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

PG&E Data Request No.:	OEIS_012-Q002
PG&E File Name:	WMP-Discovery2026-2028_DR_OEIS_012-Q002
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Requester DR No.:	OEIS-P-WMP_2025-PG&E-012
Requesting Party:	Office of Energy Infrastructure Safety
Requester:	Nathan Poon
Date Sent:	[Date] – [Functional Area]

SUBJECT: REGARDING TRANSMISSION RIGHT-OF-WAY MAINTENANCE

QUESTION 002

In its 2026-2028 WMP, Section 9.7.3 "IVM Scheduling," PG&E states that, "For TIVM, previously worked ROWs are reassessed every 2-5 years" (p. 386). In response to data request OEIS-P-WMP_2025-PGE-001, question 16, PG&E stated "[w]ith the availability of LiDAR data, vegetation height and density conditions are analyzed each year."

On page 385, PG&E references Utility Standard: TD-7111S. In section 6 "Annual Planning," the standard states that "work plans are created annually" and reiterates that "ROWS are reassessed every 2 to 5 years."

In the same standard, PG&E states, "Thresholds for implementing TIVM are considered when incompatible vegetation exceeds 3 feet in height or exceeds 50% ground coverage within the managed area."

These various statements seem to contradict each other, with vegetation data assessed and work plans created on an annual basis, but ROWs reassessed every 2 to 5 years.

a. Clarify on what cadence PG&E examines annually collected LiDAR data for vegetation conditions that would trigger TIVM.
b. Clarify on what cadence PG&E performs TIVM. An estimate and/or range is acceptable.
c. Define "previously worked ROWs."
d. Define the following activities and explain the difference between them and how they interact with each other:
    i. Annual analysis of LiDAR data
    ii. Annual work planning
    iii. Reassessment of ROWs every 2 to 5 years

ANSWER 002

a. The LiDAR data is examined annually to support the development of the following year's work plan for Transmission IVM (TIVM).

b. PG&E has an annual Transmission IVM program. TIVM ROW maintenance is dependent on annual resource availability along with how well established the community of compatible vegetation is in a ROW. Considering these two key factors and others cited in the WMP, the TIVM ROW cadence may vary.

c. "Previously worked ROWs" are those where significant program or project specific vegetation maintenance was performed in a ROW to meet NERC FAC-003 requirements or where other ROW clearing/widening occurred typically as part of previous Transmission ROW reclamation or ROW Expansion program efforts. Previously worked ROWs also include those that have had ongoing TIVM maintenance.

d.

i. The annual analysis of LiDAR data is a process tied to annual work planning where LiDAR data is examined to help prioritize which projects may be considered as the most important to schedule the following year.

- Key elements of the LiDAR data examined include vegetation heights and density within spans. The LiDAR data cannot determine whether the vegetation is compatible or incompatible, so other considerations are used such as whether the ROW was previously worked and when, whether it is within/outside of HFTD, is part of some sort of agency agreement, etc.

ii. Annual work planning is a process that includes resource planning, budget allocation, and approval to support execution of various vegetation management programs. It also includes coordination between VM's VASA (Vegetation Asset Strategy and Analytics) team and ETVM (Electric Transmission Vegetation Management) Operations to develop recommended work plans for the following year. For TIVM, the LiDAR analysis and other factors described above help inform the proposed plan, which is then presented to VM leadership for approval.

iii. The reference for reassessing ROWs every 2-5 years was part of a broader WMP question response where PG&E was asked to describe how IVM management activities are scheduled. In hindsight, a better description is: "Scheduling of TIVM maintenance is linked to an annual work planning process where reassessment of previously worked ROWs occurs annually, with follow-up maintenance typically targeted within a 2-5 year period or as resources may allow."

Summary: LiDAR data and the other contributing factors described are examined as part of an annual work plan development process. That effort allows ROW vegetation conditions to be reassessed annually, which helps inform the project recommendations made for VM leadership to review and approve on an annual basis. It would be more accurate to say ROWs are assessed/reassessed annually and depending on resource availability, are typically targeted for maintenance within a 2-to-5-year period. The overall goal of IVM is to establish a compatible plant community that can help extend maintenance cycles as long as possible.