Meredith Allen
Vice President
Regulatory Affairs

Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94619

August 1, 2024

OFFICE OF ENERGY INFRASTRUCTURE SAFETY OF THE CALIFORNIA NATURAL RESOURCES AGENCY

Subject: **Pacific Gas and Electric Company's Quarterly Notification Regarding the Implementation of Its Wildfire Mitigation Plan and Its Safety Recommendations; Submitted Pursuant to Public Utilities Code Section 8389(e)(7), the Office of Energy Infrastructure Safety's Compliance Operational Protocols, and Assembly Bill 1054**

Pacific Gas and Electric Company (PG&E) respectfully submits this Quarterly Notification detailing: (1) the status of our current Wildfire Mitigation Plan (WMP); (2) recommendations of the most recent safety culture assessment; (3) recommendations of the Board of Directors' safety committee meetings that occurred during the quarter; and (4) a summary of the implementation of any safety committee recommendations from the previous quarterly submittal. This Quarterly Notification is provided pursuant to California Public Utilities Code (PUC) Section 8389(e)(7), the Office of Energy Infrastructure Safety's (Energy Safety) Compliance Operational Protocols, issued on February 16, 2021 (Compliance Operational Protocols) and subsequently clarified on September 8, 2021 by Energy Safety, and the 2023 Safety Certification Guidelines issued on June 28, 2023.[1]

Background

On July 12, 2019, Governor Gavin Newsom signed Assembly Bill (AB) 1054 into law, adding Section 8389(e)(7) to the PUC. As one of the conditions for the issuance of a safety certification, Section 8389(e)(7) — as amended by AB 148 — requires documentation of the following:

> The electrical corporation is implementing its approved wildfire mitigation plan. The electrical corporation shall file a notification of implementation of its wildfire mitigation plan with the office and an information-only submittal with the commission on a quarterly basis that details the implementation of both its approved wildfire mitigation plan and recommendations of the most recent safety culture assessments by the commission and office, and a statement of the recommendations of the board of directors safety committee meetings that occurred during the quarter. The notification and information-only submittal shall also summarize the implementation of the safety committee recommendations from the electrical corporation's previous notification and submission. If the office has reason to doubt the

---

[1] Energy Safety issued "Submission of Safety Certification Request and Supporting Documents" on September 8, 2021, which, among other items, clarified Assembly Bill 148, effective as of July 22, 2021, updated PUC Section 8389(e)(7) to reporting requirements, notably that the Quarterly Advice Letter (QAL) would change in format, but not content, to the Quarterly Notification.

veracity of the statements contained in the notification or information-only submittal, it shall perform an audit of the issue of concern. The electrical corporation shall provide a copy of the information-only submittal to the office.

On February 16, 2021, Energy Safety issued Compliance Operational Protocols which, in addition to the existing requirements established by Section 8389(e)(7), provide further guidance and requirements for electrical corporations' quarterly submissions. Specifically, the Compliance Operational Protocols standardize the quarterly submission dates across electrical corporations and describe the information and materials to be included in the Quarterly Notifications.

On December 14, 2022, Energy Safety issued new Data Guidelines with the 2023-2025 WMP Technical Guidelines. The Data Guidelines require the submission of Quarterly Data Reports (QDR), concurrent with the QN, and detailed initiative commitment progress in Table 1 of the QDR.

Additionally, and pursuant to the 2023 Safety Certification guidelines, PG&E is simultaneously submitting this quarterly notification to the California Public Utilities Commission as an information-only submittal to the following email address: safetypolicydivision@cpuc.ca.gov.

This Quarterly Notification submission provides the requested information for the second quarter (Q2) of 2024, pursuant to the above-identified guidelines from Energy Safety and statutory requirements.

Q2 2024 Update

WMP Regulatory Background and Scope of Quarterly Notification

We submitted our initial version of the Base 2023-2025 WMP on March 27, 2023, and a corrected version on April 6, 2023.[2] A revision notice was issued by Energy Safety on June 22, 2023, and we submitted a revised WMP on August 7, 2023. On September 11, 2023, we submitted a request to Energy Safety to supplement our Revision Notice Response, which was granted on September 12, 2023. We submitted our Supplemental Revision Notice Response on September 27, 2023. We received final approval of our WMP on December 29, 2023, and submitted a revised 2023-2025 Base WMP on January 8, 2024. On April 2, 2024, we submitted an updated version of our Base 2023-2025 WMP, incorporating changes based on our 2025 WMP Update, which was submitted on the same date. On June 7, 2024, at Energy Safety's direction, we submitted a further revised version of our 2023-2025 Base WMP based upon the 2024 Change Order decision. More recently on July 5, 2024, we submitted a revised version of our 2023-2025 Base WMP to correct non-substantive errors identified by Energy Safety.

---

[2]   PG&E's 2023-2025 WMP is available at: www.pge.com/wildfiremitigationplan.

We submitted our 2024 Change Order on January 8, 2024. The Change Order requested updates to some programs and targets for the 2024 year. Energy Safety issued a decision on May 31, 2024, approving 11 of the 19 requested changes. As a result, we updated our commitments based on Energy Safety's decision.

Table 1 of our Q2 2024 QDR, which is being submitted concurrently with this Quarterly Notification, provides progress updates for our 47 initiative commitments, which include both targets and objectives.[3] This Quarterly Notification provides additional details associated with these initiative commitments.

2024 WMP Initiative Commitment Summary

A table with all 47 initiative commitments, including the status of each, is provided in Appendix 1. A summary of the status of these initiative commitments, broken down by WMP category, is provided in Table 1 below. The Compliance Operational Protocols indicate that five pre-designated status categories should be used for each initiative commitment.[4]

Table 1: Summary of 2024 WMP Initiative Commitments

2023 WMP Category	Completed	In Progress	Planned	Delayed	Total
A. Situational Awareness and Forecasting	0	3	0	0	3
B. Grid Design, Operations and Maintenance	4	12	0	3	19
C. Vegetation Management and Inspections	6	10	1	1	18
D. Public Safety Power Shut off	0	3	0	0	3
E. Emergency Preparedness Plan	0	2	0	0	2
F. Community Outreach and Engagement	0	2	0	0	2
Total	**10**	**32**	**1**	**4**	**47**

In addition to the categories listed above, we note the following about four of our initiatives:

---

[3] This total does not include five three-year objectives completed in 2023, eleven three-year objectives with no compliance milestones due in 2024, and our fifteen ten-year objectives since there will be minimal updates for this long-term work in 2024.

[4] Compliance Operational Protocols at p. 9 (indicating status should be: completed, in progress, planned, delayed, or canceled). Please note that there are no canceled initiatives, so we have not included a column for that status.

- VM-06 (Defensible Space Inspections - Transmission Substation): Our 2024 Change Order request to change the target for this work from 55 to 54 was denied on procedural grounds. The reduction in the target is the result of a transfer in ownership of one of the substations. As a result, we will not be able inspect 55 substations and will provide transfer documentation during the compliance process. Inspections of all the remaining substations were completed by the end of Q2. Thus, we are listing this target as 'Completed' in our Q2 QDR.

- VM-07 (Defensible Space Inspections - Hydroelectric Substations and Powerhouses): Our 2024 Change Order request to lower the target for this work from 61 to 59 was denied on procedural grounds. The reduction in the target is the result of a transfer in ownership of two of the substations. As a result, we will not be able to inspect 61 substations and will provide transfer documentation during the compliance process. Inspections of all the remaining substations were completed by the end of Q2. Thus, we are listing this target as 'Completed' in the Q2 QDR.

- VM-17 (Distribution Second Patrol): When creating our workplan for 2024, our GIS pull yielded only 25,485 miles, slightly lower than the 2024 WMP target of 25,685 that was provided as a forecast in 2023. Since we will not be able to meet the forecasted end-of-year target, we will provide documentation for the discrepancy in mileage during the compliance process. We are currently listing this target as 'In Progress' in the Q2 QDR.

- VM-18 (VM for Operational Mitigations (VMOM)): Our initial find rate for this work was projected to be 15 trees per mile, but the actual find rate came in much lower at seven trees per mile. Given this lower actual find rate, we are forecasted to have 5,476 trees to mitigate as compared to the initial WMP target of 6,500 trees. As a result, we will not be able to meet the initially forecasted annual target of 6,500 trees. Although we will not meet the initially forecasted number of trees, we will still perfume work on 45 circuit protection zones, totaling approximately 729 miles. Thus, we are currently listing this Target as 'In Progress' in the Q2 QDR.

Details on the Delayed Initiative Commitment

In this section, we provide information regarding the initiative commitments that were designated as "Delayed" at the end of Q2. In Table 7-3-1 and Table 7-3-2 of the WMP, we provided a Unique ID for each initiative commitment.[5] Below, we included the Unique ID, the name of the activity, a brief description of the activity, and the status.

For the four initiatives that are currently behind schedule, we implemented catch back plans and forecast dates for when we anticipate each commitment will be back on track to the original plan.

AI-08 Supplemental Inspections - Substation Distribution

This initiative involves completing supplemental inspections on 76 distribution substations.

The program is behind target with 14 inspections completed as of the end of Q2 against the Q2 target of 68 inspections. The delay was due to receiving the Change Order decision on May 31, 2024, preventing the safe completion of ground and infrared inspections by the end of Q2 (all aerial inspections were completed on time, in line with the 2024 change order request). A catch back plan is in place, and we are on track to complete all aerial, ground, and infrared inspections by the end of Q3.

AI-09 Supplemental Inspections - Substation Transmission

This initiative involves completing supplemental inspections on 36 transmission substations.

The program is behind target with eight inspections completed as of end of Q2 against the Q2 target of 33 inspections. The delay was due to receiving the Change Order decision on May 31, 2024, preventing the safe completion of ground and infrared inspections by the end of Q2 (all aerial inspections were completed on time, in line with the 2024 change order request). A catch back plan is in place, and we are on track to compete all aerial, ground, and infrared inspections by the end of Q3.

AI-10 Supplemental Inspections - Hydroelectric Substations and Powerhouses

This initiative involves completing supplemental inspections on 46 hydroelectric generation substations and powerhouses.

The program is behind target with five inspections completed as of end of Q2 against the Q2 target of 45 inspections. The delay was due to receiving the Change Order decision on May 31, 2024, preventing the safe completion of ground and infrared inspections by the end of Q2 (all aerial inspections were completed on time, in line with

---

[5] PG&E 2023 WMP at pp. 287, 332.

the 2024 change order request). A catch back plan is in place, and we are on track to compete all aerial, ground, and infrared inspections by the end of Q3.

VM-22 Vegetation Management – Quality Control

This initiative involves performing Quality Control and Quality Verification audits and reviews of various aspects of our Vegetation Management program to identify gaps and areas of improvement.

The program is behind the vegetation pole clearing pass rate of 88% with a Q2 actual pass rate of 85.1%. The program stood down 13 contractor techs that had findings below the targeted 88% pass rate. The vendor will provide a return-to-work corrective action plan, including documentation of audit and retraining of techs with a forecast completion date of August 5, 2024. The program anticipates meeting the target by December 31, 2024.

Implementation of PG&E's Latest Safety Culture Assessment

PG&E's 2023 Safety Culture Assessment (SCA) was issued by Energy Safety on March 22, 2024. The Safety Culture Assessment evaluated the personal and wildfire safety culture at PG&E through the use of a workforce survey, management self-assessments, and interviews. The Safety Culture Assessment provided the following four recommendations for PG&E to act upon:

1. PG&E should strengthen its safety communications by improving safety-related communication, addressing worker concerns about the lack of easy access to information on near misses and information on wildfire conditions, and providing leadership listening sessions.

2. PG&E should optimize its safety-enabling systems to improve the quality of event investigations and improve the hazard and near-miss reporting process to align expectations on what to report and when to report. PG&E should also continue to take steps to increase workers' psychological safety, building confidence in their speak-up and stop-the-job authority.

3. PG&E should continue building on its current worker training plan by:

   o Incorporating new safety-related training modalities. This should include more hands-on training and topics that enable all levels of the organization to develop a more proactive and curious mindset. It should also include assessing participant feedback and using it to make training more effective, relevant, and engaging.

   o Conducting post-training peer learning activities. This should include group discussions. PG&E should also cultivate a mentoring program and/or encourage the appointment of a senior team member to be a "safety steward"—someone experienced who can be an effective communicator about responding to real-life situations that involve judgement calls in the field that are not covered by standard policies or procedures.

4. PG&E should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.

On April 5, 2024, PG&E formally notified Energy Safety that it agreed to implement all the findings and recommendations identified in the Safety Culture Assessment and committed to facilitate their implementation.

During Q2 2024, some of the actions PG&E completed to advance the implementation of the recommendations from the 2023 Energy Safety Culture Assessment include:

- Pursuant to recommendation #1,

o Driving is one of PG&E's highest safety risks. A companywide mid-year Safety Week from June 24-28 focused on vehicle safety. Leadership learning sessions were held on May 21 (650 attendees), May 28 (675 attendees), and May 30 (390 attendees). Supervisors were engaged in Safety Week preparation learning sessions on June 4 (525 attendees) and June 6 (60 attendees). The campaign involved leaders facilitating discussion with their teams after viewing a video about the following daily topics – Day 1: Ownership to driving safely, Day 2: Conducting 360 walkarounds and practicing human performance tools that can help prevent motor vehicle incidents and injuries, Day 3: Driving distraction-free, Day 4: Refraining from fatigued driving, and Day 5: Knowing what steps to take when a vehicle breaks down and road assistance is necessary. The week culminated in encouraging coworkers to create a safety stand of their commitment to demonstrating safe behaviors.

o A safety alert message from the Chief Safety Officer was published to reinforce the requirement to use a spotter (when available) when drivers are backing a vehicle.

o All coworker and leadership listening sessions were offered during monthly Leadership Town Hall meetings, Third Thursdays of the month when all Operations coworkers dedicate the day to focusing on safety discussions and activities, an Operations all coworker business update that reinforced and recognized safe behaviors and where psychological safety is modeled by leaders, and Safety Weekly Operating Review meetings where safety recognition is presented, safety incidents and functional area improvement actions are discussed, and key performance indicator status updates are given.

o Psychological safety is foundational to a healthy speak-up safety culture. Regular safety messages are published in the Daily Safety Update reinforcing the value and practical application of psychological safety in the workplace. Psychological safety is a focus of the company's safety orientation, before starting any meeting or task, reminding coworkers to practice vulnerability and transparency, avoid blame, invite new ideas, disagree respectfully, and prioritize mental health by encouraging self-care.

o Reaching our coworkers in different ways to ensure they are informed about safety projects, programs, initiative, and campaigns is a priority. In addition to the Daily Digest articles published in the enterprise newsletter, the weekly EH&S Snapshot (i.e., newsletter) was sent every Monday – an edition for hybrid coworkers and one for frontline coworkers. The Frontline edition provides a daily safety message, sections from the Code of Safety Practices and 2-3 articles such as near hits, safety incidents and learnings, driving safety, and Code of Safe Practices to share during bull room meetings. The Hybrid edition contains articles published that week

sorted under categories such as occupational health, coworker safety, culture, and the Corrective Action Program (CAP).

o Daily safety messages were published in the Daily Safety Update emailed to all coworkers each morning to be reviewed and discussed during the Daily Operating Reviews. These messages inform coworkers about serious incident alerts, near hits, safety best practices, safety recognition of coworkers and contract partners, psychological safety, upcoming listening and learning sessions, and other timely messaging that builds a healthy safety culture.

o Wildfire safety and prevention awareness messages were included in the Daily Safety Update starting in June and will continue through Q3. One of the messages connected wildfire events with the trauma and stress that coworkers associate with them and the important resource that the Employee Assistance Program can provide (e.g., counseling services). The Chief Safety Officer sent a message to all coworkers raising their awareness about heat illness prevention in advance of the heat wave experienced towards the end of June.

o Lone worker safety leadership learning sessions were held to ensure leaders and their teams know they must carry a satellite/GPS-enabled device (InReach, Blackline or other approved tool) on their person at all times. If no satellite device is available, then a second worker is required, or work must be paused and further evaluated. Several sessions engaged cross-functional impacted leaders and lone workers on June 7 (47 attendees), June 12 (60 attendees), and June 13 (98 attendees). Ensuring our lone workers can obtain help when needed can prevent near hits and serious injuries.

o In support of PG&E's speak-up culture, the Enterprise Corrective Action Program (CAP) team hosted a series of CAP roadshow events, to empower coworkers to identify, evaluate, track, and resolve safety issues within their functional areas, at the Chico, Eureka, and San Carlos Service Centers and the San Jose office. These roadshows are a critical input in promoting the Near Hit program since near hits are reported and tracked via the CAP system.

o The Operations Safety Collaboration Center (OSCC) has focused on preventing Serious Injuries and Fatalities (SIFs) and identifying today's critical safety risks, driving cultural behavior improvements, and enabling high-energy essential controls for workers to fail safely. Three critical areas for improvement (AFIs) were approved and action plans were developed. The AFIs are: 1. High energy controls - conducting field-facing workshops on safety engagements, identifying high energy hazards during work planning and safety engagements, and using SIF prevention data for leading indicators. 2. Organizational culture and safety mindset – creating

awareness and conducting workshops on organizational culture with grassroots, frontline leaders, and coworkers. 3. Change management – assessing change saturation and prioritizing change based on risk and employing robust change management strategies to increase project outcomes.

- o PG&E sponsors frontline coworkers in the development of the Grassroots Safety Council. They are focused on providing PG&E Grassroots Safety Team representatives an opportunity to discuss proposed solutions and innovations to systemic safety issues that result in a stronger safety culture mindset while performing work for PG&E.

- Pursuant to recommendation #2,

  - o Field Safety Specialists were trained to perform Energy Based Observations (EBO). These observations prioritize preemptive identification of high energy exposures and corresponding essential controls, documenting, and passing on learnings from these interactions, and analyzing basic trending of the related data.

  - o The Enterprise Cause Evaluation team provided instructor-led training that covered all roles and responsibilities involved in the cause evaluation process. These training sessions' objective was to improve participant and leader knowledge of the criteria required to execute quality cause evaluations and to support the development of quality cause evaluation final reports. In addition, the team developed a quality rubric, which is applied after report completion, to identify specific areas of improvement, drive these improvements, and trend the results to support the identification of future continuous improvement opportunities.

  - o In addition, the Cause Evaluation Team benchmarked High Energy Injury Investigation practices with other California electric and gas utilities. This effort resulted in team members attending a weeklong training course and piloting the TapRoot process in Q2.

  - o Each workgroup performing high-risk work has completed training on how to identify high energy sources (Stuff That Kills You or "STKY") and on the importance/value of hazard identification and control establishment.

  - o Near Hits are entered via the Corrective Action Program (CAP) and are tracked in the Near Hit Dashboard. Near Hits are discussed enterprise-wide in the Daily Operating Reviews (DORs) and Weekly Operating Reviews (WORs) as a leading indicator. Near Hits are now featured every Monday as part of the Daily Safety Update, which is distributed to all coworkers, with a focus on any new Near Hits that occurred in the previous 24 hours. Bi-monthly messages published in the Daily Digest (also distributed to all coworkers) have focused on what a Near Hit is, why they are important, and how to report them using the CAP mobile app.

The second message from June focused on Near Hit program resource availability to help encourage sharing and trending awareness. Presentations were held at the North and South Grassroots summits to educate about Near Hits. Learning sessions were held with the CAP Management Team as well as several Functional Area CAP teams, focused on the Near Hit Standard and identifying what to report, when to report, and the critical details to provide in the report.

o The Enterprise Safety Recognition Program was rolled out to recognize and reward coworkers who exhibit proactive safe behaviors, including stopping work. Coworkers are celebrated by their recognizers and the top recognitions are celebrated during the CEO's Weekly Operating Review. This is a new program that is ongoing.

o The Senior Vice President of Customer Experience held an interactive learning session for all coworkers about psychological safety and building trust with self, team members and across PG&E.

o PG&E's Diversity, Equity, Inclusion and Belonging (DEIB) leaders held monthly sessions on various psychological safety topics including trust, speak-up and conflict management.

- Pursuant to recommendation #3,

o PG&E continues to expand training modalities and increase hands-on training for employees. The summary below includes key training statistics through Q2 2024:

  i. 44,320 employees and contractors completed PG&E training.

  ii. 687,407 hours of PG&E training completed.

  iii. 32% was web-based training (WBT) conducted through a work computer or mobile device.

  iv. 68% hands-on instructor-led training.

  v. Hands-on instructor-led training hours increased 16% when comparing Q1 to Q2 2024 to the same period in 2023.

o PG&E continues to reduce WBT and increase hands-on, skill-based training by performing difficulty-importance-frequency analyses and adjusting non-compliance WBT frequencies as appropriate. In 2024, this effort has resulted in over 11,000 hours of WBT reduction and a 6% reduction in total number of WBTs completed by employees when comparing Q1 to Q2 2024 to the same period in 2023.

o In addition to the 30 formal apprenticeship programs, PG&E continues to expand hands-on refresher training focused on improving employee performance and safety. As of July 2024, grounding refresher training for

electric operations is 93% complete, with more than 1,300 electric operations employees trained. Controller training for electric operations has been developed, and implementation will begin in Q3. Excavation safety competent person training has been updated based on updates to the Excavation Safety Manual, and refresher training for over 1,500 employees will be implemented and completed in Q3. Additionally, in Q2 2024, gas for electric training was implemented. As a result, more than 400 gas operations employees have been trained to better identify electric safety risks through improved knowledge and skills.

o   Training effectiveness is assessed through four levels.

Level 1 – All formal training includes training effectiveness surveys for the first six months that a course is delivered. Course participants are asked for their feedback related to the quality of the facilitation, materials, and the applicability to their jobs. The survey uses a five-point scale, and the average score for training in Q2 2024 was 4.67, exceeding the Top 25 Corporate University target of 4.58. PG&E Academy's curriculum development teams regularly review survey scores and student comments, then incorporate improvements into the curriculum during the training's next maintenance cycle. The examples below show feedback and survey results provided by students in Q2 2024. The curriculum teams use this information to understand what is working well and what improvements need to be made.

Level 2 – All formal training includes Level 2 training effectiveness measures to gauge participant learning. Effectiveness strategies include knowledge and skill checks/assessments with various remediation strategies based on the safety risks associated with the tasks covered in the training. Level 2 assessment results from Q2 2024 include:

i.   ELEC-0981: Grounding Refresher GC/T-Line:

1. Average Knowledge Assessment Score = 93%

2. Average Skill Assessment Score for Mid-Span Work, Wire Down, and Repairing a Jumper = 98%

ii.   ELEC-0982: Grounding Refresher – Distribution:

1. Average Knowledge Assessment Score = 92%

2. Average Skill Assessment Score for Grounding a 21KV Riser = 98%

3. Average Skill Assessment Score for Wire Down and Replacing a Jumper = 99%

iii.   ELEC-0522: Gas for Electric

1. Average Knowledge Assessment Score = 95%

Level 3 – Selected courses include Level 3 training effectiveness measures to evaluate transfer of learning at least 60 days post-training through surveys, focus groups, knowledge testing, or observation of skills. A recent example includes Level 3 surveys sent to electric operations employees who completed the rubber glove refresher training. These surveys are intended to measure whether an employee is applying the knowledge and skills from the training into their work.

Level 4 – Selected courses evaluate how training impacts business metrics compared to baseline metrics. Additionally, the curriculum development process includes piloting a course before it is fully implemented. Curriculum teams engage with course participants during and after the pilot for feedback, then incorporate improvements into the final version of the training. Post-pilot updates to the confined space hands-on training for power generation employees during Q2 2024 illustrate how the curriculum team updated training based on direct feedback during the course pilot. The curriculum team:

- o Added scenarios to represent fossil and hydro work groups.

- o Provided clarity within the curriculum around non-entry rescue based on confusion among students during the pilot.

- o Updated the field scenarios in the training to allow for more general rescue situations.

- o Added more instructions focusing on the practice of air monitoring during field scenarios.

- Pursuant to recommendation #4,

  - o As of July 1, 2024, Corporate Security developed a new Workplace Violence Plan that is now a company standard (SEC-2003S), as well as a Workplace Violence Prevention training video (CORP-7500WBT) which 98% of the company has completed, and a violent incident log that is available to the entire company.

  - o In addition, a workplace violence prevention audit of 225 facilities was completed to ensure the company is in compliance with CA state law in accordance with SB 553.

  - o Corporate Security was also approved to hire three more Investigator positions dedicated to the field security of Vegetation Management and other Electric Compliance teams. The recruiting process will begin by August and the three additional positions should be in the field before the end of Q4 2024.

o Corporate Security has delivered LiveSafe Training to 61% of the 5,000 employees identified to receive the training. They also have delivered de-escalation training and Virtual Reality training to 90% of the gas crew at the Oakport yard and Field Safety Training, including de-escalation, to 40% of the employees who work in the field.

On May 19, 2023, the CPUC issued Decision (D.) 23-05-009 closing the Safety Order Instituting Investigation (I.) 15-08-019. D.23-05-009 adopted a modified Safety Policy Division (SPD) Staff Report which provided a plan for monitoring 13 recommendations that remained open for further monitoring. D.23-05-009 required PG&E to submit bi-annual Advice Letters responding to data requests, until the remaining recommendations are marked complete by SPD. On June 4, 2024, the SPD issued a disposition letter acknowledging the successful implementation of all outstanding recommendations, concluding PG&E's requirement to file bi-annual Advice Letters. Going forward, PG&E will no longer provide any information on the Safety OII proceeding in these quarterly updates as that proceeding is closed.

PG&E remains dedicated to continually improving our safety culture and will continue to provide further information on our progress each quarter.

Board of Directors' Safety and Nuclear Oversight Committee – Q2 2024 Update

The PG&E Board of Directors' Safety and Nuclear Oversight (SNO) Committee is an important part of our Board-level oversight of safety, enterprise risk, and other matters. A SNO Committee also concurrently exists at the PG&E Corporation Board (collectively referred to as the SNO Committees).

This section describes the oversight activities of the SNO Committees and is organized as follows:

1) Safety Topics Covered in SNO Committees' Meetings; and

2) Recommendations of the SNO Committees and Management Implementation.

Safety Topics Covered in SNO Committee Meetings

During the second quarter, the SNO Committees held both a joint meeting with the Audit Committees and a stand-alone meeting on May 14, 2024.

During the May joint meeting, the SNO and Audit Committees reviewed the Ethics and Compliance program, the 2024 Risk Assessment and Mitigation Phase (RAMP) filing, and the Enterprise and Operational Risk Management program.

During the May stand-alone meeting, the SNO Committees received an update on PG&E's Safety Excellence Management System, the Wildfire Safety Culture Assessment, and on both cyber and corporate security. The Committees also reviewed

safety performance, including nuclear safety. The Committees discussed risks associated with emergency preparedness and response, gas loss of containment, and data, records, and information management. Lastly, the Committees received an update on PG&E's downed conductor detection and partial voltage force out programs.

Recommendations of Boards of Directors' Safety Committee Meetings During Q2 2024

There is an ongoing dialogue between the Chair of the SNO Committees (which includes feedback of the Committees' members) and management, with frequent engagement around the implementation of the workforce safety strategy, safety performance updates, and corrective actions in the normal course of business. In addition, the SNO Committees made the following specific, safety-related recommendations to management during the second quarter of 2024:

- Many organizations do not have a consistent definition of essential functions. Therefore, a recommendation was made to consider running business continuity exercises so that responders are familiar with the rank of priorities of essential functions and will be well-practiced and ready to respond in an actual event; and

- A recommendation was made to consider using drones for situations beyond the visual line of sight while performing gas leak detection surveys.

Management Implementation of Recommendations Described in Q2 2024 Quarterly Notification

The following summarizes actions that management has taken to implement guidance and direction from the SNO Committees that was described in our Quarterly Notification for the first quarter of 2024.

Recommendation # 1: Expand the existing contractor safety quality assurance process to include new contractors during the contractor selection process, in addition to the current application for existing contractors.

Management's response: A new procedure for the Contractor Safety Quality Assurance Review (CSQAR) was drafted and is being circulated for leadership approval with a focus on "new in business" and "new to PG&E" contractors. The Contractor Safety team will be prepared August 1, 2024, to conduct a CSQAR on the first set of contractors that meet the expanded scope.

Recommendation # 2: Evaluate the use of drones with hazard detection and avoidance capabilities for terrain and other obstructions.

Management's response: Currently, we utilize Skydio and DJI drones, both equipped with 360-degree collision avoidance systems. These systems effectively detect and avoid terrain and objects larger than half an inch in diameter that are non-metallic. We

are in active collaboration with the hardware manufacturers to enhance these capabilities further. One promising area the manufacturers are exploring is the integration of thermal sensors, which would significantly improve the detection of metallic objects.

It is important to note that the drones we utilize are the best available in the market today. With over 140,000 flights conducted so far this year, our collision rate stands at 00.015%. This statistic shows the effectiveness and reliability of our current systems.

We are committed to continuous improvement and innovation to ensure the highest levels of safety and efficiency in our drone operations. We will continue to explore all available technologies to enhance our capabilities further.

Recommendation # 3: Share learnings from industry cyber incidents with the SNO Committees and how the learnings will be applied at PG&E.

Management's response: Cybersecurity management shared with SNO Committee members details of three industry cyber incidents and associated PG&E learnings and actions. The three incidents were the MOVEit Zero Day Vulnerability, Volt Typhoon attacks on ERCOT and Hawaii Electric, and the Colonial Pipeline cyber incident.

Conclusion

We appreciate the opportunity to provide these updates on our progress implementing our WMP, the latest Safety Culture Assessment, and the SNO Committees' recommendations from the previous quarter. If there are any questions, please feel free to contact Wade Greenacre at wade.greenacre@pge.com.

Sincerely,

_____/S/_____
Meredith Allen
Vice President, Regulatory Affairs

Appendix 1 - 2024 WMP Initiative Commitments

cc: Service Lists I.19-09-016 and I.15-08-019

August 1, 2024

APPENDIX 1: 2024 WMP Initiative Commitments

Plan Area	2024 WMP Commitments[6]			
A. Situational Awareness and Forecasting	SA-02 - Line Sensor - Installations	SA-10 - Distribution Fault Anticipation (DFA) Installations	SA-11 - Early Fault Detection (EFD) Installations	
B. Grid Design, Operations and Maintenance	AI-02 - Detailed Inspection Transmission – Ground	AI-04 - Detailed Inspection Transmission – Aerial	AI-05 - Detailed Inspection Transmission – Climbing	AI-06 - Perform transmission infrared inspections
	AI-07 - Detailed Ground Inspections - Distribution	AI-08 - Supplemental Inspections - Substation Distribution	AI-09 - Supplemental Inspections - Substation Transmission	AI-10 - Supplemental Inspections - Hydroelectric Substations and Powerhouses
	GH-01 - System Hardening - Distribution	GH-02 - Evaluate Covered Conductor Effectiveness	GH-04 - 10K Undergrounding	GH-06 - System Hardening - Transmission Shunt Splices
	GH-09 - Distribution Line Motor Switch Operator (MSO) - Replacements	GH-10 - Non-Exempt Expulsion Fuse - Removal		
	GM-01 - Asset Inspections - Quality Assurance	GM-03 – Eliminate HFTD-HFRA Distribution Backlog	GM-06 - EPSS - Down Conductor Detection (DCD)	GM-07 – Updates on EPSS Reliability Study
	GM-09 – Asset Inspection-Quality Control			

---

[6] Status color: Blue = "Completed on Time" - pending validation; Green = "On Track" – meets target; Amber = "At Risk" - not on track to meet target but has a catch back plan; Red = "Off Track / Missed" – not meeting target and does not have a catch back plan; Gray = Initiative has not started yet.

Plan Area	2024 WMP Commitments – Continued			
C. Vegetation Management and Inspection	VM-01 - LiDAR Data Collection - Transmission	VM-02 - Pole Clearing Program	VM-03 - Focused Tree Inspection Program	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	VM-08 - Vegetation Management – Quality Verification
	VM-13 - Routine Ground - Transmission	VM-14 - Transmission Second Patrol	VM-15 - Integrated Vegetation Management - Transmission	VM-16 - Distribution Routine Patrol
	VM-17 - Distribution Second Patrol	VM-18 – VM for Operational Mitigations (VMOM)	VM-19 – One VM Application Record Keeping Enhancement (Routine, Second Petrol)	VM-20 – Record Keeping Enhancement (VMOM
	VM-21 - FTI Record Keeping Enhancement	VM-22 - Vegetation Management – Quality Control		
D. Public Safety Power Shut off	PS-06 - Provide batteries to PG&E customers	PS-07 - PSPS Customer Impact Reduction	PS-11 – Pilot using drones for PSPS restoration	
E. Emergency Preparedness Plan	EP-01 - Complete PSPS and Wildfire Tabletop and Functional Exercises	EP-06 - Review, and revise the CERP and 2 Wildfire Related Annexes on a yearly basis		
F. Community Outreach and Engagement	CO-01 - Community Engagement – Meetings	CO-02 - Community Engagement - Surveys		