

November 1, 2024

OFFICE OF ENERGY INFRASTRUCTURE SAFETY OF THE CALIFORNIA NATURAL RESOURCES AGENCY

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

Pacific Gas and Electric Company (PG&E) respectfully submits this Quarterly Notification detailing: (1) the status of our current Wildfire Mitigation Plan (WMP); (2) recommendations of the most recent safety culture assessment; (3) recommendations of the Board of Directors’ safety committee meetings that occurred during the quarter; and (4) a summary of the implementation of any safety committee recommendations from the previous quarterly submittal. This Quarterly Notification is provided pursuant to California Public Utilities Code (PUC) Section 8389(e)(7), the Office of Energy Infrastructure Safety’s (Energy Safety) Compliance Operational Protocols, issued on February 16, 2021 (Compliance Operational Protocols) and subsequently clarified on September 8, 2021 by Energy Safety, and the 2024 Safety Certification Guidelines issued on June 19, 2024.<sup>1</sup>

**Background**

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

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

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

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

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

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

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

This Quarterly Notification submission provides the requested information for the third quarter (Q3) of 2024, pursuant to the above-identified guidelines from Energy Safety and statutory requirements.

### **Q3 2024 Update**

### **WMP Regulatory Background and Scope of Quarterly Notification**

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

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<sup>2</sup> PG&E's 2023-2025 WMP is available at: [www.pge.com/wildfiremitigationplan](http://www.pge.com/wildfiremitigationplan).

We submitted our 2024 Change Order on January 8, 2024. The Change Order requested updates to some programs and targets for the 2024 year. Energy Safety issued a decision on May 31, 2024, approving 11 of the 19 requested changes. As a result, we updated our commitments based on Energy Safety’s decision. On August 29, 2024, we received a draft decision from Energy Safety approving our 2025 WMP Update.

Table 1 of our Q3 2024 QDR, which is being submitted concurrently with this Quarterly Notification, provides progress updates for our 47 initiative commitments, which include both targets and objectives.<sup>3</sup> This Quarterly Notification provides additional details associated with these initiative commitments.

**2024 WMP Initiative Commitment Summary**

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

**Table 1: Summary of 2024 WMP Initiative Commitments**

2023 WMP Category	Completed	In Progress	Planned	Delayed	Total
A. Situational Awareness and Forecasting	1	2	0	0	3
B. Grid Design, Operations and Maintenance	9	10	0	0	19
C. Vegetation Management and Inspections	9	8	0	1	18
D. Public Safety Power Shut off	0	3	0	0	3
E. Emergency Preparedness Plan	0	2	0	0	2
F. Community Outreach and Engagement	1	1	0	0	2
<b>Total</b>	<b>20</b>	<b>26</b>	<b>0</b>	<b>1</b>	<b>47</b>

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

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

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

- VM-06 (Defensible Space Inspections - Transmission Substation): Our 2024 Change Order request to change the target for this work from 55 to 54 was denied by Energy Safety on procedural grounds. The reduction in the target is the result of a transfer in ownership of one of the substations. As a result, we will not be able inspect 55 substations and will provide transfer documentation during the compliance process as evidence. Inspections of all the remaining substations were completed by the end of Q2. We list this target as 'Completed' in our QDRs.
- VM-07 (Defensible Space Inspections - Hydroelectric Substations and Powerhouses): Our 2024 Change Order request to lower the target for this work from 61 to 59 was denied on procedural grounds. The reduction in the target is the result of a transfer in ownership of two of the substations. As a result, we will not be able to inspect 61 substations and will provide transfer documentation during the compliance process as evidence. Inspections of all the remaining substations were completed by the end of Q2. We list this target as 'Completed' in our QDRs.
- VM-17 (Distribution Second Patrol): When creating our workplan for 2024, our GIS pull yielded only 25,485 miles, slightly lower than the 2024 WMP target of 25,685 miles. We note that this target was provided as a forecast in 2023 and represented an estimate. Since we will not be able to meet the forecasted end-of-year target, we will provide documentation for the discrepancy in mileage during the compliance process. We are currently listing this target as 'In Progress' in the Q3 QDR.
- VM-18 (VM for Operational Mitigations (VMOM)): Our initial find rate for this work was projected to be 15 trees per mile, but the actual find rate came in much lower at seven trees per mile. Given this lower actual find rate, in Q2 we forecasted having 5,476 trees to mitigate, as compared to the initial WMP target of 6,500 trees. As a result, in Q2 we stated that we will not be able to meet the initially forecasted annual target of 6,500 trees but that we would still perform work on 45 circuit protection zones, totaling approximately 729 miles. However, during Q3, we pulled forward work that was previously allocated for 2025 in to 2024. This allows us to accelerate the program and will enable us to meet 2024 target of 6,500 trees. Thus, we are currently listing this Target as 'In Progress' in the Q3 QDR.

### **Details on the Delayed Initiative Commitment**

In this section, we provide information regarding the initiative commitments that were designated as "Delayed" as of the end of Q3. In Table 7-3-1 and Table 7-3-2 of the WMP, we provided a Unique ID for each initiative commitment.<sup>5</sup> Below, we included the Unique ID, the name of the activity, a brief description of the activity, and the status.

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<sup>5</sup> PG&E 2023 WMP R6 at pp. 289, 334.

For the one initiative that is currently behind schedule, we implemented catch back plans and forecast dates for when we anticipate the commitment to be back on track to the original plan.

### **VM-22 Vegetation Management – Quality Control**

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

This initiative consists of three separate tranches of work. Of these three, the program is ahead of target in two of the three areas: Distribution (with a year-to-date 97.11% pass rate against the target of 88%) and Transmission inspections (with a year-to-date 98.95% pass rate against the target of 92%). However, the third area, Vegetation Pole Clearing program, is behind the targeted pass rate of 88% with a year-to-date pass rate of 87.05% (Q3 pass rate is 92.21%). To get back on track we are taking the following steps:

- 1) Performing data pulls of potential locations and tailboard crew on importance of correctly updating record.
- 2) Continually tail-boarding the newly created 5-minute meeting about stumps; and
- 3) Tail-boarding with individuals on specifically identified issues to close the gap.

With these corrective actions, the program anticipates being back on track and meeting the target by October 31, 2024.

### **Implementation of PG&E's Latest Safety Culture Assessment**

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

1. PG&E should strengthen its safety communications by improving safety-related communication, addressing worker concerns about the lack of easy access to information on near misses and information on wildfire conditions, and providing leadership listening sessions.
2. PG&E should optimize its safety-enabling systems to improve the quality of event investigations and improve the hazard and near-miss reporting process to align expectations on what to report and when to report. PG&E should also continue to take steps to increase workers' psychological safety, building confidence in their speak-up and stop-the-job authority.
3. PG&E should continue building on its current worker training plan by:
  - Incorporating new safety-related training modalities. This should include more hands-on training and topics that enable all levels of the organization to

- develop a more proactive and curious mindset. It should also include assessing participant feedback and using it to make training more effective, relevant, and engaging.
- Conducting post-training peer learning activities. This should include group discussions. PG&E should also cultivate a mentoring program and/or encourage the appointment of a senior team member to be a “safety steward”—someone experienced who can be an effective communicator about responding to real-life situations that involve judgement calls in the field that are not covered by standard policies or procedures.
4. PG&E should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.

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

During Q3 2024, some of the actions PG&E completed to advance the implementation of the recommendations from the 2023 Energy Safety Culture Assessment include:

- Pursuant to recommendation #1:
  - PG&E awarded recognition to coworkers who demonstrated proactive safety behaviors via coworker nominations submitted to the Enterprise Safety Recognition Program. Examples of behaviors that warrant recognition include, serving as a conduit for speaking up, stopping work when unsure of hazards or tasks (or if unsafe conditions exist) and ensuring that everyone understands how to do work safely before starting the job. We expect this program to support the following:
    - Enhanced safety culture;
    - Improved safety performance by reinforcing risk identification and controls and reducing injuries; and
    - Increased joy at work among those that recognize others, as well as those that are recognized.
  - Field-facing workshops on safety engagements were conducted by the Functional Area Operations leaders.
  - A series of Corrective Action Program roadshow events were hosted to empower coworkers to identify, evaluate, track and resolve safety issues.
  - Senior leadership conducted bi-monthly “go-see” opportunities where they engage with frontline coworkers at service centers to discuss what is working well and where they need leadership help and support.
  - Wildfire learning sessions were conducted for coworker’s continued awareness and education on risks and actions the company takes to

prevent them. Wildfire safety awareness was also communicated via daily safety messages including good catches and safety recognition for coworkers who took proactive measures to prevent potential wildfires or helped extinguish a brush fire.

- Pursuant to recommendation #2:
  - The Enterprise Cause Evaluation team completed assessments of three of PG&E's major functional areas including Power Generation, Electric Operations and Gas Operations to evaluate their adherence to PG&E's published causal evaluation standard and procedures in completing cause evaluations as part of the greater corrective action program. The objective of this work is to ensure that procedures are followed and that the cause evaluations for serious safety incidents are documented to a consistent standard, ensuring that learning opportunities are adequately captured. It is anticipated that this will yield insights into improvements in training and process management in the future.
  - The Enterprise Cause Evaluation team also completed a review of cause evaluations of serious safety incidents conducted in the first half of 2024 using the quality rubric that was developed in Q2 of 2024. The objective was to assess the skills of the cause evaluators based on how well the cause evaluations were documented. Special attention was paid to how the issue was documented, effective use of analysis tools to arrive at causes supported by evidence, corrective actions to address those causes and effectiveness review plans to assess how effective they were. Point values were assigned based on the rubric and feedback was shared with the various cause evaluation teams in PG&E highlighting strengths, opportunities, and performance gaps.
  - In Q3, the Near Hit program focused efforts to provide information about specific Near Hits as well as where additional Near Hit information can be found. This included:
    - Specific Near Hits in enterprise communications, with program links embedded for coworkers to easily access additional information;
    - Enterprise Near Hit Program messaging highlighting the Near Hit Dashboard, the Near Hit Central website, guides on sharing a Near Hit and library of previously featured Near Hits; and
    - Increased functional area Near Hit sharing utilizing Near Hit ReCaps, Third Thursday Tool Kits, and Regional Safety Director communications.
  - In September, a third enterprise Safety Week was held and focused on the PG&E Safety Excellence Management System (PSEMS). Topics included coworker's collective ownership of safety and introducing them to a few key elements of PSEMS, namely leadership, commitment and

engagement, operational control, and assurance. Weekly learning sessions followed Safety Week that are presenting the remaining ten PSEMS elements and how they relate practically to the work PG&E performs.

- PG&E experienced an 11% Corrective Action Program (CAP) issue initiation rate increase from September 2023 to September 2024 demonstrating the ongoing viability of and support for the program.
- PG&E continues to execute the Enterprise wide Speak-up Awards program with 2024 being our eighth annual recognition event. In 2023, the program received 60 nominations and grew to 94 nominations for 2024.
- PG&E's Diversity, Equity, Inclusion and Belonging (DEIB) Champions across functional areas continued to promote psychological safety with their teams through hosting webinars, team activities, and community events, and leading by example in meetings. Leaders hosted interactive engagement sessions with coworkers on the topics of trust and psychological safety.
- PG&E's Diversity, Equity, Inclusion and Belonging (DEIB) leaders held monthly sessions on various psychological safety topics including trust, speaking-up, and conflict management.
- Enterprise Health and Safety worked with leaders in Emergency Management to benchmark a new Critical Incident Stress Management (CISM) program and hired a Program Manager to help develop the program that will include peer volunteer support of our coworkers in the event of a crisis.
- Pursuant to recommendation #3:
  - In mid-September, a team of Safety Culture Coaches started working with PG&E Operations to integrate best practices from Edison Electric Institute and existing fatality prevention strategies. The program's objectives are to improve the following:
    - i. frontline coworker and leader safety interactions;
    - ii. trust and speak-up culture;
    - iii. knowledge and use of the SIF Capacity and Learning Model;
    - iv. ability to proactively identify and present unsafe practices or conditions; and
    - v. frontline engagement and positive impact on safety.



- Coaches work daily with frontline teams and provide weekly summaries of their interactions back to the teams, directors, and senior directors. Themes from these engagements are used to continuously refine the coaching methodology, improve PG&E's safety culture, and enhance SIF prevention efforts.
- PG&E continues to expand training modalities and increase hands-on training for employees. The summary below includes key training statistics through Q3 2024:
  - i. 46,504 employees and contractors completed PG&E training;
  - ii. 1,030,720 hours of PG&E training completed;
  - iii. 28% was web-based training (WBT) conducted through a work computer or mobile device;
  - iv. 71% was hands-on instructor-led training; and
  - v. Hands-on instructor-led training hours increased 9% when comparing Q1 to Q3 2024 to the same period in 2023.
- PG&E continues to reduce Web Based Training (WBT) and increase hands-on, skill-based training by performing difficulty-importance-frequency analyses and adjusting non-compliance WBT frequencies as appropriate. In 2024, this effort has resulted in over 11,000 hours of WBT reduction and a 3.6% reduction in total number of WBTs completed by employees when comparing Q1 to Q3 2024 to the same period in 2023.
- In addition to the 30 formal apprenticeship programs, PG&E continues to expand hands-on refresher training focused on improving employee performance and safety. As of October 2024, the initial rollout of grounding refresher training for electric operations is complete, with nearly 1,800 electric operations employees trained. Controller training for electric operations was implemented starting in August, with more than 1,400 coworkers in electric operations targeted for the training. Excavation safety competent person training has been updated based on updates to the Excavation Safety Manual, and the training update to the field is being delivered by Field Safety Specialists to more than 1,800 coworkers.
- PG&E's Public Safety Power Shutoff (PSPS) team conducted PSPS training sessions for targeted coworkers.
- PG&E Academy collects feedback from coworkers about training through multiple channels including post-training surveys, post-pilot feedback, training alignment and apprenticeship committees, and through PG&E's Corrective Action Program. The Academy reviews this feedback and makes the appropriate updates to training during the training's regular

maintenance cycle or as a part of break-in work as needed. Additionally, PG&E uses the Kirkpatrick Model to assess training effectiveness, primarily through Level 1 (Student Satisfaction) and Level 2 (Knowledge and Skill Transfer) evaluations. Selected courses also include Level 3 (On-the-Job Application) and Level 4 (Business Impact) evaluations. We use results of these training effectiveness evaluations to continuously improve training.

- Pursuant to recommendation #4:
  - Corporate Security hired three more Investigator positions, which is a 40% increase in staff, dedicated to the field security/safety of Vegetation Management and other Electric Compliance teams. These resources have completed onboarding training and are now deployed in the field supporting daily operations.
  - Corporate Security provides LiveSafe Training, de-escalation training coordinated with Grassroots Safety, and virtual reality training to employees. Over 600 coworkers have already completed the virtual reality training.
  - Corporate Security Communications recently completed the training of 455 front line personnel to help deliver future security tool kit training. The kit contains an overview on security and information on situation awareness, cyber awareness, and the importance of locking up assets.
  - PG&E Corporate Security partnered with Kaiser Permanente, Clorox, Blue Shield, and the Oakland Police Department (OPD) to make the downtown area safer for all the companies and community. All four companies paid for extra OPD patrol officers for the downtown area which resulted in a decrease in crime of 68% in 2024 in comparison to 2023.

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

### **Board of Directors' Safety and Nuclear Oversight Committee – Q3 2024 Update**

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

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

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

2) Recommendations of the SNO Committees and Management Implementation.

**Safety Topics Covered in SNO Committee Meetings**

During the third quarter, the SNO Committees held both a joint meeting with the Audit Committees and a stand-alone meeting on September 17, 2024.

During the September joint meeting, the SNO and Audit Committees reviewed the Ethics and Compliance program and received a wildfire update. The Committees also reviewed high hazard benchmarking and discussed technology in safety.

During the September stand-alone meeting, the SNO Committees received an update on aviation safety and business continuity. The Committees also reviewed safety performance, including nuclear safety. The Committees discussed risks associated with failure of electric distribution overhead assets, public contact with energized electric equipment, and cybersecurity.

**Recommendations of Boards of Directors' Safety Committee Meetings During Q3 2024**

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

- Consider assessing the risk of battery storage as it relates to corporate and enterprise risk; and
- Consider including near misses as a leading indicator for workforce safety exposure.

**Management Implementation of Recommendations Described in Q3 2024 Quarterly Notification**

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

Recommendation # 1: Many organizations do not have a consistent definition of essential functions. Therefore, a recommendation was made to consider running business continuity exercises so that responders are familiar with the rank of priorities of essential functions and will be well-practiced and ready to respond in an actual event.

Management's response: In partnership with each Functional Area, EP&R ensures all 65 Business Continuity Plans (BCP) are exercised annually. Along with scheduled exercises, many plans, or parts of plans, are activated each year when technology is unavailable as a result of an outage or planned maintenance. Each Functional Area has

a Business Continuity Coordinator who works in partnership with EP&R to ensure all BCPs are annually reviewed and updated, then approved by the Functional Area's Officer. To ensure interdependence and strengthen our Business Continuity program, EP&R facilitates a monthly Business Continuity Executive Steering Committee with Functional Area Senior Leadership.

Recommendation # 2: A recommendation was made to consider using drones for situations beyond the visual line of sight while performing gas leak detection surveys.

Management's response: Currently, PG&E's Leak Management does not use drones for leak survey Beyond Visual Line of Sight (BVLOS). PG&E's Unmanned Aviation Services (UAS) Operations have the processes in place to acquire onsite and remote waivers for BVLOS UAS operations. PG&E's Leak Management, Aviation Services, Gas Methods and Procedures (M&P), and Research and Development (R&D) have tested various drone-mounted methane sensors for aerial leak detection and will continue to do so as they become available on the market.

Currently, PG&E is using drone-mounted methane sensors for submerged transmission waterway crossings (approximately 120 crossings), which has been accepted by the Pipeline and Hazardous Materials Safety Administration (PHMSA), and the Safety Enforcement Division of the California Public Utilities Commission as an approved technology and survey method. This is an active program designed to keep employees safe by eliminating the need for employees to navigate waterways with boats and other methods and to keep employees out of traffic on bridge crossings. We are exploring with R&D other methods for consideration for submerged transmission waterways.

On September 17 and 18, 2024, PG&E's Leak Management M&P, UAS, and R&D teams evaluated additional drone sensors in the field to see if they meet our requirements for use. On October 9, 2024, Leak Management traveled to meet with Southern California Gas to learn about their drone leak detection program.

Our plan is to continue expanding our drone leak detection program as improved technologies meet our desired requirements and risk assessments are completed. We are waiting for the final Notice of Proposed Rulemaking (NPRM) from PHMSA to publish the requirements and ranges of the leak detection thresholds for the sensors. The expected publication date is in the first quarter of 2025. The PHMSA decision on the NPRM will dictate parameters for leak threshold. After PHMSA releases the minimum leak sensitivity thresholds for aerial leak detection, we will decide on a sensor based on the results of our previous and current planned testing.

## **Conclusion**

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

November 1, 2024

Sincerely,

                  /S/                    
Meredith Allen  
Vice President, Regulatory Affairs

Appendix 1 - 2024 WMP Initiative Commitments

cc: Service Lists I.19-09-016, I.15-08-019, R.21-10-001, and R.18-10-007

**APPENDIX 1: 2024 WMP Initiative Commitments**

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

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

Plan Area	2024 WMP Commitments – Continued			
<b>C. Vegetation Management and Inspection</b>	VM-01 - LiDAR Data Collection - Transmission	VM-02 - Pole Clearing Program	VM-03 - Focused Tree Inspection Program	VM-04 - Tree Removal Inventory
	VM-05 - Defensible Space Inspections - Distribution Substation	VM-06 - Defensible Space Inspections - Transmission Substation	VM-07 - Defensible Space Inspections - Hydroelectric Substations and Powerhouses	VM-08 - Vegetation Management – Quality Verification
	VM-13 - Routine Ground - Transmission	VM-14 - Transmission Second Patrol	VM-15 - Integrated Vegetation Management - Transmission	VM-16 - Distribution Routine Patrol
	VM-17 - Distribution Second Patrol	VM-18 – VM for Operational Mitigations (VMOM)	VM-19 – One VM Application Record Keeping Enhancement (Routine, Second Patrol)	VM-20 – Record Keeping Enhancement (VMOM)
	VM-21 - FTI Record Keeping Enhancement	VM-22 - Vegetation Management – Quality Control		
<b>D. Public Safety Power Shut off</b>	PS-06 - Provide batteries to PG&E customers	PS-07 - PSPS Customer Impact Reduction	PS-11 – Pilot using drones for PSPS restoration	
<b>E. Emergency Preparedness Plan</b>	EP-01 - Complete PSPS and Wildfire Tabletop and Functional Exercises	EP-06 - Review, and revise the CERP and 2 Wildfire Related Annexes on a yearly basis		
<b>F. Community Outreach and Engagement</b>	CO-01 - Community Engagement – Meetings	CO-02 - Community Engagement - Surveys		