

May 16, 2025

BY ELECTRONIC COMMUNICATION

Tony Marino, Deputy Director  
Office of Energy Infrastructure Safety  
California Natural Resources Agency  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

Re: **Submission of PG&E's 2026-2028 Wildfire Mitigation Plan Non-Substantive Errata**

Deputy Director Marino:

Pursuant to Section 7 of Office of Energy Infrastructure Safety (Energy Safety) Policy Division Process Guidelines (Process Guidelines), Pacific Gas and Electric Company (PG&E) hereby submits its non-substantive errata for the 2026-2028 WMP.

The errata are as follows:

- Attachment 1: Table of identified substantive errata including narrative updates and corrections, table updates, and expenditure corrections.
- Attachment 2: Updated Table 3-1: List of Risks and Risk Drivers to Prioritize
- Attachment 3: Updated Table 3-3: Summary of Projected WMP Expenditures (Thousands Of Dollars)
- Attachment 4: Updated Figure PG&E-5.1.1-2: Risk Bow Tie for Wildfire Risk
- Attachment 5: Updated Table PG&E-8.2.1-4: Covered Conductor and Undergrounding Impacts on the Likelihood Of Ignition
- Attachment 6: Updated Table 9-6: Vegetation Management QA and QC Activity

The corrections noted above were identified during our review of the 2026-2028 WMP as well as during the discovery process. Please let us know if you need any additional materials or clarifications.

Sincerely,

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Jay Leyno  
Director, Wildfire Mitigation PMO

## Attachment 1

### Errata to Pacific Gas and Electric Company's 2026-2028 Wildfire Mitigation Plan

	Issue/Reason for Correction	Location of Issue in the 2026-2028 WMP	Adjustment(s) Made
1	Narrative update to correct typo/capitalization error	List of Tables: Table PG&E-8.6.2-1, P. xxii	TABLE PG&E-8.6.2-1: ANNUAL FORECASTED CREATIONS AND <del>closure</del> CLOSURE VOLUME
2	Narrative update to remove irrelevant table reference	Section 5.2.2.2: Consequence of Risk Event, P. 69	VOSc -value of service per customer class ( <del>see Table PG&amp;E 5.2.2 2 above</del> )
3	Narrative update to correct prompt formatting	Section 6.2.1.2: Risk Impact of Activities, P. 150	<i>The electrical corporation must calculate the overall expected effectiveness for risk reduction of each of its activities. The overall expected effectiveness is the expected percentage for the average amount of risk reduced by the activity. This must be calculated for overall utility risk, being a summation for wildfire risk and outage program risk, as well as wildfire risk and outage program risk, respectively.</i> <i>The electrical corporation must provide the cost benefit score, broken out by overall utility risk, wildfire risk, and outage program risk. The score should be calculated for the activity overall based on overall average activity effectiveness and average unit costs.</i>

	Issue/Reason for Correction	Location of Issue in the 2026-2028 WMP	Adjustment(s) Made
			<p><i>The electrical corporation must calculate the expected % HFTD/HFRA covered for each of its initiative activity targets over the WMP cycle. The expected % HFTD/HFRA covered is the percentage of HFTD and HFRA being worked on by the given activity from the first year of the Base plan to the last year of the Base plan. This could include the number of circuit miles or the number of assets. For example:</i></p> <p><i>For covered conductor installations, the expected installations from January 1, 2026, through December 31, 2028 = 600 circuit miles</i></p> <p><i>The total number of miles within the HFTD and HFRA = 4,250 circuit miles</i></p> <p><i>The expected % HFRA covered for the covered conductor installations activity from 2026 to 2028 is:</i></p> <p><i>The electrical corporation must calculate the expected % risk reduction of each of its activity targets over the WMP cycle. The expected % risk reduction is the expected percentage risk reduction for the last day for Base WMP implementation compared to the first day for Base WMP implementation. For example:</i></p> <p><i>For protective devices and sensitivity settings, the total risk on January 1, 2026 = <math>2.59 \times 10^{-1}</math></i></p> <p><i>After meeting its planned activity targets for protective devices and sensitivity settings, the total risk on December 31, 2028 = <math>1.29 \times 10^{-1}</math></i></p> <p><i>The expected x% risk reduction for the protective devices and sensitivity settings activity in 2026 is:</i></p> <p><i>The electrical corporation must discuss how it determined the total risk after implementation (the “risk after” component above). For instance, this could include estimating based on subject matter expertise, calculating based on historical observed reduction of ignitions, or using established understandings of</i></p>

	Issue/Reason for Correction	Location of Issue in the 2026-2028 WMP	Adjustment(s) Made
			<p>effectiveness based on industry usage. The expected % risk reduction numbers must be reported for each planned activity, when required, in the specific mitigation category sections of Sections 8 12 (see example tables in these Sections). Table 6 3 provides an example of a summary of reporting on the expected % risk reduction of activities.</p> <p>The electrical corporation must also provide a step by step calculation showing how it derived the values provided below, similar to the examples shown above.</p>
4	Narrative update to correct numbering error	Section 8.2: Grid Design and System Hardening, P. 177	<p>1) Covered conductor (CC) installation; <del>Undergrounding of electric lines and/or equipment;</del></p> <p>2) Undergrounding of electric lines/or equipment;</p> <p>3) Distribution pole replacements and reinforcements;</p> <p>4) Transmission pole/tower replacements and reinforcements;</p> <p>5) Traditional OH hardening;</p> <p>6) Emerging grid hardening technology installations and pilots;</p> <p>7) Microgrids;</p> <p>8) Installation of system automation equipment;</p> <p>9) Line removal (in the HFTD);</p> <p>10) Other grid topology improvements to minimize risk of ignitions;</p> <p>11) Other grid topology improvements to mitigate or reduce Public Safety Power Shutoff (PSPS) events;</p> <p>12) Other technologies and systems not listed above; and</p> <p>13) Status updates on additional technologies being piloted</p>
5	Narrative update to include HFRA language	Section 9.11: Quality Assurance and Quality Control, P. 411, 412	<p>In HFTD/<del>HFRA</del>, VMQC samples are sourced from completed VM inspected and/or tree work locations. See VM-22D; VM-22P; VM-22T in <a href="#">Table 9-6</a> for more information.</p> <p>VMQA and VMQC audit locations are sampled from HFTD/<del>HFRA</del> areas.</p>

	<b>Issue/Reason for Correction</b>	<b>Location of Issue in the 2026-2028 WMP</b>	<b>Adjustment(s) Made</b>
6	Table updated to total 100% in x% of Ignitions in HFTD/HFRA (2015-2024) column	Table 3-1: List of Risks and Risk Drivers to Prioritize, P. 20-21	Replaced Table 3-1 with updated risk drivers and percentages. Most changes are reflected in column “% of Ignitions in HFTD/HFRA (2015-2024).”  See Attachment 2 below.
7	Table update to refine its forecast in alignment with upcoming General Rate Case	Table 3-3: Summary of Projected WMP Expenditures (Thousands of Dollars), P. 23	Replaced table with updated projected spend numbers.  See Attachment 3 below.
8	Figure update to reflect accurate exposure miles number	Figure PG&E-5.1.1-2: Risk Bow Tie For Wildfire Risk, P. 47	Replaced Figure PG&E-5.1.1-2 with correct exposure miles  See Attachment 4 below.
9	Table updated to remove unnecessary line item and incorporate language into correct category	Table PG&E-8.2.1-4: Covered Conductor And Undergrounding Impacts On The Likelihood Of Ignition, P. 193-194	Replaced table with removal of Risk Driver: Wire-to-wire Contact and included language in correct Risk Driver, Equipment Failure  See Attachment 5 below.
10	Table updated with correct population size for VM-22P	Table 9-6: Vegetation Management QA and QC Activity, P. 410	Replaced table with updated population size for Vegetation Management Quality Control-Pole Clearing (VM-22P).  See Attachment 6 Below

## Attachment 2

**Table 3-1: List of Risks and Risk Drivers to Prioritize**

Priority	Risk	Risk Diver	Risk Sub-Driver	x% of Ignitions in HFTD/HFRA <sup>[i]</sup>	Topographical and Climatological Risk Factors
1	Wildfire	Vegetation Contact	Vegetation - Branch	<del>16.5%</del> 12.5%	Extreme weather, wind
1	Wildfire	Vegetation Contact	Vegetation – Trunk	<del>13.5%</del> 14.4%	Extreme weather, wind
1	Wildfire	Vegetation Contact	Vegetation – Other	<del>8.7%</del> 6.9%	Extreme weather, wind
2	Wildfire	Equipment Failure	Anchor/guy	0.1%	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Capacitor bank	<del>0.8%</del> 2.4%	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Conductor	<del>8.8%</del> 12.1%	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Connector device	<del>4.1%</del> 5.7%	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Cross arm	<del>1.2%</del> 1.7%	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Fuse	<del>2%</del> 3.4%	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Cutout	See “Fuse”	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Insulator and bushing	<del>1.9%</del> 1.5%	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Lightning arrestor	<del>0.2%</del> 0.7%	Extreme weather, heat, wind

Priority	Risk	Risk Diver	Risk Sub-Driver	x% of Ignitions in HFTD/HFRA <sup>[1]</sup>	Topographical and Climatological Risk Factors
2	Wildfire	Equipment Failure	Pole	<del>2.1%</del> 4.0%	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Recloser	<del>0.3%</del> 1.1%	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Relay	See "Sectionalized"	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Sectionalized	>0.1%	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Splice	See "Conductor"	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Switch	1.0%	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Transformer	<del>2.8%</del> 1.7%	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Voltage Regulator	<del>0.7%</del> 0.6%	Extreme weather, heat, wind
2	Wildfire	Equipment Failure	Other - Equipment failure	<del>5.9%</del> 1.5%	Extreme weather, heat, wind
3	Wildfire	Contact from object	Animal Contact	<del>7.9%</del> 9.6%	N/A
3	Wildfire	Contact from object	Balloon Contact	<del>1.1%</del> 1.7%	wind
3	Wildfire	Contact from object	Land Vehicle Contact	<del>5.5%</del> 5.6%	N/A
3	Wildfire	Contact from object	Aircraft Vehicle Contact	See "Other – Contact from object"	N/A
3	Wildfire	Contact from object	Third Party Contact	See "Other – Contact from object"	N/A

Priority	Risk	Risk Diver	Risk Sub-Driver	x% of Ignitions in HFTD/HFRA <sup>[i]</sup>	Topographical and Climatological Risk Factors
3	Wildfire	Contact from object	Other - Contact from object	<del>2.5%</del> 3.7%	N/A
4	Wildfire	Wire to wire contact	N/A	<del>0.3%</del> 1.5%	Heat, Wind
4	Wildfire	Contamination	N/A	<del>4%</del> 2.1%	Precipitation, heat, wind N/A
4	Wildfire	Protective Device Operation	N/A	See "Utility work/operation"	N/A
4	Wildfire	Vandalism/theft	N/A	<del>0.6%</del> 0.1%	N/A
4	Wildfire	Utility work/operation	N/A	<del>2.0%</del> 0.3%	N/A
4	Wildfire	Lightning	N/A	See "All Other"	Precipitation, lightning N/A
4	Wildfire	Unknown	N/A	<del>1.3%</del> 2.8%	N/A
4	Wildfire	Dig-in	N/A	See "All Other"	N/A
4	Wildfire	All Other	N/A	1.4%	N/A

[i] The percentage of ignition in HFTD/HFRA is based on 2015-2024 data.



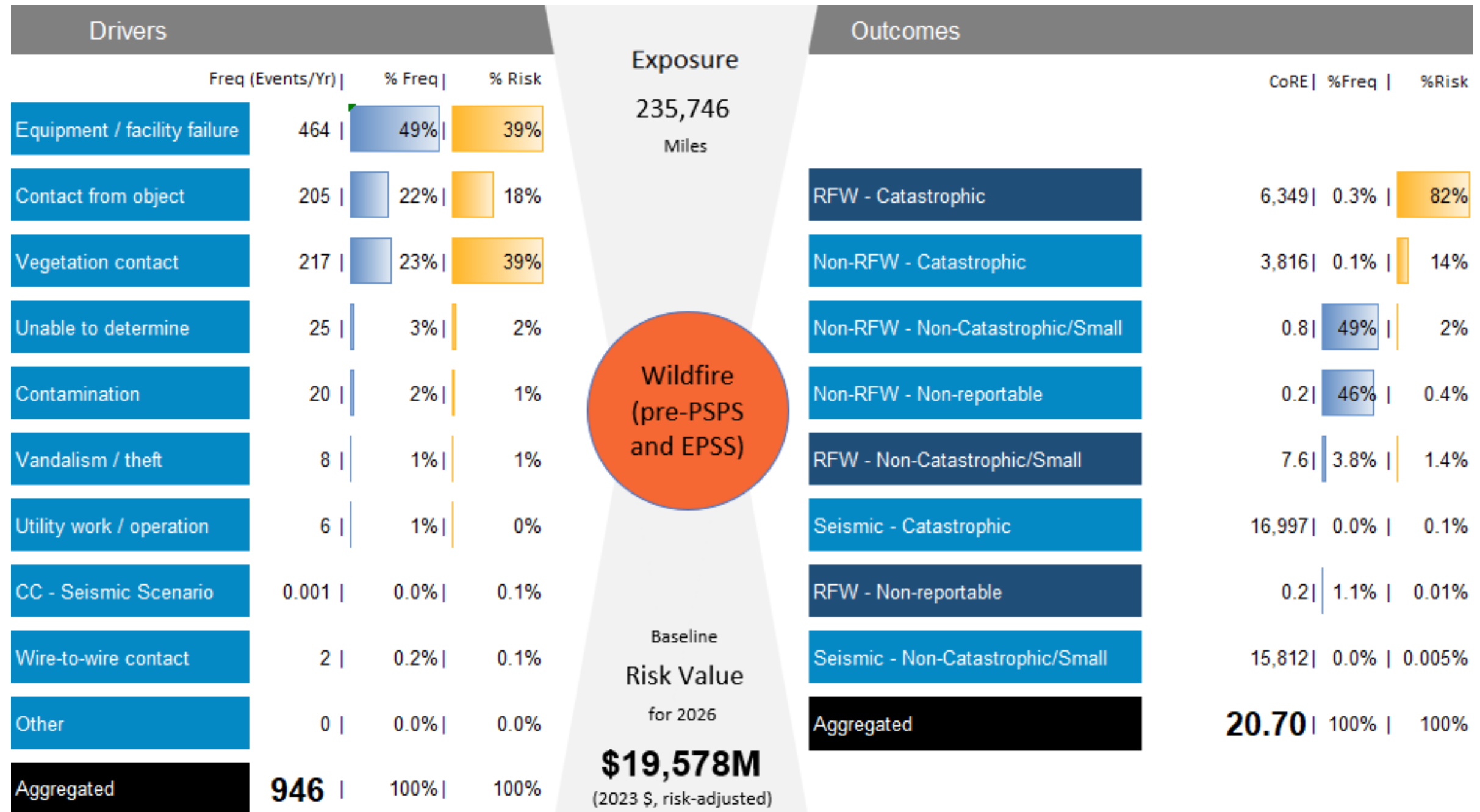
### Attachment 3

**Table 3-3: Summary Of Projected WMP Expenditures  
(Thousands Of Dollars)**

Year	Projected Spend
2026	<del>\$5,516,713</del> \$5,466,897
2027	<del>\$6,149,631</del> \$6,327,677
2028	<del>\$6,626,139</del> \$6,804,746

## Attachment 4

Figure PG&E-5.1.1-2: Risk Bow Tie For Wildfire Risk



Attachment 5

Table PG&E-8.2.1-4: Covered Conductor And Undergrounding Impacts On The Likelihood Of Ignition

Risk Driver	Description	Covered Conductor with Enhanced Powerline Safety Setting and Downed Conductor Detection	Underground Primary	Underground Primary and Secondary Lines and Services (Underground All)
Equipment Failure	Events where failure of a PG&E asset, such as a conductor, arrester, insulator, breaker, transformer, etc., caused an ignition. This includes ignitions caused by wire-to-wire contact, commonly known as line slap.	<p><u>Very High</u>: The likelihood of ignition due to damage or failure of connection device, fuse, lightening arrester, switch, and transformer</p> <p><u>High</u>: The likelihood of ignition due to damage or failure of anchor/guy, crossarm, insulator and brushing, and pole damage.</p> <p><u>Medium High</u>: The likelihood of ignition due to damage or failure of capacitor bank, recloser, and sectionalizer.</p> <p><u>Medium</u>: The likelihood of ignition due to damage or failure of voltage regulator and secondary damage or failure.</p>	<p><u>All</u>: The likelihood of ignition due to damage or failure of anchor/guy, capacitor bank, connection device, crossarm, fuse, insulator and brushing, lightning arrester, pole damage, recloser, sectionalizer, switch, transformer, and voltage regulator.</p> <p><u>Very High</u>: The likelihood of ignition due to damage or failure of conductor damage or failure.</p> <p><u>Medium High</u>: The likelihood of ignition due to other equipment or facility failure.</p> <p><u>Medium</u>: The likelihood of ignition due to secondary damage or failure.</p>	<p><u>All</u>: The likelihood of ignition due to damage or failure of anchor/guy, capacitor bank, connection device, crossarm, fuse, insulator and brushing, lightning arrester, pole damage, recloser, sectionalizer, switch, transformer, voltage regulator, and conductor.</p> <p><u>Medium High</u>: The likelihood of ignition due to other equipment or facility failure.</p> <p><u>All</u>: The likelihood of ignition due to secondary damage or failure.</p>
Vegetation Contact	Events where trees, tree limbs, and other vegetation come in contact with a PG&E asset, resulting in an ignition.	<p><u>High</u>: Reduces the likelihood of ignition risk due to branch not overhanging, branch overhanging, dead vegetation, vegetation falling into, vegetation growing into, and other vegetation contact.</p>	<p><u>Very High</u>: The likelihood of ignition risk due to branch not overhanging, branch overhanging, dead vegetation, vegetation falling into, vegetation growing into, and other vegetation contact.</p>	<p><u>All</u>: The likelihood of ignition risk due to branch not overhanging, branch overhanging, dead vegetation, vegetation falling into, vegetation growing into, and other vegetation contact.</p>

Risk Driver	Description	Covered Conductor with Enhanced Powerline Safety Setting and Downed Conductor Detection	Underground Primary	Underground Primary and Secondary Lines and Services (Underground All)
Contact from Object	Events where objects come into contact with PG&E line equipment and create an ignition. This includes animal/bird contact, mylar balloons, and vehicles.	<u>High</u> : The likelihood of ignition due to animal contact, ballon contact, and vehicle contact. <u>Medium</u> : The likelihood of ignition due to contact from object.	<u>All</u> : The likelihood of ignition due to animal and ballon contact. <u>Very High</u> : The likelihood of an ignition due to vehicle contact. <u>High</u> : The likelihood of ignition due to other contact from object.	<u>All</u> : The likelihood of ignition due to animal contact, ballon contact, and vehicle contact. <u>High</u> : The likelihood of ignition due to other contact from object.
Unable to Determine (Unknown)	Events associated with PG&E assets which led to an ignition, but where PG&E is unable to establish the main driver of the ignition.	<u>High</u> : The likelihood of ignition where PG&E is unable to determine the cause of an ignition.	<u>Very High</u> : The likelihood of an ignition where PG&E is unable to determine the cause of an ignition.	<u>Very High</u> : The likelihood of an ignition where PG&E is unable to determine the cause of an ignition.
Contamination	Events, including ignitions, caused by battery assets and contaminated insulators.	<u>High</u> : The likelihood of ignition due to contamination.	<u>Very High</u> : The likelihood of ignition due to contamination.	<u>All</u> : The likelihood of ignition due to contamination.
Other	Events without known causes.	<u>Medium</u> : The likelihood of ignition due to other causes.	<u>Very High</u> : The likelihood of ignition due to other causes.	<u>Very High</u> : The likelihood of ignition due to other causes.
<del>Wire-to-Wire Contact</del>	<del>Ignitions caused by wire-to-wire contact, commonly known as line slap.</del>	<del><u>Medium</u>: The likelihood of ignition due to wire-to-wire contact.</del>	<del><u>Medium</u>: The likelihood of ignition due to wire-to-wire contact.</del>	<del><u>All</u>: The likelihood of ignition due to wire-to-wire contact/contamination.</del>
Utility Work/ Operation	Activities around utility processes.	<u>None</u> : The likelihood of ignition risk from utility work/operation.	<u>None</u> : The likelihood of ignition risk from utility work/operation.	<u>None</u> : The likelihood of ignition risk from utility work/operation.
Vandalism/ Theft	Vandalism from outside parties.	<u>Medium High</u> : The likelihood of ignition risk due to vandalism or theft.	<u>Very High</u> : The likelihood of ignition risk due to vandalism or theft.	<u>All</u> : The likelihood of ignition risk due to vandalism or theft.

## Attachment 6

**Table 9-6: Vegetation Management QA and QC Activity**

[illegible]