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Via Office of Energy Infrastructure Safety E-Filing

Caroline Thomas Jacobs, Director
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Re: PG&E Comments on Final Independent Evaluator Annual Report on Compliance for PG&E's 2024 Wildfire Mitigation Plan (Docket No. 2025-IE)

Dear Director Thomas Jacobs:

Pacific Gas and Electric Company (PG&E) offers these comments on the Final Independent Evaluator Annual Report on Compliance for PG&E's 2024 Wildfire Mitigation Plan (IE Report) from Bureau Veritas North America, Inc. (BVNA or the IE).

1. Executive Summary

We appreciate the significant effort that BVNA put into preparing this report and assessing the work performed as part of our 2024 Wildfire Mitigation Plan (WMP). In performing its audit, BVNA reviewed publicly available documents, as well as other detailed PG&E data available for each WMP initiative. Fifteen initiatives were subject to “focused” sampling from the 2024 WMP year for a more robust analysis. BVNA made several observations in the IE Report, and we view each of these findings as an opportunity to continue improving our wildfire mitigation efforts.

The IE Report documents our continued progress in the performance of our wildfire mitigation work. We are encouraged by BVNA's conclusion that, “PG&E has demonstrated a strong commitment to the WMP and has made significant progress in achieving the objectives and goals outlined for 2024.”¹ We are proud that BVNA concluded that “[t]hrough their actions and the evidence provided, PG&E has shown that they are dedicated to mitigating wildfire risk through their implementation of initiatives across all five categories of the WMP.”²

We continue to develop strong working relationships with regulators, communities, other utilities, and industry experts to better understand and mitigate wildfire risk and work hard to instill a sense

¹ IE Report (Jun. 30, 2025) at 127.

² *Id.* at 127.

of urgency in all our wildfire mitigation efforts. Therefore, we appreciate BVNA’s observation that “reportable ignitions in the High Fire-Threat Districts (HFTDs) and High Fire Risk Areas (HFRAs) within PG&E’s overall service area was reduced by [the] outcomes of initiatives such as Public Safety Power Shutoff (PSPS) and Undergrounding.”³

BVNA also acknowledged that our “2024 WMP builds on lessons learned from previous years, utilizing statistical data and detailed analysis of mitigation measures and it continues to strive to improve their efforts to reduce wildfire ignition risk by enhancing existing programs and implementing new technologies.”⁴

After conducting a detailed review of our 2024 WMP activities, BVNA found that we met “initiative validation” for all 47 initiatives in the 2024 WMP year. BVNA additionally stated we exceeded several of our target goals in the 2024 WMP year, demonstrating the effectiveness of our mitigation strategies.⁵

In the IE Report, BVNA did not find any instances of non-compliance in our 2024 WMP. However, BVNA identified areas of concern in a few initiatives that BVNA determined did not rise to the level of potential non-compliance. We view these findings as areas for continued improvement and will work towards that progress. In Section 2 of this response, we explain the actions we are taking to respond to specific observations. Finally, in Section 3 of this response, we discuss additional information relating to the funding of our 2024 WMP highlighted in the IE Report.

2. Issues Raised in the IE Report

Despite BVNA’s findings not rising to the level of compliance issues, we are addressing or offering clarification of a number of these issues below. The majority of these findings represent an opportunity to improve communications or to offer additional support to address questions of findings as they arise during the audit.

a. GH-10 – Non-Exempt Expulsion Fuse – Removal – 8.1.2.10.5

In its evaluation of 89 location samples where field reviews were performed, BVNA found:

- One location specified as 30 ELF in GH-10 but had 25 ELF installed.⁶
- One location specified as 10E in GH-10 but has 20E installed.⁷

Comments

Location data was not provided to allow PG&E to investigate these findings. If a data request is submitted to PG&E with location specific details an investigation could be facilitated.

³ *Id.* at 10.

⁴ *Id.* at 9.

⁵ *Id.* at 9.

⁶ *Id.* at 40.

⁷ *Id.* at 40.

b. AI-07 - Detailed Ground Inspections - Distribution- 8.1.3.2.1

In its evaluation of 73 distribution pole inspections samples where aerial inspections were performed, BVNA found:

- The inspection reports lack photographic documentation, which limits the ability to verify the findings independently or assess the severity of any noted issues.⁸

Comments

This finding represents an area for us to provide better communication with BVNA in future audits. Though we do capture photo documentation during all aerial inspections, this documentation is not embedded in the inspection record but is maintained in a separate system. This documentation is available and can be provided to the IE during future audits.

c. GM-06 - EPSS – Down Conductor Detection (DCD)- 8.1.2.10.1

In its evaluation of 83 DCD installation samples where field review was performed, BVNA found:

- One structure had a non-functional DCD unit (182611108-R08), likely taken out of service due to damage occurring in 2025.⁹
- During the evaluation of device (182611108-R08), the IE found open cutouts, an open switch, and a disconnected jumper on the ‘A’ phase of the DCD. Historical imagery via Google Earth indicated the device was previously functional and intact before January 2025.¹¹

Comments

R08 is a normal open between Paso Robles 1108 and Templeton 2109. This equipment was assessed as having bad bushing(s) in February 2025. It is presently on Critical Operating Equipment (COE) notification for replacement PM 35640681, with construction dates in November 2025. Two installations were found with missing caps on one (152271102-465074) or more lightning arresters (182611104-913884), which appeared to have detached after initial installation.¹⁰

These observations noted in second bullet are not associated with the GM-06 initiative. Based on the documentation provided, PG&E is unable to determine if these conditions warrant corrective action. These are not conditions that would be corrected during routine GO 165 inspections unless evidence is found indicating damage to the installations. These represent opportunities to improve communications and offer additional support to address questions of findings as they arise during the IE audit.

⁸ *Id.* at 25.

⁹ *Id.* At 45.

¹⁰ *Id.* At 45.

3. WMP Funding

BVNA assessed the funding activity for our 2024 WMP.¹¹ The IE Report focused on specific areas where BVNA noted that the amount of funding spent was lower than the forecasted amount in 47 initiatives. In response to BVNA's requests, we provided additional written details for specific items and met with BVNA to discuss our cost model. Though BVNA did not note any instances of non-compliance in the amount of funding spent, we wanted to highlight some of the details around the WMP funding. The analysis performed as part of the IE audit is a variance analysis illustrating how the assumptions around work plan and unit cost drivers made when preparing the 2024 WMP compared to the actual drivers that factored into the 2024 recorded spend. Although differences in spending can indicate that we did not use all our resources to meet the initiatives PG&E set forth, the differences were driven by financial and work plan factors. These factors include efficiencies in work performance, favorable environmental conditions, timing, strategy, risk assessment, and lower unit costs. Our ability to meet all 47 targets and objectives this year is a clear representation of favorable cost reductions within some of our initiatives, given the differences in spending on other initiatives.

Overall, we would like to note that PG&E spent approximately \$2.7 billion on wildfire mitigation work as part of our 2024 WMP, which was more than the approximately \$2.6 billion that we forecasted, or a 3.6% increase from the forecast to the actual spending.¹² For some initiatives, PG&E came in under budget and realized savings, and will continue to find efficiencies wherever possible, but never at the cost of program effectiveness or the ability to meet a target.

4. Conclusion

We are pleased that BVNA's overall findings demonstrate our commitment to wildfire mitigation. We take seriously the report's conclusions and have provided additional details to address the specific issues raised. We look forward to continuing our work with Energy Safety and the Independent Evaluator to achieve our goal to end catastrophic wildfires.

Very truly yours,

/s/ Daniel Kushner

Daniel Kushner, PhD

¹¹ *Id.* at 11-21.

¹² *Id.* at 11-12.