State of California – A Natural Resources Agency
Gavin Newsom, Governor

OFFICE OF ENERGY INFRASTRUCTURE SAFETY
715 P Street, 15th Floor | Sacramento, CA 95814
916.902.6000 | *www.energysafety.ca.gov*
Caroline Thomas Jacobs, Director

June 27, 2025

Sumeet Singh
Executive Vice President, Operations and Chief Operating Officer
Pacific Gas and Electric Company

Subject: The Office of Energy Infrastructure Safety Issuance of Revision Notice for the Pacific Gas and Electric Company 2026-2028 Base Wildfire Mitigation Plan

Mr. Singh:

Enclosed is the Office of Energy Infrastructure Safety's Revision Notice for Pacific Gas and Electric Company's (PG&E)'s 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP). No later than July 28, 2025, PG&E must provide:

- A Revision Notice Response, which includes its responses to the critical issues.
- A clean revised version of its 2026-2028 Base WMP that includes all changes resulting from its Revision Notice Response as well as corrections to errors identified in Section 4 of the Revision Notice.
- A redlined revised version of its 2026-2028 Base WMP that shows all changes from Revision 0 (submitted on April 4, 2025) of PG&E's 2026-2028 Base WMP.

Section 5 of the Revision Notice provides submission instructions. The schedule for PG&E's Revision Notice and Draft Decision is as follows:

PG&E Revision Notice Response Due	July 28, 2025
Opening Comments Due	August 12, 2025
Reply Comments Due	August 22, 2025
Energy Safety Draft Decision Issued No Later Than	October 10, 2025

Sincerely,

Nicole Dunlap
Program Manager, Electrical Safety Policy Division
Office of Energy Infrastructure Safety

OFFICE OF ENERGY INFRASTRUCTURE SAFETY

REVISION NOTICE

PACIFIC GAS AND ELECTRIC COMPANY

2026-2028 BASE WILDFIRE MITIGATION PLAN

June 27, 2025

TABLE OF CONTENTS

1. Introduction

The Office of Energy Infrastructure Safety (Energy Safety) may direct an electrical corporation to modify its Wildfire Mitigation Plan (WMP) by issuing a Revision Notice.[1]

This Revision Notice identifies critical issues in Pacific Gas and Electric Company's (PG&E's) 2026-2028 Base WMP (2026-2028 Base WMP). Critical issues are areas of significant concern that an electrical corporation must address prior to the completion of Energy Safety's evaluation. PG&E must address the critical issues set forth in this Revision Notice according to the parameters provided herein.

This Revision Notice also rejects errata provided in PG&E's May 16, 2025, submission but allows PG&E to incorporate changes from that errata in the Revision Notice Response; and requires PG&E to correct other non-substantive errors in its resubmitted WMP (Section 4).

Section 5 provides submission instructions and deadlines for PG&E's Revision Notice Response.

[1] Pub. Util. Code § 8386.3(a).

2. Summary of Critical Issues

This section outlines issues associated with PG&E's 2026-2028 Base WMP that either by itself or in conjunction with other issues listed amount to critical issues. Energy Safety identified 12 such issues, listed below by mitigation category.

Section 3 provides a more detailed explanation of each concern and provides the required remedies. For the purposes of PG&E's Revision Notice Response and Energy Safety's continued evaluation, each issue is assigned a tracking code.

General

- **RN-PG&E-26-01:** Targets include caveats for future changes.

Risk Assessment and Mitigation Selection

- **RN-PG&E-26-02:** Project prioritization is not properly represented.

Grid Design, Operations, and Maintenance

- **RN-PG&E-26-03:** Decision-making process for system hardening is insufficiently supported.
- **RN-PG&E-26-04:** Combined targets for covered conductor, remote grids, and line removal.
- **RN-PG&E-26-05:** Rebuild program miles are combined into undergrounding and overhead hardening targets.
- **RN-PG&E-26-06:** No target and lack of detail for aerial scan inspections used to supplement detailed distribution inspections.
- **RN-PG&E-26-07:** No target for transmission switch function tests.

Vegetation Management

- **RN-PG&E-26-08:** Vegetation management qualitative targets are not specific or measurable.
- **RN-PG&E-26-09:** No plan for incorporating Tree Removal Inventory (TRI) and Focused Tree Inspections (FTI) into routine patrols.
- **RN-PG&E-26-10:** Pole clearing targets do not follow WMP Guideline requirements.
- **RN-PG&E-26-11:** Integrated Vegetation Management rights-of-way reassessment timescales are unclear.
- **RN-PG&E-26-12:** Vegetation management quality assurance/quality control (QA/QC) units are inconsistent.

3. Critical Issues and Required Remedies

3.1 General

3.1.1 RN-PGE-26-01: Targets include caveats for future changes.

The WMP Guidelines state that targets are "commitments for specific activities" in the WMP.[2] Targets track "completion of the activities in [an electrical corporation's] approved WMP."[3] In its WMP, PG&E includes caveats that some targets will be changed in the future. Changes to an approved WMP are not permissible outside of an Energy Safety decision.

For example, PG&E footnotes its 2028 target for System Hardening – Undergrounding (GH-04): "Depending on when our [Electrical Undergrounding Plan] is approved, our forecast number of underground miles for 2028 may change from the amount shown here."[4] PG&E also footnotes its Pole Clearing Program (VM-02) targets with: "Please note targets will be adjusted as determined by inspections in the previous year and may additionally be impacted by changes to facilities or based on other utility risk mitigation reasons."[5] These types of footnotes undermine PG&E's commitment to implement its plan.

Adjustments to targets in future WMP cycle years should be addressed in the relevant WMP Update, where Energy Safety can evaluate specific and quantitative changes to the targets.

Required Remedies

1. PG&E must remove footnote (c) from Table 8-1: Grid Design, Operation, and Maintenance Targets by Year.
2. PG&E must remove footnote (b) from Table 9-2: Vegetation Inspections and Pole Clearing Targets by Year.

---

[2] WMP Guidelines, page 12.

[3] WMP Guidelines, page 12.

[4] PG&E 2026-2028 Base WMP: Vol 1, page 176.

[5] PG&E 2026-2028 Base WMP: Vol 1, page 356.

3.2 Risk Methodology and Mitigation Strategy

3.2.1 RN-PGE-26-02: Project prioritization is not properly represented.

The WMP Guidelines require a summary of the electrical corporation's "highest-risk circuits, segments, or spans within its service territory"[6] and a summary of risk reduction for top-risk circuits to "provide an integrated view of wildfire risk reduction across the electrical corporation's service territory."[7] PG&E's summaries of highest-risk circuits (presented in Tables 5-5 and 6-4) do not align with the methodology PG&E used to prioritize WMP system hardening projects and, therefore, does not provide an accurate view of the risk reduction for top-risk circuits.

PG&E's summaries in tables 5-5 and 6-4 display circuit segments based on overall risk scores.[8] However, PG&E's methodology for prioritizing hardening projects relies on circuits prioritized based on "risk-per-mile".[9] By using overall risk scores, PG&E's planned system hardening (undergrounding, covered conductor, and line removal) on its top 20 percent riskiest circuits listed in Table 6-4 represents only 49.7 percent of PG&E's total system hardening targets.[10] Of the 90 top 20 percent riskiest circuit segments, 39 (43.3 percent) do not have any hardening planned for 2026 through 2028.[11] For 2027 and 2028, 65.5 percent of PG&E's system hardening targets are in the top 20 percent of riskiest circuits.[12, 13]

If tables 5-5 and 6-4 reflected PG&E's "risk-per-mile" approach, a greater proportion of PG&E's planned system hardening would occur in the presented top-risk circuits. When prioritized based on risk-per-mile, in 2027 and 2028, 79.0 percent of PG&E's system hardening targets are in the top 20 percent riskiest circuits.[14] Therefore, the risk information supplied in Tables 5-5 and 6-4 is not aligned with the way PG&E prioritizes system hardening and does not provide an accurate view of PG&E's wildfire risk reduction across its service territory.

---

[6] WMP Guidelines, page 53.

[7] WMP Guidelines, page 76.

[8] 2026-2028 Base WMP: Vol 1, Table 8-1, page 175.

[9] Response to DR 004 Q04.

[10] Response to DR 004 Q04 Att. 1 compared to 2026-2028 Base WMP: Vol 1, Table 8-1, page 175.

[11] 2026-2028 Base WMP: Vol 2, Table 6-4, pages 783-798.

[12] Response to DR 004 Q04 Att. 1 compared to 2026-2028 Base WMP: Vol 1, Table 8-1, page 175.

[13] System hardening targets for 2026 are based on a previous version of PG&E's risk model and therefore not included in this comparison.

[14] Response to DR 012 Q03 Att. 1 compared to 2026-2028 Baes WMP: Vol 1, Table 8-1, page 175.

Required Remedy

PG&E must revise Tables 5-5 and 6-4 to align with how it prioritizes WMP activities based on risk-per-mile as shown in Attachment 1 of PG&E's response to data request OEIS-P-WMP_2025-PG&E-012, Question 03.

3.3 Grid Design, Operations, and Maintenance

3.3.1 RN-PGE-26-03: Decision-making process for system hardening is insufficiently supported.

The WMP Guidelines require the electrical corporation to discuss "how it is designing its system to reduce overall utility risk and what it is doing to strengthen its distribution, transmission, and substation infrastructure to reduce the risk of utility-related ignitions resulting in catastrophic wildfires."[15] Energy Safety evaluates the WMP for completeness (the comprehensive response to statutory and guideline requirements) and resource use efficiency (a "focus on achieving the greatest risk reduction with the most efficient use of resources").[16] PG&E's discussion of its system hardening raises concerns as to whether it is efficiently using its resources and whether it has explained and substantiated its decision-making.

PG&E's decision-making process for system hardening has multiple steps (cost-benefit ratio comparison and hybrid analysis) that are not well explained. Together, these steps favor undergrounding over other system hardening mitigations. PG&E did not explain how it defined the parameters for these steps nor explain why the steps are not already built into its risk model.

Cost-Benefit Ratio Comparison

When analyzing projects for hardening, PG&E compares undergrounding to overhead hardening, which typically consists of covered conductor (CC) installation in addition to enhanced powerline safety settings (EPSS) (collectively, "CC + EPSS"). PG&E may still choose undergrounding over CC if the undergrounding cost-benefit ratio is within 50 to 100 percent of the CC + EPSS cost-benefit ratio;[17] meaning PG&E may still select undergrounding even if it is half as cost effective as CC + EPSS. In response to a data request from The Utility Reform Network (TURN), PG&E stated that the 50 percent threshold is a discretionary value intended to allow consideration of benefits that are not fully quantified in the cost-benefit ratio.[18] PG&E

[15] WMP Guidelines, page 84.

[16] WMP Guidelines, page 11.

[17] 2026-2028 Base WMP: Vol 1, page 184.

[18] Response to TURN DR 002, question 010.

did not explain how or why the cost-benefit ratio and other risk calculations do not capture these benefits, and did not provide any analytical support for the 50 percent threshold.

Hybrid Analysis

In cases where the 50 percent threshold is not met in the cost-benefit ratio analysis, PG&E's next step is a hybrid analysis to determine whether portions of a circuit segment should be undergrounded. The hybrid analysis uses three criteria: high tree strike potential, ingress/egress concerns, and Public Safety Power Shutoff (PSPS) concerns.[19]

High Tree Strike Potential: PG&E considers a circuit segment to have high tree strike potential if there are six or more trees that could strike the line.[20] In its 2023-2025 Base WMP, PG&E considered 15 trees with strike potential to be "high" potential and 6 to 14 trees with strike potential to be "moderate" potential.[21] In both the 2023-2025 Base WMP and the 2026-2028 Base WMP, a tree strike potential of six results in "undergrounding preferred,"[22, 23] but PG&E provides no explanation on the reasoning and impact of changing its categorization of "high" strike tree potential from 15 down to six.[24]

Additionally, vegetation risks are already considered in PG&E's risk modeling and cost-benefit ratio calculation,[25] but PG&E does not explain why its existing calculations do not adequately capture high tree strike potential.

Ingress/egress concerns: PG&E analyzes ingress and egress concerns using expertise from its Public Safety Specialists (PSS), subject matter experts with wildfire operations experience.[26, 27] PG&E added a new ingress/egress component to its consequence modeling[28] so the risk associated with ingress and egress should already be captured in the cost-benefit ratio analysis. PG&E did not explain why an additional ingress/egress analysis is needed in the hybrid analysis on top of the cost-benefit ratio calculation.

PSPS Concerns: The final criterion for the hybrid analysis is whether the circuit segment has been impacted by PSPS. If the circuit segment has been impacted at all by PSPS, it may be considered for undergrounding.[29] However, outage program risks (including PSPS) are

---

[19] 2026-2028 Base WMP: Vol 1, page 184.
[20] 2026-2028 Base WMP: Vol 1, page 184.
[21] 2023-2025 Base WMP, page 432.
[22] 2023-2025 Base WMP, page 432.
[23] 2026-2028 Base WMP: Vol 1, page 184.
[24] Response to Data Request 008 Q01.
[25] 2026-2028 Base WMP: Vol 1, page 45.
[26] 2026-2028 Base WMP: Vol 1, page 184.
[27] 2026-2028 Base WMP: Vol 1, page 100.
[28] WFC v4 Documentation, page 26.
[29] Response to Data Request 003 Q03.

already included in the cost-benefit ratio calculation. Without additional justification, adding a separate PSPS threshold to the hybrid analysis may be duplicative and account for risks already captured.

Although PG&E listed only a single hybrid undergrounding project as meeting the PSPS criterion,[30] but 51 percent of circuit protection zones [31] in PG&E High Fire Risk Area (HFRA) have been impacted by PSPS.[32] That represents a large share of PG&E's circuits and the use of the PSPS criterion has the potential to improperly prioritize a large number of circuits for undergrounding.

In total, PG&E plans to underground around 221 miles, or 72 percent, of the 2027 target mileage where the cost-benefit ratio of CC + EPSS is better than the cost-benefit ratio for undergrounding.[33] Without justifying the steps to reach that decision, PG&E's WMP does not explain how its system hardening choices meet the resource efficiency evaluation criterion.

Reliability Impacts from Outage Programs

In addition to the lack of justification regarding the cost-benefit ratio comparison and hybrid analysis, neither step considers EPSS in determining whether to underground. In response to a TURN data request, PG&E states that it favors undergrounding even though covered conductor + EPSS is faster to deploy, costs less, and has similar effectiveness because it seeks to "significantly reduce reliability impacts of outage programs and to offer near permanent solutions in the highest risk areas."[34] However, outage programs include both PSPS and EPSS, and PG&E does not include EPSS in any criteria for determining when to underground.

Alternative Mitigations

Lastly, PG&E states that it anticipates analyzing five alternative mitigation scenarios in its Wildfire Benefit Cost Analysis tool.[35] The six total scenarios that PG&E analyzes are: 1) underground primary lines and secondary lines/services, 2) underground primary distribution lines, 3) line removal with remote grid, 4) covered conductor with EPSS and PSPS, 5) covered conductor with EPSS and Downed Conductor Detection (DCD), and 6) covered conductor alone.[36] All six scenarios are based on either undergrounding, covered conductor, or line removal. PG&E did not explain why these were the alternatives selected to be analyzed against or whether additional alternatives were considered.

---

[30] Response to Data Request 003 Q03.

[31] A Circuit Protection Zone (CPZ) is a segment of distribution circuit protected by a specific protection device. PG&E also referrers to CPZs as circuit segments.

[32] Response to Data Request 006 Q01.

[33] Response to Data Request 003 Q03 compared to 2026-2028 Base WMP: Vol 1, Table 8-1, page 175.

[34] Response to TURN DR 002, question 004.

[35] 2026-2028 Base WMP: Vol 1, page 190.

[36] 2026-2028 Base WMP: Vol 1, page 190.

Required Remedies

PG&E must revise its WMP to include:

1. An explanation, including qualitative analytical support, for the 50 percent cost-benefit ratio threshold for selecting undergrounding over CC + EPSS.
2. An explanation for the tree strike potential threshold in the hybrid analysis, including why the categorization for "high" tree strike potential changed, how PG&E's current risk model and the existing cost-benefit ratio analysis does not adequately account for tree strike risks, and a description of the uncertainties in the risk modeling that necessitate an additional analytical step in the system hardening decision-tree.
3. An explanation for the ingress and egress concerns threshold in the hybrid analysis, including how PG&E's current risk model and the existing cost-benefit ratio analysis does not adequately account for ingress and egress risks and a description of the uncertainties in the risk modeling that necessitate an additional analytical step in the system hardening decision-tree.
4. An explanation for the PSPS threshold in the hybrid analysis, including how current risk model and the existing cost-benefit ratio analysis does not adequately account for reliability risks and a description of the uncertainties in the risk modeling that necessitate an additional analytical step in the system hardening decision-tree.
5. An explanation of how EPSS is already factored into the decision-making process, or an explanation of why it is unnecessary to include EPSS into the decision-making process.
6. An explanation of alternative mitigations outside of Table PG&E 8.2.1-3 considered during the cost-benefit ratio analysis of PG&E's decision-making process.

3.3.2 RN-PGE-26-04: Combined targets for covered conductor, remote grids, and line removal.

The WMP Guidelines require the electrical corporation's quantitative grid design, operations, and maintenance targets to "provide enough detail to effectively inform efforts to improve the performance of the electrical corporation's grid design, operations, and maintenance initiatives," and require the targets associated with the activity to be "distinct, [. . .] even if the electrical corporation tracks targets internally with activities combined."[37] PG&E's Overhead Hardening and Line Removal – Distribution (GH-12) target does not meet these requirements.

[37] WMP Guidelines, page 81.

PG&E discusses each grid design and system hardening activity required in Section 8.2 of the WMP Guidelines,[38] including covered conductor installation, microgrids, and line removal.[39] However, PG&E uses a single tracking ID (GH-12) for covered conductor installation, remote grid (as subsection of microgrids) and distribution line removal (as subsection of line removal).[40] PG&E refers to activity GH-12 as "Overhead Hardening and Line Removal – Distribution" and sets a target of 318 miles and 1.8 percent risk reduction for 2026, 200 miles and 1.5 percent risk reduction in 2027, and 200 miles and 1.1 percent risk reduction in 2028.[41] This target represents aggregated work to be completed for the three different activities and does not follow the WMP Guidelines requirements for targets to be associated with distinct activities.

Elsewhere in the WMP, PG&E describes the impact on risk reduction of covered conductor, remote grid, and line removal differently,[42] acknowledging that the three activities are not interchangeable and have different expected risk reduction. Therefore, combining the activities into a single target obscures commitments and the associated risk reduction of each individual activity.

Additionally, the combined target creates ambiguity around the line removal and remote grid activities. PG&E states the target "includes work associated with overhead distribution hardening (CC installation) and line removal with remote grid."[43] In the line removal section, PG&E states that a distribution line may be considered for removal due to: 1) idle facilities, 2) circuit re-route, or 3) remote grid installation.[44] With the combined target, it is unclear how the remote grid target is tracked in "miles" and if only the line removal associated remote grid counts toward the target.

Required Remedy

PG&E must set separate targets for covered conductor installation remote grid installations, and distribution line removal. Each activity and associated target must have its own unique activity tracking ID.

---

[38] WMP Guidelines, page 84.

[39] 2026-2028 Base WMP: Vol 1, pages 180-197, 207-215, and 216-217.

[40] 2026-2028 Base WMP: Vol 1, pages 180, 207, and 216.

[41] 2026-2028 Base WMP: Vol 1, page 175.

[42] 2026-2028 Base WMP: Vol 1, pages 186-196, 206, and 216.

[43] 2026-2028 Base WMP, Vol 1, page 197.

[44] 2026-2028 Base WMP: Vol 1, page 216.

3.3.3 RN-PGE-26-05: Rebuild program miles are combined into undergrounding and overhead hardening targets.

The WMP Guidelines state that targets are used to "track the electrical corporation's completion of the activities in its approved WMP,"[45] and that the targets "must provide enough detail to effectively inform efforts to improve the performance of the electrical corporation's grid design, operations, and maintenance initiatives."[46] By combining rebuild program miles into its undergrounding and overhead hardening targets, PG&E's WMP fails to facilitate the effective tracking of activities and inform efforts to improve performance.

PG&E defines "fire rebuild" work as work done in "areas that have been impacted directly by wildfire within a HFTD" that consists of rebuilding "damaged assets that require hardening (i.e., overhead or underground)" and "community rebuild" work as "work in areas impacted by wildfires outside of an HFTD area."[47] PG&E includes fire rebuild work into its overhead hardening target, Overhead Hardening and Line Removal – Distribution (GH-12).[48] PG&E includes fire rebuild and community rebuild work into its undergrounding target, System Hardening – Undergrounding (GH-04).[49]

The circumstances for planning and building infrastructure prioritized through a risk-based decision-making process versus rebuilding infrastructure after a wildfire are different. Combining rebuild miles into hardening targets obscures PG&E's plans and commitments for its mitigation activities.

Secondly, rebuild miles are tracked separately from other WMP activities at the California Public Utilities Commission (CPUC).[50] Removing rebuild miles from hardening targets will increase the accuracy of tracking for both Energy Safety and the CPUC.

Required Remedy

PG&E must revise its undergrounding (GH-04) and overhead hardening (GH-12) targets to exclude fire rebuild and community rebuild miles. Any new targets created as a result of this Revision Notice must exclude fire rebuild and community rebuild miles.

---

[45] WMP Guidelines, page 12.

[46] WMP Guidelines, page 81.

[47] 2026-2028 Base WMP: vol 1, page 186.

[48] PG&E 2026-2028 Base WMP: Vol 1, page 197 and response to DR 002 Q03.

[49] 2026-2028 Base WMP: Vol 1, page 197 and response to DR 002 Q03.

[50] D.23-11-096, Ordering Paragraph 38, page 910.

3.3.4 RN-PGE-26-06: No target and lack of detail for aerial scan inspections used to supplement detailed distribution inspections.

The WMP Guidelines require targets which "support the reduction of utility-related ignitions and outages, and reflect an increase in maturity of the electrical corporation's wildfire mitigation capabilities."[51] PG&E's WMP includes a lower target for detailed distribution inspections compared to previous years. PG&E offsets the lower detailed distribution target with the addition of aerial scan inspections; however, PG&E does not set a target for aerial scan inspections.

PG&E's 2026-2028 annual target for detailed distribution inspections is lower than targets in previous plans.[52] PG&E supports the reduced detailed inspection targets by supplementing the detailed inspections with aerial scan inspections in the highest consequence and highest risk areas.[53, 54] Aerial scan is a new inspection type completed by drone, distinct from aerial detailed inspections, and consists of a "review of a streamlined set of photos."[55, 56]

PG&E claims that aerial scan inspections are efficient. PG&E analyzed its proposal for 218,395 detailed inspections supplemented with 37,042 aerial scan inspections against the five scenarios required in area for continued improvement PG&E-25U-04.[57] PG&E-25U-04 required PG&E to compare the cost-benefit ratios of its 2023-2025 inspection frequency against four other scenarios.[58] In the analysis, PG&E concluded that the scenario that uses aerial scan inspections achieves 57 percent eyes-on-risk and has a better cost benefit ratio than the five scenarios.[59]

PG&E's decision to reduce detailed inspection targets hinges on using aerial scans but the WMP does not include a target for aerial scan inspections. PG&E states that it is piloting aerial scans in 2025, with planned implementation in 2026;[60] and therefore, no targets for the program are set in the WMP.[61] If PG&E is planning implementation in 2026, then it must

---

[51] WMP Guidelines, page 12.

[52] 2026-2028 Base WMP: Vol 1, page 226 compared to 2023-2025 Base WMP, page 387 and 2022 WMP Update, page 616.

[53] 2026-2028 Base WMP: Vol 1, page 240.

[54] 2026-2028 Base WMP: Vol 1, page 570.

[55] Response to DR 001 Q21.

[56] 2026-2028 Base WMP: Vol 1, pages 236-237.

[57] 2026-2028 Base WMP: Vol 1, page 571.

[58] Decision for PG&E 2025 WMP Update, pages 62-63.

[59] 2026-2028 Base WMP: Vol 1, page 571.

[60] Response to DR 001 Q21.

[61] 2026-2028 Base WMP: Vol 1, page 240.

provide targets to ensure commitment to that implementation. The lack of quantitative commitment to perform aerial scans undermines the basis for the decreased detailed distribution inspection target. Without a measurable commitment to aerial scan inspections, PG&E's detailed inspection plan for 2026-2028 will achieve less eyes-on-risk than its previous plan.

Required Remedy

PG&E must set targets for aerial scan inspections for 2026, 2027, and 2028, in accordance with the requirements for targets set forth for Table 8-2 in Section 8.3 of the WMP Guidelines. For any year PG&E does not set an aerial scan inspection target, it must increase its distribution detailed inspection targets to independently achieve the 57 percent eyes-on-risk PG&E plans to achieve with aerial scan inspection supplementation.

3.3.5 RN-PGE-26-07: No target for transmission switch function tests.

The WMP Guidelines require targets which "support the reduction of utility-related ignitions and outages, and reflect an increase in maturity of the electrical corporation's wildfire mitigation capabilities."[62] PG&E's WMP lacks targets for transmission switch function tests, an important inspection type to reduce utility-related ignitions and outages.

Transmission switch function tests have the highest level 1 condition find rate of all inspection types described in Table PG&E-8.3-1.[63] Transmission switches have the second highest failure rate and highest ignition rate of all equipment types described in Table PG&E-8.4-1.[64] Seemingly recognizing the importance of these tests, PG&E performed 21 transmission switch function tests in the HFTD/HFRA in 2022, 90 in 2023, and 206 in 2024, and claims "[t]he process of scheduling and executing these inspections has been steadily improving."[65] However, PG&E did not set a target for performing these tests in 2026, 2027, or 2028.

Required Remedy

PG&E must set targets for transmission switch function tests for 2026, 2027, and 2028, in accordance with the requirements set forth for Table 8-2 in Section 8.3 of the WMP Guidelines.

---

[62] WMP Guidelines, page 12.

[63] 2023-2025 Base WMP: Vol 1, page 227.

[64] 2023-2025 Base WMP: Vol 1, page 258.

[65] Response to DR 002 Q07.

3.4 Vegetation Management and Inspections

3.4.1 RN-PGE-26-08: Vegetation management qualitative targets are not specific or measurable.

The WMP Guidelines state that targets are used to "track the electrical corporation's completion of the activities in its approved WMP."[66] The WMP Guidelines additionally define qualitative targets as "specific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program."[67] PG&E's vegetation management qualitative targets, described below, are not specific or measurable.

PG&E describes its Wood Management Benchmarking (VM-23) and Integrated Vegetation Management Benchmarking (VM-25) targets as developing peer utility Integrated Vegetation Management and wood management benchmarking studies to identify best practices.[68]

PG&E describes its Workforce Planning – Vegetation Management (VM-24) target as "PG&E will continue to report annually on [its] execution of planned recruitment, retention, and training of vegetation management and inspections personnel and partnerships."[69]

PG&E describes its Enterprise System – Vegetation Management (ES-01) target as "this effort improves VM data through proactive identification of data quality issues and the development and execution of data quality mitigation plans."[70]

In the annual "target/status" column of the table for each of these four quantitative targets, PG&E only uses vague descriptions of "started," "in progress," and "completed" to track progress.[71] In response to a data request, PG&E provided a more detailed timeline for its Wood Management Benchmarking activity.[72] However, the information and commitments in the WMP are minimal and are neither specific nor measurable.

Required Remedy

PG&E must revise its vegetation management qualitative targets for VM-23, VM-24, VM-25, and ES-01 to be specific and measurable. PG&E must include milestones that define specific

---

[66] WMP Guidelines, page 12.

[67] WMP Guidelines, page A-15.

[68] 2026-2028 Base WMP: Vol 1, page 354.

[69] 2026-2028 Base WMP: Vol 1, page 354.

[70] 2026-2028 Base WMP: Vol 1, page 535.

[71] 2026-2028 Base WMP: Vol 1, pages 354 and 538.

[72] Response to DR 001 Q15.

actions PG&E will take to achieve the targets and demonstrate progress year-over-year toward target completion.

3.4.2 RN-PGE-26-09: No plan for incorporating TRI and FTI into routine patrols.

Energy Safety evaluates the WMP for technical and programmatic feasibility and effectiveness.[73] PG&E states its intent to consolidate components of Tree Removal Inventory (TRI) and Focused Tree Inspection (FTI) programs into its Distribution Routine Patrol Program. PG&E does not provide any details on which components of these critical programs will continue after consolidation. The lack of specificity greatly hinders Energy Safety's ability to evaluate the feasibility and effectiveness of PG&E's Distribution Routine Patrol program.

Energy Safety also evaluates the WMP for continued progress.[74] PG&E has not demonstrated progress required in areas for continued improvement PG&E-23B-17 and PG&E-23B-15. PG&E does not provide a plan to consolidate its vegetation inspection programs for distribution circuits as required by PG&E-23B-17,[75] and also does not provide a plan for consistent HFTD-wide hazard tree-related risk reduction as required by PG&E-23B-15.[76]

Secondly, the WMP Guidelines state that targets are used to "track the electrical corporation's completion of the activities in its approved WMP."[77] However, PG&E did not set a target to track its progress on mitigating trees in the TRI.

Consolidation of TRI and FTI

In its 2023-2025 WMP, PG&E implemented Vegetation Management Operational Mitigation (VMOM), TRI, and FTI to replace aspects of its discontinued Enhanced Vegetation Management (EVM) program.[78] PG&E's 2023-2025 Distribution Vegetation Management Inspection program included Routine Patrol, Second Patrol, VMOM, TRI, and FTI.[79]

PG&E described TRI as "[working] down trees previously identified [by EVM]" and "[mitigating] the highest risk-ranked circuit segments or CPZ first."[80] PG&E described FTI as

[73] WMP Guidelines, page 11.

[74] WMP Guidelines, page 12.

[75] Decision for PG&E 2023-2025 Base WMP, pages 110.

[76] Decision for PG&E 2023-2025 Base WMP, pages 108-109.

[77] WMP Guidelines, page 12.

[78] 2023-2025 Base WMP, pages 678 and 680-681.

[79] 2023-2025 Base WMP, pages 630-631.

[80] 2023-2025 Base WMP, page 680.

"[addressing] high risk areas that have experienced higher volumes of vegetation damage during PSPS events, outages, and/or ignitions."[81]

In the 2023-2025 Base WMP Decision, Energy Safety required PG&E to present a plan to consolidate its distribution vegetation management inspection programs with an objective to reduce the number of touchpoints caused by overlapping scopes of work.[82] In response to PG&E-23B-17, PG&E states its intention to consolidate TRI and FTI into Distribution Routine Patrol and that it is "in the process of evaluating which components will be incorporated."[83] In a data request response, PG&E confirmed it has not decided which components of the TRI and FTI programs will continue nor has it determined the criteria for evaluating the programs.[84] PG&E also collects data differently under TRI, FTI, and Distribution Routine Patrol and PG&E's plan PG&E references in its WMP does not include any details on how the data fields will be consolidated.[85]

PG&E's lack of detail on the consolidation of TRI and FTI into Distribution Routine Patrol raises concerns about the feasibility, effectiveness, and continued progress of its plan.

Mitigating Trees in TRI

Furthermore, PG&E "estimates there will be approximately 291,792 trees still to be reviewed in the TRI as of January 1, 2026," and "expects to mitigate all the trees listed in the TRI by 2030."[86] In its 2023-2025 WMP, PG&E provided annual targets to mitigate trees in the TRI,[87] but does not provide targets for reducing the inventory in the 2026-2028 Base WMP.

Tracking PG&E's progress to mitigate all trees in the TRI requires PG&E to set targets that progressively reduces the number of trees in the inventory. Trees inventoried under TRI must be mitigated regardless of the program the inventory ultimately falls under.

Required Remedies

PG&E must revise its WMP to include a plan to evaluate which components of TRI and FTI it will incorporate into the Distribution Routine Patrol Program and ensure a transition that continues to effectively mitigate vegetation risk during the consolidation. The plan must include:

---

[81] 2023-2025 Base WMP, page 681.

[82] Decision for PG&E 2023-2025 Base WMP, page 110.

[83] 2026-2028 Base WMP: Vol 1, page 363.

[84] Response to DR 001 Q09.

[85] Response to DR 013 Q01.

[86] Response to DR 003 Q01.

[87] 2023-2025 Base WMP, page 615.

1. A process and criteria for determining which components of TRI and FTI it will incorporate into the Distribution Routine Patrol Program. The process must identify how it preserves the original purpose of TRI and FTI, including:
    a. For TRI: "[W]ork down tree previously identified [by EVM]" and "mitigate the highest risk-ranked circuit segments or CPZs first" (PG&E 2023-2025 Base WMP R8, page 680).
    b. For FTI: "[A]ddress high risk areas that have experienced higher volumes of vegetation damage during PSPS events, outages, and/or ignitions" (PG&E 2023-2025 Base WMP R8, page 681).
2. A process and criteria for determining which TRI and FTI unique data fields it will incorporate into the Distribution Routine Patrol Program that ensures PG&E can track prescriptions for and mitigation of individual trees.
3. A timeline, including measurable and auditable milestones, for the program consolidation. The timeline and milestones must be included in Table 9-1 as a qualitative target.
    a. The timeline must include a date by which PG&E will operationalize its new Distribution Routine Patrol Program procedures that includes any continuing TRI and FTI components and integration of unique TRI and FTI data fields.
    b. If the operationalization date does not result in the new Distribution Routine Patrol Program procedures applying to 80 percent or more of PG&E's targeted distribution routine patrols in the HFTD in 2026, PG&E must include TRI and FTI as activities in Section 9.2 (Vegetation Management Inspections) of its WMP and describe the planned actions under TRI and FTI for the period before the new Distribution Routine Patrol Program procedures are in place.
4. Regardless of the status of the consolidation of TRI and FTI into Distribution Routine Patrol, PG&E must set quantitative targets for mitigating trees in the TRI (and successor program) for 2026, 2027, and 2028. The targets must have units consistent with the target set for VM-04 in PG&E's 2023-2025 Base WMP.

3.4.3 RN-PGE-26-10: Pole clearing targets do not follow WMP Guideline requirements.

The WMP Guidelines state: "Pole clearing performed in compliance with Public Resources Code (PRC) section 4292 must have a quantitative target. The electrical corporation may define additional pole clearing targets (e.g., pole clearing performed in the Local

Responsibility Area)."[88] PG&E's pole clearing target (VM-02) does not follow this requirement because it consolidates pole clearing in compliance into a single target.

In Section 9.4 of its 2026-2028 Base WMP, PG&E describes both pole clearing performed in compliance with PRC section 4292 and pole clearing performed outside the requirements of PRC section 4292.[89] PG&E assigns VM-02 as the tracking ID for pole clearing and sets a single target for pole clearing. In a data request response, PG&E confirmed that its pole clearing target includes poles required to be cleared under PRC 4292 and poles not required to be cleared under PRC 4292.[90]

Required Remedy

PG&E must set two separate pole clearing targets for each year for the years 2026, 2027, and 2028. There must be one target for work performed in compliance with PRC section 4292, and another for work outside of PRC section 4292.

3.4.4 RN-PGE-26-11: Integrated Vegetation Management rights-of-way reassessment timescales are unclear.

The WMP Guidelines require an overview of activities performed in accordance with Integrated Vegetation Management (IVM) principles, including how the activities are scheduled.[91] PG&E's description of how it schedules its IVM work is unclear and impacts Energy Safety's ability to evaluate PG&E's IVM activities.

PG&E states in its 2026-2028 Base WMP that for Transmission Integrated Vegetation Management (TIVM), "previously worked [rights-of-way] are reassessed every 2-5 years."[92] In the WMP, PG&E also references Utility Standard: TD-7111S. This standard states that "work plans are created annually" and reiterates that rights-of-way are reassessed every two to five years.[93] 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."[94] In a data request response, PG&E stated "with the availability of LiDAR data, vegetation height and density conditions are analyzed each year."[95]

The various descriptions on the timing of TIVM seem to contradict, with vegetation data assessed annually and work plans created annually, but rights-of-way reassessed every two

---

[88] WMP Guidelines, page 104.

[89] PG&E 2026-2028 Base WMP: Vol 1, page 378.

[90] Response to DR 002 Q10.

[91] WMP Guidelines, page 112.

[92] 2026-2028 Base WMP: Vol 1, page 386.

[93] TD-7111S, page 5.

[94] TD-7111S, page 5.

[95] Response to DR 001 Q16.

to five years. In a follow-up data request response, PG&E clarified that "it would be more accurate to say [rights-of-way] are assessed/reassessed annually and depending on resource availability, are typically targeted for maintenance within a 2-to-5-year period."[96]

In the WMP, PG&E additionally states that the reassessments occur on "previously worked [rights-of-way]."[97] PG&E's IVM activities includes vegetation control through manual, mechanical, and chemical methods, a tree replacement program, and community education.[98] With such a wide breadth of activities and methods, it is not clear what qualifies as a "previously worked" right-of-way. In a data request response, PG&E clarified the definition of a "previously worked right-of-way."[99]

As presented in the WMP, further clarity in PG&E's description of its IVM program is required to facilitate Energy Safety's evaluation.

Required Remedies

PG&E must revise the Integrated Vegetation Management Section of its WMP (Section 9.7) to:

1. Clearly state the cadence for rights-of-way assessment/reassessment, targeted cadence for maintenance work, and cadence for work in support of developing Integrated Vegetation Management workplans (e.g., LiDAR data analysis).
2. Include a definition for "previously worked rights-of-way" if PG&E uses the term to describe the assessment/reassessment cadence.

3.4.5 RN-PGE-26-12: Vegetation management QA/QC units are inconsistent.

The WMP Guidelines require each electrical corporation to "describe how it determines the sample for each QA and QC program [. . .] and how [it] ensures samples are representative of the population."[100] The units PG&E uses for its vegetation management quality assurance (QA) and quality control (QC) sample sizes is inconsistent and PG&E fails to describe how the units are interrelated.

For Vegetation Management Quality Assurance – Distribution Routine (VM-08D) and Vegetation Management Quality Assurance – Transmission Routine (VM-08T), PG&E defines

[96] Response to DR 012 Q02.

[97] 2026-2028 Base WMP: Vol 1, page 386.

[98] 2026-2028 Base WMP: Vol 1, page 384.

[99] Response to DR 012 Q02, subpart c.

[100] WMP Guidelines, page 120.

"inspections" as the population/sample unit; however, the population size and sample size columns are filled with numeric values followed by "miles."[101]

Similarly, for Vegetation Management Quality Control – Distribution Routine (VM-22D), PG&E defines "inspections" as the population/sample unit; but the population size and sample size columns are filled with numeric values followed by "span."[102]

Lastly, for Vegetation Management Quality Control – Transmission Routine (VM-22T), PG&E again defines "inspections" as the population/sample unit, but uses "miles" in the population size columns and "spans" in the sample size columns.[103]

PG&E provided greater detail into its QA/QC processes in responses to data requests, but did not clearly define a single, consistent, population/sample size unit for each activity.[104]

The inconsistent use of inspections, miles, and spans, to describe PG&E's vegetation management QA/QC activities leaves the intended population/sample size unit unclear. PG&E does not explain how inspections, miles, and spans relate and therefore fails to describe how it determines the sample size of its vegetation management QA/QC activities.

Required Remedy

PG&E must revise Table 9-6 to have consistent units across each individual QA and QC activity or an explanation, in Section 9.11.3, of why different units are used and the methodology for converting between units. For example, if the population/sample unit is "inspection," but the population and sample size is "miles," PG&E must explain how it uses inspections to audit miles.

[101] 2026-2028 Base WMP: Vol 1, page 410.

[102] 2026-2028 Base WMP: Vol 1, page 410.

[103] 2026-2028 Base WMP: Vol 1, page 410.

[104] Response to DR 001 Q01, Response to DR 005 Q04, and Response to DR 010 Q01.

4. Substantive and Non-Substantive Errata

PG&E timely submitted substantive errata to its 2026-2028 Base WMP on April 18, 2025, its substantive errata deadline.[105] PG&E must include these changes in its revised 2026-2028 Base WMP.

On May 16, 2025, PG&E submitted a document titled, "2025-05-16 PGE 2026-2028 Base WMP Non-substantive Errata."[106] Energy Safety hereby rejects the submission because the document contains both substantive and non-substantive changes.

Electrical corporations may not submit substantive changes as non-substantive changes. In the interest of evaluating a complete and accurate WMP, PG&E may revise its 2026-2028 Base WMP to reflect changes described in its rejected May 16, 2025, errata, including both substantive and non-substantive changes. These changes must be listed in a cover letter or attachment to PG&E's Revision Notice Response submission and follow the errata requirements set forth in Section 7 of the Electrical Safety Policy Division Process Guidelines.[107]

Energy Safety additionally identified non-substantive errors for PG&E to correct in its revised 2026-2028 Base WMP. PG&E must revise its 2026-2028 Base WMP to correct the errors identified in Table 1 below.

Table 1. Errors in the PG&E 2026-2028 Base WMP.

Section	Page (s)	Correction or Clarification
9.6	382-383	Section 9.7.4 is misplaced under Section 9.6. **PG&E must move Section 9.7.4 to Section 9.7.**
9.13	418-421	Table 9-9 is missing rows for tree crew workers. Response to Energy Safety's Data Request 010, Question 2 includes the correct information.[108] **PG&E must add rows for tree crew workers to Table 9-9.**

[105] Errata to 2026-2028 Base WMP, April 18, 2025.

[106] Errata to 2026-2028 Base WMP, May 16, 2025.

[107] ESPD Process Guidelines, page s 8-9.

[108] Response to DR 010 Q02.

5. Conclusion and Next Steps

PG&E must submit its Revision Notice Response along with a clean revised 2026-2028 Base WMP and a redlined revised 2026-2028 Base WMP to the 2026-2028 Wildfire Mitigation Plan docket (#2026-2028-Base-WMPs).

PG&E must respond to and fully address each of the remedies in its Revision Notice Response.[109] PG&E must also correct the non-substantive errors identified in Section 4. PG&E may incorporate the errata provided in its May 16, 2025, submission.

Stakeholders and members of the public may submit opening and reply comments on PG&E's Revision Notice Response in accordance with Section 4 of the Energy Safety Policy Division Process Guidelines,[110] pursuant to the schedule below. Opening and reply comments must be submitted to the 2026-2028 Wildfire Mitigation Plan docket (#2026-2028-Base-WMPs). Reply comments must be limited to issues raised and representations made in the opening comments.

The schedule for PG&E's Revision Notice Response and Draft Decision is as follows:

PG&E Revision Notice Response and Revised WMP Due	July 28, 2025
Opening Comments Due	August 12, 2025
Reply Comments Due	August 22, 2025
Energy Safety Draft Decision Issued No Later Than	October 10, 2025

[109] WMP Guidelines, pages 9-10.

[110] Policy Division Process Guidelines, pages 2-4.

DATA DRIVEN
FORWARD-THINKING
INNOVATIVE
SAFETY FOCUSED

OFFICE OF ENERGY INFRASTRUCTURE SAFETY
A California Natural Resources Agency
www.energysafety.ca.gov

715 P Street, 15th Floor
Sacramento, CA 95814
916.902.6000

Appendix A: References Table

Citation	Reference
2022 WMP Update.	Pacific Gas and Electric Company, 2022 Wildfire Mitigation Plan Update R1, published July 26, 2022, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52782&shareable=true)
2023-2025 Base WMP.	Pacific Gas and Electric Company, 2023-2025 Base Wildfire Mitigation Plan R8, published February 13, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57976&shareable=true)
2025 WMP Update.	Pacific Gas and Electric Company, 2025 Wildfire Mitigation Plan Update R1, published July 5, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56962&shareable=true)
2026-2028 Base WMP: Vol 1.	Pacific Gas and Electric Company, 2026-2028 Base Wildfire Mitigation Plan R0: Volume 1, published April 4, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58219&shareable=true).
2026-2028 Base WMP: Vol 2.	Pacific Gas and Electric Company, 2026-2028 Base Wildfire Mitigation Plan R0: Volume 2, published April 4, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58220&shareable=true)
D.23-11-069.	California Public Utilities Commission, Decision on Test Year 2023 General Rate Case for Pacific Gas and Electric Company, issued November 17, 2023, URL: (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M520/K896/520896345.pdf)
Decision for PG&E 2023-2025 Base WMP.	Office of Energy Infrastructure Safety, Decision on Pacific Gas and Electric Company's 2023-2025 Base Wildfire Mitigation Plan, published December 29, 2023, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56134&shareable=trueDecision)
Decision for PG&E 2025 WMP Update.	Office of Energy Infrastructure Safety, Decision for Pacific Gas and Electric Company's 2025 Wildfire Mitigation Plan Update, published November 19, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57629&shareable=true)
Errata to 2026-2028 Base WMP, April 18, 2025.	Pacific Gas and Electric Company, 2026-2028 Wildfire Mitigation Plan Substantive Errata, published April 18, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58296&shareable=true)
Errata to 2026-2028 Base WMP, May 16, 2025.	Pacific Gas and Electric Company, 2026-2028 Wildfire Mitigation Plan Non-Substantive Errata, published May 16, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58478&shareable=true)
ESPD Process Guidelines.	Office of Energy Infrastructure Safety, Energy Safety Policy Division Process Guidelines, published February 24, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58025&shareable=true)
Policy Division Process Guidelines.	Office of Energy Infrastructure Safety, Policy Division Process Guidelines, published February 24, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58025&shareable=true).

Citation	Reference
Pub. Util. Code § 8386.	Public Utilities Code section 8386, effective January 1, 2022, URL: (https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC&sectionNum=8386.3.)
Pub. Util. Code § 8386.3.	Public Utilities Code section 8386.3, effective January 1, 2022, URL: (https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC&sectionNum=8386.3.).
Response to DR 001 Q01.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-001 Question 01, published April 11, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58239&shareable=true)
Response to DR 001 Q09.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-001 Question 09, published April 11, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58246&shareable=true)
Response to DR 001 Q15.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-001 Question 15, published April 11, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58253&shareable=true)
Response to DR 001 Q16	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-001 Question 16, published April 11, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58254&shareable=true)
Response to DR 001 Q21.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-001 Question 21, published April 11, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58259&shareable=true)
Response to DR 002 Q07.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-002 Question 07, published, April 16, 2026, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58279&shareable=true)
Response to DR 002 Q10.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-002 Question 10, published April 16, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58282&shareable=true)
Response to DR 003 Q01.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-003 Question 01, published April 23, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58319&shareable=true)
Response to DR 003 Q03.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-003 Question 03, published April 23, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58321&shareable=true)
Response to DR 004 Q04 Att. 1.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-004 Question 04 Attachment 1, published April 30, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58364&shareable=true)
Response to DR 005 Q04.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-005 Question 04, published April 25, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58349&shareable=true)

Citation	Reference
Response to DR 006 Q01.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-006 Question 01, published April 30, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58370&shareable=true)
Response to DR 008 Q01.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-008 Question 01, published May 7, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58421&shareable=true)
Response to DR 010 Q01.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-010 Question 01, published May 16, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58504&shareable=true)
Response to DR 010 Q02.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-010 Question 02, published May 16, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58505&shareable=true)
Response to DR 012 Q02.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-012 Question 02, published May 29, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58572&shareable=true)
Response to DR 012 Q03 Att. 1.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-012 Question 3 Attachment 1, published June 5, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58603&shareable=true)
Response to DR 013 Q 01.	Pacific Gas and Electric Company, Response to Data Request OEIS-P-WMP_2025-PG&E-013 Question 01, published June 6, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58657&shareable=true
Response to MGRA DR 006.	Pacific Gas and Electric Company, Response to Mussey Grade Road Alliance Data Request 006, published May 8, 2025, URL: (https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/2026-2028-MGRA_006.zip)
Response to TURN DR 002.	Pacific Gas and Electric Company, Response to The Utility Reform Network Data Request 002, published April 10, 2025, URL: (https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/2026-2028-TURN_002.zip)
TD-7111S.	Pacific Gas and Electric Company, Utility Standard TD-7111S (revision 1), published February 20, 2024, URL: (https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/td-7111s-vegetation-management-transmission-right-of-way-maintenance-and-row-expansion-programs.pdf)
WCF v4 Documentation.	Pacific Gas and Electric Company, Wildfire Consequence Model Version 4 Documentation, revised March 12, 2025, URL: (https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/wildfire-consequence-model-documentation-v4.pdf)
WMP Guidelines.	Office of Energy Infrastructure Safety, Wildfire Mitigation Plan Guidelines, published February 24, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true).