



June 20, 2024

Jay Leyno
Director, Wildfire Mitigation PMO
Pacific Gas and Electric Company
300 Lakeside Drive
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Subject: Notice on Errata and Supplemental Reportable Updates for Pacific Gas and Electric Company 2025 Wildfire Mitigation Plan Update

Mr. Leyno:

Pacific Gas and Electric Company (PG&E) submitted its 2025 Wildfire Mitigation Plan Update (2025 WMP Update) and revised 2023-2025 Base Wildfire Mitigation Plan (Revised Base WMP) (redlined and clean versions) to the Office of Energy Infrastructure Safety's (Energy Safety) 2023-2025 WMP docket on April 2, 2024. PG&E submitted non-substantive errata identified by PG&E to the same docket on May 14, 2024.¹

Request for Errata

Energy Safety reviewed PG&E's submissions and identified additional non-substantive errors for PG&E to correct, listed in Appendix A.

Supplemental Reportable Updates

PG&E submitted a Change Order Request for its WMP to Energy Safety's 2023-2025 WMP docket on January 8, 2024.² PG&E submitted a subsequent Request to Correct Information Provided in the 2024 Change Order on May 21, 2024.³ Energy Safety issued a decision on

¹ PG&E's 2025 WMP Update Non-Substantive Errata, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56678&shareable=true>, accessed June 6, 2024).

² PG&E's Change Order Request, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56148&shareable=true>, accessed May 30, 2024).

³ PG&E Request to Correct Change Order, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56711&shareable=true>, accessed May 30, 2024).

Notice on Errata and Supplemental Reportable Updates for PG&E 2025 WMP Update

PG&E's Change Order Request on May 31, 2024,⁴ approving 11 of PG&E's requests to change its 2024 targets and rejecting 8 of its requests.

To account for effects from the Change Order Decision being issued after PG&E's 2025 WMP Update submission, PG&E may submit supplemental reportable updates for 2025 for the following:

- AI-08: Supplemental Inspections – Substation Distribution
- AI-09: Supplemental Inspections Substation Transmission
- AI-10: Supplemental Inspections – Hydroelectric Substations and Powerhouses
- VM-04: Tree Removal Inventory
- VM-05: Defensible Space Inspections – Distribution Substation
- VM-06: Defensible Space Inspections – Transmission Substation
- VM-07: Defensible Space Inspections – Hydroelectric Substations and Powerhouses
- PS-06: Provide Batteries to Customers at risk of PSPS or EPSS

PG&E must provide a list of all supplemental reportable updates in a cover letter, describe the supplemental reportable updates in its newly revised 2025 WMP Update, and show the supplemental reportable updates in redline in its Revised Base WMP. Any reportable updates must comply with the 2025 WMP Update Guidelines.⁵ Energy Safety will separately issue a schedule for public comment on the submission.

PG&E must revise its 2025 WMP Update and Revised Base WMP (both redlined and clean versions) to correct the non-substantive errors identified in Appendix A and to include supplemental reportable updates, as described above, and submit its newly revised 2025 WMP Update and Revised Base WMP to Energy Safety's 2023-2025 WMP docket by July 5, 2024.

PG&E must also include in these versions of the 2025 WMP Update and Revised Base WMP the changes approved per Energy Safety's Decision on PG&E's Change Order Request.

⁴ Decision on Pacific Gas & Electric Company's Change Order Request in relation to its 2023-2025 Base Wildfire Mitigation Plan (May 2024) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56752&shareable=true>, accessed June 4, 2024).

⁵ [Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed June 14, 2024).

Notice on Errata and Supplemental Reportable Updates for PG&E 2025 WMP Update

PG&E must not make any changes to its WMP beyond corrections to the errors listed in Appendix A, the supplemental reportable updates to the initiative targets listed above, and the target changes approved in Energy Safety's Decision on PG&E's Change Order Request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Suzie', with a stylized flourish at the end.

Suzie Rose
Program Manager, Electrical Safety Policy Division
Office of Energy Infrastructure Safety

APPENDIX A

Table 1. Non-Substantive Errors in PG&E 2025 WMP Update⁶

Section	Document Page Number	Correction or Clarification
B.1.1 WDRM v4	p. 6-12	<p>The 2025 WMP Update Guidelines require that an electric corporation with significant updates to its risk models summarize the top 5% of its highest-risk circuits in two tables in its 2025 WMP Update.⁷ PG&E provided significant updates to its risk models in its 2025 WMP Update, however it did not provide these tables.</p> <p>PG&E must include tables of its top 5% ignition risk circuits/segments/spans and top 5% PSPS risk circuits/segments/spans for its new model version in its 2025 WMP Update.</p> <p>Formatting requirements are provided in the 2025 WMP Update Guidelines.⁸</p>
PG&E-23-26 – Evaluation and Reporting of Safety Impacts Related to EPSS	p. 130-134	<p>In response to PG&E-23-26, PG&E states that its analysis “to understand the tradeoffs between reliability and wildfire risk mitigation when EPSS circuits are enabled” should be completed by the second quarter of 2024.⁹</p> <p>PG&E must update its response to PG&E-23-26 in its 2025 WMP Update to include this analysis.</p>

⁶ PG&E’s 2025 WMP Update, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56401&shareable=true>, accessed May 30, 2024).

⁷ See 2025 WMP Update Guidelines, section 1.1 Significant Updates [to Risk Models], p. 7, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed May 20, 2024).

⁸ See 2025 WMP Update Guidelines, section 1.1.1 Top Risk-Contributing Circuit, Segments, or Spans, pp. 7-8, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed May 20, 2024).

⁹ PG&E 2025 WMP Update, pp. 133-134 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56401&shareable=true>, accessed May 20, 2024).

Table 2. Non-Substantive Errors in PG&E Revised Base WMP^{10,11}

Section	Document page number/ PDF page number	Correction or Clarification
Section 6.4.2 Top Risk-Contributing Circuits/Segments	p. 201-202 (redlined version)	<p>PG&E did not update the top risk circuit segments table to reflect the results of the significant updates to its risk models reported in its 2025 WMP Update.</p> <p>PG&E must include an updated top risk circuit segments table in its Revised Base WMP that reflects the updates to risk models reported in its 2025 WMP Update.</p> <p>The Revised Base WMP (redlined and clean versions) must include both the original Table 6-5: PG&E’s Top Risk Circuit Segments and a table showing the updated table titled “Table 6-5.B: PG&E’s Top Risk Circuit Segments – 2025 Update.” This new table must be shown as a tracked “addition” in the redlined version of the Revised Base WMP.</p>
Section 8.1.2, Grid Design and System Hardening, Table 8.1.2-1: Overall System Hardening Mileage Forecast	p. 402 (redlined version)	<p>PG&E included updates to its 2023 and 2024 system hardening mileage forecasts in Table 8.1.2-1. Updates to 2023 and 2024 forecasts are not permissible in the 2025 WMP Update.</p> <p>PG&E must remove the updates to 2023 and 2024 hardening mileage forecast numbers and correct associated footnotes in Table 8.1.2-1.</p>

¹⁰ PG&E’s Updated 2023-2025 WMP redlined, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56403&shareable=true>, accessed May 30, 2024).

¹¹ PG&E Updated 2023-2025 WMP clean, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56402&shareable=true>, accessed May 30, 2024).

APPENDIX A: Non-Substantive Errors in PG&E 2025 WMP Update and WMP

Section	Document page number/ PDF page number	Correction or Clarification
Section 8.1.2.2, Tables 8.1.2-3 and RN-PGE-23-05-2, Undergrounding Workplan	p. 410, 422 (redlined version)	<p>PG&E’s undergrounding workplan shown in Tables 8.1.2-3 and RN-PGE-23-05-2 does not align with the 2025 undergrounding target updates provided in PG&E’s 2025 WMP Update.</p> <p>PG&E must update the undergrounding workplan in its Revised Base WMP to align with the 2025 target updates provided in its 2025 WMP Update.</p>
Section 8.5.3 Engagement with Access and Functional Needs Populations	p. 908 (redlined version)	<p>PG&E added footnotes (259 and 260) referencing proposed changes from its Change Order Request. These changes were rejected in the Change Order Decision.</p> <p>PG&E must remove the footnotes referencing the Change Order Request.</p>