Pacific Gas and Electric Company®

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February 28, 2025

Via: Electronic Submission

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

Re: Pacific Gas and Electric Company's Comments on Final Annual Report on Compliance for the 2022 Wildfire Mitigation Plan, Docket No. 2022-ARC

Dear Mr. Doherty

Pacific Gas and Electric Company submits these comments in response to the Final 2022 Annual Report on Compliance (ARC), issued by the Office of Energy Infrastructure Safety (Energy Safety) on February 14, 2025, determining our compliance with our 2022 Wildfire Mitigation Plan (WMP).

We were pleased to see Energy Safety's acknowledgement of our efforts to execute and meet our objectives and initiatives for the 2022 WMP and appreciate the opportunity to provide supplemental information and context to Energy Safety's findings. Please do not hesitate to reach out should you have any questions or concerns.

Sincerely,

Jerrod Meier,
Director, Electric Regulatory Compliance

Pacific Gas and Electric Company's Comments on the Office of Energy Infrastructure Safety's Final Annual Report on Compliance for the 2022 Wildfire Mitigation Plan

February 28, 2025

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I. EXECUTIVE SUMMARY

In 2022, Pacific Gas and Electric Company (PG&E) continued to enhance and mature its profile of initiatives to reduce its wildfire risk. The work that the Office of Energy Infrastructure Safety (Energy Safety) undertook in reviewing and approving our 2022 WMP contributed to these improvements toward enhanced public safety.

While Energy Safety concluded that "PG&E was largely successful in executing its plan for wildfire risk mitigation in 2022 as it completed 93% of its WMP initiative activities" our goal through this response is to demonstrate a higher level of conformance to the established targets and a dedication to prioritize risk reduction.

The responses to findings on 10 initiatives identified by Energy Safety as deficient or inconclusive provide additional information or context to illustrate higher levels of actual attainment or rationale that demonstrates a shift to higher priority work to reduce wildfire risk. In addition, most issues cited in the 2022 ARC have been addressed in subsequent WMPs through the evolution of mitigation work in the PG&E service territory. We continue to diligently and transparently respond to and incorporate Energy Safety's findings and recommendations in subsequent filings and reports and will continue to innovate and seek breakthrough solutions to further evolve future WMPs. PG&E remains committed to eliminating wildfire risk caused by electric utility facilities.

II. PG&E DID NOT FAIL TO FUND ANY ACTIVITIES IN THE WMP

Regarding PG&E's WMP financials, Energy Safety found that:

> PG&E spent less than planned on its initiative activity work by approximately $657 million (11%), compared to its planned expenditure of approximately $5,964,000,000 for the 2022 WMP Update. Ultimately, PG&E spent approximately $5,307,000,000 on work related to the 2022 WMP Update. PG&E attributed much of the variance between planned and actual expenditure as due to positive efficiencies in operations as well as, comparatively favorable weather conditions related to fire season and situational awareness controls.[1]

This finding is correct that, in 2022, we spent approximately $5.3 billion on wildfire mitigation work as part of our WMP, which was less than the approximately $6.0 billion that we forecasted. However, this 11% decrease from the forecast to the actual spending was the result of several factors explained below. Even more importantly, we note that, despite this cost savings, we did not fail to fund any activities included in the WMP. The analysis, which was performed as part of the Independent Evaluator (IE) audit, is a variance analysis illustrating how the assumptions around work plan and unit cost drivers (made when preparing the 2022 WMP) compared to the actual drivers that factored into the 2022 recorded spend. Differences in spend are driven by financial and work plan factors, such as efficiencies in work performance,

[1] Energy Safety 2022 WMP ARC for PG&E (Feb. 14, 2022) at 1.

favorable environmental conditions, timing, strategy, risk assessment, and by unit cost.

As we explained in our 2022 WMP ARC and IE ARC Response, notable variances in expense spending include over $59 million under forecast on EPSS patrols due to efficiencies made by our EPSS program,[2] and over $68 million[3] and $72 million[4] under forecast on PSPS events and PSPS mitigation work, respectively. These changes in spending were due to favorable weather conditions precluding the need for PSPS events and lower costs for temporary generators than anticipated. Additionally, the Vegetation Management (VM) Program experienced significant efficiencies in 2022 where the holistic Vegetation Management program came in $144 million under the forecast.[5] Specifically, Routine Distribution, EVM, and Second Patrol Tree Mortality came in under budget and EVM, Transmission Routine, and Transmission Right of Way all experienced decreased unit costs, leading to this $144 million savings. It should also be noted that, despite savings on some initiatives, there were other initiatives that required substantially more expense spending than was initially forecast. One particular example was our fuel management program, which required over $67 million in additional funding due to significantly more customers opting into the program than forecast, as well as a higher unit cost to perform the work than anticipated.

For capital spending, notable variances include: (1) $274 million on updates to grid topology (i.e., system hardening) due to favorable unit cost performance on covered conductor installation and changes in the timing of our 2023 readiness program costs for the undergrounding program;[6] and (2) $88 million in savings on transmission tower maintenance and replacement due to successful contract negotiations for some projects and necessary deferrals for other projects as a result of permitting and access constraints.[7] Importantly, we completed all our undergrounding and system hardening initiative targets and this variance in actual spending was because we were able to realize lower unit costs for this mitigation work in 2022, which resulted in spendings of $204 million under forecast. Overall, we were able to reduce costs for our customers while still accomplishing our critical wildfire mitigation work.

III. PG&E SIGNIFICANTLY REDUCED THE WILDFIRE POTENTIAL IN ITS SERVICE TERRITORY IN 2022

PG&E disagrees with Energy Safety's determination that PG&E failed to meet one of its three 2022 WMP objective goals: to reduce wildfire potential during the 2022 compliance

[2] PG&E 2022 ARC at 16.
[3] PG&E 2022 ARC at 16.
[4] PG&E 2022 ARC at 16.
[5] PG&E Response to IE ARC at 13.
[6] PG&E 2022 ARC at 16
[7] PG&E 2022 ARC at 16.

period.[8] Specifically, Energy Safety found that we did not meet all our VM initiative activities in 2022, and did not fully fund all our VM initiatives, primarily initiative 7.3.5.2 - Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electrical Lines and Equipment.[9] Furthermore, with respect to PG&E's Pole Clearing program that attained its 2022 WMP Update targets, Energy Safety's Substantial Vegetation Management (SVM) Audit Report indicated that "[w]hile 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 VM database in 2022 which detracted from PG&E's ability to address wildfire risk."[10] Additionally, Energy Safety concluded that PG&E failed to perform all the work required by initiatives such as 7.3.3.4 - Covered Conductor Maintenance, 7.3.3.12.4 - HFTD/HFRA Open Tag Reduction-Distribution, and 7.3.6.6 - Stationed and On-Call Ignition Prevention and Suppression Resources and Services in 2022.[11]

By Energy Safety's own determination, PG&E completed 93% (129 out of 139) of its 2022 WMP initiative activities.[12] To say that PG&E completed 93% of the mitigation work it intended to perform but failed to reduce wildfire potential during the 2022 compliance period, is logically inconsistent and contrary to the evidence. Indeed, PG&E feels that the significant effort of the 129 initiative activities that were met, and the additional information provided regarding initiatives 7.3.3.4 and 7.3.6.6 below, shows that PG&E worked tirelessly towards reducing wildfire potential in its service territory in 2022.

While Energy Safety concluded that PG&E was not able to meet the WMP target for E tags in 7.3.3.12.4 - HFTD/HFRA Open Tag Reduction-Distribution, PG&E missed this target by prioritizing higher safety risk A and B tags over the backlog commitment for lower safety risk E tags. Our focus on the highest safety risk tags in our high fire threat areas—that could have caused an ignition if the assets failed—was evidence of our commitment to prioritizing safety over a regulatory target. Thus, while we did not meet this regulatory target, this work still contributed to the goal of reducing wildfire potential in our territory (even if it did not count toward the WMP target) as each of these tags had ignition potential.

Furthermore, as noted by Energy Safety in the 2022 ARC, PG&E's raw ignition counts reduced in 2022 to the levels observed in 2015, which represented a 20% decrease from levels observed in 2017 and a 6% decrease from 2020.[13] Given that this occurred in a year when we did not have any PSPS events, it demonstrates that the efforts by PG&E were in fact reducing the ignition potential by decreasing ignition counts to reduce the chances for wildfire.

[8] Energy Safety 2022 WMP ARC for PG&E at 48.
[9] Energy Safety 2022 WMP ARC for PG&E at 48
[10] Energy Safety SVM Audit Report at 11.
[11] Energy Safety 2022 WMP ARC for PG&E at 48.
[12] Energy Safety 2022 WMP ARC for PG&E at 1, 70.
[13] Energy Safety 2022 WMP ARC for PG&E at 50.

IV. RESPONSES TO FINDINGS FOR SPECIFIC WMP INITIATIVE ACTIVITIES

PG&E's 2022 WMP Update included a total of 139 initiatives. Energy Safety determined that PG&E completed 129 of the 139 (or 93%) of its 2022 WMP Update Initiative activities, seven of which being VM initiative activities. Energy Safety's analysis indicated that PG&E did not perform all the work required to meet 10 targets for various initiatives, and we respond to each below.

1. Covered Conductor Maintenance (7.3.3.4)

Energy Safety Finding No. 01:

Regarding PG&E's initiative 7.3.3.4 (Covered Conductor Maintenance), Energy Safety stated that it was unable to determine if compliance was achieved for this initiative activity because PG&E only provided documentation regarding inspection and monitoring and did not provide data on maintenance, repairs, or replacements of covered conductor. [14]

PG&E Response to Finding No. 01:

PG&E appreciates Energy Safety's concern but notes that it did not provide comprehensive data on covered conductor maintenance, repairs, or replacements because nearly all of PG&E's covered conductor was newly installed and did not require maintenance, repair, or replacement during the 2022 compliance period. Instead, PG&E's covered conductor only required inspection, which was demonstrated by the records provided to Energy Safety. PG&E's System Hardening program began installing significant amounts of covered conductor in 2019, and the assets had not significantly degraded as of 2022 so as to require maintenance, repair, or replacement.

However, PG&E experienced two ignitions (one in 2021 and one in 2022) involving covered conductor, which resulted from large trees breaking through the power lines, and subsequent repairs. Please see attachment, *"DRU15178_Q001_Atch01_Index PIIR 539_20210510_CONF.pdf"* which was the ignition on Paradise 1105, that caused large tree vegetation to break the covered conductor. The repair occurred on EC 120991691, PM 35248842, and cost $124k.

Please see attachment, *"DRU15178_Q001_Atch02_Index PIIR 531_20220502_CONF.pdf"* which was the ignition on Brunswick 1103, that was caused by our third-party contractor felling a tree, that came down in the incorrect location and broke through the covered conductor. The repair occurred on ECs 123480524/123480521, PM 31602423, and cost $52k.

[14] Energy Safety 2022 WMP ARC for PG&E at 40.

2. Other Corrective Action, Maintenance, Distribution (D.10) (7.3.3.12.4)

Energy Safety Finding No. 02:

Regarding initiative 7.3.3.12.4 (Other Corrective Action, Maintenance, Distribution), Energy Safety determined that:

PG&E was not able to meet the target, particularly E tags, because more category A and B tags were created during 2022 than PG&E anticipated. A and B tags were prioritized over E tags because of shorter regulatory compliance requirements, and because A and B tags are generally greater higher risk than E tags.[15]

PG&E Response to Finding No. 02:

As described in PG&E's 2022 Annual Report on Compliance from March 2023, PG&E agrees with the finding that it closed a total of 45,951 E tags in HFTD and HFRA areas, which was 16.5% lower than the target of 55,000 E maintenance tags.[16] PG&E confirms that it was not able to meet the target for E tags because more category A and B tags were created during 2022 than PG&E anticipated. However, A and B tags were prioritized over E tags because of the higher safety risk associated with A and B tags, demonstrating PG&E's commitment to safety even if it means missing a regulatory target. Thus, while we did not meet this target, we continued to prioritize our commitment to working the riskiest tags first and preventing A and B tags from being added to the backlog. Furthermore, consistent with Energy Safety's guidance, we have prioritized resolving our asset tag backlog in each subsequent years of the WMP and created both long-term and short-term plans for addressing our tag backlog.

3. Detailed Inspections of Vegetation Around Distribution Electric Lines and Equipment (7.3.5.2)

Energy Safety Finding No. 03:

Concerning initiative 7.3.5.2 (Detailed Inspections of Vegetation Around Distribution Electric Lines and Equipment), Energy Safety found that PG&E failed to complete all of its mitigation work for dead or dying trees identified by the Tree Mortality Patrol Program in the prescribed timeframe.[17]

PG&E Response to Finding No. 03:

PG&E agrees with this finding and notes that it was previously identified by Energy Safety in the 2022 Substantial VM (SVM) audit.[18] In response to the SVM audit, PG&E

[15] Energy Safety 2022 WMP ARC for PG&E at 40.
[16] PG&E 2022 ARC at 30.
[17] Energy Safety 2022 WMP ARC for PG&E at 41.
[18] Energy Safety 2022 SVM Audit for PG&E at A-8 to A-9.

identified corrective actions to take in response to this issue and has been diligently performing mitigation work on the remaining dead and dying trees.[19] PG&E would like to share the progress made on the 1,052 dead and dying trees that were constrained per our response from August 26, 2024. Please see attachment *"DRU15178_Q003_Atch01_DRU14062_Statement 7_Atch01_Project year 2022 2nd Patrol Tree Records.xlsx"* for the updated Dead and Dying tree records. Please note, only dead or dying trees are subject to the 180 HFTD/365 Non-HFTD timeframe for work. The status of these 1,052 trees as of February 21, 2025, is detailed as follows:

- For HFTD, there are 945 trees identified as dead and dying.
    - Of the 945 trees:
        - 291 trees have been inventoried, notification code (N), which means no work is needed. If the constraints have been resolved or closed and the tree in question has been worked, an updated work date will be populated in Column S 'Updated Work Date.'
        - 467 trees still have a notification code of Quarantine (Q) or Refusal (R), which means they are still constrained. If the constraints have been resolved or closed and the tree in question has been worked, an updated work date will be populated in Column S 'Updated Work Date.'
        - 187 trees have a notification code of Open (O) or Contact (C), which means these trees can be worked, however, they may be affected by constraints as well. If the tree in question has been worked, an updated work date will be populated in Column Y 'Updated Work Date.'

- For Non-HFTD, there are 107 trees identified as dead and dying.
    - Of the 107 trees:
        - 64 trees have been inventoried, notification code (N), which means no work is needed. If the constraints have been resolved or closed and the tree in question has been worked, an updated work date will be populated in Column S 'Updated Work Date.'
        - 22 trees still have a notification code of Quarantine (Q) or Refusal (R), which means they are still constrained. If the constraints have been resolved or closed and the tree in question has been worked, an updated work date will be populated in Column S 'Updated Work Date.'
        - 21 trees have a notification code of Open (O) or Contact (C), which means these trees can be worked, however, they may be affected by constraints as well. If the tree in question has been worked, an updated work date will be populated in Column S 'Updated Work Date.'

Furthermore, as stated in our response to the SVM audit, in order to ensure visibility and tracking towards these timelines, a metric for dead and dying trees was incorporated into

[19] PG&E Response to Energy Safety 2022 SVM Audit (Aug. 26, 2024) at 5-6.

operations' Daily Operating Review (DOR) meetings.[20] These DORs occur at leadership levels to maintain visibility of priorities and align on daily outcomes. To support these operating reviews, a Power BI dashboard was also created, which is updated daily to sync with our VM systems of record. The Power BI is available to VM team members. It was developed in 2022 to provide local VM teams with both a visual and line-item detail on dead and dying trees identified with the calculated due date as outlined above.

4. Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electric Lines and Equipment (7.3.5.3)

Energy Safety Finding No. 04:

Regarding initiative 7.3.5.3 (Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electric Lines and Equipment), Energy Safety found that PG&E completed only 55%, or 4,979 acres, of IVM work in 2022, as opposed to its target of 9,000 acres.[21]

PG&E Response to Finding No. 04:

PG&E notes that this finding was previously shared in Energy Safety's 2022 SVM audit and PG&E continues to agree with the finding.[22] As stated in response to the SVM audit, PG&E prioritized vegetation work on the distribution system as higher priority vegetation work at the time, thus, carrying over some IVM work into later years.[23] PG&E's guidance was informal at the time, and since then, as a corrective action, PG&E formalized the process to prioritize Transmission IVM work based on aging work cycles and evaluation of vegetation regrowth.

Additionally, PG&E would like to report out on progress made on the remaining acres identified for work. The remaining acres were carried over into 2023, 2024 and 2025 due to budget resource, environmental, and work area access constraints. Of the remaining acres from the 2022 IVM projects, plus additional scope added in later years, we completed 3,536 acres in 2023, 2,589 acres in 2024, and currently have 766 acres planned for 2025. Please note, when projects are carried over to a new year, they are reassessed, and acres may be added or removed based on whether work is needed within the identified project footprints.

5. Improvement of Inspections (7.3.5.6)

Energy Safety Finding No. 05:

Concerning initiative 7.3.5.6 (Improvement of Inspections), Energy Safety concluded that

[20] PG&E Response to Energy Safety 2022 SVM Audit at 6.
[21] Energy Safety 2022 WMP ARC for PG&E at 42.
[22] PG&E Response to Energy Safety 2022 SVM Audit at 7-8.
[23] PG&E Response to Energy Safety 2022 SVM Audit at 8.

PG&E could not provide documentation indicating that six SVM Inspectors (SVMIs) completed pre-inspection training and that PG&E's recordkeeping deficiencies in its 2022 training system prevented PG&E from ensuring that all of its SVMIs received all required inspection training in 2022.[24]

PG&E Response to Finding No. 05:

As this was also previously identified in the SVM audit, PG&E continues to agree with Energy Safety's finding regarding SVMI training.[25] As stated previously, our VM Structured Learning Path (SLP) trainings required manual assignment and tracking by supervisors, which made it possible to lose track of whether trainings were assigned and completed and whether post-training audits were conducted.[26] As a corrective action to improve this process, 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.[27]

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 conducted through this new profiled-training system, and the quality of the work conducted is confirmed through PG&E's Quality Control and Quality Assurance programs.

6. Improvement of Inspections (7.3.5.6)

Energy Safety Finding No. 06:

As a separate finding for initiative 7.3.5.6 (Improvement of Inspections), Energy Safety determined that PG&E did not perform post-training audits to assess the work of its SVMIs.[28]

PG&E Response to Finding No. 06:

As noted in its response to the SVM audit, PG&E continues to agree with the finding regarding post-training audits.[29] As stated previously, as a corrective action PG&E began conducting post-training audits in 2024 under a new system of profiling trainings within the PG&E MyLearning system, which is part of the PG&E Academy.[30]

[24] Energy Safety 2022 WMP ARC for PG&E at 43.
[25] PG&E Response to Energy Safety 2022 SVM Audit at 9-10.
[26] PG&E Response to Energy Safety 2022 SVM Audit at 10.
[27] PG&E Response to Energy Safety 2022 SVM Audit at 10.
[28] Energy Safety 2022 WMP ARC for PG&E at 44.
[29] PG&E Response to Energy Safety 2022 SVM Audit at 10.
[30] PG&E Response to Energy Safety 2022 SVM Audit at 10.

7. Other Discretionary Inspections of Vegetation Around Transmission Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations (7.3.5.10)

Energy Safety Finding No. 07:

For initiative 7.3.5.10 (Other Discretionary Inspections of Vegetation Around Transmission Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations), Energy Safety found that PG&E's targets for activities under initiative 7.3.5.10 were tied to targets under initiative 7.3.5.3, including the target to complete approximately 9,000 acres of IVM work. PG&E completed 55%, or 4,979 acres, of IVM work in 2022, as opposed to its target of 9,000 acres.[31]

PG&E Response to Finding No. 07:

As this issue is the same as that identified in Energy Safety's Finding No. 4 above, please refer to the response for Finding No. 4 which details the explanation for this issue and the corrective action taken by PG&E.

8. Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment (7.3.5.12)

Energy Safety Finding No. 08:

Relating to initiative 7.3.5.12 (Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment), Energy Safety also determined that PG&E's targets for activities under initiative 7.3.5.12 were tied to targets under initiative 7.3.5.3, including the target to complete approximately 9,000 acres of IVM work.[32] PG&E completed 55%, or 4,979 acres, of IVM work in 2022, as opposed to its target of 9,000 acres.[33]

PG&E Response to Finding No. 08:

As this issue is the same as that identified in Energy Safety's Finding No. 4 above, please refer to the response for Finding No. 4 which details the explanation for this issue and the corrective action taken by PG&E.

[31] Energy Safety 2022 WMP ARC for PG&E at 45.
[32] Energy Safety 2022 WMP ARC for PG&E at 45.
[33] Energy Safety 2022 WMP ARC for PG&E at 45.

9. Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment (7.3.5.16)

Energy Safety Finding No. 09:

For initiative 7.3.5.16 (Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment), Energy Safety concluded that:

> PG&E failed to complete 13% of its mitigation work prescribed to address dead or dying trees identified by the Tree Mortality Patrol Program in both HFTD and non-HFTD areas in the prescribed timeframe. Additionally, 2% of the identified work in both HFTD and non-HFTD areas had no reported work completion date as of August 26, 2024.[34]

PG&E Response to Finding No. 09:

As these issues are the same as those identified in Energy Safety's Findings Nos. 3 and 4 above, please refer to the responses for Findings Nos. 3 and 4 which detail the explanations for these issues and the corrective actions taken by PG&E.

10. Stationed and On-Call Ignition Prevention and Suppression Resources and Services (7.3.6.6)

Energy Safety Finding No. 10:

Regarding initiative 7.3.6.6 (Stationed and On-Call Ignition Prevention and Suppression Resources and Services):

> Energy Safety was unable to determine if compliance was achieved for this initiative activity. Although PG&E provided documentation showing that it supported fire prevention mitigation activities by employing 130 individuals, and 45 crews, at 34 locations, the documentation did not clearly identify the "on call" status of the SIPT staff "during the summer preparedness period."[35]

PG&E Response to Finding No. 10:

PG&E apologizes for this issue and provides the following explanation of its SIPT program and evidence of the on-call status of the crews. In 2022, SIPT employed 130 coworkers, staffed 45 crews at 35 locations. During the summer preparedness period of April 29, 2022, through November 10, 2022, SIPT maintained nine engines per day in on-call status. On-call status is defined as crews scheduled for immediate call-back for emergency call-out, as defined in Letter Agreement (LA) 19-36-PGE. In April 2022, SIPT expanded headcount by adding two supervisors, 14 crew leads, and 6 technicians, and ended the year within the approved budget.

[34] Energy Safety 2022 WMP ARC for PG&E at 46.
[35] Energy Safety 2022 WMP ARC for PG&E at 47.

Favorable weather conditions lending to an early transition away from peak wildfire season conditions also contributed to reduced demand for on-call staffing and associated expenditures.

Please see attachment, *"DRU15178_Q010_Atch01_LA-19-36-PGE_CONF.pdf"* which is the letter agreement between PG&E and the International Brotherhood of Electrical Workers (IBEW) defining the agreed upon on-call requirements for workers on pages 2 to 3.

Additionally, please see attachment, *"DRU15178_Q010_Atch02_Live 2022 SIPT schedule_CONF.xlsx"* which indicates which coworkers are on-call each day. The yellow highlighted cells indicate on-call staff. There is always one supervisor on-call year-round to act upon any afterhours or weekend requests for SIPT crews. This individual is called the "Duty Officer."

Lastly, please see attachment, *"DRU15178_Q010_Atch03_SIPT Engine Rotation 2022 V3 (Expansion).pdf"* for information regarding the nine active engines and location of on-call engines per week per month.

V. CONCLUSION

PG&E appreciates Energy Safety's acknowledgement of PG&E's efforts to execute and meet its 2022 WMP Updates. We take seriously the report's conclusions and have made organizational improvements to prevent the recurrence of these issues. We look forward to continuing our work with Energy Safety to achieve our goal of ending catastrophic wildfires. While we recognize that PG&E, like all the utilities, has areas to improve and lessons to learn, we believe that the actions we took and the outcomes that we achieved in 2022 clearly demonstrate substantial compliance with the 2022 WMP.