

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

PG&E Data Request No.:	OEIS_001-Q003
PG&E File Name:	WMP-Discovery2026-2028_DR_OEIS_001-Q003
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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 VEGETATION MANAGEMENT QA AND QC TARGET PASS RATES

QUESTION 003

On page 410 of its 2026-2028 WMP, PG&E sets a target pass rate for Vegetation Management Quality Assurance (VMQA) of 97%. On page 411, PG&E writes that VMQA has a “99% estimated level of compliance.”

- a. How does PG&E use the “estimated level of compliance” in its operations?
- b. Explain why the estimated level of compliance differs from the target pass rate.

Answer 003

- a. The 99% estimated level of compliance is the predicted baseline score based on historic audit data. This estimated level of compliance is then entered into a sampling formula along with error rate and confidence level to derive an appropriate sample mileage. For 2025, we have been using between a 2.5% and 3.25% margin of error to account for variability in the audit sampling (since we aren’t looking at 100% of the line mileage in a given area). After the conclusion of the audit, we calculate the true margin of error since we’d have a collected grown-in tree population as a denominator at that point (this is because we use line mileage as a proxy for tree populations to get a minimum amount of mileage to review). At the conclusion of the audit, if the actual margin of error is less than the estimated margin of error used, the audit could be considered statistically valid. Basically, the margin of error would account for any outlier audits where the compliance score was well below 99%.
- b. Historical VMQA audit shows that system wide, scores average at or above 99% compliance. This is used strictly to derive audit mileage sample. The actual achieved pass rate is still a variable dependent on Operational Performance and independent of what VMQA expected to see. Using 99% as a baseline estimated level of compliance is consistent with the audit scores that QA has observed historically.