

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

PG&E Data Request No.:	OEIS_001-Q016
PG&E File Name:	WMP-Discovery2026-2028_DR_OEIS_001-Q016
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Requester DR No.:	OEIS-P-WMP_2025-PGE-001
Requesting Party:	Office of Energy Infrastructure Safety
Requester:	Nathan Poon
Date Sent:	April 11, 2025

SUBJECT: REGARDING INTEGRATED VEGETATION MANAGEMENT REASSESSMENT AND TREATMENT TIMING

QUESTION 016

In Section 9.7.3 IVM Scheduling, PG&E states that, “For TIVM, previously worked ROWs are reassessed every 2-5 years” (p. 386). The 2026-2028 WMP does not described how the need for retreatment of Transmission ROWs is determined. In contrast, PG&E’s 2023-2025 WMP provided threshold triggers for retreatment of vegetation, including “incompatible vegetation exceeding 3 ft. in height and/or when incompatible vegetation is greater than 50 percent ground coverage within the ROW” (p. 695).

- a. Describe the rationale conducting reassessment inspection on a 2-5 year cycle and clarify what factors (e.g, species, growth rates, percent cover, height) were used to define this timeframe.
- b. Clarify the threshold triggers PG&E will use to determine the need for retreatment of vegetation in transmission ROWs during the 2026-2028 WMP cycle.

Answer 016

- a. Historically, the rationale for a 2 to 5-year cycle of reassessment was due to it being known that incompatible vegetation will regrow within that timeframe.

With the availability of LiDAR data, vegetation height and density conditions are analyzed each year. This data also allows for year-over-year growth analysis by span. The vegetation conditions are then used for work plan development using the inputs described below.

As stated in the 2026-2028 WMP, PG&E schedules Transmission IVM (TIVM) ROW maintenance based on outputs of the work plan development described in the program overview (see 9.7.1 pp. 384).

- b. The quantity of TIVM work varies by year and is dependent on the resources available. PG&E considers the following inputs to determine the need for retreatment of vegetation in transmission ROWs during work plan development:
- The year in which previous ROW expansion/ROW clearing project work was completed. Follow-up IVM maintenance is then typically targeted to occur within 1-5 years.
 - How many previous years of IVM maintenance have occurred on a line and when the last cycle of maintenance occurred. Follow-up IVM maintenance is then typically recommended to occur within 1-3, 3-5, or 5-7 years depending on other factors below.
 - Vegetation height and density (% cover of size classes at 6-12 feet, at 5-6 feet, and at 3-4 feet)
 - HFTD/HFRA Tiers and circuit mileage length
 - Agency and landowner commitments