PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigations Plans Discovery 2026-2028
Data Response

PG&E Data Request No.:	OEIS_001-Q015
PG&E File Name:	WMP-Discovery2026-2028_DR_OEIS_001-Q015
Request Date:	April 8, 2025
Requester DR No.:	OEIS-P-WMP_2025-PGE-001
Requesting Party:	Office of Energy Infrastructure Safety
Requester:	Nathan Poon
Date Sent:	April 11, 2025

SUBJECT: REGARDING WOOD AND SLASH MANAGEMENT BENCHMARKING

QUESTION 015

In response to PG&E-23B-16, Updating Wood Management Procedure, PG&E states that benchmarking meetings with SCE and SDG&E to discuss wood management began in 2023 (p. 586) and benchmarking is targeted to be complete by September 30, 2028 (p. 354). These discussions with SCE and SDG&E and a review of Liberty's procedure have "helped shape" the new Wood Management Standard and Procedure, though, "absent a consistent approach across utilities, [PG&E] aligned and updated our Standard and Procedure to reflect the common ground of PRC 4291" (p. 586). Future benchmarking meeting topics are expected to include consideration of whether each utility's respective wood management policy meet the required progress defined in the area for continued improvement (p. 587).

a. Explain why PG&E plans for the benchmarking effort spans over five years.
b. Describe common and uncommon practices between PG&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&E's updated Utility Standard, TD-7116S and Utility Procedure, TD-7116P-01.
c. Describe specific outcomes from the benchmarking effort and clarify how these outcomes relate to specific updates in the Utility Standard, TD-7116S and Utility Procedure, TD-7116P-01.
d. Compare PG&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&E-23B-16.

Answer 015

a. We initiated a benchmarking discussion with SCE and SDG&E in 2023 as a singular occurrence. However, as indicated in our response to PG&E-23B-16, we intend to hold further discussions with our partner IOUs and Liberty Utilities to

gain additional insights on wood management best practices in the spirit of continuous improvement. We anticipate benchmarking according to the following timeline:

Step 1: Benchmark development (Q1 2026 – Q2 2026)

Step 2: Execute benchmark (Q3 2026 – Q4 2026)

Step 3: Analyze results and propose procedure recommendations, if applicable (End of Q4 2027)

Step 4: Report results (End of Q4 2028)

b. Our 2023 benchmarking effort included representatives from SCE and SDG&E. We met with these other utilities on July 17, 2023. However, we did not request nor gain approval to circulate responses beyond the participants of the benchmark. PG&E responded to the following questions as shared below:

i. What type of vegetation fuel management programs does PG&E have in place to dispose woody debris?

- At the time of tree work, PG&E chips and removes, chips and spreads on site or lops and scatters on site all debris that is less than 4” in diameter.
- Unless requested, wood larger than 4” in diameter is left in a safe position on site as it is legally the property of the landowner. Wood management is offered in specific circumstances.
- Large-diameter wood is often processed via grinding and those chips are hauled to biomass facilities. Biomass facilities are more common in certain areas of the northern portion of PG&E’s service territory.
- We are constantly working with vendors and communities to identify viable disposal methods and outlets that are environmentally sound.
- There is more infrastructure for biomass in the northern portion of our service territory. Other areas like the Santa Cruz Mountains, present a challenge as there no infrastructure. (See Q&A 3)

ii. Does PG&E track the tonnage of vegetation recycled, and if so, what is the methodology (e.g., very granular, or assumption based using tree count)?

- Our vendors legally dispose of wood material in the most efficient and cost-effective manner, and we do not comprehensively track the volume that leaves a vendor’s wood yard.
- Large-diameter wood is often processed via grinding and those chips are hauled to biomass facilities. Biomass facilities are more common in certain areas of the northern portion of PG&E’s service territory.
- We do have certain data points which could provide insight particularly for material that is moved through PG&E-supported wood yards.

iii. Where does most of PG&E’s woody debris get disposed?

- If debris is not spread or scattered on site for accessibility reasons or if requested by the customer, it typically ends up at biomass facilities.

- The final destination of material designated for hauling offsite varies and is highly dependent on infrastructure options available at each locale.
- We are exploring new options for processing material including the use of air curtain burners, carbonators, pyrolysis and bio-oil technologies.

iv. Is there interest in or use of cogeneration for woody debris, or other value-added end use?

- Yes. Some of our material is currently routed to this type of facility.

c. The result of benchmarking with SCE and SDG&E helped shape and contribute to our new Wood Management Standard and Procedure. Our past wood management procedure – Utility Procedure TD-7102P-26 – was developed to help gain customer concurrence exclusively with Enhanced Vegetation Management (EVM) tree work. Under the new Standard and Procedure, wood management may be offered within a defined scope to all customers and land managers upon request across all Vegetation Management programs.

d. Please see response to c.