



October 11, 2024

To: Pacific Gas and Electric Company  
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**SUBJECT: Office of Energy Infrastructure Safety’s Report on Pacific Gas and Electric Company’s (PG&E’s) 2022 Substantial Vegetation Management Audit**

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) completed its final report on PG&E’s 2022 Substantial Vegetation Management (SVM) audit. Energy Safety finds that PG&E substantially complied with the substantial portion of the vegetation management requirements in its 2022 Wildfire Mitigation Plan Update.

The attached report follows Energy Safety’s publication of its SVM audit on July 26, 2024, and PG&E’s subsequent response on August 26, 2024. Pursuant to statutory requirements, a copy of this report is issued to PG&E, published on Energy Safety’s 2022 SVM Docket<sup>1</sup> and provided to the California Public Utilities Commission.

Sincerely,

A handwritten signature in cursive script that reads "Sheryl Bilbrey".

Sheryl Bilbrey  
Program Manager, Environmental Science Division  
Office of Energy Infrastructure Safety

Cc:  
Karen McLaughlin, Energy Safety  
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<sup>1</sup> All documents related to Energy Safety’s Report on PG&E’s 2022 Substantial Vegetation management Audit are available on Energy Safety’s e-filing system under the “2022-SVM” docket and available here: <https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2022-SVM> [accessed October 8, 2024]

Sandra Rubio, PG&E  
Wade Greenacre, PG&E



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**  
**2022 SUBSTANTIAL VEGETATION**  
**MANAGEMENT AUDIT REPORT**  
**PACIFIC GAS AND ELECTRIC COMPANY**

October 2024

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# 1. Introduction

Pursuant to Public Utilities Code section 8386.3(c)(5), the Office of Energy Infrastructure Safety (Energy Safety) must audit the vegetation management work performed by, or on behalf of, an electrical corporation. The Audit shall specify any failure of the electrical corporation to fully comply with the vegetation management requirements in its Wildfire Mitigation Plan (WMP).<sup>1</sup> Energy Safety then provides the Audit to the electrical corporation and grants it a reasonable time to correct and eliminate any deficiency there in, documented in a Corrective Action Plan (CAP). Following receipt and review of the electrical corporation's CAP, Energy Safety issues an audit report to the electrical corporation identifying whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the applicable year.<sup>2</sup> This document is Energy Safety's Report on the 2022 Substantial Vegetation Management (SVM) Audit of Pacific Gas and Electric Company (PG&E).

Energy Safety published the 2022 Pacific Gas and Electric Company (PG&E) Substantial Vegetation Management (SVM) Audit on July 26, 2024.<sup>3</sup> The Audit concluded that PG&E did not perform all the work specified in 15 out of the 21 vegetation management initiatives in its 2022 WMP Update as shown in Section 2, Table 1. In response to the Audit, PG&E submitted its CAP on August 26, 2024.<sup>4</sup> Energy Safety reviewed PG&E's CAP as part of the analysis presented in Section 3 of this document and, based on the additional information provided and corrective actions taken, Energy Safety determined that PG&E substantially complied with the substantial portion of the vegetation management requirements in its 2022 WMP Update.

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<sup>1</sup> Pub. Util. Code, § 8386.3(c)(5)(A).

<sup>2</sup> [2023 Compliance Guidelines, Section 6.1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true) (September 2023). p. 15. (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true, accessed August 26, 2024).

<sup>3</sup> [Energy Safety's 2022 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true, accessed August 26, 2024).

<sup>4</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

## 2. 2022 SVM Audit Findings

The 2022 SVM Audit found that PG&E performed all work in 6 of the 21 Initiatives and was deficient in the remaining 15. Table 1 below is reproduced from Energy Safety's 2022 SVM Audit.

Table 1. PG&E's 2022 SVM Audit Summary

Number	Initiative	Audit Finding
7.3.5.1	Additional Efforts to Manage Community and Environmental Impacts	<b>Did Not Perform All Required Work</b>
7.3.5.2	Detailed Inspections and Management Practices or Vegetation Clearances around Distribution Electrical Lines and Equipment	<b>Did Not Perform All Required Work</b>
7.3.5.3	Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electrical Lines and Equipment	<b>Did Not Perform All Required Work</b>
7.3.5.4	Emergency Response Vegetation Management due to Red Flag Warning or Other Urgent Weather Conditions	<b>Did Not Perform All Required Work</b>
7.3.5.5	Fuel Management (including all wood management) and Reduction of "slash" from Vegetation Management Activities	Performed Required Work
7.3.5.6	Improvement of Inspections	<b>Did Not Perform All Required Work</b>
7.3.5.7	Remote Sensing Inspections of Vegetation Around Distribution Electric Lines and Equipment	Performed Required Work
7.3.5.8	Remote Sensing Inspections of Vegetation Around Transmission Electric Lines and Equipment	Performed Required Work
7.3.5.9	Other Discretionary Inspections of Vegetation Around Distribution Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations	<b>Did Not Perform All Required Work</b> Refer to 7.3.5.20
7.3.5.10	Other Discretionary Inspections of Vegetation Around Transmission Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations	<b>Did Not Perform All Required Work</b> Refer to 7.3.5.3
7.3.5.11	Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment	<b>Did Not Perform All Required Work</b>

		Refer to 7.3.5.2
7.3.5.12	Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment	<b>Did Not Perform All Required Work</b> Refer to 7.3.5.3
7.3.5.13	Quality Assurance / Quality Control of Vegetation Management	<b>Did Not Perform All Required Work</b>
7.3.5.14	Recruiting and Training of Vegetation Management Personnel	<b>Did Not Perform All Required Work</b>
7.3.5.15	Identification and Remediation of “At-Risk Species”	Performed Required Work
7.3.5.16	Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment	<b>Did Not Perform All Required Work</b> Refer to 7.3.5.2 and 7.3.5.3
7.3.5.17	Substation Inspection	<b>Did Not Perform All Required Work</b>
7.3.5.18	Substation Vegetation Management	<b>Did Not Perform All Required Work</b> Refer to 7.3.5.17
7.3.5.19	Vegetation Management System	Performed Required Work
7.3.5.20	Vegetation Management to Achieve Clearances Around Electric Lines and Equipment	<b>Did Not Perform All Required Work</b>
7.3.5.21	Vegetation Management Activities Post-Fire	Performed Required Work



### 3. Substantial Vegetation Management Compliance Analysis

Energy Safety is required to assess whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the applicable compliance year.<sup>5</sup> The determination of substantial compliance is based on an analysis of both the electrical corporation's compliance with each vegetation management initiative as well as the program overall. The initiative level analysis includes:

- 1) **Achievement of Objective-** Determination of whether the electrical corporation's deficiencies, after considering its planned corrective actions, have not detracted from the electrical corporation's ability to achieve the objectives of its vegetation management programs; and
- 2) **Good Faith Effort-** Determination of whether the electrical corporation's effort to fulfill the vegetation management requirement constituted a good faith effort to comply with the vegetation management requirements in the approved WMP.

The final analysis includes a synthesis of initiative level analysis and a programmatic assessment of whether the electrical corporation completed the large majority of the vegetation management requirements in its approved WMP.

Energy Safety's Audit document, dated July 26, 2024, concluded that PG&E did not perform some element of the work for 15 of the 21 vegetation management initiatives in its 2022 WMP Update as noted in Table 1 above. Section 3.1 is the initiative level assessment which includes: 1) a summary of the 2022 SVM audit finding, 2) the CAP submitted by PG&E specific to the audit finding, and 3) Energy Safety's analysis and determination of compliance with the substantial vegetation management portions of the 2022 WMP Update. Section 3.2 is Energy Safety's programmatic assessment of PG&E's completion of the large majority of the vegetation management requirements. As detailed in Section 3.2, Energy Safety found that PG&E was able to demonstrate that it performed work that met the objective or provided additional information in its CAP to sufficiently demonstrate that it substantially complied with 16 of the 21 vegetation management initiatives in its 2022 WMP Update. As a result, the section finds that programmatically, PG&E performed the large majority of the work described in its 2022 WMP Update.

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<sup>5</sup> Pub. Util. Code, § 8386.3(c)(5)(C).

## 3.1 Initiative Level Assessment

### 3.1.1 Initiative 7.3.5.1: Additional Efforts to Manage Community and Environmental Impacts

#### 2022 SVM Audit Finding

PG&E's 2022 WMP update stated that "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 [its] planning and customer outreach approach across all VM programs, where applicable."<sup>6</sup> Because PG&E only provided examples of advanced customer notifications alerting customers of upcoming Enhanced Vegetation Management (EVM) work, and did not provide examples of advanced customer notifications for its other vegetation management programs, Energy Safety's 2022 SVM Audit found that PG&E did not extend its planning and customer outreach approach across all vegetation management programs in 2022.<sup>7</sup>

#### PG&E's CAP Response

PG&E disagrees with Energy Safety's finding and states in its CAP that "PG&E extended [its] planning and customer outreach approach across all VM programs where applicable, including all programs on the One VM tool in 2022."<sup>8</sup> PG&E's CAP stated that "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."<sup>9</sup>

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<sup>6</sup> [PG&E's 2022 WMP Update](#) (Rev. #1, July 26, 2022) (hereafter PG&E's 2022 WMP Update), p. 722 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true>, accessed June 12, 2024).

<sup>7</sup> [Energy Safety's 2022 SVM Audit of PG&E](#) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>8</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](#), p. 3 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true>PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>9</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](#), p. 3 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true>PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

PG&E's CAP also included work performed by PG&E in 2023 and 2024 to perform "proactive customer notifications" for PG&E's Annual Distribution, Second Patrol, and Vegetation Control programs.<sup>10</sup>

## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

### *Criteria 1: Achievement of Objective*

The objective of this initiative is to mitigate negative impacts from utility vegetation management to local communities by coordination with communities to plan and execute vegetation management work.<sup>11</sup> With regard to PG&E expanding its customer outreach approach across all VM programs in 2022, PG&E stated "in 2022, our customer outreach approach did not expand across all VM programs due to the transition of VM programs to One VM from the Legacy systems. PG&E did, however, provide advance notification to customers and landowners prior to inspection and tree work for the EVM Program."<sup>12</sup> As a result, Energy Safety could only verify that PG&E provided advanced notification to customers prior to inspection and tree work for PG&E's EVM Program. However, as detailed in the 2022 SVM Audit, PG&E provided supporting documentation indicating that PG&E held several meetings with local government agencies that included presentations discussing the scope of PG&E's vegetation management work.<sup>13</sup> Additionally, PG&E provided blank templates of vegetation management notification letters that explained the scope of its EVM program, and general expectations as to what a customer should expect during general vegetation inspections on their property.<sup>14</sup> Lastly, PG&E provided examples of advanced notifications for its EVM program.<sup>15</sup> Energy Safety finds that PG&E's implementation of these customer outreach activities met the objective of this initiative, as PG&E demonstrated that it communicated with local communities to provide transparency of its vegetation management work.

### *Criteria 2: Good Faith Effort*

PG&E's provided information and supporting documents indicates that PG&E made a good faith effort to meet the objective of this initiative by communicating with local communities

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<sup>10</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 3

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>11</sup> [Update Guidelines](#), attachment 2, p. 92

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed June 10, 2024).

<sup>12</sup> Response to DR-223, question 4; attachment "DRU13344\_2022 SVM 7.3.5.1\_DR\_OEIS\_D001.pdf," p. 6.

<sup>13</sup> [Energy Safety's 2022 SVM Audit of PG&E](#), p. A-2

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>14</sup> [Energy Safety's 2022 SVM Audit of PG&E](#), p. A-3

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>15</sup> [Energy Safety's 2022 SVM Audit of PG&E](#), p. A-4

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

to provide transparency of its vegetation management work. However, PG&E did not provide necessary documentation to support that it extended its planning and customer outreach to all of its vegetation management programs in 2022.

### *Initiative Level Determination*

PG&E was not able to provide documentation to substantiate all statements in support of this initiative. In future compliance years, Energy Safety expects that PG&E will make improvements to its recordkeeping so that it can provide such documentation and provide a full accounting of their planning and outreach activities. However, because PG&E was able to demonstrate that it communicated with local communities to provide transparency of its vegetation management work by holding meetings with local communities and alerting customers of upcoming EVM work, Energy Safety finds that PG&E substantially complied with the objective of this initiative.

## **3.2.1 Initiative 7.3.5.2: Detailed Inspections of Vegetation Around Distribution Electric Lines and Equipment**

The purpose of this initiative is to provide careful visual inspections and maintenance of vegetation around the distribution right-of-way.<sup>16</sup> The initiative included PG&E's inspection of approximately 80,000 miles of distribution electric lines on a recurring cycle, and the inspection and clearance work of PG&E's utility poles. The work uses a variety of patrol types: Routine Patrols, Second Patrols (which also encompassed Tree Mortality Patrols), EVM Patrols, and Vegetation Controls (Pole Clearing). Energy Safety had findings related to two of the four patrol types as described below:

### Tree Mortality Patrol

#### 2022 SVM Audit Finding

Energy Safety's 2022 SVM Audit found that PG&E did not follow the Tree Mortality Maintenance Plan described in its 2022 WMP Update to remove all identified work within 180 days for HFTD areas or within 365 days for non-HFTD areas.<sup>17</sup>

#### PG&E's CAP Response

PG&E's CAP stated that work on some trees was constrained and referred to this 2022 WMP Update statement: "PG&E may be constrained by environmental delays, customer refusals or

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<sup>16</sup> [Update Guidelines](#), attachment 2, p. 92.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed June 10, 2024).

<sup>17</sup> [Energy Safety's 2022 SVM Audit of PG&E](#), p. A-9

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

noncontacts, permitting delays/restrictions or operational holds, weather conditions, active wildfire, and accessibility of the area where distribution system inspections have been identified.”<sup>18</sup> Additionally, PG&E stated in its CAP that “under the Tree Mortality Patrol initiative, only dead and dying trees are prioritized for work within 180 or 365 days based on location.”<sup>19</sup>

As part of its CAP, PG&E provided an Excel file listing records of its Tree Mortality Patrol program. The records indicate the following:

Of the 52,578 dead or dying trees in HFTD areas that were inspected and prescribed work in 2022 and that PG&E expects to fail and strike conductors:

- 945 were still marked as constrained and pending work as of August 26, 2024. PG&E stated that “it is continuing to work on resolving these constraints and will complete the work as soon as possible.”
- 7,657 were assigned a work completion date more than 180 days after inspection due to a constraint that was later cleared.<sup>20</sup>

Of the 7,248 dead or dying trees in non-HFTD areas that were inspected and prescribed work in 2022, and that PG&E expects to fail and strike conductors:

- 107 were still marked as constrained as of August 26, 2024. PG&E stated that “it is continuing to work on resolving these constraints and will complete the work as soon as possible.”
- 211 trees were worked later than 365 days following inspection due to a constraint that was later cleared<sup>21</sup>

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<sup>18</sup> [PG&E’s 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true), p. 728

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true>, accessed June 12, 2024).

<sup>19</sup> [PG&E’s 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), pp. 4-5

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>20</sup> [PG&E’s 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 5

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>21</sup> [PG&E’s 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 6

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).



## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

### *Criteria 1: Achievement of Objective*

PG&E's CAP response stated that its Tree Mortality Maintenance Plan only requires PG&E to "prioritize work"<sup>22</sup> on dead or dying trees within the time frames stated and attributed the delayed and incomplete work to constraints such as environmental permitting, customer refusals, and access issues. PG&E did not provide justification in its CAP as to why PG&E could not resolve the constraints associated with the identified work or demonstrate that it attempted to resolve the constraints. As a result, Energy Safety finds that the constraints associated with the delayed and incomplete tree work do not account for the missed timeframes for removing dead and dying trees which posed ignition risk in 2022 and continued to pose ignition risk in 2023 and 2024 because 1,052 dead and dying trees first identified in 2022 had not been removed as of August 26, 2024.<sup>23</sup> PG&E's inability to complete this work detracted from PG&E's Tree Mortality Patrol objective of expediting mitigation work to address trees that were "expected to fail and strike conductors."

### *Criteria 2: Good Faith Effort*

The fact that mitigation work for 1,052 trees that were expected to fail and strike conductors in 2022 still has not been completed as of August 26, 2024, demonstrates that PG&E did not make a good faith effort to meet the requirements of its Tree Mortality Maintenance Plan. Additionally, PG&E stated in its CAP that it discusses dead and dying tree work timelines as part of its Daily Operating Review (DOR) meetings and has created a dashboard using Microsoft Power BI software to more accurately track dead and dying tree work.<sup>24</sup> However, PG&E's CAP did not demonstrate processes or procedures for the timely resolution of constraints and completion of tree work within the stated timelines. Because PG&E's CAP did not demonstrate that PG&E attempted to resolve the constrained tree work to comply with the timelines of its Tree Mortality Maintenance Plan, Energy Safety concludes that PG&E did not make a good faith effort to meet the objective of its Tree Mortality Maintenance Plan.

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<sup>22</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), pp. 4-5 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=truePG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>23</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), pp. 5-6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=truePG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>24</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=truePG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

### *Sub-Initiative Level Determination*

PG&E did not complete a significant portion of the identified tree work within the specified time frame and its CAP response did not demonstrate that PG&E attempted to resolve the constraints associated with the delayed and still pending tree work in 2022 or future compliance periods. PG&E only demonstrated that it continued to track the work. PG&E's inability to remove the constrained trees detracted from PG&E's ability to reduce wildfire risk from its system. Energy Safety expects that PG&E will continue to mature its Tree Mortality Patrol program by further building out and developing the "Constraint Resolution Procedural Guideline"<sup>25</sup> described in PG&E's 2023-2025 WMP to efficiently complete constrained tree work in a timely manner. This program will be audited by Energy Safety in future compliance years. Energy Safety finds that PG&E did not substantially comply with this portion of the Initiative.

## Pole Clearing

### 2022 SVM Audit Finding

PG&E committed to "Inspect and clear (where clearance is needed) all poles identified in **PG&E's Vegetation Management Database as of October 1, 2021...**"<sup>26</sup> (emphasis added). The 2022 SVM Audit found that PG&E's database was incomplete and did not provide records of all poles it operated. Specifically, Energy Safety's 2022 SVM audit found that PG&E could not provide an updated list of "the total number of poles that existed in PG&E's service area in 2022 and that were both (1) in HFTD areas or HFRA, and (2) are not required to be inspected and cleared by Public Resources Code section 4292."<sup>27</sup> Energy Safety acknowledges that PG&E only explicitly committed to performing inspection and pole clearing work for all poles identified in its database and not all poles in its service territory.

### PG&E's CAP Response

PG&E disagreed with the finding and stated in its CAP that "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."<sup>28</sup> As a result of the data pull, they identified 8,356 poles.

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<sup>25</sup> [PG&E's 2023-2025 WMP](#), p. 598

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56145&shareable=true>, accessed August 2, 2024).

<sup>26</sup> [PG&E's 2022 WMP Update](#), p. 727

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true>, accessed June 12, 2024).

<sup>27</sup> [Energy Safety's 2022 SVM Audit of PG&E](#), p. A-10

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>28</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](#), pp. 7-8

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

PG&E's CAP states that transitioning to the One VM system in 2023 allowed PG&E to better track the poles that it operates, giving a more accurate pole count. However, PG&E's CAP does not indicate whether/how PG&E addressed the deficiency in 2022.

## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

### *Criteria 1: Achievement of Objective*

Because PG&E's 2022 WMP Update stated that it would clear poles documented in its database as of October 1, 2021, which only included 8,356 poles, it did technically comply with this pole clearing target. While PG&E cleared the number of poles in its database and met the pole clearing target for 2022, the fact that PG&E's database did not include a full population of PRC 4292 exempt poles in its service territory indicates a serious recordkeeping deficiency existed in PG&E's vegetation management database in 2022 which detracted from PG&E's ability to address wildfire risk. PG&E failed to communicate the extent of this deficiency to Energy Safety either at the time of the 2022 WMP Update submission, or in the numerous compliance touch points since that time. Energy Safety made a data request on July 1, 2024, for the total number of poles in PG&E's service area, and PG&E was unable to provide that information for either 2022 or 2023 in their response on July 10, 2024. PG&E was only able to provide information for poles in their database which it admitted was incomplete.<sup>29</sup> To fully understand how much risk remains on PG&E's system, PG&E must provide a database with an accurate accounting of how many PRC 4292 exempt poles were cleared relative to the total number in the system. Without an accurate accounting of their system, PG&E cannot provide a clear scope of their pole clearing activities and, consequently, Energy Safety cannot assess if PG&E is meeting the intention of its pole clearing objective to reduce wildfire risk. PG&E has not been transparent about the limitations of its vegetation management database which has prevented PG&E from understanding the impact of pole clearing on wildfire risk reduction in its system.

### *Criteria 2: Good Faith Effort*

As discussed above, the documentation provided by PG&E indicates that PG&E met the requirements of its 2022 WMP Update. Thus, Energy Safety concludes that PG&E made a good faith effort to comply with the minimum required work for this vegetation management sub-initiative. However, Energy Safety recognizes that the language of the WMP Update allows PG&E to achieve the objective as written but not the intention of the initiative, which is to reduce wildfire risk.

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<sup>29</sup> Response to DR-251, question 1; attachment "DRU13908\_Energy Safety DR-251\_DR\_OEIS\_D001.pdf," p. 1

### Sub-Initiative Level *Determination*

PG&E's failure to keep accurate records of its pole's PRC 4292 exemption status limited PG&E's ability to effectively track and implement meaningful work that would have effectively reduced wildfire risk in 2022. Having an accurate accounting of the location of its infrastructure, the assets installed, exemption status, and the timing and frequency of vegetation maintenance activities is critical to PG&E's wildfire mitigation efforts. PG&E cannot adequately plan or implement its inspection or clearing strategy without this information. Furthermore, if PG&E does not have an accurate database it must be transparent about its deficiencies and develop and implement a plan to correct these deficiencies and communicate this plan to Energy Safety. Energy Safety expects that PG&E will continue to mature its pole clearing program by fully transitioning to the One VM platform as stated in its CAP and establish a comprehensive database of its utility pole assets to ensure pole clearing requirements are met in future years. Furthermore, if all poles are not cleared in its service area during a compliance year, Energy Safety expects that PG&E will convey how many poles were cleared relative to the total number of poles in its service area, and the frequency with which pole clearing activities were conducted, so that Energy Safety will be able to fully characterize the scope of any shortfalls during the audit cycle. Although PG&E's 2022 Vegetation Management Database had limited asset information, Energy Safety finds that because PG&E was able to provide documentation that it inspected and cleared (where clearance was 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, PG&E complied with the requirements of this pole clearing target.

### Initiative Level *Determination*

This initiative contained several components including the implementation of several patrol types and Energy Safety found that PG&E met the requirements described in PG&E's 2022 WMP Update related to its Routine Patrol, EVM Patrol, and Vegetation Controls (pole clearing) programs. However, as discussed above, Energy Safety expects that PG&E will continue to mature its Tree Mortality Patrol and pole clearing programs by addressing the deficiencies identified above. Energy Safety finds that PG&E substantially complied with this initiative.

### **3.1.2 Initiative 7.3.5.3: Detailed Inspections of Vegetation Around Transmission Electric Lines and Equipment**

#### **2022 SVM Audit Finding**

Energy Safety's 2022 SVM audit found that PG&E completed only 4,979 of the 9,000 acres or 55% of the work described in PG&E's Integrated Vegetation Management (IVM) target.<sup>30</sup> Additionally, PG&E could not provide documentation from 2022 showing that aging work cycles and re-growth rates were incorporated into the overall work prioritization in 2022.<sup>31</sup>

#### **PG&E's CAP Response**

PG&E stated in its CAP that "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."<sup>32</sup> Energy Safety could not verify from PG&E's CAP that PG&E carried over the missed IVM work into later years.

PG&E also stated that "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."<sup>33</sup> PG&E provided a copy of its ROWX and TIVM Standard published on February 20, 2024, which identifies the teams responsible for creating the Transmission Integrated Vegetation Management (TIVM) scope of work, and documents that the prioritization of TIVM is based on aging work cycles and evaluation of vegetation regrowth rates.<sup>34</sup>

### **Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update**

#### ***Criteria 1: Achievement of Objective***

PG&E's transmission vegetation management program consists of three components: Routine North American Electric Reliability Corporation (NERC), Routine Non-NERC, and

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<sup>30</sup> [Energy Safety's 2022 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true), p. A-18.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>31</sup> [Energy Safety's 2022 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true), p. A-18.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>32</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 8

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>33</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 8

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>34</sup> PG&E's 2022 SVM Audit Corrective Action Plan (August 26, 2024); attachment "DRU14062\_Statement 16\_Atch01\_TD-7111S ROWX and TIVM Standard Redacted"



Integrated Vegetation Management (IVM). As detailed in Energy Safety's 2022 SVM Audit, PG&E completed two vegetation management programs: Routine NERC and Non-NERC vegetation inspections which identified and remediated vegetation encroachment issues and hazardous trees along PG&E's transmission rights-of-ways. Energy Safety's finding is related to the third program, IVM. PG&E's failure to complete its IVM program target detracted from PG&E's ability to accomplish long-lasting risk remediation work such as the establishment of vegetation communities that are compatible with PG&E's transmission rights-of-way.<sup>35</sup> Furthermore, Energy Safety cannot independently evaluate whether work conducted as a part of NERC and non-NERC programs meets the same data quality objectives those required for IVM and cannot be used as a substitution for work required under the 2022 WMP Update for IVM. Regardless, Energy Safety recognizes the work PG&E completed as a part of the NERC and non-NERC programs at least partially remediated wildfire risk along its transmission rights-of-ways. However, PG&E committed to implementation of an IVM program that maintains cleared rights-of-way in its WMP<sup>36</sup> and failed to do so. Because PG&E only completed work related to two of its three vegetation management inspection programs, Energy Safety finds PG&E did not fully achieve the objective of this initiative.

### **Criteria 2: Good Faith Effort**

PG&E prioritized distribution work over transmission work without supplying justification for this decision and did not provide Energy Safety with proper notification of this change. Furthermore, PG&E did not identify any uncontrolled factors in its CAP that may have contributed to PG&E's inability to complete the IVM target or publish procedural documentation outlining the IVM program's work prioritization schedule. For this reason, Energy Safety concludes that PG&E did not make a good faith effort to complete the vegetation management requirements of its IVM program.

### **Initiative Level Determination**

While PG&E completed work in two of its three vegetation management programs, it completed only half of the work prescribed for its IVM program. Furthermore, PG&E failed to provide documentation or justification for why other work was prioritized. Energy Safety expects that, in future compliance years, PG&E will allocate sufficient resources during its planning process to complete all work under this initiative. At a minimum PG&E must notify Energy Safety of changes to its work schedules related to prioritization of other vegetation management work and provide evidence of and justification for reallocation of resources to meet higher priority targets within the compliance year. Energy Safety finds that PG&E did not substantially comply with this initiative.

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<sup>35</sup> [Energy Safety's 2022 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true), p. A-15

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>36</sup> [PG&E's 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true), p. 731

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true>, accessed June 12, 2024).

### 3.1.3 Initiative 7.3.5.4: Emergency Response Vegetation Management Due to Red Flag Warning or Other Urgent Conditions

#### 2022 SVM Audit Finding

Energy Safety's 2022 SVM Audit found that:

- 1.) PG&E failed to remediate 54 Priority 1 (P1) trees, and 4,804 Priority 2 (P2) trees within the timeframe specified in procedure TD-7102P-17.<sup>37</sup>
- 2.) 102 P1 and P2 tree records in PG&E's system of record had work dates prior to inspection dates.<sup>38</sup> Energy Safety requested PG&E to provide procedures in its CAP that ensure remediation dates are recorded after inspection dates moving forward.<sup>39</sup>
- 3.) 157 P1 and P2 trees had a "NULL" remediation date.<sup>40</sup> Energy Safety requested PG&E to provide documentation in its CAP that the priority trees with "Null" remediation dates were remediated in 2022.<sup>41</sup>

#### PG&E's CAP Response

PG&E was able to provide additional information in its CAP and other data request responses that explain why 33 of the 54 P1 work orders had delayed mitigation dates. The information indicates that PG&E either followed the delayed remediation steps laid out in TD-7102P-17, or that the delayed work was the result of duplicate work orders in which one of the duplicate records was not immediately closed.<sup>42</sup> PG&E could not explain why 21 of the 54 P1 work orders were delayed and stated that it would "continue to research the cause of the delay."<sup>43</sup> Lastly, PG&E's CAP did not explain why 4,804 P2 trees had delayed remediation work, and did

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<sup>37</sup> [Energy Safety's 2022 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true), p. A-22

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>38</sup> [Energy Safety's 2022 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true), p. A-22

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>39</sup> [Energy Safety's 2022 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true), p. A-23

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>40</sup> [Energy Safety's 2022 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true), p. A-22.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>41</sup> [Energy Safety's 2022 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true), p. A-23.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>42</sup> Response to DR-251, question 6; attachment "RE\_09-13-22 North Valley Priority One Locations - Approved Mitigation Plan\_Redacted.pdf," and [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), pp. 8-9

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>43</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 9

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

not provide corrective measures to complete the identified P1 and P2 tree work in a more efficient and timely manner moving forward.

Regarding the 102 trees that showed work dates prior to inspection dates, PG&E stated:

...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.<sup>44</sup>

Regarding the 157 P1 and P2 trees with “NULL” remediation dates,<sup>45</sup> PG&E’s CAP response provided additional information regarding the status of the trees as follows:<sup>46</sup>

- 17 priority work orders were completed on alternate work requests and the original tag was closed.
- 95 P2 work orders are still delayed due to an active constraint present.
- 45 priority work orders were denoted as work no longer required.

PG&E’s CAP did not provide corrective measures to complete the 95 P2 work orders.

## Energy Safety’s analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

### *Criteria 1: Achievement of Objective*

The delayed mitigation work to address trees identified for priority tree work detracted from PG&E’s ability to reduce wildfire risk as it extended the length of time trees with elevated risk of creating a wildfire threatened PG&E’s facilities. However, the provided information indicates that the risk was minimal because a majority (91%) of the identified tree work was completed on time. Additionally, mitigation work was ultimately completed in 2022 to address all but 95 of the 53,650 trees identified for priority tree work.

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<sup>44</sup> [PG&E’s 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 9

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>45</sup> [Energy Safety’s 2022 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true), p. A-22.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>46</sup> PG&E’s 2022 SVM Audit Corrective Action Plan (August 26, 2024); attachment “DRU14062\_Statement 20\_Atch01\_P1 and P2 Data\_Update\_Redacted.xlsx.”

Regarding the 102 P1 and P2 trees in PG&E's system of record that showed work dates prior to remediation dates, PG&E could not provide Energy Safety with procedures to prevent data from being recorded in this manner moving forward. However, Energy Safety finds PG&E's explanation reasonable because it indicated that the ignition risk posed by the trees with identified priority work were adequately addressed. Energy Safety finds it reasonable that PG&E inputs the tree record data as a secondary action.

Regarding the 157 P1 and P2 work orders with "Null" remediation dates, the updated information provided to Energy Safety in PG&E's CAP indicates that some of the work was performed and or deemed unnecessary upon further inspection. However, mitigation work for 95 P2 trees was still constrained and pending work as of August 26, 2024.<sup>47</sup> The information indicates that the trees were constrained due to pending permit approvals from various agencies. PG&E's CAP did not address how PG&E planned to resolve the constraints associated with the pending P2 work orders.

In conclusion, although PG&E completed the majority of work within the timelines specified in procedure TD-7102P-17, the instances of delayed work detracted from PG&E's priority tree work program's objective of expediting mitigation work to address trees identified with elevated risk of starting a wildfire.

### *Criteria 2: Good Faith Effort*

PG&E's completion of 91% of the work within the timelines specified by PG&E's procedure TD-7102P-17 indicates that PG&E made a good faith effort to follow the procedures of its priority tree work program.

### *Initiative Level Determination*

Energy Safety expects that PG&E will mature its priority tree program by developing procedures to complete tree work in a timely and efficient manner, and by improving its recordkeeping systems to keep accurate data of all priority tree work. However, because PG&E completed 91% of the work within the timelines set by PG&E's procedure TD-7102P-17, and because all but 95 of the priority tree work orders were completed in 2022, Energy Safety finds that PG&E substantially complied with this initiative.

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<sup>47</sup> PG&E's 2022 SVM Audit Corrective Action Plan, attachment; "DRU14062\_Statement 20\_Atch01\_P1 and P2 Data\_Update\_Redacted.xlsx"

### 3.1.4 Initiative 7.3.5.6: Improvement of Inspections

#### 2022 SVM Audit Finding

Energy Safety's 2022 SVM Audit found that PG&E did not provide Pre-Inspection training to six of the 31 Senior Vegetation Management Inspectors (SVMI) hired in 2022. Additionally, as described in PG&E's 2022 WMP Update, PG&E did not complete "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."<sup>48</sup>

#### PG&E's CAP Response

PG&E states in its CAP response that:

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.<sup>49</sup>

Finally, PG&E provided training records indicating that the six SVMI related to the finding were in compliance with the training required for their current roles in 2024.<sup>50</sup>

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<sup>48</sup> [PG&E's 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true), p. 740

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true>, accessed June 12, 2024).

<sup>49</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 10

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>50</sup> PG&E's 2022 SVM Audit Corrective Action Plan, attachment; "DRU14062\_Statement 26\_Atch01\_Training Records\_Redacted.xlsx"



## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

### *Criteria 1: Achievement of Objective*

The objective of this initiative is “identifying and addressing deficiencies in inspections protocols and implementation by improving training and the evaluation of inspectors.”<sup>51</sup> Vegetation Management QA/QC work falls into three groups: Work Verification (WV), Quality Control (QC) and Senior Vegetation Management Inspectors (SVMI). Energy Safety's finding is related to the SVMI. PG&E's CAP indicates that PG&E identified necessary deficiencies and implemented improvements to its training system's record keeping abilities in 2024. However, as detailed in Energy Safety's 2022 SVM Audit, the recordkeeping deficiencies that existed in PG&E's 2022 training system led to PG&E not being able to ensure that six of its SVMI received all required inspection training in 2022. Although Energy Safety cannot verify that this recordkeeping deficiency detracted from the training of PG&E's other QA/QC work groups, the deficiency detracted from PG&E's ability to meet the objective of this initiative. PG&E was unable to ensure that all of its inspectors received adequate training. Additionally, PG&E's decision to not perform post-training audits of its SVMI to assess the SVMI's work also detracted from PG&E's ability to meet the initiative objective of evaluating the work of its inspectors.

### *Criteria 2: Good Faith Effort*

PG&E's poor recordkeeping regarding training programs and PG&E's decision to not complete audits to assess the work of its SVMI did not demonstrate a good faith effort to complete the objective of this initiative in 2022. However, Energy Safety recognizes that the goal of the initiative is to identify and address deficiencies in inspectors and PG&E has stated that it has since made improvements to its MyLearning system which should prevent these deficiencies in future compliance years. Energy Safety will audit these improvements as a part of those compliance cycles.

### *Initiative Level Determination*

As discussed above, the goal of this initiative is to improve the quality of PG&E's vegetation management inspectors. PG&E's stated recordkeeping deficiencies detracted from PG&E's ability to achieve this objective. Without thorough record keeping of inspector training, Energy Safety cannot verify that all of PG&E's inspectors received adequate training that improved the quality of work completed by the inspectors in 2022. Therefore, Energy Safety finds that PG&E did not substantially comply with this initiative. Energy Safety will audit the stated improvements made to PG&E's training system in 2024.

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<sup>51</sup> [Update Guidelines](#), attachment 2, p. 93.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed June 10, 2024).

### ***3.1.5 Initiative 7.3.5.9: Other Discretionary Inspections of Vegetation Around Distribution Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations***

In PG&E's 2022 WMP Update, Initiative 7.3.5.9 directs readers to Initiative 7.3.5.20.<sup>52</sup> Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative. Refer to Energy Safety's analysis of Initiative 7.3.5.20.

### ***3.1.6 Initiative 7.3.5.10: Other Discretionary Inspections of Vegetation Around Transmission Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations***

In PG&E's 2022 WMP Update, Initiative 7.3.5.10 directs readers to Initiative 7.3.5.3.<sup>53</sup> Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative. Refer to Energy Safety's analysis of Initiative 7.3.5.3.

### ***3.1.7 Initiative 7.3.5.11: Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment***

In PG&E's 2022 WMP Update, Initiative 7.3.5.11 directs readers to Initiative 7.3.5.2.<sup>54</sup> Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative. Refer to Energy Safety's analysis of Initiative 7.3.5.2.

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<sup>52</sup> [PG&E's 2022 WMP Update](#), p. 760

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true>, accessed June 12, 2024).

<sup>53</sup> [PG&E's 2022 WMP Update](#), p. 762

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true>, accessed June 12, 2024).

<sup>54</sup> [PG&E's 2022 WMP Update](#), p. 764

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true>, accessed June 12, 2024).

### **3.1.8 Initiative 7.3.5.12: Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment**

In PG&E's 2022 WMP Update, Initiative 7.3.5.12 directs readers to Initiative 7.3.5.3.<sup>55</sup> Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative. Refer to Energy Safety's analysis of Initiative 7.3.5.3.

### **3.1.9 Initiative 7.3.5.13: Quality Assurance / Quality Control of Vegetation Management**

#### **2022 SVM Audit Finding**

PG&E's 2022 WMP Update included a target to complete a defined number of Quality Assurance Audits, and Quality Verification Reviews that would assess the work of its vegetation management programs. The target also set a requirement for PG&E to receive an Acceptable Quality Level (AQL) of 95% from each of the audits and reviews completed. Energy Safety's 2022 SVM Audit found that although PG&E completed all targeted audits, PG&E did not receive a 95% AQL result from three Quality Assurance Audits, and three Quality Verification Reviews. Additionally, PG&E did not include an AQL result for its Transmission & Distribution Line Verification Audit. Energy Safety asked PG&E to provide an AQL result for its Transmission & Distribution Line Verification audit in its CAP.<sup>56</sup>

#### **PG&E's CAP Response**

PG&E stated in its CAP that it "did not achieve the acceptable quality level for VM Distribution, Transmission, or Pole Clearing based on [quality verification] pass rates."<sup>57</sup> PG&E also provided additional information indicating that its 2022 Quality Assurance Vegetation Management Transmission & Distribution Line Verification Assessment audit received an AQL of 88%.<sup>58</sup> PG&E's CAP did not acknowledge the below target AQL results received from its Quality Assurance Audits.

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<sup>55</sup> [PG&E's 2022 WMP Update](#), p. 766

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true>, accessed June 12, 2024).

<sup>56</sup> [Energy Safety's 2022 SVM Audit of PG&E](#), p. A-41.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>57</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](#), p. 11

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true>PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>58</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](#), p. 11

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true>PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

PG&E's CAP also summarized updates made to PG&E's quality management system in 2023. PG&E explained that "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."<sup>59</sup> PG&E also provided a report summarizing its 2023 WMP commitments related to its quality assurance program.<sup>60</sup> The report indicates that in 2023, PG&E committed to "Summarize results and substantiate completion to ensure intended benefits are achieved and appropriately documented in a traceable, verifiable, accurate, and complete manner."<sup>61</sup> The report describes how PG&E determined its sample size for quality assurance work, outlines the scope of each 2023 audit, and provides 2023 audit results. PG&E's CAP also included a summary report indicating that PG&E's 2023 Vegetation Management Distribution, Vegetation Management Transmission, and Vegetation Control Pole Clearing program audits received performance pass rates which exceeded a 95% AQL.<sup>62</sup>

## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

### *Criteria 1: Achievement of Objective*

The objective of this initiative is the "establishment and function of an audit process to manage and oversee the work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes".<sup>63</sup> Although PG&E did not receive its targeted AQL results, PG&E's completion of all targeted audits and reviews indicated that PG&E met the objective of this initiative by implementing a QA/QC program that oversaw the work completed by PG&E's employees and contractors. Additionally, PG&E's 2022 WMP Update stated that PG&E "intend[ed] to take lessons learned from [its] 2022 audits and reviews to inform and improve performance in 2023 if [it is] unable to achieve the 95 percent AQL target."<sup>64</sup> PG&E has implemented practices to improving AQL scores in 2023, demonstrating a commitment to

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<sup>59</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 11

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true>PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>60</sup> PG&E's 2022 SVM Audit Corrective Action Plan, attachment; "DRU14062\_Statement 33\_Atch01\_2023 MIDQM - WMP Commitment submission VM-08.pdf."

<sup>61</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 11

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true>PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>62</sup> PG&E's 2022 SVM Audit Corrective Action Plan, attachment; "DRU14062\_Statement 33\_Atch02\_2023 VM-08 Power BI Dashboards Screen Snippet.pdf," and "DRU14062\_Statement 33\_Atch01\_2023 MIDQM - WMP Commitment submission VM-08.pdf."

<sup>63</sup> [Update Guidelines](#), attachment 2, pp. 93-94.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed June 10, 2024).

<sup>64</sup> [PG&E's 2022 WMP Update](#), p. 732

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true>, accessed August 26, 2024).

improvement over time. The improved 2023 AQL results included in PG&E's CAP indicate that PG&E completed the work described in its 2022 WMP Update, and Energy Safety will evaluate those results in its 2023 Audit cycle. Finally, Energy Safety finds that PG&E's 2022 below target AQL results did not detract from PG&E achieving the objective of this initiative.

#### *Criteria 2: Good Faith Effort*

Despite not meeting the target AQLs in 2022, PG&E conducted audits which found and documented issues in the field as the program intended. PG&E's completion of all targeted audits and reviews, and the development of a corrective action plan for 2023 indicate that PG&E made a good faith effort to achieve this initiative's objective.

#### *Initiative Level Determination*

The objective of the QA/QC program is to identify and address deficiencies in PG&E's vegetation management program. PG&E completed all targeted audits and reviews, and, while it was unable to achieve its AQL goal, PG&E did provide documentation supporting that it implemented corrective actions to improve its AQL results in 2023. These results will be audited in the 2023 Audit cycle but demonstrate a commitment to improvement. Furthermore, PG&E completed all other requirements within this initiative. However, Energy Safety expects that PG&E will continue developing its QA/QC program through the continued improvement of procedures that address deficiencies and improve the quality of work completed by its vegetation management programs. Energy Safety finds that PG&E substantially complied with this initiative.

### **3.1.10 Initiative 7.3.5.14: Recruiting and Training of Vegetation Management Personnel**

The objective of this Initiative is to develop “programs to ensure that the utility can identify and hire qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform vegetation management work, according to the utility's wildfire mitigation plan, in addition to rules and regulations for safety.”<sup>65</sup> This initiative included several activities to achieve this goal including partnerships with educational institutions and establishing a training curriculum on technology and field work. Energy Safety's 2022 Audit found deficiencies in the One VM Tool Training and Environmental Training Course as described below.

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<sup>65</sup> [Update Guidelines](#), attachment 2, p. 94.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed June 10, 2024).



## One VM Tool Training

### 2022 SVM Audit Finding

The 2022 SVM Audit found that only a portion of PG&E's employees and contractors completed One VM Tool training in 2022.<sup>66</sup> This finding was inconsistent with PG&E's 2022 WMP Update language which stated, "As of June 1, 2022, we had made available the following training regarding the One Veg Tool for PG&E employees and contractors with a completion target for all employees and contractors of December 31, 2022."<sup>67</sup>

### PG&E's CAP Response

PG&E stated in its CAP that "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."<sup>68</sup>

PG&E also referred to its response to Initiative 7.3.5.6 of PG&E's CAP which explained that PG&E implemented the MyLearning system in 2024 to better track the completion of trainings by PG&E's employees and contractors.<sup>69</sup>

## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

### *Criteria 1: Achievement of Objective*

Energy Safety finds it reasonable that PG&E only required personnel that used the One VM Tool to complete One VM training. Energy Safety finds that PG&E's decision to only require employees that utilized the One VM Tool to complete One VM Tool training did not detract from PG&E's ability to achieve the objective of this initiative.

### *Criteria 2: Good Faith Effort*

Energy Safety finds that PG&E did not make a good faith effort to meet the requirements as written in PG&E's approved WMP. Energy Safety expects that PG&E will improve its

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<sup>66</sup> [Energy Safety's 2022 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true), p. A-44. (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true, accessed August 26, 2024).

<sup>68</sup> [PG&E's 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true), p. 782 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true, accessed June 12, 2024).

<sup>69</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 10 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=truePG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

communication with Energy Safety regarding changes or clarifications added to its training programs in the future.

### *Sub-Initiative Level Determination*

PG&E met the program objective by ensuring that both employees and contractors tasked with vegetation management responsibilities which utilize the One VM Tool were adequately trained to do so. However, as its program matures, Energy Safety expects that PG&E will improve its communication with Energy Safety regarding changes or clarifications added to its training programs in the future. Energy Safety finds that PG&E substantially complied with this portion of the initiative.

## Environmental Training Updates

### 2022 SVM Audit Finding

Energy Safety's 2022 SVM Audit found that PG&E did not "expand and improve" its VEGM-0302 environmental course to support field crews and tree crews in 2022.<sup>70</sup>

### PG&E's CAP Response

PG&E disagreed with Energy Safety's finding and supplied Energy Safety with supporting documentation indicating that PG&E updated VEGM-0302WBT in calendar year 2022 and provided Energy Safety with an updated version of the VEGM-0302 course which was published in 2023.<sup>71</sup> PG&E also provided a list of other courses that were updated in 2022 that also supported PG&E's field and tree crews.<sup>72</sup>

## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

### *Criteria 1: Achievement of Objective*

Considering the additional documentation provided in PG&E's CAP, Energy Safety finds that PG&E completed the work described in this requirement, and that there were no deficiencies related to this requirement that detracted from PG&E's ability to achieve the objectives of this initiative. The CAP also included improvements published in 2023, which demonstrate on-

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<sup>70</sup> [Energy Safety's 2022 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true), p. A45 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true, accessed August 26, 2024).

<sup>71</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 14 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=truePG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024), and attachment; "DRU14062\_Statement 39\_Atch01\_VEGM-0302 Read Me\_Redacted.pdf."

<sup>72</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 14 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=truePG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024)

going development of PG&E's training program, indicating year-over-year improvements. These improvements will be audited in the 2023 compliance cycle.

### *Criteria 2: Good Faith Effort*

The additional documentation supplied in PG&E's CAP indicates that PG&E performed all the work for this requirement.

#### *Sub-Initiative Level Determination*

The additional information and documentation supplied in PG&E's CAP sufficiently addressed the deficiencies found in the 2022 SVM Audit. For this reason, Energy Safety finds that PG&E substantially complied with this portion of the initiative.

#### *Initiative Level Determination*

Given the additional documentation and clarifications provided in its CAP response for the two deficiencies and the additional work completed as a part of this initiative, including the educational partnerships and courses in strike tree identification and tree crew pre-qualification, Energy Safety finds that PG&E substantially complied with this initiative.

### **3.1.11 Initiative 7.3.5.16: Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment**

In PG&E's 2022 WMP Update, Initiative 7.3.5.16 directs readers to Initiatives 7.3.5.2 and 7.3.5.3.<sup>73</sup> Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative. Refer to Energy Safety's analysis of Initiatives 7.3.5.2 and 7.3.5.3.

### **3.1.12 Initiative 7.3.5.17: Substation Inspections**

The objective of this initiative is "inspection of vegetation surrounding substations, performed by qualified persons and according to the frequency established by the Utility, including record-keeping."<sup>74</sup> The initiative included three sub-initiatives, including defensible space inspections around transmission substations, inspections around distribution substations, and inspections around hydro substations and powerhouses. The first two sub-initiatives are taken together in the first section below and the third sub-initiative is considered in the second section below. In both cases, Energy Safety finds that PG&E

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<sup>73</sup> [PG&E's 2022 WMP Update](#), p. 786

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed June 10, 2024).

<sup>74</sup> [Update Guidelines](#), attachment 2, p. 94.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed June 10, 2024).

supplied additional documentation to demonstrate that it substantially complied with this initiative.

## Substation Defensible Space Inspections

### 2022 SVM Audit Finding

Energy Safety's 2022 SVM Audit found that PG&E did not complete all targeted defensible space inspections of its transmission and distribution substations within the 2022 SVM compliance year, nor did PG&E state in its 2022 WMP Update that it intended to complete a portion of the work in 2021.<sup>75</sup>

### PG&E's CAP Response

PG&E agreed with Energy Safety's finding and stated in its CAP that in 2022, substation defensible space inspections were based on Procedure LAND-4001P-01, which defined the inspection timeframe from November 15, 2021, to May 31, 2022. PG&E further explained that this timeframe was used because it aligned with start dates for other VM initiatives.<sup>76</sup>

Additionally, PG&E explained that "[Procedure] 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."<sup>77</sup> PG&E also stated that "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."<sup>78</sup> PG&E provided a copy of Procedure LAND-5201P-01, published on November 9, 2023, which states that all defensible space substation inspections are to be completed "by end of calendar year as committed in the Wildfire Mitigation Program."<sup>79</sup>

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<sup>75</sup> [Energy Safety's 2022 SVM Audit of PG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true), pp. A-50 to A-51

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>76</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 15

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true>PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>77</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 15

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true>PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>78</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true), p. 15

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true>PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>79</sup> PG&E's 2022 SVM Audit Corrective Action Plan, attachment; "DRU14062\_Statements 45 & 47\_Atch01\_7.3.5.17\_LAND-5201P-01 rev3\_110923\_Redacted.pdf."

## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

### *Criteria 1: Achievement of Objective*

In its CAP response, PG&E clarified that it mirrored the timeframe of defensible space inspections with LIDAR and transmission inspections to improve efficiency. Energy Safety finds this explanation to be reasonable and that the nonconformance with a calendar year did not detract from PG&E's ability to achieve the objective of this initiative. PG&E's CAP also indicates that it has implemented practices to better conform with its 2023-2025 WMP, demonstrating program maturity. Energy Safety will audit these practices in the 2023 compliance year. Ultimately, Energy Safety finds that PG&E completed all the work in this initiative.

### *Criteria 2: Good Faith Effort*

Because PG&E ultimately did complete the inspections, though outside the compliance timeframe, and developed program improvements to align with the timeframes in its 2023-2025 WMP, Energy Safety finds that PG&E made a good faith effort to complete the requirements of its substation defensible space inspection program.

### *Sub-Initiative Level Determination*

Because PG&E completed all targeted substation defensible space inspections, and its CAP indicated that PG&E has implemented practices to better conform with its 2023-2025 WMP, demonstrating program maturity, Energy Safety finds that PG&E substantially complied with this portion of the initiative.

## Prioritization of Hydro Substation and Powerhouse Inspections

### 2022 SVM Audit Finding

Energy Safety's SVM Audit was unable to verify that PG&E prioritized power generation hydro substations and powerhouses inspections based on elevation and annual fuel growth.<sup>80</sup>

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<sup>80</sup> [Energy Safety's 2022 SVM Audit of PG&E](#), pp. A-53

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

## PG&E's CAP Response

PG&E disagreed with this finding and its CAP response included an Excel file with additional substation site information including the elevation designation of each site (High/Low) as well as each site's priority (1<sup>st</sup> or 2<sup>nd</sup>).<sup>81</sup>

## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

### *Criteria 1: Achievement of Objective*

With the additional information, Energy Safety was able to verify that PG&E prioritized inspections at Power Generation Hydro Substations and Powerhouses at sites at lower elevation with faster growing vegetation first. Thus, Energy Safety finds that PG&E performed all the work for this requirement.

### *Criteria 2: Good Faith Effort*

The additional information supplied in PG&E's CAP indicates that PG&E performed all the work for this requirement.

### *Sub-Initiative Level Determination*

Because PG&E was able to provide additional information showing that it prioritized its inspections based on elevation and annual fuel growth, Energy Safety finds that PG&E substantially complied with this portion of the initiative.

### *Initiative Level Determination*

Because PG&E ultimately completed all targeted defensible space inspections, indicated in its CAP that it has implemented practices to better conform its substation defensible space inspection cycles with its 2023-2025 WMP, and was able to provide additional documentation supporting that it completed all requirements related to its hydro substation and powerhouse inspection work, Energy Safety finds that PG&E substantially complied with this initiative.

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<sup>81</sup> PG&E's 2022 SVM Audit Corrective Action Plan response; attachment "DRU14062\_Statement 49\_Atch01\_7.3.5.17\_2022 Tracker REV for WMP.xlsx."



### **3.1.13 Initiative 7.3.5.18: Substation Vegetation Management**

In PG&E's 2022 WMP Update, Initiative 7.3.5.18 directs readers to Initiative 7.3.5.17<sup>82</sup>. Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative. Refer to Energy Safety's analysis of Initiative 7.3.5.17.

### **3.1.14 Initiative 7.3.5.20: Vegetation Management to Achieve Clearances Around Electric Lines and Equipment**

#### **2022 SVM Audit Finding**

Energy Safety's 2022 SVM Audit found that PG&E only partially cleared 2,099 of the poles PG&E counted towards its 7,000 pole Utility Defensible Space (UDS) pole clearing target.<sup>83</sup>

#### **PG&E's CAP Response**

PG&E disagreed with Energy Safety's finding and stated that "the UDS program is not a regulatory requirement."<sup>84</sup> Further, PG&E stated that "the work completed to the UDS scope per the program standards, including partial clearing due to external factors [e.g. difficult access, environmental protection, landowner refusal] all resulted in modification of fuels as intended to reduce the potential for rapid fire spread near PG&E assets."<sup>85</sup>

Finally, PG&E stated that "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... 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."<sup>86</sup>

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<sup>82</sup> [PG&E's 2022 WMP Update](#), p. 802

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed June 10, 2024).

<sup>83</sup> [Energy Safety's 2022 SVM Audit of PG&E](#), p. A-57

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

<sup>84</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](#), p. 17

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>85</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](#), p. 17

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

<sup>86</sup> [PG&E's 2022 SVM Audit Corrective Action Plan](#), p. 17

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57252&shareable=true> PG&E 2022 SVM Audit Corrective Action Plan, accessed August 26, 2024).

## Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

### *Criteria 1: Achievement of Objective*

As stated in the 2022 WMP Update, the purpose of this initiative is “identifying and discussing additional vegetation management actions (e.g., trimming and removal of vegetation) taken beyond the minimum regulatory requirements and recommendations.” Therefore, PG&E’s CAP response indicating that this is not a “regulatory requirement” is true but irrelevant as the Audit addresses the language of the WMP, not regulations. Regardless, considering that the partially cleared poles had associated “external factors” that were well documented by PG&E, Energy Safety finds that PG&E met the objective of its UDS pole clearing program overall through a combination of work completed under this initiative and work completed under Initiative 7.3.5.2. Furthermore, Energy Safety recognizes that this program is a complement to PG&E’s pole clearing program, which is a more effective program overall at achieving the objective of this initiative and contributed to the reduction of ignition risk across PG&E’s electric system.

### *Criteria 2: Good Faith Effort*

As detailed in Energy Safety’s 2022 SVM Audit, PG&E’s UDS pole clearing work records indicate that external factors such as “environmental protection,” “landowner refused,” and “difficult access” were associated with all UDS work that received partial clears.<sup>87</sup> Because this work was complemented by other work completed in initiative 7.3.5.2, and the partial clearance work reduced wildfire risk, Energy Safety finds it reasonable that PG&E did not attempt to resolve the external factors cited in its CAP. Therefore, Energy Safety finds that PG&E made a good faith effort to complete all work but was limited by factors outside of PG&E’s control.

### *Initiative Level Determination*

Energy Safety finds that PG&E performed all the work in PG&E’s 2022 WMP Update and fully documented when constraints occurred and finds that PG&E substantially complied with this initiative.

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<sup>87</sup> [Energy Safety’s 2022 SVM Audit of PG&E](#), p. A-57

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57083&shareable=true>, accessed August 26, 2024).

## 3.2 Programmatic Assessment

Energy Safety's Audit document, dated July 26, 2024, found that PG&E completed all work in 6 of the 21 initiatives in its 2022 WMP Update and was deficient in 15. PG&E's CAP response, dated August 26, 2024, sufficiently addressed 10 of these 15 by supplying additional documentation which demonstrated that either PG&E completed all or the majority of the work, or that PG&E completed other work within the initiative that overlapped with the deficiency and achieved the same program objective.

However, Energy Safety has identified systemic recordkeeping and documentation issues within several of its SVM programs that led to the initial Audit findings. While PG&E was able to provide some documentation or otherwise demonstrate that it was able to perform the majority of the work for most of the initiatives with recordkeeping deficiencies, it did result in noncompliance for one initiative. PG&E lost track of its training requirements thereby failing to adequately train all inspectors. In its CAP response, PG&E has indicated that it has begun to implement programs that will improve recordkeeping for several initiatives, including training. Energy Safety recognizes this effort and expects that PG&E will continue to expand these improvements in initiatives that fell short of completion as noted above. Energy Safety will audit these practices in future compliance years.

The remaining four Initiatives that did not comply with the 2022 WMP Update language were all related to the same failure to complete one of PG&E's three vegetation management programs. PG&E must continue to improve its planning process to ensure all work in their WMP is completed and provide Energy Safety both notification of and justification for changes when needed. Overall, PG&E has completed the majority of the work described in its 2022 WMP Update and where it has fallen short, it has identified deficiencies in its program and begun to take actions to correct these deficiencies. Therefore, Energy Safety finds that programmatically, PG&E performed the large majority of the work described in its 2022 WMP Update.

## 4. Conclusion

As discussed at length in the preceding sections, in 2022 PG&E's vegetation management program suffered from significant shortfalls that compromised its ability to reduce risk. Nonetheless, based on the analysis discussed in Section 3 and a strict reading of its 2022 WMP Update, Energy Safety concludes that PG&E substantially complied with the substantial portion of the vegetation management requirements in its 2022 WMP Update.

# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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