections on 52 Hydroelectric Generation Substations and Powerhouses within HFTD areas or HFRA, barring External Factors. Co-located Hydroelectric substations and Transmission & Distribution substations are counted separately as two distinct units.

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
WMP Activity Completion	d. Qualitative Goal/Target	Asset Management and Inspections	7.3.4.14	D.09	Asset Inspections - Quality Assurance	Perform Transmission and Distribution system inspection quality audits prioritizing HFTD/HFRA areas. Statistically valid methodology parameters, such as a confidence level of 95%, will be utilized.
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Asset Management and Inspections	7.3.4.17	D.10	HFTD/HFRA Open Tag Reduction - Distribution	Close a minimum of 55,000 HFTD or HFRA distribution tags in PG&E's workplan as of June 30, 2022, barring External Factors.
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Asset Management and Inspections	7.3.4.17	D.11	HFTD/HFRA Open Tag Reduction - Transmission	Close a minimum of 18,000 HFTD or HFRA transmission tags in PG&E's workplan as of June 30, 2022, barring External Factors.
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Vegetation Management and Inspections	7.3.5.2	E.01	Enhanced Vegetation Management	Complete EVM work on 1,800 risk ranked distribution circuit miles, barring External Factors.
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Vegetation Management and Inspections	7.3.5.2	E.02	Pole Clearing Program	Inspect and clear (where clearance is needed) all poles identified in PG&E's Vegetation Management Database as of October 1, 2021, in HFTD areas or HFRA, not required by PRC 4292 and barring External Factors. Any assets discovered between October 1, 2021 and August 31, 2022 will be inspected and cleared (where clearance is needed) by the target due date, barring External Factors.

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
						Any assets discovered after August 31, 2022 will be inspected and cleared (where clearance is needed) within 45 days of when added to the Vegetation Management Database, barring External Factors.
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management and Inspections	7.3.5.7	E.03	LiDAR Ground Inspections - Distribution	Complete at least 2,000 circuit miles of Mobile LiDAR capture on HFTD road-access electric distribution lines, barring External Factors. If at any point PG&E determines this technology does not effectively support efforts to reduce wildfire risk when compared to other viable approaches or technology, PG&E will pause or discontinue Ground Based LiDAR efforts.
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management and Inspections	7.3.5.8	E.04	LiDAR Routine Inspections - Transmission	Complete LiDAR inspection of approximately 18,000 circuit miles of transmission lines, barring External Factors.
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management and Inspections	7.3.5.13	E.05	Vegetation Management - Quality Assurance and Quality Verification	Target revised per Revision Notice #10 1. Quality Assurance Audits Type of audits; Distribution - voltages less than 60kV in our Routine, Tree Mortality, EVM and Pole Clearing programs. (43 audits) Vegetation Pole Clearing (1 audit) Transmission - high voltage 60kV and greater and applies to maintaining high voltage transmission corridors to Minimum NERC clearance, PRC 4293 clearance, and GO 95 Rule 35

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
						clearance (1 audit) Procedure audit of the following: Enhanced Vegetation Management, Record Keeping, Transmission and Distribution Line Verification, and Refusal Procedure (4 audits) Distribution and transmission audits include multiple trees and a 95% AQL would represent 95% of the total trees audited being in compliance with PG&E requirements. The vegetation pole clearing audit includes multiple poles and a 95% AQL would represent 95% of the total poles audited being in compliance with PG&E requirements. The procedure audit includes a review of PG&E's vegetation standards and whether PG&E's vegetation management team adhered to the process and procedures in the standard. 2. Quality Verification Reviews Type of Verification; Distribution - voltages less than 60kV in our Routine, Tree Mortality, EVM and Pole Clearing programs (1,522 Reviews). Vegetation Pole Clearing (3,421 Poles). Transmission - high voltage 60kV and greater and applies to maintaining high voltage transmission corridors to Minimum NERC clearance, PRC 4293 clearance, and GO 95 Rule 35 clearance (260 Reviews). Distribution and transmission reviews include multiple trees and a 95% AQL would represent 95% of the total trees reviewed being in compliance with PG&E requirements. The vegetation pole clearing reviews includes multiple poles and a 95% AQL would represent 95% of the total poles reviewed being in compliance with PG&E requirements.

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management and Inspections	7.3.5.17.1	E.06	Defensible Space Inspections - Distribution Substation	Complete defensible space inspections in alignment with the guidelines set forth in PRC 4291 at 132 distribution substations within HFTD areas or HFRA, barring External Factors.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Vegetation Management and Inspections	7.3.5.17.2	E.07	Defensible Space Inspections - Transmission Substation	Complete defensible space inspections in alignment with the guidelines set forth in PRC 4291 at 55 transmission substations within HFTD areas or HFRA, barring External Factors.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Vegetation Management and Inspections	7.3.5.17.3	E.08	Defensible Space Inspections - Hydroelectric Substations and Powerhouses	Complete defensible space inspections at 61 Hydroelectric Generation Substations and Powerhouses within HTFD areas or HFRA, barring External Factors. Co-located hydroelectric substations and Transmission & Distribution substations are counted separately as two distinct units.
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Vegetation Management and Inspections	7.3.5.20	E.09	Utility Defensible Space - Distribution	Complete utility defensible space work on a minimum of 7,000 poles in the HFTD, barring External Factors.
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field	Vegetation Management and Inspections	7.3.5.2	E.10	Pole Clearing - per PRC 4292 in State Responsibility Areas (SRA)	PG&E will inspect and clear, where clearance is needed, 80,258 distribution poles subject to PRC 4292 in State Responsibility Areas identified by PRC 4292, barring External Factors or poles that are exempt under Title 14 Cal. Code of Regulations 1255.

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
	Verifiable					This number may change as poles are added, removed, or have a change in status during the pole clearing program cycle. Any assets discovered between October 1, 2021 and August 31, 2022 will be inspected and cleared (where clearance is needed) by the target due date, barring External Factors. Any assets discovered after August 31, 2022 will be inspected and cleared (where clearance is needed) within 45 days of when added to the Vegetation Management Database, barring External Factors. Poles in fields that are plowed or cultivated, such as planted row crops, cultivated fields, vineyards, nonflammable summer fallow, irrigated pastureland, fruit, nut, citrus orchards, Christmas tree farms, swamp, marsh or bog land and where vegetation is maintained less than 30.48 cm in height, is fire resistant, and is planted and maintained for the specific purpose of preventing soil erosion and fire ignition.
WMP Activity Completion	d. Qualitative Goal/Target	Grid Operations and Protocols	7.3.6.8	F.01	EPSS - Settings Design and Test	Conduct laboratory testing to refine the circuit device design parameters for 2022 EPSS implementation.
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Operations and Protocols	7.3.6.8	F.02	EPSS - Install Settings on Distribution Line devices	Load the engineered settings on protection devices (line reclosers and fuse savers) on the identified 1,018 circuits (as of March 10, 2022) on the following schedule, barring External Factors: (1) On 80 percent of line devices by 5/1/22 and,

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
						(2) On the remaining 20 percent of line devices by 8/1/22
WMP Activity Completion	d. Qualitative Goal/Target	Grid Operations and Protocols	7.3.6.8	F.03	EPSS - Develop Enablement Standards and Procedures	Develop the procedure to govern the enablement of EPSS settings in 2022.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Operations and Protocols	7.3.6.8	F.04	EPSS - Reliability Improvements	Initiate reliability mitigations on 50 EPSS capable circuits in the HFTD areas, HFRA and non-HFTD buffer zones based on highest projected Customer Experiencing Sustained Outage (CESO).
WMP Activity Completion	d. Qualitative Goal/Target	Data Governance	7.3.7.1	G.01	Data Governance - Identify and Centralize High Priority Data	1. Document and implement a process to identify data gaps in Foundry for critical risk drivers 2. Identify and incorporate new high-priority datasets into Foundry in support of analytic products 3. Identify and incorporate 20 new, foundational ontology objects into Foundry
WMP Activity Completion	d. Qualitative Goal/Target	Resource Allocation Methodology	7.3.8.3	H.01	Risk Spend Efficiency - Develop and Share Governance Process	Develop and share RSE Governance Process with Energy Safety.
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Stakeholder Cooperation & Community Engagement	7.3.10.1	J.01	Community Engagement - Meetings	Host 22 customer and community focused virtual meetings (i.e., Safety Town Halls, CWSP Webinars) to further stakeholder and community awareness of PG&E's wildfire mitigation efforts.

Appendix B - List of Documents Reviewed

Item No.	Documents Reviewed - Public	Document Date
1	Office of Energy Infrastructure Safety's 2020 Substantial Vegetation Management Audit PG&E	Jun-22
2	Office of Energy Infrastructure Safety's Report on 2020 Substantial Vegetation Management Audit PG&E	Sep-22
3	Filsinger Energy Partners PG&E Independent Safety Monitor Status Update Report (https://www.cpuc.ca.gov/-/media/cpuc-website/industries-and-topics/documents/pge/oversight-and-enforcement/ism-status-update-report-q3-2022.pdf)	Oct-22
4	Public Resource Code - PRC Section 4291 https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4291.&lawCode=PRC	Apr-22
5	Action News Now Article *PG&E to install underground power lines in Butte County* https://www.actionnewsnow.com/news/local/pg-e-to-install-underground-power-lines-in-butte-county/article_1f4a12a2-ea21-11ed-88c6-8f2653786537.html	May-23
6	PG&E's Annual Report on Compliance for 2022 WMP Plan https://efiling.energysafety.ca.gov/search.aspx?docket=2022-EC_ARC	Mar-22
7	PG&E's Response to 2021 Independent Evaluator Report https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52891&shareable=true	Aug-22
8	CPUC Fire-Threat Map Adopted by CPUC https://files.cpuc.ca.gov/safety/fire-threat_map/2021/CPUC%20Fire%20Threat%20Map_v.3_08.19.2021.Letter%20Size.pdf	Aug-21
9	CPUC Fire-Threat Maps and Fire-Safety Rulemaking https://www.cpuc.ca.gov/industries-and-topics/wildfires/fire-threat-maps-and-fire-safety-rulemaking	Jun-23
10	PG&E's Wildfire Mitigation Plans and Associated Documents https://www.pge.com/en_US/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan.page?WT.mc_id=Vanity_wildfiremitigationplan	May-23

Appendix C – Data Log, Data and Interview Requests

PG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date/Time Response Received	Section	DRU#	Transmitted Via Intralinks /FTP Site	Response Name and File Name
000	4/18/2023	BV	Introductory kick off power point	Tues 4/18/2023 5:05 PM	All	All	Email	Independent Evaluator PGE Introductory Kick Off_2023_Copy
000	4/28/2023	BV	Spend analysis copy from 4/26 presentation	Friday 4/28/2023 11:49:00 AM	All	DRU11694.001.002	Uploaded to BVNA FTP	DRU11694 R02_OEIS Confidentiality Declaration.pdf, DRU11694_Audit_IE_WSD-022_Orientation_2022_WMP_Spend_Analysis_BVNA_Q001_R002.pdf, DRU11694_Q01_Atch01_R02_PGE_financials_2022_WMP_Independent_Evaluator_CONF.pdf, DRU11694_Q01_Atch02_R02_PGE_2022_WMP_Independent_EvaluatorPGE_2022 ARC_20230331_Appendix B.xlsx
001	3/2/2023	BV	Initiatives and Goals	Thu 5/4/2023 5:35 PM	All	DRU11764	Intralinks	DRU-11507 Response & DRU11694_Audit_IE-WSD-022-BVNA_04182023_001 & DRU11689_Audit-IE-WSD-022_BVNA_04282023_001

002	3/9/2023	BV/ Lisa Beaver	Vegetation Management Spatial Information - GPS Information for poles associated with initiatives: 7.3.5.2 7.3.5.7 7.3.5.20 for team to look at locations for understanding team deployment needs and estimating.	17-Mar	NA	DRU11566	FTP	DRU11566_Audit_IE_WSD-022_DR_Pre009_Q001_R001
003R	4/21/2023	BV	Asset Management and Inspections - D.02	Tue 4/25/2023 5:11 P	7.3.4.2 – D.02	DRU11575	Intralinks	DRU11575_Audit_IE_WSD-022_D.02-7.3.4.2_DR_BVNA_003R_Q002_R001DRU11575_Q02_Atch01_Detailed Inspections Transmission-GroundDRU11575_Q02_Atch01_D.02_Detailed Inspections Transmission-Groundv1DRU11575_Audit_IE_WSD-022_D.02-7.3.4.2_DR_BVNA_020_Q002_R003DRU11575_Q02_Atch02_D.02_Detailed Inspections Ground_SamplingFolder:

								DRU11575_Q02_Atch01_Detailed Inspections_Ground_CONF (Atch.026-275) too multiple to list
003R	4/21/2023	BV	Asset Management and Inspections - D.03	Tue 4/25/2023 5:11 P	7.3.4.3 – D.03	DRU11575	Intralinks	DRU11575_Audit_IE_WSD-022_D.03-7.3.4.2_DR_BVNA_003R_Q003_R001 DRU11575_Q03_Atch01_Transmission Climbing Inspections DRU11575_Q03_Atch01_D.03_Transmission Climbing Inspectionsv1 DRU11575_Audit_IE_WSD-022_D.03-7.3.4.2_DR_BVNA_020_Q003_R003 DRU11575_Q03_R03_Atch03_Transmission Climbing Inspections Folder: DRU11575_Q03_R03_Atch01_Tier 2 Climbing Inspections_CONF with multiple subfolders and files, too many to list.
003R	4/21/2023	BV	Asset Management and Inspections - D.06	Tue 4/25/2023 5:11 P	7.3.4.15 – D.06	DRU11575	Intralinks	Folder R001: DRU11575_Audit_IE_WSD-022_D.06-7.3.4.15_DR_BVNA_003R_Q006_R001 DRU11575_Q06_Atch01_DistributionSubstation
003R	4/21/2023	BV	Asset Management and Inspections - D.07	Tue 4/25/2023 5:11 P	7.3.4.15 – D.07	DRU11575	Intralinks	Folder R001: DRU11575_Audit_IE_WSD-022_D.07-7.3.4.15_DR_BVNA_003R_Q007_R001 DRU11575_Q07_Atch01_TransmissionSubstation
003R	4/21/2023	BV	Asset Management and Inspections - D.08	Tue 4/25/2023 5:11 P	7.3.4.15 – D.08	DRU11575	Intralinks	Folder R001: DRU11575_Audit_IE_WSD-022_D.08-7.3.4.16_DR_BVNA_003_Q008_R001, DRU11575_Q08_Atch01_PGEN

								Folder R002: Multiple files to list
003R	4/21/2023	BV	Asset Management and Inspections - D.09	Tue 4/25/2023 5:11 P	7.3.4.15 – D.09	DRU11575	Intralinks	DRU11575_Audit_IE_WSD-022_D.09-7.3.4.14_DR_BVNA_019_Q009_R001, DRU11575_Q09_Atch01_Transmission_Final Report 713 System Inspections Rev.2_CONF, DRU11575_Q09_Atch02_Distribution_2022 690 Dist. SI Audit Final Report Rev.2_CONF, DRU11575_Q09_Atch03_QV Distribution System Inspections Audit Checklist, DRU11575_Q09_Atch04_QV Transmission System Inspections Audit Checklist, DRU11575_Q09_Atch05_RISK-6301P-12_Electric Quality Verification Distribution Audit Procedure_CONF, DRU11575_Q09_Atch07_2022 WMP-D.09-Asset Inspections-QA-Define_CONF
003R	4/21/2023	BV	Asset Management and Inspections - D.010	Wed 4/26/2023 5:27 P	7.3.4.17 – D.10	DRU11575	Intralinks	DRU11575_Audit_IE_WSD-022_D.10-7.3.4.17_DR_BVNA_003R_Q010_R001, DRU11575_Q10_Atch01_CNCL_COMP_45951_tags_4_26_2023, DRU11575_Q10_Atch02_OPEN_1060_tags_4_26_2023
003R	4/21/2023	BV	Asset Management and Inspections - D.011	Wed 4/26/2023 5:27 PM	7.3.4.17 – D.11	DRU11575	Intralinks	DRU11575_Audit_IE_WSD-022_D.11-7.3.4.17_DR_BVNA_003R_Q011_R001.pdf DRU11575_Q11_Atch01_2022 WMP LC Tags - 2023-01-02 data_extract.xlsb

003R (A)	4/25/2023	BV	Asset Management and Inspections - D.01	Wed 4/26/2023 5:27 PM	7.3.4.1 - D.01	DRU11575	FTP	DRU11575_Audit_IE_WSD-022_D.01-7.3.4.1_DR_BVNA_003R_Q001_R001.pdfDRU11575_Q01_Atch01_ Detailed Inspection-Distribution.xlsb
004R	4/21/2023	BV	Grid Design and System Hardening - C.03	Tue 4/25/2023 5:11 PM	7.3.3.8.2 - C.03	DRU11572	FTP/ Intralinks	Multiple files
004R	4/21/2023	BV	Grid Design and System Hardening - C.04	Tue 4/25/2023 5:11 PM	7.3.3.8.3 - C.04	DRU11572	Intralinks /FTP Site	DRU11572_Audit_IE_WSD-022_C.04-7.3.3.8.3_DR_BVNA_004R_Q004_R001.pdf DRU11572_Q04_Atch01_2022 MSO FINAL from Jan 2023 032123.xlsx
004R	4/21/2023	BV	Grid Design and System Hardening - C.05	Wed 4/26/2023 5:27 PM	7.3.3.9.1 - C.05	DRU11572	Intralinks	DRU11572_Audit_IE_WSD-022_C.05-7.3.3.9.1_DR_BVNA_004R_Q005_R001.pdf DRU11572_Q05_Atch01_Wildfire Non-Reclose Program Completed Units.xlsx
004R	4/21/2023	BV	Grid Design and System Hardening - C.06	Wed 4/26/2023 5:27 PM	7.3.3.9.1 - C.06	DRU11572	Intralinks	Folder R001: DRU11572_Audit_IE_WSD-022_C.06-7.3.3.9.2_DR_BVNA_004R_Q006_R001, DRU11572_Q06_Atch01_ 2022_C.06_Fuse_Savers_Program
004R	4/21/2023	BV	Grid Design and System Hardening - C.07	Wed 4/26/2023 5:27 PM	7.3.3.9.1 - C.07	DRU11572	Intralinks/ FTP Site	DRU11572_Audit_IE_WSD-022_C.07-7.3.3.11.1_BVNA_004R_04242023.001 DRU11572_Q07_Atch01_Distribution Microgrid Pre-installed Interconnection Hubs.xlsx

004R	4/21/2023	BV	Grid Design and System Hardening - C.08	Tue 4/25/2023 5:11 PM	7.3.3.11.2 - C.08	DRU11572	Intralinks	Folder R001:DRU11572_Audit_IE_WSD-022_C.08-7.3.3.11.2_DR_BVNA_004R_Q008_R001DRU11572_Q08_Atch01_Rincon Fuse Replacement
004R	4/21/2023	BV	Grid Design and System Hardening - C.09	Tue 4/25/2023 5:11 PM	7.3.3.11.3 - C.09	DRU11572	Intralinks	Folder R001: DRU11572_Audit_IE_WSD-022_C.09-7.3.3.11.3_DR_BVNA_004R_Q009_R001 DRU11572_Q09_Atch01_Generator Resiliency Work Plan Tracker
004R	4/21/2023	BV	Grid Design and System Hardening - C.14	Tue 4/25/2023 5:11 PM	7.3.3.17.5 – C.14	DRU11572	Intralinks	Folder: R001 DRU11572_Audit_IE_WSD-022_C.14-7.3.3.17.5_DR_BVNA_004R_Q014_R001 DRU11572_Q14_Atch01_Remote Grid
005	4/21/2023	BV	Stakeholder Cooperation & Community Engagement - J.01	Wed 4/26/2023 5:27 PM	7.3.10.1 - J.01	DRU11585	Intralinks	Folder R001: DRU11585_IE_WSD-022_J.01-7.3.10.1_DR_BVNA_005_Q001_R001 DRU11585_Q01_Atch01_2022_Town Halls and Webinars
006	4/21/2023	BV	Situational Awareness and Forecasting - B.04	Tue 4/25/2023 5:11 PM	7.3.2.2.3 - B.04	DRU11568	Intralinks	Folder R001: DRU11568_Audit_IE_WSD-022_B.04-7.3.2.2.3_DR_BVNA_006_Q001_R001 DRU11568_Q01_Atch01_B.04 Response
006	4/21/2023	BV	Situational Awareness and Forecasting - B.05	Tue 4/25/2023 5:11 PM	7.3.2.2.3 - B.05	DRU11570	Intralinks	Folder R001: DRU11570_Audit_IE_WSD-022_B.05-7.3.2.2.3_DR_BVNA_006_Q001_R001 DRU11570_Q01_Atch01_B.05 Response

006	4/21/2023	BV	Situational Awareness and Forecasting - B.06	Tue 4/25/2023 5:11 PM	7.3.2.2.5 - B.06	DRU11571	Intralinks	Folder R001:DRU11571_Audit_IE_WSD-022_B.06-7.3.2.2.5_DR_BVNA_006_Q001_R001DRU11571_Q01_Atch01_B.06 Response
007	4/25/2023	C2	Section 7 Mitigation Initiatives	Fri 4/28/2023 4:34 PM	All	DRU11746	FTP	DRU11746_Audit_IE_WSD-022_DR_C2-Group_007_Q001_R001.pdf DRU11746_Q001_Atch01_WMP initiatives.xlsx
008	4/25/2023	BV	Asset Management and Inspections - D.04	Fri 4/28/2023 4:34 PM	7.3.4.2 - D.04	DRU11575.004	Intralinks and FTP	DRU11575_Audit_IE_WSD-022_D.04-7.3.4.2_DR_008_BVNA_04282023
009	4/26/2023	BV	DRU-11575 - D.08	Fri 4/28/2023 4:34 PM	7.3.4.16 - D.08	DRU11575.008	Intralinks	Folder R001: 2.1.1 DRU11575_Audit_IE_WSD-022_D.08-7.3.4.16_DR_BVNA_003_Q008_R001.pdf 2.1.2 DRU11575_Q08_Atch01_PGEN.xlsx
010	4/26/2023	BV	Grid Design and System Hardening - DRU-11572 - C.07	Fri 4/28/2023 4:34 PM	7.3.3.11.1 - C.07	DRU11572.007.002	Intralinks	DRU11572_Audit_IE_WSD-022_C.07-7.3.3.11.1_BVNA_004R_04242023.001DRU11572_Q07_Atch01_Distribution Microgrid Pre-installed Interconnection Hubs.xlsx

011	4/30/2023	C2	Asset Management, Vegetation Management, and Grid Operations - D.05	Thu 5/4/2023 5:35 PM	7.3.4.4 - D.05	DRU11575	Intralinks /FTP Site	DRU11575.05_OEIS Confidentiality Declaration.pdf DRU11575_Audit_IE_WSD-022_D.05-7.3.4.4_DR_BVNA_011_Q005_R001.pdf DRU11575_Q05_Atch01_2022 OH Dist IR Insp 20221229.xlsx DRU11575_Q05_Atch02_2022 WMP Target Validation D.05 - Infrared Inspections - Distribution_CONF.pdf DRU11575_Q05_Atch02_2022 WMP Target Validation D.05 - Infrared Inspections - Distribution_Redacted.pdf
011	4/30/2023	C2	Asset Management, Vegetation Management, and Grid Operations - E.03	Thu 5/4/2023 5:35 PM	7.3.5.7 - E.03	DRU11578	Intralinks /FTP Site	DRU11578.03_OEIS Confidentiality Declaration.pdf DRU11578_Audit_IE_WSD-022_E.03-7.3.5.7_DR_BVNA_011_Q003_R001.pdf DRU11578_Q03_Atch01_VMDR1976_No003_1_PGE_Structures.csv DRU11578_Q03_Atch02_VMDR1976_No003_1_Spans.csv DRU11578_Q03_Atch03_VMDR1976_ATT1_SOW CWA C44690 Cyclomedia 3.29.2022_CONF.pdf DRU11578_Q03_Atch04_VMDR1976_No003_2_GeographicalMap_CONF.pdf DRU11578_Q03_Atch05_2022 WMP-E.03-LiDAR Ground_Dist_Define_CONF.pdf

011	4/30/2023	C2	Asset Management, Vegetation Management, and Grid Operations - E.04	Fri 5/5/2023 5:34 PM	7.3.5.8 - E.04	DRU11578	FTP Site	DRU11578.04_OEIS Confidentiality Declaration.pdfDRU11578_Audit_IE_WSD-022_E.04-7.3.5.8_DR_BVNA_011_Q004_R001.pdfDRU11578_Q04_Atch01_VM2022_Circuit_PMDs_LatLongs.xlsxDRU11578_Q04_Atch02_PG&E+NV5_VM22_Mileage Difference_6.2.22.pdfDRU11578_Q04_Atch03_2022 WMP E.04 LiDAR Routine Inspection Define_CONF.pdfDRU11578_Q04_Atch03_2022 WMP E.04 LiDAR Routine Inspection Define_Redacted.pdf\
011	4/30/2023	C2	Asset Management, Vegetation Management, and Grid Operations - E.05	Fri 5/12/2023 6:21 PM	7.3.5.13 - E.05	DRU11578	Intralinks/ FTP Site	DRU11578.05_OEIS Confidentiality Declaration.pdfDRU11578_Audit_IE_WSD-022_E.05-7.3.5.13_DR_BVNA_011_Q005_R001_5.1.2023.pdfDRU11578_Q05_Atch03_2022_QAVM_739_System & Orchard Transmission_CONF.pdfDRU11578_Q05_Atch04_2022_QAVM_746_Enhanced Vegetation Management Program_CONF.pdfDRU11578_Q05_Atch05_2022_QAVM_762_Veg Record Keeping Audit_CONF.pdfDRU11578_Q05_Atch06_2022_QAVM_816_Transmission & Distribution Line Verification Audit_CONF.pdfDRU11578_Q05_Atch07_2022_QAVM_818_Refusal Procedure Audit_CONF.pdfDRU11578_Q05_Atch09_2022 WMP-E.05-Veg Mgmt-QA Define_CONF.pdf

011	4/30/2023	C2	Asset Management, Vegetation Management, and Grid Operations - E.06	Thu 5/4/2023 5:35 PM	7.3.5.17.1 - E.06		FTP Site	DRU11578.06_OEIS Confidentiality Declaration.pdfDRU11578_Audit_IE_WSD-022_E.06-7.3.5.17.1_DR_BVNA_011_Q006_R001.pdfDRU11578_Q06_Atch01_E.06 Defensible Space Inspections - D Subs_NRM.xlsxDRU11578_Q06_Atch02_2022 WMP-E.06 Defensible Space Distribution Subs-Define_CONF.pdfDRU11578_Q06_Atch03_Substation Def Sp Inspection 2022 Completion List_Distribution.xlsxDRU11578_Q06_Atch04_Sample Inspection Form DS_CYCLE 1 MAINTENANCE_WORK ORDER FORM_HIGGINS_20220411.pdfDRU11578_Q06_Atch05_Sample Mitigation Form DS_HFTD SUBSTATIONS_PI FORM_HIGGINS_20211124_CONF.pdfDRU11578_Q06_Atch06_LAND-4001P-01_CONF.pdf
011	4/30/2023	C2	Asset Management, Vegetation Management, and Grid Operations - F.02	Thu 5/4/2023 5:35 PM	7.3.6.8 - F.02	DRU11581	FTP Site	DRU11581.02_OEIS Confidentiality Declaration.pdf DRU11581_Audit_IE_WSD-022_F.02-7.3.6.8_DR_BVNA_011_Q002_R001.pdf DRU11581_Q02_Atch01_F02 EPSS Device Capability_2022_07_25_V6_CONF.xlsx DRU11581_Q02_Atch02_2022 WMP-F.02 EPSS Install Settings on Distribution Line Devices-Define_CONF.pdf
012	5/1/2023	BV	Situational Awareness and	Wed 5/3/2023 6:26 PM	7.3.2.2.3 - B.04	DRU11568	Intralinks	Folder R002: DRU11568_Audit_IE_WSD-022_B.04-7.3.2.2.3_DR_BVNA_012_Q001_R002, DRU11568_Q01_R02_Atch01_2022 Q1 DFA First

			Forecasting - B.04					Communication Report, DRU11568_Q01_R02_Atch02_2022 Q1 DFA Online Confirmations, DRU11568_Q01_R02_Atch03_2022 Q1 DFA Report, DRU11568_Q01_R02_Atch04_2022 Q2 DFA First Communication Report, DRU11568_Q01_R02_Atch05_2022 Q2 DFA Online Confirmations, DRU11568_Q01_R02_Atch06_2022 Q2 DFA Report, DRU11568_Q01_R02_Atch07_2022 Q3 DFA First Communication Report, DRU11568_Q01_R02_Atch08_2022 Q3 DFA Online Confirmations, DRU11568_Q01_R02_Atch09_2022 Q3 DFA Report, DRU11568_Q01_R02_Atch10_2022 Q4 DFA First Communication Report, DRU11568_Q01_R02_Atch11_2022 Q4 DFA Online Confirmations, DRU11568_Q01_R02_Atch12_2022 Q4 DFA Report, DRU11568_Q01_R02_Atch13_B.04 DFA Sensor List
012	5/1/2023	BV	Situational Awareness and Forecasting - B.05	Wed 5/3/2023 6:26 PM	7.3.2.2.3 - B.05	DRU11570	Intralinks	Folder R002:DRU11570_Q01_R02_Atch01_EFD 2021 Design Locations_CONF, DRU11570_Q01_R02_Atch02_MIDDLETOWN 1101_CONF, DRU11570_Q01_R02_Atch03_WYANDOTTE 1103_CONF, DRU11570_Audit_IE_WSD-022_B.05-7.3.2.2.3_DR_BVNA_012_Q001_R002

012	5/1/2023	BV	Situational Awareness and Forecasting - B.06	Wed 5/3/2023 6:26 PM	7.3.2.2.5 - B.06	DRU11571	Intralinks	Folder R002: Apprx. 40-45 files, too many to list
013R	5/1/2023	BV	Grid Design and System Hardening - C.03	Wed 5/3/2023 6:26 PM	7.3.3.8.2 - C.03	DRU11572	Intralinks	Apprx. 40-45 files, too many to list
013R	5/1/2023	BV	Grid Design and System Hardening - C.07	Wed 5/3/2023 6:26 PM	7.3.3.11.1 - C.07	DRU11572	Intralinks	DRU11572_Audit_IE_WSD-022_C.07-7.3.3.11.1_BVNA_004R_04242023.001 DRU11572_Q07_Atch01_Distribution Microgrid Pre-installed Interconnection Hubs.xlsx
013R	5/1/2023	BV	Grid Design and System Hardening - C.08	Tue 5/2/2023 5:48 PM	7.3.3.11.2 - C.08	DRU11572	Intralinks	Folder R001: DRU11572_Audit_IE_WSD-022_C.08-7.3.3.11.2_DR_BVNA_004R_Q008_R001 DRU11572_Q08_Atch01_Rincon Fuse Replacement
013R	5/1/2023	BV	Grid Design and System Hardening - C.09	Wed 5/3/2023 6:26 PM	7.3.3.11.3 - C.09	DRU11572	Intralinks	Multiple files in various formats
013R	5/1/2023	BV	Grid Design and System Hardening - C.14	Wed 5/3/2023 6:26 PM	7.3.3.17.5 - C.14	DRU11572	Intralinks	Folder: R002DRU11572_Audit_IE_WSD-022_C.14-7.3.3.17.5_DR_BVNA_013_Q014_R002, DRU11572_Q014_R02_Atch01_Corning Remote 0001_As-Built Drawings_CONF,

								DRU11572_Q014_R02_Atch02_Corning Remote 0002_As-Built Drawings_CONF, DRU11572_Q014_R02_Atch03_Corning Remote 0001_Testing and Commissioning Report_CONF, DRU11572_Q014_R02_Atch04_Corning Remote 0001_Load Test_CONF, DRU11572_Q014_R02_Atch05_Corning Remote 0002_Testing and Commissioning Report_CONF, DRU11572_Q014_R02_Atch06_Corning Remote 0002_Load Test_CONF, DRU11572_Q014_R02_Atch07_Corning Remote 0001 and 0002_Completion Photos, DRU11572_Q014_R02_Atch08_Corning Remote 0001 and 0002_Cutover Work Order_CONF, DRU11572_Q014_R02_Atch09_Corning Remote 0001_BESS FAT Report_CONF, DRU11572_Q014_R02_Atch10_Corning Remote 0002_BESS FAT Report_CONF, DRU11572_Q014_R02_Atch11_Corning Remote 0001_BESS Commissioning Report_CONF, DRU11572_Q014_R02_Atch12_Corning Remote 0002_BESS Commissioning Report_CONF, DRU11572_Q014_R02_Atch13_Corning Remote 0001_G5-1 Form_CONF, DRU11572_Q014_R02_Atch14_Corning Remote 0002_G5-1 Form_CONF
013R	5/1/2023	BV	Grid Design and System Hardening - C.04	Thu 5/4/2023 5:35 PM	7.3.3.8.3 - C.04	DRU11572	FTP Site	12.1.1 DRU11572_Audit_IE_WSD-022_C.04-7.3.3.8.3_DR_BVNA_004R_Q004_R001.pdf 12.1.2 DRU11572_Q04_Atch01_2022 MSO FINAL from Jan 2023 032123.xlsx

013R	5/1/2023	BV	Grid Design and System Hardening - C.05	Thu 5/4/2023 5:35 PM	7.3.3.9.1 - C.05	DRU11572	FTP Site	19.1.1 DRU11572_Audit_IE_WSD-022_C.05-7.3.3.9.1_DR_BVNA_004R_Q005_R001.pdf 19.1.2 DRU11572_Q05_Atch01_Wildfire Non-Reclose Program Completed Units.xlsx
013R	5/1/2023	BV	Grid Design and System Hardening - C.06	Thu 5/4/2023 5:35 PM	7.3.3.9.2 - C.06	DRU11572	FTP Site	DRU11572_Audit_IE_WSD-022_C.06-7.3.3.9.2_DR_BVNA_022_Q006_R003Subfolder DRU11572_Q03_R03_Atch01_Fuse Savers_Single Phase Reclosers Installations_CONF; multiple subfolders with multiple files
014R	5/1/2023	BV	Asset Management and Inspections	Rescinded by BV 5/5 3:33 PM - Provided in DR03R via Intralinks 4/25 and FTP 5/4, other requests provided later with more info	DRU11575	NA	NA	014R

015R	5/5/2023	BV	Asset Management and Inspections - D.04 Mil sample	Wed 5/10/2023 6:22 PM	7.3.4.2 - D.04	DRU11575	FTP	DRU11575_Audit_IE_WSD-022_D.04-7.3.4.2_DR_BVNA_015R_Q004_R002.pdf DRU11575_Q04_R02_Atch01_7.3.4.2 D.04_Tier 2 and 3 Sampling List_CONF.xlsx Folder DRU11575_Q04_R02_Atch02_Tier 2 Inspection Reports: 125 items, too many to list Folder DRU11575_Q04_R02_Atch03_Tier 3 Inspection Reports: 375 items, too many to list
016	Rescinded 5/2 9:31AM by BV	BV	Asset Management and Inspections - D.10	NA	NA	NA	NA	NA
017	5/1/2023	BV	Stakeholder Cooperation & Community Engagement - J.01	Wed 5/3/2023 6:26 PM	7.3.10.1 - J.01	DRU11585	Intralinks	Folder R002:Apprx. 25-30 various pdf file names, too many to list
018	5/8/2023	C2	Situational Awareness, Vegetation Management, and Grid Operations - B.02	Fri 5/12/2023 6:21 PM	7.3.2.1.3 - B.02	DRU11551	Intralinks	DRU11551_Audit_Independent Evaluator_WSD-022_B.02-7.3.2.1.3_DR_BVNA_018_Q001_R001 DRU11551_Q01_Atch01_B.02_Weather Stations DRU11551_Q01_Atch02_2022 WMP_B.02_Weather Stations_Define_CONF

018	5/8/2023	C2	Situational Awareness, Vegetation Management, and Grid Operations - B.03	Thu 5/11/2023 6:01 PM	7.3.2.1.4 - B.03	DRU11552	Intralinks	DRU11552_Audit_IE_WSD-022_B.03-7.3.2.1.4_DR_BVNA_018_Q001_R001 DRU11552_Q01_Atch01_WMP_Reporting_Camera_Installation_2022_11_1_CONF DRU11552_Q01_Atch02_2022_WMP_B.03_HD_Cameras_Define_CONF
018	5/8/2023	C2	Situational Awareness, Vegetation Management, and Grid Operations - C.10	Fri 5/12/2023 6:21 PM	7.3.3.16 - C.10	DRU11572	Intralinks	DRU11572_Audit_IE_WSD-022_C.10-7.3.3.16_DR_BVNA_018_Q010_R001 DRU11572_Q010_Atch01_2022 Undergrounding Summary_CONF DRU11572_Q010_Atch02_TD_2502M_Electric_Underground_Construction_Manual_Book_1(TOC)_CONF DRU11572_Q010_Atch03_TD_2503M_Electric_Underground_Construction_Manual_Book_2(TOC)_CONF DRU11572_Q010_Atch04_2022_WMP_C.10_10K_UG_Define_CONF DRU11572_Q010_Atch05_QA_QC_Example_31066255_DIAMOND_SPRINGS_1A_EL_DORADO_CTY_R20A_1_CONF
018	5/8/2023	C2	Situational Awareness, Vegetation Management, and Grid Operations - C.11	Fri 5/12/2023 6:21 PM	7.3.3.17.1 - C.11	DRU11572	Intralinks	DRU11572_Audit_IE_WSD-022_C.11-7.3.3.17.1_DR_BVNA_018_Q011_R001DRU11572_Q011_Atch01_2022 System Hardening Daily Summary_CONFDRU11572_Q011_Atch02_2022_WMP_C.11_SH_Distribution_Define_CONFDRU11572_Q011_Atch03_QA_QC_Example_31066255_DIAMOND_SPRINGS_1A_EL_DORADO_CTY_R20A_1_CONFDRU11572_Q011_Atch04_TD-2501M_Electric_Overhead_Construction_Manu

								al_CONFDRU11572_Q011_Atch05_TD-2502M - Electric_Underground_Construction_Manual_Book_1_(TOC)_CONFDRU11572_Q011_Atch06_TD-2503M - Electric_Underground_Construction_Manual_Book_2_(TOC)_CONFDRU11572_Q011_Atch07_TD_9001M_14_Electric_Design_Manual_(TOC)DRU11572_Q011_Atch08_TD_9001M_01_Electric_Design_Manual_(Introduction)
018	5/8/2023	C2	Situational Awareness, Vegetation Management, and Grid Operations - C.13	Fri 5/12/2023 6:21 PM	7.3.3.17.3 - C.13	DRU11572	Intralinks	DRU11572_Audit_IE_WSD-022_C.13-7.3.3.17.3_DR_BVNA_018_Q013_R001 DRU11572_Q013_Atch01_HFTD SA 2022 Master Tracker WMP Closure Submission_CONF DRU11572_Q013_Atch02_118790878_Complete+QA _CONF DRU11572_Q013_Atch03_2022 WMP-C.13-SurgeArrester-Define_CONF
018	5/8/2023	C2	Situational Awareness, Vegetation Management, and Grid Operations - C.01	Fri 5/12/2023 6:21 PM	7.3.3.7 - C.01	DRU11572	Intralinks	26.1 DRU11572_Audit_IE_WSD-022_C.01-7.3.3.7_DR_BVNA_018_Q001_R001.pdf 26.2 DRU11572_Q01_Atch01_2022 TOL FINAL from Jan 2023 050923_CONF.xlsx 26.3 DRU11572_Q01_Atch02_C.01 QA Pass_CONF.pdf 26.4 DRU11572_Q01_Atch03_C.01 Completed Job Package_CONF.pdf 26.5 DRU11572_Q01_Atch04_2022 WMP-C.01-Expulsion Fuse-Define_CONF.pdf
018	5/8/2023	C2	Situational Awareness, Vegetation Management,	Fri 5/12/2023 6:21 PM	7.3.3.8.1 - C.02	DRU11572	Intralinks	28.1 DRU11572_Audit_IE_WSD-022_C.02-7.3.3.8.1_DR_BVNA_018_Q002_R001.pdf28.2 DRU11572_Q02_Atch01_2022 Sectionalizing Devices from Jan 2023 050923_CONF.xlsx28.3

			and Grid Operations - C.02					DRU11572_Q02_Atch02_C.02 QA Pass_CONF.pdf28.4 DRU11572_Q02_Atch03_C.02 Completed Job Package_CONF.pdf28.5 DRU11572_Q02_Atch04_C.02 SCADA Released Letter_CONF.pdf28.6 DRU11572_Q02_Atch05_2022 WMP-C.02-Distribution Sectionalizing Devices-Define_CONF.pdf
018	5/8/2023	C2	Situational Awareness, Vegetation Management, and Grid Operations - E.01	Fri 5/12/2023 6:21 PM	7.3.5.2 - E.01	DRU11578	Intralinks	DRU11578_Audit_IE_WSD-022_E.01-7.3.5.2_DR_BVNA_018_Q001_R001 DRU11578_Q01_Atch01 DRU11578_Q01_Atch02_Quality Dashboards Vegetation Management DRU11578_Q01_Atch03_2022 WMP-E.01-EVM-Define_CONF
018	5/8/2023	C2	Situational Awareness, Vegetation Management, and Grid Operations - E.02	Fri 5/12/2023 6:21 PM	7.3.5.2 - E.02	DRU11578	Intralinks	32.1 DRU11578_Audit_IE_WSD-022_E.02-7.3.5.2_DR_BVNA_018_Q002_R001.pdf 32.2 DRU11578_Q01_Atch01_Pole_Data.xlsx 32.3 DRU11578_Q02_Atch02_VM Reference Guide.pdf 32.4 DRU11578_Q02_Atch03_2022 WMP-E.02 Pole Clearing_Define_CONF.pdf
018	5/8/2023	C2	Situational Awareness, Vegetation Management, and Grid Operations - E.09	Fri 5/12/2023 6:21 PM	7.3.5.20 - E.09	DRU11578	Intralinks	29.1 DRU11578_Audit_IE_WSD-022_E.09-7.3.5.20_DR_BVNA_018_Q009_R001.pdf 29.2 DRU11578_Q09_Atch01_UDS QIU Q4 Completion Report_CONF.xlsx 29.3 DRU11578_Q09_Atch02_Embedded QA_QC_CONF.xlsx

								29.4 DRU11578_Q09_Atch03-UDS-Distribution-Define_CONF.pdf
018	5/8/2023	C2	Situational Awareness, Vegetation Management, and Grid Operations - B.02-03, C.10-11, C.13, C.01-02, E.01-02, E.09-10	Mon 5/15/2023 6:16 PM	7.3.3.16 – C.10	DRU11572	Intralinks	DRU11572_Audit_IE_WSD-022_C.10-7.3.3.16_DR_BVNA_018_Q010_R001, DRU11572_Q010_Atch01_2022 Undergrounding Summary_CONF, DRU11572_Q010_Atch02_TD_2502M_Electric_Underground_Construction_Manual_Book_1(TOC)_CONF, DRU11572_Q010_Atch03_TD_2503M_Electric_Underground_Construction_Manual_Book_2(TOC)_CONF, DRU11572_Q010_Atch04_2022_WMP_C.10_10K_UG_Define_CONF, DRU11572_Q010_Atch05_QA_QC_Example_31066255_DIAMOND_SPRINGS_1A_EL_DORADO_CTY_R20A_1_CONF
018	5/8/2023	C2	Situational Awareness, Vegetation Management, and Grid Operations - B.02-03, C.10-11, C.13, C.01-	Mon 5/15/2023 6:16 PM	7.3.3.17.1 – C.11	DRU11572	Intralinks	DRU11572_Audit_IE_WSD-022_C.11-7.3.3.17.1_DR_BVNA_018_Q011_R001, RU11572_Q011_Atch01_2022 System Hardening Daily Summary_CONF, DRU11572_Q011_Atch02_2022_WMP_C.11_SH_Distribution_Define_CONF, DRU11572_Q011_Atch03_QA_QC_Example_31066255_DIAMOND_SPRINGS_1A_EL_DORADO_CTY_R20A_1_CONF,

			02, E.01-02, E.09-10					DRU11572_Q011_Atch04_TD-2501M_Electric_Overhead_Construction_Manual_CONF, RU11572_Q011_Atch05_TD-2502M - Electric_Underground_Construction_Manual_Book_1_(TOC)_CONF, DRU11572_Q011_Atch06_TD-2503M - Electric_Underground_Construction_Manual_Book_2_(TOC)_CONF, DRU11572_Q011_Atch07_TD_9001M_14_Electric_Design_Manual_(TOC), DRU11572_Q011_Atch08_TD_9001M_01_Electric_Design_Manual_(Introduction)
018	5/8/2023	C2	Situational Awareness, Vegetation Management, and Grid Operations - B.02-03, C.10-11, C.13, C.01-02, E.01-02, E.09-10	Tue 5/16/2023 5:41 PM	7.3.5.2 - E.10	DRU11578	Intralinks	DRU11578_Audit_IE_WSD-022_E.10-7.3.5.2_DR_BVNA_018_Q010_R001DRU11578_Q010_Atch01_2022 WMP Data E.10 Pole ClearingDRU11578_Q010_Atch02_2022 WMP Validation E.10 Pole Clearing Define_CONFDRU11578_Q010_Atch03_VC Desktop Reference Tool
019 C2	5/12/2023	C2	Multiple - C.12, C.15, F.04, E.07, E.08, D.09, B.01, A.01-03, A.05, F.01, F.03, G.01, H.01	Mon 5/15/2023 6:16 PM	7.3.1.3 – A.01	DRU11553	Intralinks	DRU11553_Audit_IE_WSD-022_A.01-7.3.1.3_DR_BVNA_019_Q001_R001 DRU11553_Q01_Atch01_12.07.2022 Wildfire Risk Governance Forum_CONF DRU11553_Q01_Atch02_Email Approval WRGSC Final Materials for 12_7_2022_CONF DRU11553_Q01_Atch03_2022 WMP-A.01-DistributionModeling-Define_CONF

019 C2	5/12/2023	C2	Multiple - C.12, C.15, F.04, E.07, E.08, D.09, B.01, A.01-03, A.05, F.01, F.03, G.01, H.01	Mon 5/15/2023 6:16 PM	7.3.1.4 - A.03	DRU11555	Intralinks	DRU11555_Q01_Atch01_05.18.2022 Wildfire Risk Governance Forum_CONF DRU11555_Q01_Atch02_Email Approval WRGSC Final Materials for 05.18.2022_CONF DRU11555_Q01_Atch03_2022 WMP-A.03-PSPS Consequence Model-Define_CONF DRU11555_Audit_IE_WSD-022_A.03-7.3.1.4_DR_BVNA_019_Q001_R001
019 C2	5/12/2023	C2	Multiple - C.12, C.15, F.04, E.07, E.08, D.09, B.01, A.01-03, A.05, F.01, F.03, G.01, H.01	Mon 5/15/2023 6:16 PM	7.3.1.5 - A.04	DRU11560	Intralinks	DRU11560_Audit_IE_WSD-022_A.04-7.3.1.5_DR_BVNA_019_Q001_R001DRU11560_Q01_Atch01_WRGSC Final Materials for 11_16_2022 & 11_17_2022_CONFDRU11560_Q01_Atch02_Email Approval_11.16.2022 WRGSC_vF_CONFDRU11560_Q01_Atch03_2022 WMP-A.04-WCME-Ingress Egress-Define_CONF
019 C2	5/12/2023	C2	Multiple - C.12, C.15, F.04, E.07, E.08, D.09, B.01, A.01-03, A.05, F.01, F.03, G.01, H.01	Tue 5/16/2023 5:41 PM	7.3.1.3 - A.02	DRU11554	Intralinks	DRU11554_Audit_IE_WSD-022_A.02-7.3.1.3_Data Request_BVNA_019_Q001_R001 DRU11554_Q01_Atch01_09.14.2022 WRGSC_vf_CONF DRU11554_Q01_Atch02_Email Approval WRGSC Final Materials for 09.14.2022_CONF DRU11554_Q01_Atch03_2022 WMP-A.02-TransmissionModeling-Define_CONF

019 C2	5/12/2023	C2	Multiple - C.12, C.15, F.04, E.07, E.08, D.09, B.01, A.01-03, A.05, F.01, F.03, G.01, H.01	Tue 5/16/2023 5:41 PM	7.3.1.5 – A.05	DRU11562	Intralinks	DRU11562_Audit_IE_WSD-022_A.05-7.3.1.5_DR_BVNA_019_Q001_R001 DRU11562_Q01_Atch01_WRGSC Final Materials for 11_16_2022 & 11_17_2022_CONF DRU11562_Q01_Atch02_Email Approval_11.16.2022 WRGSC_vF_CONF DRU11562_Q01_Atch03_2022 WMP-A.05-WCME-ResistancetoControl-Define_CONF
019 C2	5/12/2023	C2	Multiple - C.12, C.15, F.04, E.07, E.08, D.09, B.01, A.01-03, A.05, F.01, F.03, G.01, H.01	Wed 5/17/2023 7:02 PM	7.3.2.1.1 - B.01	DRU11564	Intralinks	DRU11564_IE_WSD-022_B.01-7.3.2.1.1_DR_BVNA_019_Q001_R001 DRU11564_Q01_Atch01_PGE Q2 2022 Ens WRF Verification_CONF DRU11564_Q01_Atch02_EnsembleMean DRU11564_Q01_Atch03_EnsembleMean2 DRU11564_Q01_Atch04_2022_WMP_B.01_FPI_IPW_Evaluation_Define_CONF DRU11564_Q01_Atch05_WRGSC_Final_Materials_for_11_16_2022_&_11_17_2022_CONF 08.24.2022 Wildfire Risk Governance Forum vF (002)_CONF
019 C2	5/12/2023	C2	Multiple - C.12, C.15, F.04, E.07, E.08, D.09, B.01, A.01-03, A.05, F.01, F.03, G.01, H.01	Wed 5/17/2023 7:02 PM	7.3.8.3 – H.01	DRU11584	Intralinks	DRU11584_Audit_IE_WSD-022_H.01-7.3.8.3_DR_BVNA_019_Q001_R001DRU11584_Q01_Atch01_Update on PG&E RSE Governance Process per 2022 WMP_CONFDRU11584_Q01_Atch02_PGE Risk Spend Efficiency (RSE) Governance 20220920_CONFDRU11584_Q01_Atch03_2022 WMP-H.01-Risk Spend Efficiency-Define_CONF

019 C2	5/12/2023	C2	Multiple - C.12, C.15, F.04, E.07, E.08, D.09, B.01, A.01-03, A.05, F.01, F.03, G.01, H.01	Wed 5/17/2023 7:02 PM	7.3.5.17.3 – E.08	DRU11578	Intralinks	DRU11578_Q08_Atch02_Hydro Sub Powerhouses DS Insp_CONF DRU11578_Audit_IE_WSD-022_E.08-7.3.5.17.3_DR_BVNA_019_Q008_R001 DRU11578_Q08_Atch01_Def.Space Insp_Powerhouses_Data DRU11578_Q08_Atch03_Def.Space Insp_Powerhouses_Define_CONF
019 C2	5/12/2023	C2	Multiple - C.12, C.15, F.04, E.07, E.08, D.09, B.01, A.01-03, A.05, F.01, F.03, G.01, H.01	Wed 5/17/2023 7:02 PM	7.3.3.17.6 – C.15	DRU11572	Intralinks	DRU11572_Audit_IE_WSD-022_C.15-7.3.3.17.6_DR_BVNA_019_Q015_R001, DRU11572_Q015_Atch01_C.15_Butte UG_Validation Report_R1, DRU11572_Q015_Atch04_35103617-BR-07-09-W-(E)-WOODGLEN-PARB-3 (1)_CONF, DRU11572_Q015_Atch05_2022 WMP-C.15-ButteCountyUG_Final-Define_CONFFolder: DRU11572_Q015_Atch03_Short UG Projects Drawings_CONF (contains multiple subfolders with multiple names, too many to list)Folder: DRU11572_Q015_Atch02_MLUG Projects Drawings_CONF (contains multiple subfolders with multiple names, too many to list)
019 C2	5/12/2023	C2	Multiple - C.12, C.15, F.04, E.07, E.08, D.09, B.01, A.01-03, A.05, F.01, F.03, G.01, H.01	Wed 5/17/2023 7:02 PM	7.3.3.17.2 – C.12	DRU11572	Intralinks	DRU11572_Audit_IE_WSD-022_C.12-7.3.3.17.2_DR_BVNA_019_Q012_R001, DRU11572_Q012_Atch01_2022_WMP_System_Hardening_Work_Tracker_CONF, DRU11572_Q012_Atch02_Caribou_Palermo_As-Built_CONF, DRU11572_Q012_Atch03_Vacaville_Jameson_As-Built_CONF, DRU11572_Q012_Atch04_Trinity_Cottonwood_

								As-Built_CONF, DRU11572_Q012_Atch05_Drum_Rio_Osos_As-Built_ph.1_CONF, DRU11572_Q012_Atch06_Drum_Rio_Osos_As-Built_ph.2_CONF, DRU11572_Q012_Atch07_2022_WMP_C.12_SH_Transmission_Define_CONF
019R	5/10/2023	BV	Asset Management and Inspections - D.06 & D.07 - forms/photos sampling request based on Intralinks spreadsheet	Mon 5/15/2023 6:16 PM	7.3.4.15 – D.06	DRU11575	Intralinks	R003:DRU11575_Audit_IE_WSD-022_D.06-7.3.4.15_DR_BVNA_019R_Q006_R003, DRU11575_Q06_R03_Atch01_DistributionSubstation - D.06_Supp, DRU11575_Q06_R03_Atch02_20220422-18244248170_CONF, DRU11575_Q06_R03_Atch03_20220430-18245444527_CONF,DRU11575_Q06_R03_Atch04_20220518-18248327801_CONF, DRU11575_Q06_R03_Atch05_20220502-18245642724_CONF, DRU11575_Q06_R03_Atch05_20220502-18245642724_CONF, DRU11575_Q06_R03_Atch06_20220523-18249182862_CONF, DRU11575_Q06_R03_Atch07_20220526-18249646132_CONF, DRU11575_Q06_R03_Atch08_20220511-18247111379_CONF, DRU11575_Q06_R03_Atch09_20220526-18249637992_CONF, DRU11575_Q06_R03_Atch10_20220519-18248587652_CONF, DRU11575_Q06_R03_Atch11_20220430-

								18245452104_CONF, DRU11575_Q06_R03_Atch12_20220511-18246936571_CONF, DRU11575_Q06_R03_Atch13_20220518-18248350001_CONF, DRU11575_Q06_R03_Atch14_20220523-18249147666_CONF
019R	5/10/2023	BV	Asset Management and Inspections - D.06 & D.07 - forms/photos sampling request based on Intralink spreadsheet	Mon 5/15/2023 6:16 PM	7.3.4.15 – D.07	DRU11575	Intralinks	R003: DRU11575_Audit_IE_WSD-022_D.07-7.3.4.15_DR_BVNA_019R_Q007_R003, DRU11575_Q07_Atch01_Balch1-2 PH_20220420_CONF, DRU11575_Q07_Atch02_Big Bend_20220523_CONF, DRU11575_Q07_Atch03_Eagle Rock_20220527_CONF, DRU11575_Q07_Atch04_Hillsdale Jct_20220505_CONF, DRU11575_Q07_Atch05_Lewiston_20220523_CONF, DRU11575_Q07_Atch06_OakmontNorth_20220527_CONF, DRU11575_Q07_Atch07_SanJoaquin2 PH_20220511_CONF, DRU11575_Q07_Atch08_Stanislaus PH_20220518_CONF
020	5/16/2023	BV	Detailed Inspections - Distribution/Transmission (Ground/Clim	Thu 5/18/2023 8:27 PM	7.3.4.1-D.01	DRU11575	Intralinks	4.1 DRU11575_Audit_IE_WSD-022_D.01-7.3.4.1_DR_BVNA_003R_Q001_R001.pdf 4.2 DRU11575_Q01_Atch01_ Detailed Inspection-Distribution.xlsb 4.3 DRU11575_Audit_IE_WSD-022_D.01-

			bing) - D.01 - D.03 Inspection forms and photos					7.3.4.1_DR_BVNA_020_Q001_R003.pdf 4.4 DRU11575_Q01_R03_Atch03_D.01 Spreadsheet.xlsx Subfolder 4.5 DRU11575_Q01_R03_Atch01_Tier 2 Inspection Reports_CONF - 200 items, too many to list Subfolder4.6 DRU11575_Q01_R03_Atch02_Tier 3 Inspection Reports_CONF - 600 items, too many to list
020	5/16/2023	BV	Detailed Inspections - Distribution/Transmission (Ground/Climbing) - D.01 - D.03 Inspection forms and photos	Thu 5/18/2023 8:27 PM	7.3.4.2 - D.02	DRU11575	Intralinks	5.1 DRU11575_Audit_IE_WSD-022_D.02-7.3.4.2_DR_BVNA_003R_Q002_R001.pdf5.2 DRU11575_Q02_Atch01_Detailed Inspections Transmission-Ground.xlsx5.3 DRU11575_Q02_Atch01_D.02_Detailed Inspections Transmission-Groundv1.xlsx5.4 DRU11575_Audit_IE_WSD-022_D.02-7.3.4.2_DR_BVNA_020_Q002_R003.pdf5.5 DRU11575_Q02_Atch02_D.02_Detailed Inspections Ground_Sampling.xlsxFolder 5.6 DRU11575_Q02_Atch01_Detailed Inspections_Ground_CONF - 425 items, too many to list
020	5/16/2023	BV	Detailed Inspections - Distribution/Transmission (Ground/Climbing) - D.01 - D.03 Inspection	Thu 5/18/2023 8:27 PM	7.3.4.2 - D.03	DRU11575	Intralinks	6.1 DRU11575_Audit_IE_WSD-022_D.03-7.3.4.2_DR_BVNA_003R_Q003_R001.pdf 6.2 DRU11575_Q03_Atch01_Transmission Climbing Inspections.xlsx 6.3 DRU11575_Q03_Atch01_D.03_Transmission Climbing Inspectionsv1.xlsx 6.4 DRU11575_Audit_IE_WSD-022_D.03-7.3.4.2_DR_BVNA_020_Q003_R003.pdf 6.5 DRU11575_Q03_R03_Atch03_Transmission

			forms and photos					Climbing Inspections.xlsx Folder 6.6 DRU11575_Q03_R03_Atch01_Tier 2 Climbing Inspections_CONF - multiple subfolders and files, too many to list Folder 6.7 DRU11575_Q03_R03_Atch02_Tier 3 Climbing Inspections_CONF - multiple subfolders and files, too many to list
021	5/15/2023	BV	Open Tag Reduction Distribution/Transmission - mil sampling D.010 - D.011 inspection forms and photos	Tue 5/23/2023 5:18 PM final outstanding	7.3.4.17 - D.10	DRU11575	Intralinks	Folder R003: DRU11575_Audit_IE_WSD-022_D.10-7.3.4.17_DR_BVNA_021_Q010_R003, DRU 11575_Q10_R03_Atch02_D.10 Spreadsheet_Submission-2_May 23 Subfolder DRU11575_Q10_R03_Atch01_Tier 2_Notification Tags_Submission-2_May 23_CONF Subfolder Notifications CNCL: multiple more subfolders and files, too many to list Subfolder Notifications COMP: multiple more subfolders and files, too many to list Folder R004: DRU 11575_Q10_R04_Atch02_D.10 Spreadsheet_Submission-3_May 24, DRU11575_Audit_IE_WSD-022_D.10-7.3.4.17_DR_BVNA_021_Q010_R004 Subfolder DRU11575_Q10_R04_Atch01_Tier 3_Notification Tags_Submission-3_May 24_CONF; multiple subfolders and files, too many to list Folder R005:

								Subfolder DRU11575_Q10_R05_Atch01_Tier 3_Notification Tags_Submission-4_May 25_CONF; multiple subfolders and files, too many to list
021	5/15/2023	BV	Open Tag Reduction Distribution/Transmission - mil sampling D.010 - D.011 inspection forms and photos	Tue 5/23/2023 5:18 PM final outstanding	7.3.4.17 – D.11	DRU11575	Intralinks	Folder R002:DRU11575_Audit_IE_WSD-022_D.11-7.3.4.17_DR_BVNA_021_Q011_R002DRU11575_Q11_R02_D.11 Spreadsheet - Submission-1_May 18Subfolder DRU11575_Q11_R02_Atch01_Tier 3_Notification Tags_Submission-1_May 18_CONF - multiple files, too many to listFolder R003:DRU11575_Audit_IE_WSD-022_D.11-7.3.4.17_DR_BVNA_021_Q011_R003DRU11575_Q11_R03_Atch03_D.11 Spreadsheet - Submission-2_May 19Subfolder DRU11575_Q11_R03_Atch01_Tier 2_Notification Tags_Submission-2_May 19_CONF - multiple files, too many to listSubfolder DRU11575_Q11_R03_Atch02_Tier 3_Notification Tags_Submission-2_May 19_CONF - multiple files, too many to list
022	5/17/2023	BV	C.04-C06 mil sampling	Mon 5/22/2023 4:52 PM	7.3.3.9.2 - C.06	DRU11572	Intralinks	Folder R001: DRU11572_Audit_IE_WSD-022_C.06-7.3.3.9.2_DR_BVNA_004R_Q006_R001 DRU11572_Q06_Atch01_ 2022_C.06_Fuse_Savers_Program Folder R003: DRU11572_Audit_IE_WSD-022_C.06-7.3.3.9.2_DR_BVNA_022_Q006_R003 DRU11572_Q03_R03_Atch01_Fuse

								Savers_Single Phase Reclosers Installations_CONF; multiple folders with muptiple files
022	5/17/2023	BV	C.04-C06 mil sampling	Mon 5/22/2023 4:52 PM	7.3.3.9.1 - C.05	DRU11572	Intralinks	Folder R003: DRU11572_Audit_IE_WSD-022_C.05-7.3.3.9.1_DR_BVNA_022_Q005_R003 DRU11572_Q05_Atch01_C.05 Supplemental Documents_CONF
022	5/17/2023	BV	C.04-C06 mil sampling	Fri 5/19/2023 6:02 PM	7.3.3.8.3 - C.04	DRU11572	Intralinks	Folder R002: 14 subfolders with multiple files each, too many to list
023	5/30/2023	C2	Large Volume Quantifiable Goal/Target – Not Field Verifiable	Thu 6/1/2023 5:19 PM	7.3.4.4 – D.05	DRU11575	Intralinks	DRU11575_Q05_R02_Atch01_D.05 Distribution Infrared Inspection SampleDRU11575_Q05_R02_Atch02_Attachments for Delivery 2 Inspection Logs_CONFFolder R002:DRU11572_Q04_Atch01_PM 35295912_GC_CONF, DRU11572_Q04_Atch02_PM 35185710_GC_CONF, DRU11572_Q04_Atch03_PM 35205371_GC_CONF, DRU11572_Q04_Atch04_PM 35205372_GC_CONF, DRU11572_Q04_Atch05_PM

								35205725_CNT_CONF, DRU11572_Q04_Atch06_PM 35295910_GC_CONF, DRU11572_Q04_Atch07_PM 35295932_CNT_CONF, DRU11572_Q04_Atch08_PM 35298311 _CNT_CONF, DRU11572_Q04_Atch09_PM 35185449_GC_CONF, DRU11572_Q04_Atch10_PM 35205287_GC_CONF, DRU11572_Q04_Atch11_PM 35205720_CNT_CONF, DRU11572_Q04_Atch12_PM 35204408_CNT_CONF, DRU11572_Q04_Atch13_PM 35185520_GC_CONF, DRU11572_Audit_IE_WSD-022_C.04-7.3.3.8.3_DR_BVNA_022_Q004_R003
023	5/30/2023	C2	Large Volume Quantifiable Goal/Target – Not Field Verifiable	Thu 6/1/2023 5:19 PM	7.3.5.13 – E.05	DRU11578	Intralinks	DRU11578.005.002:DRU11578_Audit_IE_WSD-022_E.05-7.3.5.13_DR_BVNA_011_Q005_R002, DRU11578_Q05_Atch02_2022_QAVM_741_Vegetation Control Pole Clearing Audit_CONF, DRU11578_Q05_Atch01_2022_QAVM_Veg Pole Clearing Locations, DRU11578_Q05_Atch03_Distribution QVVM Location Data_CONF, DRU11578_Q05_Atch04_Transmission QVVM Location Data_CONF, DRU11578_Q05_Atch05_VC QVVM Location DataDRU11578.005.003:DRU11578_Audit_IE_WSD-022_E.05-

								7.3.5.13_DR_BVNA_011_Q005_R003, DRU11578_Q05_R03_Atch01_Distribution QAVM List of Audits_CONF (File names too numerous to provide)DRU11578.005.004:DRU11578_Audit_IE_WSD-022_E.05-7.3.5.13_DR_BVNA_023_Q005_R004, DRU11578_Q05_R04_Atch01_E.05 Vegetation Management QA Sample, DRU11578_Q05_R04_Atch02_2022 NC-23-AC North Coast Bundles 2 and 3 Audit Final Report Package_CONF, DRU11578_Q05_R04_Atch03_2022 EBMI-DI-PESF-1-AC Bay Area Audit Final Report Package_CONF, DRU11578_Q05_R04_Atch04_2022 FR-1-HFTD Fresno Bundle 1 Distribution HFTD Audit Final Report Package_CONF, DRU11578_Q05_R04_Atch05_2022 CC-2-HFTD Audit Final Report Package_CONF, DRU11578_Q05_R04_Atch06_QAVM 2022 SA-12-AC Sacramento 1 and 2 Distribution Audit Final Report Package_CONF
023	5/30/2023	C2	Large Volume Quantifiable Goal/Target – Not Field Verifiable	Thu 6/1/2023 5:19 PM	7.3.5.17.1 – E.06	DRU11578	Intralinks	DRU11578_Audit_IE_WSD-022_E.06-7.3.5.17.1_DR_BVNA_023_Q006_R002: DRU11578_Q06_R02_Atch01_Defensible Space Inspections DistSub_CONF

023	5/30/2023	C2	Large Volume Quantifiable Goal/Target – Not Field Verifiable	Thu 6/1/2023 5:19 PM	7.3.6.8 – F.02	DRU11581	Intralinks	DRU11581_IE_WSD-022_F.02-7.3.6.8_DR_BVNA_023_Q002_R002: DRU11581_Q02_R02_Atch01_F.02 EPSS Setting_CONF
024	6/6/2023	C2	Verification of Funding	Mon 6/12/2023 6:02 PM	7.3.2.2.5	DRU11935	Intralinks	22.3.2.1 DRU11935_Audit_IE_WSD-022_7.3.2.2.5_DR_BVNA_024_Q006_R001.pdf
024	6/6/2023	C2	Verification of Funding	Mon 6/12/2023 6:02 PM	7.3.5.2	DRU11935	Intralinks	22.3.4.1 DRU11935_Audit_IE_WSD-022_7.3.5.2_DR_BVNA_024_Q007_R001.pdf
024	6/6/2023	C2	Verification of Funding	Mon 6/12/2023 6:02 PM	7.3.9.5	DRU11935	Intralinks	22.3.1.1 DRU11935_Audit_IE_WSD-022_7.3.9.5_DR_BVNA_024_Q002_R001.pdf
024	6/6/2023	C2	Verification of Funding	Mon 6/12/2023 6:02 PM	7.3.5.8	DRU11935	Intralinks	22.3.5.1 DRU11935_Audit_IE_WSD-022_7.3.5.8_DR_BVNA_024_Q003_R001.pdf
024	6/6/2023	C2	Verification of Funding	Mon 6/12/2023 6:02 PM	7.3.3.12.4	DRU11935	Intralinks	22.3.3.1 DRU11935_Audit_IE_WSD-022_7.3.3.12.4_DR_BVNA_024_Q004_R001.pdf
024	6/6/2023	C2	Verification of Funding	Mon 6/12/2023 6:02 PM	7.3.4.8	DRU11935	Intralinks	22.3.7.1 DRU11935_Audit_IE_WSD-022_7.3.4.8_DR_BVNA_024_Q005_R001.pdf

024	6/6/2023	C2	Verification of Funding	Mon 6/12/2023 6:02 PM	7.3.3.11.4	DRU11935	Intralinks	22.3.6.1 DRU11935_Audit_IE_WSD-022_7.3.3.11.4_DR_BVNA_024_Q001_R001.pdf
025	6/7/2023	C2	Small (less than 100 items) Volume Quantifiable Goal/Target§ DRU11572 - C.12 - System Hardening – Transmission§ DRU11572 - C.15 - Butte County Rebuild – Undergrounding (SME Interview)§ DRU11581 - F.04 - EPSS - Reliability Improvements	Fri 6/9/2023 3:06 PM	7.3.3.17.2 – C.12	DRU11572	Intralinks	Folder R001:44.1.1 DRU11572_Audit_IE_WSD-022_C.12-7.3.3.17.2_DR_BVNA_019_Q012_R001.pdf44.1.2 DRU11572_Q012_Atch01_2022_WMP_System_Hardening_Work_Tracker_CONF.xlsm44.1.3 DRU11572_Q012_Atch02_Caribou_Palermo_As-Built_CONF.pdf44.1.4 DRU11572_Q012_Atch03_Vacaville_Jameson_As-Built_CONF.pdf44.1.5 DRU11572_Q012_Atch04_Trinity_Cottonwood_As-Built_CONF.pdf44.1.6 DRU11572_Q012_Atch05_Drum_Rio_Osos_As-Built_ph.1_CONF.pdf44.1.7 DRU11572_Q012_Atch06_Drum_Rio_Osos_As-Built_ph.2_CONF.pdfFolder R002:44.2.1 DRU11572_Audit_IE_WSD-022_C.12-7.3.3.17.2_DR_BVNA_025_Q012_R002.pdf44.1.8 DRU11572_Q012_Atch07_2022_WMP_C.12_SH_Transmission_Define_CONF.pdf\
025	6/7/2023	C2	Small (less than 100 items) Volume Quantifiable Goal/Target § DRU11572 -	Fri 6/9/2023 3:06 PM	7.3.3.17.6 – C.15	DRU11572	Intralinks	Index File.xlsx Folder R001: 45.1.1 DRU11572_Audit_IE_WSD-022_C.15-7.3.3.17.6_DR_BVNA_019_Q015_R001.pdf 45.1.2 DRU11572_Q015_Atch01_C.15_Butte UG_Validation Report_R1.xlsx

			C.12 - System Hardening – Transmission § DRU11572 - C.15 - Butte County Rebuild – Undergrounding (SME Interview) § DRU11581 - F.04 - EPSS - Reliability Improvements					45.1.3 DRU11572_Q015_Atch04_35103617-BR-07-09-W-(E)-WOODGLEN-PARB-3 (1)_CONF.pdf 45.1.4 DRU11572_Q015_Atch05_2022 WMP-C.15-ButteCountyUG_Final-Define_CONF.pdf Subfolder 45.1.5 DRU11572_Q015_Atch03_Short UG Projects Drawings_CONF: 17 subfolders with multiple items, too many to list Subfolder 45.1.6 DRU11572_Q015_Atch02_MLUG Projects Drawings_CONF: 24 subfolders with multiple items, too many to list Subfolder Short_Almond Street_Road Improvement Ph1_AsBuilt: 35263029-Short_ALMOND-ST_ROAD-IMPROVEMENT_PH1-ASBUILT_CONF Subfolder PBS_Grinding RockHarmony_AsBuilt: 35254271-PBS-GRINDING-ROCK-HARMONY-ASBUILT_CONF Folder R002: 45.2.1 DRU11572_Audit_IE_WSD-022_C.15-7.3.3.17.6_DR_BVNA_025_Q015_R002.pdf
025	6/7/2023	C2	Small (less than 100 items) Volume Quantifiable Goal/Target§ DRU11572 - C.12 - System Hardening –	Fri 6/9/2023 3:06 PM	7.3.6.8 – F.04	DRU11581	Intralinks	Folder R001:51.1.1 DRU11581_IE_DR_WSD-022_F.04_BVNA_019_Q004_R001.pdf51.1.2 DRU11581_Q04_Atch01_F04_ReliabilityImprovements_JulyYTD2022 Progress_072722.xlsx51.1.3 DRU11581_Q04_Atch02_F04_35265443_CONF.pdf51.1.4 DRU11581_Q04_Atch03_F04_35216575_CONF.pdf51.1.5

			Transmission§ DRU11572 - C.15 - Butte County Rebuild – Undergrounding (SME Interview)§ DRU11581 - F.04 - EPSS - Reliability Improvements					DRU11581_Q04_Atch04_F04_35265851_CONF.pdf51.1.6 DRU11581_Q04_Atch05_F04_35087110_Asbuilt_CONF.pdf51.1.7 DRU11581_Q04_Atch06_2022 WMP-F.04 EPSS Reliability Improvements-Define_CONF.pdfFolder R002:51.2.1 DRU11581_Audit_IE_WSD-022_F.04-7.3.6.8_DR_BVNA_025_Q004_R002.pdf51.2.2 DRU11581_Q04_Atch01_F04_ReliabilityImprovements_JulyYTD2022 Progress_072722.xlsx
026	6/14/2023	BV	QA/QC - Asset Management and Inspections - Large Volume Quantifiable Goal/Target - Non-Field Verifiable	Wed 6/14/2023 6:42 PM	7.3.4.1 – D.01	DRU11575	Intralinks	Folder R004: DRU11575_Audit_IE_WSD-022_D.01-7.3.4.1_DR_BVNA_026_Q001_R004 DRU11575_Q04_R04_Atch01_2022 WMP-D.01-Inspections-Define_CONF
026	6/14/2023	BV	QA/QC - Asset Management and Inspections - Large Volume Quantifiable Goal/Target - Non-Field Verifiable	Wed 6/14/2023 6:42 PM	7.3.4.2 – D.02	DRU11575	Intralinks	Folder R004: DRU11575_Audit_IE_WSD-022_D.02-7.3.4.2_DR_BVNA_026_Q002_R004 DRU11575_Q02_R04_Atch01_2022_WMP_Target_D.02_TransmissionGround_Define_CONF

026	6/14/2023	BV	QA/QC - Asset Management and Inspections - Large Volume Quantifiable Goal/Target - Non-Field Verifiable	Wed 6/14/2023 6:42 PM	7.3.4.2 – D.03	DRU11575	Intralinks	Folder R004: DRU11575_Audit_IE_WSD-022_D.03-7.3.4.2_DR_BVNA_026_Q003_R004 DRU11575_Q03_R04_Atch01_2022_WMP_D.03_Transmission_Climbing_Define_CONF
026	6/14/2023	BV	QA/QC - Asset Management and Inspections - Large Volume Quantifiable Goal/Target - Non-Field Verifiable	Wed 6/14/2023 6:42 PM	7.3.4.17 - D.10	DRU11575	Intralinks	Folder R006: DRU11575_Audit_IE_WSD-022_D.10-7.3.4.17_DR_BVNA_026_Q010_R006 DRU11575_Q10_R06_Atch01_2022 WMP-D.10-TAG-Distribution-Define_CONF
026	6/14/2023	BV	QA/QC - Asset Management and Inspections - Large Volume Quantifiable Goal/Target - Non-Field Verifiable	Wed 6/14/2023 6:42 PM	7.3.4.17 – D.11	DRU11575	Intralinks	Folder R004: DRU11575_Audit_IE_WSD-022_D.11-7.3.4.17_DR_BVNA_026_Q011_R004 DRU11575_Q11_R04_Atch01_2022_WMP_D.11_TagsTransmission_Define_CONF

027	6/14/2023	BV	QA/QC - Asset Management and Inspections - Large Volume Quantifiable Goal/Target - Non-Field Verifiable	Wed 6/14/2023 6:42 PM	7.3.4.2 – D.04	DRU11575	Intralinks	Folder R004: DRU11575_Audit_IE_WSD-022_D.04-7.3.4.2_DR_BVNA_027_Q004_R004 DRU11575_Q04_R04_Atch01_2022 WMP-D.04-Transmission Aerial_Define_CONF
028	6/14/2023	BV	QA/QC Small Volume Grid Design and System Hardening	Thu 6/15/2023 3:58 PM	7.3.3.8.2 - C.03	DRU11572	Intralinks	Folder R003: DRU11572_Audit_IE_WSD-022_C.03-7.3.3.8.2_DR_BVNA_028_Q003_R003 DRU11572_Q03_R03_Atch01_2022 WMP_C.03-Transmission Line Sectionalizing-Define_CONF
028	6/14/2023	BV	QA/QC Small Volume Grid Design and System Hardening	Thu 6/15/2023 3:58 PM	7.3.3.8.3 - C.04	DRU11572	Intralinks	Folder R004: DRU11572_Audit_IE_WSD-022_C.04-7.3.3.8.3_DR_BVNA_028_Q004_R004 DRU11572_Q04_R04_Atch01_2022 WMP-C.04-Distribution Line (MSO)-Define_CONF
028	6/14/2023	BV	QA/QC Small Volume Grid Design and System Hardening	Thu 6/15/2023 3:58 PM	7.3.3.9.1 - C.05	DRU11572	Intralinks	Folder R004: DRU11572_Audit_IE_WSD-022_C.05-7.3.3.9.1_DR_BVNA_028_Q005_R004 DRU11572_Q05_R04_Atch01_2022 WMP_C.05-SCADA-Define_CONF
028	6/14/2023	BV	QA/QC Small Volume Grid Design and System Hardening	Thu 6/15/2023 3:58 PM	7.3.3.9.2 - C.06	DRU11572	Intralinks	Folder R004: DRU11572_Audit_IE_WSD-022_C.06-7.3.3.9.2_DR_BVNA_028_Q006_R004 DRU11572_Q06_R04_Atch01_2022 WMP_C.06-Fuse Savers-Define_CONF

028	6/14/2023	BV	QA/QC Small Volume Grid Design and System Hardening	Thu 6/15/2023 3:58 PM	7.3.3.11.1 - C.07	DRU11572	Intralinks	Folder R004: DRU11572_Audit_IE_WSD-022_C.07-7.3.3.11.1_DR_BVNA_028_Q007_R004 DRU11572_Q07_R04_Atch01_2022 WMP_C.07-TempMicrogrids-Define_CONF
028	6/14/2023	BV	QA/QC Small Volume Grid Design and System Hardening	Thu 6/15/2023 3:58 PM	7.3.3.11.2 - C.08	DRU11572	Intralinks	Folder R003: DRU11572_Audit_IE_WSD-022_C.08-7.3.3.11.2_DR_BVNA_028_Q008_R003 DRU11572_Q08_R03_Atch01_2022 WMP_C.08-Rincon Transformer Fuse Replacement-Define_CONF
028	6/14/2023	BV	QA/QC Small Volume Grid Design and System Hardening	Thu 6/15/2023 3:58 PM	7.3.3.11.3 - C.09	DRU11572	Intralinks	Folder R003: DRU11572_Audit_IE_WSD-022_C.09-7.3.3.11.3_DR_BVNA_028_Q009_R003 DRU11572_Q09_R03_Atch01_2022 WMP_C.09-Emergency Back-up-Define_CONF
028	6/14/2023	BV	QA/QC Small Volume Grid Design and System Hardening	Thu 6/15/2023 3:58 PM	7.3.3.17.5 - C.14	DRU11572	Intralinks	Folder R003: DRU11572_Audit_IE_WSD-022_C.14-7.3.3.17.5_DR_BVNA_028_Q014_R003 DRU11572_Q14_R03_Atch01_2022 WMP_C.14-Remote Grid-Define_CONF
029	6/14/2023	BV	QA/QC Stakeholder Cooperation & Community Engagement	Wed 6/14/2023 6:42 PM	7.3.10.1 – J.01	DRU11585	Intralinks	Folder R003: DRU11585_Audit_IE_WSD-022_J.01-7.3.10.1_DR_BVNA_029_Q001_R003 DRU11585_Q01_R03_Atch01_2022 WMP Target Validation - J.01 - Community Engagement – Meetings_Define_CONF

030	6/14/2023	BV	QA/QC Small Volume Situational Awareness and Forecasting	Wed 6/14/2023 6:42 PM	7.3.2.2.3 – B.04	DRU11568	Intralinks	Folder R003: DRU11568_Audit_IE_WSD-022_B.04-7.3.2.2.3_DR_BVNA_030_Q001_R003 DRU11568_Q01_R03_Atch01_2022 WMP-B.04-(DFA)-Installations_Define_CONF
030	6/14/2023	BV	QA/QC Small Volume Situational Awareness and Forecasting	Wed 6/14/2023 6:42 PM	7.3.2.2.3 – B.05	DRU11570	Intralinks	Folder R003: DRU11570_Audit_IE_WSD-022_B.05-7.3.2.2.3_DR_BVNA_030_Q001_R003 DRU11570_Q01_R03_Atch01_2022 WMP-B.05-(EFD)-Install-Define_CONF
030	6/14/2023	BV	QA/QC Small Volume Situational Awareness and Forecasting	Wed 6/14/2023 6:42 PM	7.3.2.2.5 – B.06	DRU11571	Intralinks	Folder R004: DRU11571_Audit_IE_WSD-022_7.3.2.2.5_DR_BVNA_030_Q001_R004 DRU11571_Q01_R04_Atch01_2022 WMP-B.06-Line Sensor-Define_CONF

DATA REQUEST

Data Request Number: 001 **Data Request Date: 3/2/23**

Name: Email:

Title: Phone #:

Company: Preferred Point of Contact: Email or Phone

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Initiative List and Goals							

DATA REQUEST

Data Request Number: 002 **Data Request Date: 3/9/23**

Name: [redacted] Email: [redacted]

Title: Program Manager Phone #:

Company: Bureau Veritas Preferred Point of Contact: Email or Phone: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
"Vegetation Management Spatial Information - GPS Information for poles associated with initiatives: 7.3.5.2 7.3.5.7 7.3.5.20 for team to look at locations for understanding team deployment needs and estimating."							

DATA REQUEST

Data Request Number: 003R

Name: [redacted]

WMP Category: **Asset Management and Inspections**

Company: BVNA

Data Request Date: 04-20-2023

Email: [redacted]

Phone #: [redacted]

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Large Volume Quantifiable Goal/Target - Non-Field Verifiable	# of Poles	Detailed Inspections-Distribution 7.3.4.1 - D.01	396,000	398,184	Document Review	In an Excel spreadsheet, please provide for each inspection: 1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3	High
Large Volume Quantifiable Goal/Target - Non-Field Verifiable	# of Structures	Detailed Inspection Transmission - Ground 7.3.4.2 - D.02	39,000	39,005	Document Review	In an Excel spreadsheet, please provide for each inspection: 1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3	High
Large Volume Quantifiable	# of Structures	Detailed Inspection	1,800	1,835	Document Review	In an Excel spreadsheet, please provide for each inspection:	Medium

Goal/Target - Non-Field Verifiable		Transmission - Climbing 7.3.4.2 - D.03				1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3	
Small Volume (<100 units) Quantifiable Goal/Target	# of Distribution Substations	Supplemental Inspections- Substation Distribution 7.3.4.15 - D.06	86	86	Document Review	In an Excel spreadsheet, please provide for each inspection: 1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3	Medium
Small Volume (<100 units) Quantifiable Goal/Target	# of Transmission Substations	Supplemental Inspections - Substation Transmission 7.3.4.15 - D.07	43	43	Document Review	In an Excel spreadsheet, please provide for each inspection: 1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3	Low
Small Volume (<100 units) Quantifiable Goal/Target	# of Hydroelectric Substations/ Powerhouses	Supplemental Inspections- Hydroelectric Substations and Powerhouses 7.3.4.16 - D.08	52	52	Document Review	In an Excel spreadsheet, please provide for each inspection: 1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3	Low
Large Volume Quantifiable Goal/Target - Non-Field Verifiable	# of Closed Distribution Tags	HFTD/HFRA Open Tag Reduction- Distribution 7.3.4.17 - D.10	55,000	49,951	Document Review	In an Excel spreadsheet, please provide for all closed tags: 1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3 4. List of Open Tag categories	Low
Large Volume Quantifiable	# of Closed Transmission	HFTD/HFRA Open Tag	18,000	21,145	Document Review	In an Excel spreadsheet, please provide for all closed tags:	Low

Goal/Target - Non-Field Verifiable	Tags	Reduction-Transmission 7.3.4.17 - D.11				1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3 4. List of Open Tag categories	

DATA REQUEST

Data Request Number: 003R (A)

Name: [redacted]

WMP Category: Asset Management and Inspections

Company: BVNA

Data Request Date: 04-25-2023

Email: [redacted]

Phone #: [redacted]

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Large Volume Quantifiable Goal/Target-Not Field Verifiable	# of Poles	Detailed Inspections-Distribution 7.3.4.1 - D.01	396,000	398,184	Document Review	As the provided response information will undergo further analysis to determine the sampling information subject to further subsequent data requests, we request that the spreadsheet file be transmitted via email or uploaded to BVNA's file transfer system instead of utilizing Intralinks. 5.2 DRU11575_Q01_Atch01_ Detailed Inspection-Distribution.xlsb	High

DATA REQUEST

Data Request Number: 004R

Data Request Date: 04-20-2023

Name: [redacted]

Email: [redacted]

WMP Category: **Grid Design and System Hardening**

Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Small Volume (<100 units) Quantifiable Goal/Target	# of Switches	Transmission Line Sectionalizing-Install and SCADA commission 7.3.3.8.2 - C.03	15 Line Switches	18 Line Switches	Document Review	In an Excel spreadsheet, please provide for each installation: 1. notification/order/ job number 2. PG&E region 3. Tier 2 and Tier 3	Medium
Small Volume (<100 units) Quantifiable	# of MSOs	Distribution Line Motorized Switch Operator	50 Motorized Switch Operators	57 Motorized Switch Operators	Document Review	In an Excel spreadsheet, please provide for each installation:	Medium

Goal/Target		Replacement 7.3.3.8.3 - C.04				1. notification/order/ job number 2. PG&E region 3. Tier 2 and Tier 3	
Small Volume (<100 units) Quantifiable Goal/Target	# of Reclosers	SCADA Recloser Equipment - Installations 7.3.3.9.1 - C.05	17	17	Document Review	In an Excel spreadsheet, please provide for each installation: 1. notification/order/ job number 2. PG&E region 3. Tier 2 and Tier 3	Medium
Small Volume (<100 units) Quantifiable Goal/Target	# of Fuse Saver Sets	Fuse Savers (Single Phase Reclosers)- Installations 7.3.3.9.2 - C.06	80 Fuse Savers	81 Fuse Savers	Document Review	In an Excel spreadsheet, please provide for each installation: 1. notification/order/ job number 2. PG&E region 3. Tier 2 and Tier 3	Medium
Small Volume (<100 units) Quantifiable Goal/Target	# of PIHs	Temporary Distribution Microgrids 7.3.3.11.1 - C.07	4 Microgrid PIHs	4 Microgrid PIHs	Document Review	In an Excel spreadsheet, please provide for each installation: 1. notification/order/ job number 2. PG&E region 3. Tier 2 and Tier 3	Medium
Small Volume (<100 units)	# of Fuses	Rincon Transformer Fuse-Replacement	1 Circuit Switcher	1 Circuit Switcher	Document Review	In an Excel spreadsheet, please provide for the	Medium

Quantifiable Goal/Target		7.3.3.11.2 - C.08				installation: 1. notification/order/ job number 2. PG&E region 3. Tier 2 and Tier 3	
Small Volume (<100 units) Quantifiable Goal/Target	# of Sites	Emergency Back-up Generation 7.3.3.11.3 - C.09	15 sites	15 sites	Document Review	In an Excel spreadsheet, please provide for each installation: 1. notification/order/ job number 2. PG&E region 3. Tier 2 and Tier 3	Medium
Small Volume (<100 units) Quantifiable Goal/Target	# of Remote Grids	Remote Grid - Operate New SPS Units 7.3.3.17.5 - C.14	2 SPS Units	2 SPS Units	Document Review	In an Excel spreadsheet, please provide for each installation: 1. notification/order/ job number 2. PG&E region 3. Tier 2 and Tier 3	Medium

DATA REQUEST

Data Request Number: 005

Data Request Date: 04-20-2023

Name: [redacted]

Email: [redacted]

WMP Category: Stakeholder Cooperation & Community Engagement

Phone [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.

Medium = Task Driven Not Critical. Data responses can be received secondary.

Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Small Volume (<100 units) Quantifiable Goal/Target	# of Meetings	Community Engagement Meetings 7.3.10.1 - J.01	22 Meetings	23 Meetings	Document Review	In an Excel spreadsheet, please provide for each meeting: 1. Location and Date 2. Attendance Rosters 3. PG&E Region 4. Tier 2 and Tier 3	Medium

DATA REQUEST

Data Request Number: 006

Data Request Date: 04-20-2023

Name: [redacted]

Email: [redacted]

WMP Category: Situational Awareness and Forecasting

Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Small Volume (<100 units) Quantifiable Goal/Target	# of DFA Sensors	Distribution Fault Anticipation (DFA) Installations 7.3.2.2.3 - B.04	40	48	Document Review	In an Excel spreadsheet, please provide for each installation: 1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3	High
Small Volume (<100 units) Quantifiable Goal/Target	# of Circuits	Early Fault Detection (EFD) Installations 7.3.2.2.3 - B.05	2	2	Document Review	In an Excel spreadsheet, please provide for each installation: 1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3	High

Small Volume (<100 units) Quantifiable Goal/Target	# of Circuits	Line Sensor - Installations 7.3.2.2.5 - B.06	40	63	Document Review	In an Excel spreadsheet, please provide for each installation: 1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3	High

DATA REQUEST

Data Request Number: 007

Data Request Date: 04/25/23

Name: [redacted]

Email [redacted]

Phone #: [redacted]

Company: C2 Group

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
N/A	N/A	2022 WMP Section 7. Mitigation Initiatives	N/A	N/A	Excel	As noted in the 2022 IE Orientation 2022 Wildfire Mitigation Plan meeting held on Monday, April 24, the 2022 WMP Section 7 Mitigation Initiatives were restructured and renumbered in the 2023 WMP within Section 8 Wildfire Mitigation. For comparative progression tracking and analysis, please provide a list of the 2022 WMP initiatives from Section 7 and their new corresponding 2023 WMP Initiative Section numbers. **Note: As the provided information will undergo further analysis, we request that the response files be transmitted via email instead of utilizing Intralinks.**	High

DATA REQUEST

Data Request Number: 008

Data Request Date: 04-25-2023

Name: [redacted]

Email [redacted]

WMP Category: Asset Management and Inspections

Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Large Volume Quantifiable Goal/Target-Not Field Verifiable	# of Structures	Detailed Inspection Transmission - Aerial 7.3.4.2 - D.04	39,000	39,004	Document Review	In an Excel spreadsheet, please provide for each inspection: 1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3 Please Note: As the provided information will undergo further analysis to determine the sampling subject to further subsequent data requests, we request that the response files be transmitted via email or uploaded to BVNA's file transfer system instead of utilizing Intralinks.	Medium

DATA REQUEST

Data Request Number: 009

Data Request Date: 04-26-2023

Name: [redacted]

Email: [redacted]

WMP Category: Asset Management and Inspections

Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Small Volume Quantifiable Goal/Target	# of Hydroelectric Substations and Powerhouses	Supplemental Inspections-Hydroelectric Substations and Powerhouses 7.3.4.16 - D.08	52	52	Document Review	1. Per the data request DRU-11575, please provide inspection documentation along with photos for all fifty-two (52) inspections	Medium

DATA REQUEST

Data Request Number: 010

Data Request Date: 04-26-2023

Name: [redacted]

Email: [redacted]

WMP Category: Grid Design and System Hardening

Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Small Volume Quantifiable Goal/Target	# of PIHs	Temporary Distribution Microgrids 7.3.3.11.1 - C.07	4 Microgrid PIHs	4 Microgrid PIHs	Document Review	1. Per the data request DRU-11572, please provide completion records along with any photos for the four (4) Microgrid PIH installations	Medium

DATA REQUEST

Data Request Number: 011

Data Request Date: 04/30/23

Name: [redacted]

Email [redacted]

Phone #: [redacted]

Company: C2 Group

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of circuit miles	7.3.4.4 - D.05 - Infrared Inspections - Distribution	9,000	9,560	Document	1. Please provide the latitude and longitude locations of the PG&E structures that represent the start and stop sections of the infrared inspections miles completed and the date of the completed	1. High 2. Medium

						inspections. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we request that the response files be transmitted via email instead of utilizing Intralinks.** 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the WMP PMO QC team that includes the processes for the review and verification	

						relating to the completion of the Distribution Infrared Inspections.	
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of circuit miles	7.3.5.7 - E.03 - LiDAR Ground Inspections - Distribution	2,000	3,358.66	Document	1. Please provide the latitude and longitude locations of the PG&E structures that represent the start and stop sections of the ground LiDAR radial encroachment inspections miles completed and the dates of the completed inspections. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests,**	1. High 2. Medium

						we request that the response files be transmitted via email instead of utilizing Intralinks. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC team that includes the processes for the review and verification relating to the completion of the Ground-Based LiDAR encroachment inspections, including the geographical map	

						communicated to findings as indicated under "Lessons Learned" on Page 754 of the 2022 WMP.	
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of Line Miles	7.3.5.8 - E.04 - LiDAR Routine Inspections - Transmission	17,867	17,867	Document	1. Please provide the latitude and longitude locations of the PG&E structures that represent the start and stop sections of the LiDAR inspections, line miles completed by circuit, and the dates of the completed inspections. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent**	1. High 2. Medium

						data requests, we request that the response files be transmitted via email instead of utilizing Intralinks. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC team that includes the processes for the review and verification relating to the completion of the Routine LiDAR Transmission Inspections.	
b. Large Volume Quantifiable	# of Audits	7.3.5.13 - E.05 - Vegetation	**Quality Assurance (QA)**	**Quality Assurance (QA)**	Document	**QA Audits** 1. Distribution -	1-7. High 8. Medium

Goal/Target – Not Field Verifiable		Management - Quality Assurance and Quality Verification	**Audits** 1. Distribution - (43 audits, 95% AQL) 2. Vegetation Pole Clearing - (1 audit, 95% AQL) 3. Transmission - (1 audit, 95% AQL) 4. Procedure audit - (4 audits, 95% AQL) **Quality Verification (QV) Reviews** 1. Distribution - (1,522 Reviews, 95% AQL) 2. Transmission - (260 Reviews, 95% AQL) 3. Vegetation Pole Clearing - (3,421 Poles, 95% AQL)	**Audits** 1. 43 Distribution Audits, 99.78% Pass 2. 1 Vegetation Pole Clearing, 98.20% Pass 3. 1 Transmission, 100% Pass 4. 4 Procedure Audits, 76.00% Pass **Quality Verification (QV) Reviews** 1. 1,640 Distribution Reviews, 91.34% Pass 2. 349 Transmission Reviews, 94.21% Pass 3. 3,469 Vegetation Pole Clearing, 90.26% Pass		Please provide the latitude and longitude of the general area where the audits were completed since each audit includes multiple trees. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we request that the response files be transmitted via email instead of utilizing Intralinks.** 2. Vegetation Pole Clearing - Please provide the list of multiple poles audited in the	

						audit along with documentation of the completed audit (inspection reports, findings, and photos). 3. Transmission - Please provide the general area where the audit was completed since the audit includes multiple trees along with documentation of the completed audit (inspection reports, findings, and photos). 4. Procedure Audit - Please provide the completed audit reports and findings for the audits conducted for the procedural audits. **QV Audits** **Note: As the**	

						provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we request that the response files be transmitted via email instead of utilizing Intralinks. 5. Distribution - Please provide the latitude and longitude of the general area where the audits were completed since each audit includes multiple trees. 6. Transmission - Please provide the latitude and longitude of the general area	

						where the audits were completed since each audit includes multiple trees. 7. Vegetation Pole Clearing - Please provide the latitude and longitude of the multiple poles with completed audits. **For All QA/QV Audits** 8. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the WMP PMO QC and Electric Operations Quality Management team that includes the processes for the	

						review and verification relating to the completion of the Vegetation Management QA/QV Audit types.	
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of Distribution Substations	7.3.5.17.1 - E.06 - Defensible Space Inspections - Distribution Substation	132	132	Document	1. Please provide the distribution substation locations that completed defensible space inspections and the dates of the completed inspections. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we request that the response**	1. High 2. Medium

						files be transmitted via email instead of utilizing Intralinks. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC team that includes the processes for the review and verification relating to the completion of the Distribution Substations defensible space inspections.	
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of line reclosers and fuse savers	7.3.6.8 - F.02 - EPSS - Install Settings on Distribution Line devices	3,580	3,482 Installed 98 Exclusions **3,580 Total**	Document	1. Please provide the latitude and longitude locations of the Reclosures and	1. High 2. Medium

						Fuse Savers that had settings installed (or were part of the exclusions) and the date of the installation. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we request that the response files be transmitted via email instead of utilizing Intralinks.** 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation	

						from the Embedded QA & QC and WMP PMO QC team that includes the processes for the review and verification relating to the completion of the Distribution Substations defensible space inspections.	

DATA REQUEST

Data Request Number: 012

Data Request Date: 05-01-2023

Priority Definitions

Name: [redacted]

Email: [redacted]

WMP Category: Situational Awareness and Forecasting

Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Small Volume (<100 units) Quantifiable Goal/Target	# of DFA Sensors	Distribution Fault Anticipation (DFA) Installations 7.3.2.2.3 - B.04	40	48	Document Review	Per data request DRU-11568, please provide installation documentation and photos for the 48 DFAs installed.	High
Small Volume (<100 units) Quantifiable Goal/Target	# of Circuits	Early Fault Detection (EFD) Installations 7.3.2.2.3 - B.05	2	2	Document Review	Per data request DRU-11570, please provide installation documentation and photos for the 2 EFDs installed.	High
Small Volume	# of Circuits	Line Sensor – Installations 7.3.2.2.5 - B.06	40	63	Document Review	Per data request DRU-11571, please provide installation documentation and	High

(<100 units) Quantifiable Goal/Target						photos for the 63 line sensors installed.	

DATA REQUEST

Data Request Number: 013R

Data Request Date: 05-03-2023

Name: [redacted]

Email: [redacted]

WMP Category: **Grid Design and System Hardening**

Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Sampling Methodology	Unit Sampling	Data Request	Priority Level
Small Volume (<100 units) Quantifiable Goal/Target	# of MSOs	Distribution Line Motorized Switch Operator Replacement 7.3.3.8.3 - C.04	50 Motorized Switch Operators	57 Motorized Switch Operators	Document Review	MilStd 105E General Inspection Level II	13	In an Excel spreadsheet, please provide for each switch: 1. notification/ order/job number 2. PG&E region 3. Tier 2 and Tier 3	Medium

								As the provided response information will undergo further analysis to determine the sampling information subject to further subsequent data requests, we request that the spreadsheet file be transmitted via email or uploaded to BVNA's file transfer system instead of utilizing Intralinks.	

Small Volume (<100 units) Quantifiable Goal/Target	# of Reclosers	SCADA Recloser Equipment - Installations 7.3.3.9.1 - C.05	17	17	Document Review	MilStd 105E General Inspection Level II	5	In an Excel spreadsheet, please provide for each recloser: 1. notification/ order/job number 2. PG&E region 3. Tier 2 and Tier 3 As the provided response information will undergo further analysis to determine the sampling information subject to further subsequent data requests, we request that the spreadsheet file be	Medium

								transmitted via email or uploaded to BVNA's file transfer system instead of utilizing Intralinks.	
Small Volume (<100 units) Quantifiable Goal/Target	# of Fuse Saver Sets	Fuse Savers (Single Phase Reclosers)-Installations 7.3.3.9.2 - C.06	80 Fuse Savers	81 Fuse Savers	Document Review	MilStd 105E General Inspection Level II	13	In an Excel spreadsheet, please provide for each fuse saver: 1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3 As the provided response information will undergo further analysis to	Medium

								determine the sampling information subject to further subsequent data requests, we request that the spreadsheet file be transmitted via email or uploaded to BVNA's file transfer system instead of utilizing Intralinks.	

DATA REQUEST

Data Request: DR015R

Data Request Date: 05-05-2023

Name: [redacted]

Email: [redacted]

WMP Category: Asset Management and Inspections

Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Sampling Methodology	Unit Sampling	Data Request	Priority Level
Large Volume Quantifiable Goal/Target - Not Field Verifiable	# of Poles	Detailed Inspections - Distribution 7.3.4.1 - D.01	396,000	398,184	Document Review	MilStd 105E General Inspection Level II	800	Per Data Request DRU 11575, please provide inspection forms/photos based on unit sampling. See attached spreadsheet DRU 11575 D.01 for locations:	High

								1. 200 Tier 2 inspections 2. 600 Tier 3 inspections **Note:** As the provided response information will undergo further analysis to determine the sampling information subject to further subsequent data requests, we request that the document file be transmitted via email or uploaded to BVNA's file transfer system instead of	

								utilizing Intralinks.	
Large Volume Quantifiable Goal/Target - Not Field Verifiable	# of Structures	Detailed Inspection Transmission - Aerial 7.3.4.2 - D.04	39,000	39,004	Document Review	MilStd 105E General Inspection Level II	500	Per Data Request DRU 11575, please provide inspection forms/photos based on unit sampling. See attached spreadsheet DRU 11575 D.04 for locations:1. 125 Tier 2 inspections2. 375 Tier 3 inspections **Note**: As the provided response information will undergo further analysis to determine the sampling information subject to	Medium

								further subsequent data requests, we request that the spreadsheet file be transmitted via email or uploaded to BVNA's file transfer system instead of utilizing Intralinks.	

DATA REQUEST

Data Request Number: 017

Data Request Date: 5-1-2023

Name: [redacted]

Email: [redacted]

WMP Category: Stakeholder Cooperation & Community Engagement

Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.

Medium = Task Driven Not Critical. Data responses can be received secondary.

Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Small Volume (<100 units) Quantifiable Goal/Target	# of Meetings	Community Engagement Meetings 7.3.10.1 - J.01	22 Meetings	23 Meetings	Document Review	Per date request DRU-11585, please provide all attendance records, meeting literature and meeting outline for all 22 community engagement town hall and webinars.	Medium

DATA REQUEST

Data Request Number: 018

Data Request Date: 04/30/23

Name: [redacted]

Email: [redacted]

Phone #: [redacted]

Company: C2 Group

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
a. Large Volume Quantifiable Goal/Target - Field Verifiable	# of Weather Stations	7.3.2.1.3 - B.02 - Weather Stations - Installations and Optimizations	100	111	Field Visual/ Document	1. Please provide the the latitude and longitude locations of new weather stations installed. If any weather stations were moved to optimize their location, please provide a separate list of new optimized weather station locations, latitude and longitude, and the old location, latitude and longitude. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we**	1. High 2. Low

						request that the response files be transmitted via the BVNA FTP site instead of utilizing Intralinks. 2. Provide QA/QC Program documentation from the Embedded QA and QC and WMP PMO QC teams related to the weather station location selection, equipment selection, installation and operation.	
a. Large Volume Quantifiable Goal/Target - Field Verifiable	# of HD Cameras	7.3.2.1.4 - B.03 - High-Definition Cameras - Installations	98	100	Field Visual/ Document	1. Please provide the the latitude and longitude locations of new HD cameras installed, as well as the IP address. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we request that the response files be transmitted via the BVNA FTP site instead of utilizing Intralinks.** 2. Provide QA/QC Program documentation from the WMP PMO QC team related to the HD camera location selection, equipment selection, installation and operation.	1. High 2. Low
a. Large Volume Quantifiable Goal/Target - Field Verifiable	# of circuit miles	7.3.3.16 - C.10 - 10K Undergrounding	175	179.7	Field Visual/ Document	1. Please provide the latitude and longitude locations of PG&E structures that represent the start and stop sections of the undergrounding work completed, the date the construction of the	1. High 2. Low

						undergrounding sections that was completed, the as-builts of the completed hardened sections, and the construction standards utilized for this commitment activity. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we request that the response files be transmitted via the BVNA FTP site instead of utilizing Intralinks.**2. Provide QA/QC Program documentation from the Embedded QA and QC and WMP PMO QC teams related to the related to the undergrounding location selection, scope specified, construction and operation.	
a. Large Volume Quantifiable Goal/Target - Field Verifiable	# of circuit miles	7.3.3.17.1 - C.11 - System Hardening - Distribution	470	483	Field Visual/ Document	1. Please provide the latitude and longitude locations of PG&E structures that represent the start and stop sections of hardening work completed, the details of the hardening scope completed for each section (undergrounding, re-conductoring, pole replacements, etc.), the date the construction of the sections was completed, the as-builts of the completed hardened sections, and the construction standards	1.High 2. Low

						utilized for this commitment activity. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we request that the response files be transmitted via the BVNA FTP site instead of utilizing Intralinks.** 2. Provide QA/QC Program documentation from the Embedded QA and QC and WMP PMO QC teams related to the related to the hardening location selection, scope specified, construction and operation.	
a. Large Volume Quantifiable Goal/Target - Field Verifiable	# of surge arresters	7.3.3.17.3 - C.13 - Surge Arrester - Removals	4590	4621	Field Visual/ Document	1. Please provide the pole numbers and the latitude/longitude locations of poles with replaced surge arresters, as well as description of the new equipment installed. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we request that the response files be transmitted via the BVNA FTP site instead of utilizing Intralinks.** 2. Provide QA/QC Program documentation from the Embedded QA and QC and WMP PMO QC teams related to the location selection,	1. High 2. Low

						scope specified, construction and operation.	
a. Large Volume Quantifiable Goal/Target - Field Verifiable	# of fuses	7.3.3.7 - C.01 - Expulsion Fuse - Removal	3000	3085	Field Visual/ Document	1. Please provide the pole numbers and the latitude/longitude locations of poles with replaced fuses/cutouts, as well as description of the new equipment installed. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we request that the response files be transmitted via the BVNA FTP site instead of utilizing Intralinks.** 2. Provide QA/QC Program documentation from the Embedded QA and QC and WMP PMO QC teams related to the location selection, scope specified, construction and operation.	1. High 2. Low
a. Large Volume Quantifiable Goal/Target - Field Verifiable	# of distribution sectionalizing devices	7.3.3.8.1 - C.02 - Distribution Sectionalizing Devices - Install and SCADA commission	100	124	Field Visual/ Document	1. Please provide the pole numbers and the latitude/longitude locations of poles with distribution automated sectionalizing devices (or the latitude/longitude of the device if not pole-mounted), as well as description of the new equipment installed. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests,**	1. High 2. Low

						we request that the response files be transmitted via the BVNA FTP site instead of utilizing Intralinks.2. Provide QA/QC Program documentation from the Embedded QA and QC and WMP PMO QC teams related to the location selection, equipment specified, construction and operation.	
a. Large Volume Quantifiable Goal/Target - Field Verifiable	# of circuit miles	7.3.5.2 - E.01 - Enhanced Vegetation Management	1800	1923.8	Field Visual/ Document	1. Please provide the latitude and longitude locations of PG&E structures that represent the start and stop sections of completed Enhanced Vegetation Management work including type of Enhanced Vegetation work completed, the circuit name, miles completed, completion date, and circuit risk rank (and associated risk rank definitions). **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we request that the response files be transmitted via the BVNA FTP site instead of utilizing Intralinks.** 2. Provide QA/QC Program documentation from the Embedded QA and QC and WMP PMO QC teams related to the location selection, enhanced vegetation management	1. High 2. Low

						specified, construction and operation.	
a. Large Volume Quantifiable Goal/Target - Field Verifiable	# of distribution poles	7.3.5.2 - E.02 - Pole Clearing Program	7000	8356	Field Visual/ Document	1. Please provide the pole numbers and the latitude/longitude locations of poles not subject to PRC4292 that were inspected and cleared as needed, describe clearing completed, and date of clearing completed. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we request that the response files be transmitted via the BVNA FTP site instead of utilizing Intralinks.** 2. Provide QA/QC Program documentation from the WMP PMO QC team related the verification of work completion, and the process documentation for legacy system tracking in the poles database.	1. High 2. Low
a. Large Volume Quantifiable Goal/Target - Field Verifiable	# of distribution poles	7.3.5.2 - E.10 - Pole Clearing - per PRC 4292 in State Responsibility Areas (SRA)	80258	80208	Field Visual/ Document	1. Please provide the pole numbers and the latitude/longitude locations of poles subject to PRC4292 within SRA's that were inspected and cleared as needed, describe clearing completed, and date of clearing completed. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data**	1. High 2. Low

						requests, we request that the response files be transmitted via the BVNA FTP site instead of utilizing Intralinks. 2. Provide QA/QC Program documentation from the WMP PMO QC team related the verification of work completion, and the process documentation for legacy system tracking in the poles database.	
a. Large Volume Quantifiable Goal/Target - Field Verifiable	# of distribution poles	7.3.5.20 - E.09 - Utility Defensible Space - Distribution	7000	7168	Field Visual/ Document	1. Please provide the pole numbers and the latitude/longitude locations of poles with completed Utility Defensible Space (UDS) work completed including the date of completion. **Note: As the provided information will undergo further analysis to determine the sampling locations subject to subsequent data requests, we request that the response files be transmitted via the BVNA FTP site instead of utilizing Intralinks.** 2. Provide QA/QC Program documentation from the Embedded QA and QC and WMP PMO QC teams related the verification and documentation of work completion for the UDS program.	1. High 2. Low

DATA REQUEST

Data Request Number: 019

Data Request Date: 05/12/23

Name: [redacted]

Email: [redacted]

Phone #: [redacted]

Company: C2 Group

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
c. Small (less than 100 items) Volume Quantifiable Goal/Target	# of circuit miles	7.3.3.17.2 - C.12 - System Hardening - Transmission	32.6	37.8	Document	1. Please provide the list of locations of the system hardened conductor, including the circuit name, HFTD designation, length of hardened line, identification if the line was replaced or removed and completion date, and include associated as-builts of completed hardening work. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams relating to system hardening operations,	1. Medium

						including verification of work quality and completion in conformance with applicable standards.	
c. Small (less than 100 items) Volume Quantifiable Goal/Target	# of primary circuit miles	7.3.3.17.6 - C.15 - Butte County Rebuild - Undergrounding	55	57.8	Document	1. Please provide the list of locations of the underground lines in Butte County, including the circuit name, HFTD designation, length of underground lines, and completion date, and include associated as-builts of completed underground work. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams relating to underground operations, including verification of work quality and completion in conformance with applicable standards.	1. Medium
c. Small (less than 100 items) Volume Quantifiable Goal/Target	# of circuits	7.3.6.8 - F.04 - EPSS - Reliability Improvements	50	50	Document	1. Please provide the list, location, and any installation records of the reliability mitigations for 50 EPSS-enabled circuits including a description of the work performed per circuit. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams relating to implementing reliability mitigations, including verification of work quality and completion in conformance with applicable standards.	1. Medium

c. Small (less than 100 items) Volume Quantifiable Goal/Target	# of Transmission Substations	7.3.5.17.2 - E.07 - Defensible Space Inspections - Transmission Substation	55	55	Document	1. Please provide the list, location, applicable jurisdiction, methodology for selection, inspection records, justification for change in 100-foot clearance requirement (if applicable), and list of any applicable external factors identified inspection process for the 55 transmission substations. 2. Please provide written indication of whether locations where landowner related issues prevent PG&E from achieving 100 percent defensible space completion status are included in the target of 55 transmission substations. If landowner issues affected the completed 55 transmission substation inspections, please describe in detail the impacts per affected location. 3. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams that includes the processes for the review and verification relating to the completion of the Defensible Space Inspections - Transmission Substation.	1.Medium
c. Small (less than 100 items) Volume Quantifiable	# of Hydroelectric Substations and Powerhouses	7.3.5.17.3 - E.08 - Defensible Space Inspections - Hydroelectric	61	61	Document	1. Please provide the list, location, applicable jurisdiction, methodology for selection, inspection records, justification for change in 100-foot clearance requirement (if applicable), and list of	1.Medium

Goal/Target		Substations and Powerhouses				any applicable External Factors identified in the selection or inspection process for the 61 hydroelectric generation substations and powerhouses. 2. Please provide written indication of whether locations where landowner related issues prevent PG&E from achieving 100 percent defensible space completion status are included in the target of 61 hydroelectric generation substations and powerhouses. If landowner issues affected the completed 61 inspections, please describe in detail the impacts per affected location. 3. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams that includes the processes for the review and verification relating to the completion of the Defensible Space Inspections - Hydroelectric Substations and Powerhouses.	
d. Qualitative Goal/Target	N/A	7.3.4.14 - D.09 - Asset Inspections - Quality Assurance	N/A	N/A	Document	1. Please provide the final reports and field guides for all transmission and distribution system inspection quality audits. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the WMP PMO QC and Electric Operations Quality	1.Medium

						Management teams relating to Asset Inspections - Quality Assurance.	
d. Qualitative Goal/Target	N/A	7.3.2.1.1 - B.01 - FPI and IPW Modeling - Revision Evaluation	N/A	N/A	Document	1. Please provide the FPI and IPW Models analysis that was provided as evidence of completion and the subsequent approval from WRGSC. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams relating to FPI and IPW Modeling - Revision Evaluation.	1.Medium
d. Qualitative Goal/Target	N/A	7.3.1.3 - A.01 - Distribution Modeling Enhancements - Equipment Failure and Contact From Object	N/A	N/A	Document	1. Please provide the assessment of the WRTM models that was provided as evidence of completion and the subsequent approval from the WRGSC. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams relating to distribution modeling enhancements.	1.Medium
d. Qualitative Goal/Target	N/A	7.3.1.3 - A.02 - Transmission Modeling Enhancements - Threat and Hazard Risk Drivers	N/A	N/A	Document	1. Please provide the assessment of the WRTM models that was provided as evidence of completion and the subsequent approval from the WRGSC. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams relating to the transmission modeling enhancements.	1.Medium

d. Qualitative Goal/Target	N/A	7.3.1.4 - A.03 - PSPS Consequence Model	N/A	N/A	Document	1. Please provide the assessment of the PSPS Consequence model that was provided as evidence of completion and the subsequent approval from WRGSC. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams relating to the PSPS Consequence model.	1.Medium
d. Qualitative Goal/Target	N/A	7.3.1.5 - A.04 - Wildfire Consequence Model Enhancements - Ingress/Egress	N/A	N/A	Document	1. Please provide the Wildfire Consequence Model analysis that was provided as evidence of completion and the subsequent approval from WRGSC. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams relating to the Wildfire Consequence Model Enhancements for Ingress and Egress.	1.Medium
d. Qualitative Goal/Target	N/A	7.3.1.5 - A.05 - Wildfire Consequence Model Enhancements - Resistance to Control	N/A	N/A	Document	1. Please provide the Wildfire Consequence Model analysis that was provided as evidence of completion and the subsequent approval from WRGSC. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams relating to the Wildfire Consequence Model Enhancements for Resistance to Control.	1.Medium
d. Qualitative Goal/Target	N/A	7.3.6.8 - F.01 - EPSS - Settings	N/A	N/A	Document	1. Please provide the ATS EPSS Clearing Time Testing Final Report that was	1.Medium

		Design and Test				provided as evidence of completion. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams relating to the EPSS - Settings Design and Test.	
d. Qualitative Goal/Target	N/A	7.3.6.8 - F.03 - EPSS - Develop Enablement Standards and Procedures	N/A	N/A	Document	1. Please provide the TD-1470S EPSS Standard and supplemental documentation that were provided as evidence of completion. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams relating to EPSS - Develop Enablement Standards and Procedures.	1.Medium
d. Qualitative Goal/Target	N/A	7.3.7.1 - G.01 - Data Governance - Identify and Centralize High Priority Data	N/A	N/A	Document	1. Please provide evidence for documenting and implementing a process to identify data gaps in Foundry for critical risk drivers. 2. Please provide evidence for identifying and incorporating new high-priority datasets into Foundry in support of analytic products. 3. Please provide evidence for developing and incorporating 22 L2 Ontology objects into Foundry in support of wildfire mitigation analytics. 4. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams relating	1.Medium

						to Data Governance - Identify and Centralize High Priority Data.	
d. Qualitative Goal/Target	N/A	7.3.8.3 - H.01 - Risk Spend Efficiency - Develop and Share Governance Process	N/A	N/A	Document	1. Please provide a copy of the email sent to OEIS on 9/22/2022 and associated attachments. 2. Per the Data Request DRU11689 Response, provide the QA/QC Program documentation from the Embedded QA & QC and WMP PMO QC teams relating to Risk Spend Efficiency - Develop and Share Governance Process.	1.Medium

DATA REQUEST

Data Request Number 019R

Name: [redacted]

WMP Category: Asset Management and Inspections

Company: BVNA

Data Request Date: 05-10-2023

Email: [redacted]

Phone #: [redacted]

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Sampling Methodology	Unit Sampling	Data Request	Priority Level
Small Volume Quantifiable Goal/Target	# of Distribution Substations	Supplemental Inspections Substation Distribution 7.3.4.15 - D.06	86	86	Document Review	MilStd 105E General Inspection Level II	13	Per Data Request 11575 response, please provide inspection forms/photos based on unit sampling uploaded to Intralinks: 1. notification/o	High

								rder/job number 2. PG&E region 3. Tier 2 and Tier 3	
Small Volume Quantifiable Goal/Target	# of Transmission Substations	Supplemental Inspections Substation Transmission 7.3.4.15 - D.07	43	43	Document Review	MilStd 105E General Inspection Level II	8	Per Data Request 11575 response, please provide inspection forms/photos based on unit sampling uploaded to Intralinks: 1. notification/order/job number 2. PG&E region 3. Tier 2 and Tier 3	Medium

DATA REQUEST

Data Request Number: 020

Data Request Date: 05-15-2023

Name: [redacted]

Email: [redacted]

WMP Category: Asset Management and Inspections

Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Sampling Methodology	Unit Sampling	Data Request	Priority Level
Large Volume Quantifiable Goal/Target - Not Field Verifiable	# of Poles	Detailed Inspections - Distribution 7.3.4.1 - D.01	396,000	398,184	Document Review	800 inspections MilStd 105E General Inspection Level II	1. 200 Tier 2 inspections 2. 600 Tier 3 inspections	Per Data Request DRU11575, please provide inspection forms/photos based on unit sampling. See attached spreadsheet DRU 11575 D.01 for	High

								locations	
Large Volume Quantifiable Goal/Target - Not Field Verifiable	# of Structures	Detailed Inspections - Transmission - Ground7.3.4.2 - D.02	39,000	39,005	Document Review	500 inspections Milstd 105E General Inspection Level II	1. 125 Tier 2 inspections 2. 375 Tier 3 inspections	Per Data Request DRU11575, please provide inspection forms/photos based on unit sampling. See attached spreadsheet DRU11575 D.02 for locations.	High
Large Volume Quantifiable Goal/Target - Not Field Verifiable	# of Structures	Detailed Inspections - Transmission - Climbing 7.3.4.2 - D.03	1,800	1,835	Document Review	125 inspections Milstd 105E General Inspection Level II	1. 31 Tier 2 inspections 2. 94 Tier 3 inspections	Per Data Request DRU11575, please provide inspection forms/photos based on unit sampling. See attached spreadsheet DRU11575 D.03 for locations.	Medium
Large Volume Quantifiable	# of Structures	Detailed Inspection	39,000	39,004	Document Review	500 inspections	1. 125 Tier 2 inspections	Per Data Request DRU	Medium

Goal/Target - Not Field Verifiable		Transmission - Aerial 7.3.4.2 - D.04				MilStd 105E General Inspection Level II	2. 375 Tier 3 inspections	11575, please provide inspection forms/photos based on unit sampling. See attached spreadsheet DRU 11575 D.04 for locations.	

DATA REQUEST

Data Request Number 021

Name: [redacted]

WMP Category: Asset Management and Inspections

Company: BVNA

Data Request Date: 05-15-2023

Email: [redacted]

Phone #: [redacted]

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Sampling Methodology	Unit Sampling	Data Request	Priority Level
Large Volume Quantifiable Goal/Target - Non-Field Verifiable	# of Closed Distribution Tags	HFTD/HFRA Open Tag Reduction - Distribution 7.3.4.17 - D.10	55,000	49,951	Document Review	MilStd 105E General Inspection Level II	1. 125 Tier 2 inspections 2. 375 - Tier 3 inspections	Per Data Request 11575, please provide tag documentation/photos based on unit sampling. See attached spreadsheet DRU11575 D.10 for locations.	Low
Large Volume Quantifiable Goal/Target - Non-Field	# of Closed Transmission Tags	HFTD/HFRA Open Tag Reduction - Transmission	18,000	21,145	Document Review	MilStd 105E General Inspection Level II	1. 79 Tier 2 inspections 2. 236 Tier 3	Per Data Request 11575, please provide tag documentation/p	Low

Verifiable		7.3.4.17 - D.11					inspections	hotos based on unit sampling. See attached spreadsheet DRU11575 D.11 for locations.	

DATA REQUEST

Data Request 022

Name: [redacted]

WMP Category: Grid Design and System Hardening

Company: BVNA

Data Request Date: 05-16-2023

Email: [redacted]

Phone #: [redacted]

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units		Sections	Target	Actual	Method	Sampling Methodology	Unit Sampling	Data Request	P
Small Volume Quantifiable Goal/Target	# of MSOs		Distribution Line Motorized Switch Operator Replacement 7.3.3.8.3 - C.04	50 Motorized Switch Operators	57 Motorized Switch Operators	Document Review	MilStd 105E General Inspection Level II	13 Motorized Switch Operators	Per Data Request 11572, please provide installation documentation/ photos based on unit sampling. See attached spreadsheet DRU11572 C.04 for locations.	

Small Volume Quantifiable Goal/Target	# of Reclosers		SCADA Recloser Equipment - Installations 7.3.3.9.1 - C.05	17 SCADA Equipment - Installations	17 SCADA Equipment - Installations	Document Review	MilStd 105E General Inspection Level II	5 SCADA Recloser Equipment- Installations	Per Data Request 11572, please provide installation documentation/photos based on unit sampling. See attached spreadsheet DRU11572 C.05 for locations.	M
Large Volume Quantifiable Goal/Target - Non-Field Verifiable	# of Fuse Saver Sets		Fuse Savers (Single Phase Reclosers)- Installations 7.3.3.9.2 - C.06	80 Fuse Savers Installation	81 Fuse Savers Installation	Document Review	MilStd 105E General Inspection Level II	13 Fuse Savers Installations	Per Data Request 11572, please provide installation documentation/photos based on unit sampling. See attached spreadsheet DRU11572 C.06 for locations.	

DATA REQUEST

Data Request Number: 023

Data Request Date: 05/30/23

Priority Definitions

Name: [redacted]

Email: [redacted]

Phone #: [redacted]

Company: C2 Group

Preferred Point of Contact: Email

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of circuit miles	7.3.4.4 - D.05 - Infrared Inspections - Distribution	9000	9560	Document / Interview	1. Please provide the documentation for the completed infrared inspections for the locations identified in the attached spreadsheet "D.05 Distribution	Medium

						Infrared Inspection Sample". **If detailed documentation is not available or easily transmit, please schedule a SME interview to review and discuss the progress on this initiative.**	
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of circuit miles	7.3.5.7 - E.03 - LiDAR Ground Inspections - Distribution	2000	3358.66	Document / Interview	1. Please provide the documentation for the completed lidar inspections completed for distribution spans in the circuits identified in the attached spreadsheet "E.03 Lidar Ground Inspections Distribution Sample". **If**	Medium

						detailed documentation is not available or easily transmittable, please schedule a SME interview to review and discuss the progress on this initiative.	
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of Audits	7.3.5.13 - E.05 - Vegetation Management - Quality Assurance and Quality Verification	Quality Assurance (QA) Audits 1. Distribution - (43 audits, 95% AQL) 2. Vegetation Pole Clearing – (1 audit, 95% AQL) 3. Transmission - (1 audit, 95% AQL) 4. Procedure audit - (4 audits, 95% AQL) Quality Verification (QV)	Quality Assurance (QA) Audits 1. 43 Distribution Audits, 99.78% Pass 2. 1 Vegetation Pole Clearing, 98.20% Pass 3. 1 Transmission, 100% Pass 4. 4 Procedure Audits, 76.00% Pass Quality Verification (QV) Reviews 1. 1,640	Document / Interview	1. Please provide the documentation for the completed distribution vegetation management audits identified in the attached spreadsheet "E.05 Vegetation Management Distribution QA Sample". **If detailed documentation is not available or easily transmittable,**	Medium

			Reviews 1. Distribution - (1,522 Reviews, 95% AQL) 2. Transmission – (260 Reviews, 95% AQL) 3. Vegetation Pole Clearing - (3,421 Poles, 95% AQL)	Distribution Reviews, 91.34% Pass 2. 349 Transmission Reviews, 94.21% Pass 3. 3,469 Vegetation Pole Clearing, 90.26% Pass		**please schedule a SME interview to review and discuss the progress on this initiative.** 2. Please provide the final report for the QVVM - Distribution Audit. **If detailed documentation is not available or easily transmittable, please schedule a SME interview to review and discuss the progress on this initiative.** 3. Please provide the final report for the QVVM - Pole Clearing Audit. **If detailed documentation is not available or easily transmittable, please schedule**	

						a SME interview to review and discuss the progress on this initiative. 4. Please provide the final report for the QVVM - Transmission Audit. **If detailed documentation is not available or easily transmittable, please schedule a SME interview to review and discuss the progress on this initiative.**	
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of Distribution Substations	7.3.5.17.1 - E.06 - Defensible Space Inspections - Distribution Substation	132	132	Document / Interview	1. Please provide documentation for defensible space inspections completed for the distribution substation locations in the attached spreadsheet "E.06 Defensible	Medium

						Space Inspections Sample". **If detailed documentation is not available or easily transmittable, please schedule a SME interview to review and discuss the progress on this initiative.**	
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of line reclosers and fuse savers	7.3.6.8 - F.02 - EPSS - Install Settings on Distribution Line devices	3580	3,482 Installed 98 Exclusions 3,580 Total	Document / Interview	1. Please provide documentation for the setting implementation for the locations in the attached spreadsheet "F.02 EPSS Setting Sample". **If detailed documentation is not available or easily transmittable, please schedule a SME interview to review and discuss the**	Medium

						progress on this initiative.	

DATA REQUEST

Data Request Number: 024

Data Request Date: 06/06/23

Name: [redacted]

Email: [redacted]

Phone #: [redacted]

Company: C2 Group

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of line reclosers and fuse savers	7.3.6.8 - F.02 - EPSS - Install Settings on Distribution Line devices	3,580	3,482 Installed 98 Exclusions **3,580 Total**	Document	1. In response to DRU11581 Question No. 002 Attachment DRU11581_Q02_F02 EPSS Device Capability_202207_25_V6_CONF .xlsx lists one line device with an EPSS Capable (COMP) Date of 9/21/2022 after the target date for completion of 8/1/2022. There are no comments for this device identifying it as an exclusion. Please clarify if this device was an exclusion with	High

						EPSS settings installed after the target date. 2. In response to DRU11581 Question No. 002 Attachment DRU11581_Q02_F02 EPSS Device Capability_202207_25_V6_CONF .xlsx lists 112 line devices with no entry for EPSS Capable (COMP) Date. Each of the 112 devices have a comment to clarify the device status. Please confirm if the 112 devices that do not have an entry for EPSS Capable (COMP) Date represent exclusions.	
Verification of Funding	N/A	7.3.4.8 - LiDAR Inspections of Transmission Electric Lines and Equipment	$ 11,003.00	($6,283)	Document	Please provide additional information or explanation for the Capital underspent funds	High
Verification of Funding	N/A	7.3.2.2.5 - Continuous monitoring sensors, Line Sensor Devices	$ 7,813.00	($5,522)	Document	Please provide additional information or explanation for the Capital underspent funds	High
Verification of Funding	N/A	7.3.5.2 - Detailed inspections and management practices for	$ 1,370,788.00	($32,630)	Document	Please provide additional information or explanation for the Expense underspent funds	High

		vegetation clearances around distribution electrical lines and equipment					
Verification of Funding	N/A	7.3.3.11.4 - Fixed Power Solutions	$ 7,800.00	($5,696)	Document	Please provide additional information or explanation for the Expense underspent funds	High
Verification of Funding	N/A	7.3.9.5 - Preparedness and planning for service restoration	$ 15,794.00	($5,443)	Document	Please provide additional information or explanation for the Expense underspent funds	High
Verification of Funding	N/A	7.3.5.8 - Remote sensing inspections of vegetation around transmission electric lines and equipment	$ 13,000.00	($5,230)	Document	Please provide additional information or explanation for the Expense underspent funds	High
Verification of Funding	N/A	7.3.3.12.4 - Other corrective action, Maintenance, Distribution	$ 93,704.00	($11,194)	Document	Please provide additional information or explanation for the Expense underspent funds	High

DATA REQUEST

Data Request Number: 025

Data Request Date: 06/07/23

Priority Definitions

Name: [redacted]

Email: [redacted]

Phone #: [redacted]

Company: C2 Group

Preferred Point of Contact: Email

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
c. Small (less than 100 items) Volume Quantifiable Goal/Target	# of circuit miles	7.3.3.17.2 - C.12 - System Hardening - Transmission	32.6	37.8	Document	1. Please clarify the FISD for the TRINITY-COTTONWOOD 115KV PH. 3 line. The inspection date listed in the provided document "44.5 DRU11572_Q012 _Atch04_Trinity_ Cottonwood_As-Built_CONF" is	1. Medium

						12/20/2021. PG&E's Q4 update lists the completion date as December 2022. In the provided document "44.2 DRU11572_Q012 _Atch01_2022_ WMP_System_H ardening_Work_ Tracker_CONF", in the tab "CN24 Completion", the FISD date is listed as 1/7/2022.	
c. Small (less than 100 items) Volume Quantifiable Goal/Target	# of primary circuit miles	7.3.3.17.6 - C.15 - Butte County Rebuild - Undergrounding	55	57.8	Document	1. Please describe the apparent discrepancies between the undergrounded distances listed in the provided document "45.2 DRU11572_Q015 _Atch01_C.15_B utte UG_Validation Report_R1" and	1. Medium

						the provided as-built drawings. Please clarify the definitions of the Mat Codes 08W, 95F, and 950, and how/if these codes affected the calculating of these distances toward this initiative. Please provide any additional information that will assist with validating the reported distances.	
c. Small (less than 100 items) Volume Quantifiable Goal/Target	# of circuits	7.3.6.8 - F.04 - EPSS - Reliability Improvements	50	50	Document	1. Please provide a copy of the EPSS deployment workplan that is referenced in the provided document "51.7 DRU11581_Q04_Atch06_2022 WMP-F.04 EPSS Reliability Improvements-	1. Medium

						Define_CONF".	

DATA REQUEST

Data Request Number: 026

Data Request Date: 06-14-2023

Name: [redacted]
WMP Category: **Asset Management and Inspections**

Email: [redacted]

Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Large Volume Quantifiable Goal/Target - Non-Field Verifiable	# of Poles	Detailed Inspections-Distribution 7.3.4.1 - D.01	396,000	398,184	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done and confirming its successful completion.	High
Large Volume Quantifiable Goal/Target - Non-Field	# of Structures	Detailed Inspection Transmission - Ground	39,000	39,005	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as	High

Verifiable		7.3.4.2 - D.02				well as measures for verifying the quality of work done and confirming its successful completion.	
Large Volume Quantifiable Goal/Target - Non-Field Verifiable	# of Structures	Detailed Inspection Transmission - Climbing 7.3.4.2 - D.03	1,800	1,835	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done and confirming its successful completion.	Medium
Large Volume Quantifiable Goal/Target - Non-Field Verifiable	# of Closed Distribution Tags	HFTD/HFRA Open Tag Reduction-Distribution 7.3.4.17 - D.10	55,000	49,951	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done and confirming its successful completion.	Low
Large Volume Quantifiable Goal/Target - Non-Field Verifiable	# of Closed Transmission Tags	HFTD/HFRA Open Tag Reduction-Transmission 7.3.4.17 - D.11	18,000	21,145	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done and confirming its successful completion.	Low

DATA REQUEST

Data Request Number: 027

Data Request Date: 06-14-2023

Name: [redacted]
WMP Category: Asset Management and Inspections

Email: [redacted]
Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Large Volume Quantifiable Goal/Target-Not Field Verifiable	# of Structures	Detailed Inspection Transmission - Aerial 7.3.4.2 - D.04	39,000	39,004	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done and confirming its successful completion.	Medium

DATA REQUEST

Data Request Number: 028

Data Request Date: 06-14-2023

Name: [redacted]
WMP Category: **Grid Design and System Hardening**

Email: [redacted]

Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Small Volume (<100 units) Quantifiable Goal/Target	# of Switches	Transmission Line Sectionalizing-Install and SCADA commission 7.3.3.8.2 - C.03	15 Line Switches	18 Line Switches	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets	Medium

						applicable standards, as well as measures for verifying the quality of work done and confirming its successful completion.	
Small Volume (<100 units) Quantifiable Goal/Target	# of MSOs	Distribution Line Motorized Switch Operator Replacement 7.3.3.8.3 - C.04	50 Motorized Switch Operators	57 Motorized Switch Operators	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done and confirming its	Medium

						successful completion.	
Small Volume (<100 units) Quantifiable Goal/Target	# of Reclosers	SCADA Recloser Equipment - Installations 7.3.3.9.1 - C.05	17	17	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done and confirming its successful completion.	Medium
Small Volume (<100 units) Quantifiable Goal/Target	# of Fuse Saver Sets	Fuse Savers (Single Phase Reclosers)- Installations 7.3.3.9.2 - C.06	80 Fuse Savers	81 Fuse Savers	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all	Medium

						relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done and confirming its successful completion.	
Small Volume (<100 units) Quantifiable Goal/Target	# of PIHs	Temporary Distribution Microgrids 7.3.3.11.1 - C.07	4 Microgrid PIHs	4 Microgrid PIHs	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable	Medium

						standards, as well as measures for verifying the quality of work done and confirming its successful completion.	
Small Volume (<100 units) Quantifiable Goal/Target	# of Fuses	Rincon Transformer Fuse-Replacement 7.3.3.11.2 - C.08	1 Circuit Switcher	1 Circuit Switcher	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done and confirming its successful	Medium

						completion.	
Small Volume (<100 units) Quantifiable Goal/Target	# of Sites	Emergency Back-up Generation 7.3.3.11.3 - C.09	15 sites	15 sites	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done and confirming its successful completion.	Medium
Small Volume (<100 units) Quantifiable Goal/Target	# of Remote Grids	Remote Grid - Operate New SPS Units 7.3.3.17.5 - C.14	2 SPS Units	2 SPS Units	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC	Medium

						documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done and confirming its successful completion.	

DATA REQUEST

Data Request Number: 029

Data Request Date: 06-14-2023

Name: [redacted]

WMP Category: Stakeholder Cooperation & Community Engagement

Email: [redacted]

Phone #: [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.

Medium = Task Driven Not Critical. Data responses can be received secondary.

Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Small Volume (<100 units) Quantifiable Goal/Target	# of Meetings	Community Engagement Meetings 7.3.10.1 - J.01	22 Meetings	23 Meetings	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done and confirming its successful completion.	Medium

DATA REQUEST

Data Request Number: 030

Data Request Date: 06-14-2023

Name: [redacted]
WMP Category: Situational Awareness and Forecasting

Email: [redacted]

Phone [redacted]

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

High = Critical Path, Task Dependent. Need to receive this data response first before all others.
Medium = Task Driven Not Critical. Data responses can be received secondary.
Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Small Volume (<100 units) Quantifiable Goal/Target	# of DFA Sensors	Distribution Fault Anticipation (DFA) Installations 7.3.2.2.3 - B.04	40	48	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done	High

						and confirming its successful completion.	
Small Volume (<100 units) Quantifiable Goal/Target	# of Circuits	Early Fault Detection (EFD) Installations 7.3.2.2.3 - B.05	2	2	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the quality of work done and confirming its successful completion.	High
Small Volume (<100 units) Quantifiable Goal/Target	# of Circuits	Line Sensor - Installations 7.3.2.2.5 - B.06	40	63	Document Review	1. Please detail the QA/QC program associated with this initiative and submit all relevant QA/QC documentation. This should encompass procedures to ensure the work meets applicable standards, as well as measures for verifying the	High

						quality of work done and confirming its successful completion.	

Appendix D – SME Interview Summary

Item No.	2022 WMP Activities	Initiative Category	Initiative Name	SME Name, Title	Interview Date	Summary
1	Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management and Inspections	7.3.5.7 - E.03 - LiDAR Ground Inspections - Distribution	[redacted]	06/05/23	LiDAR Ground Inspections for Distribution - An explanation of the LiDAR inspection process touching on collection, processing, review, and creation of work orders from findings. PG&E to provide screenshots of lidar data in response to follow-up data request.
2	Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management and Inspections	7.3.5.13 - E.05 - Vegetation Management - Quality Assurance and Quality Verification	[redacted]	06/14/23	Quality Verification for Vegetation Management - Demonstration of the results of quality verification reviews for vegetation management activities. Individual quality verification observations are aggregated to determine the results of the overall review to establish conformance with the quality target.
3	Large Volume Quantifiable Goal/Target - Field Verifiable	Enhanced Vegetation Management	7.3.5.2 - E.01 - Enhanced Vegetation Management	[redacted]	06/12/23	GIS Data for Enhanced Vegetation Management - Demonstration of the GIS system used for planning and tracking enhanced vegetation management work. Discussion of how the team manages the data to conform with operational requirements.

Appendix E – 2022 WMP Funding Verification Summary ($ Thousands)

Initiative Category	2022 Initiative Number	Initiative Name	2022 WMP Page No.	2022 Exp. Planned	2022 Exp. Actual	2022 Exp. Vari.	2022 Exp. % Variance (Under 100%)	2022 Cap. Planned	2022 Cap. Actual	2022 Cap. Variance	2022 Cap. % Variance (Under 100%)	2022 Total Planned	2022 Total Actual	2022 Total Variance	Funding Discrepancy Amount	Detail of Funding Discrepancy
7.3.1 Risk Assessment and Mapping	7.3.1.1	A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment	381	$0	$0	$0		$910	$511	-$399	-44%	$910	$511	-$399	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $399.3K of the planned $0.91M, 44% of the total Capital amount initially allocated for this initiative.
7.3.1 Risk Assessment and Mapping	7.3.1.2	Climate-driven risk map and modeling based on various relevant weather scenarios	384	$1,572	$2,685	$1,113	71%	$0	$0	$0		$1,572	$2,685	$1,113	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.1 Risk Assessment and Mapping	7.3.1.3	Ignition probability mapping showing the probability of ignition along the electric lines and equipment	358	$0	$0	$0		$910	$511	-$399	-44%	$910	$511	-$399	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $399.3K of the planned $0.91M, 44% of the total Capital amount initially allocated for this initiative.
7.3.1 Risk Assessment and Mapping	7.3.1.4	Initiative mapping and estimation of wildfire and PSPS	361	$168	$168	$0	0%	$0	$0	$0		$168	$168	$0	Expense No Variance	

		risk-reduction impact													No Capital amount was planned or spent for this WMP initiative.	
7.3.1 Risk Assessment and Mapping	7.3.1.5	Match drop simulations showing the potential wildfire consequence of ignitions that occur along the electric lines and equipment	364	$3,200	$3,189	-$11	0%	$1,194	$1,170	-$24	-2%	$4,394	$4,359	-$35	Expense Underspend: Variance Amount $0M - $1M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $10.9K of the planned $3.2M, 0% of the total Expense amount initially allocated for this initiative. PG&E did not spend $23.9K of the planned $1.19M, 2% of the total Capital amount initially allocated for this initiative.
7.3.10 Stakeholder Cooperation & Community Engagement	7.3.10.1	Community engagement	812	$20,616	$16,347	-$4,269	-21%	$0	$0	$0		$20,616	$16,347	-$4,269	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $4.27M of the planned $20.62M, 21% of the total Expense amount initially allocated for this initiative.
7.3.10 Stakeholder Cooperation & Community Engagement	7.3.10.2	Cooperation and best practice sharing with agencies outside CA	972	$193	$180	-$14	-7%	$0	$0	$0		$193	$180	-$14	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $13.6K of the planned $0.19M, 7% of the total Expense amount initially allocated for this initiative.

7.3.10 Stakeholder Cooperation & Community Engagement	7.3.10.3	Cooperation with suppression agencies	976	$4,532	$4,788	$256	6%	$0	$0	$0		$4,532	$4,788	$256	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.10 Stakeholder Cooperation & Community Engagement	7.3.10.4	Forest service and fuel reduction cooperation and joint roadmap	979	$5,133	$3,099	-$2,034	-40%	$0	$0	$0		$5,133	$3,099	-$2,034	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $2.03M of the planned $5.13M, 40% of the total Expense amount initially allocated for this initiative.
7.3.10 Stakeholder Cooperation & Community Engagement	7.3.10.5	Other, PMO and General Wildfire Support	981	$24,193	$27,420	$3,227	13%	$0	$0	$0		$24,193	$27,420	$3,227	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.2 Situational Awareness and Forecasting	7.3.2.1.1	Advanced weather monitoring and weather stations, Numerical Weather Prediction	367	$789	$827	$38	5%	$0	$0	$0		$789	$827	$38	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.2 Situational Awareness and Forecasting	7.3.2.1.2	Advanced weather monitoring and weather stations, Fuel Moisture	401	$598	$552	-$46	-8%	$0	$0	$0		$598	$552	-$46	Expense Underspend: Variance Amount $0M - $1M	PG&E did not spend $46.3K of the planned $0.6M, 8% of the total Expense amount initially allocated for this initiative.

		Sampling and Modeling													No Capital amount was planned or spent for this WMP initiative.	
7.3.2 Situational Awareness and Forecasting	7.3.2.1.3	Advanced weather monitoring and weather stations, Weather Stations	374	$1,595	$1,934	$339	21%	$6,181	$5,625	-$556	-9%	$7,777	$7,559	-$217	Expense Overspend Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $556.3K of the planned $6.18M, 9% of the total Capital amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.1.4	Advanced weather monitoring and weather stations, Wildfire Cameras	378	$11,211	$11,878	$667	6%	$0	$0	$0		$11,211	$11,878	$667	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.2 Situational Awareness and Forecasting	7.3.2.1.5	Advanced weather monitoring and weather stations, Fire Detection & Alerting	412	$341	$312	-$29	-8%	$0	$0	$0		$341	$312	-$29	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $28.9K of the planned $0.34M, 8% of the total Expense amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.1.6	Advanced weather monitoring and weather stations, Other Meteorology Tools and Upgrades	414	$1,020	$400	-$620	-61%	$0	$0	$0		$1,020	$400	-$620	Expense Underspend: Variance Amount $0M - $1M No Capital	PG&E did not spend $619.7K of the planned $1.02M, 61% of the total Expense amount initially allocated for this initiative.

															amount was planned or spent for this WMP initiative.	
7.3.2 Situational Awareness and Forecasting	7.3.2.2.1	Continuous monitoring sensors, Electric Transmission SEL T400L	420	$0	$0	$0		$0	$135	$135		$0	$135	$135	No Expense amount was planned or spent for this WMP Initiative. Capital Overspend	
7.3.2 Situational Awareness and Forecasting	7.3.2.2.2	Continuous monitoring sensors, SmartMeter™ Partial Voltage Detection (Formerly Known as Enhanced Wires Down Detection)	422	$0	$0	$0		$0	$7	$7		$0	$7	$7	No Expense amount was planned or spent for this WMP Initiative. Capital Overspend	
7.3.2 Situational Awareness and Forecasting	7.3.2.2.3	Continuous monitoring sensors, Distribution Fault Anticipation Technology and Early Fault Detection	392	$2,573	$265	-$2,309	-90%	$14,579	$9,942	-$4,637	-32%	$17,153	$10,207	-$6,946	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $2.31M of the planned $2.57M, 90% of the total Expense amount initially allocated for this initiative. PG&E did not spend $4.64M of the planned $14.58M, 32% of the total Capital amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.2.4	Continuous monitoring sensors, Sensor IQ	429	$0	$27	$27		$0	$0	$0		$0	$27	$27	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	

7.3.2 Situational Awareness and Forecasting	7.3.2.2.5	Continuous monitoring sensors, Line Sensor Devices	401	$0	$1,233	$1,233		$7,813	$2,291	-$5,522	-71%	$7,813	$3,524	-$4,289	Expense Overspend Capital Underspend: Variance Amount $5M - $10M	PG&E did not spend $5.52M of the planned $7.81M, 71% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.2.2.5_DR_BVNA_024_Q006_R0011, PG&E explained the variance in the Capital Spending as Follows: "The underspend can be attributed to: 1. deferred IT Infrastructure upgrade costs, which were caused by delayed standards approval for line sensor product; and 2. efficiencies from lower installation costs due to optimized routing through concentrating the work in specific geographical divisions. Please note that this IT infrastructure upgrade work was only deferred, not canceled, and we are currently scheduling when this work will be performed." Additionally, PG&E indicated in the DR11935 response that the Capital spend was $2,407 for the effort against the target

																spend which is greater than the reported $2,291 from PG&E"s 2022 ARC Report.
7.3.2 Situational Awareness and Forecasting	7.3.2.2.6	Continuous monitoring sensors, Distribution Arcing Fault Signature Library	434	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was planned or spent for this WMP initiative.	
7.3.2 Situational Awareness and Forecasting	7.3.2.2.7	Continuous monitoring sensors, DTS FAST	437	$600	$596	-$4	-1%	$19,452	$2,958	-$16,494	-85%	$20,052	$3,554	-$16,498	Expense Underspend: Variance Amount $0M - $1M Capital Underspend: Variance Amount $10M - $20M	PG&E did not spend $4K of the planned $0.6M, 1% of the total Expense amount initially allocated for this initiative. PG&E did not spend $16.49M of the planned $19.45M, 85% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Decreased program forecast due to budgetary reduction. Program paused transmission efforts in late 2021. In 2022, the program did not receive the

																required funding necessary to continue efforts to deploy DTS-FAST. In the interim, the program is looking to make the system more scalable and cost effective to deploy."
7.3.2 Situational Awareness and Forecasting	7.3.2.3	Fault indicators for detecting faults on electric lines and equipment	440	$0	$0	$0		$0	$79	$79		$0	$79	$79	No Expense amount was planned or spent for this WMP Initiative. Capital Overspend	
7.3.2 Situational Awareness and Forecasting	7.3.2.4	Forecast of a fire risk index, fire potential index, or similar	442	$1,867	$1,523	-$345	-18%	$0	$3	$3		$1,867	$1,525	-$342	Expense Underspend: Variance Amount $0M - $1M Capital Overspend	PG&E did not spend $344.6K of the planned $1.87M, 18% of the total Expense amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.5	Personnel monitoring areas of electric lines and equipment in elevated fire risk conditions	444	$4,841	$3,957	-$884	-18%	$230	$9	-$221	-96%	$5,071	$3,966	-$1,106	Expense Underspend: Variance Amount $0M - $1M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $884.4K of the planned $4.84M, 18% of the total Expense amount initially allocated for this initiative. PG&E did not spend $221.4K of the planned $0.23M, 96% of the total Capital amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.6	Weather forecasting and estimating impacts on electric lines and equipment	448	$1,108	$746	-$362	-33%	$1,023	$729	-$294	-29%	$2,131	$1,475	-$656	Expense Underspend: Variance Amount $0M - $1M	PG&E did not spend $361.8K of the planned $1.11M, 33% of the total Expense amount initially allocated for this initiative.

															Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $294.1K of the planned $1.02M, 29% of the total Capital amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.7	Other, Wildfire Safety Operations Center (WSOC)	450	$6,981	$4,269	-$2,712	-39%	$125	$23	-$101	-81%	$7,106	$4,293	-$2,813	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $2.71M of the planned $6.98M, 39% of the total Expense amount initially allocated for this initiative. PG&E did not spend $101.4K of the planned $0.12M, 81% of the total Capital amount initially allocated for this initiative.
7.3.2 Situational Awareness and Forecasting	7.3.2.8	Other, Meteorology Analytics/Operations Center	455	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was planned or spent for this WMP initiative.	
7.3.3 Grid Design and System Hardening	7.3.3.1	Capacitor maintenance and replacement program	456	$2,369	$2,843	$474	20%	$10,549	$11,855	$1,306	12%	$12,918	$14,699	$1,780	Expense Overspend Capital Overspend	
7.3.3 Grid Design and System Hardening	7.3.3.10	Maintenance, repair, and replacement of connectors, including hotline clamps	497	$14,597	$10,251	-$4,346	-30%	$3,135	$2,406	-$729	-23%	$17,732	$12,657	-$5,074	Expense Underspend: Variance Amount $1M - $5M Capital Underspend:	PG&E did not spend $4.35M of the planned $14.6M, 30% of the total Expense amount initially allocated for this initiative. PG&E did not spend $728.7K of the planned

															Variance Amount $0M - $1M	$3.13M, 23% of the total Capital amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.11.1	Mitigation of impact on customers and other residents affected during PSPS event, Generation for PSPS Mitigation	470	$112,690	$40,590	-$72,100	-64%	$23,325	$11,360	-$11,965	-51%	$136,014	$51,950	-$84,064	Expense Underspend: Variance Amount over $50M Capital Underspend: Variance Amount $10M - $20M	PG&E did not spend $72.1M of the planned $112.69M, 64% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: 1) Temporary generation rental cost - lower due to 2021 over-accrual adjustment ($19M) and overall rental quantity (# of MWs) 2) Reduced operating costs incurred driven by minimal PSPS activity" PG&E did not spend $11.96M of the planned $23.32M, 51% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Lower spend on CMEP

																capital projects due to long lead time for capital projects identification and development - Distribution Microgrids PIH: Actual costs lower due to much of work completed prior to 2022, also updated workplan for 4 locations, 3 improvement projects."
7.3.3 Grid Design and System Hardening	7.3.3.11.2	Mitigation of impact on customers and other residents affected during PSPS event, Substation activities to enable reduction of PSPS impacts	486	$0	$0	$0		$681	$864	$183	27%	$681	$864	$183	No Expense amount was planned or spent for this WMP Initiative. Capital Overspend	
7.3.3 Grid Design and System Hardening	7.3.3.11.3	Mitigation of impact on customers and other residents affected during PSPS event, Emergency Back-up Generation – PG&E Service Centers & Materials Distribution Centers	489	$0	$0	$0		$18,000	$16,670	-$1,330	-7%	$18,000	$16,670	-$1,330	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $1.33M of the planned $18M, 7% of the total Capital amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.11.4	Fixed Power Solutions	522	$7,800	$2,104	-$5,696	-73%	$0	$0	$0		$7,800	$2,104	-$5,696	Expense Underspend: Variance Amount $5M - $10M No Capital amount was planned or	PG&E did not spend $5.7M of the planned $7.8M, 73% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within

															spent for this WMP initiative.	DRU11935_Audit_IE_WSD-022_7.3.3.11.4_DR_BVNA_024_Q001_R001, PG&E explained the variance in the Expense Spending as Follows: "The decrease from the forecast to the actual spend was due to the following factors: 1. the time required to design the programs causing the programs to start later in 2022; 2. the time required to execute the necessary third party contracts causing the program to start later in 2022; 3. delays resulting from global supply chain constraints on materials; and 4. weather-related delays on installation. However, please note that both programs are multi-year efforts and will continue in 2023 and beyond, meaning that although this money was not spent in 2022 it will be spent in future years as we continue to the roll-out of these programs."
7.3.3 Grid Design and System Hardening	7.3.3.12.1	Other corrective action, Distribution Substation	527	$977	$837	-$140	-14%	$0	$0	$0		$977	$837	-$140	Expense Underspend: Variance Amount $0M - $1M No Capital amount was	PG&E did not spend $140.3K of the planned $0.98M, 14% of the total Expense amount initially allocated for this initiative.

															planned or spent for this WMP initiative.	
7.3.3 Grid Design and System Hardening	7.3.3.12.2	Other corrective action, Transmission Substation	531	$504	$1,136	$632	125%	$0	$0	$0		$504	$1,136	$632	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.3 Grid Design and System Hardening	7.3.3.12.3	Other corrective action, Maintenance, Transmission	534	$127,976	$90,649	-$37,326	-29%	$412,055	$464,594	$52,539	13%	$540,030	$555,243	$15,213	Expense Underspend: Variance Amount $20M - $50M Capital Overspend	PG&E did not spend $37.33M of the planned $127.98M, 29% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - reclassification of Bay Towers costs to capital - Lower volume of work for wooden structure (MAT ICW) compared to plan; also unit cost was favorable due to efficiency/savings "
7.3.3 Grid Design and System Hardening	7.3.3.12.4	Other corrective action, Maintenance, Distribution	537	$93,704	$82,510	-$11,194	-12%	$196,541	$325,804	$129,263	66%	$290,245	$408,314	$118,069	Expense Underspend: Variance Amount $10M - $20M	PG&E did not spend $11.19M of the planned $93.7M, 12% of the total Expense amount initially allocated for this initiative. Per the Variance

															Capital Overspend	Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.3.12.4_DR_BVNA_024_Q004_R001, PG&E explained the variance in the Expense Spending as Follows: "The majority of the underspend was the result of an inadvertent budgeting error. The budget for this initiative did not reflect all of the assumptions necessary because there was a missing line item in the Distribution Maintenance program of approximately $22M, which was not reflected in the initial budgeted amount for this initiative, due to inconsistencies in the master data. The Budget forecasted completing 26.121k units, with a targeted budget unit cost of $2.3k per unit (totaling approximately $59.M). However, the actual units completed were 19.353k, with an actual unit cost of $2.8k per unit (totaling approximately $53.2M). Additionally, there was a higher find rate of B tags in the non-HFTD areas of our territory, which impacted the execution of work in

															the HFTD areas. Please note that there were no quantitative or qualitative targets set for this work in our 2022 WMP."
7.3.3 Grid Design and System Hardening	7.3.3.12.5	Other corrective action, Generation Substation	540	$2,839	$3,354	$514	18%	$0	$0	$0		$2,839	$3,354	$514	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.3 Grid Design and System Hardening	7.3.3.13	Pole loading infrastructure hardening and replacement program based on pole loading assessment program	543	$154	$0	-$154	-100%	$9,236	$16,365	$7,129	77%	$9,391	$16,365	$6,974	Expense Underspend: Variance Amount $0M - $1M Capital Overspend	PG&E did not spend $154.5K of the planned $0.15M, 100% of the total Expense amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.14	Transformers maintenance and replacement	546	$1,335	$661	-$674	-50%	$22,485	$29,052	$6,567	29%	$23,820	$29,713	$5,893	Expense Underspend: Variance Amount $0M - $1M Capital Overspend	PG&E did not spend $673.8K of the planned $1.34M, 50% of the total Expense amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.15	Transmission tower maintenance and replacement	549	$50,261	$68,705	$18,443	37%	$154,981	$66,780	-$88,201	-57%	$205,242	$135,485	-$69,757	Expense Overspend Capital Underspend: Variance Amount over $50M	PG&E did not spend $88.2M of the planned $154.98M, 57% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows:

																"Variance mainly driven by: - anticipated delays in the work scheduled due to permitting and access constraints for multiple Ignacio-Mare Island (230kV) tower replacements. - Underrun driven due to favorability vs original job estimate from successful contract negotiations on Lammers-Kasson (115kV) and SF Martin (115kV) Projects. - Project deferrals due to funding constraints"
7.3.3 Grid Design and System Hardening	7.3.3.16	Undergrounding of electric lines and/or equipment	523	$0	$0	$0		$611,250	$406,762	-$204,488	-33%	$611,250	$406,762	-$204,488	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount over $50M	PG&E did not spend $204.49M of the planned $611.25M, 33% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - timing variance of readiness budget for our 2023 UG portfolio of projects. The forecast for scoping, estimating/design, permitting, and pre-construction of 2023 projects (costs which would be incurred in 2022)

																did not materialize as initially forecasted."
7.3.3 Grid Design and System Hardening	7.3.3.17.1	Updates to grid topology to minimize risk of ignition in HFTDs, System Hardening, Distribution	537	$0	$0	$0		$977,250	$703,061	-$274,189	-28%	$977,250	$703,061	-$274,189	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount over $50M	PG&E did not spend $274.19M of the planned $977.25M, 28% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Covered conductor installation - favorable unit cost performance from reduction of pre-construction vegetation clearing and implementation of unit price RFP contract strategy - Undergrounding program - timing variance of readiness budget for our 2023 UG portfolio of projects. The forecast for scoping, estimating/design, permitting, and pre-construction of 2023 projects (costs which would be incurred in 2022) did not materialize as initially forecasted."
7.3.3 Grid Design and System Hardening	7.3.3.17.2	Updates to grid topology to minimize risk of ignition in HFTDs,	629	$0	$0	$0		$19,051	$7,856	-$11,195	-59%	$19,051	$7,856	-$11,195	No Expense amount was planned or spent for this WMP Initiative.	PG&E did not spend $11.2M of the planned $19.05M, 59% of the total Capital amount initially allocated for this initiative.

		System Hardening, Transmission													Capital Underspend: Variance Amount $10M - $20M	Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Actuals lower due to updated planned transmission system hardening projects to be completed in 2022; in addition forecast was reduced to exclude idle line removal costs which are disallowed for recovery. "
7.3.3 Grid Design and System Hardening	7.3.3.17.3	Updates to grid topology to minimize risk of ignition in HFTDs, Surge Arrestor	552	$0	$0	$0		$33,172	$37,368	$4,196	13%	$33,172	$37,368	$4,196	No Expense amount was planned or spent for this WMP Initiative. Capital Overspend	
7.3.3 Grid Design and System Hardening	7.3.3.17.4	Updates to grid topology to minimize risk of ignition in HFTDs, Rapid Earth Current Fault Limiter	599	$0	$819	$819		$0	$75	$75		$0	$894	$894	Expense Overspend Capital Overspend	
7.3.3 Grid Design and System Hardening	7.3.3.17.5	Updates to grid topology to minimize risk of ignition in HFTDs, Remote Grid	558	$14,824	$2,029	-$12,795	-86%	$17,000	$2,734	-$14,266	-84%	$31,824	$4,763	-$27,061	Expense Underspend: Variance Amount $10M - $20M Capital	PG&E did not spend $12.8M of the planned $14.82M, 86% of the total Expense amount initially allocated for this initiative. Per the Variance

															Underspend: Variance Amount $10M - $20M	Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - PG&E did not complete any Line Elimination Incentive Program (LEIP) projects. This was due to fewer than expected new opportunities for the LEIP and to opportunities pursued where PG&E could not reach mutual agreement to discontinue electric service." PG&E did not spend $14.27M of the planned $17M, 84% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - lower than forecasted number of remote grid capital projects completed"
7.3.3 Grid Design and System Hardening	7.3.3.17.6	Updates to grid topology to minimize risk of ignition in HFTDs,	648	$0	$0	$0		$138,750	$151,307	$12,557	9%	$138,750	$151,307	$12,557	No Expense amount was planned or spent for this WMP Initiative.	

		Butte County Rebuild													Capital Overspend	
7.3.3 Grid Design and System Hardening	7.3.3.2-D	Circuit breaker maintenance and installation to de-energize lines upon detecting a fault, Maintenance Substation Distribution	459	$2,586	$3,483	$897	35%	$0	$0	$0		$2,586	$3,483	$897	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.3 Grid Design and System Hardening	7.3.3.2-T	Circuit breaker maintenance and installation to de-energize lines upon detecting a fault, Maintenance Substation Transmission	459	$2,445	$2,225	-$219	-9%	$0	$0	$0		$2,445	$2,225	-$219	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $219.3K of the planned $2.44M, 9% of the total Expense amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.3	Covered conductor installation	462	$0	$0	$0		$366,000	$285,544	-$80,456	-22%	$366,000	$285,544	-$80,456	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount over $50M	PG&E did not spend $80.46M of the planned $366M, 22% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - favorable unit cost performance from reduction of pre-construction vegetation clearing and

																implementation of unit price RFP contract strategy"
7.3.3 Grid Design and System Hardening	7.3.3.4	Covered conductor maintenance	469	$9,013	$11,192	$2,179	24%	$44,386	$39,994	-$4,392	-10%	$53,400	$51,186	-$2,213	Expense Overspend Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $4.39M of the planned $44.39M, 10% of the total Capital amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.5	Crossarm maintenance, repair, and replacement	471	$2,567	$715	-$1,852	-72%	$71,788	$76,477	$4,689	7%	$74,355	$77,192	$2,837	Expense Underspend: Variance Amount $1M - $5M Capital Overspend	PG&E did not spend $1.85M of the planned $2.57M, 72% of the total Expense amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.6	Distribution pole replacement and reinforcement, including with composite poles	473	$3,460	$3,363	-$98	-3%	$419,170	$489,699	$70,529	17%	$422,630	$493,061	$70,431	Expense Underspend: Variance Amount $0M - $1M Capital Overspend	PG&E did not spend $97.5K of the planned $3.46M, 3% of the total Expense amount initially allocated for this initiative.
7.3.3 Grid Design and System Hardening	7.3.3.7	Expulsion fuse replacement	446	$0	$0	$0		$35,000	$23,064	-$11,936	-34%	$35,000	$23,064	-$11,936	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $10M - $20M	PG&E did not spend $11.94M of the planned $35M, 34% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by:

																- favorable unit cost performance"
7.3.3 Grid Design and System Hardening	7.3.3.8.1	Grid topology improvements to mitigate or reduce PSPS events, Distribution Line Sectionalizing	450	$0	$0	$0		$10,452	$13,217	$2,765	26%	$10,452	$13,217	$2,765	No Expense amount was planned or spent for this WMP Initiative. Capital Overspend	
7.3.3 Grid Design and System Hardening	7.3.3.8.2	Grid topology improvements to mitigate or reduce PSPS events, Transmission Line Sectionalizing	454	$0	$0	$0		$54,248	$28,807	-$25,441	-47%	$54,248	$28,807	-$25,441	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $20M - $50M	PG&E did not spend $25.44M of the planned $54.25M, 47% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - 2022 forecast showed cost for entire MAT code 94A which includes non-WMP related work; while 2022 Actuals are selecting specific SCADA projects that mitigate PSPS impacts"
7.3.3 Grid Design and System Hardening	7.3.3.8.3	Grid topology improvements to mitigate or reduce PSPS events, Distribution Line Motorized Switch Operator Pilot	457	$0	$0	$0		$10,452	$6,609	-$3,844	-37%	$10,452	$6,609	-$3,844	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance	PG&E did not spend $3.84M of the planned $10.45M, 37% of the total Capital amount initially allocated for this initiative.

															Amount $1M - $5M	
7.3.3 Grid Design and System Hardening	7.3.3.9.1	Installation of system automation equipment	462	$0	$0	$0		$15,599	$17,351	$1,752	11%	$15,599	$17,351	$1,752	No Expense amount was planned or spent for this WMP Initiative. Capital Overspend	
7.3.3 Grid Design and System Hardening	7.3.3.9.2	Installation of system automation equipment, Single phase reclosers	465	$0	$0	$0		$4,400	$10,597	$6,197	141%	$4,400	$10,597	$6,197	No Expense amount was planned or spent for this WMP Initiative. Capital Overspend	
7.3.4 Asset Management and Inspections	7.3.4.1	Detailed inspections of distribution electric lines and equipment	569	$100,379	$98,300	-$2,079	-2%	$0	$0	$0		$100,379	$98,300	-$2,079	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $2.08M of the planned $100.38M, 2% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.10	Other discretionary inspection of transmission electric lines and equipment, beyond inspections mandated by rules and regulations	650	$4,300	$0	-$4,300	-100%	$3,700	$1,123	-$2,577	-70%	$8,000	$1,123	-$6,877	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $4.3M of the planned $4.3M, 100% of the total Expense amount initially allocated for this initiative. PG&E did not spend $2.58M of the planned $3.7M, 70% of the total Capital amount initially allocated for this initiative.

7.3.4 Asset Management and Inspections	7.3.4.11	Patrol inspections of distribution electric lines and equipment	654	$6,063	$8,394	$2,331	38%	$0	$0	$0		$6,063	$8,394	$2,331	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.4 Asset Management and Inspections	7.3.4.12	Patrol inspections of transmission electric lines and equipment	657	$84	$49	-$34	-41%	$0	$0	$0		$84	$49	-$34	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $34.2K of the planned $0.08M, 41% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.13	Pole loading assessment program to determine safety factor	660	$9,123	$8,952	-$171	-2%	$0	$0	$0		$9,123	$8,952	-$171	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $170.6K of the planned $9.12M, 2% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.14	Quality assurance / quality control of inspections	619	$6,016	$6,415	$399	7%	$0	$0	$0		$6,016	$6,415	$399	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	

7.3.4 Asset Management and Inspections	7.3.4.15-D	Substation inspections, Enhanced Distribution, Substation	668	$4,397	$2,956	-$1,441	-33%	$0	$0	$0		$4,397	$2,956	-$1,441	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $1.44M of the planned $4.4M, 33% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.15-T	Substation inspections, Enhanced Transmission, Substation	668	$1,757	$1,740	-$17	-1%	$0	$0	$0		$1,757	$1,740	-$17	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $17.1K of the planned $1.76M, 1% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.16	Other, Substation inspections, Generation	628	$1,141	$1,036	-$105	-9%	$0	$0	$0		$1,141	$1,036	-$105	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $105.3K of the planned $1.14M, 9% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.2	Detailed inspections of transmission electric lines and equipment	574	$86,707	$68,327	-$18,380	-21%	$0	$0	$0		$86,707	$68,327	-$18,380	Expense Underspend: Variance Amount $10M - $20M No Capital	PG&E did not spend $18.38M of the planned $86.71M, 21% of the total Expense amount initially allocated for this initiative. Per the Variance

															amount was planned or spent for this WMP initiative.	Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Favorable unit cost - Aerial Inspection (BF2) desktop review contract updated with favorable rates."
7.3.4 Asset Management and Inspections	7.3.4.3	Improvement of inspections	623	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was planned or spent for this WMP initiative.	
7.3.4 Asset Management and Inspections	7.3.4.4	Infrared inspections of distribution electric lines and equipment	582	$2,226	$1,988	-$238	-11%	$0	$0	$0		$2,226	$1,988	-$238	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $238K of the planned $2.23M, 11% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.5	Infrared inspections of transmission electric lines and equipment	629	$2,220	$3,660	$1,440	65%	$0	$0	$0		$2,220	$3,660	$1,440	Expense Overspend No Capital amount was planned or	

															spent for this WMP initiative.	
7.3.4 Asset Management and Inspections	7.3.4.6.1	Intrusive pole inspections, Distribution	633	$21,239	$20,554	-$686	-3%	$0	$0	$0		$21,239	$20,554	-$686	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $685.8K of the planned $21.24M, 3% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.6.2	Intrusive pole inspections, Transmission	636	$2,150	$1,694	-$456	-21%	$0	$0	$0		$2,150	$1,694	-$456	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $455.8K of the planned $2.15M, 21% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.7	LiDAR Inspections of Distribution Electric Lines and Equipment	639	$10,500	$8,457	-$2,043	-19%	$0	$1,139	$1,139		$10,500	$9,596	-$904	Expense Underspend: Variance Amount $1M - $5M Capital Overspend	PG&E did not spend $2.04M of the planned $10.5M, 19% of the total Expense amount initially allocated for this initiative.
7.3.4 Asset Management and Inspections	7.3.4.8	LiDAR Inspections of Transmission Electric Lines and Equipment	643	$5,030	$3,742	-$1,288	-26%	$11,003	$4,720	-$6,283	-57%	$16,033	$8,462	-$7,571	Expense Underspend: Variance Amount $1M - $5M Capital Underspend:	PG&E did not spend $1.29M of the planned $5.03M, 26% of the total Expense amount initially allocated for this initiative. PG&E did not spend $6.28M of the planned

															Variance Amount $5M - $10M	$11M, 57% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.4.8_DR_BVNA_024_Q005_R001, PG&E explained the variance in the Expense and Capital Spending as Follows: "The reduction of dollars ($4,252M) spent against the original forecast ($11,003M) for initiative 7.3.4.8 was the result of shifting these funds to higher priority LiDAR-based work that would achieve increased wildfire risk reduction. Specifically, the non-HFTD scope of work that was originally included in this initiative was removed in order to prioritize HFTD LiDAR modeling work for electrical clearance evaluation. This prioritized work spent $6.751M in 2022 and continues into 2023 as described in 2023 WMP Section 8.1.3.1.8. Additionally, please note that there were no quantitative or qualitative

															targets set for this work in our 2022 WMP."
7.3.4 Asset Management and Inspections	7.3.4.9	Other discretionary inspection of distribution electric lines and equipment, beyond inspections mandated by rules and regulations	647	$3,258	$4,030	$772	24%	$0	$0	$0		$3,258	$4,030	$772	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.1	Additional efforts to manage community and environmental impacts	720	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.10	Other discretionary inspections of vegetation around transmission electric lines and equipment	762	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.11	Patrol inspections of vegetation around distribution electric lines and equipment	764	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was	

															planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.12	Patrol inspections of vegetation around transmission electric lines and equipment	766	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.13	Quality assurance / quality control of vegetation inspections	670	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.14	Recruiting and training of vegetation management personnel	779	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.15	Identification and remediation of "at-risk species"	784	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this	

															WMP Initiative. No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.16	Removal and remediation of trees with strike potential to electric lines and equipment	786	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.17.1	Substation inspection , Distribution substation	682	$553	$849	$296	54%	$0	$0	$0		$553	$849	$296	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.17.2	Substation inspection, Transmission substation	792	$233	$740	$507	218%	$0	$0	$0		$233	$740	$507	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.17.3	Substation inspection, Generation substation	831	$1,766	$1,807	$41	2%	$0	$0	$0		$1,766	$1,807	$41	Expense Overspend No Capital amount was planned or	

															spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.18.1	Substation vegetation management, Maintenance substation distribution	797	$1,266	$2,458	$1,193	94%	$0	$0	$0		$1,266	$2,458	$1,193	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.18.2	Substation vegetation management, Maintenance substation transmission	799	$1,253	$864	-$389	-31%	$0	$0	$0		$1,253	$864	-$389	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $389.1K of the planned $1.25M, 31% of the total Expense amount initially allocated for this initiative.
7.3.5 Vegetation Management and Inspections	7.3.5.18.3	Substation vegetation management, Maintenance substation Generation	801	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.19	Vegetation management system	803	$92,516	$21,379	-$71,137	-77%	$0	$0	$0		$92,516	$21,379	-$71,137	Expense Underspend: Variance Amount over $50M No Capital amount was	PG&E did not spend $71.14M of the planned $92.52M, 77% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in

															planned or spent for this WMP initiative.	PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "VM team provide update on 3/29 pm: - ~$75M of the forecast was earmarked to help with a transition away from EVM at the beginning of 2022. This was intended to revisit procedures, update trainings and work on lessons learned. However, the EVM program continued on through 2022, so these money was reallocated back to the EVM program."
7.3.5 Vegetation Management and Inspections	7.3.5.2	Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment	634	########	#######	-$32,630	-2%	$0	$0	$0		$1,370,788	$1,338,159	-$32,630	Expense Underspend: Variance Amount $20M - $50M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $32.63M of the planned $1370.79M, 2% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.5.2_DR_BVNA_024_Q007_R001, PG&E explained the variance in the Expense Spending as Follows: "The primary driver of the expense underspend was due to reduced unit costs in the EVM program, partially offset by higher costs in the Routine Program:

																EVM: The spend was less than the forecast, which is attributable to both a lower volume and complexity of tree work and our ability to successfully work trees at a lower average unit cost, than predicted in the initial forecast model. Routine Distribution: the spend was greater than forecast due to 2021 under accrual (costs associated with the prior year's costs that were not included in that year's costs, ~$20M), schedule acceleration costs (~$18M), and higher average unit costs, partly offset by reduced volume of completed units. Tree Mortality (First Patrol): The spend was less than forecast, which was primarily driven by the cessation of recording incremental costs for completed Dead & Dying units identified on Routine patrols (first patrol). The Tree Mortality program was originally targeted to address the impact of increased volumes of dead and dying trees and was funded separately through the CEMA recovery mechanism. Under this mechanism the

																incremental costs of these first patrol units were creditable to the Tree Mortality Program. In 2022, the Tree Mortality program funding is consistent with the other vegetation management programs (i.e., the GRC rate case) and consequently costs for these units were not transferred to the Tree Mortality program. The 2022 Tree Mortality plan for costs and units did not anticipate this change and was not adjusted to remove these anticipated costs and units."
7.3.5 Vegetation Management and Inspections	7.3.5.20	Additional vegetation management practices beyond regulatory requirements and recommendations	699	$32,354	$28,914	-$3,440	-11%	$0	$0	$0		$32,354	$28,914	-$3,440	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $3.44M of the planned $32.35M, 11% of the total Expense amount initially allocated for this initiative.
7.3.5 Vegetation Management and Inspections	7.3.5.21	Vegetation management activities post-fire	809	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was planned or	

															spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.3	Detailed inspections and management practices for vegetation clearances around transmission electrical lines and equipment	729	$111,609	$118,608	$6,999	6%	$78,701	$35,364	-$43,337	-55%	$190,310	$153,972	-$36,338	Expense Overspend Capital Underspend: Variance Amount $20M - $50M	PG&E did not spend $43.34M of the planned $78.7M, 55% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Due to budget/financial constraints, some Right-of-Way work was deferred to 2023"
7.3.5 Vegetation Management and Inspections	7.3.5.4	Emergency response vegetation management due to red flag warning or other urgent climate conditions	734	$3,127	$3,127	$0	0%	$0	$0	$0		$3,127	$3,127	$0	Expense No Variance No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.5	Fuel management (including all wood management) and reduction of “slash” from vegetation management activities	736	$92,610	$160,447	$67,837	73%	$0	$0	$0		$92,610	$160,447	$67,837	Expense Overspend No Capital amount was planned or spent for this WMP initiative.	
7.3.5 Vegetation Management and Inspections	7.3.5.6	Improvement of inspections	739	$143,138	$68,800	-$74,339	-52%	$0	$0	$0		$143,138	$68,800	-$74,339	Expense Underspend: Variance Amount over $50M	PG&E did not spend $74.34M of the planned $143.14M, 52% of the total Expense amount initially allocated for this initiative.

															No Capital amount was planned or spent for this WMP initiative.	Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Due to change in QC commitment, funding was reprioritized for higher risk work. Team finished 2021 commitment in 2022 ('21 VM Tree work was completed in the following year), did QC sampling, field quality assessments and quality assurance work. - Staffing levels for both internal and external work verifications were lower than forecasted combined with contractor conversions and efficiencies leading to reduced spend."
7.3.5 Vegetation Management and Inspections	7.3.5.7	Remote sensing inspections of vegetation around distribution electric lines and equipment	655	$37,090	$3,641	-$33,449	-90%	$0	$0	$0		$37,090	$3,641	-$33,449	Expense Underspend: Variance Amount $20M - $50M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $33.45M of the planned $37.09M, 90% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by:

																- Significant reduction in Ground based LiDAR scope due to the WMP commitment of 2k miles vs. potential opportunity to collect ~49% of HFTD spans. Re-flight/ aerial collection of data was de-scoped. WMP forecasted spend followed a 6AOI allocation based on an anticipate level of programmatic support."
7.3.5 Vegetation Management and Inspections	7.3.5.8	Remote sensing inspections of vegetation around transmission electric lines and equipment	658	$13,000	$7,770	-$5,230	-40%	$0	$0	$0		$13,000	$7,770	-$5,230	Expense Underspend: Variance Amount $5M - $10M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $5.23M of the planned $13M, 40% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.5.8_DR_BVNA_024_Q003_R001, PG&E explained the variance in the Expense Spending as Follows: "- The 2022 target spend of $13M included $10.5M for primary LiDAR contract and $2.5M for hyperspectral data collection work. - A budgeting error was made due to the seasonal nature of the work since it does not precisely correspond with a specific

																calendar year. The primary LiDAR contract of $10.5M started in August 2021 and ended in November 2022. Approximately $5.5M of the spend was in 2021 and $5M was in 2022. The 2023 LiDAR contract started in December 2022 with $2.8M of related spend in 202. Therefore in 2022, the total spend was approximately $7.8M (approximately $5M for the 2022 contract and approximately $2.8M for the 2023 contract). Thus, the spending for the 2021-2022 work season totaled $10.5M, while the total spending for the 2022 calendar year totaled $7.8M. - In 2022, we removed the $2.5M hyperspectral data collection work form our 2022 contract. This data collection identifies tree species to further support targeted vegetation management. We reduced this scope of work because we determined it was more efficient use of resources to use historical data instead of the hyperspectral data. The reduction in scope did not impact our primary routine compliance detections."

7.3.5 Vegetation Management and Inspections	7.3.5.9	Other discretionary inspections of vegetation around distribution electric lines and equipment	760	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was planned or spent for this WMP initiative.	
7.3.6 Grid Operations and Protocols	7.3.6.1	Automatic recloser operations	812	$0	$0	$0		$0	$0	$0		$0	$0	$0	No Expense amount was planned or spent for this WMP Initiative. No Capital amount was planned or spent for this WMP initiative.	
7.3.6 Grid Operations and Protocols	7.3.6.2	Crew-accompanying ignition prevention and suppression resources and services	814	$14,524	$11,871	-$2,653	-18%	$690	$26	-$664	-96%	$15,214	$11,897	-$3,317	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $2.65M of the planned $14.52M, 18% of the total Expense amount initially allocated for this initiative. PG&E did not spend $664.3K of the planned $0.69M, 96% of the total Capital amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.3	Personnel work procedures and training in conditions of elevated fire risk	817	$1,000	$808	-$192	-19%	$0	$0	$0		$1,000	$808	-$192	Expense Underspend: Variance Amount $0M - $1M No Capital	PG&E did not spend $191.6K of the planned $1M, 19% of the total Expense amount initially allocated for this initiative.

															amount was planned or spent for this WMP initiative.	
7.3.6 Grid Operations and Protocols	7.3.6.4-D	Protocols for PSPS re-energization, Distribution	820	$10,093	$9,272	-$821	-8%	$4,940	$1,294	-$3,646	-74%	$15,034	$10,567	-$4,467	Expense Underspend: Variance Amount $0M - $1M Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $820.8K of the planned $10.09M, 8% of the total Expense amount initially allocated for this initiative. PG&E did not spend $3.65M of the planned $4.94M, 74% of the total Capital amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.4-T	Protocols for PSPS re-energization, Transmission	820	$2,000	$440	-$1,560	-78%	$0	$0	$0		$2,000	$440	-$1,560	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $1.56M of the planned $2M, 78% of the total Expense amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.5-D	PSPS events and mitigation of PSPS impacts , Distribution	825	$68,814	$3	-$68,812	-100%	$0	$0	$0		$68,814	$3	-$68,812	Expense Underspend: Variance Amount over $50M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $68.81M of the planned $68.81M, 100% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - PSPS events did not

																happen as weather conditions was more favorable in 2022"
7.3.6 Grid Operations and Protocols	7.3.6.5-T	PSPS events and mitigation of PSPS impacts , Transmission	825	$1,808	$8	-$1,800	-100%	$0	$0	$0		$1,808	$8	-$1,800	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $1.8M of the planned $1.81M, 100% of the total Expense amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.6	Stationed and on-call ignition prevention and suppression resources and services	828	$4,841	$791	-$4,050	-84%	$230	$2	-$228	-99%	$5,071	$793	-$4,278	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $4.05M of the planned $4.84M, 84% of the total Expense amount initially allocated for this initiative. PG&E did not spend $228.3K of the planned $0.23M, 99% of the total Capital amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.7	Other, Aviation Support	831	$6,142	$2,569	-$3,573	-58%	$325	-$37	-$362	-111%	$6,467	$2,533	-$3,934	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $3.57M of the planned $6.14M, 58% of the total Expense amount initially allocated for this initiative. PG&E did not spend $361.5K of the planned $0.33M, 111% of the total Capital amount initially allocated for this initiative.
7.3.6 Grid Operations and Protocols	7.3.6.8	Protective equipment and device settings	730	$142,592	$82,889	-$59,703	-42%	$0	$17,975	$17,975		$142,592	$100,864	-$41,728	Expense Underspend: Variance Amount over	PG&E did not spend $59.7M of the planned $142.59M, 42% of the total Expense amount initially

															$50M Capital Overspend	allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - EPSS Patrol lower than planned primarily due to improvements/efficiencies made by the EPSS program (e.g., daily EPSS enablement/disablement based on wildfire risk and installing fault indicators to narrow down circuit area for outage patrol)"
7.3.7 Data Governance	7.3.7.1	Centralized repository for data	740	$858	$858	$0	0%	$0	$0	$0		$858	$858	$0	Expense No Variance No Capital amount was planned or spent for this WMP initiative.	
7.3.7 Data Governance	7.3.7.2	Collaborative research on utility ignition and/or wildfire	880	$866	$296	-$570	-66%	$0	$0	$0		$866	$296	-$570	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $570.3K of the planned $0.87M, 66% of the total Expense amount initially allocated for this initiative.
7.3.7 Data Governance	7.3.7.3	Documentation and disclosure of	884	$1,047	$1,047	$0	0%	$0	$0	$0		$1,047	$1,047	$0	Expense No Variance	

		wildfire-related data and algorithms													No Capital amount was planned or spent for this WMP initiative.	
7.3.7 Data Governance	7.3.7.4	Tracking and analysis of near miss data	893	$651	$651	$0	0%	$0	$0	$0		$651	$651	$0	Expense No Variance No Capital amount was planned or spent for this WMP initiative.	
7.3.7 Data Governance	7.3.7.5	Other, IT projects to support wildfire mitigation work	897	$45,100	$44,060	-$1,040	-2%	$49,300	$52,496	$3,196	6%	$94,400	$96,556	$2,156	Expense Underspend: Variance Amount $1M - $5M Capital Overspend	PG&E did not spend $1.04M of the planned $45.1M, 2% of the total Expense amount initially allocated for this initiative.
7.3.8 Resource Allocation Methodology	7.3.8.1	Allocation methodology development and application	905	$3,486	$1,262	-$2,223	-64%	$4,382	$4,702	$319	7%	$7,868	$5,964	-$1,904	Expense Underspend: Variance Amount $1M - $5M Capital Overspend	PG&E did not spend $2.22M of the planned $3.49M, 64% of the total Expense amount initially allocated for this initiative.
7.3.8 Resource Allocation Methodology	7.3.8.2	Risk reduction scenario development and analysis	909	$62	$62	$0	0%	$910	$511	-$399	-44%	$972	$573	-$399	Expense No Variance Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $399.3K of the planned $0.91M, 44% of the total Capital amount initially allocated for this initiative.

7.3.8 Resource Allocation Methodology	7.3.8.3	Risk spend efficiency analysis (RSE)	783	$934	$934	$0	0%	$0	$0	$0		$934	$934	$0	Expense No Variance No Capital amount was planned or spent for this WMP initiative.	
7.3.9 Emergency Planning & Preparedness	7.3.9.1	Adequate and trained workforce for service restoration	915	$7,666	$7,277	-$389	-5%	$0	$0	$0		$7,666	$7,277	-$389	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $388.6K of the planned $7.67M, 5% of the total Expense amount initially allocated for this initiative.
7.3.9 Emergency Planning & Preparedness	7.3.9.2	Community outreach, public awareness, and communications efforts	919	$21,739	$17,157	-$4,582	-21%	$0	$0	$0		$21,739	$17,157	-$4,582	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $4.58M of the planned $21.74M, 21% of the total Expense amount initially allocated for this initiative.
7.3.9 Emergency Planning & Preparedness	7.3.9.3	Customer support in emergencies	924	$3,413	$2,288	-$1,126	-33%	$0	$0	$0		$3,413	$2,288	-$1,126	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or	PG&E did not spend $1.13M of the planned $3.41M, 33% of the total Expense amount initially allocated for this initiative.

															spent for this WMP initiative.	
7.3.9 Emergency Planning & Preparedness	7.3.9.4	Disaster and emergency preparedness plan	931	$6,843	$4,712	-$2,131	-31%	$0	$0	$0		$6,843	$4,712	-$2,131	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $2.13M of the planned $6.84M, 31% of the total Expense amount initially allocated for this initiative.
7.3.9 Emergency Planning & Preparedness	7.3.9.5	Preparedness and planning for service restoration	934	$15,794	$10,351	-$5,443	-34%	$0	$0	$0		$15,794	$10,351	-$5,443	Expense Underspend: Variance Amount $5M - $10M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $5.44M of the planned $15.79M, 34% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.9.5_DR_BVNA_024_Q002_R001, PG&E explained the variance in the Expense Spending as Follows: "Sixty-five helicopters were budgeted as part of the exclusive use contract that was scheduled to support Public Safety Power Shutoff (PSPS). however, as there were no PSPS events in 2022, the flight hours ended up fewer than planned which caused the underspend. please note

																that there were not quantitative or qualitative targets set for this work in our 2022 WMP."
7.3.9 Emergency Planning & Preparedness	7.3.9.6	Protocols in place to learn from wildfire events	938	$1,236	$1,236	$0	0%	$0	$0	$0		$1,236	$1,236	$0	Expense No Variance No Capital amount was planned or spent for this WMP initiative.	

Appendix F – Conclusion Table

SOW Category	2022 Initiative Number	Initiative Name	Finding	Detail on Finding
Verification of Funding	7.3.1.1	A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment	Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $399.3K of the planned $0.91M, 44% of the total Capital amount initially allocated for this initiative.
Verification of Funding	7.3.1.3	Ignition probability mapping showing the probability of ignition along the electric lines and equipment	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $399.3K of the planned $0.91M, 44% of the total Capital amount initially allocated for this initiative.
Verification of QA/QC Programs	7.3.1.3 - A.01	Distribution Modeling Enhancements - Equipment Failure and Contact From Object	Activity Validated	Compliant with the 2022 WMP, per Data Request

WMP Activity Verification	7.3.1.3 - A.01	Distribution Modeling Enhancements - Equipment Failure and Contact From Object	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.1.3 - A.02	Transmission Modeling Enhancements - Threat and Hazard Risk Drivers	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.1.3 - A.02	Transmission Modeling Enhancements - Threat and Hazard Risk Drivers	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.1.4 - A.03	PSPS Consequence Model	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.1.4 - A.03	PSPS Consequence Model	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.1.5	Match drop simulations showing the potential wildfire consequence of ignitions that occur along the electric	Expense Underspend: Variance Amount $0M - $1M Capital Underspend:	PG&E did not spend $10.9K of the planned $3.2M, 0% of the total Expense amount initially allocated for this initiative. PG&E did not spend $23.9K of the planned $1.19M, 2% of the total Capital amount initially allocated for this initiative.

		lines and equipment	Variance Amount $0M - $1M	
Verification of QA/QC Programs	7.3.1.5 - A.04	Wildfire Consequence Model Enhancements - Ingress/Egress	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.1.5 - A.04	Wildfire Consequence Model Enhancements - Ingress/Egress	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.1.5 - A.05	Wildfire Consequence Model Enhancements - Resistance to Control	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.1.5 - A.05	Wildfire Consequence Model Enhancements - Resistance to Control	Activity Validated	Compliant with the 2022 WMP, per Data Request

Verification of Funding	7.3.10.1	Community engagement	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $4.27M of the planned $20.62M, 21% of the total Expense amount initially allocated for this initiative.
Verification of QA/QC Programs	7.3.10.1 - J.01	Community Engagement - Meetings	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.10.1 - J.01	Community Engagement - Meetings	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.10.2	Cooperation and best practice sharing with agencies outside CA	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this	PG&E did not spend $13.6K of the planned $0.19M, 7% of the total Expense amount initially allocated for this initiative.

			WMP initiative.	
Verification of Funding	7.3.10.4	Forest service and fuel reduction cooperation and joint roadmap	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $2.03M of the planned $5.13M, 40% of the total Expense amount initially allocated for this initiative.
Verification of QA/QC Programs	7.3.2.1.1 - B.01	FPI and IPW Modeling - Revision Evaluation	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.2.1.1 - B.01	FPI and IPW Modeling - Revision Evaluation	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.2.1.2	Advanced weather monitoring and weather stations, Fuel Moisture Sampling and Modeling	Expense Underspend: Variance Amount $0M - $1M No Capital amount was	PG&E did not spend $46.3K of the planned $0.6M, 8% of the total Expense amount initially allocated for this initiative.

			planned or spent for this WMP initiative.	
Verification of Funding	7.3.2.1.3	Advanced weather monitoring and weather stations, Weather Stations	Expense Overspend Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $556.3K of the planned $6.18M, 9% of the total Capital amount initially allocated for this initiative.
Verification of QA/QC Programs	7.3.2.1.3 - B.02	Weather Stations - Installations and Optimizations	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.2.1.3 - B.02	Weather Stations - Installations and Optimizations	Activity Field Verified. 20 Field Samples/ 111 Data Output Reviews	Goal met/ exceeded 6/111 or (5.4%) Potentially non-operational at time of review
Verification of QA/QC Programs	7.3.2.1.4 - B.03	High-Definition Cameras - Installations	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.2.1.4 - B.03	High-Definition Cameras - Installations	Activity Field Verified. 100 Data Output Reviews	Goal met/ exceeded 1/100 or (1%) Potentially non-operational at time of review

Verification of Funding	7.3.2.1.5	Advanced weather monitoring and weather stations, Fire Detection & Alerting	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $28.9K of the planned $0.34M, 8% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.2.1.6	Advanced weather monitoring and weather stations, Other Meteorology Tools and Upgrades	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $619.7K of the planned $1.02M, 61% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.2.2.3	Continuous monitoring sensors, Distribution Fault Anticipation Technology and	Expense Underspend: Variance Amount $1M - $5M Capital	PG&E did not spend $2.31M of the planned $2.57M, 90% of the total Expense amount initially allocated for this initiative. PG&E did not spend $4.64M of the planned $14.58M, 32% of the total Capital amount initially allocated for this initiative.

		Early Fault Detection	Underspend: Variance Amount $1M - $5M	
Verification of QA/QC Programs	7.3.2.2.3 - B.04	Distribution Fault Anticipation (DFA) - Installations	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.2.2.3 - B.04	Distribution Fault Anticipation (DFA) - Installations	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.2.2.3 - B.05	Early Fault Detection (EFD) - Installations	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.2.2.3 - B.05	Early Fault Detection (EFD) - Installations	Activity Validated	Compliant with the 2022 WMP, per Data Request

Verification of Funding	7.3.2.2.5	Continuous monitoring sensors, Line Sensor Devices	Expense Overspend Capital Underspend: Variance Amount $5M - $10M	PG&E did not spend $5.52M of the planned $7.81M, 71% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.2.2.5_DR_BVNA_024_Q006_R0011, PG&E explained the variance in the Capital Spending as Follows: "The underspend can be attributed to: 1. deferred IT Infrastructure upgrade costs, which were caused by delayed standards approval for line sensor product; and 2. efficiencies from lower installation costs due to optimized routing through concentrating the work in specific geographical divisions. Please note that this IT infrastructure upgrade work was only deferred, not canceled, and we are currently scheduling when this work will be performed." Additionally, PG&E indicated in the DR11935 response that the Capital spend was $2,407 for the effort against the target spend which is greater than the reported $2,291 from PG&E"s 2022 ARC Report.
Verification of QA/QC Programs	7.3.2.2.5 - B.06	Line Sensor - Installations	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.2.2.5 - B.06	Line Sensor - Installations	Activity Validated	Compliant with the 2022 WMP, per Data Request

Verification of Funding	7.3.2.2.7	Continuous monitoring sensors, DTS FAST	Expense Underspend: Variance Amount $0M - $1M Capital Underspend: Variance Amount $10M - $20M	PG&E did not spend $4K of the planned $0.6M, 1% of the total Expense amount initially allocated for this initiative. PG&E did not spend $16.49M of the planned $19.45M, 85% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Decreased program forecast due to budgetary reduction. Program paused transmission efforts in late 2021. In 2022, the program did not receive the required funding necessary to continue efforts to deploy DTS-FAST. In the interim, the program is looking to make the system more scalable and cost effective to deploy."
Verification of Funding	7.3.2.4	Forecast of a fire risk index, fire potential index, or similar	Expense Underspend: Variance Amount $0M - $1M Capital Overspend	PG&E did not spend $344.6K of the planned $1.87M, 18% of the total Expense amount initially allocated for this initiative.

Verification of Funding	7.3.2.5	Personnel monitoring areas of electric lines and equipment in elevated fire risk conditions	Expense Underspend: Variance Amount $0M - $1M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $884.4K of the planned $4.84M, 18% of the total Expense amount initially allocated for this initiative. PG&E did not spend $221.4K of the planned $0.23M, 96% of the total Capital amount initially allocated for this initiative.
Verification of Funding	7.3.2.6	Weather forecasting and estimating impacts on electric lines and equipment	Expense Underspend: Variance Amount $0M - $1M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $361.8K of the planned $1.11M, 33% of the total Expense amount initially allocated for this initiative. PG&E did not spend $294.1K of the planned $1.02M, 29% of the total Capital amount initially allocated for this initiative.
Verification of Funding	7.3.2.7	Other, Wildfire Safety Operations Center (WSOC)	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance	PG&E did not spend $2.71M of the planned $6.98M, 39% of the total Expense amount initially allocated for this initiative. PG&E did not spend $101.4K of the planned $0.12M, 81% of the total Capital amount initially allocated for this initiative.

			Amount $0M - $1M	
Verification of Funding	7.3.3.10	Maintenance, repair, and replacement of connectors, including hotline clamps	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $4.35M of the planned $14.6M, 30% of the total Expense amount initially allocated for this initiative. PG&E did not spend $728.7K of the planned $3.13M, 23% of the total Capital amount initially allocated for this initiative.
Verification of Funding	7.3.3.11.1	Mitigation of impact on customers and other residents affected during PSPS event, Generation for PSPS Mitigation	Expense Underspend: Variance Amount over $50M Capital Underspend: Variance Amount $10M - $20M	PG&E did not spend $72.1M of the planned $112.69M, 64% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: 1) Temporary generation rental cost - lower due to 2021 over-accrual adjustment ($19M) and overall rental quantity (# of MWs) 2) Reduced operating costs incurred driven by minimal PSPS activity" PG&E did not spend $11.96M of the planned $23.32M, 51% of the total Capital amount

				initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Lower spend on CMEP capital projects due to long lead time for capital projects identification and development - Distribution Microgrids PIH: Actual costs lower due to much of work completed prior to 2022, also updated workplan for 4 locations, 3 improvement projects."
Verification of QA/QC Programs	7.3.3.11.1 - C.07	Temporary Distribution Microgrids	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.11.1 - C.07	Temporary Distribution Microgrids	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.3.11.2 - C.08	Rincon Transformer Fuse - Replacement	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.11.2 - C.08	Rincon Transformer Fuse - Replacement	Activity Validated	Compliant with the 2022 WMP, per Data Request

Verification of Funding	7.3.3.11.3	Mitigation of impact on customers and other residents affected during PSPS event, Emergency Back-up Generation – PG&E Service Centers & Materials Distribution Centers	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $1.33M of the planned $18M, 7% of the total Capital amount initially allocated for this initiative.
Verification of QA/QC Programs	7.3.3.11.3 - C.09	Emergency Back-up Generation – Equip PG&E Service Centers & Materials Distribution Centers	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.11.3 - C.09	Emergency Back-up Generation – Equip PG&E Service Centers & Materials Distribution Centers	Activity Validated	Compliant with the 2022 WMP, per Data Request

Verification of Funding	7.3.3.11.4	Fixed Power Solutions	Expense Underspend: Variance Amount $5M - $10M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $5.7M of the planned $7.8M, 73% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.3.11.4_DR_BVNA_024_Q001_R001, PG&E explained the variance in the Expense Spending as Follows: "The decrease from the forecast to the actual spend was due to the following factors: 1. the time required to design the programs causing the programs to start later in 2022; 2. the time required to execute the necessary third party contracts causing the program to start later in 2022; 3. delays resulting from global supply chain constraints on materials; and 4. weather-related delays on installation. However, please note that both programs are multi-year efforts and will continue in 2023 and beyond, meaning that although this money was not spent in 2022 it will be spent in future years as we continue to the roll-out of these programs."
Verification of Funding	7.3.3.12.1	Other corrective action, Distribution Substation	Expense Underspend: Variance Amount $0M - $1M	PG&E did not spend $140.3K of the planned $0.98M, 14% of the total Expense amount initially allocated for this initiative.

			No Capital amount was planned or spent for this WMP initiative.	
Verification of Funding	7.3.3.12.3	Other corrective action, Maintenance, Transmission	Expense Underspend: Variance Amount $20M - $50M Capital Overspend	PG&E did not spend $37.33M of the planned $127.98M, 29% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - reclassification of Bay Towers costs to capital - Lower volume of work for wooden structure (MAT ICW) compared to plan; also unit cost was favorable due to efficiency/savings "
Verification of Funding	7.3.3.12.4	Other corrective action, Maintenance, Distribution	Expense Underspend: Variance Amount $10M - $20M Capital Overspend	PG&E did not spend $11.19M of the planned $93.7M, 12% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.3.12.4_DR_BVNA_024_Q004_R001, PG&E explained the variance in the Expense Spending as Follows: "The majority of the

				underspend was the result of an inadvertent budgeting error. The budget for this initiative did not reflect all of the assumptions necessary because there was a missing line item in the Distribution Maintenance program of approximately $22M, which was not reflected in the initial budgeted amount for this initiative, due to inconsistencies in the master data. The Budget forecasted completing 26.121k units, with a targeted budget unit cost of $2.3k per unit (totaling approximately $59.M). However, the actual units completed were 19.353k, with an actual unit cost of $2.8k per unit (totaling approximately $53.2M). Additionally, there was a higher find rate of B tags in the non-HFTD areas of our territory, which impacted the execution of work in the HFTD areas. Please note that there were no quantitative or qualitative targets set for this work in our 2022 WMP."
Verification of Funding	7.3.3.13	Pole loading infrastructure hardening and replacement program based on pole loading assessment program	Expense Underspend: Variance Amount $0M - $1M Capital Overspend	PG&E did not spend $154.5K of the planned $0.15M, 100% of the total Expense amount initially allocated for this initiative.

Verification of Funding	7.3.3.14	Transformers maintenance and replacement	Expense Underspend: Variance Amount $0M - $1M Capital Overspend	PG&E did not spend $673.8K of the planned $1.34M, 50% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.3.15	Transmission tower maintenance and replacement	Expense Overspend Capital Underspend: Variance Amount over $50M	PG&E did not spend $88.2M of the planned $154.98M, 57% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - anticipated delays in the work scheduled due to permitting and access constraints for multiple Ignacio-Mare Island (230kV) tower replacements. - Underrun driven due to favorability vs original job estimate from successful contract negotiations on Lammers-Kasson (115kV) and SF Martin (115kV) Projects. - Project deferrals due to funding constraints"

Verification of Funding	7.3.3.16	Undergrounding of electric lines and/or equipment	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount over $50M	PG&E did not spend $204.49M of the planned $611.25M, 33% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - timing variance of readiness budget for our 2023 UG portfolio of projects. The forecast for scoping, estimating/design, permitting, and pre-construction of 2023 projects (costs which would be incurred in 2022) did not materialize as initially forecasted."
Verification of QA/QC Programs	7.3.3.16 - C.10	10K Undergrounding	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.16 - C.10	10K Undergrounding	Activity Field Verified. 34.17 Field Samples	Goal met/ exceeded (Undergrounding)

Verification of Funding	7.3.3.17.1	Updates to grid topology to minimize risk of ignition in HFTDs, System Hardening, Distribution	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount over $50M	PG&E did not spend $274.19M of the planned $977.25M, 28% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Covered conductor installation - favorable unit cost performance from reduction of pre-construction vegetation clearing and implementation of unit price RFP contract strategy - Undergrounding program - timing variance of readiness budget for our 2023 UG portfolio of projects. The forecast for scoping, estimating/design, permitting, and pre-construction of 2023 projects (costs which would be incurred in 2022) did not materialize as initially forecasted."
Verification of QA/QC Programs	7.3.3.17.1 - C.11	System Hardening - Distribution	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.17.1 - C.11	System Hardening - Distribution	Activity Field Verified. 51.26 Field Samples	Goal met/ exceeded

Verification of Funding	7.3.3.17.2	Updates to grid topology to minimize risk of ignition in HFTDs, System Hardening, Transmission	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $10M - $20M	PG&E did not spend $11.2M of the planned $19.05M, 59% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Actuals lower due to updated planned transmission system hardening projects to be completed in 2022; in addition forecast was reduced to exclude idle line removal costs which are disallowed for recovery. "
Verification of QA/QC Programs	7.3.3.17.2 - C.12	System Hardening - Transmission	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.17.2 - C.12	System Hardening - Transmission	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.3.17.3 - C.13	Surge Arrestor - Removals	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.17.3 - C.13	Surge Arrester - Removals	Activity Field Verified. 200 Field Samples	Goal met (Removals) Cannot confirm exceeded amount of 31 units per the 1% sampling discrepancy. 3 structures were found 134 to 200-ft from provided coordinates.

Verification of Funding	7.3.3.17.5	Updates to grid topology to minimize risk of ignition in HFTDs, Remote Grid	Expense Underspend: Variance Amount $10M - $20M Capital Underspend: Variance Amount $10M - $20M	PG&E did not spend $12.8M of the planned $14.82M, 86% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - PG&E did not complete any Line Elimination Incentive Program (LEIP) projects. This was due to fewer than expected new opportunities for the LEIP and to opportunities pursued where PG&E could not reach mutual agreement to discontinue electric service." PG&E did not spend $14.27M of the planned $17M, 84% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - lower than forecasted number of remote grid capital projects completed"
Verification of QA/QC Programs	7.3.3.17.5 - C.14	Remote Grid - Operate New SPS Units	Activity Validated	Compliant with the 2022 WMP, per Data Request

WMP Activity Verification	7.3.3.17.5 - C.14	Remote Grid - Operate New SPS Units	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.3.17.6 - C.15	Butte County Rebuild - Undergrounding	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.17.6 - C.15	Butte County Rebuild - Undergrounding	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.3.2-T	Circuit breaker maintenance and installation to de-energize lines upon detecting a fault, Maintenance Substation Transmission	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $219.3K of the planned $2.44M, 9% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.3.3	Covered conductor installation	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance	PG&E did not spend $80.46M of the planned $366M, 22% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - favorable unit cost performance from reduction of pre-construction vegetation

			Amount over $50M	clearing and implementation of unit price RFP contract strategy"
Verification of Funding	7.3.3.4	Covered conductor maintenance	Expense Overspend Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $4.39M of the planned $44.39M, 10% of the total Capital amount initially allocated for this initiative.
Verification of Funding	7.3.3.5	Crossarm maintenance, repair, and replacement	Expense Underspend: Variance Amount $1M - $5M Capital Overspend	PG&E did not spend $1.85M of the planned $2.57M, 72% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.3.6	Distribution pole replacement and reinforcement, including with composite poles	Expense Underspend: Variance Amount $0M - $1M Capital Overspend	PG&E did not spend $97.5K of the planned $3.46M, 3% of the total Expense amount initially allocated for this initiative.

Verification of Funding	7.3.3.7	Expulsion fuse replacement	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $10M - $20M	PG&E did not spend $11.94M of the planned $35M, 34% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - favorable unit cost performance"
Verification of QA/QC Programs	7.3.3.7 - C.01	Expulsion Fuse - Removal	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.7 - C.01	Expulsion Fuse - Removal	Activity Field Verified. 201 Field Samples	Goal met/ exceeded (Removals) 1 removal was found 400-feet from provided coordinates.
Verification of QA/QC Programs	7.3.3.8.1 - C.02	Distribution Sectionalizing Devices - Install and SCADA commission	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.8.1 - C.02	Distribution Sectionalizing Devices - Install and SCADA commission	Activity Field Verified. 25 Field Samples	Goal met/ exceeded (Installations) 2 installations were found 165 to 175-feet from provided coordinates.

Verification of Funding	7.3.3.8.2	Grid topology improvements to mitigate or reduce PSPS events, Transmission Line Sectionalizing	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance Amount $20M - $50M	PG&E did not spend $25.44M of the planned $54.25M, 47% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - 2022 forecast showed cost for entire MAT code 94A which includes non-WMP related work; while 2022 Actuals are selecting specific SCADA projects that mitigate PSPS impacts"
Verification of QA/QC Programs	7.3.3.8.2 - C.03	Transmission Line Sectionalizing - Install and SCADA commission	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.8.2 - C.03	Transmission Line Sectionalizing - Install and SCADA commission	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.3.8.3	Grid topology improvements to mitigate or reduce PSPS events, Distribution Line Motorized Switch Operator Pilot	No Expense amount was planned or spent for this WMP Initiative. Capital Underspend: Variance	PG&E did not spend $3.84M of the planned $10.45M, 37% of the total Capital amount initially allocated for this initiative.

			Amount $1M - $5M	
Verification of QA/QC Programs	7.3.3.8.3 - C.04	Distribution Line Motorized Switch Operator (MSO) - Replacements	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.8.3 - C.04	Distribution Line Motorized Switch Operator (MSO) - Replacements	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.3.9.1 - C.05	SCADA Recloser Equipment - Installations	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.9.1 - C.05	SCADA Recloser Equipment - Installations	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.3.9.2 - C.06	Fuse Savers (Single Phase Reclosers) - Installations	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.3.9.2 - C.06	Fuse Savers (Single Phase Reclosers) - Installations	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.4.1	Detailed inspections of distribution electric lines and equipment	Expense Underspend: Variance Amount $1M - $5M	PG&E did not spend $2.08M of the planned $100.38M, 2% of the total Expense amount initially allocated for this initiative.

			No Capital amount was planned or spent for this WMP initiative.	
Verification of QA/QC Programs	7.3.4.1 - D.01	Detailed Inspections - Distribution	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.4.1 - D.01	Detailed Inspections - Distribution	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.4.10	Other discretionary inspection of transmission electric lines and equipment, beyond inspections mandated by rules and regulations	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $4.3M of the planned $4.3M, 100% of the total Expense amount initially allocated for this initiative. PG&E did not spend $2.58M of the planned $3.7M, 70% of the total Capital amount initially allocated for this initiative.
Verification of Funding	7.3.4.12	Patrol inspections of transmission electric lines and equipment	Expense Underspend: Variance Amount $0M - $1M No Capital	PG&E did not spend $34.2K of the planned $0.08M, 41% of the total Expense amount initially allocated for this initiative.

			amount was planned or spent for this WMP initiative.	
Verification of Funding	7.3.4.13	Pole loading assessment program to determine safety factor	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $170.6K of the planned $9.12M, 2% of the total Expense amount initially allocated for this initiative.
Verification of QA/QC Programs	7.3.4.14 - D.09	Asset Inspections - Quality Assurance	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.4.14 - D.09	Asset Inspections - Quality Assurance	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.4.15 - D.06	Supplemental Inspections - Substation Distribution	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.4.15 - D.06	Supplemental Inspections - Substation Distribution	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.4.15 - D.07	Supplemental Inspections -	Activity Validated	Compliant with the 2022 WMP, per Data Request

		Substation Transmission		
WMP Activity Verification	7.3.4.15 - D.07	Supplemental Inspections - Substation Transmission	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.4.15-D	Substation inspections, Enhanced Distribution, Substation	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $1.44M of the planned $4.4M, 33% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.4.15-T	Substation inspections, Enhanced Transmission, Substation	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $17.1K of the planned $1.76M, 1% of the total Expense amount initially allocated for this initiative.

Verification of Funding	7.3.4.16	Other, Substation inspections, Generation	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $105.3K of the planned $1.14M, 9% of the total Expense amount initially allocated for this initiative.
Verification of QA/QC Programs	7.3.4.16 - D.08	Supplemental Inspections - Hydroelectric Substations and Powerhouses	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.4.16 - D.08	Supplemental Inspections - Hydroelectric Substations and Powerhouses	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.4.17 - D.10	HFTD/HFRA Open Tag Reduction - Distribution	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.4.17 - D.10	HFTD/HFRA Open Tag Reduction - Distribution	Activity not Validated	Not Compliant with the 2022 WMP, 9,049 E tags not completed as further described in Section 3.1.3.
Verification of QA/QC Programs	7.3.4.17 - D.11	HFTD/HFRA Open Tag Reduction - Transmission	Activity Validated	Compliant with the 2022 WMP, per Data Request

WMP Activity Verification	7.3.4.17 - D.11	HFTD/HFRA Open Tag Reduction - Transmission	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.4.2	Detailed inspections of transmission electric lines and equipment	Expense Underspend: Variance Amount $10M - $20M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $18.38M of the planned $86.71M, 21% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Favorable unit cost - Aerial Inspection (BF2) desktop review contract updated with favorable rates."
Verification of QA/QC Programs	7.3.4.2 - D.02	Detailed Inspection Transmission – Ground	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.4.2 - D.02	Detailed Inspection Transmission – Ground	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.4.2 - D.03	Detailed Inspection Transmission – Climbing	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.4.2 - D.03	Detailed Inspection Transmission – Climbing	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.4.2 - D.04	Detailed Inspection Transmission – Aerial	Activity Validated	Compliant with the 2022 WMP, per Data Request

WMP Activity Verification	7.3.4.2 - D.04	Detailed Inspection Transmission – Aerial	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.4.4	Infrared inspections of distribution electric lines and equipment	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $238K of the planned $2.23M, 11% of the total Expense amount initially allocated for this initiative.
Verification of QA/QC Programs	7.3.4.4 - D.05	Infrared Inspections - Distribution	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.4.4 - D.05	Infrared Inspections - Distribution	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.4.6.1	Intrusive pole inspections, Distribution	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this	PG&E did not spend $685.8K of the planned $21.24M, 3% of the total Expense amount initially allocated for this initiative.

			WMP initiative.	
Verification of Funding	7.3.4.6.2	Intrusive pole inspections, Transmission	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $455.8K of the planned $2.15M, 21% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.4.7	LiDAR Inspections of Distribution Electric Lines and Equipment	Expense Underspend: Variance Amount $1M - $5M Capital Overspend	PG&E did not spend $2.04M of the planned $10.5M, 19% of the total Expense amount initially allocated for this initiative.

Verification of Funding	7.3.4.8	LiDAR Inspections of Transmission Electric Lines and Equipment	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $5M - $10M	PG&E did not spend $1.29M of the planned $5.03M, 26% of the total Expense amount initially allocated for this initiative. PG&E did not spend $6.28M of the planned $11M, 57% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.4.8_DR_BVNA_024_Q005_R001, PG&E explained the variance in the Expense and Capital Spending as Follows: "The reduction of dollars ($4,252M) spent against the original forecast ($11,003M) for initiative 7.3.4.8 was the result of shifting these funds to higher priority LiDAR-based work that would achieve increased wildfire risk reduction. Specifically, the non-HFTD scope of work that was originally included in this initiative was removed in order to prioritize HFTD LiDAR modeling work for electrical clearance evaluation. This prioritized work spent $6.751M in 2022 and continues into 2023 as described in 2023 WMP Section 8.1.3.1.8. Additionally, please note that there were no quantitative or qualitative targets set for this work in our 2022 WMP."

Verification of QA/QC Programs	7.3.5.13 - E.05	Vegetation Management - Quality Assurance and Quality Verification	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.5.13 - E.05	Vegetation Management - Quality Assurance and Quality Verification	Activity Validated	Not Compliant with the 2022 WMP, Audits completed as described, but four (4) out of the seven (7) activities within this initiative did not meet the AQL target as further described in Section 3.1.3.
Verification of QA/QC Programs	7.3.5.17.1 - E.06	Defensible Space Inspections - Distribution Substation	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.5.17.1 - E.06	Defensible Space Inspections - Distribution Substation	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.5.17.2 - E.07	Defensible Space Inspections - Transmission Substation	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.5.17.2 - E.07	Defensible Space Inspections - Transmission Substation	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.5.17.3 - E.08	Defensible Space Inspections - Hydroelectric Substations and Powerhouses	Activity Validated	Compliant with the 2022 WMP, per Data Request

WMP Activity Verification	7.3.5.17.3 - E.08	Defensible Space Inspections - Hydroelectric Substations and Powerhouses	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.5.18.2	Substation vegetation management, Maintenance substation transmission	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $389.1K of the planned $1.25M, 31% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.5.19	Vegetation management system	Expense Underspend: Variance Amount over $50M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $71.14M of the planned $92.52M, 77% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "VM team provide update on 3/29 pm: - ~$75M of the forecast was earmarked to help with a transition away from EVM at the beginning of 2022. This was intended to revisit procedures, update trainings and work on lessons learned. However, the EVM program continued on through 2022, so

				these money was reallocated back to the EVM program."
Verification of Funding	7.3.5.2	Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment	Expense Underspend: Variance Amount $20M - $50M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $32.63M of the planned $1370.79M, 2% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.5.2_DR_BVNA_024_Q007_R001, PG&E explained the variance in the Expense Spending as Follows: "The primary driver of the expense underspend was due to reduced unit costs in the EVM program, partially offset by higher costs in the Routine Program: EVM: The spend was less than the forecast, which is attributable to both a lower volume and complexity of tree work and our ability to successfully work trees at a lower average unit cost, than predicted in the initial forecast model. Routine Distribution: the spend was greater than forecast due to 2021 under accrual (costs associated with the prior year's costs that were not included in that year's costs, ~$20M), schedule acceleration costs (~$18M), and higher average unit costs,

				partly offset by reduced volume of completed units. Tree Mortality (First Patrol): The spend was less than forecast, which was primarily driven by the cessation of recording incremental costs for completed Dead & Dying units identified on Routine patrols (first patrol). The Tree Mortality program was originally targeted to address the impact of increased volumes of dead and dying trees and was funded separately through the CEMA recovery mechanism. Under this mechanism the incremental costs of these first patrol units were creditable to the Tree Mortality Program. In 2022, the Tree Mortality program funding is consistent with the other vegetation management programs (i.e., the GRC rate case) and consequently costs for these units were not transferred to the Tree Mortality program. The 2022 Tree Mortality plan for costs and units did not anticipate this change and was not adjusted to remove these anticipated costs and units."
Verification of QA/QC Programs	7.3.5.2 - E.01	Enhanced Vegetation Management	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.5.2 - E.01	Enhanced Vegetation Management	Activity Field Verified. 177 Field Samples/20	Goal met/ exceeded 15 segment sites locations with residual debris

			Satellite Reviews	
Verification of QA/QC Programs	7.3.5.2 - E.02	Pole Clearing Program	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.5.2 - E.02	Pole Clearing Program	Activity Field Verified. 201 Field Samples	Goal met/ exceeded 4 structures were found 75 to 200-feet from provided coordinates.
Verification of QA/QC Programs	7.3.5.2 - E.10	Pole Clearing - per PRC 4292 in State Responsibility Areas (SRA)	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.5.2 - E.10	Pole Clearing - per PRC 4292 in State Responsibility Areas (SRA)	Activity Field Verified. 514 Field Samples	Goal met/ exceeded 1 structure was found 175-ft from provided coordinates. 1 structure with residual debris.
Verification of Funding	7.3.5.20	Additional vegetation management practices beyond regulatory requirements and recommendations	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $3.44M of the planned $32.35M, 11% of the total Expense amount initially allocated for this initiative.
Verification of QA/QC Programs	7.3.5.20 - E.09	Utility Defensible Space - Distribution	Activity Validated	Compliant with the 2022 WMP, per Data Request

WMP Activity Verification	7.3.5.20 - E.09	Utility Defensible Space - Distribution	Activity Field Verified. 205 Field Samples	Goal met (UDS) Cannot confirm exceeded amount of 168 units per the 1.46% sampling discrepancy. 3 locations with residual debris within 50-ft buffer. 8 structures with moderate regrowth.
Verification of Funding	7.3.5.3	Detailed inspections and management practices for vegetation clearances around transmission electrical lines and equipment	Expense Overspend Capital Underspend: Variance Amount $20M - $50M	PG&E did not spend $43.34M of the planned $78.7M, 55% of the total Capital amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Due to budget/financial constraints, some Right-of-Way work was deferred to 2023"
Verification of Funding	7.3.5.6	Improvement of inspections	Expense Underspend: Variance Amount over $50M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $74.34M of the planned $143.14M, 52% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Due to change in QC commitment, funding was reprioritized for higher risk work. Team finished 2021 commitment in 2022 (’21 VM Tree work was completed in the following year), did QC sampling, field quality assessments and quality assurance work.

				- Staffing levels for both internal and external work verifications were lower than forecasted combined with contractor conversions and efficiencies leading to reduced spend."
Verification of Funding	7.3.5.7	Remote sensing inspections of vegetation around distribution electric lines and equipment	Expense Underspend: Variance Amount $20M - $50M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $33.45M of the planned $37.09M, 90% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - Significant reduction in Ground based LiDAR scope due to the WMP commitment of 2k miles vs. potential opportunity to collect ~49% of HFTD spans. Re-flight/ aerial collection of data was de-scoped. WMP forecasted spend followed a 6AOI allocation based on an anticipate level of programmatic support."
Verification of QA/QC Programs	7.3.5.7 - E.03	LiDAR Ground Inspections - Distribution	Activity Validated	Compliant with the 2022 WMP, per Data Request

WMP Activity Verification	7.3.5.7 - E.03	LiDAR Ground Inspections - Distribution	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.5.8	Remote sensing inspections of vegetation around transmission electric lines and equipment	Expense Underspend: Variance Amount $5M - $10M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $5.23M of the planned $13M, 40% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-022_7.3.5.8_DR_BVNA_024_Q003_R001, PG&E explained the variance in the Expense Spending as Follows: "- The 2022 target spend of $13M included $10.5M for primary LiDAR contract and $2.5M for hyperspectral data collection work. - A budgeting error was made due to the seasonal nature of the work since it does not precisely correspond with a specific calendar year. The primary LiDAR contract of $10.5M started in August 2021 and ended in November 2022. Approximately $5.5M of the spend was in 2021 and $5M was in 2022. The 2023 LiDAR contract started in December 2022 with $2.8M of related spend in 202. Therefore in 2022, the total spend was approximately $7.8M (approximately $5M for the 2022 contract and approximately $2.8M for the 2023 contract). Thus, the spending for the 2021-2022 work season totaled $10.5M, while the total spending for the 2022

				calendar year totaled $7.8M. - In 2022, we removed the $2.5M hyperspectral data collection work form our 2022 contract. This data collection identifies tree species to further support targeted vegetation management. We reduced this scope of work because we determined it was more efficient use of resources to use historical data instead of the hyperspectral data. The reduction in scope did not impact our primary routine compliance detections."
Verification of QA/QC Programs	7.3.5.8 - E.04	LiDAR Routine Inspections - Transmission	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.5.8 - E.04	LiDAR Routine Inspections - Transmission	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.6.2	Crew-accompanying ignition prevention and suppression resources and services	Expense Underspend: Variance Amount $1M - $5M Capital	PG&E did not spend $2.65M of the planned $14.52M, 18% of the total Expense amount initially allocated for this initiative. PG&E did not spend $664.3K of the planned $0.69M, 96% of the total Capital amount initially allocated for this initiative.

			Underspend: Variance Amount $0M - $1M	
Verification of Funding	7.3.6.3	Personnel work procedures and training in conditions of elevated fire risk	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $191.6K of the planned $1M, 19% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.6.4-D	Protocols for PSPS re-energization, Distribution	Expense Underspend: Variance Amount $0M - $1M Capital Underspend: Variance Amount $1M - $5M	PG&E did not spend $820.8K of the planned $10.09M, 8% of the total Expense amount initially allocated for this initiative. PG&E did not spend $3.65M of the planned $4.94M, 74% of the total Capital amount initially allocated for this initiative.

Verification of Funding	7.3.6.4-T	Protocols for PSPS re-energization, Transmission	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $1.56M of the planned $2M, 78% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.6.5-D	PSPS events and mitigation of PSPS impacts , Distribution	Expense Underspend: Variance Amount over $50M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $68.81M of the planned $68.81M, 100% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - PSPS events did not happen as weather conditions was more favorable in 2022"
Verification of Funding	7.3.6.5-T	PSPS events and mitigation of PSPS impacts , Transmission	Expense Underspend: Variance Amount $1M - $5M No Capital	PG&E did not spend $1.8M of the planned $1.81M, 100% of the total Expense amount initially allocated for this initiative.

			amount was planned or spent for this WMP initiative.	
Verification of Funding	7.3.6.6	Stationed and on-call ignition prevention and suppression resources and services	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $4.05M of the planned $4.84M, 84% of the total Expense amount initially allocated for this initiative. PG&E did not spend $228.3K of the planned $0.23M, 99% of the total Capital amount initially allocated for this initiative.
Verification of Funding	7.3.6.7	Other, Aviation Support	Expense Underspend: Variance Amount $1M - $5M Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $3.57M of the planned $6.14M, 58% of the total Expense amount initially allocated for this initiative. PG&E did not spend $361.5K of the planned $0.33M, 111% of the total Capital amount initially allocated for this initiative.

Verification of Funding	7.3.6.8	Protective equipment and device settings	Expense Underspend: Variance Amount over $50M Capital Overspend	PG&E did not spend $59.7M of the planned $142.59M, 42% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s ARC Report Dated March 31, 2022 provided in DRU11694 as follows: "Variance mainly driven by: - EPSS Patrol lower than planned primarily due to improvements/efficiencies made by the EPSS program (e.g., daily EPSS enablement/disablement based on wildfire risk and installing fault indicators to narrow down circuit area for outage patrol)"
Verification of QA/QC Programs	7.3.6.8 - F.01	EPSS - Settings Design and Test	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.6.8 - F.01	EPSS - Settings Design and Test	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.6.8 - F.02	EPSS - Install Settings on Distribution Line devices	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.6.8 - F.02	EPSS - Install Settings on Distribution Line devices	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.6.8 - F.03	EPSS - Develop Enablement Standards and Procedures	Activity Validated	Compliant with the 2022 WMP, per Data Request

WMP Activity Verification	7.3.6.8 - F.03	EPSS - Develop Enablement Standards and Procedures	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.6.8 - F.04	EPSS - Reliability Improvements	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.6.8 - F.04	EPSS - Reliability Improvements	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of QA/QC Programs	7.3.7.1 - G.01	Data Governance - Identify and Centralize High Priority Data	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.7.1 - G.01	Data Governance - Identify and Centralize High Priority Data	Activity Validated	Compliant with the 2022 WMP, per Data Request
Verification of Funding	7.3.7.2	Collaborative research on utility ignition and/or wildfire	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $570.3K of the planned $0.87M, 66% of the total Expense amount initially allocated for this initiative.

Verification of Funding	7.3.7.5	Other, IT projects to support wildfire mitigation work	Expense Underspend: Variance Amount $1M - $5M Capital Overspend	PG&E did not spend $1.04M of the planned $45.1M, 2% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.8.1	Allocation methodology development and application	Expense Underspend: Variance Amount $1M - $5M Capital Overspend	PG&E did not spend $2.22M of the planned $3.49M, 64% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.8.2	Risk reduction scenario development and analysis	Expense No Variance Capital Underspend: Variance Amount $0M - $1M	PG&E did not spend $399.3K of the planned $0.91M, 44% of the total Capital amount initially allocated for this initiative.
Verification of QA/QC Programs	7.3.8.3 - H.01	Risk Spend Efficiency - Develop and Share Governance Process	Activity Validated	Compliant with the 2022 WMP, per Data Request
WMP Activity Verification	7.3.8.3 - H.01	Risk Spend Efficiency - Develop	Activity Validated	Compliant with the 2022 WMP, per Data Request

		and Share Governance Process		
Verification of Funding	7.3.9.1	Adequate and trained workforce for service restoration	Expense Underspend: Variance Amount $0M - $1M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $388.6K of the planned $7.67M, 5% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.9.2	Community outreach, public awareness, and communications efforts	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $4.58M of the planned $21.74M, 21% of the total Expense amount initially allocated for this initiative.

Verification of Funding	7.3.9.3	Customer support in emergencies	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $1.13M of the planned $3.41M, 33% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.9.4	Disaster and emergency preparedness plan	Expense Underspend: Variance Amount $1M - $5M No Capital amount was planned or spent for this WMP initiative.	PG&E did not spend $2.13M of the planned $6.84M, 31% of the total Expense amount initially allocated for this initiative.
Verification of Funding	7.3.9.5	Preparedness and planning for service restoration	Expense Underspend: Variance Amount $5M - $10M No Capital	PG&E did not spend $5.44M of the planned $15.79M, 34% of the total Expense amount initially allocated for this initiative. Per the Variance Explanations referenced in PG&E"s DRU11935 Response within DRU11935_Audit_IE_WSD-

			amount was planned or spent for this WMP initiative.	022_7.3.9.5_DR_BVNA_024_Q002_R001, PG&E explained the variance in the Expense Spending as Follows: "Sixty-five helicopters were budgeted as part of the exclusive use contract that was scheduled to support Public Safety Power Shutoff (PSPS). However, as there were no PSPS events in 2022, the flight hours ended up fewer than planned which caused the underspend. please note that there were not quantitative or qualitative targets set for this work in our 2022 WMP."