Pacific Gas and Electric Company

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July 28, 2025 **BY ELECTRONIC COMMUNICATION**

Tony Marino, Deputy Director
Office of Energy Infrastructure Safety (Energy Safety)
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: PG&E's 2026-2028 Wildfire Mitigation Plan – Final Revision Notice Response
Docket: #2026-2028-Base-WMPs

Dear Deputy Director Marino:

In compliance with the Office of Energy Infrastructure Safety's (Energy Safety) Revision Notice for Pacific Gas and Electric Company's 2026-2028 Wildfire Mitigation Plan (WMP), we provide the following:

- A Revision Notice response, which includes responses to all twelve Critical Issues identified by Energy Safety;
- A redlined version of our 2026-2028 Base WMP that includes changes resulting from the Revision Notice response;
- A clean version of our 2026-2028 Base WMP that includes changes resulting from the Revision Notice response;
- A revised Excel file updating tables required in the 2026-2028 WMP that incorporates all required changes across all Critical Issues; and
- A revised version of PG&E's Annual-WMP Tabular Wildfire Mitigation Data incorporating the changes from the Revision Notice response.

Furthermore, pursuant to Section 4 of the Revision Notice, we updated the 2026-2028 Base WMP to incorporate the changes described in the previously filed substantive and non-substantive errata. Additionally, we corrected the errors identified in Table 1 ("Errors in the PG&E 2026-2028 Base WMP").[1] Please note that some of the changes previously identified in the errata were made unnecessary by updates made in response to the Revision Notice. Consistent with Energy Safety's direction, we are submitting these items to the 2026 Wildfire Mitigation Plans docket #2026-2028-Base-WMPs.

[1] Energy Safety's issuance of Revision Notice (June 27, 2025) at 21.

Please also note that, in response to Critical Issue RN-PGE-26-01, we removed footnote (c) from Table 8-1 of the 2026-2028 WMP R0. The removed footnote stated that the 2028 underground mileage target could change depending on the timing of the Electrical Undergrounding Plan (EUP) that we intend to file in late 2025. We included this footnote with our initial submission to emphasize the interdependence of system-hardening-related proceedings, not to suggest that we would change a system-hardening target without approval from Energy Safety.

We understand—and have always intended to comply with—Energy Safety's requirement that any target changes should be managed through the annual update or the Petition to Amend process. However, because the timing of the annual updates is fixed, and the possible timing of EUP-related decisions is uncertain—as noted in our comments on the Revised Draft 2026-2028 WMP Guidelines, we urge Energy Safety to explicitly allow a utility to submit a petition to amend in response to an EUP-proceeding decision, not only in response to a GRC decision, as is currently stated in the WMP Guidelines.[2]

We appreciate Energy Safety's careful review of our 2026-2028 WMP. Please let us know if you need any additional materials or clarifications.

Sincerely

_____/S/_____

Jay Leyno

Director, Wildfire Mitigation PMO

[2] PG&E Comments on Energy Safety's Revised Draft 2026-2028 WMP Guidelines (Feb. 6, 2025) at 1-2.

Attachment 1

Table of Substantive and Non-Substantive Changes

	Substantive / Non-Substantive	Location of Issue (Section, Page #)	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 ~~closure~~ CLOSURE VOLUME
2	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)."
3	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.
4	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
5	Narrative update to remove description of historical data that is no longer accounted for regarding Potentially Impacted Customers (PIC)	Section 5.2.1 Risk and Risk Component Identification, P. 57	~~Starting in January 2023, PG&E incorporated additional customers who could be impacted into the PSPS consequence model and classified them as Potentially-Impacted Customers (PIC). PG&E incorporated this data because not every customer who could experience a PSPS event is captured in the historical backcast. This enables the calculation of roughly double the potentially-affected customers and impacts circuit-based risk prioritization during PSPS events.~~
6	Narrative update to accurately describe risk calculation procedure	Section 5.2.2.1: Likelihood Of Risk Event, P. 63	The PSPS likelihood is estimated based on ~~two inputs: a~~ historical PSPS event lookback. For the 2026 WMP and 2027 GRC filing, PG&E will no longer account for potentially impacted customers (PIC) due to the low incremental risk associated with these customers. ~~and the PICs for future PSPS events.~~

7	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 ~~(see Table PG&E 5.2.2-2 above)~~
8	Table update to remove PIC as it is no longer used in risk modeling assumptions and limitations	Table 5-1: Risk Modeling Assumptions And Limitations, P. 79-82	Replaced with updated table after removal of PIC language.
9	Narrative update to correct prompt formatting	Section 6.2.1.2: Risk Impact of Activities, P. 152	*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.* *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.* *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:* *For covered conductor installations, the expected installations from January 1, 2026, through December 31, 2028 = 600 circuit miles* *The total number of miles within the HFTD and HFRA = 4,250 circuit miles* *The expected % HFRA covered for the covered conductor installations activity from 2026 to 2028 is:* *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: *For protective devices and sensitivity settings, the total risk on January 1, 2026 =* *2.59 x 10–1* *After meeting its planned activity targets for protective devices and sensitivity settings, the total risk on December 31, 2028 = 1.29 ×10–1* *The expected x% risk reduction for the protective devices and sensitivity settings activity in 2026 is:* *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 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.* *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.*
10	Footnote added to clarify- 23% "Activity-Effectiveness-Outage Program Risk" reduction impact for Covered Conductor Installation	Table 6-3: Risk Impact of Activities, P. 154-155	Added additional footnote (e): Covered Conductor is estimated to be approximately 52% effective in mitigating EPSS outages but has no impact on PSPS planned outages. The resulting blended average effectiveness for Outage Program (defined as PSPS and EPSS) risk is 23%.
11	Footnote added to clarify- 100% "Activity-Effectiveness-Outage Program Risk" reduction impact for Undergrounding	Table 6-3: Risk Impact of Activities, P. 154-155	Added additional footnote (f): Undergrounding eliminates the need to implement outage programs (i.e. PSPS and EPSS) for the undergrounded lines because they do not pose the same risk as overhead assets during the extreme weather conditions that drive outage program events. However, as explained in Section 8.2.1 and 8.2.2, the

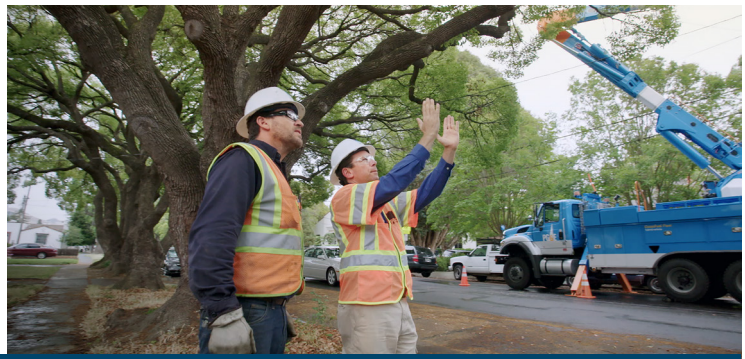
			degree to which an area with underground lines may still be subject to outage events depends on whether, and how much, the upstream line sections have been overhead hardened or undergrounded.
12	Table update to GH-04 and GH-12 risk scores to align with calculation methods	Table 8-1: Grid Design, Operation, And Maintenance Targets By Year, P. 182	Replaced Table 8-1 with updated risk scores. The changes are reflected in column "% Risk Reduction for (year)."
13	Footnote added for clarity	Table 8-1: Grid Design, Operation, And Maintenance Targets By Year, P. 183	Added additional footnote (b): PG&E may include in these calculations the mileage and risk reduction from new system hardening technologies, such as Ground-Level Distribution Systems (GLDS) discussed in ACI PG&E-25U-03, Section 2.3.
14	Narrative update to correct numbering error	Section 8.2: Grid Design and System Hardening, P. 184	*1) Covered conductor (CC) installation;* *~~Undergrounding of electric lines and/or equipment;~~* *2) Undergrounding of electric lines/or equipment;* *3) Distribution pole replacements and reinforcements;* *4) Transmission pole/tower replacements and reinforcements;* *5) Traditional OH hardening;* *6) Emerging grid hardening technology installations and pilots;* *7) Microgrids;* *8) Installation of system automation equipment;* *9) Line removal (in the HFTD);* *10) Other grid topology improvements to minimize risk of ignitions;* *11) Other grid topology improvements to mitigate or reduce Public Safety Power Shutoff (PSPS) events;* *12) Other technologies and systems not listed above; and* *13) Status updates on additional technologies being piloted*
15	Table updated to remove unnecessary line item and incorporate	Table PG&E-8.2.1-4: Covered Conductor And Undergrounding Impacts On The	Replaced table with removal of Risk Driver: Wire-to-wire Contact and included language in correct Risk Driver, Equipment Failure

	language into correct category	Likelihood Of Ignition, P. 200-201	
16	Table updated reflect correct HFTD %	Table 9-2: Vegetation Inspections And Pole Clearing By Year, P. 366	Replaced table with updated %. The changes are reflected in column % HFTD Covered in 2026.
17	Section 9.7.4 is misplaced under Section 9.6	Section 9.6: Defensible Space, P. 392	Section 9.7.4 has been moved under Section 9.7, P. 396.
18	Table summary updated to include HFTD/HFRA/Buffer Zone area language.	Table summary for Table 9-6: Vegetation Management QA and QC Activity, P. 420	VMQA and VMQC program targets are summarized in Table 9-6. • Reporting: PG&E will use the targets in Table 9-6 below for quarterly compliance reporting including the QDR, Quarterly Notification (QN), and the Annual Report on Compliance (ARC). We note that throughout this 2026-2028 WMP, we discuss current plans for wildfire-related activities beyond the targets in Table 9-6. The timing and scope of these additional activities may change. We will not be reporting on these activities in our QDR, QN, or ARC because they are not defined targets but are descriptions of plans and activities in our 2026-2028 WMP to provide a complete picture of our wildfire mitigation activities. • External Factors: All targets in this WMP are subject to External Factors. External Factors in this context represent reasonable circumstances which may impact execution against targets including, but not limited to, physical conditions, environmental delays, landowner or customer refusals or non-contacts, permitting delays/restrictions, weather conditions, removed or destroyed assets, wildfires, exceptions or exemptions to regulatory/statutory requirements, and other safety considerations. • Utility Initiative Tracking IDs (Tracking IDs): We are including Tracking IDs in each section that has associated targets. Table 9-6 displays the Tracking IDs we are implementing to tie the targets to the narratives and targets in the WMP. The Tracking IDs will also be used for reporting in the QDR.

			• High Fire Threat District (HFTD), High Fire Risk Area (HFRA), Buffer Zone Areas: Unless stated otherwise, all initiatives described in Table 9-6 either involve work or audits on units or equipment located in, traversing, or energizing HFTD, HFRA, or Buffer Zone areas.
19	Table update to include HFTD/HFRA/Buffer Zone area language and updated population size.	Table 9-6: Vegetation Management QA and QC Activity, P. 421	Replaced Table 9-6 to include HFTD/HFRA/Buffer Zone area language and updated population size.
20	Table updated with correct population size for VM-22P	Table 9-6: Vegetation Management QA and QC Activity, P. 421	Replaced table with updated population size for Vegetation Management Quality Control-Pole Clearing (VM-22P).
21	Narrative update to include HFRA language	Section 9.11: Quality Assurance and Quality Control, P. 422-423	In HFTD/HFRA, VMQC samples are sourced from completed VM inspected and/or tree work locations. See VM-22D; VM-22P; VM-22T in Table 9-6 for more information. VMQA and VMQC audit locations are sampled from HFTD/HFRA areas.
22	Table 9-9 is missing rows for tree crew workers.	Table 9-9: PG&E VMI Basic Web Based Courses, P. 430-433	Rows added for tree crew workers.

PG&E Wildfire Mitigation Plan

2026-2028 | Response to Revision Notice



Docket Title: 2026 to 2028 Electrical Corporation Wildfire Mitigation Plans
Docket #: 2026-2028-Base-WMPs

July 28, 2025

PACIFIC GAS AND ELECTRIC COMPANY
2026-2028 WILDFIRE MITIGATION PLAN

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REVISION NOTICE RESPONSE

Critical Issue RN-PGE-26-01

Critical Issue Title: *Targets include caveats for future changes.*

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.*

Remedy Response:

In response to Critical Issue RN-PGE-26-01 (1), PG&E removed footnote (c) from Table 8-1: Grid Design, Operation, and Maintenance Targes by Year from the 2026-2028 WMP R0.

In response to Critical Issue RN-PGE-26-01 (2), PG&E removed footnote (b) from Table 9-2: Vegetation Inspections and Pole Clearing Targets by Year from the 2026-2028 WMP R0.

Please see 2026-2028 WMP R1 Redline[1] for the removal of the above footnotes.

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1 The document is available at: PG&E's Community Wildfire Safety Program.

Critical Issue RN-PGE-26-02

Critical Issue Title: *Project prioritization is not properly represented.*

Required Remedies:

1. *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.*

Remedy Response:

Revisions to Table 5-5

In response to Critical Issue RN-PGE-26-02, Table 5-5 (now referred to as Table 5-5A[2]), Summary of Top Risk Circuit Segments has been revised (now referred to as Table 5-5B) to represent the risk per primary overhead mile and is provided below.

PG&E identified the top risk circuit segments that meet the two criteria established in the 2026-2028 WMP Guidelines[3] out of the 11,800 systemwide circuit segments that are modeled by the Wildfire Distribution Risk Model (WDRM) version 4. These criteria are:

- That the circuit segment individually contributes more than 1 percent of the total cumulative overall utility risk per primary overhead mile; and
- That the circuit segment contributes to the top 5 percent of cumulative overall utility risk per primary overhead mile.

The outcome of the analysis shows the following:

- There are 7 circuit segments that contribute more than 1 percent of the distribution system overall utility risk per primary overhead mile.
- After ranking the circuit segments from highest to lowest overall utility risk per primary overhead mile, we found that the top two circuit segments contribute to the top 8.28 percent of the total overall utility risk per primary overhead mile. These are the top two segments in Table 5-5B.
- In Table 5-5B, we also include the top 275 circuit segments that contribute to the top 20 percent of total overall utility risk per primary overhead mile to provide a more comprehensive representation of where the overall wildfire risk per primary overhead mile is concentrated.

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2 A complete list of Table 5-5A is available in the 2026-2028 WMP R1, Vol 2, Appendix F.

3 Final Wildfire Mitigation Plan Guidelines (Feb. 24, 2025) at 53-54.

Table 5-5B below shows a partial list of our top risk circuit segments due to the length of the table. A complete list is available in Appendix A of the Revision Notice Response, and Appendix F of the Base 2026-2028 WMP R1.

Table 5-5B is a list of the circuit segments with the highest overall utility risk per primary overhead mile in PG&E's service territory; however, PG&E does not prioritize wildfire mitigations based on this table. Each mitigation program develops a risk-prioritized work plan custom to the program's risk drivers and execution of work. For example, PG&E prioritizes system hardening work based on wildfire risk per mile, with the exception of circuit segments with very short lengths which artificially inflate their risk per mile.

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
1	DUNBAR 11034882	176.19	0.18	176.01	PSPS	0.00	WDRM v4
2	PUEBLO 1104968601	126.37	6.92	119.45	PSPS	0.01	WDRM v4
3	ARBUCKLE 110130376	97.21	0.16	97.05	PSPS	0.00	WDRM v4
4	VACAVILLE 111112342	82.76	1.44	81.33	PSPS	0.01	WDRM v4
5	BALCH NO 1 1101CB	72.56	72.55	0.00	Wildfire	0.12	WDRM v4

Revisions to Table 6-4

Table 6-4 (now referred to as Table 6-4A[4]), Summary of Risk Reduction for Top Risk Circuit Segments has been revised (now referred to as Table 6-4B) to represent the risk per primary overhead mile.

Table 6-4B below shows our summary of risk reduction activities for the top-risk circuits where PG&E's workplans identify the work locations. Table 6-4B is based on our workplans as of July 23, 2025. The activities listed below are not objectives or targets for quarterly or annual reporting purposes in connection with the 2026-2028 WMP. There are various factors that may impact project completion schedules and therefore impact risk reduction in certain years, for example, external constraints like permitting and customer authorizations. We are including both control and mitigation initiatives in this table to demonstrate the layers of system protection, whether or not they provide in-year or long-term system resiliency benefits for the years listed below. Circuit segments in Table 6-4B are ranked by initial overall utility risk per primary overhead mile. Table 15 of the Annual WMP Template will not be updated to reflect the changes in Table 6-4B because Table 15 captures the Overall Risk Score, not Overall Utility Risk per Primary Overhead Mile.

Table 6-4B below shows a partial list of risk reduction of the top risk circuits due to the length of the table. A complete list is available in Appendix A of the Revision Notice Response, and Appendix F of the Base 2026-2028 WMP R1.

Table 6-4B is a list of the circuit segments with the highest overall utility risk per primary overhead mile in PG&E's service territory; however, PG&E does not prioritize wildfire mitigations based on this table. Each mitigation program develops a risk-prioritized work plan custom to the program's risk drivers and execution of work. For example, PG&E prioritizes system hardening work based on wildfire risk per mile, with the exception of circuit segments with very short lengths which artificially inflate their risk per mile.

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4 A complete list of Table 6-4A is available in the 2026-2028 WMP R1, Vol 2, Appendix F.

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
1	DUNBAR 11034882	176.19	Vegetation routine patrol Vegetation hazard patrol	176.19	Vegetation routine patrol Vegetation hazard patrol	176.19	Vegetation routine patrol Vegetation hazard patrol	176.19
2	PUEBLO 1104968601	126.37	EPSS Vegetation routine patrol Vegetation hazard patrol	122.22	EPSS Vegetation routine patrol Vegetation hazard patrol	122.22	EPSS Vegetation routine patrol Vegetation hazard patrol	122.22
3	ARBUCKLE 110130376	97.21	Vegetation routine patrol Vegetation hazard patrol	97.21	Vegetation routine patrol Vegetation hazard patrol	97.21	Vegetation routine patrol Vegetation hazard patrol	97.21
4	VACAVILLE 111112342	82.76	EPSS Vegetation routine patrol Vegetation hazard patrol	81.88	EPSS Vegetation routine patrol Vegetation hazard patrol	81.88	EPSS Vegetation routine patrol Vegetation hazard patrol	81.88
5	BALCH NO 1 1101CB	72.56	EPSS Vegetation routine patrol Vegetation hazard patrol	25.24	EPSS Vegetation routine patrol Vegetation hazard patrol	25.24	EPSS Vegetation routine patrol Vegetation hazard patrol	25.24

Critical Issue RN-PGE-26-03

Critical Issue Title: *Decision-making process for system hardening is insufficiently supported.*

Required Remedies:

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.*

Remedy Response:

1. <u>Explanation for the Use of a 50% Cost-Benefit Ratio Threshold</u>

PG&E is incorporating the Cost-Benefit Ratio (CBR) into our decision-making framework in anticipation of this requirement as part of the 10-year Electrical Undergrounding Plan (EUP).[5] In PG&E's decision tree, two economic analyses are considered when evaluating potential mitigation measures:

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5 PG&E intends to file an EUP after all EUP Guidelines are adopted by Energy Safety and the CPUC and anticipates transitioning the undergrounding program to the EUP for 2028.

(1) CBR (calculated as: Cost Benefit Ratio = Benefits / Costs over the lifespan of the asset); and

(2) Net Benefit (NB) (calculated as: Net Benefit = Benefits – Costs over the lifespan of the asset).

In this response to Remedy 1, PG&E discusses the limitations in risk modeling and why it is reasonable to include a 50 percent threshold in our cost/benefit analysis given the lack of detailed, location-specific information related to ingress-egress risk, tree strike risk and climate change in risk models. In response to Remedy 2 below, PG&E further explains the limitations of the tree strike data in our risk models and why it is important for us to conduct additional tree strike reviews beyond what is included in the risk model. In response to Remedy 3, PG&E further explains why the generalized demographics data used by WDRM v4 is insufficient to fully understand ingress and egress factors for mitigation selection.

In PG&E's system hardening decision tree, CBR is an important criteria that we consider when evaluating mitigation alternatives, but it is not the only one. PG&E also considers Net Benefit. The Net Benefit analysis shows which mitigation alternative will result in the most benefit for customers (including cost savings) over the life of the asset. For circuit segments where the CBR for undergrounding is lower than the CBR for overhead hardening with Enhanced Powerline Safety Settings (EPSS), but the net benefits of undergrounding are more favorable than overhead hardening with EPSS, PG&E also considers these circuit segments for undergrounding, provided the undergrounding CBR falls within an acceptable threshold (50 percent) relative to the CBR of overhead hardening. In all cases, the CBR for any alternative must be greater than 1.0, indicating that the benefits of the mitigation outweigh its costs.

While the 50 percent CBR threshold is discretionary, it is not arbitrary. The primary reason for implementing a 50 percent threshold is to account for significant risks which are not fully represented within a cost benefit analysis, particularly ingress/egress, tree strike, and climate change. These risks are not fully captured in the CBR calculation at the circuit segment level and, therefore, must be reviewed outside of the standard CBR framework. We describe these individual risks, why they are not fully represented in the risk model, and the extent to which they can be quantified below. Establishing such a threshold to account for the limitations in modeling is a necessary element in all decision-making, and PG&E has used similar thresholds to inform project selection in previous WMPs.

The mitigation cost estimates used in the CBR calculation—during the early phase of project selection—are considered by the Association for the Advancement of Cost Engineering (AACE) a "Class 5" estimate. Per the AACE, Class 5 estimates can vary significantly, from +100% to -50% when compared to a project's final recorded costs,

and are typically used for strategic planning and concept screening.[6] Given this cost uncertainty range, the fact that Class 5 estimates are typically used for strategic planning and concept screening, and the variance a cost estimate can have on a CBR, the 50 percent threshold that PG&E uses as a basis for further evaluating the benefits of undergrounding is reasonable, as it aligns to the industry standard for cost estimate classification and project scope maturity.

Adopting a more conservative approach to project selection, which acknowledges where uncertainties exist in risk modeling and considers the absolute benefits of each mitigation, aligns with PG&E's risk management strategy to prioritize risk elimination over containment. As such, it is reasonable to consider, and potentially select undergrounding, when Net Benefit is most favorable and where these uncertainties exist, because undergrounding eliminates the risk of tree strikes that can damage overhead lines, addresses ingress/egress concerns, and offers greater protection against the effects of climate change, which overhead hardening does not.

Ingress/Egress Risk

Ingress/Egress Risk refers to the challenges and hazards associated with accessing and evacuating areas during wildfire events. This critical risk directly impacts the ability of emergency responders to reach affected areas and for residents to evacuate safely. Terrain, road conditions, and the presence of obstacles such as poles falling across roads, downed trees and debris can significantly hinder these efforts. For example, narrow and windy roads in mountainous areas may be blocked during a wildfire, which can present access challenges for both residents and firefighters and affect emergency provider response times.

While WDRM v4 introduces the use of Ingress/Egress Risk data, which previous versions of our WDRM did not, the information captured in the CBR for Ingress/Egress Risk is typically very high-level, often stopping at the city or county level, and does not account for local conditions that are essential for conducting an accurate risk assessment. In contrast, during the decision tree review, our Grid Design engineers conduct a detailed analysis of local conditions to the street level that impact ingress and egress. This granular approach allows them to identify specific ingress and egress challenges that may not be apparent in city or county-level data. For instance, they can assess the condition of specific roads, the presence of potential obstacles, and the overall accessibility of the area. This detailed review is crucial for developing effective mitigation strategies and ensuring that PG&E accounts for all potential risks. Incorporating location-specific ingress and egress assessments into our risk management processes allows us to make more informed decisions about which mitigation is most appropriate to address the risks in that specific location. It is important to conduct a location-specific Ingress/Egress Risk evaluation and incorporate the

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6 Summary of AACE International Cost Classifications and Expected Ranges of Accuracy - https://www.processengineer.com/insights/capital-cost-estimate-classes.

findings into our mitigation decision-making process to address a limitation of our risk model.

Tree Strike Risk

Tree Strike Risks are the risk of trees or branches falling onto power lines which can ignite wildfires. This risk is influenced by several factors including the health and species of trees, environmental conditions, and the proximity of trees to power lines. The variability in these factors makes it challenging to accurately predict and quantify tree strike risk. For example, a healthy tree today could become a hazard tomorrow due to disease, pest infestation, or severe weather conditions. Additionally, certain tree species are more prone to falling or dropping branches, further complicating risk assessments and necessitating up to date information when evaluating a location for system hardening work.

The information captured in the CBR for tree strike risk is very high-level, aggregated data and represents a snapshot in time based on the information available when the WDRM v4 was developed. This static approach can overlook dynamic changes in tree health and environmental conditions that occur over time. In contrast, during the System Hardening decision tree review, our Grid Design engineers use the most recent LiDAR information available and satellite imagery which provides a much more granular and up-to-date view of the area. The decision tree process not only considers trees that are tall enough to strike the lines but also assesses their potential to strike and break hardened conductors. This real-time data is invaluable for making informed decisions and implementing appropriate mitigations. Using system, region, or even city or county averages would dilute the data we use to select the right mitigation for a location. Including detailed, location-specific tree strike assessments in our risk management enables more effective, targeted mitigation decisions to address risks in that specific location. Evaluating tree strike risks with up-to-date, location-specific data ensures our mitigation strategies address a limitation of our current risk model.

Climate Change

PG&E's models use mitigation effectiveness values that do not address significant, changing risks from climate change related to certain mitigations alternatives. For example, the California Energy Commission's fourth climate change assessment studied the exposure of specific locations to increased frequency and larger wildfires due to climate change. The study found that extreme wildfire events are expected to increase in frequency, with fires greater than 10,000 hectares occurring nearly 50% more often by the end of the century.[7] This creates uncertainty around the lifespan of overhead (OH) mitigation measures. For example, if the lifespan is reduced by 10-20 years from current assumptions, the CBR of the overhead mitigation alternative could significantly decrease. Additionally, data from two climate change scenarios suggest that, on average, circuit segments could experience 10-35 percent more days per year

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7 California's Fourth Climate Change Assessment, Statewide Summary Report, page 30.

with a fire weather index worse than the 95th percentile fire weather index from the last 20 years. This could reduce the overall effectiveness of overhead mitigation measures.

In addition to these three risks that are not fully accounted for in our CBR analysis, we also identified additional limitations in our models that contribute to model uncertainty.

- *Wildfire Benefit Cost Analysis (WBCA) Input Limitations*: PG&E developed its WBCA tool to compare the long-term costs and quantifiable benefits of undergrounding to other mitigations. The WBCA inputs may not include all potential costs and benefits and may not represent the specific costs and benefits at certain locations. For example, many of the operations and maintenance cost assumptions in the model are based on systemwide or regional averages while the cost to operate and maintain assets can vary significantly based on specific, local issues such as terrain, access, weather and permitting requirements.

- *Total Bowtie Risk Score*: Risk model scores can be highly variable. Our risk models are calibrated based on observations from the past decade, but many of the major factors that impact the risk score vary significantly. For instance, if we were to experience another severe wildfire weather year, as was observed in 2017 in the calibration dataset, the risk score could increase by up to 30% compared to current estimates.

- *WDRM Risk Score Allocation*: The WDRM allocates service territory-wide wildfire risk to specific circuit segments. However, because there is a lag of more than six months between when updates or changes to the grid occur and mapping those updates and changes in GIS, the allocation of wildfire risk to circuit segments may not reflect or account for current asset health or grid conditions.

- *Unprecedented Weather Events*: It is possible that over time we will experience weather events that have not been historically observed. Because weather cannot be precisely forecast years in advance, PG&E's PSPS lookback dataset assumes that the scale and frequency of past weather events will be consistent in the future. Unprecedented weather events could introduce new risks and challenges that our current models do not fully account for, further increasing uncertainty and the need for risk averse mitigations.

2. Explanation for the Tree Strike Potential Threshold

In response to Remedy 1, PG&E explains how the lack of current, location-specific tree strike data in our model impacts our CBR-based mitigation decision-making and why it is important to incorporate more detailed LiDAR data into our mitigation selection process. In response to Remedy 2, PG&E provides more detailed information about how generalized tree strike data is incorporated into WDRM and why additional tree strike assessments outside of the risk model are needed to support our mitigation decisions.

PG&E uses a tree strike score in the CBR calculation. The tree strike scores represent the number of fall-in trees that can touch and break a hardened overhead line.[8] While PG&E described tree strike risk differently in our decision trees in our 2023-2025 and 2026-2028 Base WMPs, the logic around how we use the decision tree to evaluate tree strike risk has not changed. PG&E continues to use six or more trees as the threshold for determining if tree strike potential warrants considering undergrounding instead of overhead hardening. PG&E's Grid Design and Vegetation Management experts determined that six trees was a reasonable threshold past which we initiate the SME review to determine if undergrounding is an appropriate mitigation solution. The changes in how we describe tree strike risk in between the two WMPs reflects the fact that we simplified the tree strike risk categories/label to align with the binary decision tree logic. There is either low tree strike risk or there is sufficient tree strike risk (now labeled high but previously labeled moderate/high) to warrant considering undergrounding. The logic around tree strike has not changed and continues to be that an area with a tree strike score of 6 or higher is identified as "Area of impact identified, relocate to underground preferred." An area with a tree strike score between 0 and 5 is identified as: "No area of impact identified, OH in place preferred."[9]

PG&E's current risk model, WDRM v4, produces vegetation risk values that represent the condition of the distribution asset network as of January 1, 2023. The three vegetation models (branch, trunk, and other causes) all consider attributes such as strike tree count, strike tree count per mile, average strike tree height, and maximum strike tree height to produce risk values. The strike tree attributes were developed from satellite data provided by Planet Labs.[10] The WDRM v4 vegetation risk values are generalized representations of strike risk and must be augmented by expert engineering assessments during work planning prioritization to account for additional vegetation growth since January 2023 and the potential strike risk changes inherent in any proposed mitigation work due to relocation of distribution assets or coincidental removal or mitigation of trees.

In contrast, the assessment of tree strike risk that takes place during project scoping and mitigation selection considers the post-mitigated risk in terms of how trees could impact a future mitigated line. This is a distinct analytical step in the system hardening decision-tree that occurs during scoping and involves modeling the ability of trees to break a future hardened overhead line. This analysis is critical to the mitigation selection process because it models a future overhead hardened (covered conductor) line and assesses whether trees in the area could strike or break that hardened line. Because covered conductor is heavier and can cause lines to sag, the new hardened system is typically constructed on taller poles. This analysis must reconsider the existing strike tree count and strike tree height to assess the future likelihood of a tree striking a new

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8 PG&E's Revised 2022 WMP, July 26, 2022, pages 584-585.

9 These tree strike designations are included in PG&E's approved 2023-2025 Base WMP, R8, p. 432.

10 Formerly Salo Sciences, which was acquired by Planet Labs.

hardened line, as well as the separate question of whether that strike would actually break the hardened line. The initial engineering analysis is then followed by a field visit to those locations by our vegetation teams verifying the modeled conditions, considering tree species, slope and other mitigation actions taken in those areas. The information from the vegetation teams is shared and discussed during field scoping desktop meetings where the system hardening scope can be modified, if needed. The baseline risk value is not modified during or after reviewing these conditions. What the review does change is the effectiveness of the mitigation and the projected cost of the overall project based on the amount of underground and overhead targeted within the Circuit Protection Zone (CPZ) for the hybrid scenario. This review simply allows PG&E to target undergrounding in areas within the CPZ when a primary underground mitigation of the entire CPZ does not meet the economic criteria outlined in the System Hardening decision tree.

3. Explanation for the Ingress and Egress Threshold

In response to Remedy 1, PG&E describes how the lack of location-specific ingress/egress data in our risk model impacts our mitigation decision-making and why we incorporate additional information from site-specific ingress/egress reviews into our mitigation selection process. In response to Remedy 3, PG&E further describes the generalized demographics data used in WDRM v4 and why it is insufficient for understanding ingress and egress factors for mitigation selection.

The Wildfire Consequence Model, version 4, (WFC v4) values used by WDRM v4 include adjustments for egress and suppression (which considers ingress).

Research by PG&E's consequence data science team found that egress considerations were best modeled by mobility issues within a threatened population. In general, egress issues were not related to road infrastructure, but rather who was physically able to leave and when the decision to leave was made. However, while PG&E works to identify people with Access and Functional Needs (AFN) through self-reporting and outreach programs, we cannot be sure that we have identified everyone. Therefore, generalized age demographics are used as a proxy for determining the egress consequence adjustment for any given location. The suppression consequence adjustment, which encompasses ingress factors, is modeled using Technosylva's high-level Terrain Difficulty Index (TDI) which assesses on an integer scale from 1 to 5 the difficulty for resources to respond to an ignition event for any given location.

Both the egress and suppression consequence adjustments are modeled using data that is available only at a much coarser granularity than the 100m-by-100m pixel results produced by the Consequence Model. Thus, the consequence values used by WDRM v4 are generalized for an area and must be augmented by expert engineering analysis for specific CPZs considered for system hardening.

The generalized demographics data used by WDRM v4 lacks sufficient granular detail for fully understanding ingress and egress factors for mitigation selection and hybrid project scoping purposes. PG&E's system hardening decision-making process for

hybrid projects, thus, includes a separate step to assess the various ingress and egress considerations for different mitigations. This step includes analysis by the Public Safety Specialist (PSS) in the area. Our decision tree involves input from these experts with local knowledge who can provide insight on community factors such that we can target underground where it would be most effective.

- The PSS considers many factors when evaluating ingress and egress concerns. The specific circumstances at each location must be considered on a case-by-case basis. The specific circumstances at a location form our understanding of the real time risk in a particular area. Some of the factors considered include: Population density;

- Time of day (there are differences between evacuating communities at night, when most people are at home, compared to during the day when fewer people are at home);

- The amount of time the public would need to evacuate or shelter in place;

- Notifications and information made available to the public;

- Road infrastructure (e.g., road size, number of lanes, type of surface, destination);

- Fuel types along an evacuation corridor (e.g., grass vs. brush vs. timber)

- Elevated Weather conditions (e.g., red flag days including high temperatures, high winds, low relative humidities);

- Topography/terrain (do evacuation routes place evacuees in danger due to steep slopes, drainages, and chimneys along a corridor which are often associated with extreme fire behavior);

- Human factors (e.g., elderly, special needs, evacuating large and small pets, knowledge or experience of citizens living in high fire hazard areas);

- Location of overhead electrical assets (e.g., a pole's proximity to the road's shoulder, conductor crossings over those ingress/egress thoroughfares should they become impacted by fire and fail onto the evacuation corridor); and

- Firefighting ingress (e.g., number, type, size of equipment, staging areas, etc.).

The result of the PSS ingress/egress review is shared and discussed during our field scoping desktop meeting where the underground scope can be modified, if needed.

The baseline risk value is not modified as part of the ingress/egress review. This review simply allows PG&E to target undergrounding in areas within the CPZ (or at the sub-project level) when a primary underground mitigation of the entire CPZ does not meet the economic criteria outlined in the decision tree. This review informs the

effectiveness of the mitigation, and the projected cost of the overall project based on the amount of underground and overhead targeted within the CPZ for the Hybrid scenario.

4. Explanation for the PSPS Threshold

In response to Remedy 4, PG&E provides an explanation of the PSPS threshold in the hybrid analysis, and how the reliability risk considered in our WDRM v4 risk model and cost-benefit ratio analysis is distinct from the risk assessed in our system hardening decision-tree. PG&E is also providing additional information about the relationship between PSPS events and undergrounding.

The WDRM produces wildfire risk values due to unplanned outages and assumes that no operational mitigation programs such as PSPS are available. The WDRM also does not consider customer reliability when assessing the wildfire risk.

Historical PSPS events are reviewed during WDRM development for the purpose of adjusting the historical failure data sets used to train the WDRM model. For example, if a conductor breaks due to a falling branch while a circuit is de-energized for a PSPS event, that failure would be added to the WDRM failures training data set as if an unplanned outage had occurred. Otherwise, the WDRM would underestimate unplanned outage and ignition risk values. The initial CBR framework evaluates the total PSPS risk at the CPZ level, which can obscure the localized risks and reliability impacts within sub-circuit segments. Therefore, it is important to perform a more detailed sub-circuit segment level assessment of PSPS risk.

The System Hardening decision tree includes a PSPS assessment step for hybrid projects to understand how various combinations of hybrid mitigations could affect customer impacts from PSPS events. This step in the decision tree involves considering individual weather polygons from the most current PSPS lookback data to identify sub-circuit segment areas where undergrounding would reduce individual PSPS event risk. This analysis considers PSPS events that only affect parts of the CPZ, not the whole CPZ, in order to implement targeted undergrounding to reduce PSPS impacts in those sub-circuit segment areas. As undergrounding is the only mitigation that reduces PSPS risk and each PSPS event is unique, this review is conducted as part of the scoping process, and proposed undergrounding to mitigate PSPS risk is discussed as part of the field scoping desktop meeting. Because not all PSPS events are the same and events typically impact only portions of a given circuit segment—and not the whole CPZ—there is no specific PSPS decision-making threshold. When evaluating the PSPS risk on a circuit segment PG&E reviews the polygons from different events in our PSPS lookback model and evaluates how much undergrounding would be required to mitigate the PSPS risk. We refine the scope of the system hardening work to incorporate undergrounding only if doing so allows the hybrid project to meet our economic decision-making criteria as described in the “Begin Hybrid Cost Benefit Analysis” section of the Decision Tree, Figure PG&E-8.2.1-2. PG&E is directed in the EUP to mitigate outage program risk and through project scoping works to strike a balance

between PSPS risk reduction and cost by performing an engineering analysis to reduce as much risk as practicable while delivering a cost-effective solution.[11]

The baseline risk value is not modified in the review of these conditions. This review simply allows PG&E to target undergrounding in areas within the CPZ when a primary underground mitigation of the entire CPZ does not meet the economic criteria outlined in the decision tree. This review informs the effectiveness of the mitigation and the projected cost of the overall project based on the amount of underground and overhead targeted within the CPZ for the Hybrid scenario.

5. Explanation for the Use of EPSS in Decision-Making

EPSS plays an important role throughout PG&E's system hardening project scoping process. EPSS is included in all overhead hardening alternatives because it enhances the effectiveness of overhead hardening (covered conductor plus EPSS) and, therefore, is embedded in PG&E's mitigation decision-making process.

When the scoping decision tree leads to a hybrid scope analysis, EPSS is not included as a specific driver for the need to underground. This is because, unlike other drivers such as tree fall in risk, ingress/egress, or PSPS risk, an underground mitigation partially implemented on a CPZ would not eliminate the need for EPSS. EPSS is implemented at the Dynamic Protective Device level, which is often also used as the parameter for bounding CPZ's. The cause of many EPSS events are unknown, leading to very limited datasets for selecting undergrounding as the mitigation solution to eliminate EPSS impacts. This leads to the following postulates to be considered true for scoping:

- EPSS events affect the entire CPZ;
- EPSS events are not planned events;
- EPSS events can be trended at a CPZ level, but not effectively at a lower device level; and
- EPSS will be enabled if any overhead primary conductor exists in its protective zone.

Therefore, for the purposes of the decision tree, hybrid analysis, and overall mitigation decisions, EPSS is considered part of every comparison including overhead hardening

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11 In the 2026-2028 Revision Notice, Energy Safety states that, "[a]lthough PG&E listed only a single hybrid undergrounding project as meeting the PSPS criterion, but 51 percent of circuit protection zones in PG&E High Fire Risk Area (HFRA) have been impacted by PSPS. 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." The Office of Energy Infrastructure Safety Issuance of Revision Notice for the Pacific Gas and Electric Company 2026-2028 Base Wildfire Mitigation Plan, June 27, 2025, p. 8.

and does not require individual consideration as a targeted driver for undergrounding at a sub-CPZ level.

6. Explanation of Alternative Mitigations

The mitigations listed in Table PG&E-8.2.1-3 are the primary mitigation alternatives PG&E considers in its system hardening decision-making process. PG&E is open to considering additional alternatives as new mitigations become available.

While covered conductor without EPSS, PSPS, or DCD is listed on Table PG&E-8.2.1-3, PG&E does not generally consider covered conductor by itself as a reasonable mitigation option since covered conductor with EPSS, DCD and/or PSPS is more effective at mitigating ignition risk. Additionally, we would not consider covered conductor without EPSS and/or PSPS since PG&E has deployed EPSS throughout the HFRA and considers all circuit segments in the HFRA when conditions call for PSPS. Similarly, PG&E does not consider bare conductor rebuild with EPSS, DCD and/or Partial Voltage Protection because bare conductor does not meet PG&E's rebuild standards.

Certain mitigations, such as REFCL, are not readily available for broad-scale implementation. REFCL, for example, has limitations including:

- No risk reduction for line-to-line or three-phase faults;
- Operational complexity;
- Limited flexibility in distribution circuits;
- Challenges with fault location;
- Only applicable to single voltage 3-wire 12 kV substations;
- Requires minimum 20 overhead miles in HFTD;
- Less than 50% of circuits can be underground for REFCL to function properly;
- Physical space limitations at substations;
- Out of approximately 435 distribution substations serving HFTD/HFRA segments, at least 302 were deemed not feasible for REFCL deployment, without even assessing whether sufficient physical space is available for installation; and
- REFCL is less effective in areas with significant large tree habitats compared to regions with low-lying vegetation.

TABLE PG&E-8.2.1-3:
IGNITION MITIGATION EFFECTIVENESS
REPRESENTATIVE BLENDED AVERAGE VALUES

System Hardening Scenarios	Blended Average Effectiveness[(a)]
Underground All (Underground Primary Lines, Secondary Lines and Services)	99%
Underground Primary Distribution Lines	98%
Line Removal w/ Remote Grid	98%
Covered Conductor with EPSS and PSPS[(b)]	97%
Covered Conductor with EPSS and DCD	79%
Covered Conductor	67%

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Note: Assumptions – Analysis assumes no overhead degradation for life of the asset.

(a) This effectiveness evaluation is based on an assessment of each mitigation's prevention of an ignition from active faults of known cause on overhead assets. Company-initiated outages, including PSPS outages, outages of Unknown cause, as well as outages on existing underground assets are not applicable to this study and are excluded from calculation results as "N/A."

(b) The combined "Overhead with EPSS and PSPS" effectiveness differs from others in the table as it is the result of two independent studies. The first study yields PSPS effectiveness alone to be approximately 84 percent effective at mitigating wildfire risk. Subsequently, the combined effectiveness of approximately 79 percent for "Overhead with EPSS" is applied on top of the PSPS reduction, resulting in: Mitigation Effectiveness = 84% + (100% 84%) * 79% = 97%.

Critical Issue RN-PGE-26-04

Critical Issue Title: *Combined targets for covered conductor, remote grids, and line removal.*

Required Remedies:

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.

Remedy Response:

In response to Critical Issue RN-PGE-26-04, PG&E separated the elements of the GH-12 initiative into distinct initiatives to distinguish targets between overhead lines hardened with covered conductor and overhead lines removed resulting from remote grid installations. The updated targets are depicted in Table PG&E-RN-PGE-26-04-01 below and are reflected in updated Table 8-1: Grid Design, Operation, and Maintenance Targets by Year of the 2026-28 Base WMP submitted in response to this Revision Notice.

TABLE PG&E-RN-PGE-26-04-01:
UPDATED GH-12 AND GH-14 TARGETS

WMP Initiative	2026	2027	2028	2026-2028 Total
Revised GH-12 – Overhead Hardening - Distribution	294	190	190	674
(New) GH-14 – Line Removal Enabled by Remote Grid – Distribution	4	0	0	4

Table PG&E-RN-PGE-26-04-02 shows our original GH-12 targets and one adjustment we made, in compliance with RN-PGE-26-04, to determine revised GH-12 targets.

TABLE PG&E-RN-PGE-26-04-02:
ADJUSTMENTS TO GH-12 TARGETS

	2026	2027	2028	2026-2028 Total
Original WMP Targets: GH-12	**318**	**200**	**200**	**718**
Adjustment: remove remote grid LR	-24	-10	-10	-44
Revised WMP Targets: GH-12	**294**	**190**	**190**	**674**

The adjustment that removes remote grid line removal from the GH-12 target in Table PG&E-RN-PGE-26-04-02 is based on the assumed forecast of line removal enabled by remote grid at the time of the 2026-2028 Base WMP filing on April 4, 2025. Many of the projects within that forecast of "remote grid LR" miles are relatively low-confidence projects, due to the substantial schedule risks associated with remote grid projects discussed below. Under the combined GH-12 target PG&E originally proposed, PG&E would have leveraged the flexibility to deploy additional Overhead Hardening or Line Removal miles to meet our overall GH-12 target if some of those remote grid LR miles were delayed. However, with the direction to segregate the targets, PG&E has set the new, required GH-14 target based on identifying specific projects within the original forecast that have high confidence of executing in each of the WMP years. Consequently, our new GH-14 target includes only the mileage (four miles) that is currently planned with high confidence during the 2026-2028 period. Remote grid installations rely on customer agreements and are subject to a number of significant schedule risks including customer commitment, land availability, terrain, land use restrictions, environmental permits, future load growth, and site access. The GH-14 target also reflects the relatively small size of PG&E's Remote Grid portfolio, which limits our ability to substitute one remote grid project for another if unexpected issues arise with a planned project based on the risks noted above. As the remote grid portfolio of projects continues to mature, we may use the WMP Annual Update process to update the 2027 and 2028 GH-14 targets.

In response to Critical Issue RN-PGE-26-04, we clarify that the new GH-14 target only includes line removal associated with remote grid installation.[12] We set a mileage target for overhead line removal enabled by remote grid installation rather than a target for number of remote grids installed because line mileage removed drives the wildfire risk reduction associated with this initiative and occurs subsequent to the installation of the remote grid. The number of standalone power systems (i.e., remote grid units) installed does not drive risk reduction and is therefore ancillary to the ultimate goal and focus of this initiative. We are not setting a separate line removal target for primary conductor

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12 Energy Safety states, "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."

removal through the idle facilities program in HFTD or line removal miles driven by circuit re-routing for following reasons:

- Primary conductor removal through the idle facilities program in HFTD are not part of targeted system hardening work – they are emergent work, identified during system inspections, and appropriately prioritized and addressed as part of PG&E's tag reporting and commitments when idle facilities are in an HFTD area (compliance MAT 2AF).

- Circuit re-routing line removal miles are not a targeted mitigation but instead are an incidental outcome of scoping for targeted overhead and underground hardening when there is re-routing involved.

Line removal mileage from idle facilities and circuit re-routing will not be reported in actuals towards the GH-14 target.

TABLE 8-1:
GRID DESIGN, OPERATION, AND MAINTENANCE TARGETS BY YEAR

Initiative	Quantitative or Qualitative Target	Activity (Tracking ID #)	Previous Tracking ID (if applicable)	Target Unit	2026 Target / Status	% Planned in HFTD for 2026	% Planned in HFRA for 2026	% Risk Reduction for 2026	2027 Target / Status	% Planned in HFTD for 2027	% Planned in HFRA in 2027	% Risk Reduction for 2027	2028 Target / Status	% Planned in HFTD for 2028	% HFRA planned in 2028	% Risk Reduction for 2028	Three-Year Total	Section; Page Number
Grid Design, Operations, and Maintenance	Quantitative (Quarterly)	Detailed Inspection - Transmission (AI-04)	AI-04	Transmission Structures	22,000	96.5%	100%	63.78% (Eyes on Risk)	22,000	96.5%	100%	63.78% (Eyes on Risk)	22,000	96.5%	100%	63.78% (Eyes on Risk)	66,000	8.3.1; p. 235
Grid Design, Operations, and Maintenance	Quantitative (Quarterly)	Infrared Inspections - Transmission (AI-06)	AI-06	Circuit miles	2,500	94.6%	100%	72.95% (Eyes on Risk)	2,500	94.6%	100%	72.95% (Eyes on Risk)	2,500	94.6%	100%	72.95% (Eyes on Risk)	7,500	8.3.3; p. 238
Grid Design, Operations, and Maintenance	Quantitative (Quarterly)	Aerial Scan Inspections - Distribution (AI-07A)[(a)]	n/a	Distribution Poles	50,000	98%	100%	24% (Eyes on Risk)	20,000	99%	100%	12% (Eyes on Risk)	20,000	98%	100%	9% (Eyes on Risk)	90,000	8.3.8 p. 243
Grid Design, Operations, and Maintenance	Quantitative (Quarterly)	Detailed Inspections - Distribution (AI-07D)[(a)]	AI-07	Distribution Poles	300,000	98%	100%	33% (Eyes on Risk)	305,000	94%	100%	47% (Eyes on Risk)	215,000	98%	100%	48% (Eyes on Risk)	820,000	8.3.8; p. 243
Grid Design, Operations, and Maintenance	Quantitative	System Hardening - Undergrounding (GH-04)(b)(e)	GH-04	Circuit Miles	360 (c)	100%	100%	1.4%	307	100%	100%	2.2%	400	100%	100%	2.4%	1,067	8.2.2; p. 204
Grid Design, Operations, and Maintenance	Quantitative	System Hardening - Transmission Shunt Splices (GH-06)	GH-06	Shunt Splices	250	100%	100%	0.07%	250	100%	100%	0.07%	250	100%	100%	0.07%	750	8.2.5.1; p. 211
Grid Design, Operations, and Maintenance	Quantitative	System Hardening - Transmission Conductor Segment Replacement (GH-11)	GH-11	Conductor Segment	4	100%	100%	0.05%	5	100%	100%	0.05%	6	100%	100%	0.05%	15	8.2.5.1; p. 211
Grid Design, Operations, and Maintenance	Quantitative	Overhead Hardening - Distribution (GH-12)[(e)]	GH-01 (d)	Circuit Miles	294	100%	100%	1.2%	190	98.7%	100%	1.0%	190	99.0%	100%	0.6%	674	8.2.1; p. 187
Grid Design, Operations, and Maintenance	Quantitative	Line Removal Enabled by Remote Grid - Distribution (GH-14)[(e)]	GH-01	Circuit Miles	4	100%	100%	0.04%	0	n/a	n/a	n/a	0	n/a	n/a	n/a	4	8.2.7.1; p. 214

TABLE 8-1:
GRID DESIGN, OPERATION, AND MAINTENANCE TARGETS BY YEAR
(CONTINUED)

Initiative	Quantitative or Qualitative Target	Activity (Tracking ID #)	Previous Tracking ID (if applicable)	Target Unit	2026 Target / Status	% Planned in HFTD for 2026	% Planned in HFRA for 2026	% Risk Reduction for 2026	2027 Target / Status	% Planned in HFTD for 2027	% Planned in HFRA in 2027	% Risk Reduction for 2027	2028 Target / Status	% Planned in HFTD for 2028	% HFRA planned in 2028	% Risk Reduction for 2028	Three-Year Total	Section; Page Number
Grid Design, Operations, and Maintenance	Qualitative	Proactive Animal Abatement Feasibility Study - Transmission (GH-13)	n/a	n/a	Started; March 2026	n/a	n/a	n/a	In Progress; 2027	n/a	n/a	n/a	Completed; December 31, 2028	n/a	n/a	n/a	n/a	8.2.13.1; p. 229
Grid Design, Operations, and Maintenance	Quantitative	Open Tag Reduction - Distribution Backlog (GM-03)	GM-03	Distribution EC Tags	Close 134% of the count of EC notifications created in HFTD/HFRA in 2025	100%	99%	0.6%	Close 153% of the count of EC notifications created in HFTD/HFRA from 2025 to 2026	100%	99%	0.6%	Close 160% of the count of EC notifications created in HFTD/HFRA from 2025 to 2027	100%	99%	0.6%	n/a	8.6.2; p. 324
Grid Design, Operations, and Maintenance	Qualitative	Updates on EPSS Reliability Study (GM-07)	GM-07	n/a	Completed; February 15, 2026	n/a	n/a	n/a	Completed; February 15, 2027	n/a	n/a	n/a	Completed; February 15, 2028	n/a	n/a	n/a	n/a	8.7.1.1; p. 335
Grid Design, Operations, and Maintenance	Quantitative	Service Breakaway Connectors (GM-14)	n/a	Service Breakaway Connectors	200	100%	100%	0.001%	1,400	100%	100%	0.007%	1,400	100%	100%	0.007%	3,000	8.2.10.6; p. 226
Grid Design, Operations, and Maintenance	Qualitative	Workforce Planning (GM-15)	n/a	n/a	Completed; May 1, 2026	n/a	n/a	n/a	Completed; May 1, 2027	n/a	n/a	n/a	Completed; May 1, 2028	n/a	n/a	n/a	n/a	8.8.1; p. 353

(a) In response to Critical Issue RN-PGE-26-06, the percent of risk reduction for detailed inspections and aerial inspections together account for 57% Eyes on Risk (EOR). PG&E aims to achieve a cumulative 57% EOR across aerial scan and detailed inspections. This EOR can be allocated in any way across the two inspections.

(b) PG&E may include in these calculations the mileage and risk reduction from new system hardening technologies, such as Ground Level Distribution Systems (GLDS) discussed in ACI PG&E 25U 03, Section 2.3.

(c) In the 2023-2025 WMP, PG&E provided a forecast of 440 undergrounding miles for 2026 (PG&E's 2023-2025 Base WMP R6, p. 408, Table 8.1.2-2). The 2026 miles were provided as a forecast only to align to the total miles approved in PG&E's 2023 GRC and were not a WMP target. Based on the undergrounding work completed in 2023 and 2024, and forecast for 2025, we are reducing the number of undergrounding miles needed to achieve the 18% risk reduction target for 2023-2026 that is a requirement of PG&E's 2023 GRC decision (Decision (D.) 23-11-069, Ordering Paragraph 22).

(d) In the 2023-2025 WMP, the covered conductor initiative (GH-01) included work associated with the system hardening program, including overhead covered conductor, system hardening undergrounding, and removal of overhead lines in HFTD, HFRA, or buffer zone areas. The covered conductor activity and target GH 12 have been updated for this revised 2026-2028 Base WMP to remove undergrounding work, which is captured in GH-04, and to remove line removal which is captured in GH 14 for line removal enabled by remote grid.

(e) In response to Critical Issue RN-PGE-26-05, these targets and risk reduction estimates exclude system hardening for community rebuild purposes.

Critical Issue RN-PGE-26-05

Critical Issue Title: *Rebuild program miles are combined into undergrounding and overhead hardening targets.*

Required Remedies:

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.

Remedy Response:

Table 8-1 contains PG&E's revised targets for our GH-04 and GH-12 initiatives. Our revised mileage targets exclude the assumed forecast of community rebuild work known at the time of 2026 – 2028 Base WMP filing on April 4, 2025.

Table PG&E-RN-PGE-26-05-01 shows adjustments we have made to our original GH-04 targets in order to remove the assumed community rebuild miles.

TABLE PG&E-RN-PGE-26-05-01:
ORIGINAL AND REVISED GH-04 TARGETS

	2026	2027	2028	2026-2028 Total
Original WMP Targets: GH-04	**370**	**307**	**400**	**1,077**
Adjustment: remove community rebuild UG	-10	0	0	-10
Revised WMP Targets: GH-04	**360**	**307**	**400**	**1,067**

PG&E has an obligation to reconnect service after a wildfire and to design rebuilt infrastructure in a HFTD area per our hardening standards. Targets excluding known fire rebuild would thus present an incomplete picture of our hardening program, and would be inconsistent with our GRC SHAR (System Hardening Accountability Report) reporting to-date, our GRC funding mechanism (the Wildfire Mitigation Balancing Account), the 2026 workplan, and mitigation selection in 2027 and future years. Additionally, targets should represent both rebuild and non-rebuild work because they rely on the same resources to execute the work. Thus, should emergent fire rebuild work materialize, program resources would need to prioritize the fire rebuild work and those miles should count towards target achievement for our hardening program. If emergent fires require rebuild work, PG&E would leverage the system-hardening decision tree as shown in Figures PG&E-8.2.1-1, Figures PG&E-8.2.1-2, and Figure PG&E-8.2.1-3 in selecting the appropriate mitigation for that rebuild work. Any resulting rebuild miles would count towards their relevant mitigation targets (i.e., GH-12, GH-04, GH-14).

Recognizing Energy Safety's interest in differentiating between non-rebuild system hardening work and fire rebuild work in a HFTD or HFRA, below we provide the breakdown of our undergrounding and overhead mileage targets, including fire rebuild miles known as of July 9, 2025 in Tables PG&E-RN-PGE-26-04-02 and PG&E-RN-PGE-26-05-03, respectively. If requested by Energy Safety, PG&E can provide this breakdown in future WMP reporting.

TABLE PG&E-RN-PGE-26-05-02:
GH-04 TARGET BREAKDOWN

	2026	2027	2028	2026-2028 Total
Revised WMP Targets: GH-04	**360**	**307**	**400**	**1,067**
Known Fire Rebuild UG	2	7	0	9
Planned UG (non-rebuild)	358	300	400	1,058

Table PG&E-RN-PGE-26-04-02 shows adjustments we made to our original GH-12 targets. In compliance with both Critical Issues RN-PGE-26-04 and RN-PGE-26-05, we removed line removal miles enabled by remote grid, which includes mileage for both fire rebuild and non-fire rebuild remote grid projects. See Critical Issue RN-PGE-26-04 for further explanation on these line removal adjustments.

As shown in Table PG&E-RN-PGE-26-05-03 below, the detailed breakdown of our overhead hardening mileage includes fire rebuild miles known as of July 9, 2025.

TABLE PG&E-RN-PGE-26-05-03:
GH-12 TARGET BREAKDOWN

	2026	2027	2028	2026-2028 Total
Revised WMP Targets: GH-12	**294**	**190**	**190**	**674**
Known Fire Rebuild OH	0	1	0	1
Planned OH (non-rebuild)	294	189	190	673

Critical Issue RN-PGE-26-06

Critical Issue Title: *No target and lack of detail for aerial scan inspections used to supplement detailed distribution inspections.*

Required Remedies:

PG&E must set targets for aerial scan inspections for 2026, 2027, and 2028, in accordance with the requirements for targets set forth in 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.

Remedy Response:

In response to Critical Issue RN-PGE-26-06, PG&E split the existing target, AI-07, into two new targets: (1) Aerial Scan Inspections – Distribution (AI-07A); and (2) Detailed Inspections – Distribution (AI-07D).[13] The combined risk reduction for both targets AI-07A and AI-07D adds up to 57% eyes-on-risk each year in 2026, 2027 and 2028.

Please see Section 8.3.8 (Distribution – Detailed Inspection Program) for a full explanation of aerial scan inspections and detailed inspections.

Aerial Scan Inspections – Distribution (AI-07A) Target Description:

We will complete aerial scan inspections on distribution poles, which will be identified in PG&E's asset registry at the time of work plan development. Please note that aerial scan inspections supplement detailed HFTD/HFRA inspections such that every structure classified as extreme or severe receives either a scan or detailed inspection annually, and high structures receive either a scan or detailed inspection every other year. Additional structures of any risk or consequence category may be added to achieve eyes on risk targets.

Please also note that this projected target may require modification based on changes in the asset registry.

Detailed Inspections – Distribution (AI-07D) Target Description:

We will complete detailed inspections on distribution poles, which will be identified in PG&E's asset registry at the time of work plan development. Inspections may be completed by either ground or aerial methods. Target numbers are higher (300,000)

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[13] PG&E's QA/QC program will embed the Aerial Scan Inspections program into the existing targets, Asset Inspections Distribution Quality Assurance (GM-01D) and Asset Inspections Distribution Quality Control (GM-09D). There will be no new QA/QC target created, however QA/QC will be examining both AI-07D and AI-07A as a single population.

than initially shown in PG&E's WMP R0 submission (218,441) since the initial submission was based on assuming approximately one-third of the HFTD/HFRA locations would be inspected each year. However, the Revision Notice Response is based on more detailed inspection planning that takes place mid-year and represents a more accurate forecast. In building a work plan for 2026, PG&E projects a higher number of structures will require inspection in 2026 and 2027 to meet WMP or General Order 165 cycles in addition to driving inspection and maintenance efficiencies. Specific target numbers will be developed for each year based on the latest asset registry during PG&E's internal work planning process.

Please note that this projected target may require modification based on changes in the asset registry.

TABLE 8-2:
ASSET INSPECTION FREQUENCY, METHOD, CRITERIA, AND QUARTERLY TARGETS

Type	Inspection Activity (Program)	Frequency or Trigger (Note 1)	Method of Inspection (Note 2)	Governing Standards and Operating Procedures[b]	Cumulative Quarterly Target 2026, Q1[c]	Cumulative Quarterly Target 2026, Q2	Cumulative Quarterly Target 2026, Q3	Cumulative Quarterly Target 2026, Q4	Cumulative Quarterly Target 2027, Q1	Cumulative Quarterly Target 2027, Q2	Cumulative Quarterly Target 2027, Q3	Cumulative Quarterly Target 2027, Q4	Cumulative Quarterly Target 2028, Q1	Cumulative Quarterly Target 2028, Q2	Cumulative Quarterly Target 2028, Q3	Cumulative Quarterly Target 2028, Q4	% of HFRA and HFTD Covered Annually by Inspection Type	Condition Find Rate Level 1	Condition Find Rate Level 2	Condition Find Rate Level 3
Transmission	Detailed (AI-04)	3 years or WTRM	Drone, aerial lift, or ground visual	GO 165, TD 8123P 100, TD 1001M	-	13,200	22,000	22,000	-	13,200	22,000	22,000	-	13,200	22,000	22,000	40%	0.20%	19.20%	14.7% (Asset)
Transmission	Infrared[a] (AI-06)	3 years or WTRM	Helicopter, drone, or a handheld sensor	GO 165, TD8123P100, TD 1001M, TD1001P14	-	500	1,500	2,500	-	500	1,500	2,500	-	500	1,500	2,500	40%	0.02%	0.15%	N/A (Circuit Mile)
Distribution	Aerial Scan[d] (AI-07A)	100% over 3-year cycle	Visual by aerial	GO 165, TD-2305M	-	30,000	50,000	50,000	-	12,000	20,000	20,000	-	12,000	20,000	20,000	5%	0.12%	0.66%	0.00%
Distribution	Detailed[e][f] (AI-07D)	100% over 3-year cycle	Visual by ground or aerial	TD-2305M-JA02, TD-2305P-03, TD-8123P-201	-	90,000	190,000	300,000	-	90,000	190,000	305,000	-	60,000	160,000	215,000	42%	0.15%	15.96%	0.95%

(a) Lines historically loaded below 40 percent may not be included for inspection due to low efficacy of method at low loading.

(b) Governing standards are available in Appendix E. Operating Procedures are available at: PG&E's Community Wildfire Safety Program.

(c) Even though inspections typically commence in Q1, our main focus is on updates to inspection criteria based on learnings from the previous year, inspector training, and responding to the numerous winter storms that are typical across the service area. To enable a flexible response to changing conditions, we have not set an inspection target for Q1. Our overall target for each year remains unimpacted.

(d) In response to Critical Issue RN-PGE-26-06, Aerial Scan (AI-07A) target was created. The target units together with Detailed Inspections - Distribution (AI-07D) aim to achieve a cumulative 57% EOR.

(e) Historical find rates are from detailed ground inspections only.

(f) In response to Critical Issue RN-PGE-26-06, Detailed inspections and aerial inspections targets together account for 57% Eyes on Risk (EOR). PG&E aims to achieve a cumulative 57% EOR across aerial scan and detailed inspections. This EOR can be allocated in any way across the two inspections.

Critical Issue RN-PGE-26-07

Critical Issue Title: *No target for transmission switch function tests.*

Required Remedies:

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.

Remedy Response:

In response to Critical Issue RN-PGE-26-07, PG&E is not planning to conduct switch function tests for the 2026-2028 period in HFTD/HFRA locations for the reasons explained below. However, please note that PG&E will be conducting switch function testing in non-HFTD/non-HFRA locations during this period.

- PG&E's Transmission Function Test Program is conducted in 8-year cycles. The current cycle began in 2021 and will end in 2028. High fire consequence switches in the current cycle (including HFTD and HFRA) were prioritized for testing. We are on track to complete testing on this subset of switches by the end of 2025; therefore, there will be no remaining switches to test in the HFTD/HFRA during the current 8-year cycle. After 2025, the remaining 2021-2028 scope will focus on switches that are not in HFTD or HFRA locations. Our 8-year cycle length was developed through benchmarking against other utilities (whose inspection cycles range from 6 to 10 years) and feedback from our internal execution teams. See Table PGE-RN-PGE-26-07-01, which depicts the distribution of inspection program targets in the service area.

- Function tests are not yet suitable for annual targets due to their associated execution risks, described in Section 8.3.5.3 of the Base 2026-2028 WMP. We are looking into new non-intrusive technology and work methods that will eliminate execution risks, allowing us to perform switch function tests at any time without causing outages to substations and customers.

- Transmission line switches have additional controls and mitigations:

    - HFTD/HFRA switches are inspected aerially once every 3 years via routine detailed drone-based inspections[14] and infrared inspections.[15] Table PG&E-RN-PGE-26-07-01 below depicts the find rates of these two routine inspections for the years 2022-2024.

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14 See target AI-04 in Section 8.3.1.1 of PG&E's 2026-2028 WMP.

15 See target AI-06 in Section 8.3.1.1 of PG&E's 2026-2028 WMP.

- There are onsite field controls in place for switch operations:
    - At FPI ratings of R2 and above, switches are operated manual only by a Qualified Electrical Worker (QEW); and
    - At FPI ratings of R3 and above, a Safety & Infrastructure Protection Team (SIPT) is present and prepared to respond to an ignition should one occur.

TABLE PG&E-RN-PGE-26-07-01:
TEST INSPECTION TARGETS

	2021 - 2025	**2026-2028**
Non-HFTD	561	348
HFTD Tier 3, Tier 2, Zone 1, and HFRA	393	0

TABLE PG&E-RN-PGE-26-07-02:
INSPECTION PROGRAM FIND RATES

Inspection Activity (Program)	**Frequency or Trigger**	**Condition Find Rate Level 1**	**Condition Find Rate Level 2**	**Condition Find Rate Level 3**
Switch Function Tests	8 years	0.6%	17%	0.5%
Detailed (AI-04) and Infrared (AI-06)	3 years or WTRM	0.6%	29.7%	1.5%

Critical Issue RN-PGE-26-08

Critical Issue Title: *Vegetation management qualitative targets are not specific or measurable.*

Required Remedies:

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

Remedy Response:

Wood Management Benchmarking target (VM-23) describes how PG&E will conduct benchmarking with peer utilities for wood management to identify best practices.

PG&E initiated a wood management benchmarking discussion with Southern California Edison (SCE) and San Diego Gas & Electric (SDG&E) in 2023 as a singular occurrence. However, per Energy Safety's Area of Continuous Improvement (ACI) PG&E-23B-16 (Updating the Wood Management Procedure), PG&E intends to facilitate further discussions with partner IOUs and Liberty Utilities to gain additional insights on wood management best practices in the spirit of continuous improvement. To make this target more specific and measurable, PG&E will conduct benchmarking as shown in the following target timeline below in Table PG&E-RN-PGE-26-08-01:

TABLE PG&E-RN-PGE-26-08-01:
WOOD MANAGEMENT BENCHMARKING TARGET (VM-23) TIMELINE AND MILESTONES

Activity #	Phase	Activity	Start Date	End Date
1	Develop and Implement	Identify peer utility points of contact for Wood Management benchmarking.	1/1/2026	6/30/2026
2	Develop and Implement	Facilitate kickoff call, share points of interest, and align with each peer utility on benchmark direction.	7/1/2026	9/30/2026
3	Develop and Implement	Draft and finalize questions for benchmark survey and distribute to participants.	10/1/2026	12/31/2026
4	Develop and Implement	Collect peer utility Benchmark surveys.	1/1/2027	3/31/2027
5	Review Results	Process responses and identify common themes and potential best practices; share results with other utilities.	4/1/2027	6/30/2027
6	Review Results	Complete discussions with other utilities regarding potential agreement on best practices that may be collectively implemented, if any.	7/1/2027	9/30/2027
7	Practice Adoption	Complete implementation of any relevant updates to PG&E procedure, if applicable.	10/1/2027	9/30/2028

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

To support workforce improvements and retention, and to make this target more specific and measurable, PG&E proposes the following milestones for Recruitment, Retention, and Training below in Table PG&E-RN-PGE-26-08-02:

TABLE PG&E-RN-PGE-26-08-02:
WORKFORCE PLANNING – VEGETATION MANAGEMENT TARGET (VM-24) TIMELINE AND MILESTONES

Activity #	Target Category	Target	Start Date	End Date
1	Recruitment	Provide $1,500,000 of funding towards Community College scholarships towards recruitment of individuals who are looking to pursue a VM career path through the Community College VM programs.	01/01/2026	12/31/2027
2	Retention	Provide $10,000 funding annually to support retention by paying for the following VM-related certifications and memberships such as: Arborist Certification TRAQ (Tree Risk Assessment Qualified) Certification CTSP (Certified Tree Safety Professional) Certification ISA (International Society of Arboriculture) Membership UAA (Utility Arborist Association) Membership	Annual Cycles: 01/01/2026 – 12/31/2026 01/01/2027 – 12/31/2027 01/01/2028 – 12/31/2028	
3	Training	Complete annual audit of completion of One VM Training and Basic Curriculum courses for VMI Personnel	Annual Cycles: 01/01/2026 – 12/31/2026 01/01/2027 – 12/31/2027 01/01/2028 – 12/31/2028	

Integrated Vegetation Management Benchmarking target (VM-25) describes how PG&E will conduct benchmarking with peer utilities on Integrated Vegetation Management to identify best practices.

To make this target more specific and measurable, the benchmarking will follow a three-phase process: (1) develop and implement; (2) review results; and (3) practice adoption.

The target timeline for this work will be as shown below in Table PG&E-RN-PGE-26-08-03:

TABLE PG&E-RN-PGE-26-08-03:
INTEGRATED VEGETATION MANAGEMENT BENCHMARKING TARGET (VM-25) TIMELINE AND MILESTONES

Activity #	Phase	Activity	Start	Due Date
1	Develop and Implement	Identify peer utility points of contact for Integrated Vegetation Management benchmarking.	1/1/2026	6/30/2026
2	Develop and Implement	Facilitate kickoff call, share points of interest, and align with each peer utility on benchmark direction.	7/1/2026	9/30/2026
3	Develop and Implement	Draft and finalize questions for benchmark survey and distribute to participants.	10/1/2026	12/31/2026
4	Develop and Implement	Collect peer utility Benchmark surveys.	1/1/2027	3/31/2027
5	Review Results	Process responses and identify common themes and potential best practices; share results with other utilities.	4/1/2027	6/30/2027
6	Review Results	Complete discussions with other utilities regarding potential agreement on best practices that may be collectively implemented, if any.	7/1/2027	9/30/2027
7	Practice Adoption	Complete implementation of any relevant updates to PG&E procedure, if applicable.	1/5/2028	12/31/2028

VM critical data sets data quality remediation (Vegetation Management) target (ES-01) describes how PG&E will improve VM data through proactive identification of data quality (DQ) issues, and the development and execution of data quality mitigation plans.

Vegetation Management will support the following targets to meet our stated goals. Using the Manage/Maintain/Mitigate framework, we will monitor progress using the specific and measurable timeline as shown below in Table PG&E-RN-PGE-26-08-04:[16]

16 If approved by Energy Safety, PG&E will add detailed milestones to the final 2026-2028 WMP.

TABLE PG&E-RN-PGE-26-08-04:
VM CRITICAL DATASETS DATA QUALITY REMEDIATION (VEGETATION MANAGEMENT) TARGET (ES-01) TIMELINE AND MILESTONES

Focus Area	Target	Start	Due Date
Manage critical datasets	Achieve active management of the 4 highest-prioritized critical datasets.	1/1/2026	12/31/2026
Maintain critical datasets	Enable monitoring of 4 managed critical datasets.	1/1/2026	12/31/2026
Mitigate data quality issues	Develop annual report of identified DQ issue remediations.	1/1/2026	12/31/2026
Manage critical datasets	Achieve active management of additional 6 highest prioritized critical datasets (10 cumulative total).	1/1/2027	12/31/2027
Maintain critical datasets	Enable monitoring of 10 managed critical datasets.	1/1/2027	12/31/2027
Mitigate data quality issues	Develop annual report of identified DQ issue remediations.	1/1/2027	12/31/2027
Manage critical datasets	Achieve active management of additional 8 highest prioritized critical datasets (18 cumulative total).	1/1/2028	12/31/2028
Maintain critical datasets	Enable monitoring of 18 managed critical datasets.	1/1/2028	12/31/2028
Mitigate data quality issues	Develop annual report of identified DQ issue remediations.	1/1/2028	12/31/2028

Critical Issue RN-PGE-26-09

Critical Issue Title: *No plan for incorporating TRI and FTI into routine patrols.*

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:

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.*

Remedy Response:

PG&E provides the following information in response to the four subparts of Critical Issue RN-PGE-26-09.

1. Process and Criteria for Incorporating TRI and FTI into Distribution Routine Patrol

The consolidation of Vegetation Management programs was initiated to address the feedback provided in Energy Safety's Area of Continuous Improvement (ACI) PG&E-23B-17 (Consolidation of Vegetation Inspection Programs), which was issued in Energy Safety's Final Decision on PG&E's 2023-2025 WMP. ACI PG&E-23B-17 directed PG&E to, among other things, present a plan to consolidate its vegetation inspection programs, reduce customer touchpoints, and streamline procedures.[17]

a. Incorporating the TRI Program into Distribution Routine Patrol

The outcomes of the TRI program will remain the same as they are incorporated into the Distribution Routine Patrol program. The work down of the TRI tree population—as previously identified through the Enhanced Vegetation Management program and described as the TRI program in 2023-2025 WMP—will continue in 2026-2028. In the proposed consolidated program structure, the process of TRI inspection will occur during the distribution routine programs instead of a separate independent inspection. PG&E will be able to continue to provide reporting on TRI units mitigated, to facilitate tracking of the work down of the TRI population.

b. Incorporating the FTI Program into Distribution Routine Patrol

The intended outcome of the FTI program (to address vegetation in high-risk areas that have experienced higher volumes of vegetation damage during PSPS events, outages, and/or ignitions) will remain the same as FTI is incorporated into the distribution routine programs. The areas of high risk that were introduced in the proposed 2026-2028 WMP in the 5x5 Risk Matrix will continue to identify locations of high wildfire risk and consequence.

Elevated inspections in those identified high-risk areas, such as what was previously performed in FTI, will continue through the Distribution Routine and Distribution Hazard Patrol programs. PG&E continues to evaluate incorporating aspect(s) of the FTI scope into the Distribution Routine program and will provide an update as the studies evolve.

2. Process and Criteria for Incorporating TRI and FTI Data Fields into Distribution Routine Patrol

PG&E will leverage an iterative process for determining which unique data fields will be incorporated into its Distribution Routine Patrol Program inspection process, including data fields from the TRI and FTI programs. Each data field will be evaluated for relevance from a data management, operational, and risk mitigation perspective.

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17 Energy Safety Final Decision on PG&E's 2023-2025 WMP (Dec. 29, 2023) at 110-11.

Considerations will be made for adjusting and/or adding data fields based on potential to impact vegetation-caused outages and ignitions.

The first phase of evaluation will consolidate the data fields collected across the 2023-2026 inspection programs, including Distribution Routine inspections (Level 1 and Level 2 inspections), FTI (Tree Risk Assessment form), and Distribution Second Patrol. Key data fields will be evaluated from three perspectives:

1. *Data management*: Data that is applicable to the individual vegetation point (i.e., GPS location, species, span);

2. *Operational*: Data that informs operational planning or execution (i.e., constraints, scheduling); and

3. *Risk mitigation*: Data that may be a factor in determining outage or ignition risk (i.e., species, HFTD, etc.).

Data fields that are deemed important for data collection will be included as part of the inspection data collection in the Distribution Routine Patrol program. Depending on operational considerations, data collection may also be included as part of the Distribution Hazard Patrol program.

For FTI, the unique data fields that are being considered for inclusion through Distribution Routine Patrols are questions associated with the Tree Risk Assessment (TRA) form. The TRA form is currently required in FTI as part of the 2023-2025 WMP program, but not in Distribution Routine Patrol. While the TRA form is an industry standard form, it is not utility-specific and is intended to be a template to be adjusted as needed. PG&E is in the process of reviewing the fields from the TRA form and determining if each field is either duplicative, administrative, or uncorrelated to the assessment of the tree. This review and assessment will enable PG&E to tailor the TRA form to be abbreviated and PG&E-specific, in alignment with the feedback provided through Energy Safety's ACI PG&E-25U-07 (Vegetation Management Recordkeeping), which recommended that PG&E adapt the ISA's Basic Tree Risk Assessment form.

While the Distribution Routine Patrol Program tracks inspections relative to the span, in the proposed future-state, PG&E will continue to collect individual tree records associated with the inspection and prescriptions when inspecting in specified high-risk areas. PG&E is exploring how the Distribution Routine Patrols could be augmented or supplemented by capturing the record of inspections through remote sensing-assisted tools such a backpack imaging system that captures LiDAR.

3. Timeline for Program Consolidation

Implementation of program consolidation will impact several facets of VM Distribution patrols spanning operational processes and/or procedures, data capture and One VM development, and workforce change management. The transition towards program consolidation can be separated into four phases:

- Phase 1: Data Gathering and Analysis – PG&E will collect and analyze data to inform the scope of the Distribution Routine Patrol inspections. Data collection will include remote sensing technologies, such as LiDAR and satellite, as well as a consolidation of data collected via the 2023-2026 WMP VM Distribution programs (i.e., Distribution Routine, Distribution Second Patrol, FTI, TRI). Analyses will be conducted to evaluate relevancy and value of data inputs from a data management, operational, and risk mitigation perspective.

- Phase 2: Scope Definition – Outputs of the data analyses from both the remote sensing data and/or the VM program data will be consolidated as part of the program inspection scope. Finalization of inspection data collection, including methodology of data acquisition, will be determined. Allocation of data collection fields will be made to the Distribution Routine Patrol and Distribution Hazard Patrol programs.

- Phase 3: Technology Development and Change Management – Upon finalization of the program consolidation scope, any process and technology updates will be made to procedures, guidance documents, and training materials, as appropriate. Updates to One VM will also be implemented to align to the consolidated program scope.

- Phase 4: Continuous Improvement – As PG&E collects more information and evolves its analyses, additional changes may be implemented to the inspection programs. Correspondingly, additional changes may be implemented to improve the efficacy of the program, which may include changes to the data being collected, adjustments to incorporate more remote sensing technologies, and One VM improvements for usability and efficiency.

A timeline, defined below in Table PG&E-RN-PGE-26-09-01, has been developed to provide better visibility on the milestones for program consolidation.[18]

PG&E will operationalize its distribution program consolidation on or by December 31, 2025. The timeline and milestones for consolidation are not included in Table 9-1 as qualitative targets because they will be met in 2025.

[18] Please note that PG&E expects the milestones to shift due to the significant management of change required to implement program consolidation activities, which may occur in phases. Although milestones may shift, we will still meet our 12/31/2025, or sooner, operationalized date.

TABLE PG&E-RN-PGE-26-09-01:
PROGRAM CONSOLIDATION TIMELINE AND MILESTONES

Activity #	Phase	Activity	Start	Due Date
1	Data Gathering and Analysis	Data assessment	08/01/2025	8/30/2025
2	Data Gathering and Analysis	Perform remote sensing technology evaluation	08/01/2025	10/15/2025
3	Scope Definition	Define Distribution Routine Patrol program scope	08/01/2025	10/30/2025
4	Technology Development and Change Management	Develop 2026 workplan	10/15/2025	11/15/2025
5	Technology Development and Change Management	Implement One VM technology enhancement(s)	08/01/2025	12/15/2025
6	Technology Development and Change Management	Update Distribution Routine Patrol procedure(s), as required	11/01/2025	12/15/2025
7	Technology Development and Change Management	Conduct training(s) on updated procedures and/or One VM changes	11/15/2025	12/31/2025
8	Technology Development and Change Management	Update One VM technical documentation	08/01/2025	12/31/2025
9	Continuous Improvement	Iteratively update Distribution Routine Patrol program scope, if applicable	1/1 annually, if applicable	12/31 annually, if applicable

TABLE 9-1:
VEGETATION MANAGEMENT TARGETS BY YEAR (NON-INSPECTION TARGETS)

Initiative	Quantitative or Qualitative	Activity (Tracking ID)	Previous Tracking ID, if applicable	Target Unit	2026 Target / Status	% Risk Reduction for 2026	2027 Target / Status	% Risk Reduction for 2027	2028 Target / Status	% Risk Reduction for 2028	Three-Year Total	Section; Page Number
Vegetation Management and Inspections	Qualitative	Wood Management Benchmarking (VM-23)[(a)]	n/a	n/a	Initiate benchmarking with peer utilities.	n/a	Gather benchmarking survey responses and facilitate discussions regarding potential alignment on best practices.	n/a	Complete implementation of any relevant updates to PG&E procedure, if applicable.	n/a	n/a	9.5; p. 390
Vegetation Management and Inspections	Qualitative	Workforce Planning - Vegetation Management (VM-24)[(a)]	n/a	n/a	Provide funding towards Community College towards recruitment of individuals looking to pursue a VM career path, provide funding for VM-related certifications and memberships, complete annual audit of the completion of VM Training courses.	n/a	Provide funding towards Community College towards recruitment of individuals looking to pursue a VM career path, provide funding for VM-related certifications and memberships, complete annual audit of the completion of VM Training courses.	n/a	Provide funding for VM-related certifications and memberships, complete annual audit of the completion of VM Training courses.	n/a	n/a	9.13; p. 429
Vegetation Management and Inspections	Qualitative	Integrated Vegetation Management Benchmarking (VM-25)[(a)]	VM-15	n/a	Initiate benchmarking with peer utilities.	n/a	Gather benchmarking survey responses and facilitate discussions regarding potential alignment on best practices.	n/a	Complete implementation of any relevant updates to PG&E procedure, if applicable.	n/a	n/a	9.7; p. 394
Vegetation Management and Inspections	Quantitative	Mitigation of Legacy Tree Removal Inventory (TRI) (VM-26)[(b)]	VM-04	Trees	40,000 (Cumulative)	0.94% (Cumulative)	85,000 (Cumulative)	1.99% (Cumulative)	135,000 (Cumulative)	3.16% (Cumulative)	135,000	9.4; p. 388

(a) See Critical Issue RN-PGE-26-08 for additional information.
(b) VM 26 is a cumulative target of 135,000 therefore the 85,000 trees shown in 2027 is inclusive of the 40,000 trees from 2026. The risk reduction shown is cumulative as well.

4. Quantitative Target for Mitigation of Legacy Tree Removal Inventory (TRI) VM- 26

The population of trees identified in the TRI program inventory will continue to be addressed within an eight-year timeline, with three years of that timeline completed through the end of the 2023-2025 WMP.

PG&E reviewed the dataset and current performance and proposes cumulative tracking of targets of 40,000 in 2026, 85,000 in 2027, and 135,000 in 2028. This enables a flexible approach to accelerate the mitigation of the 135,000 trees to the extent possible. As an illustration of the proposed cumulative target methodology, if 2026 concludes with 60,000 units mitigated, 2027 would require an additional 25,000 units mitigated to meet the 2027 cumulative target of 85,000 units.

For purposes of the TRI population addressed between 2026 and 2028, the term "mitigate" is proposed to refer to a tree identified from the legacy EVM program that is either:

1) Removed by the Distribution Routine program;

2) Removed by another PG&E VM program and no longer present;

3) No longer poses a threat to PG&E facilities because the facilities have been relocated; or

4) De-listed through Level 2 inspection review (changed to a work status of "No Work" following a Level 2 inspection).

While the results of ACI PG&E-25U-08 (Reinspection of Trees in the Tree Removal Inventory) are still under review and validation, the initial review of preliminary results support the expansion of the term "mitigate" to include units delisted after a Level 2 inspection is performed if tree is deemed to not pose a hazard to overhead electric facilities.

Critical Issue RN-PGE-26-10

Critical Issue Title: *Pole clearing targets do not follow WMP Guideline requirements.*

Required Remedies:

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.

Remedy Response:

In response to Critical Issue RN-PGE-26-10, PG&E has separated the existing target, VM-02, into two new targets for the years 2026 through 2028. Pole Clearing Program - Compliance target (VM-02C) and Pole Clearing Program - Risk Reduction target (VM-02R). These pole clearing targets are described in the table below.

The pole clearing program compliance target (VM-02C) was developed based on the compliance requirements as outlined here and described further in WMP Section 9.4. Per 14 California Code of Regulations (CCR) Section 1252, Public Resources Code (PRC) Section 4292 applies to any mountainous land, forest-covered land, brush-covered land or grass-covered land within State Responsibility Areas, unless specifically exempted by 14 CCR 1255 and 1257. PRC 4292 has also been adopted by Region 5 of the United States Forest Service (USFS). PRC 4292 mandates pole clearing requirements for poles or towers that support a switch, fuse, transformer, lightning arrester, line junction, or dead end or corner poles, unless otherwise exempted by 14 CCR Section 1255.

The pole clearing program risk reduction target (VM-02R) is outlined here and further described in WMP Section 9.4. PG&E has adopted (with exceptions) PRC Section 4292 clearing requirements in High Fire-Threat Districts (HFTDs) and High Fire Risk Areas (HFRAs). These additional areas include but are not limited to Local Responsibility Areas within HFTDs, HFRAs, and other non-USFS Federal Responsibility Areas. These additions are based on PG&E guidance (e.g., risk reduction work) or through local agreements with exceptions as described in TD-7112S R3.[19] The additional locations are intended to reduce wildfire risk, improve access to equipment, allow for safe Supervisory Control and Data Acquisition (SCADA) operations, enhance public safety, compliment other mitigations, and protect assets from wildfires regardless of cause at equipment locations.

The designated population for the pole clearing program will be identified in PG&E's asset registry at the time of work plan development. Please also note that this projected target may require modification based on changes in the asset registry.

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19 The supporting document is available at: PG&E's Community Wildfire Safety Program.

TABLE 9-2:
VEGETATION INSPECTIONS AND POLE CLEARING BY YEAR

Activity (Program)	Tracking ID	Previous Tracking ID, if applicable	Target Unit	Cumulative (Cml.) Quarterly Target 2026, Q1	Cml. Quarterly Target 2026, Q2	Cml. Quarterly Target 2026, Q3	Cml. Quarterly Target 2026, Q4	Cml. Quarterly Target 2027, Q1	Cml. Quarterly Target 2027, Q2	Cml. Quarterly Target 2027, Q3	Cml. Quarterly Target 2027, Q4	Cml. Quarterly Target 2028, Q1	Cml. Quarterly Target 2028, Q2	Cml. Quarterly Target 2028, Q3	Cml. Quarterly Target 2028, Q4	% HFTD Covered in 2026[d]	% Risk Reduction for 2026	% Risk Reduction for 2027[a]	% Risk Reduction for 2028[a]	Three-Year Total	Activity Timeline Target	Section; Page Number
Pole Clearing Program - Compliance[b]	VM-02C	VM-02	Poles[c]	13,668	30,958	45,710	45,710	13,668	30,958	45,710	45,710	13,668	30,958	45,710	45,710	4%	0.06%	0.06%	0.06%	137,130	365 days	9.4; p. 388
Pole Clearing Program - Risk Reduction[b]	VM-02R	VM-02	Poles[c]	6,820	16,445	24,290	24,290	6,820	16,445	24,290	24,290	6,820	16,445	24,290	24,290	4%	0.04%	0.04%	0.04%	72,870	365 days	9.4; p. 388
Substation Inspections - Distribution	VM-05	VM-05	Distribution Substations	58	122	130	130	58	122	130	130	58	122	130	130	100%	53% (Eyes on Risk)	53% (Eyes on Risk)	53% (Eyes on Risk)	390	274 days	9.6; p. 392
Substation Inspections – Transmission	VM-06	VM-06	Transmission Substations	-	53	55	55	-	53	55	55	-	53	55	55	100%	23% (Eyes on Risk)	23% (Eyes on Risk)	23% (Eyes on Risk)	165	274 days	9.6; p. 392
Substation Inspections – Power Generation	VM-07	VM-07	Power Generation Switchyards and Powerhouses	-	52	58	58	-	52	58	58	-	52	58	58	100%	24% (Eyes on Risk)	24% (Eyes on Risk)	24% (Eyes on Risk)	174	274 days	9.6; p. 392
Routine Transmission – Ground	VM-13	VM-13	Circuit Miles	1,989	10,000	15,000	17,500	1,925	10,000	15,000	17,500	1,925	10,000	15,000	17,500	100%	100% (Eyes on Risk)	100% (Eyes on Risk)	100% (Eyes on Risk)	52,500	365 days	9.2.3; p. 378
Transmission Hazard Patrol (Second Patrol, Tree Mortality)	VM-14	VM-14	Circuit Miles	-	-	-	5,625	-	-	-	5,625	-	-	-	5,625	100%	100% (Eyes on Risk)	100% (Eyes on Risk)	100% (Eyes on Risk)	16,875	365 days	9.2.4; p.383
Distribution Routine Patrol	VM-16	VM-16	Circuit Miles	11,500	31,500	50,500	78,200	11,500	31,000	50,000	77,800	11,000	31,000	50,000	77,500	100%	0.82%	0.82%	0.82%	233,500	365 days	9.2.1; p. 369
Distribution Hazard Patrol (Second Patrol, Tree Mortality)	VM-17	VM-17	Circuit Miles	1,500	4,000	6,500	10,000	1,500	4,000	6,500	10,000	1,500	4,000	6,500	10,000	39%	75.14% (Eyes on Risk)	75.14% (Eyes on Risk)	75.14% (Eyes on Risk)	30,000	365 days	9.2.2; p. 374

(a) Estimates for the 2027 & 2028 risk reduction are not available at the time of WMP submission. As such, 2026 risk reduction values will be used as a proxy.

(b) Pole Clearing Program (VM 02) is separated into Pole Clearing Program-Compliance (VM 02C) and Pole Clearing Program - Risk Reduction (VM 02R) in response to Critical Issue RN-PGE-26-10.

(c) Poles are defined in this target as distribution and transmission poles and structures.

(d) Values have been updated as a result of Substantive Errata filing on April 18, 2025, in accordance with Revision Notice at 21. Note that the values for Pole Clearing Program-Compliance and Pole Clearing Program-Risk Reduction have since been updated in response to Critical Issue RN-PGE-26-10.

Critical Issue RN-PGE-26-11

Critical Issue Title: *Integrated Vegetation Management rights-of-way reassessment timescales are unclear.*

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.*

Remedy Response:

PG&E provides the following information in response to the two subparts of Critical Issue RN-PGE-26-11.

1. Cadence for Integrated Vegetation Management

   For Integrated Vegetation Management (IVM), the cadence for rights-of-way assessment/reassessment, targeted cadence for maintenance work, and cadence for work in support of developing IVM workplans (e.g., LiDAR data analysis) are as follows:

   - *Rights-of-way assessment/re-assessment*: PG&E annually assesses rights-of-way using LiDAR data and other inputs to support the development of the following year's work plan for Transmission IVM.

   - *Maintenance work and work in support of IVM*: Findings from the annual rights-of-way assessments are typically targeted for maintenance within a two-to-five-year period. The timing of maintenance is tied to an annual work planning process. Annual work planning is a process that includes resource planning, and approval to support execution of various vegetation management programs. For Transmission IVM, the LiDAR analysis and other factors previously described help inform the annual work plan. The overall goal of IVM is to establish a compatible plant community to optimize and extend the maintenance cycles.

2. Definition of Previously-Worked Rights-of-Way

   "Previously-worked rights-of-way" are those areas where significant program- or project-specific vegetation maintenance was performed in a right-of-way to meet NERC FAC-003 requirements or where other right-of-way clearing/widening

occurred typically as part of previous Transmission right-of-way reclamation or right-of-way expansion program efforts. Previously worked rights-of-way also include those that have had ongoing Transmission IVM maintenance.

Critical Issue RN-PGE-26-12

Critical Issue Title: *Vegetation management QA/QC units are inconsistent.*

Required Remedies:

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.

Remedy Response:

In response to Critical Issue RN-PGE-26-12, PG&E revised Table 9-6 to clarify the population and sample units of measure for VM Quality Assurance (QA) and Quality Control (QC).

The population units used in VM QA are miles, and the sample units are also miles. The population used for QA includes *all* miles in HFTD/HFRA, regardless of whether a particular mile has yet been inspected during that inspection cycle.

The population units used in QC are spans (VM-22D and VM-22T) and poles (VM-22P), and the sample units are also spans (VM-22D and VM-22T) and poles (VM-22P), respectively. The population used for QC only includes those spans and poles that have already been inspected by VM during that inspection cycle.

TABLE 9-6:
VEGETATION MANAGEMENT QA AND QC ACTIVITY

Initiative/ Activity Being Audited	Population /Sample Unit	2026: Population Size [(d)]	2026: Sample Size	2026: % of Sample in HFTD/HFRA	2027: Population Size [(d)]	2027: Sample Size	2027: % of Sample in HFTD/HFRA	2028: Population Size [(d)]	2028: Sample Size	2028: % of Sample in HFTD/HFRA	Confidence level / MOE	2026: Pass Rate Target	2027: Pass Rate Target	2028: Pass Rate Target
Vegetation Management Quality Assurance - Distribution Routine (VM-08D)	Miles [(a)]	25,748[(e)]	500	100%	25,748[(e)]	500	100%	25,748[(e)]	500	100%	95/3.25%	97%	97%	97%
Vegetation Management Quality Assurance - Transmission Routine (VM-08T)	Miles [(a)]	5,624[(e)]	200	100%	5,624[(e)]	200	100%	5,624[(e)]	200	100%	95/3.25%	97%	97%	97%
Vegetation Management Quality Control - Distribution Routine (VM-22D)	Spans [(b)]	551,643[(e)]	80,000	100%	551,643[(e)]	80,000	100%	551,643[(e)]	80,000	100%	99/5%	95%	95%	95%
Vegetation Management Quality Control - Pole Clearing (VM-22P) [(c)]	Poles [(b)]	70,000	11,500	100%	70,000	11,500	100%	70,000	11,500	100%	99/5%	95%	95%	95%
Vegetation Management Quality Control - Transmission Routine (VM-22T)	Spans [(b)]	50,669	13,500	100%	50,669	13,500	100%	50,669	13,500	100%	99/5%	95%	95%	95%

(a) Overhead circuit miles in HFTD/HFRA
(b) VMQC Distribution/Transmission/Pole Population is comprised of the overhead span inspected or subject pole locations that have been cleared by VM Operations in HFTD/HFRA.
(c) The VC Pole Clearing Procedure considers both risk and compliance poles as subject; both subsets are incorporated into the sample population. Please see Critical Issue RN-PGE-26-10 for additional information.
(d) Population Size subject to change for 2026 2028 due to construction activities and revisions to fire district/risk area boundaries.
(e) Updated based on Substantive Errata filed on April 18, 2025 in accordance with Energy Safety's issuance of Revision Notice at 21.

PACIFIC GAS AND ELECTRIC COMPANY

2026-2028 WILDFIRE MITIGATION PLAN

APPENDIX A

Appendix A

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
1	DUNBAR 11034882	176.19	0.18	176.01	PSPS	0.00	WDRM v4
2	PUEBLO 1104968601	126.37	6.92	119.45	PSPS	0.01	WDRM v4
3	ARBUCKLE 110130376	97.21	0.16	97.05	PSPS	0.00	WDRM v4
4	VACAVILLE 111112342	82.76	1.44	81.33	PSPS	0.01	WDRM v4
5	BALCH NO 1 1101CB	72.56	72.55	0.00	Wildfire	0.12	WDRM v4
6	CALPINE 1144276-G	47.93	47.93	0.00	Wildfire	0.03	WDRM v4
7	CASTRO VALLEY 1110MR525	39.73	0.46	39.26	PSPS	0.04	WDRM v4
8	MARIPOSA REMOTE 0001CB	33.68	33.68	0.00	Wildfire	0.16	WDRM v4
9	SPAULDING 1101CB	30.92	30.92	0.00	Wildfire	0.04	WDRM v4
10	TIGER CREEK 0201CB	29.47	28.25	1.22	Wildfire	0.42	WDRM v4
11	VACAVILLE 1111772224	29.44	0.80	28.64	PSPS	0.04	WDRM v4
12	CALPINE 1144962	25.88	25.88	0.00	Wildfire	0.04	WDRM v4
13	CORDELIA 111013382	22.36	0.22	22.13	PSPS	0.00	WDRM v4
14	KESWICK 1101CB	20.50	20.43	0.07	Wildfire	0.02	WDRM v4
15	SPRING GAP 1702188426	16.12	16.12	0.00	Wildfire	0.00	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
16	TASSAJARA 21123202	14.62	13.29	1.34	Wildfire	0.41	WDRM v4
17	BALCH NO 1 1101105414	13.08	13.08	0.00	Wildfire	7.45	WDRM v4
18	CLARKSVILLE 210551478	10.91	0.43	10.47	PSPS	0.05	WDRM v4
19	BALCH NO 1 1101406582	10.88	10.88	0.00	Wildfire	3.78	WDRM v4
20	BUCKS CREEK 1102CB	10.09	10.09	0.00	Wildfire	0.03	WDRM v4
21	PEABODY 2106CB	9.95	0.68	9.26	PSPS	0.39	WDRM v4
22	APPLE HILL 1104814656	9.86	9.85	0.02	Wildfire	0.02	WDRM v4
23	SCE TEJON TIE 1101CB	9.80	9.75	0.05	Wildfire	0.06	WDRM v4
24	APPLE HILL 2102CB	8.46	7.81	0.64	Wildfire	0.17	WDRM v4
25	MIWUK 170179118	8.22	1.79	6.43	Wildfire PSPS	0.02	WDRM v4
26	SALT SPRINGS 210110416	7.67	7.51	0.16	Wildfire	1.06	WDRM v4
27	DEL MAR 210938684	7.17	0.24	6.92	PSPS	0.00	WDRM v4
28	OAKLAND J 1102CR102	6.97	0.53	6.45	PSPS	0.32	WDRM v4
29	WILDWOOD 1101384582	6.78	6.78	0.00	Wildfire	4.54	WDRM v4
30	ALLEGHANY 1102WC 1101/2	6.53	6.46	0.08	Wildfire	0.01	WDRM v4
31	CALPINE 1146200-G	5.80	5.80	0.00	Wildfire	0.01	WDRM v4
32	MARIPOSA 2101929360	5.68	5.66	0.02	Wildfire	0.07	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
33	CALPINE 1144304	5.64	5.59	0.05	Wildfire	0.05	WDRM v4
34	MONTICELLO 11011780	5.62	1.25	4.38	Wildfire PSPS	0.07	WDRM v4
35	CEDAR CREEK 1101451856	5.58	5.08	0.51	Wildfire	0.05	WDRM v4
36	WYANDOTTE 11102590	5.48	0.08	5.40	PSPS	0.00	WDRM v4
37	VACAVILLE 1104CB	5.41	0.31	5.10	PSPS	0.44	WDRM v4
38	RINCON 1102228730	5.35	0.06	5.29	PSPS	0.00	WDRM v4
39	ELECTRA 1102CB	5.30	5.25	0.05	Wildfire	2.60	WDRM v4
40	KESWICK 1101417066	5.27	4.80	0.47	Wildfire	2.76	WDRM v4
41	PIT NO 5 1101923612	5.15	5.13	0.02	Wildfire	0.85	WDRM v4
42	NARROWS 2104CB	5.06	5.06	0.00	Wildfire	0.00	WDRM v4
43	FRENCH GULCH 11011892	5.05	5.05	0.00	Wildfire	3.02	WDRM v4
44	MARINA (F) 1101CB	5.03	5.03	0.00	Wildfire	0.00	WDRM v4
45	CALISTOGA 110135588	4.99	4.27	0.72	Wildfire PSPS	2.94	WDRM v4
46	VACAVILLE 1104196294	4.95	0.61	4.34	Wildfire PSPS	0.51	WDRM v4
47	DOBBINS 1101CB	4.84	4.77	0.07	Wildfire	0.75	WDRM v4
48	CLAYTON 221296224	4.68	4.61	0.07	Wildfire	10.24	WDRM v4
49	WEST POINT 1101CB	4.52	4.51	0.01	Wildfire	4.86	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
50	TIGER CREEK 0201320746	4.50	4.50	0.00	Wildfire	3.52	WDRM v4
51	TRIDAM POWERHOUSE 2101CB	4.48	4.48	0.00	Wildfire	0.05	WDRM v4
52	ELECTRA 110213414	4.43	0.70	3.74	Wildfire PSPS	0.00	WDRM v4
53	CALPINE 1146394G	4.38	4.38	0.00	Wildfire	0.01	WDRM v4
54	FRENCH GULCH 11022902	4.35	4.35	0.00	Wildfire	7.06	WDRM v4
55	MOUNTAIN QUARRIES 2101CB	4.33	4.27	0.06	Wildfire	0.05	WDRM v4
56	VACA DIXON 110175740	4.10	0.84	3.26	Wildfire PSPS	0.17	WDRM v4
57	TASSAJARA 2112791386	4.08	3.84	0.24	Wildfire	2.48	WDRM v4
58	VACAVILLE 110847860	4.00	0.32	3.68	PSPS	0.31	WDRM v4
59	DRUM 1101CB	3.98	3.97	0.01	Wildfire	2.16	WDRM v4
60	PARADISE 1104457900	3.98	1.11	2.87	Wildfire PSPS	3.68	WDRM v4
61	DEL MAR 210975802	3.97	0.15	3.82	PSPS	0.35	WDRM v4
62	SILVERADO 2104209359	3.94	2.48	1.46	Wildfire PSPS EPSS	0.01	WDRM v4
63	BURNS 2101BL 2101	3.93	3.93	0.00	Wildfire	0.00	WDRM v4
64	MONROE 210392868	3.91	0.30	3.60	PSPS	0.15	WDRM v4
65	POINT MORETTI 110135874	3.87	3.85	0.01	Wildfire	0.22	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
66	ORO FINO 11022236	3.85	3.83	0.02	Wildfire	2.58	WDRM v4
67	WISHON 1101CB	3.85	3.85	0.00	Wildfire	0.03	WDRM v4
68	CLAYTON 2212681608	3.71	3.45	0.26	Wildfire	33.22	WDRM v4
69	NEWARK 21KV 2111CB	3.68	3.68	0.00	Wildfire	0.00	WDRM v4
70	PLACERVILLE 210658118	3.67	2.83	0.85	Wildfire EPSS	0.11	WDRM v4
71	MIDDLETOWN 1101644756	3.66	3.56	0.10	Wildfire	15.26	WDRM v4
72	ELECTRA 1101L1697	3.65	3.51	0.14	Wildfire	7.01	WDRM v4
73	CLOVERDALE 1102672	3.64	3.54	0.10	Wildfire	22.45	WDRM v4
74	KESWICK 11011586	3.63	3.61	0.03	Wildfire	4.85	WDRM v4
75	CRESTA 1101103126	3.61	2.33	1.28	Wildfire PSPS	0.91	WDRM v4
76	FORT ROSS 1121CB	3.61	3.58	0.03	Wildfire	0.02	WDRM v4
77	VACAVILLE 1109799940	3.56	0.57	2.99	Wildfire PSPS	0.51	WDRM v4
78	CALPINE 1146CB	3.55	3.55	0.00	Wildfire	3.77	WDRM v4
79	GUSTINE 1102999258	3.53	3.53	0.00	Wildfire	0.00	WDRM v4
80	PARADISE 11042206	3.52	0.19	3.32	PSPS	1.40	WDRM v4
81	TASSAJARA 2112900058	3.51	0.13	3.38	PSPS	0.07	WDRM v4
82	PIKE CITY 11011720	3.51	3.46	0.04	Wildfire	6.02	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
83	CALPINE 1144960	3.51	3.51	0.00	Wildfire	4.06	WDRM v4
84	MADISON 1105995448	3.50	3.48	0.02	Wildfire	0.30	WDRM v4
85	CURTIS 1703258550	3.48	3.40	0.07	Wildfire	8.43	WDRM v4
86	VOLTA 110280982	3.45	0.53	2.92	Wildfire PSPS	0.51	WDRM v4
87	ALLEGHANY 1102CB	3.40	3.38	0.02	Wildfire	18.79	WDRM v4
88	SILVERADO 2104646776	3.37	2.70	0.66	Wildfire PSPS	5.67	WDRM v4
89	ALTO 1124432	3.36	3.23	0.13	Wildfire	11.92	WDRM v4
90	SILVERADO 2104940	3.31	0.12	3.20	PSPS	0.00	WDRM v4
91	SCE REFUGIO 1701CB	3.25	3.25	0.00	Wildfire	0.08	WDRM v4
92	PINECREST 0401CB	3.23	3.21	0.02	Wildfire	0.02	WDRM v4
93	TEJON 11023760	3.11	3.11	0.00	Wildfire	6.48	WDRM v4
94	CUYAMA 1103684566	3.10	3.09	0.02	Wildfire	2.58	WDRM v4
95	PIT NO 5 11011614	3.09	3.09	0.00	Wildfire	1.84	WDRM v4
96	PIT NO 3 21011482	3.07	3.06	0.01	Wildfire	12.26	WDRM v4
97	PARADISE 11051212	3.03	1.69	1.34	Wildfire PSPS	2.25	WDRM v4
98	DIAMOND SPRINGS 1106176130	3.01	0.72	2.29	Wildfire PSPS	0.02	WDRM v4
99	BALCH NO 1 1101R372	3.00	3.00	0.00	Wildfire	3.89	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
100	PIT NO 5 110190846	3.00	3.00	0.00	Wildfire	0.09	WDRM v4
101	TASSAJARA 2112D514R	2.92	0.56	2.36	Wildfire PSPS	0.58	WDRM v4
102	WHITMORE 1101WTGLR	2.91	2.70	0.21	Wildfire	0.00	WDRM v4
103	TEJON 11022455	2.89	2.61	0.28	Wildfire	7.89	WDRM v4
104	BIG BASIN 1101124854	2.89	2.89	0.00	Wildfire	0.02	WDRM v4
105	PIT NO 5 1101CB	2.87	2.86	0.02	Wildfire	0.14	WDRM v4
106	ROSSMOOR 1102457174	2.86	0.14	2.72	PSPS	0.45	WDRM v4
107	RINCON 1101CB	2.85	0.13	2.73	PSPS EPSS	0.98	WDRM v4
108	EL DORADO PH 2101757474	2.84	2.84	0.00	Wildfire	3.11	WDRM v4
109	ALLEGHANY 1101SC 1101/2	2.84	2.71	0.13	Wildfire	0.02	WDRM v4
110	MIWUK 170236888	2.82	2.81	0.01	Wildfire	0.76	WDRM v4
111	MIDDLETOWN 1101959140	2.79	2.71	0.08	Wildfire	3.86	WDRM v4
112	MARIPOSA 2101752630	2.75	2.75	0.00	Wildfire	19.24	WDRM v4
113	MONTICELLO 1101130412	2.74	2.37	0.37	Wildfire PSPS	3.71	WDRM v4
114	INDIAN FLAT 1104CB	2.73	2.69	0.04	Wildfire	11.22	WDRM v4
115	STELLING 11109265	2.71	2.67	0.04	Wildfire	5.50	WDRM v4
116	EL DORADO PH 2101CB	2.70	2.56	0.15	Wildfire	7.69	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
117	REDBUD 1101454	2.70	2.61	0.09	Wildfire	5.81	WDRM v4
118	PINE GROVE 110245292	2.68	2.42	0.26	Wildfire	12.02	WDRM v4
119	MONTE RIO 1113320	2.68	2.68	0.00	Wildfire	4.89	WDRM v4
120	CLOVERDALE 11024646	2.65	0.51	2.14	Wildfire PSPS	0.15	WDRM v4
121	SHINGLE SPRINGS 2108449638	2.63	2.62	0.01	Wildfire	0.02	WDRM v4
122	CALISTOGA 1101894220	2.62	2.54	0.08	Wildfire	11.23	WDRM v4
123	ALTO 11243745	2.56	2.46	0.10	Wildfire	5.69	WDRM v4
124	HIGHLANDS 1102628	2.56	2.54	0.01	Wildfire	19.38	WDRM v4
125	JAMESON 110560052	2.55	2.52	0.03	Wildfire	7.02	WDRM v4
126	STANISLAUS 1702CB	2.54	2.40	0.14	Wildfire	8.91	WDRM v4
127	OAKLAND K 1101CR178	2.52	0.32	2.20	Wildfire PSPS	0.51	WDRM v4
128	SHINGLE SPRINGS 210551738	2.50	0.09	2.41	PSPS EPSS	0.02	WDRM v4
129	BIG BEND 1101CB	2.50	2.24	0.25	Wildfire	23.51	WDRM v4
130	PLACERVILLE 1109CB	2.49	0.55	1.94	Wildfire PSPS	0.01	WDRM v4
131	VACAVILLE 1103CB	2.49	0.12	2.38	PSPS	0.00	WDRM v4
132	CALAVERAS CEMENT 1101544800	2.49	2.48	0.01	Wildfire	23.54	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
133	ALLEGHANY 1101DC 1101/2	2.48	2.34	0.14	Wildfire	0.02	WDRM v4
134	PARADISE 1105829194	2.45	2.14	0.30	Wildfire PSPS	16.33	WDRM v4
135	RINCON 110275816	2.44	0.04	2.39	PSPS	0.00	WDRM v4
136	WILLOW CREEK 1103181562	2.42	1.99	0.43	Wildfire EPSS	0.00	WDRM v4
137	MARIPOSA 2102241564	2.42	2.00	0.42	Wildfire EPSS	1.03	WDRM v4
138	BONNIE NOOK 1102542186	2.41	2.35	0.05	Wildfire	8.13	WDRM v4
139	TULE POWER HOUSE 1101CB	2.40	2.40	0.00	Wildfire	4.26	WDRM v4
140	PARADISE 1104954322	2.39	1.61	0.79	Wildfire PSPS	3.40	WDRM v4
141	SAN LUIS OBISPO 1104982992	2.38	2.38	0.00	Wildfire	8.63	WDRM v4
142	MIWUK 17021808	2.38	2.10	0.28	Wildfire PSPS	3.32	WDRM v4
143	CORNING 110185152	2.36	2.09	0.27	Wildfire PSPS	25.52	WDRM v4
144	SANTA YNEZ 1101980192	2.35	2.31	0.05	Wildfire	3.88	WDRM v4
145	TASSAJARA 2112676362	2.35	2.33	0.02	Wildfire	3.15	WDRM v4
146	DEL MONTE 2104181640	2.35	2.06	0.29	Wildfire EPSS	0.02	WDRM v4
147	SILVERADO 210478268	2.35	1.80	0.55	Wildfire PSPS	13.60	WDRM v4
148	PUEBLO 110298730	2.33	0.14	2.20	PSPS	0.00	WDRM v4
149	BUCKS CREEK 1103CB	2.33	2.30	0.04	Wildfire	2.67	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
150	ALLEGHANY 1101VR816	2.31	2.16	0.15	Wildfire	6.24	WDRM v4
151	CALPINE 1144CB	2.29	2.22	0.07	Wildfire	26.76	WDRM v4
152	PEORIA 1704877670	2.28	2.27	0.01	Wildfire	6.38	WDRM v4
153	SILVERADO 2104324994	2.27	2.06	0.21	Wildfire	0.78	WDRM v4
154	CALPINE 1146400	2.22	2.22	0.00	Wildfire	1.84	WDRM v4
155	ROUND MOUNTAIN 1101CB	2.21	2.21	0.00	Wildfire	0.02	WDRM v4
156	FORT ROSS 112170288	2.21	2.20	0.01	Wildfire	25.01	WDRM v4
157	CASTRO VALLEY 1108MR233	2.21	0.18	2.03	PSPS	0.13	WDRM v4
158	PUEBLO 2103489964	2.20	0.08	2.12	PSPS	0.00	WDRM v4
159	CALAVERAS CEMENT 11011419	2.19	2.16	0.04	Wildfire	15.48	WDRM v4
160	ELECTRA 11017104	2.18	2.10	0.09	Wildfire	13.58	WDRM v4
161	MARIPOSA 2102851902	2.18	2.09	0.09	Wildfire	5.20	WDRM v4
162	OAKLAND K 1102172340	2.15	0.60	1.55	Wildfire PSPS	1.46	WDRM v4
163	SILVERADO 2105990552	2.15	0.66	1.49	Wildfire PSPS EPSS	0.93	WDRM v4
164	PLACERVILLE 2106CB	2.14	1.98	0.16	Wildfire	6.28	WDRM v4
165	VACAVILLE 110838316	2.14	2.07	0.07	Wildfire	15.73	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
166	RINCON 1103472	2.14	0.08	2.05	PSPS	4.30	WDRM v4
167	STELLING 1110568350	2.13	2.09	0.04	Wildfire	11.48	WDRM v4
168	ALLEGHANY 1101806	2.12	2.11	0.01	Wildfire	11.98	WDRM v4
169	PIT NO 3 2101CB	2.11	2.11	0.01	Wildfire	5.50	WDRM v4
170	FORESTHILL 110150486	2.11	1.91	0.19	Wildfire	14.76	WDRM v4
171	VACAVILLE 1108922767	2.11	1.67	0.44	Wildfire PSPS	8.41	WDRM v4
172	SILVERADO 2104CB	2.10	0.11	1.99	PSPS	0.00	WDRM v4
173	RINCON 1102CB	2.08	0.15	1.93	PSPS	1.94	WDRM v4
174	PARADISE 1105878870	2.07	1.20	0.87	Wildfire PSPS EPSS	13.68	WDRM v4
175	SHADY GLEN 1101941844	2.06	1.74	0.32	Wildfire PSPS	17.89	WDRM v4
176	PUTAH CREEK 110267858	2.06	1.96	0.09	Wildfire	11.18	WDRM v4
177	PIKE CITY 1102CB	2.05	1.94	0.10	Wildfire	9.85	WDRM v4
178	FRENCH GULCH 1101CB	2.04	1.92	0.12	Wildfire	2.71	WDRM v4
179	MIDDLETOWN 1101614	2.03	1.22	0.81	Wildfire PSPS	2.07	WDRM v4
180	BONNIE NOOK 1101CB	2.02	1.86	0.16	Wildfire	17.75	WDRM v4
181	COALINGA NO 2 11059260	2.02	2.01	0.01	Wildfire	0.00	WDRM v4
182	CLAYTON 2212614950	2.02	1.98	0.03	Wildfire	0.68	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
183	PUEBLO 110247720	2.01	0.12	1.89	PSPS	0.00	WDRM v4
184	NOTRE DAME 11042028	2.01	2.00	0.01	Wildfire	11.41	WDRM v4
185	CLAYTON 2212334476	2.00	0.85	1.15	Wildfire PSPS	0.03	WDRM v4
186	SUNOL 1101298061	1.99	1.93	0.07	Wildfire	6.55	WDRM v4
187	MOUNTAIN QUARRIES 21011130	1.99	1.90	0.08	Wildfire	21.48	WDRM v4
188	RINCON 1104786782	1.98	0.38	1.60	Wildfire PSPS	3.15	WDRM v4
189	GARCIA 0401CB	1.98	1.98	0.00	Wildfire	0.03	WDRM v4
190	DUNBAR 1103799422	1.96	1.84	0.13	Wildfire	0.43	WDRM v4
191	VACAVILLE 1104293462	1.96	1.89	0.08	Wildfire	1.08	WDRM v4
192	HARTLEY 1101698	1.95	1.94	0.01	Wildfire	21.28	WDRM v4
193	PUTAH CREEK 1105665952	1.95	1.83	0.11	Wildfire	0.06	WDRM v4
194	SILVERADO 2104632	1.95	1.76	0.19	Wildfire	18.81	WDRM v4
195	SILVERADO 2105CB	1.94	0.12	1.81	PSPS EPSS	0.02	WDRM v4
196	TEJON 1102732836	1.93	1.41	0.52	Wildfire PSPS	17.45	WDRM v4
197	CAMP EVERS 2104189010	1.93	0.54	1.39	Wildfire EPSS	0.03	WDRM v4
198	APPLE HILL 110497086	1.92	1.83	0.09	Wildfire	28.40	WDRM v4
199	CALISTOGA 1101730666	1.91	1.90	0.01	Wildfire	2.19	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
200	WEST POINT 110236676	1.91	1.85	0.06	Wildfire	17.42	WDRM v4
201	KONOCTI 1102714370	1.91	1.83	0.08	Wildfire	2.96	WDRM v4
202	SILVERADO 2104806500	1.90	1.49	0.42	Wildfire PSPS	14.27	WDRM v4
203	STILLWATER 11021466	1.90	1.70	0.20	Wildfire PSPS	23.25	WDRM v4
204	PIT NO 3 21011480	1.89	1.88	0.01	Wildfire	2.21	WDRM v4
205	NARROWS PH 1151CB	1.88	1.88	0.00	Wildfire	0.20	WDRM v4
206	WILDWOOD 11011454	1.88	1.87	0.01	Wildfire	7.94	WDRM v4
207	PINE GROVE 1101CB	1.88	1.70	0.17	Wildfire	5.08	WDRM v4
208	REDBUD 1101323962	1.88	1.50	0.37	Wildfire PSPS	16.91	WDRM v4
209	PLACERVILLE 21069712	1.87	1.78	0.10	Wildfire	26.16	WDRM v4
210	CLARKSVILLE 2106CB	1.87	0.09	1.78	PSPS	0.01	WDRM v4
211	WOODACRE 1102851	1.87	1.49	0.39	Wildfire PSPS	2.23	WDRM v4
212	SARATOGA 1107667000	1.87	1.82	0.05	Wildfire	8.47	WDRM v4
213	ELECTRA 1101CB	1.86	1.79	0.06	Wildfire	23.97	WDRM v4
214	MARIPOSA 2101439030	1.86	1.85	0.00	Wildfire	21.06	WDRM v4
215	ANTLER 11011376	1.86	1.78	0.08	Wildfire	9.32	WDRM v4
216	FRENCH GULCH 11011464	1.85	1.85	0.00	Wildfire	0.90	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
217	ALTO 11221260	1.85	1.85	0.00	Wildfire	5.71	WDRM v4
218	RINCON 1104CB	1.85	0.07	1.78	PSPS	0.00	WDRM v4
219	TEJON 11023751	1.85	1.64	0.21	Wildfire PSPS	8.68	WDRM v4
220	RINCON 1102640	1.84	0.06	1.78	PSPS	0.00	WDRM v4
221	CLARK ROAD 110247006	1.84	1.59	0.26	Wildfire PSPS	4.69	WDRM v4
222	VACAVILLE 11046542	1.84	0.67	1.17	Wildfire PSPS	12.18	WDRM v4
223	BIG BEND 1101641808	1.84	1.65	0.19	Wildfire PSPS	29.53	WDRM v4
224	PIT NO 5 11011658	1.83	1.83	0.01	Wildfire	4.76	WDRM v4
225	REDBUD 1101754544	1.83	1.80	0.03	Wildfire	4.16	WDRM v4
226	PIKE CITY 1101417084	1.83	1.62	0.21	Wildfire PSPS	12.31	WDRM v4
227	BEAR VALLEY 2105CB	1.82	1.79	0.03	Wildfire	3.72	WDRM v4
228	CALAVERAS CEMENT 110147968	1.80	1.78	0.02	Wildfire	17.33	WDRM v4
229	EL DORADO PH 210219562	1.79	1.45	0.34	Wildfire PSPS	3.38	WDRM v4
230	DUNLAP 1103CB	1.79	1.77	0.02	Wildfire	5.62	WDRM v4
231	RINCON 1103649194	1.78	0.05	1.73	PSPS	0.00	WDRM v4
232	SANTA YNEZ 1102320270	1.78	1.76	0.02	Wildfire	8.54	WDRM v4
233	EL DORADO PH 2102927014	1.78	1.25	0.53	Wildfire PSPS	5.09	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
234	FORESTHILL 1102359542	1.78	1.63	0.14	Wildfire	19.43	WDRM v4
235	MIDDLETOWN 1101548	1.77	1.51	0.26	Wildfire PSPS	31.27	WDRM v4
236	CLOVERDALE 110282888	1.77	0.11	1.66	PSPS	0.00	WDRM v4
237	BIG BEND 1102884340	1.76	0.66	1.10	Wildfire PSPS	1.11	WDRM v4
238	STANISLAUS 1701CB	1.76	1.70	0.06	Wildfire	38.52	WDRM v4
239	COLUMBIA HILL 11012212	1.76	1.64	0.11	Wildfire	8.90	WDRM v4
240	MOLINO 1102318	1.75	1.72	0.03	Wildfire	27.80	WDRM v4
241	LAURELES 111110141	1.75	1.69	0.06	Wildfire	3.66	WDRM v4
242	LAYTONVILLE 1101518	1.73	1.70	0.03	Wildfire	2.16	WDRM v4
243	SHADY GLEN 11012768	1.73	1.55	0.18	Wildfire PSPS	7.33	WDRM v4
244	LARKIN (Y) 1127CB	1.73	1.73	0.00	Wildfire	0.00	WDRM v4
245	SHADY GLEN 1101898212	1.73	0.93	0.80	Wildfire PSPS	0.42	WDRM v4
246	EL DORADO PH 2102CB	1.73	1.43	0.30	Wildfire PSPS	6.66	WDRM v4
247	WEST POINT 11021305	1.72	1.69	0.04	Wildfire	11.89	WDRM v4
248	PLACERVILLE 2106935216	1.72	1.66	0.06	Wildfire	21.78	WDRM v4
249	PIT NO 7 1101CB	1.71	1.70	0.00	Wildfire	2.84	WDRM v4
250	MIDDLETOWN 11011314	1.70	1.28	0.42	Wildfire PSPS	0.98	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
251	ELK 1101CB	1.70	1.68	0.02	Wildfire	0.01	WDRM v4
252	DUNBAR 1103234	1.69	1.38	0.31	Wildfire PSPS	7.76	WDRM v4
253	ANTLER 1101484276	1.69	1.69	0.00	Wildfire	5.72	WDRM v4
254	BEAR VALLEY 21059480	1.69	1.67	0.02	Wildfire	12.52	WDRM v4
255	COVELO 1101516510	1.68	1.68	0.00	Wildfire	3.81	WDRM v4
256	COALINGA NO 2 1105897858	1.68	1.59	0.09	Wildfire	0.00	WDRM v4
257	FROGTOWN 17011623	1.67	1.66	0.01	Wildfire	15.95	WDRM v4
258	SALT SPRINGS 21023118	1.67	1.59	0.07	Wildfire	0.06	WDRM v4
259	MARIPOSA 2101CB	1.67	1.59	0.07	Wildfire	2.68	WDRM v4
260	SAN RAFAEL 11011250	1.66	1.66	0.00	Wildfire	3.68	WDRM v4
261	GEYSERVILLE 1102904170	1.66	1.54	0.12	Wildfire	21.44	WDRM v4
262	CLAYTON 2212204416	1.66	1.59	0.07	Wildfire	12.92	WDRM v4
263	SO. CAL. EDISON #3 1101CB	1.65	1.65	0.00	Wildfire	9.35	WDRM v4
264	ORO FINO 1101CB	1.65	1.05	0.59	Wildfire PSPS	21.37	WDRM v4
265	MOUNTAIN QUARRIES 2101979598	1.65	1.54	0.10	Wildfire	3.83	WDRM v4
266	DUNBAR 1103160	1.64	0.10	1.55	PSPS	0.19	WDRM v4
267	FORESTHILL 11011802	1.64	1.39	0.25	Wildfire PSPS	25.45	WDRM v4

TABLE 5-5B:
SUMMARY OF TOP RISK CIRCUIT SEGMENTS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Risk Ranking	Circuit, Segment, or Span ID	Overall Utility Risk Score	Wildfire Risk Score	Outage Program Risk Score	Top Risk Contributors	Total Miles	Version of Risk Model Used
268	STANISLAUS 17026028	1.64	1.51	0.14	Wildfire	9.35	WDRM v4
269	MONTE RIO 1113CB	1.64	1.53	0.11	Wildfire	0.05	WDRM v4
270	CHALLENGE 1102CB	1.64	1.45	0.19	Wildfire	16.05	WDRM v4
271	SILVERADO 2104633600	1.63	1.45	0.18	Wildfire PSPS	25.06	WDRM v4
272	CORDELIA 111240402	1.63	0.05	1.58	PSPS	0.00	WDRM v4
273	WEST POINT 110112256	1.62	1.46	0.17	Wildfire	7.36	WDRM v4
274	GIRVAN 11011330	1.60	1.42	0.18	Wildfire PSPS	26.00	WDRM v4
275	EL DORADO PH 210119752	1.60	1.44	0.15	Wildfire	41.58	WDRM v4

(a) Adjusted in response to Critical Issue RN-PGE-26-02.

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
1	DUNBAR 11034882	176.19	Vegetation routine patrol Vegetation hazard patrol	176.19	Vegetation routine patrol Vegetation hazard patrol	176.19	Vegetation routine patrol Vegetation hazard patrol	176.19
2	PUEBLO 1104968601	126.37	EPSS Vegetation routine patrol Vegetation hazard patrol	122.22	EPSS Vegetation routine patrol Vegetation hazard patrol	122.22	EPSS Vegetation routine patrol Vegetation hazard patrol	122.22
3	ARBUCKLE 110130376	97.21	Vegetation routine patrol Vegetation hazard patrol	97.21	Vegetation routine patrol Vegetation hazard patrol	97.21	Vegetation routine patrol Vegetation hazard patrol	97.21
4	VACAVILLE 111112342	82.76	EPSS Vegetation routine patrol Vegetation hazard patrol	81.88	EPSS Vegetation routine patrol Vegetation hazard patrol	81.88	EPSS Vegetation routine patrol Vegetation hazard patrol	81.88
5	BALCH NO 1 1101CB	72.56	EPSS Vegetation routine patrol Vegetation hazard patrol	25.24	EPSS Vegetation routine patrol Vegetation hazard patrol	25.24	EPSS Vegetation routine patrol Vegetation hazard patrol	25.24

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
6	CALPINE 1144276-G	47.93	EPSS Vegetation routine patrol Vegetation hazard patrol	16.67	EPSS Vegetation routine patrol Vegetation hazard patrol	16.67	EPSS Vegetation routine patrol Vegetation hazard patrol	16.67
7	CASTRO VALLEY 1110MR525	39.73	EPSS Vegetation routine patrol Vegetation hazard patrol	39.38	EPSS Vegetation routine patrol Vegetation hazard patrol	39.38	EPSS Vegetation routine patrol Vegetation hazard patrol	39.38
8	MARIPOSA REMOTE 0001CB	33.68	EPSS Vegetation routine patrol Vegetation hazard patrol	11.48	EPSS Vegetation routine patrol Vegetation hazard patrol	11.21	EPSS Vegetation routine patrol Vegetation hazard patrol	10.91
9	SPAULDING 1101CB	30.92	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	10.39	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	10.02	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	9.65

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
10	TIGER CREEK 0201CB	29.47	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	4.39	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	4.21	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	4.03
11	VACAVILLE 1111772224	29.44	EPSS Vegetation routine patrol Vegetation hazard patrol	28.94	EPSS Vegetation routine patrol Vegetation hazard patrol	28.94	EPSS Vegetation routine patrol Vegetation hazard patrol	28.94
12	CALPINE 1144962	25.88	EPSS Vegetation routine patrol Vegetation hazard patrol	9.00	EPSS Vegetation routine patrol Vegetation hazard patrol	9.00	EPSS Vegetation routine patrol Vegetation hazard patrol	9.00
13	CORDELIA 111013382	22.36	Vegetation routine patrol Vegetation hazard patrol	22.36	Vegetation routine patrol Vegetation hazard patrol	22.36	Vegetation routine patrol Vegetation hazard patrol	22.36

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
14	KESWICK 1101CB	20.50	EPSS Vegetation routine patrol Vegetation hazard patrol	7.18	Undergrounding EPSS Vegetation routine patrol Vegetation hazard patrol	5.51	EPSS Vegetation routine patrol Vegetation hazard patrol	5.51
15	SPRING GAP 1702188426	16.12	EPSS Vegetation routine patrol Vegetation hazard patrol	5.61	EPSS Vegetation routine patrol Vegetation hazard patrol	5.61	EPSS Vegetation routine patrol Vegetation hazard patrol	5.61
16	TASSAJARA 21123202	14.62	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	5.91	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	5.88	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	5.86
17	BALCH NO 1 1101105414	13.08	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.46	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.45	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.45

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
18	CLARKSVILLE 210551478	10.91	EPSS Vegetation routine patrol Vegetation hazard patrol	10.65	EPSS Vegetation routine patrol Vegetation hazard patrol	10.65	EPSS Vegetation routine patrol Vegetation hazard patrol	10.65
19	BALCH NO 1 1101406582	10.88	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.92	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.92	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.92
20	BUCKS CREEK 1102CB	10.09	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.60	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.52	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.00
21	PEABODY 2106CB	9.95	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	9.51	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	9.51	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	9.51

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
22	APPLE HILL 1104814656	9.86	EPSS Vegetation routine patrol Vegetation hazard patrol	3.44	EPSS Vegetation routine patrol Vegetation hazard patrol	3.44	EPSS Vegetation routine patrol Vegetation hazard patrol	3.44
23	SCE TEJON TIE 1101CB	9.80	EPSS Vegetation routine patrol Vegetation hazard patrol	3.41	Undergrounding EPSS Vegetation routine patrol Vegetation hazard patrol	2.48	EPSS Vegetation routine patrol Vegetation hazard patrol	2.48
24	APPLE HILL 2102CB	8.46	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.21	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.94	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.80
25	MIWUK 170179118	8.22	EPSS Vegetation routine patrol Vegetation hazard patrol	7.12	Overhead hardening EPSS Vegetation routine patrol Vegetation hazard patrol	6.70	EPSS Vegetation routine patrol Vegetation hazard patrol	6.70

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
26	SALT SPRINGS 210110416	7.67	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.77	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.77	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.76
27	DEL MAR 210938684	7.17	Vegetation routine patrol Vegetation hazard patrol	7.17	Vegetation routine patrol Vegetation hazard patrol	7.17	Vegetation routine patrol Vegetation hazard patrol	7.17
28	OAKLAND J 1102CR102	6.97	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	6.61	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	6.61	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	6.60
29	WILDWOOD 1101384582	6.78	EPSS Vegetation routine patrol Vegetation hazard patrol	2.36	EPSS Vegetation routine patrol Vegetation hazard patrol	2.36	EPSS Vegetation routine patrol Vegetation hazard patrol	2.36

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
30	ALLEGHANY 1102WC 1101/2	6.53	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.10	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.87	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.63
31	CALPINE 1146200-G	5.80	EPSS Vegetation routine patrol Vegetation hazard patrol	2.02	EPSS Vegetation routine patrol Vegetation hazard patrol	2.02	EPSS Vegetation routine patrol Vegetation hazard patrol	2.02
32	MARIPOSA 2101929360	5.68	EPSS Vegetation routine patrol Vegetation hazard patrol	1.99	EPSS Vegetation routine patrol Vegetation hazard patrol	1.99	EPSS Vegetation routine patrol Vegetation hazard patrol	1.99
33	CALPINE 1144304	5.64	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.97	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.93	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.90

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
34	MONTICELLO 11011780	5.62	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	4.83	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	4.82	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	4.80
35	CEDAR CREEK 1101451856	5.58	EPSS Vegetation routine patrol Vegetation hazard patrol	2.30	Overhead hardening EPSS Vegetation routine patrol Vegetation hazard patrol	1.23	EPSS Vegetation routine patrol Vegetation hazard patrol	1.23
36	WYANDOTTE 11102590	5.48	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	5.48	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	5.48	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	5.48
37	VACAVILLE 1104CB	5.41	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	5.21	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	5.21	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	5.21

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
38	RINCON 1102228730	5.35	Vegetation routine patrol Vegetation hazard patrol	5.35	Vegetation routine patrol Vegetation hazard patrol	5.35	Vegetation routine patrol Vegetation hazard patrol	5.35
39	ELECTRA 1102CB	5.30	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.90	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.90	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.89
40	KESWICK 1101417066	5.27	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.11	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.69	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.69
41	PIT NO 5 1101923612	5.15	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.79	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.78	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.76

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
42	NARROWS 2104CB	5.06	EPSS Vegetation routine patrol Vegetation hazard patrol	1.76	EPSS Vegetation routine patrol Vegetation hazard patrol	1.76	EPSS Vegetation routine patrol Vegetation hazard patrol	1.76
43	FRENCH GULCH 11011892	5.05	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.76	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.56	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.55
44	MARINA (F) 1101CB	5.03	Vegetation routine patrol Vegetation hazard patrol	5.03	Vegetation routine patrol Vegetation hazard patrol	5.03	Vegetation routine patrol Vegetation hazard patrol	5.03
45	CALISTOGA 110135588	4.99	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.16	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.28	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.23

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
46	VACAVILLE 1104196294	4.95	EPSS Vegetation routine patrol Vegetation hazard patrol	4.55	EPSS Vegetation routine patrol Vegetation hazard patrol	4.55	EPSS Vegetation routine patrol Vegetation hazard patrol	4.55
47	DOBBINS 1101CB	4.84	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.71	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.70	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.68
48	CLAYTON 221296224	4.68	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.21	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.87	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.84
49	WEST POINT 1101CB	4.52	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.53	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.30	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.24

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
50	TIGER CREEK 0201320746	4.50	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.53	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.48	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.44
51	TRIDAM POWERHOUSE 2101CB	4.48	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.51	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.47	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.42
52	ELECTRA 110213414	4.43	Vegetation routine patrol Vegetation hazard patrol	4.43	Vegetation routine patrol Vegetation hazard patrol	4.43	Vegetation routine patrol Vegetation hazard patrol	4.43
53	CALPINE 1146394G	4.38	EPSS Vegetation routine patrol Vegetation hazard patrol	1.52	EPSS Vegetation routine patrol Vegetation hazard patrol	1.52	EPSS Vegetation routine patrol Vegetation hazard patrol	1.52

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
54	FRENCH GULCH 11022902	4.35	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.51	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.72	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.72
55	MOUNTAIN QUARRIES 2101CB	4.33	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.51	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.46	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.42
56	VACA DIXON 110175740	4.10	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.56	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.55	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.55
57	TASSAJARA 2112791386	4.08	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.55	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.52	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.49

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
58	VACAVILLE 110847860	4.00	EPSS Vegetation routine patrol Vegetation hazard patrol	3.80	EPSS Vegetation routine patrol Vegetation hazard patrol	3.80	EPSS Vegetation routine patrol Vegetation hazard patrol	3.80
59	DRUM 1101CB	3.98	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.02	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.54	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.51
60	PARADISE 1104457900	3.98	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.28	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.27	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.27
61	DEL MAR 210975802	3.97	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.88	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.88	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.88

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
62	SILVERADO 2104209359	3.94	EPSS Vegetation routine patrol Vegetation hazard patrol	2.41	EPSS Vegetation routine patrol Vegetation hazard patrol	2.41	Undergrounding EPSS Vegetation routine patrol Vegetation hazard patrol	1.71
63	BURNS 2101BL 2101	3.93	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.05	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.73	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.40
64	MONROE 210392868	3.91	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.72	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.72	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.72
65	POINT MORETTI 110135874	3.87	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.26	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.92	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.82

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
66	ORO FINO 11022236	3.85	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.31	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.23	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.18
67	WISHON 1101CB	3.85	EPSS Vegetation routine patrol Vegetation hazard patrol	1.34	EPSS Vegetation routine patrol Vegetation hazard patrol	1.34	EPSS Vegetation routine patrol Vegetation hazard patrol	1.34
68	CLAYTON 2212681608	3.71	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.77	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.73	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.69
69	NEWARK 21KV 2111CB	3.68	Vegetation routine patrol Vegetation hazard patrol	3.68	Vegetation routine patrol Vegetation hazard patrol	3.68	Vegetation routine patrol Vegetation hazard patrol	3.68

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
70	PLACERVILLE 210658118	3.67	EPSS Vegetation routine patrol Vegetation hazard patrol	1.82	EPSS Vegetation routine patrol Vegetation hazard patrol	1.82	EPSS Vegetation routine patrol Vegetation hazard patrol	1.82
71	MIDDLETOWN 1101644756	3.66	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.31	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.28	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.24
72	ELECTRA 1101L1697	3.65	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.34	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.31	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.28
73	CLOVERDALE 1102672	3.64	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.30	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.01	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.01

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
74	KESWICK 11011586	3.63	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.25	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.14	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.11
75	CRESTA 1101103126	3.61	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.12	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.12	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.12
76	FORT ROSS 1121CB	3.61	EPSS Vegetation routine patrol Vegetation hazard patrol	1.28	Overhead hardening EPSS Vegetation routine patrol Vegetation hazard patrol	1.19	EPSS Vegetation routine patrol Vegetation hazard patrol	1.19
77	VACAVILLE 1109799940	3.56	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.19	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.19	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.18

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
78	CALPINE 1146CB	3.55	EPSS Vegetation routine patrol Vegetation hazard patrol	1.24	EPSS Vegetation routine patrol Vegetation hazard patrol	1.24	EPSS Vegetation routine patrol Vegetation hazard patrol	1.24
79	GUSTINE 1102999258	3.53	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.23	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.23	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.23
80	PARADISE 11042206	3.52	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.40	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.40	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.39
81	TASSAJARA 2112900058	3.51	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.43	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.43	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.43

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
82	PIKE CITY 11011720	3.51	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.09	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.04	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.03
83	CALPINE 1144960	3.51	EPSS Vegetation routine patrol Vegetation hazard patrol	1.22	EPSS Vegetation routine patrol Vegetation hazard patrol	1.22	EPSS Vegetation routine patrol Vegetation hazard patrol	1.22
84	MADISON 1105995448	3.50	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.23	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.22	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.22
85	CURTIS 1703258550	3.48	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.90	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.88	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.85

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
86	VOLTA 110280982	3.45	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.12	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.12	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	3.12
87	ALLEGHANY 1102CB	3.40	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.06	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.02	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.01
88	SILVERADO 2104646776	3.37	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.59	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.75	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.71

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
89	ALTO 1124432	3.36	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.21	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.44	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.39
90	SILVERADO 2104940	3.31	Vegetation routine patrol Vegetation hazard patrol	3.31	Vegetation routine patrol Vegetation hazard patrol	3.31	Vegetation routine patrol Vegetation hazard patrol	3.31
91	SCE REFUGIO 1701CB	3.25	EPSS Vegetation routine patrol Vegetation hazard patrol	1.13	Undergrounding EPSS Vegetation routine patrol Vegetation hazard patrol	0.04	EPSS Vegetation routine patrol Vegetation hazard patrol	0.04
92	PINECREST 0401CB	3.23	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.05	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.33	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.24

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
94	CUYAMA 1103684566	3.10	EPSS Vegetation routine patrol Vegetation hazard patrol	1.09	EPSS Vegetation routine patrol Vegetation hazard patrol	1.09	EPSS Vegetation routine patrol Vegetation hazard patrol	1.09
95	PIT NO 5 11011614	3.09	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.07	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.10	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.10
96	PIT NO 3 21011482	3.07	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.07	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.08	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.07
97	PARADISE 11051212	3.03	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.96	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.96	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.96

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
93	TEJON 11023760	3.11	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.08	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.79	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.78
98	DIAMOND SPRINGS 1106176130	3.01	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.55	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.53	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.51
99	BALCH NO 1 1101R372	3.00	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.04	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.49	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.49

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
100	PIT NO 5 110190846	3.00	EPSS Vegetation routine patrol Vegetation hazard patrol	1.04	Overhead hardening EPSS Vegetation routine patrol Vegetation hazard patrol	0.51	EPSS Vegetation routine patrol Vegetation hazard patrol	0.51
101	TASSAJARA 2112D514R	2.92	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.57	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.57	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.57
102	WHITMORE 1101WTGLR	2.91	EPSS Vegetation routine patrol Vegetation hazard patrol	1.16	EPSS Vegetation routine patrol Vegetation hazard patrol	1.16	EPSS Vegetation routine patrol Vegetation hazard patrol	1.16
103	TEJON 11022455	2.89	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.14	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.11	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.07

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
104	BIG BASIN 1101124854	2.89	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.97	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.93	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.89
105	PIT NO 5 1101CB	2.87	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.20	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.19	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.19
106	ROSSMOOR 1102457174	2.86	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.77	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.77	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.77

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
107	RINCON 1101CB	2.85	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.77	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.77	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.77
108	EL DORADO PH 2101757474	2.84	EPSS Vegetation routine patrol Vegetation hazard patrol	0.99	EPSS Vegetation routine patrol Vegetation hazard patrol	0.99	EPSS Vegetation routine patrol Vegetation hazard patrol	0.99
109	ALLEGHANY 1101SC 1101/2	2.84	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.00	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.92	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.84

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
110	MIWUK 170236888	2.82	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.77	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.42	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.42
111	MIDDLETOWN 1101959140	2.79	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.55	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.46	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.44
112	MARIPOSA 2101752630	2.75	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.94	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.35	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.33

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
113	MONTICELLO 1101130412	2.74	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.18	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.16	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.41
114	INDIAN FLAT 1104CB	2.73	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.52	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.50	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.49
115	STELLING 11109265	2.71	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.97	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.94	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.11

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
116	EL DORADO PH 2101CB	2.70	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.42	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.42	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.42
117	REDBUD 1101454	2.70	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.99	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.98	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.97
118	PINE GROVE 110245292	2.68	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.09	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.17	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.09

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
119	MONTE RIO 1113320	2.68	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.92	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.07	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.06
120	CLOVERDALE 11024646	2.65	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.33	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.33	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.33
121	SHINGLE SPRINGS 2108449638	2.63	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.89	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.86	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.83

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
122	CALISTOGA 1101894220	2.62	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.72	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.71	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.71
123	ALTO 11243745	2.56	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.92	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.86	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.02
124	HIGHLANDS 1102628	2.56	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.72	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.56	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.23

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
125	JAMESON 110560052	2.55	EPSS Vegetation routine patrol Vegetation hazard patrol	0.91	Overhead hardening EPSS Vegetation routine patrol Vegetation hazard patrol	0.90	Undergrounding EPSS Vegetation routine patrol Vegetation hazard patrol	0.66
126	STANISLAUS 1702CB	2.54	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.93	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.92	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.90
127	OAKLAND K 1101CR178	2.52	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.30	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.29	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.29

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
128	SHINGLE SPRINGS 210551738	2.50	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.44	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.44	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.44
129	BIG BEND 1101CB	2.50	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.03	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.01	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.00
130	PLACERVILLE 1109CB	2.49	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.15	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.15	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.14
131	VACAVILLE 1103CB	2.49	EPSS Vegetation routine patrol Vegetation hazard patrol	2.42	EPSS Vegetation routine patrol Vegetation hazard patrol	2.42	EPSS Vegetation routine patrol Vegetation hazard patrol	2.42

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[a]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
132	CALAVERAS CEMENT 1101544800	2.49	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.86	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.46	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.08
133	ALLEGHANY 1101DC 1101/2	2.48	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.84	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.72	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.60
134	PARADISE 1105829194	2.45	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.04	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.02	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.99
135	RINCON 110275816	2.44	Vegetation routine patrol Vegetation hazard patrol	2.44	Vegetation routine patrol Vegetation hazard patrol	2.44	Vegetation routine patrol Vegetation hazard patrol	2.44

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
136	WILLOW CREEK 1103181562	2.42	EPSS Vegetation routine patrol Vegetation hazard patrol	1.17	EPSS Vegetation routine patrol Vegetation hazard patrol	1.17	EPSS Vegetation routine patrol Vegetation hazard patrol	1.17
137	MARIPOSA 2102241564	2.42	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.12	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.12	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.12
138	BONNIE NOOK 1102542186	2.41	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.87	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.14	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.09
139	TULE POWER HOUSE 1101CB	2.40	EPSS Vegetation routine patrol Vegetation hazard patrol	0.84	Overhead hardening EPSS Vegetation routine patrol Vegetation hazard patrol	0.43	Undergrounding EPSS Vegetation routine patrol Vegetation hazard patrol	0.40

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
140	PARADISE 1104954322	2.39	EPSS Vegetation routine patrol Vegetation hazard patrol	1.36	EPSS Vegetation routine patrol Vegetation hazard patrol	1.35	Overhead hardening Undergrounding EPSS Vegetation routine patrol Vegetation hazard patrol	0.41
141	SAN LUIS OBISPO 1104982992	2.38	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.81	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.70	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.17
142	MIWUK 17021808	2.38	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.98	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.94	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.91

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
143	CORNING 110185152	2.36	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.99	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.98	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.96
144	SANTA YNEZ 1101980192	2.35	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.84	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.21	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.20
145	TASSAJARA 2112676362	2.35	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.82	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.79	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.12

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
146	DEL MONTE 2104181640	2.35	EPSS Vegetation routine patrol Vegetation hazard patrol	1.02	Overhead hardening EPSS Vegetation routine patrol Vegetation hazard patrol	0.83	EPSS Vegetation routine patrol Vegetation hazard patrol	0.83
147	SILVERADO 210478268	2.35	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.79	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.77	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.74
148	PUEBLO 110298730	2.33	Vegetation routine patrol Vegetation hazard patrol	2.33	Vegetation routine patrol Vegetation hazard patrol	2.33	Vegetation routine patrol Vegetation hazard patrol	2.33
149	BUCKS CREEK 1103CB	2.33	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.83	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.83	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.72

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
150	ALLEGHANY 1101VR816	2.31	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.26	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.25	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.23
151	CALPINE 1144CB	2.29	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.84	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.84	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.84
152	PEORIA 1704877670	2.28	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.79	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.13	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.12

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
153	SILVERADO 2104324994	2.27	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.92	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.88	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.34
154	CALPINE 1146400	2.22	EPSS Vegetation routine patrol Vegetation hazard patrol	0.77	EPSS Vegetation routine patrol Vegetation hazard patrol	0.77	EPSS Vegetation routine patrol Vegetation hazard patrol	0.77
155	ROUND MOUNTAIN 1101CB	2.21	EPSS Vegetation routine patrol Vegetation hazard patrol	0.77	Overhead hardening EPSS Vegetation routine patrol Vegetation hazard patrol	0.70	EPSS Vegetation routine patrol Vegetation hazard patrol	0.70
156	FORT ROSS 112170288	2.21	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.74	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.01	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.00

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
157	CASTRO VALLEY 1108MR233	2.21	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.09	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.09	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.09
158	PUEBLO 2103489964	2.20	Vegetation routine patrol Vegetation hazard patrol	2.20	Vegetation routine patrol Vegetation hazard patrol	2.20	Vegetation routine patrol Vegetation hazard patrol	2.20
159	CALAVERAS CEMENT 11011419	2.19	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.78	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.76	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.13
160	ELECTRA 11017104	2.18	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.79	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.76	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.73

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
161	MARIPOSA 2102851902	2.18	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.81	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.80	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.79
162	OAKLAND K 1102172340	2.15	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.76	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.75	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.74
163	SILVERADO 2105990552	2.15	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.74	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.73	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.72
164	PLACERVILLE 2106CB	2.14	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.85	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.83	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.82

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[a]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
165	VACAVILLE 110838316	2.14	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.78	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.77	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.75
166	RINCON 1103472	2.14	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.09	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.09	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	2.08
167	STELLING 1110568350	2.13	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.74	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.43	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.24
168	ALLEGHANY 1101806	2.12	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.73	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.63	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.13

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
169	PIT NO 3 2101CB	2.11	EPSS Vegetation routine patrol Vegetation hazard patrol	0.74	EPSS Vegetation routine patrol Vegetation hazard patrol	0.74	EPSS Vegetation routine patrol Vegetation hazard patrol	0.74
170	FORESTHILL 110150486	2.11	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.84	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.82	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.79
171	VACAVILLE 1108922767	2.11	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.02	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.02	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.02
172	SILVERADO 2104CB	2.10	Vegetation routine patrol Vegetation hazard patrol	2.10	Vegetation routine patrol Vegetation hazard patrol	2.10	Vegetation routine patrol Vegetation hazard patrol	2.10

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
173	RINCON 1102CB	2.08	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.99	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.98	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.98
174	PARADISE 1105878870	2.07	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.21	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.19	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.17
175	SHADY GLEN 1101941844	2.06	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.93	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.92	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.44

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[a]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
176	PUTAH CREEK 110267858	2.06	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.77	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.39	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.34
177	PIKE CITY 1102CB	2.05	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.76	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.38	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.33
178	FRENCH GULCH 1101CB	2.04	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.78	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.78	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.78

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
179	MIDDLETOWN 1101614	2.03	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.24	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.22	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.20
180	BONNIE NOOK 1101CB	2.02	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.61	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.59	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.56
181	COALINGA NO 2 11059260	2.02	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.71	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.67	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.64
182	CLAYTON 2212614950	2.02	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.70	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.68	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.62

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
183	PUEBLO 110247720	2.01	Vegetation routine patrol Vegetation hazard patrol	2.01	Vegetation routine patrol Vegetation hazard patrol	2.01	Vegetation routine patrol Vegetation hazard patrol	2.01
184	NOTRE DAME 11042028	2.01	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.39	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.39	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.38
185	CLAYTON 2212334476	2.00	EPSS Vegetation routine patrol Vegetation hazard patrol	1.36	EPSS Vegetation routine patrol Vegetation hazard patrol	1.36	EPSS Vegetation routine patrol Vegetation hazard patrol	1.36
186	SUNOL 1101298061	1.99	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.73	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.72	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.71

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
187	MOUNTAIN QUARRIES 21011130	1.99	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.75	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.48	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.31
188	RINCON 1104786782	1.98	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.74	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.74	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.73
189	GARCIA 0401CB	1.98	EPSS Vegetation routine patrol Vegetation hazard patrol	0.69	EPSS Vegetation routine patrol Vegetation hazard patrol	0.69	EPSS Vegetation routine patrol Vegetation hazard patrol	0.69
190	DUNBAR 1103799422	1.96	EPSS Vegetation routine patrol Vegetation hazard patrol	0.75	Overhead hardening EPSS Vegetation routine patrol Vegetation hazard patrol	0.72	Undergrounding EPSS Vegetation routine patrol Vegetation hazard patrol	0.13

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
191	VACAVILLE 1104293462	1.96	EPSS Vegetation routine patrol Vegetation hazard patrol	0.74	Overhead hardening EPSS Vegetation routine patrol Vegetation hazard patrol	0.37	Undergrounding EPSS Vegetation routine patrol Vegetation hazard patrol	0.34
192	HARTLEY 1101698	1.95	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.67	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.44	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.31
193	PUTAH CREEK 1105665952	1.95	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.73	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.73	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.71

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
194	SILVERADO 2104632	1.95	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.48	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.46	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.43
195	SILVERADO 2105CB	1.94	EPSS Vegetation routine patrol Vegetation hazard patrol	1.86	EPSS Vegetation routine patrol Vegetation hazard patrol	1.86	EPSS Vegetation routine patrol Vegetation hazard patrol	1.86
196	TEJON 1102732836	1.93	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.66	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.31	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.29
197	CAMP EVERS 2104189010	1.93	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.64	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.63	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.63

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
198	APPLE HILL 110497086	1.92	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.71	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.60	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.10
199	CALISTOGA 1101730666	1.91	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.67	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.66	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.65
200	WEST POINT 110236676	1.91	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.69	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.58	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.11

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[a]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
201	KONOCTI 1102714370	1.91	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.69	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.66	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.22
202	SILVERADO 2104806500	1.90	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.60	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.60	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.60
203	STILLWATER 11021466	1.90	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.78	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.76	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.14

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
204	PIT NO 3 21011480	1.89	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.66	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.66	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.66
205	NARROWS PH 1151CB	1.88	EPSS Vegetation routine patrol Vegetation hazard patrol	0.66	Overhead hardening EPSS Vegetation routine patrol Vegetation hazard patrol	0.35	Undergrounding EPSS Vegetation routine patrol Vegetation hazard patrol	0.33
206	WILDWOOD 11011454	1.88	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.66	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.66	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.66
207	PINE GROVE 1101CB	1.88	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.76	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.51	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.35

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
208	REDBUD 1101323962	1.88	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.86	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.85	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.84
209	PLACERVILLE 21069712	1.87	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.71	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.71	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.14
210	CLARKSVILLE 2106CB	1.87	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.82	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.82	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.82

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
211	WOODACRE 1102851	1.87	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.90	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.88	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.20
212	SARATOGA 1107667000	1.87	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.67	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.66	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.65
213	ELECTRA 1101CB	1.86	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.68	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.41	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.25

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
214	MARIPOSA 2101439030	1.86	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.63	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.62	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.60
215	ANTLER 11011376	1.86	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.68	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.35	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.30
216	FRENCH GULCH 11011464	1.85	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.64	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.55	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.55
217	ALTO 11221260	1.85	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.64	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.61	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.09

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
218	RINCON 1104CB	1.85	Vegetation routine patrol Vegetation hazard patrol	1.85	Vegetation routine patrol Vegetation hazard patrol	1.85	Vegetation routine patrol Vegetation hazard patrol	1.85
219	TEJON 11023751	1.85	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.76	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.67	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.61
220	RINCON 1102640	1.84	Vegetation routine patrol Vegetation hazard patrol	1.84	Vegetation routine patrol Vegetation hazard patrol	1.84	Vegetation routine patrol Vegetation hazard patrol	1.84
221	CLARK ROAD 110247006	1.84	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.81	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.80	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.80

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
222	VACAVILLE 11046542	1.84	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.41	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.40	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.40
223	BIG BEND 1101641808	1.84	Line removal Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.72	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.71	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.69
224	PIT NO 5 11011658	1.83	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.63	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.62	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.27

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
225	REDBUD 1101754544	1.83	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.65	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.65	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.64
226	PIKE CITY 1101417084	1.83	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.44	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.44	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.33
227	BEAR VALLEY 2105CB	1.82	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.34	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.34	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.34

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
228	CALAVERAS CEMENT 110147968	1.80	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.64	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.64	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.12
229	EL DORADO PH 210219562	1.79	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.85	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.83	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.82
230	DUNLAP 1103CB	1.79	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.63	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.62	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.61
231	RINCON 1103649194	1.78	Vegetation routine patrol Vegetation hazard patrol	1.78	Vegetation routine patrol Vegetation hazard patrol	1.78	Vegetation routine patrol Vegetation hazard patrol	1.78

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
232	SANTA YNEZ 1102320270	1.78	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.62	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.60	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.34
233	EL DORADO PH 2102927014	1.78	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.98	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.98	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.98
234	FORESTHILL 1102359542	1.78	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.24	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.23	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.23

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
235	MIDDLETOWN 1101548	1.77	Line removal Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.71	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.57	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.24
236	CLOVERDALE 110282888	1.77	Vegetation routine patrol Vegetation hazard patrol	1.77	Vegetation routine patrol Vegetation hazard patrol	1.77	Vegetation routine patrol Vegetation hazard patrol	1.77
237	BIG BEND 1102884340	1.76	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.35	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.34	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.33
238	STANISLAUS 1701CB	1.76	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.55	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.53	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.48

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
239	COLUMBIA HILL 11012212	1.76	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.67	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.65	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.34
240	MOLINO 1102318	1.75	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.60	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.58	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.55
241	LAURELES 111110141	1.75	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.62	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.60	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.57

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
242	LAYTONVILLE 1101518	1.73	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.61	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.59	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.27
243	SHADY GLEN 11012768	1.73	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.57	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.56	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.55
244	LARKIN (Y) 1127CB	1.73	Vegetation routine patrol Vegetation hazard patrol	1.73	Vegetation routine patrol Vegetation hazard patrol	1.73	Vegetation routine patrol Vegetation hazard patrol	1.73

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
245	SHADY GLEN 1101898212	1.73	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.14	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.14	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.14
246	EL DORADO PH 2102CB	1.73	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.79	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.19	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.16
247	WEST POINT 11021305	1.72	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.61	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.59	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.11

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
248	PLACERVILLE 2106935216	1.72	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.10	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.08	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.06
249	PIT NO 7 1101CB	1.71	EPSS Vegetation routine patrol Vegetation hazard patrol	0.59	EPSS Vegetation routine patrol Vegetation hazard patrol	0.59	EPSS Vegetation routine patrol Vegetation hazard patrol	0.59
250	MIDDLETOWN 11011314	1.70	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.87	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.23	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.22
251	ELK 1101CB	1.70	EPSS Vegetation routine patrol Vegetation hazard patrol	0.61	EPSS Vegetation routine patrol Vegetation hazard patrol	0.61	Overhead hardening EPSS Vegetation routine patrol Vegetation hazard patrol	0.57

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
252	DUNBAR 1103234	1.69	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.78	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.76	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.75
253	ANTLER 1101484276	1.69	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.59	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.59	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.29
254	BEAR VALLEY 21059480	1.69	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.41	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.41	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.27

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
255	COVELO 1101516510	1.68	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.58	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.58	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.58
256	COALINGA NO 2 1105897858	1.68	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.63	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.63	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.63
257	FROGTOWN 17011623	1.67	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.58	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.56	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.54
258	SALT SPRINGS 21023118	1.67	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.58	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.55	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.52

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
259	MARIPOSA 2101CB	1.67	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.63	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.63	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.62
260	SAN RAFAEL 11011250	1.66	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.57	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.56	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.56
261	GEYSERVILLE 1102904170	1.66	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.65	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.65	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.33

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
262	CLAYTON 2212204416	1.66	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.61	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.60	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.12
263	SO. CAL. EDISON #3 1101CB	1.65	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.57	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.56	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.25
264	ORO FINO 1101CB	1.65	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.96	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.95	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.93

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
265	MOUNTAIN QUARRIES 2101979598	1.65	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.64	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.64	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.35
266	DUNBAR 1103160	1.64	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.58	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.58	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	1.58
267	FORESTHILL 11011802	1.64	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.73	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.25	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.23

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
268	STANISLAUS 17026028	1.64	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.65	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.63	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.60
269	MONTE RIO 1113CB	1.64	EPSS Vegetation routine patrol Vegetation hazard patrol	0.63	EPSS Vegetation routine patrol Vegetation hazard patrol	0.61	Overhead hardening EPSS Vegetation routine patrol Vegetation hazard patrol	0.45
270	CHALLENGE 1102CB	1.64	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.68	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.66	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.23

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
271	SILVERADO 2104633600	1.63	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.69	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.69	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.34
272	CORDELIA 111240402	1.63	Vegetation routine patrol Vegetation hazard patrol	1.63	Vegetation routine patrol Vegetation hazard patrol	1.63	Vegetation routine patrol Vegetation hazard patrol	1.63
273	WEST POINT 110112256	1.62	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.64	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.36	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.34

TABLE 6-4B:
SUMMARY OF RISK REDUCTION FOR TOP RISK CIRCUITS BY RISK-PER-MILE FOR CRITICAL ISSUE RN-PGE-26-02[(a)]
(CONTINUED)

Line No.	Circuit Segment Name	Initial Overall Utility Risk	2026 Activities	2026 Overall Utility Risk	2027 Activities	2027 Overall Utility Risk	2028 Activities	2028 Overall Utility Risk
274	GIRVAN 11011330	1.60	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.66	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.64	Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.18
275	EL DORADO PH 210119752	1.60	Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.65	Overhead hardening Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.51	Overhead hardening Undergrounding Pole clearing EPSS Vegetation routine patrol Vegetation hazard patrol	0.34

(a) Adjusted in response to Critical Issues RN-PGE-26-02.