

April 18, 2025

BY ELECTRONIC COMMUNICATION

Electric Safety Policy Division  
Office of Energy Infrastructure Safety (Energy Safety)  
California Natural Resources Agency  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

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

Electric Safety Policy Division:

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

The errata changes are as follows:

- Attachment 1: Table of identified substantive errata including narrative updates and corrections, table updates, and risk score corrections.
- Attachment 2: Updated Table 3-3: Summary of Projected WMP Expenditures (Thousands of Dollars)
- Attachment 3: Updated Table 5-1: Risk Modeling Assumptions and Limitations
- Attachment 4: Updated Table 8-1: Grid Design, Operation, and Maintenance Targets By Year
- Attachment 5: Updated Table 9-2: Vegetation Inspections and Pole Clearing By Year
- Attachment 6: Updated Table 9-6: Vegetation Management QA and QC Activity

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

Sincerely

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Jay Leyno  
Director, Wildfire Mitigation PMO

**Attachment 1**

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

|   | Issue/Reason for Correction  | Location of Issue in the 2026-2028 WMP   | Adjustment(s) Made  |
|---|--|--|---|
| 1 | 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.<br><br>See Attachment 2 Below  |
| 2 | 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                    | <del>Starting in January 2023, PG&amp;E incorporated additional customers who could be impacted into the PSPS consequence model and classified them as Potentially Impacted Customers (PIC). PG&amp;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.</del> |
| 3 | 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 <del>two inputs:</del> a historical PSPS event lookback. <b>For the 2026 WMP and 2027 GRC filing, PG&amp;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.</b>  |
| 4 | 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. 79-80                 | Replaced with updated table after removal of PIC language.<br><br>See Attachment 3 Below  |
| 5 | Footnote added to clarify- 23% "Activity-Effectiveness-Outage Program Risk" reduction  | Table 6-3: Risk Impact of Activities, P. 151                                   | Added additional footnote (e):<br><br><b>Covered Conductor is estimated to be approximately 52% effective in mitigating EPSS outages but has no impact on PSPS planned outages. The</b>   |

|    | Issue/Reason for Correction  | Location of Issue in the 2026-2028 WMP                                     | Adjustment(s) Made   |
|----|--|--|--|
|    | impact for Covered Conductor Installation  |  | resulting blended average effectiveness for Outage Program (defined as PSPS and EPSS) risk is 23%.   |
| 6  | Footnote added to clarify- 100% "Activity-Effectiveness-Outage Program Risk" reduction impact for Undergrounding | Table 6-3: Risk Impact of Activities, P. 151                               | Added additional footnote (f):<br><br>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. |
| 7  | 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. 175 | Replaced Table 8-1 with updated risk scores. The changes are reflected in column "% Risk Reduction for (year)."<br><br>See Attachment 4 below.   |
| 8  | Footnote added for clarity   | Table 8-1: Grid Design, Operation, And Maintenance Targets By Year, P. 176 | Added additional footnote (b):<br><br>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.<br><br>See Attachment 4 below.   |
| 9  | Table updated reflect correct HFTD %   | Table 9-2: Vegetation Inspections And Pole Clearing By Year, P. 356        | Replaced table with updated %. The changes are reflected in column % HFTD Covered in 2026.<br><br>See Attachment 5 Below   |
| 10 | Table summary updated to include   | Table summary for Table 9-6: Vegetation                                    | VMQA and VMQC program targets are summarized in Table 9-6 below.   |

|  | Issue/Reason for Correction          | Location of Issue in the 2026-2028 WMP | Adjustment(s) Made   |
|--|--------------------------------------|--|--|
|  | HFTD/HFRA/Buffer Zone area language. | Management QA and QC Activity, P. 409  | <ul style="list-style-type: none"> <li>• Reporting: PG&amp;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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul> |

|    | <b>Issue/Reason for Correction</b>   | <b>Location of Issue in the 2026-2028 WMP</b>               | <b>Adjustment(s) Made</b>   |
|----|--|---|---|
| 11 | Table update to include HFTD/HFRA/Buffer Zone area language and updated population size. | Table 9-6: Vegetation Management QA and QC Activity, P. 410 | Replaced Table 9-6 to include HFTD/HFRA/Buffer Zone area language and updated population size.<br><br>See Attachment 6 below. |

## Attachment 2

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

| Year | Projected Spend                       |
|------|---------------------------------------|
| 2026 | <del>\$5,513,330</del><br>\$5,516,713 |
| 2027 | <del>\$6,449,108</del><br>\$6,149,631 |
| 2028 | <del>\$6,912,424</del><br>\$6,626,139 |

Attachment 3

Table 5-1: Risk Modeling Assumptions And Limitations

| Assumption  | Rationale/Justification  | Limitation   | Applicable Model  |
|---|--|--|---|
| It is assumed that events from June-November, the typical timing of fire seasons, are representative of all events capable of producing wildfire risk                                       | If the training data for the WDRM included events caused by winter storms, icing, and other causal processes not compatible with ignition and wildfire spread, the pattern of model predictions would be influenced by events that contribute little or no wildfire risk. To avoid exposing the model to misleading data, the training events are restricted to June through November. | We assume that wildfires are possible outside of the typical fire season and that ignitions and wildfires occurring outside of the typical fire season would have the same relationship with the model covariates as the ones the model is already trained on. | Overall Utility Risk<br>Ignition/Wildfire Risk (WDRM/WTRM)<br>Ignition Likelihood<br>Ignition/WFC<br>Equipment Likelihood of Ignition<br>Contact from Object Likelihood of Ignition |
| The WDRM v4 is an “observational model” that uses the pattern of past outages and ignitions to predict their future.  | The core assumption of such an approach is that the correlations and causal processes that have governed past outages and ignitions will continue to govern them in the future.  | N/A  | WDRM<br>Ignition Likelihood<br>Equipment Likelihood of Ignition<br>Contact from Object Likelihood of Ignition   |
| ML tools, like feature generation, model regularization, and the preferential use of out of sample performance metrics, are well suited to the prediction of ignition probability and risk. | The key features of the ML tools are the primary output of the WDRM v4.  | N/A  | Ignition/Wildfire Risk (WDRM)<br>Ignition Likelihood<br>Equipment Likelihood of Ignition<br>Contact from Object Likelihood of Ignition  |

| Assumption   | Rationale/Justification  | Limitation   | Applicable Model   |
|--|--|--|--|
| WTRM builds on assumptions used by the Transmission Operational Assessment (OA) Model. PG&E identified 47 components through a Failure Modes and Effects Analysis which could result in a wildfire ignition if they failed. These 47 components were divided into 9 asset groups and asset specific datasets are assigned to each one. | While the scope of the WTRM exceeds that of the OA Model in terms of incorporating other hazards, the asset group types remain a proxy for a collection of components that share similar: (1) life cycles, (2) sensitivities to threats and hazards, and (3) Asset Management strategies.  | N/A  | Ignition/Wildfire Risk (WTRM v2)   |
| Where age data is unavailable from system of records, a logic is used to determine the most conservative age of the asset.   | Age data is required for each component for the WTRM to compute an annual failure rate.  | Some equipment risk could potentially be overestimated due to equipment using assumed age.   | Ignition/Wildfire Risk (WTRM v2)   |
| <del>The inclusion of “PICs Analysis” does not change the overall PSPS MAVF Risk Score.</del>  | <del>While a large set of customers are being included as having PSPS impact, when calibrating the PSPS Risk Score in terms of MAVF, the overall risk is represented by historical performance. As such, all customers see a smaller contribution to the overall risk score, in which the overall risk scores do not change.</del> | <del>Additional scenarios being considered have no impact to the overall PSPS MAVF risk score.</del>   | <del>PSPS Risk</del><br><del>PSPS Consequence</del><br><del>PSPS Likelihood</del><br><br><del>Vulnerability of Community to PSPS</del> |
| Circuits operating outside their rated capacity or in abnormal configuration do not have an increased ignition risk.   | In July 2024 during an intense heat event, PG&E saw a significant uptick in fire risk exposure and associated ignition events. PG&E did an analysis that found that conductors and connectors under high heat stress, both external (due to extended heat) and internal (due to load) could be one of the contributing factors.    | While the distribution (WDRM v4) probability of failure model does include the risk for abnormal circuits, it does not currently identify circuits that are operating within the rated capacity and circuits that are operating outside their rated capacity or circuits in abnormal configuration. PG&E is currently investigating if there is a correlation between circuit condition and higher outage and ignition events. PG&E is collecting data to determine the degree of risk introduced by circuit configuration in the HFTD/HFRA. | WDRM v4  |



| Assumption   | Rationale/Justification   | Limitation  | Applicable Model   |
|--|---|---|--|
| <del>“Potentially impacted customers” (PIC) is created as a 1 in 13-year frequency. Outage Duration is based on average outage duration from “12-year PSPS lookback”.</del>  | <del>“Potentially impacted customers” inherently do not show up in the “12-year PSPS lookback.” As such, the frequency of an event is 1-year exceeding PG&amp;E’s lookback period to capture the potential for additional customers to be impacted. This is to capture the non-zero PSPS risk tied to customers that do not show up on the lookback.</del>  | <del>The accuracy of the PICs is based on the 12-year lookback data.</del>  | <del>PSPS Risk<br/>PSPS Consequence<br/>PSPS Likelihood<br/>Vulnerability of Community to PSPS</del> |
| Critical Customer Weightings are based on high level SME judgement.  | The assignment of a critical weighting factor to our customers is a subjective process that will continually be reviewed and potentially updated. There has been limited industry research and therefore no industry standard on how different customers are impacted by PSPS events or loss of power. PG&E will continue to work with the industry and Investor-Owned Utility (IOU) partners to better reflect customer risks in our PSPS consequence model. The current weighting system was developed internally to provide a simple differentiation of customer category types. | The distribution of customer risk (and PSPS risk reduction) is partly driven by the type of customers and their critical weighting score. Significant changes to the critical customer weighting could potentially impact Circuit Protection Zone risk ranking and prioritization initiatives | PSPS Risk<br>PSPS Consequence<br>PSPS Likelihood<br>Vulnerability of Community to PSPS               |
| <p>PSPS safety consequence is based off 50 percent PG&amp;E PSPS planned and 50 percent unplanned long duration outages across the United States (U.S.)</p> <p>Safety accounts for 50 percent of our MAVF PSPS Risk. PSPS events are relatively new and there is minimal SIF data to include in the risk analysis. For this reason, other large external national events (i.e., 2003 NE Blackout, 2011 SW Blackout, 2012 Superstorm Sandy, etc.) were considered in evaluating safety risks associated with PSPS events.</p> | PSPS represented as a non-zero safety risk is reasonable. However, PG&E providing advanced notification for a planned de-energization reduces the safety impact of the outage and should not be treated as an unplanned outage. Given that historical records show no safety impacts, PG&E included unplanned long duration outages across the U.S. (i.e., 2033 NE Blackout, 2011 SW Blackout, 2012 Superstorm Sandy, etc.) at 50 percent, respectively.  | The safety consequence of PSPS should not include unplanned outages as it does not accurately represent PSPS itself.  | PSPS Risk<br>PSPS Consequence<br>PSPS Likelihood<br>Vulnerability of Community to PSPS               |
| EPSS Consequence assumes that the duration will be the same for outages that occur both with and without EPSS enabled.   | Analysis of outages supports the expectation that the duration of an outage will be the same whether or not EPSS is enabled.  | As future operational EPSS data becomes available, analysis may discover differences in duration for EPSS enabled outages   | EPSS Risk<br>EPSS Consequence  |

| Assumption  | Rationale/Justification   | Limitation  | Applicable Model                     |
|---|---|---|--------------------------------------|
| EPSS Likelihood of a fault is independent of whether or not EPSS is enabled.  | No known causal mechanism that would cause the fault rate to change when EPSS is enabled.   | As future operational EPSS data become available a causal mechanism may be discovered.  | EPSS Risk<br>EPSS Likelihood         |
| EPSS Value of Service (VOS) is specific to customer class based on the outputs of the interruption cost estimation calculator   | Interruption cost estimation calculator inputs are based on PG&E customer characteristics and historic SAIFI, SAIDI, CAIDI metrics  | VOS is based on 2016 data, escalated to 2024 values   | EPSS Risk<br>EPSS Consequence        |
| Baseline Risk in the Enterprise Wildfire Risk Model is calibrated to historical performance.  | Baseline wildfire risk needs to be calibrated against all other risks within the Company. As such, historical years' performance is used to calculate risk score              | Changes in wildfire risk has been dynamic. Baseline risk scores based on historical performance may not be reflective of current performance. | Enterprise Risk Model <sup>(a)</sup> |
| The FPI and IPW models are observational models that learn the pattern of historical fires, outages, and ignitions together with the conditions under which they occurred to predict future fires, outages, and ignitions.  | The rationale of such an approach is that the correlations and causal processes that drive historical fires, outages and ignitions will continue to drive them in the future. | Fires, ignitions and outages of the future may be driven by processes that have not been accounted for in the models.                         | FPI/IPW <sup>(b)</sup>               |
| The FPI and IPW models are driven predominantly by weather model forecasts.   | Weather is an important driver of fires, outages, and ignitions.  | Weather model forecasts, while skillful and well validated, are not a perfect representation of the future state of the atmosphere.           | FPI/IPW <sup>(b)</sup>               |
| ML methods, such as feature creation, classification and regression, model sampling, and use of the out of sample performance metrics, are well suited to the prediction of fire, outage, and ignition probability and risk.  | The rationale of ML is that it allows the skillful explanation of future fires, outages, and ignitions by using large amounts of data and sophisticated algorithms.           | ML models are limited by the amount of data available and the sophistication of the current state-of-the-art algorithms.                      | FPI/IPW <sup>(b)</sup>               |
| <div><div></div><div>(a) The Enterprise Risk Model is used to calibrate all the wildfire, PSPS, and EPSS risk models listed in <a href="#">Table 5-4</a> above for the purpose of calculating overall utility risk.</div><div>(b) The FPI/IPW models are operational models and, therefore, do not appear in <a href="#">Table 5-4</a> below.</div></div> |   |   |                                      |

Attachment 4

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 | 3-Year Total | Section; Page Number              |
|--|------------------------------------|---|--------------------------------------|-------------------------|---------------------|----------------------------|----------------------------|---------------------------|---------------------|----------------------------|---------------------------|---------------------------|------------------------------|----------------------------|------------------------|---------------------------|--------------|-----------------------------------|
| Grid Design, Operations, and Maintenance | Quantitative (Quarterly)           | Detailed Inspection - Transmission (AI-04)                            | AI-04                                | Transmission Structures | 22,000              | 97%                        | 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       | <a href="#">8.3.1</a> ; p. 228    |
| Grid Design, Operations, and Maintenance | Quantitative (Quarterly)           | Infrared Inspections - Transmission (AI-06)                           | AI-06                                | Circuit miles           | 2,500               | 95%                        | 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        | <a href="#">8.3.3</a> ; p. 231    |
| Grid Design, Operations, and Maintenance | Quantitative (Quarterly)           | Detailed Inspections - Distribution (AI-07) (a)                       | AI-07                                | Distribution Poles      | 218,441             | 99%                        | 100%                       | 31.03% (Eyes on Risk)     | 218,441             | 98.7%                      | 100%                      | 31.03% (Eyes on Risk)     | 218,441                      | 98.7%                      | 100%                   | 31.03% (Eyes on Risk)     | 655,323      | <a href="#">8.3.8</a> ; p. 236    |
| Grid Design, Operations, and Maintenance | Quantitative                       | System Hardening - Undergrounding (GH-04)(b)                          | GH-04                                | Circuit Miles           | 370(b)(c)           | 97%                        | 97%                        | <del>1.9%</del> 1.4%      | 307                 | 96.8%                      | 97.1%                     | <del>2.7%</del> 2.2%      | 400(d)                       | 96.8%                      | 97.1%                  | <del>3.0%</del> 2.4%      | 1,077        | <a href="#">8.2.2</a> ; p. 197    |
| 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          | <a href="#">8.2.5.1</a> ; p. 204  |
| 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           | <a href="#">8.2.5.1</a> ; p. 204  |
| Grid Design, Operations, and Maintenance | Quantitative                       | Overhead Hardening and Line Removal - Distribution (GH-12)            | GH-01(de)                            | Circuit Miles           | 318                 | 100%                       | 100%                       | <del>1.8%</del> 1.2%      | 200                 | 100%                       | 100%                      | <del>1.5%</del> 1.1%      | 200                          | 100%                       | 100%                   | <del>1.1%</del> 0.8%      | 718          | <a href="#">8.2.1</a> ; p. 180    |
| 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          | <a href="#">8.2.13.1</a> ; p. 222 |

**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 | 3-Year Total | Section; Page Number              |
|--|------------------------------------|---|--------------------------------------|------------------------------|---|----------------------------|----------------------------|---------------------------|---|----------------------------|---------------------------|---------------------------|---|----------------------------|------------------------|---------------------------|--------------|-----------------------------------|
| 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/HFR A in 2025 | 100%                       | 99%                        | 0.6%                      | Close 153% of the count of EC notifications created in HFTD/HFR A from 2025 to 2026 | 100%                       | 99%                       | 0.6%                      | Close 160% of the count of EC notifications created in HFTD/HFR A from 2025 to 2027 | 100%                       | 99%                    | 0.6%                      | n/a          | <a href="#">8.6.2</a> ; p. 315    |
| 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          | <a href="#">8.7.1.1</a> ; p. 326  |
| 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        | <a href="#">8.2.10.6</a> ; p. 219 |
| 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          | <a href="#">8.8.1</a> ; p. 344    |

- (a) Please note that the %planned and %risk reduction account for detailed inspections only and not the aerial scan inspections also described in this section of the WMP.
- (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.
- (bc) 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 percent risk reduction target for 2023-2026 that is a requirement of PG&E's 2023 GRC decision (D.23-11-069, OP 22).
- (cd) PG&E is planning to file a 10-Year Electric Undergrounding Plan (EUP) with Energy Safety in 2025. Depending on when our EUP is approved, our forecast number of underground miles for 2028 may change from the amount shown here.
- (de) 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 have been updated for this 2026-2028 Base WMP removing undergrounding work, which is captured in GH-04. The target for the 2026 2028 Base WMP is now GH-12 and includes work associated with overhead distribution hardening (covered conductor installation) and line removal with remote grid for base system hardening work, fire rebuild work, and other work in the HFTD.

Attachment 5

Table 9-2: Vegetation Inspections And Pole Clearing By Year

| Activity<br>(Program)   | Tracking<br>ID | Previous<br>Tracking ID,<br>if applicable | Target Unit  | Cumulative<br>(Cml.)<br>Quarterly<br>Target<br>2026, Q1 | Cml.<br>Quarterly<br>Target<br>2026, Q2 | Cml.<br>Quarterly<br>Target<br>2026, Q3 | Cml.<br>Quarterly<br>Target<br>2026, Q4 | Cml.<br>Quarterly<br>Target<br>2027, Q1 | Cml.<br>Quarterly<br>Target<br>2027, Q2 | Cml.<br>Quarterly<br>Target<br>2027, Q3 | Cml.<br>Quarterly<br>Target<br>2027, Q4 | Cml.<br>Quarterly<br>Target<br>2028, Q1 | Cml.<br>Quarterly<br>Target<br>2028, Q2 | Cml.<br>Quarterly<br>Target<br>2028, Q3 | Cml.<br>Quarterly<br>Target<br>2028, Q4 | % HFTD<br>Covered<br>in 2026 | % Risk<br>Reductio<br>n for<br>2026 | % Risk<br>Reduction<br>for 2027 <sup>(a)</sup> | % Risk<br>Reduction<br>for 2028 <sup>(a)</sup> | Three-<br>Year<br>Total | Activity<br>Timeline<br>Target | Section;<br>Page<br>Number     |
|---|----------------|---|--|---|---|---|---|---|---|---|---|---|---|---|---|------------------------------|-------------------------------------|--|--|-------------------------|--------------------------------|--------------------------------|
| Pole Clearing<br>Program(b)   | VM-02          | VM-02                                     | Distribution<br>Poles                                    | 35,000  | 56,000                                  | 70,000                                  | 70,000                                  | 35,000                                  | 56,000                                  | 70,000                                  | 70,000                                  | 35,000                                  | 56,000                                  | 70,000                                  | 70,000                                  | 65.70%<br>8%                 | 0.10%                               | 0.10%  | 0.10%  | 210,000                 | 365 days                       | <a href="#">9.4</a> ; p. 378   |
| Substation<br>Inspections - Dis<br>tribution                        | VM-05          | VM-05                                     | Distribution<br>Substations                              | 58  | 122                                     | 130                                     | 130                                     | 58                                      | 122                                     | 130                                     | 130                                     | 58                                      | 122                                     | 130                                     | 130                                     | 97.60%<br>100%               | 53%<br>(Eyes on<br>Risk)            | 53% (Eyes<br>on Risk)                          | 53% (Eyes<br>on Risk)                          | 390                     | 274 days                       | <a href="#">9.6</a> ; p. 382   |
| Substation<br>Inspections –<br>Transmission                         | VM-06          | VM-06                                     | Transmission<br>Substations                              | –   | 53                                      | 55                                      | 55                                      | –                                       | 53                                      | 55                                      | 55                                      | –                                       | 53                                      | 55                                      | 55                                      | 100.00%                      | 23%<br>(Eyes on<br>Risk)            | 23% (Eyes<br>on Risk)                          | 23% (Eyes<br>on Risk)                          | 165                     | 274 days                       | <a href="#">9.6</a> ; p. 382   |
| Substation<br>Inspections –<br>Power<br>Generation                  | VM-07          | VM-07                                     | Power<br>Generation<br>Switchyards<br>and<br>Powerhouses | –   | 52                                      | 58                                      | 58                                      | –                                       | 52                                      | 58                                      | 58                                      | –                                       | 52                                      | 58                                      | 58                                      | 98.20%<br>100%               | 24%<br>(Eyes on<br>Risk)            | 24% (Eyes<br>on Risk)                          | 24% (Eyes<br>on Risk)                          | 174                     | 274 days                       | <a href="#">9.6</a> ; p. 382   |
| Routine<br>Transmission –<br>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                                  | 32.00%<br>100%               | 100%<br>(Eyes on<br>Risk)           | 100%<br>(Eyes on<br>Risk)                      | 100%<br>(Eyes on<br>Risk)                      | 52,500                  | 365 days                       | <a href="#">9.2.3</a> ; p. 368 |
| Transmission<br>Hazard Patrol<br>(Second Patrol,<br>Tree Mortality) | VM-14          | VM-14                                     | Circuit Miles  | –   | –                                       | –                                       | 5,625                                   | –                                       | –                                       | –                                       | 5,625                                   | –                                       | –                                       | –                                       | 5,625                                   | 100.00%                      | 100%<br>(Eyes on<br>Risk)           | 100%<br>(Eyes on<br>Risk)                      | 100%<br>(Eyes on<br>Risk)                      | 16,875                  | 365 days                       | <a href="#">9.2.4</a> ; p. 373 |
| Distribution<br>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                                  | 30.60%<br>100%               | 0.82%                               | 0.82%  | 0.82%  | 233,500                 | 365 days                       | <a href="#">9.2.1</a> ; p. 359 |
| Distribution<br>Hazard Patrol<br>(Second Patrol,<br>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                                  | 100.00%<br>39%               | 75.14%<br>(Eyes on<br>Risk)         | 75.14%<br>(Eyes on<br>Risk)                    | 75.14%<br>(Eyes on<br>Risk)                    | 30,000                  | 365 days                       | <a href="#">9.2.2</a> ; p. 364 |

(a) Estimates for the 2027 and 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) Please note targets will be adjusted as determined by inspections in the previous year and may additionally be impacted by changes to facilities or based on other utility risk mitigation reasons.

## Attachment 6

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

[illegible]

