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Via: Electronic Submission

March 20, 2025

Sheryl Bilbrey
Program Manager, Environmental Science Division
Office of Energy Infrastructure Safety
California Natural Resource Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: PG&E 2023 Substantial Vegetation Management Audit Corrective Action Plan
Docket: Electrical: Compliance Enforcement/2023-SVM

Dear Program Manager Bilbrey:

This letter is in response to the Office of Energy Infrastructure Safety's (Energy Safety) 2023 Substantial Vegetation Management Audit (2023 SVM Audit) for Pacific Gas and Electric Company (PG&E), issued on February 18, 2025. The audit evaluated "vegetation management quantitative commitments (e.g., number of inspections completed) and verifiable statements (e.g., training of personnel)" in PG&E's 2023-2025 Wildfire Mitigation Plan (WMP) to determine "whether PG&E completed the required work" for each of those commitments and statements.¹ In its audit, Energy Safety found that PG&E did not provide information consistent with the completion of all targeted work for six of the thirteen initiatives in the 2023-2025 WMP.

Energy Safety concluded that PG&E demonstrated compliance with 20 out of the 26 (or 77% of) VM commitments/verifiable statements in our 2023-2025 WMP. Additionally, Energy Safety identified six instances where we did not provide information consistent with the completion of all targeted work. We appreciate the opportunity to provide our response. Below, please find PG&E's corrective action plan response on the identified six findings.

We note that in a number of instances, the supporting documentation originally provided in response to Energy Safety data requests was not sufficient. To limit this from happening in the future we will continue to work closely with Energy Safety staff to ensure alignment with the intent of each data

¹ Energy Safety's Audit on PG&E's 2023 Substantial Vegetation Management Audit Report at 1.

request. Our goal will continue to be to provide sufficient information as requested, so that we can be fully responsive. In response to the SVM Audit Report, evidence of documentation to support completion of 2023-2025 WMP vegetation management initiatives are provided in this letter.

Please do not hesitate to contact the undersigned at Jerrod.Meier@pge.com should you have any questions regarding this response.

Sincerely,

Jerrod Meier,
Director, Electric Regulatory Compliance

Corrective Action Plan Response

Energy Safety requested that PG&E submit a corrective action plan response to the eight findings. For each item, we provide the 2023 Vegetation Management Initiative, Energy Safety's finding, the corrective action, and our response.

Programmatic Area	8.2.2.1 Vegetation Management Inspections
Vegetation Management Initiative	8.2.2.2.2 Distribution Second Patrol
Finding:	PG&E did not provide information consistent with the completion of all work identified in Initiative 8.2.2.1 Vegetation Management Inspections.
Distribution Second Patrol Target	PG&E's WMP stated that Distribution Second Patrol inspections occur with an approximate six month offset from Distribution Routine Patrols to maintain clearances and to identify dead, dying, and declining trees in the HFTD.
Corrective Action(s):	PG&E must supply a corrective action response addressing the deficiencies identified in the Distribution Second Patrol target, Defensible Space Inspections – Distribution Substation target, and Statement 2.

Response to Distribution Second Patrol Target Finding:

PG&E respectfully disagrees that we failed to complete all work identified in Initiative 8.2.2.2.2 Distribution Second Patrol Vegetation Management Inspections according to our procedures. Per Distribution Vegetation Management Program Standard, TD-7102S Rev. 2, "The Second Patrol inspection cycle is typically planned and patrolled with a six-month offset from the annual patrol inspection date. This timing can vary due to operational or external factors."

While we strive to complete Distribution Second Patrol inspections approximately 6 months offset from Distribution Routine patrols, the following factors could impact the timing of the Second Patrol Inspections:

- Access Issues due to weather
 - Mountainous areas in winter cannot be inspected until the snow melts and then are re-inspected prior to the anticipation of snow.
 - Wet Marsh areas that need to dry out before they can be inspected but must be re-inspected before rain causes access issues.
 - HFTD/HFRA inspections can also get pushed back further in inspection schedule to ensure safety until fire threats in areas have passed.
- Constraints due to access issues or permission to inspect properties.
- Environmental Access Issues
 - Permitting requirements or delays.
 - Limited operating periods on Agency Owned Land.
- Second Patrol project schedules may be adjusted from the targeted 6-month offset schedule due to operational schedules of other WMP programs.

- If Distribution Routine inspections are delayed, then Second Patrol inspections may be pushed out to provide an offset between inspection cycles.

During the planning phase, Vegetation Asset Strategy and Analytics (VASA) provides Vegetation Management (VM) Operations with a list of Routine and Second Patrol projects, which includes timelines approximately six months offset of each other for the upcoming work year. VM Operations reviews the timelines being proposed and provides feedback as to whether or not changes need to be made to the timeline based on historical knowledge of the projects in question. Once all parties agree, the Routine and Second Patrol projects are uploaded into One VM prior to the beginning of the work year. The inspection schedules are reviewed on MORs to consistently review upcoming work/inspections and to identify any additional changes to timeline that may be needed.

Programmatic Area	8.2.2.1 Vegetation Management Inspections
Vegetation Management Initiative	8.2.2.2.4 Tree Removal Inventory
Finding:	PG&E did not provide information consistent with the completion of all work identified in Initiative 8.2.2.1 Vegetation Management Inspections.
Statement 2	“The Tree Removal Inventory Program digitally records data into a system called Field Maps. The data entered into the system includes information about Level 2 inspections. Our current procedure requires that a photograph of the TRAQ form is taken after the inspection is completed for digital record keeping purposes if the TRAQ certified arborist determines abatement is not required.”
Corrective Action(s):	PG&E must supply a corrective action response addressing the deficiencies identified in the Distribution Second Patrol target, Defensible Space Inspections – Distribution Substation target, and Statement 2.

Response to Statement 2:

PG&E agrees that a portion of trees requiring work under the TRI Program did not have a TRAQ form attached to their digital records in Field Map.

For the 355 trees noted in this finding, a refresh of the data indicates the following current statuses. Please see “*DRU15176_State 2_Atch01_Missing355_CONF.xlsx*” attachment for details:

- 66 tree records now have a TRAQ form attached.
- 32 trees were determined ‘Line Does Not Exist’, so TRAQ form is not needed.
- 60 trees were determined to have ‘No Strike Potential,’ so TRAQ form is not needed per the “Attachment 6, Tree Removal Inventory Program” in the “Vegetation Management Distribution Inspection Procedure, “*DRU15176_Statement 2_Atch02_TD-7102P-01_Att06r0.pdf*.” The attachment, which was effective in 2023, states that, “it is not necessary to upload the form when no work is required for the following reasons:
 - No overhead lines are present.
 - Tree does not exist.
 - Tree does not have the potential to fall into or otherwise impact the facilities.”

- Please note: 25 of these trees have a TRAQ form attached; however, it is not required.
- 123 trees were determined to have already been removed, so TRAQ form is not needed.
 - Please note: Seven of these trees have a TRAQ form attached; however, it is not required.
- 19 trees currently show as ‘Tree Still Requires Work.’
 - 18 trees are constrained or pending work, so TRAQ form is **neither needed nor available**.
 - 1 tree status changed to tree work complete, with tree work date of 12/20/2024, so no TRAQ form is needed.
- 55 tree records do not have TRAQ forms attached to their digital records in Field Maps. The VM operations team continues to work to address these.

As acknowledged in our initial 2023 SVM audit submission, a PowerBI report has been established to identify errors in TRI records, including missing TRAQ forms. The local Operations teams utilize the report to identify and fix errors.

To improve the completion and documentation of TRAQ forms, PG&E Operations teams have engaged in multiple process improvements:

- Providing additional coaching to inspectors who have repeatedly missed inputting TRAQ forms.
- Generating error reports for inspectors so they can address TRI record errors.
- Addressing TRAQ form upload errors as they arise.
- Reviewing procedures when new inspectors are brought on to support TRI patrols.
- Reviewing and reminding inspectors of required data fields per our TRI procedure (TD-7102P-01-Att06).

Programmatic Area	8.2.2.1 Vegetation Management Inspections
Vegetation Management Initiative	8.2.2.3.1 Defensible Space Inspection
Finding:	PG&E did not provide information consistent with the completion of all work identified in Initiative 8.2.2.1 Vegetation Management Inspections.
Defensible Space Inspection – Distribution Substation	Although PG&E met its target of completing inspections at 131 distribution substations, two of the inspections occurred in June 2023 which was outside of the inspection cycle stated in PG&E’s Procedure LAND 4001P- 01 (November 15 of the prior year to May 31 of the current year). Because PG&E stated in its 2023-2025 WMP that it would “complete defensible space inspections in alignment with the guidelines set forth in LAND 4001P-01,” and two of the inspections were completed outside of Procedure LAND 4001P-01’s inspection cycle timeframe, PG&E did not fully adhere to the work commitments in this target.
Corrective Action(s):	PG&E must supply a corrective action response addressing the deficiencies identified in the Distribution Second Patrol target, Defensible Space Inspections – Distribution Substation target, and Statement 2.

Response to Defensible Space Inspection – Distribution Substation Finding:

PG&E respectfully disagrees with the finding that we did not complete all work identified in Initiative 8.2.2.3.1 according to our guidelines. The two VM-05 Distribution Substation Defensible Space Inspections that took place in June of 2023 (Ridge Cabin, Inspection Date 6/6/2023 and Cabbage Patch SW Station, Inspection Date 6/12/2023) were inaccessible due to heavy snow and closed roads until after the timeframe established in Land-4001P-01. This is an example of “External Factors” as laid out in the 2023-2025 Wildfire Mitigation Plan (WMP) R4 page 370. After weather cleared and road conditions improved, PG&E accessed the sites and inspected the substations according to our procedures.

Please see the following attachments for photos and email conversation related to the inaccessibility of the substations in question:

- DRU15176_DS_Atch01_VM-05_RFE-DSI_CONF.pdf
- DRU15176_DS_Atch02_CP 051723 access.pdf
- DRU15176_DS_Atch03_CP 051723.pdf
- DRU15176_DS_Atch04_Ridge Cabin_051823.pdf

Programmatic Area	8.2.3 Vegetation and Fuels Management
Vegetation Management Initiative	8.2.3.2 Wood and Slash Management
Finding:	PG&E did not provide information consistent with the completion of all work identified in Initiative 8.2.3.2 Wood and Slash Management.
Statement 4	Debris less than 4 inches in diameter that is generated during pruning activities are chipped or lopped and scattered on the property in accordance with applicable regulations. Chips are left on site or removed off site based on owner preferences.
Corrective Action(s):	PG&E must supply a corrective action response addressing the deficiency identified in Statement 4 above.

Response to Statement 4:

PG&E acknowledges that in 2023 there was not a field in its legacy database for the tracking of debris management activities specifically. However, PG&E directs its vegetation management crews to complete debris treatment in coordination with tree work. This expectation is clearly defined in our contract specification, “Specific Conditions No. 5404 for Vegetation Management (VM) Tree Trimming and Brush Removal.” In 2023, although our crews did in fact complete debris treatment in coordination with tree work, the existing work management platform at that time did not accommodate separate and distinct documentation of debris treatment. When tree work was logged as completed in the database, it also implicitly included the completion of associated debris treatment.

For reference, here is a screenshot of the contract language from Exhibit J, Page 67 of the “Specific Conditions No. 5404 for Vegetation Management (VM) Tree Trimming and Brush Removal.”:

In Scope:	These units are used to fell trees and shall include, but not be limited to, the following:
	<p>Assumptions:</p> <ul style="list-style-type: none"> ○ Cut main stem as close to the ground as safely practical ○ Take down the tree from the ground, not requiring work aloft ○ Include herbicide stump treatment for sprouting species where not prohibited or refused by customer ○ Remove or mitigate all material 4" and less in diameter from work site and wood management (when prescribed) completed within 5 business days of tree work. Methods include but not limited to lop & scatter, remove, chip, chip & broadcast, etc. in accordance with BMPs. <p>Schedules will require manipulation to accommodate customer coordination and/or permitting constraints and meet compliance deadlines</p> <p>All work must be performed in accordance with PG&E Standards and Specifications.</p>

Programmatic Area	8.2.3 Vegetation and Fuels Management
Vegetation Management Initiative	8.2.3.4 Fall-in Mitigation
Finding:	PG&E did not provide information consistent with the completion of work identified in Initiative 8.2.3.4 Fall-in Mitigation.
Statement 8	From Section 8.2.2.2: “PG&E has implemented a plan to complete the identified dead/dying tree work [from PG&E’s Second Patrol Program] within 180 days for HFTD areas and within 365 days for non-HFTD areas.
Corrective Action(s):	PG&E must supply a corrective action response addressing the deficiencies identified in Statement 8 above.

Response to Statement 8:

PG&E agrees with the finding that not all identified dead/dying tree work under the PG&E’s Second Patrol Program in 2023 was conducted within 180 days for HFTD areas or 365 days for non-HFTD areas. A large portion of this work was delayed due to constraints, as further described below and in the attachment. As PG&E explained in initiative 8.2.1.2 in reference to targets including the Second Patrol Program, “All targets in the below Revised Table 8-14 and Revised Table 8-15 are subject to External Factors, which represent reasonable circumstances that may impact execution against targets including, but not limited to, physical conditions, landholder refusals, environmental delays, customer refusals or non-contacts, permitting delays/restrictions, weather conditions, removed or destroyed assets, active wildfire, exceptions or exemptions to regulatory/statutory requirements, and other safety considerations.”

Please see “*DRU15176_Statement 8_Atch01_1VMUpdate.xlsx*” for updated data on each tree identified in Statement 8.²

² Note: PG&E’s totals for work completed on time were different than those provided by Energy Safety, which results in different overall totals for HFTD and non-HFTD trees. PG&E completed work on time for 31,791 trees in the HFTD and 6,027 trees in the non-HFTD. Total overall HFTD prescriptions are 40,876. Total overall non-HFTD prescriptions are 6,813.

Regarding the 29 trees in the HFTD and 1 tree in the non-HFTD that showed work dates prior to inspection dates, this occurs in situations where a hazardous tree is identified and immediately mitigated in the field before the tree is input into our system of record. The date on a record is captured when the record is created and cannot be backdated.

Regarding the 4,802³ trees in the HFTD and 97⁴ trees in the non-HFTD that showed completion date after the targeted due date, work was completed late by tree crew vendors.

Regarding the 4,254⁵ trees in HFTD that had no reported work completion date and had been pending work for more than 180 days:

- 1,193 records were already approved to be worked, as shown in the original data set “DRU14286_Q017_Atch02_OneVM 2P DaD.xlsx” provided to Energy Safety to support the 2023 SVM audit, on the tab labeled “Question 17,” Column E “WOLISatus.”
- 33 records are approved to be worked after constraints were resolved, as shown in Column L “Updated Notification.”
- 1,316 records were affected by constraints, as shown in Column I “ConstraintTypes,” but have now been completed at the time of the data refresh, as shown in Column M “Updated Work Date.”
- 1,317 records remain constrained, as shown in Column L “Updated Notification.”
- 369 records have been updated to ‘Inspected, No Work’, as shown in Column L “Updated Notification.” Prescriptions may be later marked as not needed if our crews learn that work was completed by another program or upon closer inspection (previously impossible due to constraints) the prescription was deemed unnecessary, for example.
- 1 record has been updated to ‘Inspected, Prescribed’ after the constraint was resolved, as seen in Column L “Updated Notification.”
- 7 records have been updated to ‘Rejected’, as shown in Column L “Updated Notification,” meaning tree crews were unable to locate the tree for work.
- 18 records have been updated to ‘Scheduled’ for work, as prior constraints have since been resolved, as seen in Column L “Updated Notification.”

Out of the 1,317 HFTD records that remain constrained:

- 332 records are still constrained, as shown in Column O “Updated ITS Constraint,” due to Refusals, Environmental Review, or Agency Managed Lands.
- 17 records are constrained as a Clearance Request as shown in Column O “Updated ITS Constraint.” Clearance requests typically require coordination with Electric Operations to de-energize electric facilities so vegetation work can be performed safely. See Column R “Notes on Resolving Constraints” for notes regarding clearance request status.

³ Please note, in the original data set provided to Energy Safety to support the 2023 SVM audit, the tab labeled “DRU14286_Q017_Atch01_Legacy.xlsx” showed 1,576 trees in the HFTD with work completion dates more than 180 days after inspection; and the tab labeled “DRU14286_Q017_Atch02_OneVM 2P DaD.xlsx” showed 3,226 trees in the HFTD with work completion dates more than 180 days after inspection, for a total of 4,802 trees. Energy Safety showed 4,981 trees.

⁴Please note, in the original data set provided to Energy Safety to support the 2023 SVM audit, the tab labeled “DRU14286_Q017_Atch01_Legacy.xlsx” has 53 trees in the non-HFTD with work completion date more than 365 days after inspection and the tab labeled “DRU14286_Q017_Atch02_OneVM 2P DaD.xlsx” showed 44 trees with work completion date more than 365 days after inspection, for a total of 97 trees. Energy Safety showed 98 trees.

⁵ Please note, in the original data set provided to support the 2023 SVM audit, Energy Safety stated there were 3,063 trees in HFTD that had no reported work completion date. PG&E believes the actual count as of that time was 4,254.

- 645 records are listed as ‘In Environmental Review’ in Column R, indicating that the work is in process of being reviewed or processed by the PG&E Environmental team, before release to VM Operations.
- 49 records are listed as ‘Preparing Permit Application’ in Column R, indicating that required documents are in the process of being compiled to be submitted to CalTrans.
- 87 records are listed as ‘Released by ERTC/Permit’ in Column R, indicating that a constraint has been released via a permit, agreement, or ERTC, and is pending pre-work requirements before the constraint is released.
- 15 records are listed as ‘Returned to LOB’ in Column R, which indicates that the project is pending internal processing to clarify details of the project before the constraint can be resolved.
- 120 records are listed as ‘Submitted to Agency’ in Column R, indicating that project has been reviewed and is in-hand with agency for approval.
- 51 records are listed as ‘Submitted to AML/VegPermits’ in Column R, indicating that the constraint is being processed by the PG&E Agency Managed Lands or Encroachment Permitting teams.
- 1 record is listed as ‘In-Hand with CMT Fielding’ in Column R, meaning constraint has been issued to the central PG&E Constraints Management Team for in-field data collection and review.

Of the 387 trees in non-HFTD that had no reported work completion date and had been pending work for more than 365 days and the 301⁶ trees that had no reported work completion date, but had not been pending work for more than 365 days as of October 7, 2024, please see the following:

- 97 records were already approved to be worked, as shown in the original data set “DRU14286_Q017_Atch02_OneVM 2P DaD.xlsx” provided to Energy Safety to support the 2023 SVM audit, on the tab labeled “Question 17,” Column E “WOLISatus.”
- 240 records have been updated to completed at the time of the data refresh as seen in Column M “Updated Work Date.” Of those 239 records, 17 were not constrained but were completed before the due date, as shown in Columns M “Updated Work Date” and Q “Due Date Per Compliance.” The other 222 records were constrained, as shown in Columns I “ConstraintTypes” and O “Updated ITS Constraint.”
- 295 records remain constrained, as shown in Column L “Updated Notification.”
- 53 records have been updated to ‘Inspected, No Work’, as shown in Column L “Updated Notification.” Prescriptions may be later marked as not needed if our crews learn that work was completed by another program or upon closer inspection (previously impossible due to constraints) the prescription was deemed unnecessary, for example.
- 2 records have been updated to ‘Rejected’, as shown in Column L “Updated Notification,” meaning tree crews were unable to locate the tree for work.
- 1 record has been updated to ‘Scheduled’ for work now that the constraint from Column I has been resolved, as seen in Column L “Updated Notification.”

Out of the 295 records non-HFTD that remain constrained:

- 132 records are still constrained, as shown in Column O “Updated ITS Constraint,” due to Refusals, Environmental Review, or Agency Managed Lands.

⁶ Please note: Energy Safety identified 203 trees in non-HFTD that had no reported work completion date and had not been pending work for more than 365 days as of October 7, 2024. PG&E believes the actual count is 301.

- 1 record is constrained as a Clearance Request as shown in Column O “Updated ITS Constraint.” Clearance requests typically require coordination with Electric Operations to de-energize electric facilities so vegetation work can be performed safely. This clearance was delayed due to flooding and the tree being underwater.
- 127 records listed as ‘In Environmental Review’ in Column R, indicating that the work is in process of being reviewed or processed by the PG&E Environmental team, before release to VM Operations.
- 8 records listed as ‘Preparing Permit Application’ in Column R, indicating that required documents are in process of being compiled to be submitted to CalTrans.
- 12 records listed as ‘Released by ERTC/Permit’ in Column R, indicating that a constraint has been released via a permit, agreement, or ERTC, and is pending pre-work requirements before constraint is released.
- 3 records listed as ‘Returned to LOB’ in Column R, which indicates that the project is pending internal processing to clarify details of the project before constraint can be resolved.
- 6 Records listed as ‘Submitted to Agency’ in Column R, indicating that project has been reviewed and is in-hand with agency for approval.
- 6 records listed as ‘Submitted to AML/VegPermits’ in Column R, indicating that the constraint is being processed by the PG&E Agency Managed Lands or Encroachment Permitting teams.

To ensure visibility and tracking towards these timelines, a metric for dead and dying trees was incorporated into Vegetation Management’s Daily Operating Review (DOR) meetings. These DORs occur at senior leadership levels to maintain visibility of priorities and align on daily outcomes.

Programmatic Area	8.2.3 Vegetation and Fuels Management
Vegetation Management Initiative	8.2.3.8 Emergency Response Vegetation Management
Finding:	PG&E did not provide information consistent with the completion of all work identified in Initiative 8.2.3.8 Emergency Response Vegetation Management.
Statement 14	“All trees identified for work by pre-inspectors are prioritized. If vegetation is determined to be an immediate risk to PG&E facilities, described as a Priority 1 Condition in the VM Priority Tag Procedure (TD-7102P-17), the condition will be mitigated within 24 hours of identification as long as conditions are safe for the tree crew to proceed with work.”
Corrective Action(s):	PG&E must supply a corrective action response addressing the deficiencies identified in Statement 14 above.

Response to Statement 14:

PG&E agrees with the audit finding and deficiency identified in Statement 14 that there were 6 trees in 2023 that Energy Safety could not confirm were completed within one day of identification.

Of the 6 trees:

- 3 of the trees (Tree IDs -1055980534, -1056090269, and -1055980531) were completed on time but were marked completed late due to billing issues. Regarding billing delays, the tree work will show as pending until the contractors invoice it and PG&E approves payment. There are situations where the tree crew invoicing will accidentally select the bill date as the day the tree work was completed and not the actual tree work date. This can make things like priority trees appear past due.
- 1 tree (Tree ID -1056878378) was slightly delayed due to OEC activation. During times of OEC activation, the scheduling of all work including priority work is based on the direction of the OEC.
- 2 trees (Tree IDs -1056470590 and -1056063656) were verified to have been sent out through an internal Priority Tag area group chat on the day the work was identified, but there is no record of whether the work was completed on time.

The current mechanisms in place to promote timely completion of P1s include:

- PowerBI dashboards listing P1 due dates that are used by VM Regional Managers and Directors on their Daily Operating Reviews (DORs) for discussions with their teams. Please see *“DRU15176_Statement 14_Atch01_P1 Dash_CONF.pdf”* for dashboard screenshot.
- Daily emails delivered to highlight Priority tags that are coming due or are overdue. The email utilizes data derived from the same Priority 1 and 2 PowerBI Dashboards presented on the DORs. Please see *“DRU15176_Statement 14_Atch02_P Trees_CONF.pdf”* for email example.

Programmatic Area	8.2.6 Open Work Orders
Vegetation Management Initiative	8.2.6 Open Work Orders
Finding:	PG&E did not provide information consistent with the completion of all work identified in Initiative 8.2.6 Open Work Orders.
Statement 23	“Currently, there are time constraints in Second Patrol and on Priority Tag work. If an inspector determines that vegetation is an immediate risk to PG&E facilities the Priority Tag Utility Procedure is followed (TD-7102P-17). Under normal conditions, Priority 2 tags are issued for vegetation that is within MDR to the electric lines and must be mitigated within 20 business days.”
Corrective Action(s):	PG&E must supply a corrective action response addressing the deficiency identified in Statement 23 above.

Response to Statement 23:

PG&E agrees with the finding that 604 out of the total 81,984 trees with P2 conditions in 2023 were completed later than the 20 day-goal set by PG&E’s internal procedure. Please see Column AI (Reason for Completion after Compliance Due Date) on *“DRU15176_State23_Atch01_P2Update_CONF.xlsx.”* Of the 604 trees, the reasons for late completion dates after resolving the initial constraints are as follows:

- Bay – 87 Trees
 - 44 trees were late due to billing and/or delayed data entry by tree crew vendors*

- 10 trees were late due to additional constraints**
 - 33 trees were completed late by tree crew vendors
- Central Coast – 334 Trees
 - 20 trees were late due to billing and/or delayed data entry by tree crew vendors*
 - 108 trees were late due to additional constraints**
 - 206 trees were completed late by tree crew vendors
- Central Valley – 11 Trees
 - 1 tree was late due to billing and/or delayed data entry by tree crew vendors*
 - 7 trees were late due to additional constraints**
 - 1 tree was completed late by tree crew vendor
 - 2 trees work was no longer required because the property owners conducted the work themselves
- North Coast – 85 Trees
 - 15 trees were late due to billing and/or delayed data entry by tree crew vendors*
 - 51 trees were late due to additional constraints**
 - 19 trees were completed late by tree crew vendors
- North Valley – 36 Trees
 - 26 trees were late due to additional constraints**
 - 10 trees were completed late by tree crew vendors
- Sierra – 51 Trees
 - 9 trees were late due to billing and/or delayed data entry by tree crew vendors*
 - 39 trees were late due to additional constraints**
 - 3 trees were completed late by tree crew vendor

* Regarding billing and/or data entry delays, the tree work will show as pending until the contractors invoice it and PG&E approves payment. There are situations where the tree crew invoicing will accidentally select the bill date as the day the tree work was completed and not the actual tree work date. This can make things like priority trees appear past due.

** Additional constraints noted by tree crews may include weather delays, access issues, customer refusals, traffic control, etc., which arose after the initial constraint was resolved.

In recent years, PG&E has improved visibility and tracking of priority timelines, to reduce the number of late completion dates due to constraints or contractor delay. This includes:

- PowerBI dashboards listing P2 due dates that are used by VM Regional Managers and Directors on their Daily Operating Reviews (DORs) for discussions with their teams. Please see *“DRU15176_State 23_Atch02_P2 Dash_CONF.pdf”* for dashboard screenshot.
- Daily emails delivered to highlight Priority tags that are coming due or are overdue. The email utilizes data derived from the same Priority 1 and 2 PowerBI Dashboards presented on the DORs. Please see *“DRU15176_State 23_Atch03_P Trees_CONF.pdf”* for email example.

Programmatic Area	8.2.7 Workforce Planning
Vegetation Management Initiative	8.2.7.1-2 Workforce Planning
Finding:	PG&E did not provide information consistent with the completion of all work identified in Initiative 8.2.7 Workforce Planning.
Statement 24	"PG&E uses the completion of VMI Basics training to ensure minimum qualifications are met before contractors can perform work in the field."
Corrective Action(s):	PG&E must supply a corrective action response addressing the deficiency identified in Statement 24 above.

Response to Statement 24:

PG&E agrees with the finding that 77⁷ employees in 2023 performed work in the field prior to fully completing the VMI Basics training. These 77 incomplete assignments were missed due to human error. Previously, our Vegetation Management Structured Learning Path (SLP) trainings required manual assignment, tracking, and oversight by supervisors, which made it possible to lose track of when trainings were assigned and completed. To reduce this risk, in 2024, PG&E shifted the process of tracking trainings manually and conducting post-training audits to a new system of profiling trainings within the PG&E MyLearning system, which is part of the PG&E Academy.

With profiled trainings, users are automatically assigned trainings based on their roles. Once trainings are profiled, users will have a defined time to take and complete the course. With this system, users are also sent reminders to complete their profiled trainings on time, and their completion status is visible in PG&E's My Learning System. Confirmation of completed trainings can be easily conducted through this new profiled-trainings system. Training timeliness is also reviewed in Operating Reviews with supervisors and managers so that they can address with their teams as necessary.

⁷ Please note, in the original dataset provided to Energy Safety on October 7, 2024, Energy Safety noted there were 78 employees in 2023 who performed work in the field prior to completing the VEGM-0110 and VEGM-0110 WBT course, which was the final component of the VMI Basics training. PG&E believes the header in 'Row 1' was mistakenly included in the count, and the actual count as of that time was 77.