



**Pacific Gas and  
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August 26, 2024

Sheryl Bilbrey  
Program Manager, Environmental Science Division  
Office of Energy Infrastructure Safety  
California Natural Resource Agency  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

Re: PG&E 2022 Substantial Vegetation Management Audit Corrective Action Plan  
Docket: Electrical: Compliance Enforcement / 2022-SVM

Dear Program Manager Bilbrey:

This letter is in response to the Office of Energy Infrastructure Safety's (Energy Safety) 2022 Substantial Vegetation Management Audit (2022 SVM Audit) for Pacific Gas and Electric Company (PG&E), issued on July 26, 2024. The audit evaluated "vegetation management quantitative commitments (e.g., number of inspections completed) and verifiable statements (e.g., training of personnel)" in PG&E's 2022 Wildfire Mitigation Plan (WMP) Update to determine "whether PG&E completed the required work" for each of those commitments and statements.<sup>1</sup> In its audit, Energy Safety found that PG&E did not provide information consistent with the completion of all targeted work for 15 of 21 initiatives in the 2022 WMP Update.<sup>2</sup>

Energy Safety concluded that PG&E demonstrated compliance with 44 out of the 57 (or 77% of) VM commitments / verifiable statements in our 2022 WMP Update. Additionally, Energy Safety identified 13 instances where we did not provide information consistent with the completion of all targeted work. We appreciate the opportunity to provide our response. Below, please find PG&E's corrective action plan response on the identified 13 findings.

<sup>1</sup> Energy Safety's 2022 Substantial Vegetation Management Audit Report at 2.

<sup>2</sup> *Id.* at 1.

We note that in a number of instances, the supporting documentation originally provided in response to Energy Safety data requests was not sufficient. To limit this from happening in the future we will continue to work closely with Energy Safety staff to ensure alignment with the intent of each data request. Our goal will continue to be to provide sufficient information as requested, so that we can be fully responsive. In response to the SVM Audit Report, evidence of documentation to support completion of 2022 WMP Update vegetation management initiatives is provided in this letter.

Please do not hesitate to contact the undersigned at [Vincent.Tanguay@pge.com](mailto:Vincent.Tanguay@pge.com) should you have any questions regarding this response.

Sincerely,

Vincent Tanguay,  
Sr. Director, Regulatory Compliance, Electric  
Engineering, Planning, and Strategy

Cc: MaryBeth Farley, Energy Safety  
[compliance@EnergySafety.ca.gov](mailto:compliance@EnergySafety.ca.gov)  
Forest Kaser, CPUC  
Leslie Palmer, CPUC  
[REDACTED], PG&E  
[REDACTED], PG&E  
[REDACTED] PG&E  
Electric Data Requests, PG&E

## Corrective Action Plan Response

Energy Safety requested that PG&E submit a corrective action plan response to the 13 statement findings. For each item, we provide the 2022 Vegetation Management Initiative, Energy Safety’s finding, the corrective action, and our response.

<b>2022 Vegetation Management Initiative</b>	<b>7.3.5.1 Additional Efforts to Manage Community and Environmental Impacts</b>
<b>Statement 3 Finding:</b>	PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.1: Additional Efforts to Manage Community and Environmental Impacts. PG&E must supply a corrective action response addressing the findings identified.
<b>Statement 3</b>	“PG&E plans to continue customer outreach across EVM and Routine programs through multiple touchpoints and continued advance notifications including prior to inspections, during tree work, and after post tree work. PG&E expects to extend our planning and customer outreach approach across all VM programs, where applicable.”
<b>Corrective Action(s):</b>	PG&E must supply a corrective action response addressing the findings identified in statement 3.

### **Response to Statement 3:**

PG&E respectfully disagrees with the finding that we did not provide information consistent with the completion of all work identified in Initiative 7.3.5.1. As stated in the initiative, PG&E extended our planning and customer outreach approach across all VM programs where applicable, including all programs on the One VM tool in 2022. The One VM platform allows local operational teams to forecast start dates of each of the key activities by project, which facilitates PG&E’s ability to perform automated outreach ahead of those activities. In addition, users can capture individual outreach attempts at the parcel level for improved record keeping. PG&E continues to extend our annual planning and customer outreach approach across the board as we continue to integrate additional programs into One VM, and has already successfully applied this approach for our routine distribution work. Please see below for details on how we are currently leveraging our One VM database for proactive customer outreach on VM programs, where applicable.

In 2024, Vegetation Management, partnering with the Customer Outreach team, is executing proactive customer notifications for the Annual Distribution, Second Patrol (both as of April 2023), and Vegetation Control (as of June 2024) programs on a weekly basis. The notifications are triggered by the One VM Forecast Start Dates for key phases or activities of each of these programs and are delivered between two (2) and five (5) business days prior to the forecast start of the project. The following phases or activities each receive separate notifications:

- Annual Distribution
  - Pre-Inspection Activity
  - Tree Trimming Activity
- Second Patrol
  - Pre-Inspection Activity

- Tree Trimming Activity
- Vegetation Control
  - Initial Clear Phase
  - Warranty Phase
  - Re-clear Phase

As of July 2024, all major VM Distribution programs with exception of Tree Removal Inventory have been integrated into One VM, which will facilitate additional customer outreach on future work. Additionally, as of May 2024, Vegetation Management conducts post-tree work customer surveys aimed at assessing the effectiveness of the customer notification initiatives.

<b>2022 Vegetation Management Initiative</b>	<b>7.3.5.2 Detailed Inspections and Management Practices or Vegetation Clearances around Distribution Electrical Lines and Equipment</b>
<b>Statement 7 Finding:</b>	PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.2: Detailed Inspections of Vegetation Around Distribution Electric Lines and Equipment. PG&E must supply a corrective action response addressing the findings identified.
<b>Statement 7</b>	“The VM Tree Mortality Patrol program performs scheduled Tree Mortality patrols approximately six months before or after the routine patrol on overhead primary and secondary distribution facilities, primarily within HFTD and SRAs/Federal Responsibility Areas (FRA) to maintain radial clearance between vegetation and conductors by identifying trees that will encroach within the MDRs required by law and/or PG&E procedures and by identifying dead, dying and declining trees that are expected to fail and strike conductors. PG&E has implemented a Tree Mortality Maintenance plan that commits to completing the identified work within 180 days for HFTD areas and within 365 days for non-HFTD areas.”
<b>Corrective Action(s):</b>	PG&E must supply a corrective action response addressing the findings identified in statement 7.

**Response to Statement 7:**

PG&E agrees with the finding that not all identified work under the Tree Mortality Patrol was conducted within 180 days for HFTD or 365 days for non-HFTD. However, as PG&E explained in initiative 7.3.5.2, “PG&E may be constrained by environmental delays, customer refusals or noncontacts, permitting delays/restrictions or operational holds, weather conditions, active wildfire, and accessibility of the area where distribution system inspections have been identified.” Please see attachment ‘*DRU14062\_Statement 7\_Atch01\_Project year 2022 2nd Patrol Tree Records.xlsx*’ for additional insight as follows.

Please note: Under the Tree Mortality Patrol initiative, only dead and dying trees are prioritized for work

within 180 or 365 days based on location. The trees marked as “Pending” in your prior data were not all dead or dying. Please see the “Tree Record Data” tab of the attachment, and filter Column E “dtInspDate” to 2022 and Column L “bDeadOrDying” to ‘TRUE’ to identify dead and dying trees for 2022.

- Out of the 8,585 trees in HFTD worked more than 180 days after inspection, 7,529 of those were dead or dying, refer to our prior response to Energy Safety DR-223 data request “*DRU13344\_Q09\_Atch01\_Project\_year\_2022\_2nd\_Patrol\_Tree\_Records[1].xlsx*” Column E “dtInspDate” to 2022, Column K “HFTD or Non-HFTD” to HFTD, Column P “Tree Worked” unselect “Pending”, Column Q “PI\_qty” the quantity of trees are 8,585, Column L “bDeadOrDying” to “TRUE.” These 7,529 trees were worked later than 180 days following inspection due to a constraint that was later cleared, as shown in Column N “Constraint Type.”
- In the updated Dead and Dying tree records attachment (‘*DRU14062\_Statement\_7\_Atch01\_Project\_year\_2022\_2nd\_Patrol\_Tree\_Records.xlsx*’), out of the 1,583 trees in HFTD with no mitigation date marked as “Pending”, 1,447 trees were dead or dying (see Column Q ‘PI\_qty’). Of the 1,447 dead/dying trees:
  - 128 trees were later worked, as shown by Column S “Updated Work Date.” These trees were worked later than 180 days following inspection due to a constraint that was later cleared, as shown by Column U “Updated ITS Constraint”, Column N “Constraint Type”, and Column R “Updated Notification.”
  - 374 trees no longer require work. See Column R “Updated Notification” type ‘N.’ Prescriptions may be later marked as not needed if our crews learn that work was completed by another program or upon closer inspection (previously impossible due to constraints) the prescription was deemed unnecessary, for example.
  - 933 trees are still marked as constrained, per Column U “Updated ITS Constraint” Column N “Constraint Type” and Column R “Updated Notification” (‘Updated Notification’ types R ‘Refusal’, C ‘Contact’, O ‘Okay’, and Q ‘Quarantine’ indicate constraints). PG&E is continuing to work on resolving these constraints and will complete the work as soon as possible.
  - 12 trees are lacking data in the attached spreadsheet. PG&E will continue to research what constraints may exist and how to resolve them.
- Out of the 182 trees in Non-HFTD worked more than 365 days after inspection, 161 of those were dead or dying, refer to our prior response to Energy Safety DR-223 data request “*DRU13344\_Q09\_Atch01\_Project\_year\_2022\_2nd\_Patrol\_Tree\_Records[1].xlsx*” Column E “dtInspDate” to 2022, Column K “HFTD or Non-HFTD” to Non-HFTD, Column P “Tree Worked” unselect “Pending”, Column Q “PI\_qty” the quantity of trees are 182, Column L “bDeadOrDying” to “TRUE.” These 161 trees were worked later than 365 days following inspection due to a constraint that was later cleared, as shown in Column N “Constraint Type.”
- In the updated Dead and Dying tree records attachment (‘*DRU14062\_Statement\_7\_Atch01\_Project\_year\_2022\_2nd\_Patrol\_Tree\_Records.xlsx*’), out of the 303 trees in Non-HFTD with no mitigation date marked as “Pending”, 268 trees were dead or dying (see Column Q ‘PI\_qty’). Of the 268 dead/dying trees:
  - 50 trees were later worked, as shown by Column S “Updated Work Date.” These trees were worked later than 365 days following inspection due to a constraint that was later

cleared, as shown by Column U “Updated ITS Constraint”, Column N “Constraint Type”, and Column R “Updated Notification.”

- 111 trees no longer require work. See Column R “Updated Notification” type “N.” Prescriptions may be later marked as not needed if our crews learn that work was completed by another program or upon closer inspection (previously impossible due to constraints) the prescription was deemed unnecessary, for example.
- 107 trees are still marked as constrained, per Column U “Updated ITS Constraint”, Column N “Constraint Type”, and Column R “Updated Notification” (‘Updated Notification’ types R ‘Refusal’, C ‘Contact’, O ‘Okay’, and Q ‘Quarantine’ indicate constraints). PG&E is continuing to work on resolving these constraints and will complete the work as soon as possible.

To ensure visibility and tracking towards these timelines, a metric for dead and dying trees was incorporated into Vegetation Management’s Daily Operating Review (DOR) meetings. These DORs occur at senior leadership levels to maintain visibility of priorities and align on daily outcomes.

To support these operating reviews, a Power BI dashboard was created that is updated daily to sync with our VM systems of record. The Power BI is available to all VM team members. It was developed in 2022 to provide local VM teams with both a visual and line-item detail on all Dead and Dying trees identified with the calculated due date as outlined above. Please see attachment ‘*DRU14062\_Statement 7\_Arch02\_Dead and dying trees screenshot.pdf*’ for a screenshot example of the ‘Tree Mortality Timeliness PowerBI’ DOR view.

<b>2022 Vegetation Management Initiative</b>	<b>7.3.5.2 Detailed Inspections and Management Practices or Vegetation Clearances around Distribution Electrical Lines and Equipment</b>
<b>Statement 8 Finding:</b>	PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.2: Detailed Inspections of Vegetation Around Distribution Electric Lines and Equipment. PG&E must supply a corrective action response addressing the findings identified.
<b>Statement 8</b>	“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. 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.”
<b>Corrective Action(s):</b>	PG&E must supply a corrective action response addressing the findings identified in statement 8.

**Response to Statement 8:**

PG&E disagrees with the finding that we did not provide an updated baseline pole population as of October 1,

2021. PG&E established a baseline population of poles for 2022 work using a combination of a data pull from April 2022 and the cumulative inspections records from October 1, 2021, through April 4, 2022. Our response to Energy Safety DR-235 data request file provided “*DRU13713\_Q007\_Atch01\_E.02 Pole Clearing\_Redacted.xlsx*” captures the E.02 poles for the 2022 WMP Update.

Also, as stated in our prior response, PG&E did not discover any assets for pole clearing after August 31, 2022, therefore, there would not have been any assets to inspect and/or clear after that date for the 2022 workplan.

We have since transitioned our Vegetation Control (VC) Pole Clearing program from the legacy database into our One VM platform. In the previous (PCD2) platform, the non-PRC 4292 poles did not have their own designation. The move into One VM allows us to better track the number of poles in our database that are inspected and cleared as a part of our Pole Clearing program since there are certain checks incorporated into the platform, such as the “Compliance vs Risk Reduction” question that allows the field user to list a pole as either Compliance (subject to PRC 4292) or Risk Reduction (non-PRC 4292) and it will show up in the data as such.

<b>2022 Vegetation Management Initiative</b>	<b>7.3.5.3 Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electric Lines and Equipment</b>
<b>Statement 16 Finding:</b>	PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.3: Detailed Inspections of Vegetation Around Transmission Electric Lines and Equipment. PG&E must supply a corrective action response addressing the findings identified.
<b>Statement 16</b>	“The [integrated vegetation management] IVM Program is an ongoing maintenance program designed to maintain cleared rights-of-way in a sustainable and compatible condition by eliminating tall-growing and fire-prone vegetation and promoting low-growing, compatible vegetation. Prioritization is based on aging of work cycles and evaluation of vegetation re-growth. After initial work is performed, the rights-of-ways are reassessed every two to five years.” PG&E continues, “PG&E currently plans to perform approximately 9,000 acres [related to the IVM program].”
<b>Corrective Action(s):</b>	PG&E must supply a corrective action response addressing the findings identified in statement 16.

**Response to Statement 16:**

PG&E agrees with the finding that the unit of measure was incorrectly written as ‘trees completed’ in the project status summary report. The IVM/Fee program consists of project set up management (onsite support and program oversight) and from those assessments tree/brush work and managing weeds and hazardous vegetation is assigned to tree contractors. This program is planned by acres per project set, which is the unit per measure.

PG&E agrees with the finding that we completed 4,979 of 9,000 acres or 55% of our Integrated

Vegetation Management (IVM) target in 2022. At the time, PG&E prioritized vegetation work on the distribution system as higher priority vegetation work, carrying over some IVM work into later years. PG&E’s guidance was informal at the time, and since then we have formalized the process to prioritize TIVM based on aging work cycles and evaluation of vegetation regrowth.

Additionally, PG&E agrees with the finding that we did not provide documentation showing the process and how we prioritize this work. Please see attachment ‘*DRU14062\_Statement 16\_Atch01\_TD-7111S ROWX and TIVM Standard\_CONF.pdf*’ Revision 1 published on 02/20/2024 for updated language in Section 3 ‘Roles and Responsibilities’ that identifies Vegetation Asset Strategy & Analytics (VASA) as the team responsible for creating the scope of work in collaboration with VM Operation personnel. Please also see Section 6.2 of the attachment, which documents that the prioritization of Transmission Integrated Vegetation Management (TIVM) is based on aging work cycles and evaluation of vegetation regrowth rates.

<b>2022 Vegetation Management Initiative</b>	7.3.5.4 Emergency Response Vegetation Management due to Red Flag Warning or Other Urgent Climate Conditions
<b>Statement 20 Finding:</b>	PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.4: Emergency Response Vegetation Management Due to Red Flag Warning or Other Urgent Conditions. PG&E must supply a corrective action response addressing the findings identified.
<b>Statement 20</b>	“All trees identified for work by pre-inspectors are evaluated for the priority of the required tree work. If vegetation is determined to be an immediate risk to PG&E facilities, described as a Priority 1 Condition in the VM Priority Tag Procedure (TD-7102P-17), the condition will be mitigated within 24 hours of identification as long as conditions are safe for the tree crew to proceed with work. Vegetation identified as pending Priority 2 work within the Red Flag Warning (RFW) area will be reviewed and re-prioritized if determined necessary by the local PG&E VM Point of Contact.”
<b>Corrective Action(s):</b>	PG&E must supply a corrective action response addressing the findings identified in statement 20.

**Response to Statement 20:**

The finding requests explanations regarding 24 P1 trees that did not appear to have been addressed within 24 hours of identification and asks whether the P1 and P2 trees marked with a “NULL” remediation date were remediated within their respective compliance periods. The finding also points out that 102 trees had work dates that were prior to inspection dates, and requests that PG&E document our procedures in place to prevent that from occurring in the future.

Regarding the 24 P1 trees that did not show remediation within 24 hours:

- Tree Id -1062595312 in the original spreadsheet was originally identified on 2/22/22 under an incorrect address and then relisted by the correct address (next door). The corrected tag was both generated and worked on 2/22/2022.
- Tree Id -1059069591 (a locust) in the original spreadsheet was a duplicate tag.



- Tree Id -1060039847 in the original spreadsheet was identified on 7/11/2022 and completed on 7/11/2022. The pre-Inspector at the time created the P1 record on an old Routine record that had an original inspection date of 2/25/2022 instead of creating it on a new off-cycle record as they should have.
- 21 trees are lacking data. PG&E will continue to research the cause of delay.

Regarding the 157 P1 and P2 trees that showed a remediation date of “NULL,” please see attachment ‘DRUI4062\_Statement 20\_Atch01\_P1 and P2 Data\_Update\_Redacted.xlsx’ for updated information as follows:

- 17 trees were worked on alternate work requests and the original tag was closed. See tab “Data”, Column AA “Category.”
- 95 trees are delayed due to an active constraint present. See tab “Data.” The constraint details are located in Column Z “Combined Comments” and Column AA “Category.”
- 45 trees were denoted as work no longer required. See tab “Data” Column AA “Category.”
- Please note, we have broken out the P1/P2 trees by county. There are duplicate ‘Tree\_ID’ numbers in Column A due to some trees having multiple constraints.

Regarding the 102 trees that showed work dates prior to inspection dates, this occurs in situations where a hazardous tree is identified and immediately mitigated in the field before the tree is input into our system of record. The date on a record is captured when the record is created and cannot be backdated. At this time, PG&E cannot provide any documentation of procedures to ensure remediation dates are recorded after inspection dates going forward. There will still be cases in which a work date may precede the inspection date in our system of record going forward, in those instances the tree is immediately mitigated in the field before the record is created. PG&E will investigate opportunities to better align inspection and remediation dates in our systems of record.

2022 Vegetation Management Initiative	7.3.5.6 Improvement of Inspections
<b>Statement 26 Finding:</b>	PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.6: Improvement of Inspections. PG&E must supply a corrective action response addressing the findings identified.
<b>Statement 26</b>	“All SVMI will have to successfully complete the introduction to Pre-Inspection courses in the SLP. While progressing through the PI track in the SLP, the SVMI will have scheduled check-ins with a supervisor to ensure they have fully absorbed the material that is being taught. The SVMI is also expected to complete trainings around record and information management, and Security and Privacy Awareness. There will be a series of four audits at the 1-month, 3-month, 6-month, and 1 year mark to evaluate the work that is being completed by the SVMI once they finish all their courses.” PG&E goes on to state that “SVMI must also complete the SVMI SLP trainings, which consist of approximately 40 courses focused on the process, protocols, and procedures... The supervisor has a hard copy check list that they utilize to keep track of the progress being made by the SVMI as they complete the SVMI courses.”

<b>Corrective Action(s):</b>	PG&E must supply a corrective action response addressing the findings identified in statement 26.
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**Response to Statement 26:**

PG&E agrees with the finding. Previously, our Vegetation Management Structured Learning Path (SLP) trainings required manual assignment, tracking and oversight by supervisors, which made it possible to lose track of whether trainings were assigned and completed and whether post-training audits were conducted. To reduce this risk, in 2024, PG&E shifted the process of tracking trainings manually and conducting post-training audits to a new system of profiling trainings within the PG&E MyLearning system, which is part of the PG&E Academy.

With profiled trainings, users are automatically assigned trainings based on their roles. Once trainings are profiled, users will have a defined time to take and complete the course. With this system, users are also sent reminders to complete their profiled trainings on time. Confirmation of completed trainings can be easily conducted through this new profiled trainings system. And the quality of the work conducted is confirmed through PG&E's Quality Control and Quality Assurance programs.

Please see attachment 'DRUI4062\_Statement 26\_Atch01\_Training Records\_CONF.xlsx' for the training records profiled for the 6 individuals referenced in the ask. The records show that they are up to date for the trainings required for their current roles. Please note, if the due date is 12/31/9999, that means that the training is assigned a new course number annually.

<b>2022 Vegetation Management Initiative</b>	<b>7.3.5.13 Quality Assurance / Quality Control of Vegetation Management</b>																	
<b>Statement 33 Finding:</b>	PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.13 Quality Assurance / Quality Control of Vegetation Management. PG&E must supply a corrective action response addressing the findings identified.																	
<b>Statement 33</b>	<p>In its 2022 WMP, PG&amp;E provided tables describing the following QA and QV audit targets:</p> <p>Quality Assurance Audits:</p> <table border="1"> <thead> <tr> <th>Type of Audits</th> <th># of Audits</th> <th>AQL</th> </tr> </thead> <tbody> <tr> <td>Distribution - voltages less than 60kV in our Routine, Tree Mortality, EVM and Pole Clearing programs.</td> <td>43</td> <td>95%</td> </tr> <tr> <td>Vegetation Pole Clearing</td> <td>1</td> <td>95%</td> </tr> <tr> <td>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</td> <td>1</td> <td>95%</td> </tr> <tr> <td>Procedure audit of the following: Enhanced Vegetation Management, Record Keeping, Transmission and Distribution Line Verification, and Refusal Procedure</td> <td>4</td> <td>95%</td> </tr> </tbody> </table>			Type of Audits	# of Audits	AQL	Distribution - voltages less than 60kV in our Routine, Tree Mortality, EVM and Pole Clearing programs.	43	95%	Vegetation Pole Clearing	1	95%	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	1	95%	Procedure audit of the following: Enhanced Vegetation Management, Record Keeping, Transmission and Distribution Line Verification, and Refusal Procedure	4	95%
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	<p>Distribution and transmission audits include multiple trees, and a 95 percent AQL would represent 95 percent of the total trees audited being in compliance with PG&amp;E requirements.</p> <p>The vegetation pole clearing audit includes multiple poles and a 95 percent AQL would represent 95 percent of the total poles audited being in compliance with PG&amp;E requirements.</p> <p>The procedure audit includes a review of PG&amp;E’s vegetation standards and whether PG&amp;E’s vegetation management team adhered to the process and procedures in the standard.</p> <p>Quality Verification Reviews:</p> <table border="1" data-bbox="589 627 1448 957"> <thead> <tr> <th>Type of Verification</th> <th>#</th> <th>AQL</th> </tr> </thead> <tbody> <tr> <td>Distribution - voltages less than 60kV in our Routine, Tree Mortality, EVM and Pole Clearing programs.</td> <td>1,522 Reviews<sup>(a)</sup></td> <td>95%</td> </tr> <tr> <td>Vegetation Pole Clearing</td> <td>3,421 Poles</td> <td>95%</td> </tr> <tr> <td>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</td> <td>260 Reviews</td> <td>95%</td> </tr> </tbody> </table> <p>Distribution and transmission reviews include multiple trees, and a 95 percent AQL would represent 95 percent of the total trees reviewed being in compliance with PG&amp;E requirements.</p> <p>The vegetation pole clearing reviews includes multiple poles and a 95 percent AQL would represent 95 percent of the total poles reviewed being in compliance with PG&amp;E requirements.</p>	Type of Verification	#	AQL	Distribution - voltages less than 60kV in our Routine, Tree Mortality, EVM and Pole Clearing programs.	1,522 Reviews <sup>(a)</sup>	95%	Vegetation Pole Clearing	3,421 Poles	95%	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	95%
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<b>Corrective Action(s):</b>	PG&E must supply a corrective action response addressing the findings identified in statement 33.												

**Response to Statement 33:**

PG&E agrees with the findings that we did not achieve the acceptable quality level for VM Distribution, Transmission, or Pole Clearing based on QV pass rates. In 2022, the AQL target for the QAVM Transmission & Distribution Line Verification Assessment audit was 95%. Our AQL score for the 2022 QAVM Transmission and Distribution Line Verification Assessment was 88%. This was scored based on the number of correctly documented transmission and distribution interface points.

In 2023, to formalize a quality management system around VM, PG&E implemented a Quality Control function for VM Distribution, Transmission and Pole Clearing, and the Quality Verification function was renamed Quality Assurance – Performance. In 2023, the pass rate performance of each of the three programs exceeded the 95% AQL. Please see attachments ‘*DRU14062\_Statement 33\_Atch01\_2023 MIDQM - WMP Commitment submission VM-08.pdf*’ and ‘*DRU14062\_Statement 33\_Atch02\_2023 VM-08 Power BI Dashboards Screen Snippet.pdf*’ for our QAVM Distribution, Transmission, and VC Pole Clearing results for 2023.

<b>2022 Vegetation Management Initiative</b>	<b>7.3.5.14 Recruiting and Training of Vegetation Management Personnel</b>
<b>Statement 37 Finding:</b>	PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.14: Recruiting and Training of Vegetation Management Personnel. PG&E must supply a corrective action response addressing the findings identified.
<b>Statement 37</b>	<p>“The One Veg Tool is our new software program that was developed to deliver a single tool that incorporates all vegetation management work into one. As of June 1, 2022, we had made available the following training regarding the One Veg Tool for PG&amp;E employees and contractors with a completion target for all employees and contractors of December 31, 2022.</p> <ul style="list-style-type: none"> <li>○ VEGM – 9101 – One VM for Veg Mgt Inspectors (VMI);</li> <li>○ VEGM – 9102 – One VM for Field Tree Crews;</li> <li>○ VEGM – 9103 – One VM for Field Tree Crews (Spanish version);</li> <li>○ VEGM – 9104 – One VM for Tree Crew back-office support; and</li> <li>○ VEGM – 9105 – One VM for Support Teams.”</li> </ul>
<b>Corrective Action(s):</b>	PG&E must supply a corrective action response addressing the findings identified in statement 37.

**Response to Statement 37:**

PG&E agrees with the finding that only a portion of the complete roster of employees and contractors in 2022 completed trainings regarding the One VM tool. The One VM trainings were made available to all VM personnel at that time. However, only the personnel who utilize the One VM database and application were required to complete the training. One VM trainings must be completed prior to access being granted to the One VM application and database. As the use of the tool increases, more employees and contractors complete trainings regarding the tool.

Please see response to Statement 26 above for additional details on our training profiling process to ensure that personnel complete all trainings required for their specific roles.

<b>2022 Vegetation Management Initiative</b>	<b>7.3.5.14 Recruiting and Training of Vegetation Management Personnel</b>
<b>Statement 39 Finding:</b>	PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.14: Recruiting and Training of Vegetation Management Personnel. PG&E must supply a corrective action response addressing the findings identified.

<b>Statement 39</b>	“We are expanding and improving our environmental courses for Field Crews and Tree Crews (VEGM-0301 and VEGM-0302). The updated training will be available for PG&E employees and contractors by December 31, 2022. These courses include expanded course curriculum to cover all Best Management Practices with field examples.”
<b>Corrective Action(s):</b>	PG&E must supply a corrective action response addressing the findings identified in statement 39.

**Response to Statement 39:**

PG&E disagrees with the finding that PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.14. Regarding our commitment to expand and improve our environmental field courses for Field Crews and Tree Crews, PG&E released an updated version of VEGM-0301 and worked on development of VEGM-0302. The VEGM-0302 course was officially updated to Version 1.01 on 7/1/2023. The updates made to course VEGM-0302 are listed below, and further information can be located on attachment ‘*DRU14062\_Statement 39\_Atch01\_VEGM-0302 Read Me\_CONF.pdf.*’

Changes made to VEGM-0302:

- Annual course maintenance.
- Removed references to ICA and replaced with LRA and Non-USFS FRA, HFTD and HFRA.
- Removed redundant content, updated pole numbers.
- Added content re: pesticide use and application.
- Changed ICA to Risk Reduction.
- Removed knowledge assessments from the WBT and created Question mark test.
- Updated images as needed.
- Created new knowledge assessments based on SME input.
- Changed Fuel and Topography ratings to new standard of Low and Elevated.
- Added slide on CCR-1255 Exemptions.
- Updated target assessment parameters.
- Replaced Overall Fire Rating grid for new version. Added slides for pre-module document review and assessment.

In 2022, our entire vegetation management training portfolio of courses was expanded and improved upon. The following courses were developed *and* released in 2022, which includes VEGM-0301WBT Veg Management Environmental Awareness:

- VEGM-0103WBT v2.1
- VEGM-0201WBT v1.0
- VEGM-0240WBT v1.0
- VEGM-0301WBT v2.0
- VEGM-0411WBT v1.0 – 1.2
- VEGM-0450WBT v2.0
- VEGM-0500ILT v3.0 – 3.2

- VEGM-0501WBT v1.0
- VEGM-9070RVL v1.0
- VEGM-9071RVL v1.0
- VEGM-9071WBT v1.0
- VEGM-9001WBT v1.0
- VEGM-9002WBT v1.1
- VEGM-9004WBT v1.0
- VEGM-9102WBT v1.0
- VEGM-9103WBT v1.0
- VEGM-9104WBT v1.0
- VEGM-9105WBT v1.0
- VEGM-9069RVL v1.0
- VEGM-9073RVL v1.0

<b>2022 Vegetation Management Initiative</b>	<b>7.3.5.17 Substation Inspections</b>
<b>Statement 45 Finding:</b>	PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.17: Substation Inspections. PG&E must supply a corrective action response addressing the findings identified.
<b>Statement 45</b>	“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.”
<b>Corrective Action(s):</b>	PG&E must supply a corrective action response addressing the findings identified in statements 45.

**Response to Statement 45:**

PG&E agrees with the finding that we did not state in our 2022 WMP Update that we intended to use procedure LAND-4001P-01 for substation inspections. 2022 Substation inspections were guided by Procedure LAND-4001P-01 (Substation Fire Hardening) published formally on January 26, 2022. Within this guidance document (Page 3) the inspection timeframe of November 15<sup>th</sup> of the prior year to May 31<sup>st</sup> of the current year is defined. This timeframe was selected to align with other VM initiatives with similar start dates at that time. All inspections were successfully completed within the timeframe outlined in LAND-4001P-01. For the cycle from November 15, 2021, through May 31, 2022, we inspected 68 (52%) distribution substations within the November 15, 2021, through December 30, 2021, timeframe and the remaining 64 (48%) distribution substations in 2022.

LAND-4001P-01 has since merged with LAND-5201P-01 (Electric Substation and Power Generation Powerhouses and Switchyard Defensible Space), and the inspection timeframe was amended to a calendar year format. Please see attachment ‘*DRUI4062\_Statements 45 & 47\_Atch01\_7.3.5.17\_LAND-5201P-01 rev3\_110923\_CONF.pdf*’ for the procedure published on November 9, 2023. Please see page 4, Section 1.2 for the update that our inspection timeframe has been shifted to start on January 1 of the

current year. This timeframe was implemented for all substation inspections performed to support the 2024 season.

<b>2022 Vegetation Management Initiative</b>	7.3.5.17 Substation Inspections
<b>Statement 47 Finding:</b>	PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.17: Substation Inspections. PG&E must supply a corrective action response addressing the findings identified.
<b>Statement 47</b>	“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.”
<b>Corrective Action(s):</b>	PG&E must supply a corrective action response addressing the findings identified in statement 47.

**Response to Statement 47:**

PG&E agrees with the finding that we did not state in our 2022 WMP Update that we intended to use procedure LAND-4001P-01 for substation inspections. 2022 Substation inspections were guided by Procedure LAND-4001P-01 (Substation Fire Hardening) published formally on January 26, 2022. Within this guidance document (Page 3) the inspection timeframe of November 15<sup>th</sup> of the prior year to May 31<sup>st</sup> of the current year is defined. This timeframe was selected to align with other VM initiatives with similar start dates at that time. All inspections were successfully completed within the timeframe outlined in LAND-4001P-01. For the cycle from November 15, 2021, through May 31, 2022, we inspected 16 (29%) transmission substations within the November 19, 2021, through December 30, 2021, timeframe and the remaining 39 (71%) transmission substations in 2022.

LAND-4001P-01 has since merged with LAND-5201P-01 (Electric Substation and Power Generation Powerhouses and Switchyard Defensible Space), and the inspection timeframe was amended to a calendar year format. Please see the attachment referenced in the above response to Statement 45 for the updated procedure LAND-5201P-01 rev. 3 for the update that our inspection timeframe has been shifted to start on January 1 of the current year. This timeframe was implemented for all substation inspections performed to support the 2024 season.

<b>2022 Vegetation Management Initiative</b>	7.3.5.17 Substation Inspections
<b>Statement 49 Finding:</b>	PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.17: Substation Inspections. PG&E must supply a corrective action response addressing the findings identified.
<b>Statement 49</b>	“Power Generation Hydro Substations and Powerhouses located in HFTD and HFRA areas are inspected. Inspections are prioritized based on elevation and annual fuel growth in which lower elevations are inspected first as they have a higher rate of growth and dry out earlier in the season whereas higher elevations grow slower and later into the year.”
<b>Corrective Action(s):</b>	PG&E must supply a corrective action response addressing the findings identified in statement 49.

**Response to Statement 49:**

PG&E respectfully disagrees with the finding that we did not provide information consistent with the completion of all work identified in Initiative 7.3.5.17 regarding inspection prioritization. The original Excel file provided (Energy Safety DR-223 “*DRU13344\_Q113\_Atch01\_2022 Tracker for WMP.xlsx*”) showed inspection dates of each powerhouse and switchyard where defensible space work occurred. As previously stated, the earlier dates shown in the spreadsheet demonstrated the priority of each powerhouse and switchyard. For example, the earlier dates listed show a higher priority of that specific site which was based on elevation and associated annual vegetative growth at that facility.

To further illustrate our prioritization methods, please see attachment ‘*DRU14062\_Statement 49\_Atch01\_7.3.5.17\_2022 Tracker REV for WMP.xlsx*’ for a revised spreadsheet showing the 2022 list of Defensible Space (DS) inspections at Power Generation Hydro Substations. In the “Table” tab, we added a Column E ‘High or Low Elevation’ to show the elevation designation (High/Low) of each powerhouse location where DS inspections occur. Additionally, we added a Column F “Inspection Priority” to show the priority (1<sup>st</sup> or 2<sup>nd</sup>) with the 1<sup>st</sup> being low elevation sites (0-3, 000’) where seasonal vegetation grows earlier in the season and dries out quicker. The 2<sup>nd</sup> priority are the high elevation sites (3000’ and above) where vegetation grows later in the season. The priority designation referenced clearly coincides with the inspection dates in most cases for each facility and the associated elevation range.

<b>2022 Vegetation Management Initiative</b>	7.3.5.20 Vegetation Management to Achieve Clearances Around Electric Lines and Equipment
<b>Statement 55 Finding:</b>	PG&E did not provide information consistent with the completion of all work identified in Initiative 7.3.5.20: Additional Vegetation Management Practices Beyond Regulatory Requirements and Recommendations. PG&E must supply a corrective action response addressing the findings identified.
<b>Statement 55</b>	“Complete utility defensible space work on a minimum of 7,000 poles in the HFTD, barring External Factors.”
<b>Corrective Action(s):</b>	PG&E must supply a corrective action response addressing the findings identified in statement 55.

**Response to Statement 55:**



PG&E disagrees with the finding that PG&E failed to perform required work for Initiative 7.3.5.20. The purpose of the Utility Defensible Space (UDS) program is to modify fuels underneath and adjacent to overhead transmission and primary distribution. As a discretionary, non-regulatory-driven program, its scope is limited to treatments that minimize environmental impact and do not conflict with other resource protection regulations, in particular, California Forest Practice Rules. The UDS program is not a regulatory requirement.

In cases where customers preferred a more limited scope of work, that guidance was honored. Even a partial scope of work, however, often reduced grassy fuels in proximity to targeted assets, which is an improvement to otherwise untreated conditions. Dedication of time and resources to determine where UDS work could be completed in full, partially or determined as not necessary, all align with the commitment and should count towards completion goals.

For UDS poles marked 'Partial – Modified Clear' meaning any pole that couldn't be cleared to full UDS specifications, the causes of partial work were identified with one of the following options listed below and supported by photographs and reviewed with project lead. The determination was made by PG&E supervisors and leadership to report these poles as part of our completion count towards the target in alignment with the UDS program standard TD-7109S.

- Difficult Access
- Environmental Protection
- Erosion Precautions
- EVM Debris – Too Large
- Landowner Debris
- Landowner Refused
- Safety Issues
- Slope

The work completed to the UDS scope per the program standards, including partial clearing due to external factors, all resulted in modification of fuels as intended to reduce the potential for rapid fire spread near PG&E assets.