

February 3, 2025

# OFFICE OF ENERGY INFRASTRUCTURE SAFETY OF THE CALIFORNIA NATURAL RESOURCES AGENCY

<u>Subject:</u> 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); culture (2) recommendations of the most recent safetv assessment: (3) recommendations of the Board of Directors' safety committee meetings that occurred during the guarter; 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

<sup>&</sup>lt;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.

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.

This Quarterly Notification submission provides the requested information for the fourth quarter (Q4) of 2024, pursuant to the above-identified guidelines from Energy Safety and statutory requirements.

# Q4 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.

We also 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. 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. The most recent version of our Base WMP (R7) was submitted on December 6, 2024, at the direction of Energy Safety.

<sup>&</sup>lt;sup>2</sup> PG&E's 2023-2025 WMP is available at: <u>www.pge.com/wildfiremitigationplan</u>.

Table 1 of our Q4 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>

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

## Table 1: Summary of 2024 WMP Initiative Commitments

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

• 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 this target is due to a transfer in ownership of one of the substations. As a result, we were not able to inspect 55 substations and will provide transfer documentation during the compliance process as evidence for the transferred location. Inspections of the

<sup>&</sup>lt;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>&</sup>lt;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.

remaining 54 substations were completed by the end of Q2. We list this target as completed due to 100% of the scope of this work being achieved.

- 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 this target is due to a transfer in ownership of two of the substations. As a result, we were not able to inspect 61 substations and will provide transfer documentation during the compliance process as evidence for the two transferred locations. Inspections of the remaining 59 substations were completed by the end of Q2. We list this target as completed due to 100% of the scope of this work being achieved.
- 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 of the expected number of miles. The data was pulled from our GIS system as a snapshot in time, prior to inspections beginning. In our Q3 QN, we explained that we anticipated not being able to meet the forecasted end-of-year target and would provide documentation for the discrepancy in mileage during the compliance process. However, in Q4 we were able to exceed the original forecast for this commitment because, as inspections were performed, the team validated and documented mileage inspected through the OneVM system. The discrepancy between the original forecast and mileage inspected is attributed to the timing of the data pull versus the timing of inspections performed. The inspections performed reflect mileage in the field at the time of inspection, which are sometimes greater than originally estimated due to new construction, movement of distribution overhead lines, or because of differences between how OneVM and GIS calculates mileage. Through these inspections, the team completed 27,504 miles of inspections, which exceeded the annual WMP target of 25,685 miles.
- 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 anticipated 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 were able to pull forward work that was previously allocated for 2025 into 2024. This allowed us to accelerate the program and meet the 2024 target of 6,500 trees worked. In total, we were able to mitigate 6,937 trees and exceeded the target for this year.

## 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.
- 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 we agreed to implement all the findings and recommendations identified in the Safety Culture Assessment.

During Q4 2024, some of the actions PG&E completed to advance the implementation of the recommendations from the 2023 Energy Safety Culture Assessment include:

- Pursuant to recommendation #1,
  - o Improving Safety Related Communications:
    - Daily safety messages, the Safety Snapshot and Daily Digest articles continued to focus on enterprise safety and health programs and included psychological safety, driving safety, monthly ergonomic

webinars, near hits, and safety recognition. These messages are sent to all coworkers in the Daily Safety Update email and discussed in their team's Daily Operating Reviews throughout the company. The messaging reinforces the importance of and recognizes coworkers for speaking up for safety and having the confidence to exercise their responsibility to "Stop the Job" when unsafe or potentially unsafe conditions are observed. Additionally, PG&E utilizes several communication platforms including videos, in-person and remote discussions with coworkers.

- o Ease of access to near hit information:
  - Near hits are discussed in daily operating reviews throughout the company. Lessons learned from past Near Hit events are presented in videos, Initial Incident Reports, Safety Flashes, and all-hands calls.
  - A Near Hits webpage was created and promoted in the Daily Safety Update with a link that is easily accessible. The previous week's medium- and high-rated Near Hits are attached to the Daily Safety Update for ease of access to this information.
  - Daily Digest articles featured Near Hits with company-wide relevance and presented learnings for all coworkers to apply to prevent safety incidents.
  - Over 100 Enterprise Near Hit messages and features were communicated via enterprise daily updates, company news bulletins and weekly safety updates. These communications included specific Near Hits in enterprise communications, with program links for coworkers to access additional program information. They also included the Near Hit Dashboard, the Near Hit Central Website, howto guides and a library of featured Near Hits.
- o Ease of access to wildfire conditions:
  - We utilize two methods to notify people of hazardous wildfire conditions, they are:
    - the Hazard Awareness Warning Center (HAWC) communication tool, Everbridge, which pushes emails out to all coworkers, and
    - the Livesafe App, which has geotagging of hazards, alerts coworkers as they travel throughout the territory.
  - Additionally, PG&E provides information on wildfire conditions during weekly Situational Awareness calls, all-hands meetings, and the Daily Digest newsletter, which all coworkers have access to.
  - Wildfire safety messages (beyond the Fire Protection Index) were shared in Daily Safety Updates and discussed in daily operating reviews throughout the company.

The Wildfire Mitigation Program team held monthly Leadership Listening Sessions in 2024.

- o Provide leadership listening sessions:
  - Executive leaders engaged in several types of listening sessions in Q4, including:
    - Leadership Townhalls, which are hosted throughout the service territory to ensure insights from the various regions are represented
    - the executive leadership team hosting calls for all coworkers to attend and ask questions
    - in-person discussion sessions for executive operations leaders to engage with coworkers in their work locations, and
    - safety-focused summits held by the functional areas.
  - All PG&E leaders engaged in Go-Sees in 2024, increasing their presence and availability to learn and support safety risks and concerns of coworkers. A Go-See is a planned leadership field visit focused on observing a specific type of field work activity.
  - Additionally, PG&E continues to encourage and manage employee concerns and ideas through our Corrective Action Program (CAP).
     CAP submissions are reviewed daily by senior leadership, and multiple CAP roadshows are hosted to ensure coworkers understand how to use this meaningful speak up tool.
  - PG&E hosted three safety weeks in 2024, expanding and refreshing the safety knowledge and skills of our coworkers. Subjects included Driving Safety, PG&E Safety Excellence Management System and Human Performance Tools.
- Pursuant to recommendation #2,
  - o Optimize safety-enabling systems to improve the quality of investigations:
    - The Enterprise Cause Evaluation team completed the fourth assessment of PG&E's major functional areas. These assessments are documented in the Corrective Action Program (CAP) tool for retrieval and reference. This assessment aimed to evaluate functional area adherence to PG&E's published causal evaluation standard and procedures as part of the greater corrective action program. The objective of this work is to ensure quality of the evaluations, confirm that procedures are followed and that cause evaluations for serious safety incidents are documented to a consistent standard, ensuring that learning opportunities are adequately captured. These insights identify improvement opportunities in training and process management.
    - The Enterprise Cause Evaluation Team completed a review of eight serious safety incidents in the fourth quarter. These reviews utilized 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
- use the insights to coach individual causal evaluators to improve their performance
- use the insights to coach team managers to provide improvement feedback on changes they might implement to ensure high quality cause evaluations are consistently performed.
- Established an Enterprise (cross-functional) Corrective Action Review Board (CARB) comprised of functional area CARB chairs to review SIF root cause evaluations with the goal of ensuring investigation quality, including validating the establishment of appropriate controls to mitigate future events.
  - This is a continuation of a second quarter 2024 action when instructor led- training was provided for all for roles and responsibilities involved in cause evaluation, including Corrective Action Review Board members, to improve the participant and leader knowledge of quality cause evaluations to improve the results during such a report's development.
- Improve hazard and near miss reporting process to align expectations on what to report and when to report:
  - In Q4, the Near Hit program focused efforts on training Grassroots teams about the Near Hit program and continued a two-pronged approach focusing on specific coworker shared Near Hits as well as a series of program tips on how to submit and share Near Hit information easily. This included:
    - Four presentations with Grassroot teams, representing different work areas, focused on how Near Hits are related to safety culture and provide Grassroots teams with safety data.
    - Sharing specific Near Hit information in enterprise communications with links to program information for coworker ease of access.
    - Near Hit program messaging highlighting the Near Hit Dashboard, the Near Hit Central website, how-to guides, and library of featured Near Hits, and
    - Organizationally focused Near Hit sharing utilizing workgroup specific communication channels, Third Thursday Tool Kits, and Regional Safety Director communications.
- o Increase worker psychological safety, building confidence in their "speak up" and "stop the job" authority:
  - Published daily safety messages in the Daily Safety Update and articles in the weekly Safety Snapshot about the importance of fostering psychological safety. These messages encouraged

coworkers to feel they can speak up, stop the job, and raise safety concerns without judgment or retribution. Monthly Diversity Equity Inclusion and Belonging (DEIB) and Employee Resource Group workshops presented discussion-based learning opportunities about scenarios, tips and skills that cultivate psychological safety and a speak-up culture.

- Continuing to develop a new Critical Incident Stress Management (CISM) program to support our coworkers' psychological safety and well-being in the event of a crisis. Activities included onboarding a second program manager, scoping training resources, identifying peer support parameters, outlining a project and implementation plan, and beginning process and procedure documentation.
- Increasing the promotion of the Enterprise Safety Recognition Program that awards recognition to coworkers who demonstrated proactive safety behaviors via coworker nominations. Examples of behaviors that warrant recognition include stopping the job when unsafe conditions are identified and helping our customers who encounter safety hazards or emergencies, ensuring everyone and everything is always safe. This program facilitated an:
  - Enhanced safety culture.
  - Improved safety performance by reinforcing risk identification and controls and reduced injuries; and increased joy at work among those who recognized others, as well as those who were recognized.
- Pursuant to recommendation #3,
  - o Incorporating new safety-related training modalities:
    - Continuing to expand training modalities and increase hands-on training for employees. The summary below includes key training statistics through Q4 2024:
      - 48,578 employees and contractors completed PG&E training.
      - 1,361,136 hours of PG&E training completed.
      - 29% was online training (web-based training, virtual learnings, or recorded webcasts) conducted through a work computer or mobile device.
      - 71% was hands-on instructor-led training, and hands-on instructor-led training hours increased 7% when comparing Q1 to Q4 2024 to the same period in 2023.
      - Over 13,000 frontline coworkers completed SIF Capacity training (e.g., the energy wheel, which is a tool designed to identify high-energy hazards and implement essential controls). The energy wheel training is part of a broader strategy to improve pre-job safety briefings and ensure that controls are in place and functioning effectively. The initiative has already shown promising results, with increased high-

energy control identification from 49% to 77%. This is a 28% improvement from 2023 to 2024.

- PG&E continued to reduce Web Based Training (WBT) and increase hands-on, skill-based training by performing difficulty-importancefrequency 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 7% reduction in total number of WBTs completed by employees when comparing Q1 to Q4 2024 to the same period in 2023.
- In Q4, a new hands-on Supervisory Control and Data Acquisition (SCADA) Controller training program for electric operations was deployed, with nearly 1,500 electric operations employees trained. Lineworker Fundamentals training was piloted – this is a 2-week training targeted to non-traditional leaders in Electric Operations and Field Safety Specialists to help them identify risks their crews face and the tools and knowledge to mitigate those risks while performing safety engagements in the field. An Excavation Safety training update was delivered by Field Safety Specialists to more than 2,100 frontline coworkers.
- Conducting post-training peer learning activities:
  - PG&E collects feedback from coworkers about training through multiple channels including post-training surveys, post-pilot feedback, training alignment and apprenticeship committees, and 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 the results of these training effectiveness evaluations to continuously improve training.
  - The Frontline Safety Culture Program was launched in Gas Operations and Electric Operations in October. This program deploys experienced utility leaders with proven effective communication skills, to engage frontline and middle-management leaders on their strategies for building and upholding a healthy safety culture. They address their thought processes with real-life situations that involve judgement calls in the field that are not covered by standard policies or procedures. The observations and feedback content from these mentoring sessions are collected and then trended. The outcomes of the trending analysis are then shared with the executive leadership teams. Executive sponsors from the functional areas are expected to act on areas needing additional focus to improve safety culture.

- The Emergency Preparedness and Response team regularly conducts peer learning activities such as exercises, drills and workshops. Post-training discussions are consistently performed following each exercise and drill. Drills and exercises are designed to provide coaching and mentoring opportunities throughout the scenario. For example, in 2024, a Public Safety Power Shutoff and Wildfire full-scale exercise was conducted over five days. Peer-to-peer discussions, coaching and mentoring throughout the five-day period led to improved wildfire mitigation proficiency. In addition to the full-scale exercise, a wildfire tabletop drill and wildfire seminar were conducted in 2024. Each included post-training discussions to continuously improve wildfire mitigation training and exercises.
- Pursuant to recommendation #4,
  - Recognize and take action to mitigate the risk exposure posed by interactions with the public:
    - In Q4 2024, Corporate Security provided virtual reality training to 206 field coworkers. The training placed the coworker in an immersive environment where they identify and respond to different threats from hostile individuals in a safe environment. In all of 2024, 801 field personnel were trained using virtual reality.
    - Corporate Security also provided training to over 10,000 coworkers on situational awareness, field safety and how to operate the LiveSafe application. The training program will continue in 2025
    - Corporate Security increased the staffing of the Vegetation Management Field Security Team from five to eight team members in Q4 2024. They intervened and negotiated with hostile customers so vegetation and inspection crews could work in a safe environment. The efforts of the Field Security Team reduced overall workplace violence incidents by 10% in 2024 in comparison to 2023. The Field Security Team will continue to operate in 2025, with a goal of reducing workplace violence incidents by another 2.4%.
    - In Q2 2024, Corporate Security, in coordination with the Oakland Police Department, hired off-duty Police Officers to patrol the downtown area of Oakland in an effort to reduce crime that affected PG&E coworkers who worked in Oakland. At the end of 2024, there was an overall 68% reduction in crime for the downtown area in comparison to the same time period in 2023. Survey results in Q4 2024 of coworkers who worked in the Oakland General Office stated they felt safer than the previous survey that was completed in Q1 2024. This program will continue in 2025.
    - In Q4 2024, private security guards and off-duty Oakland Police Officers continued to escort field crews who operated in Oakland. A typical deployment day usually involves 20 security officers and eight police officers deploying with field personnel. In all of 2024, there were no reported incidents of workplace violence involving a work

crew that had been escorted by security. This program will continue in 2025.

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 – Q4 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 fourth quarter, the SNO Committees held a stand-alone meeting on December 11, 2024.

During the December stand-alone meeting, the SNO Committees received an update on safety benchmarking and reviewed safety performance, including nuclear safety, and an update from the Nuclear Safety Oversight Committee. The Committees also discussed the risk associated with large uncontrolled water release. Lastly, the Committees received an update on cybersecurity and corporate security, and a wildfire mitigation update.

#### <u>Recommendations of Boards of Directors' Safety Committee Meetings During Q4</u> 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 fourth quarter of 2024:

- Review policy regarding the accessibility of public to our dams (specifically earthen dams); and
- Given downed conductor detection technology success, roll out the technology more quickly and share successes with other utilities.

### Management Implementation of Recommendations Described in Q4 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 third quarter of 2024.

<u>Recommendation # 1</u>: Consider assessing the risk of battery storage as it relates to corporate and enterprise risk.

<u>Management's response</u>: Through the process of expanding Power Generation's risk register in 2024, Battery Energy Storage System (BESS) Thermal Runaway was added to Power Generation's functional area risk register. Starting in 2025, risk program enhancement activities will assess functional area risks that have been added to Power Generation's risk register, including BESS Thermal Runaway. There are several industry incidents under Power Generation's review to glean lessons learned and build clear understanding of top mitigations and controls. BESS Thermal Runaway, including top mitigations and controls and next steps for risk management, will be covered in more detail in the February 2025 SNO Committee agenda.

<u>Recommendation # 2</u>: Consider including near misses as a leading indicator for workforce safety exposure.

<u>Management's response</u>: In accordance with this recommendation, PG&E uses near hits as a leading indicator for workforce safety exposure. PG&E has a formal process for reporting and sharing near hits, which are included in the leading safety indicator of the Daily Safety Update (DSU) every day. Lessons learned from near hits are shared in a Daily Safety Message usually once per week, are discussed in enterprise third Thursday safety meetings, and in operational and enterprise all-hands calls. Additionally, a near hits web page is maintained that contains PG&E's near hit standard, recent examples, etc.

# **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 <u>wade.greenacre@pge.com</u>.

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>5</sup>					
A. Situational Awareness and Forecasting	SA-02 - Line Sensor - Installations	SA-10 - Distribution Fault Anticipation (DFA) Installations	SA-11 - Early Fault Detection (EFD) Installations			
B. Grid Design, Operations and Maintenance	AI-02 - Detailed Inspection Transmission – Ground	AI-04 - Detailed Inspection Transmission – Aerial	AI-05 - Detailed Inspection Transmission – Climbing	AI-06 - Perform transmission infrared inspections		
	AI-07 - Detailed Ground Inspections - Distribution	AI-08 - Supplemental Inspections - Substation Distribution	AI-09 - Supplemental Inspections - Substation Transmission	AI-10 - Supplemental Inspections - Hydroelectric Substations and Powerhouses		
	GH-01 - System Hardening - Distribution	GH-02 - Evaluate Covered Conductor Effectiveness	GH-04 - 10K Undergrounding	GH-06 - System Hardening - Transmission Shunt Splices		
	GH-09 - Distribution Line Motor Switch Operator (MSO) - Replacements	GH-10 - Non-Exempt Expulsion Fuse - Removal				
	GM-01 - Asset Inspections - Quality Assurance	GM-03 – Eliminate HFTD-HFRA Distribution Backlog	GM-06 - EPSS - Down Conductor Detection (DCD)	GM-07 – Updates on EPSS Reliability Study		
	GM-09 – Asset Inspection-Quality Control					

<sup>&</sup>lt;sup>5</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					
C. Vegetation Management and Inspection	VM-01 - LiDAR Data Collection - Transmission	VM-02 - Pole Clearing Program	VM-03 - Focused Tree Inspection Program	VM-04 - Tree Removal Inventory		
	VM-05 - Defensible Space Inspections - Distribution Substation	VM-06 - Defensible Space Inspections - Transmission Substation	VM-07 - Defensible Space Inspections - Hydroelectric Substations and Powerhouses	VM-08 - Vegetation Management – Quality Verification		
	VM-13 - Routine Ground - Transmission	VM-14 - Transmission Second Patrol	VM-15 - Integrated Vegetation Management - Transmission	VM-16 - Distribution Routine Patrol		
	VM-17 - Distribution Second Patrol	VM-18 – VM for Operational Mitigations (VMOM)	VM-19 – One VM Application Record Keeping Enhancement (Routine, Second Petrol)	VM-20 – Record Keeping Enhancement (VMOM		
	VM-21 - FTI Record Keeping Enhancement	VM-22 - Vegetation Management – Quality Control				
D. Public Safety Power Shut off	PS-06 - Provide batteries to PG&E customers	PS-07 - PSPS Customer Impact Reduction	PS-11 – Pilot using drones for PSPS restoration			
E. Emergency Preparedness Plan	EP-01 - Complete PSPS and Wildfire Tabletop and Functional Exercises	EP-06 - Review, and revise the CERP and 2 Wildfire Related Annexes on a yearly basis				
F. Community Outreach and Engagement	CO-01 - Community Engagement – Meetings	CO-02 - Community Engagement - Surveys				