



18	OEIS	001	OEIS_001	8	OEIS_001_08	<p>Regarding PG&amp;E-208-18 Improving Vegetation Management Inspector Qualifications</p> <p>a. On page 208 of the 2020-2028 WMP, PG&amp;E discusses how it will improve the qualifications and training of VM inspectors. PG&amp;E states that it has implemented a process of profiling training courses within the VM organization based on personnel risk and internal employee or contractor data.</p> <p>b. Describe the profiling process.</p> <p>c. Define and explain the quality of "profiling training courses."</p>	Nathan Poon	4/8/2025	4/1/2025				NA	9	Vegetation Management & Inspections	9.13
19	OEIS	001	OEIS_001	9	OEIS_001_09	<p>Regarding PG&amp;E-208-19 Distribution Realtime Patrol Program</p> <p>a. On page 204, PG&amp;E's WMP states PG&amp;E is in the process of evaluating which component(s) of the Focused Tree Management (FTM) and Tree Removal Strategy (TRS) scope will be incorporated into the Distribution Realtime Patrol Program. This analysis will be based on findings from efficiency studies planned to be performed in 2025. PG&amp;E will incorporate VMOM into activities described in Active Distribution Patrol Program.</p> <p>b. Does PG&amp;E have specific, measurable, achievable, relevant, and time-bound (SMART) targets for evaluating which component(s) of the FTM and TRS scope will be incorporated into the Distribution Realtime Patrol Program. The efficiency study, and incorporating VMOM into Activities Based on Weather Conditions?</p> <p>c. If yes, provide those SMART targets.</p> <p>d. If not, explain why PG&amp;E does not have SMART targets for its plan to consolidate its vegetation inspection programs for distribution circuits in the HFTD.</p> <p>e. Provide the procedures for these efficiency studies.</p> <p>f. When does PG&amp;E expect to determine which components of the FTM and TRS scope will be incorporated into the Distribution Realtime Patrol Program?</p> <p>g. When does PG&amp;E expect to have Distribution Realtime Patrol Program procedures that</p>	Nathan Poon	4/8/2025	4/1/2025				NA	9	Vegetation Management & Inspections	9.2.1
20	OEIS	001	OEIS_001	10	OEIS_001_010	<p>Regarding PG&amp;E-208-20 Prioritization</p> <p>a. On page 217, PG&amp;E's WMP states PG&amp;E is examining work prioritization categories beyond the P1, P2, and Routine designation. For this examination:</p> <p>b. Provide examination criteria.</p> <p>c. Provide descriptions of work prioritization categories under examination.</p> <p>d. Provide a description of the parts of the service territory these new designations will apply to including the reason these parts of the service territory would benefit from additional prioritization categories.</p> <p>e. Provide a schedule for and anticipated completion date of this examination.</p> <p>f. Provide an anticipated effective date of the new prioritization category scheme (i.e., when the prioritization scheme will be implemented in the field).</p>	Nathan Poon	4/8/2025	4/1/2025				NA	9	Vegetation Management & Inspections	9.3
21	OEIS	001	OEIS_001	11	OEIS_001_011	<p>Regarding PG&amp;E-208-21 Data Quality</p> <p>a. On page 220-226 of its WMP, PG&amp;E provides qualitative target ES-01.</p> <p>b. Provide the current data quality, profiling, and monitoring practices used for VM data.</p> <p>c. Provide the data quality, profiling, and monitoring practices planned for use under ES-01.</p>	Nathan Poon	4/8/2025	4/1/2025				NA	12	Enterprise Systems	12.2
22	OEIS	001	OEIS_001	12	OEIS_001_012	<p>Regarding PG&amp;E-208-22 Reinspection of Trees in New Electrical Territory</p> <p>a. On page 227 of its WMP, PG&amp;E provides a response to PG&amp;E-2014-12 indicating "In late 2024, PG&amp;E began planning a pilot to re-evaluate trees listed for work within Shasta County."</p> <p>b. Provide pilot study procedures.</p> <p>c. Provide pilot schedule.</p> <p>d. Provide any audit results.</p>	Nathan Poon	4/8/2025	4/1/2025				NA	9	Vegetation Management & Inspections	9.2.1
23	OEIS	001	OEIS_001	13	OEIS_001_013	<p>Regarding Wood and Shrub Management Tracking</p> <p>a. Section 3.3.3 of PG&amp;E's 2020-2028 WMP states that "Data management is completed in coordination with tree work across PG&amp;E's service area. Wood management that is conducted in response to a customer request is typically completed within 90 days of tree work project completion across PG&amp;E's service area, unless affected by weather, land conditions, or other considerations" (p. 381).</p> <p>b. Does PG&amp;E document and track the management of dead and woody debris that is a byproduct of VM work?</p> <p>c. If yes:</p> <p>d. Describe the documentation and record keeping methods used.</p> <p>e. List the data fields that are recorded as part of the wood and dead debris management tracking process.</p> <p>f. Are there PG&amp;E's separate wood and dead debris management is completed in all VM treatment areas according to the Utility Standard, TD-T1165 and Utility Procedures, TD-T116P-01.</p> <p>g. Does PG&amp;E plan to integrate wood and dead debris management tracking into internal procedures similar to tracking the completion of other VM orders.</p>	Nathan Poon	4/8/2025	4/1/2025				NA	9	Vegetation Management & Inspections	9.5
24	OEIS	001	OEIS_001	14	OEIS_001_014	<p>Regarding Wood and Shrub Management Impacts on Wildlife Risk</p> <p>a. PG&amp;E-208-16, Updating Wood Management Procedures, requires an updated Wood Management Procedure that "Schedules the wildlife risk related to accumulated fuels generated by PG&amp;E's vegetation management activities." On page 208 of its WMP, PG&amp;E states that updates to Utility Standard, TD-T1165 and Utility Procedures, TD-T116P-01 include "alignment to industry practices related to accumulated fuels generated by VM activities."</p> <p>b. Clearly state industry practices PG&amp;E is referring to.</p> <p>c. Explain how wildlife risk related to accumulated fuels generated by PG&amp;E's vegetation management activities is presented in Utility Standard, TD-T1165 and Utility Procedures, TD-T116P-01.</p>	Nathan Poon	4/8/2025	4/1/2025				NA	9	Vegetation Management & Inspections	9.5
25	OEIS	001	OEIS_001	15	OEIS_001_015	<p>Regarding Wood and Shrub Management Benchmarking</p> <p>a. In response to PG&amp;E-208-16, Updating Wood Management Procedures, PG&amp;E states that benchmarking meetings with SCE and SOG&amp;E to discuss wood management began in 2023 (p. 586) and benchmarking is targeted to be completed by September 30, 2028 (p. 344). These discussions with SCE and SOG&amp;E and a review of delivery procedures have "helped shape the new Wood Management Standard and Procedures, though "absent a consistent approach across utilities, PG&amp;E aligned and updated our Standard and Procedures to reflect the common ground of PSC 4221" (p. 586). Future benchmarking meetings topics are expected to include consideration of whether such utility's respective wood management entity meet the required progress defined in the area for continued improvement" (p. 587).</p> <p>b. Explain why PG&amp;E plans for the benchmarking effort spans over five years.</p> <p>c. Describe common and uncommon practices between PG&amp;E, SCE, and Liberty that have been identified during the benchmarking effort, explain how each uncommon practice was determined to be included or excluded from PG&amp;E's updated Utility Standard, TD-T1165 and Utility Procedures, TD-T116P-01.</p> <p>d. Describe specific outcomes from the benchmarking effort and clarify how those outcomes relate to specific updates in the Utility Standard, TD-T1165 and Utility Procedures, TD-T116P-01.</p> <p>e. Compare PG&amp;E's past wood management procedure prior to benchmarking to the updated wood management procedure and describe how the updates to the procedure meet the required progress of PG&amp;E-208-16.</p>	Nathan Poon	4/8/2025	4/1/2025				NA	9	Vegetation Management & Inspections	9.5
26	OEIS	001	OEIS_001	16	OEIS_001_016	<p>Regarding 1/2025 VM Reinspection</p> <p>a. PG&amp;E's WMP indicates that "The TMM, previously worked RWAs are reassessed every 2-5 years" (p. 586). The 2020-2028 WMP does not describe how the need for reassessment of Transmission RWAs is determined. In contrast, PG&amp;E's 2022-2026 WMP provided the criteria for reassessment of reinspection, including "Incapacitated vegetation exceeding 3 ft in height and/or when incipient vegetation is greater than 50 percent coverage within the ROW" (p. 585).</p> <p>b. Describe the rationale conducting reassessment inspection on a 2-5 year cycle and clarify what factors (e.g., height, growth rate, percent cover, height) were used to define the thresholds.</p> <p>c. Clarify the threshold triggers PG&amp;E will use to determine the need for reassessment of vegetation in transmission Right-of-Way (ROW) areas.</p>	Nathan Poon	4/8/2025	4/1/2025				NA	9	Vegetation Management & Inspections	9.7.2
27	OEIS	001	OEIS_001	17	OEIS_001_017	<p>Regarding Covered Conductor, Line Removal and Mitigation</p> <p>a. On page 201 of its 2020-2028 Base WMP, PG&amp;E states PG&amp;E's System Hardening GH-12 initiative includes overhead hardening mitigations, specifically covered conductor installation and line removal, including remote grids."</p> <p>b. Provide separate targets for the following initiatives in the same table format as Table 6-1.</p> <p>c. Covered Conductor</p> <p>d. Line Removal</p> <p>e. Mitigation</p>	Nathan Poon	4/8/2025	4/1/2025				NA	8	Grid Design, Operations, Maintenance	8.2.18.2.88.2
28	OEIS	001	OEIS_001	18	OEIS_001_018	<p>Regarding Line Transmission Power Lines</p> <p>a. How many circuit miles of line transmission lines does PG&amp;E have in the HFTD and HFRA?</p> <p>b. Do any of these line transmission lines run parallel, and if close proximity to energized transmission lines?</p> <p>c. Are any of these line transmission lines planned for removal in 2025 to 2028?</p> <p>d. If yes, provide targets for 2025, 2027, and 2028.</p> <p>e. If no, explain.</p> <p>f. Explain why removal is not planned.</p> <p>g. Explain if any of these lines could become energized through induction.</p>	Nathan Poon	4/8/2025	4/1/2025				NA	8	Grid Design, Operations, Maintenance	8.2.8.1
29	OEIS	001	OEIS_001	19	OEIS_001_019	<p>Regarding CC and Underpinning in the Redleaf Area</p> <p>a. On page 191 of its WMP, PG&amp;E states, "PG&amp;E often refers to areas that have been inspected directly by wildlife before an HFTD as 'The Redleaf' work. Work in areas inspected by wildlife outside of an HFTD area is referred to as 'Community Redleaf' work." Provide the targets for the "Overhead Hardening and Line Removal - Distribution (GH-12)" and "System Hardening - Underpinning (GH-04)" activities for 2025 to 2028 which are designated as "The Redleaf" or "Community Redleaf." Provide your response in the table below.</p>	Nathan Poon	4/8/2025	4/1/2025				NA	8	Grid Design, Operations, Maintenance	8.2.18.2.2
30	OEIS	001	OEIS_001	20	OEIS_001_020	<p>Regarding the CBR Calculation in Area for Continued Improvement PG&amp;E-2014-04</p> <p>a. In response to Area for Continued Improvement PG&amp;E-2014-04, PG&amp;E discusses the methodology used for the CBR calculation on page 572. This discussion does not include how PG&amp;E calculated the "eyes-on-risk" achieved by a detailed aerial scan inspection and aerial scan inspection.</p> <p>b. Does PG&amp;E estimate that an aerial scan achieves the same eyes-on-risk as a detailed aerial inspection?</p> <p>c. If yes, discuss how PG&amp;E determined an aerial scan achieves the same eyes-on-risk as a detailed aerial inspection. The discussion must include a description of differences in the process and execution of aerial scans vs. aerial inspections (i.e., photographic location, equipment required to be photographed, photograph quality per inspection, photograph clarity requirements, reviewer inspection checklist, etc.).</p> <p>d. If no, provide the following calculations:</p> <p>1. The eyes-on-risk of a detailed aerial inspection on an asset in an area of extreme consequence and extreme wildfire risk.</p> <p>2. The eyes-on-risk of an aerial scan inspection on the same asset.</p> <p>3. The eyes-on-risk of a detailed aerial inspection on an asset in an area of severe consequence and severe wildfire risk.</p> <p>4. The eyes-on-risk of an aerial scan inspection on the same asset.</p> <p>5. The eyes-on-risk of a detailed aerial inspection on an asset in an area of high consequence and high wildfire risk.</p> <p>6. The eyes-on-risk of an aerial scan inspection on the same asset.</p>	Nathan Poon	4/8/2025	4/1/2025				NA	ACI PG&E-25U-04	ACI PG&E-25U-04	ACI PG&E-25U-04
31	OEIS	001	OEIS_001	21	OEIS_001_021	<p>Regarding Aerial Scan Inspections</p> <p>a. On page 228 of its 2020-2028 Base WMP, PG&amp;E states that aerial scan inspections will be implemented to get additional eyes-on-risk in the riskiest areas. PG&amp;E states that the inspection will consist of a review of a "beamed-in set of photos, intended to enable the identification of the conditions... that put the 'highest wildfire risk.'" Provide a comprehensive list of the differences between aerial scan and aerial distribution detailed inspections (i.e., the number of photographs taken, the equipment photographed, the distance from camera to equipment being photographed, the number of photographs being reviewed, items on the reviewer's inspection checklist, etc.) Provide documentation that supports the list of differences (e.g., photo, inspection checklist, etc.).</p>	Nathan Poon	4/8/2025	4/1/2025				NA	8	Grid Design, Operations, Maintenance	8.3.8.3.4
32	OEIS	001	OEIS_001	22	OEIS_001_022	<p>Regarding Real Time Sensors</p> <p>a. On page 227 of its 2020-2028 Base WMP, PG&amp;E states that it is piloting real time sensors that may collect data that the future can be used in lieu of aerial scan inspections.</p> <p>b. Provide a list of sensors that are being piloted from 2020-2028.</p> <p>c. For each sensor provide the following information:</p> <p>1. Manufacturer</p> <p>2. Model number/type</p> <p>3. Data the sensor records/transmits (voltage, current, power quality, temperature, vibration, etc.)</p> <p>4. Current phase of pilot (planning, execution, evaluation, scaling)</p> <p>5. Anticipated completion date of pilot activities</p>	Nathan Poon	4/8/2025	4/1/2025				NA	10	Situational Awareness and Forecasting	10.4.10.31
33	OEIS	001	OEIS_001	23	OEIS_001_023	<p>Regarding PG&amp;E-208-23 Overall Service Territory Risk</p> <p>a. On page 147 of the 2020-2028 Base WMP, PG&amp;E provides Figure 6-1: Projected Overall Service Territory Risk, showing the residual risk over time with resiliency mitigations and operational mitigations.</p> <p>b. Provide similar versions of this figure showing the associated projected risk reduction for wildfire risk, PSPS risk, and PG&amp;E risk.</p> <p>c. From 2025 to 2028, PG&amp;E shows a projected reduction in overall utility risk of approximately nine percent when accounting for resiliency mitigations, but only a reduction of approximately one percent when accounting for operational mitigations and resiliency mitigations together.</p> <p>d. Provide the actual projected residual risk percentages broken out by year from 2025 to 2028 for both only resiliency mitigations as well as resiliency and operational mitigations.</p> <p>e. Explain why there is a smaller residual risk reduction when incorporating operational mitigations.</p>	Nathan Poon	4/8/2025	4/1/2025				NA	6	Wildfire Mitigation Strategy Development	6.2.1.1

