Pacific Gas and Electric Company®

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Via: Electronic Submission

Patrick Doherty
Program Manager, Compliance Assurance Division
Electrical Infrastructure Directorate
715 P Street, 20th Floor
Sacramento, California 95814

Re: Pacific Gas and Electric Company's Comments on Final Annual Report on Compliance for the 2021 Wildfire Mitigation Plan, Docket No. 2021-ARC

Dear Mr. Doherty

Pacific Gas and Electric Company is submitting these comments in response to the Final 2021 Annual Report on Compliance (ARC) issued by the Office of Energy Infrastructure Safety (Energy Safety) on September 5, 2024, regarding our compliance with the 2021 Wildfire Mitigation Plan (WMP).

Energy Safety concluded we "had mixed outcomes related to implementation of [the] 2021 WMP update."[1] However, we note this is a significant improvement from Energy Safety's 2020 WMP ARC, which found we "failed to substantially comply with [the] 2020 WMP."[2] We appreciate Energy Safety's acknowledgement of our efforts to execute and meet our objectives and initiatives for the 2021 WMP during the compliance period of January 1 - December 31, 2021.

We appreciate Energy Safety reviewing and approving our 2021 WMP and publishing the Final 2021 ARC. As such, we are providing our comments addressing the Final 2021 ARC.

Sincerely,

Vincent Tanguay,
Sr. Director, Electric Regulatory Compliance

[1] Energy Safety Final 2021 Annual Report on Compliance (Sep. 5, 2024) at 1.

[2] Energy Safety 2020 WMP Annual Report on Compliance (Feb. 2, 2023) at 1.

Pacific Gas and Electric Company's Comments on the Office of Energy Infrastructure Safety's Final Annual Report on Compliance for the 2021 Wildfire Mitigation Plan

September 19, 2024

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I. EXECUTIVE SUMMARY

In 2021, Pacific Gas and Electric Company (PG&E) undertook significant efforts to reduce its wildfire risk and achieved the substantial majority of its Wildfire Mitigation Plan (WMP) Update initiative targets.[1] We appreciate the work that the Office of Energy Infrastructure Safety (Energy Safety) undertook both in reviewing and approving our 2021 WMP and publishing the Final 2021 WMP Annual Report on Compliance (2021 ARC). Although Energy Safety concluded that PG&E "had mixed outcomes related to implementation of its 2021 WMP update,"[2] we note this is a significant improvement from Energy Safety's 2020 WMP ARC (2020 ARC) which found that PG&E "failed to substantially comply with its 2020 WMP."[3] Energy Safety made no such similar finding in the 2021 ARC. Thus, while we understand that there is still much work to be done, we are pleased that Energy Safety recognized PG&E's year-over-year improvements.

PG&E shares Energy Safety's goal to eliminate wildfire risk caused by electric utility facilities. In working toward this goal in the three years since the compliance period at issue, we note that most of the compliance issues cited in the 2021 ARC have already been addressed in subsequent WMPs and in our associated execution of wildfire-related work. We continue to diligently and transparently respond to, and incorporate, Energy Safety's findings and recommendations in subsequent filings and reports and will continue to innovate and seek breakthrough solutions to further evolve future WMPs.

II. COMPLIANCE STANDARDS CANNOT BE APPLIED RETROACTIVELY

It is unfair to retroactively apply subsequently created compliance standards to work that was performed under a different compliance standard. Commission Res. WSD-012, published on November 23, 2020, is the appropriate compliance standard to use for determining compliance with work performed from January 1, 2021, to December 31, 2021. In the 2021 ARC, Energy

[1] Energy Safety Final 2021 WMP Annual Report on Compliance (Sep. 5, 2024) at 1.

[2] Energy Safety 2021 WMP ARC (Sep. 5, 2024) at 1.

[3] Energy Safety 2020 WMP ARC (Feb. 2, 2023) at 1.

Safety applies the 2023 Compliance Guidelines to the work performed by PG&E in 2021.[4] This is inappropriate as work must be performed and evaluated in accordance with the guidelines in operation at the time. PG&E identified this very issue in its comments on the 2023 Draft Compliance Guidelines as well as in its comments on the 2024 Draft Compliance Guidelines.[5] PG&E also identified this issue in its comments on the Draft 2020 WMP ARC, where the 2022 Compliance Guidelines were applied to work performed in 2020.[6] Future ARCs should use the compliance standard in effect at the time of the compliance period.

Energy Safety determined findings related to PG&E's 2021 WMP objectives, data governance, and 2020 WMP targets/commitments, and initiatives that Energy Safety was unable to verify. Following, are PG&E's responses to those findings.

III. 2021 WMP Update Objectives

PG&E's specific objectives for its 2021 WMP Update year were as follows:

- Objective 1: Reduce wildfire ignition potential.
- Objective 2: Reduce wildfire spread through enhanced situational awareness.
- Objective 3: Reduce the impact of PSPS events.7

Energy Safety determined that PG&E failed to meet two of its 2021 WMP Update objectives: to reduce ignition potential and wildfire spread during the 2021 compliance period.[8] Energy Safety found that PG&E successfully completed one WMP initiative: reducing the impact of PSPS events.[9] Of these three findings, we disagree that we failed to meet Objective 1 by failing to reduce our wildfire ignition potential.

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[4] Energy Safety 2021 WMP ARC at 5.

[5] PG&E Comments on Energy Safety's Draft Compliance Guidelines (Jul. 10, 2023) at 5 ("Energy Safety Cannot Hold Utilities to a Retroactively Created Standard."); Joint IOUs Comments on Energy Safety's Proposed Compliance Guidelines 2024 Update (Jul 5, 2024) at 7 ("When these Draft Guidelines are finalized and published by Energy Safety, they should clarify that they do not apply retroactively to work performed prior to 2025. Work must be performed and evaluated in accordance with the guidelines in operation at the time.").

[6] PG&E Comments on Draft ARC for the 2020 WMP (Dec. 27, 2022) at 36-37.

[7] PG&E 2021 Revised WMP (Jun. 3, 2021) at 252.

[8] Energy Safety 2021 WMP ARC at 1.

[9] Energy Safety 2021 WMP ARC at 1.

Energy Safety finding: PG&E had a total count of 480 ignitions in 2021, which was a decrease from 512 ignitions in 2020 and lower than the average of 487 ignitions in the preceding six years. PG&E's normalized ignitions in 2021, however, increased compared to 2020 by approximately 66%. When analyzing the risk drivers of PG&E's normalized ignitions, Energy Safety observed increases in contact from vegetation ignitions as compared to PG&E's historical six-year average from 2015 through 2020. Energy Safety described the consequences of these ignitions as significant in 2021, resulting in the catastrophic Dixie Fire, the Mule Fire, and the Brewer Fire.

PG&E response: The count of weather normalized ignitions decreased between 2020 and 2021, not increased. Below is a table of all weather-normalized reportable ignitions (ignitions occurring in High Fire Threat Districts (HFTD) or High Fire Risk Areas (HFRA) where the Fire Potential Index value was R3 or above) by year from 2015 to 2023. The table also includes a count of those ignitions caused by vegetation. In 2021, PG&E observed 80 weather-normalized ignitions where 36 of those were caused by vegetation. This compares to 109 ignitions in 2020 with 39 of those caused by vegetation contact.

PG&E is committed to eliminating these ignitions during high-risk conditions and has made significant progress in this area since 2021. After the Dixie fire in 2021, PG&E implemented the Enhanced Powerline Safety Setting (EPSS) program and observed a significant reduction in ignitions in higher-risk conditions. This protection is currently deployed on all circuits within the High Fire Risk Area and is enabled daily where wildfire risk is elevated. In 2022, the EPSS program saw a 68% reduction in ignitions compared to the three-year average prior to the establishment of the program as a pilot in 2021. In 2023, the program saw a 72% effectiveness rate.

In 2022, PG&E observed 38 ignitions in R3+ conditions with 17 caused by vegetation. In 2023, PG&E observed 28 ignitions in R3+ conditions with 8 caused by vegetation.

Year	Total Weather-Normalized Reportable Ignitions	Subset Caused by Vegetation
2015	16	5
2016	34	34
2017	113	62
2018	96	42
2019	74	40
2020	109	39
2021	80	36
2022	38	17
2023	28	8

IV. PG&E Responses to Data Governance Challenges

Energy Safety identified the following challenges with PG&E's data governance and reporting during the 2021 WMP Update compliance period. We provide a response to each below.

Energy Safety finding: Energy Safety identified data governance and overall reporting issues in the 2021 WMP Update compliance period. Throughout the Quarterly Initiative Update (QIU), PG&E made numerous changes to initiative targets compared to those in the approved 2021 WMP Update.[10]

PG&E response: PG&E made changes to the defined WMP commitments in the QIU on a quarterly basis, as needed. This process has been refined with the development of the 2022 WMP and subsequent Annual Report on Compliance guidelines to clarify and define what an initiative is and what is required for the QIU.

Energy Safety finding: A clear example Energy Safety points toward is initiative 7.3.3.6, where PG&E set a target of 4,100 poles for reinforcement. In its quarterly reporting, PG&E

[10] Energy Safety 2021 WMP ARC (Sep. 5, 2024) at 32.

reaffirmed that it had identified "at least 4,100 poles for replacement" in 2021 but did not maintain fidelity to the target for this initiative.[11] Namely in PG&E's Q4 2021 QIU, we argued that because pole reinforcements are "demand-driven work" there is "always the possibility that the forecast will not be reached, without having mentioned we would need to adjust the target in the earlier quarters.[12]

PG&E response: PG&E notes that it surpassed the pole replacement target for this initiative. Due to confusion related to the changed guidelines from Energy Safety, PG&E was unaware this initiative should have been updated.

Energy Safety finding: Another example pertains to initiatives 7.3.3.12.1-1, 7.3.3.12.1-2, 7.3.3.12.2-1, and 7.3.3.12.2-2. These four initiatives related to animal abatement and enhanced inspections at distribution and transmission substations. In all four 2021 QIUs, at least one of these initiatives' targets was changed for various reasons.[13]

PG&E response: The planned target for these enhanced inspections of Distribution and Transmission Substations were revised based on a realignment of the annual inspection plan to list all substations located in HFTD zone 1, tier 3 and tier 2 areas.

Energy Safety finding: PG&E classified certain initiatives with quantitative targets as qualitative, providing narrative updates that reduced transparency in reporting. Additionally, PG&E's EC ARC did not appropriately provide progress on all expenditures.[14]

PG&E response: PG&E did not provide all expenditures as it has been a system limitation that we have been improving in future submissions and the formatting of the 2022 WMP. As a result, there were 18 expense initiatives and 16 capital initiatives over the threshold of an increase or decrease of more than $10 million and constituted a greater than 20 percent change in an initiative's planned total expenditure.

[11] *Id.*

[12] *Id.* at 33.

[13] *Id.*

[14] *Id.* at 33-34.

V. Responses to compliance issues related to Initiative Targets

PG&E's 2021 WMP Update included a total of 118 initiatives with targets, the majority of which were met or exceeded allocated across all 11 categories, which PG&E further subdivided into 147 unique sub-initiatives with targets.[15] For the purposes of this ARC, Energy Safety considers the 147 unique sub-initiatives as PG&E's complete list of 2021 WMP Update initiatives with targets.

Energy Safety's analysis, below, indicates that PG&E did not perform all the work required to meet 11 targets for various initiatives. Furthermore, PG&E did not establish that four other initiative targets were met because PG&E did not report data sufficient to support such a conclusion.

A. Initiatives PG&E did not substantially meet its target

1. Distribution pole replacement and reinforcement (7.3.3.6)

Energy Safety finding: PG&E reported that it reinforced 3,013 poles, instead of 4,100 poles as targeted, because less poles required reinforcement in 2021 than originally expected.[16] However, PG&E did not submit a Change Order request to reflect this adjustment and therefore Energy Safety considers the 2021 WMP Update target to be not met.[17]

PG&E response: PG&E was not aware that we could have updated the target to reinforce 4,100 poles. Note that we did surpass the pole replacement target of 9,800 with 16,359 poles replaced in 2021.

2. Generation enablement and deployment (7.3.3.11.1A)

Energy Safety finding: In response to Data Request 195, PG&E reported that it was unable to secure a Clean Substation Project candidate site for testing and that the project has

[15] *Id. a*t 7.

[16] *Id.* at 20.

[17] *Id.* at 20.

been delayed to the year 2024.[18]

PG&E's response: In 2021, via Decision (D.) 21-01-018, the Commission ordered PG&E to file an application for clean substation microgrid project for at least one substation. This would be an opportunity to pilot novel and not commercially tested technologies and start the transition toward clean generation. In its decision, the Commission set several conditions for the clean substation microgrid pilot projects, including technical requirements such as 48-hour islanding capabilities and financial requirements such that the cost of the project should not exceed twice the expected cost of utilized backup diesel generation over the contract period.

In 2021, PG&E launched a Request for Offer (RFO) to determine feasible options that would meet the criteria required by D.21-01-018. However, PG&E was not able to find successful projects that met the full set of criteria.

In 2022, PG&E launched a second RFO and was able to secure a successful bid from Energy Vault, who would develop a hybrid Hydrogen Fuel Cell and Battery Energy Storage microgrid solution. Due to the circumstances regarding the multiple RFOs, PG&E requested and was granted an extension to file its application to develop a clean substation microgrid pilot project.

In December 2022, PG&E sought CPUC approval of PG&E's plan to develop a Clean Substation Microgrid Pilot Project in Calistoga, California. The average time it takes to dispose of or receive a resolution is about 4.5 months.

In May 2023, CPUC approved PG&E's application and the related procurement contract with Energy Vault. The procurement contract has a Guaranteed Delivery Date of November 30, 2024, and a 10.5-year procurement timeline.

PG&E's response: PG&E agrees with this finding but notes that this work was delayed due to external factors, including the difficulty in securing a candidate that met the requirements of Decision (D.) 21-01-018. PG&E is currently working with Energy Vault to develop and

[18] *Id.*

operationalize this Microgrid Pilot Project. The Calistoga Clean Substation Microgrid Pilot Project will be a highly innovative, renewable energy microgrid to mitigate PSPS outages using green hydrogen fuel cells and battery energy storage.

3. Generation for PSPS mitigation (7.3.3.11.1C) (C.02)

Energy Safety finding: Under this initiative, PG&E's 2021 WMP Update proposed to develop at least five additional distribution microgrid pre-installed Interconnection Hubs and collaborate with county and local government to ensure local priorities help shape site selection and design where technically feasible.[19]

Energy Safety finding: Under this initiative, PG&E's 2021 WMP Update proposed to develop at least five additional distribution microgrid pre-installed Interconnection Hubs and collaborate with county and local government to ensure local priorities help shape site selection and design where technically feasible.

PG&E met its commitment to install five additional pre-installed Interconnection Hubs. However, in response to Data Request 195, PG&E provided documentation of coordination with local stakeholders, including the Placer County Water Authority, El Dorado County officials, the Middletown Rancheria of Pomo Indians of California, as well as the Butte County Sheriff's Office dated in 2020.[20] PG&E's response also stated that the relevant outreach was completed as "discussions with stakeholders" in 2020. These responses did not demonstrate that PG&E collaborated with these stakeholders in 2021, and therefore Energy Safety does not consider this initiative to have been met.[21]

PG&E response: Technical potential for feasible Pre-Installed Interconnection Hubs (PIH) site locations were scoped in 2019 and 2020, external communications were on-going with local and county leaders during scoping and construction as necessary. Status, updates and

[19] *Id.* at 21.

[20] *Id.*

[21] *Id.*

general information were provided annually during Regional Working Group sessions. Initial design, desk study, initial site walk, land review, operations review, public affairs, land acquisition, engineering, design and construction of a total of thirteen locations occurred over the course of several years. Given that this is a multi-year development process, PG&E was in regular contact with local and county officials during this period as part of either landowners of a PIH site or as standard PSPS process for pre-event and in-event notifications. During this period, it is not necessary for PG&E to engage with these local and county leaders outside of this process unless an issue arises. Since an issue requiring additional contact did not arise, and PG&E communicated with these leaders throughout this process, PG&E considers this initiative to be met.

4. Pole loading infrastructure hardening, and replacement program based on pole loading assessment program (7.3.3.13)

Energy Safety finding: PG&E completed 61,723 of 161,000 pole loading calculations, a 38% completion rate. PG&E reported that there were quality issues with the first vendor, and so a new contract had to be reviewed to ensure the quality of work.[22] PG&E reported that the new vendor onboarded additional resources to increase production, but that the status of the initiative was delayed as of the end of 2021.[23]

PG&E response: PG&E agrees that this initiative was delayed in 2021. PG&E worked with the new vendor in 2022 and 2023 to execute all the remaining HFTD pole loading assessments, and the volume of assessments delayed in 2021 were performed in 2022 and 2023. In 2022, PG&E performed pole loading assessments of approximately 241,000 poles. In 2023, PG&E performed pole loading assessments of approximately 139,000 poles.

[22] *Id.*

[23] *Id.* at 21.

5. Patrol inspections of distribution electric lines and equipment (7.3.4.11)

Energy Safety finding: PG&E reported completing 1,183,849 of 1,181,000 inspections targeted under this initiative, a 100% completion rate.[24] However, the Independent Evaluator reported that 427 of 1,250 sampled inspection documents (34%) were found to have inconsistencies, such as inconsistent barcode information, and this finding leads Energy Safety to conclude that this initiative target should not be considered met despite the 100% completion rate.[25]

PG&E response: Pole number bar codes were not a requirement in 2021. General Order 165 does not have any language in which our inspectors must install barcodes, however, PG&E installs barcodes for new construction or reconstruction. PG&E had a 100% completion rate for this target. Inconsistent barcode information should not preclude PG&E from meeting this target.

6. Patrol inspections of transmission electric lines and equipment (7.3.4.12)

Energy Safety finding: PG&E completed 131,063 of 191,000 inspections, a 69% completion rate.[26] PG&E reported that it either miscalculated or misinterpreted the forecasted number of inspections in its 2021 WMP Update and stated that there were only approximately 150,000 assets possible to inspect.[27] PG&E internally revised the target to 124,495 inspections, and exceeded that internal target, however PG&E did not submit a Change Order request to reflect this adjustment and therefore Energy Safety considers the 2021 WMP Update target to be not met.[28]

PG&E response: PG&E was not aware that initiative targets were eligible for inclusion in our 2021 Change Order request, as we did not include quarterly targets for this initiative in our

[24] *Id.*

[25] *Id.*

[26] *Id.*

[27] *Id.* at 21-22.

[28] *Id.* at 22.

QIU report.

7. Pole loading assessment program to determine safety factor (7.3.4.13)

Energy Safety finding: For this initiative, PG&E did not report discrete work conducted solely for purpose of this initiative, and instead referred to its work performed under initiative 7.3.3.13 (Pole loading infrastructure hardening, and replacement program based on pole loading assessment program) as supporting its goals for this initiative.[29] In any event, PG&E only completed 61,710 of 160,000 planned assessments in 2021, which resulted in a 38% completion rate.[30]

PG&E response: PG&E agrees that this initiative was delayed in 2021. PG&E worked with the new vendor in 2022 and 2023 to execute all the remaining HFTD pole loading assessments, and the volume of assessments delayed in 2021 were performed in 2022 and 2023. In 2022, PG&E performed pole loading assessments of approximately 241,000 poles. In 2023, PG&E performed pole loading assessments of approximately 139,000 poles.

8. Detailed inspections of vegetation around transmission electric lines and equipment (7.3.5.3)

Energy Safety finding: PG&E completed 218 of 200 target miles, a 109% completion rate.[31] However, Energy Safety's SVM Audit Report found that this initiative was not met as PG&E did not demonstrate that: (1) PG&E conducted onsite lopping, scattering, and chipping for fuel treatment; and (2) PG&E prioritized work based off vegetation age, which were both commitments PG&E made regarding how it would implement this initiative in its WMP.[32] This finding led Energy Safety to conclude that this initiative target should not be considered met despite the 109% completion rate.[33]

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[29] *Id.*

[30] *Id.*

[31] *Id.*

[32] *Id.*

[33] *Id.* at 22.

PG&E response: PG&E does not agree with Energy Safety's findings as it has conflated findings from two different programs—the Transmission Right of Way Expansion (ROW Ex) Program and the Integrated Vegetation Management (IVM) Program—and would like to address each finding separately per program.

Regarding the fuel treatment finding, we agree that PG&E did not formally document the type of fuel treatment used for ROW Ex projects in 2021. However, we note that the commitment did not include formal documentation regarding the type of treatment utilized. ROW Ex span completion is documented when one or all the fuel treatment methods are utilized to meet project requirements. PG&E does not document fuel treatment type due to the following reasons, which may cause multiple treatment types to be used in a specific location: vegetation conditions, terrain inaccessible to equipment, landowner agreements and environmental agreements. The ultimate goal of the ROW Ex program is to reduce ignitions and outages, and fuel treatment is a secondary benefit.

Regarding the vegetation age prioritization finding, we agree that PG&E did not formally document its prioritization of IVM projects in 2021. In 2024, PG&E published Utility Procedure TD-7111P-01 (Publication Date 02/20/2024, Effective Date 04/20/2024) which outlines a formal IVM project prioritization process. This process is now in place to support 2025 project prioritization.

9. Substation inspections, distribution (7.3.5.17.1)

Energy Safety finding: PG&E completed 439 of 439 substation inspections, a 100% completion rate. However, Energy Safety's SVM Audit Report found that 194 of the 439 inspections were completed from July to October 2020, and not within the November 15, 2020, to November 15, 2021, timeframe established by the 2021 WMP Update.[34] The SVM Audit Report found PG&E's corrective action plan responses on this initiative insufficient, and this finding leads Energy Safety to conclude that this initiative target should not be considered met

[34] *Id.* at 22.

despite the 100% completion rate.[35]

PG&E response: We disagree with this finding. While our planned inspection time frame is generally between November 15 of the prior year through November 15 of the current year, we completed some substation inspections prior to November 15, 2020. We consider these inspections to be part of our 2021 WMP commitment. Inspections for the 2021 inspection cycle were initiated as soon as practical due to the large number of inspections that we needed to complete by the end of 2021. Completing inspections earlier in the cycle also provided additional lead time for any agency permits, environmental releases, or property owner negotiations required for work identified during the inspection. PG&E should not be found out of compliance for completing work earlier than anticipated.

10. Substation inspections, Transmission (7.3.5.17.2)

Energy Safety finding: PG&E's 2021 WMP Update committed to complete 41 inspections of electric transmission substations not within or adjacent to Tier 2 and Tier 3 HFTD areas between November 15, 2020, and November 15, 2021. In its QIU, PG&E reported that it completed all these inspections as of December 31, 2021. However, Energy Safety's SVM Audit Report stated that 19 of 41 inspections were completed prior to November 15, 2020, through November 15, 2021, period established by the 2021 WMP Update.[36] The SVM Audit Report found PG&E's corrective action plan responses on this initiative insufficient, and this finding leads Energy Safety to conclude that this initiative target should not be considered met despite the 100% completion rate.[37]

PG&E response: Similar to the previous item, we disagree with this finding for the same reasons. While our planned inspection time frame is between November 15 of the prior year through November 15 of the current year, we completed some substation inspections prior to

[35] *Id.* at 23.

[36] *Id.*

[37] *Id.* at 23.

November 15, 2020. We consider these inspections to be part of our 2021 WMP commitment. Inspections for the 2021 inspection cycle were initiated as soon as practical due to the large number of inspections that we needed to complete by the end of 2021. Completing inspections earlier in the cycle also provided additional lead time for any agency permits, environmental releases, or property owner negotiations required for work identified during the inspection. PG&E should not be found out of compliance for completing work earlier than anticipated.

11. Substation vegetation management, distribution (7.3.5.18.1)

Energy Safety finding: PG&E completed 166 out of 176 substation maintenance operations, a 94% completion rate. However, in its QIU, PG&E reported that it reduced its target under this initiative to 170 in Q2 "due to listing substations with two or more switchyard as one location" and that 166 substation maintenance operations were completed by the end of Q2. PG&E stated that "the remaining 4 locations were unable to be completed because they have been delayed by the coastal development permit process, which has now lasted over a full year." Energy Safety's SVM Audit Report found PG&E's corrective action plan responses on this issue to be insufficient.[38] PG&E did not submit a Change Order request to reflect its adjusted target, and given the findings from the SVM Audit Report, Energy Safety determines that this initiative's target has not been met.[39]

PG&E response: PG&E disagrees that this finding represents a compliance failure. PG&E attempted to submit a change order for 2021 distribution inspection targets. However, this change order was rejected because the change from 176 to 170 substation inspections did not meet Energy Safety's 5% change criteria since this was only a 3.4% change in the initiative target. While the initial annual distribution target was 176 substations, due to the sale or decommissioning of assets as well as grouping co-located facilities, this target was reduced to 170 sites. Regarding Electric Distribution Substations within or adjacent to Tier 2 and

[38] *Id.*

[39] *Id.* at 23-24.

Tier 3 HFTD, 166 of the 170 total sites (98%) were mitigated by the end of Q2. However, the remaining four locations were in progress but were unable to be mitigated due to external factors because they were delayed by the coastal development permit process. The permit process concluded, and this work has been completed since 2021.

B. Initiatives PG&E did not report data sufficient to support a conclusion

Energy Safety finding: Following are the four initiatives for which Energy Safety was unable to determine compliance due primarily to PG&E's failure to provide data adequate to support a finding:

1. Other discretionary inspection of transmission electric lines and equipment (7.3.5.10).[40]
2. Patrol inspections of vegetation around transmission electric lines and equipment (7.3.5.12).[41]
3. Removal and remediation of trees with strike potential to electric lines and equipment (7.3.5.16).[42]
4. Vegetation management to achieve clearances around electric lines and equipment (7.3.5.20).[43]

PG&E response: PG&E does not agree with Energy Safety's findings and believes adequate data was provided to support these four initiatives. We also want to reiterate that these initiatives were not meant to establish clear targets for this work but instead, explain how we approach the work. The programs that these initiatives fall under were referenced in sections 7.3.5.2 and 7.3.5.3 of the 2021 WMP. After work was completed in 2021 and validated, we documented our 2021 plans and actuals in the 2022 WMP.

[40] *Id.* at 24.

[41] *Id.* at 24.

[42] *Id.* at 24.

[43] *Id.* at 24.

In section 7.3.5.2, we state that our 2021 plan for the Routine VM Program was to inspect approximately 80,000 miles of primary overhead electric distribution facilities, and approximately 1,486,330 trees were completed by December 31, 2021. Our 2021 plan for the Tree Mortality Program was to perform additional patrol inspections and tree trimming within State Responsibility Areas, Wildland Urban Interface areas, Fire Hazard Severity Zones and designated High Fire-Threat Districts approximately six months after routine annual patrols. Approximately 34,189 trees were completed by December 31, 2021. Our 2021 plan for the Enhanced Vegetation Management (EVM) Program was 1,800 miles, and approximately 1,983 miles were completed by December 31, 2021.

In section 7.3.5.3, we state that our 2021 plan for the Transmission Routine NERC Program was 6,800 miles, and approximately 6,564.7 miles were completed by year-end. Our 2021 plan for the Transmission Routine Non-NERC Program was 11,400 miles, and approximately 11,193.1 miles were completed by year-end. Our 2021 plan for the Transmission ROW Ex was 200 miles, and approximately 217.9 miles were completed by year-end. Our 2021 plan for the Transmission IVM Program was to perform ongoing maintenance to maintain cleared rights-of-way in a sustainable and compatible way. Approximately 10,138 acres were completed by year-end.

VI. ADDITIONAL CONSIDERATIONS

PG&E notes that, unlike Energy Safety's 2020 ARC, no draft of the ARC was published for public comment, only a final version. While Energy Safety is permitting comments on the final version of the 2021 ARC, we believe it would be beneficial for all parties to issue a draft version of the ARC and allow the parties to offer public comment, as was done with the 2020 ARC. This would provide parties with a vehicle to offer input and help identify any potential errors in the ARC before it is finalized.

Lastly, PG&E recognizes the challenging administrative burden of producing an ARC for each California utility but would urge Energy Safety to issue the ARCs in less than the statutorily

permitted 18 month timeline, if possible.[44] When added to the three months the utilities are provided to prepare their own ARCs, this means the Energy Safety ARC is not issued until 21 months after the work at issue is completed.[45] Energy Safety's feedback is critical and receiving the ARC sooner would allow the feedback to be implemented sooner, benefitting all parties.

VII. CONCLUSION

PG&E appreciates Energy Safety's acknowledgement of PG&E's efforts to execute and meet its 2021 WMP Updates. We take seriously the report's conclusions and have made organizational improvements to prevent the recurrence of these issues. We look forward to continuing our work with Energy Safety to achieve our goal of ending catastrophic wildfires. While we recognize that PG&E, like all the utilities, has areas to improve and lessons to learn, we believe that the actions we took and the outcomes that we achieved in 2021 clearly demonstrate substantial compliance with the 2021 WMP.

[44] *See* Cal Pub. Util. Code § 8386.3(c)(4).

[45] See Cal. Pub. Util Code § 8386.3(c)(1).