

May 1, 2025

OFFICE OF ENERGY INFRASTRUCTURE SAFETY OF THE CALIFORNIA NATURAL RESOURCES AGENCY

Subject:

Pacific Gas and Electric Company's Quarterly Notification Regarding the Implementation of Its Wildfire Mitigation Plan and Its Safety Recommendations; Submitted Pursuant to Public Utilities Code Section 8389(e)(7), the Office of Energy Infrastructure Safety's Compliance Operational Protocols, and Assembly Bill 1054

Pacific Gas and Electric Company (PG&E) respectfully submits this Quarterly Notification (1) the status of our current Wildfire Mitigation Plan (WMP): (2) recommendations of the most recent safety culture assessment: (3) recommendations of the Board of Directors' safety committee meetings that occurred during the quarter; and (4) a summary of the implementation of any safety committee recommendations from the previous quarterly submittal. This Quarterly Notification is provided pursuant to California Public Utilities Code (PUC) Section 8389(e)(7), the Office of Energy Infrastructure Safety's (Energy Safety) Compliance Operational Protocols, issued on February 16, 2021 (Compliance Operational Protocols) and subsequently clarified on September 8, 2021, by Energy Safety, and the 2024 Safety Certification Guidelines issued on June 19, 2024.1

## **Background**

On July 12, 2019, Governor Gavin Newsom signed Assembly Bill (AB) 1054 into law, adding Section 8389(e)(7) to the PUC. As one of the conditions for the issuance of a safety certification, Section 8389(e)(7) — as amended by AB 148 — requires documentation of the following:

The electrical corporation is implementing its approved wildfire mitigation plan. The electrical corporation shall file a notification of implementation of its wildfire mitigation plan with the office and an information-only submittal with the commission on a quarterly basis that details the implementation of both its approved wildfire mitigation plan and recommendations of the most recent safety culture assessments by the commission and office, and a statement of the recommendations of the board of directors safety committee meetings that occurred during the quarter. The notification and information-only submittal shall also summarize the implementation of the safety committee recommendations from the electrical corporation's previous notification and submission. If the office has reason to doubt the

Energy Safety issued "Submission of Safety Certification Request and Supporting Documents" on September 8, 2021, which, among other items, clarified Assembly Bill 148, effective as of July 22, 2021, updated PUC Section 8389(e)(7) to reporting requirements, notably that the Quarterly Advice Letter (QAL) would change in format, but not content, to the Quarterly Notification.

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veracity of the statements contained in the notification or information-only submittal, it shall perform an audit of the issue of concern. The electrical corporation shall provide a copy of the information-only submittal to the office.

On February 16, 2021, Energy Safety issued Compliance Operational Protocols which, in addition to the existing requirements established by Section 8389(e)(7), provide further guidance and requirements for electrical corporations' quarterly submissions. Specifically, the Compliance Operational Protocols standardize the quarterly submission dates across electrical corporations and describe the information and materials to be included in the Quarterly Notifications.

On December 14, 2022, Energy Safety issued new Data Guidelines with the 2023-2025 WMP Technical Guidelines. The Data Guidelines require the submission of a Quarterly Data Report (QDR), concurrent with the QN, and detailed initiative commitment progress in Table 1 of the QDR.

Additionally, and pursuant to the 2023 Safety Certification guidelines, PG&E is simultaneously submitting this quarterly notification to the California Public Utilities Commission as an information-only submittal to the following email address: <a href="mailto:safetypolicycentralfiles@cpuc.ca.gov">safetypolicycentralfiles@cpuc.ca.gov</a>.

This Quarterly Notification submission provides the requested information for the first quarter (Q1) of 2025, pursuant to the above-identified guidelines from Energy Safety and statutory requirements.

## **Q1 2025 Update**

### WMP Regulatory Background and Scope of Quarterly Notification

We submitted the initial version of our Base 2023-2025 WMP on March 27, 2023, and a corrected version on April 6, 2023.<sup>2</sup> A revision notice was issued by Energy Safety on June 22, 2023, and we submitted a revised WMP on August 7, 2023. On September 11, 2023, we submitted a request to Energy Safety to supplement our Revision Notice Response, which was granted on September 12, 2023. We submitted our Supplemental Revision Notice Response on September 27, 2023. We received final approval of our WMP on December 29, 2023, and submitted a revised 2023-2025 Base WMP on January 8, 2024.

We submitted our 2025 WMP Update on April 2, 2024. Energy Safety issued a decision on November 19, 2024, approving our 2025 WMP Update. The most recent version of our Base WMP (R8) was submitted on February 13, 2025, at the direction of Energy Safety.

Table 1 of our Q1 2025 Quarterly Template Workbook which is being submitted concurrently with this Quarterly Notification, provides progress updates for our 55 initiative

<sup>&</sup>lt;sup>2</sup> PG&E's 2023-2025 WMP is available at: www.pge.com/wildfiremitigationplan.

commitments, which include both targets and objectives.<sup>3</sup> This Quarterly Notification provides additional details associated with these initiative commitments.

## **2025 WMP Initiative Commitment Summary**

A table with all 55 initiative commitments, including the status of each, is provided in Appendix 1. A summary of the status of these initiative commitments, broken down by WMP category, is provided in Table 1 below. The Energy Safety guidelines indicate that five pre-designated status categories should be used for each initiative commitment.<sup>4</sup>

**Table 1: Summary of 2025 WMP Initiative Commitments** 

2023 WMP Category	Completed	In Progress	Planned	Delayed	Total
A. Situational Awareness and Forecasting	0	6	0	0	6
B. Grid Design, Operations and Maintenance	3	19	0	0	22
C. Vegetation  Management and Inspections	0	15	1	0	16
D. Public Safety Power Shut off	0	5	0	0	5
E. Emergency Preparedness Plan	0	4	0	0	4
F. Community Outreach and Engagement	0	2	0	0	2
Total	3	51	1	0	55

In addition to the categories listed above, we note the following about three of our initiatives:

PS-06 (Provide Portable Batteries to PG&E Customers): Our 2025 target for PS-06 is to provide 3,300 new or replacement portable batteries to PG&E customers. However, we currently estimate providing approximately 2,000 portable batteries and approximately 1,300 permanent batteries in 2025 in order to reach the WMP target of 3,300. Although our change order request on this topic was denied by Energy Safety on procedural grounds, we plan to continue with this effort to provide

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<sup>&</sup>lt;sup>3</sup> This total does not include five three-year objectives completed in 2023, four three-year objectives completed in 2024, and our fifteen ten-year objectives. Additionally, the total does not include 4 targets which were closed in 2023 or 2024.

<sup>&</sup>lt;sup>4</sup> Energy Safety's Data Guidelines V4, page 153 (indicating status should be: completed, in progress, planned, delayed, or canceled). Please note that there are no canceled initiatives, so we have not included a column for that status.

both permanent and portable batteries as part of this initiative because we believe it best meets the needs of our customers.<sup>5</sup>

- VM-07 (Defensible Space Inspections Hydroelectric Substations and Powerhouses): In 2025, similar to 2024, we will only inspect 58 locations instead of 61. This reduction is the result of the transfer in ownership of three substations. As with PS-06, we note that our request to update this target via the Change Order process was rejected by Energy Safety on procedural grounds.<sup>6</sup>
- GH-10 (Non-Exempt Expulsion Fuse Removal): The 2025 WMP target for this
  initiative is 1,400. Due to overperformance in previous years, and replacements
  through other programs, the remaining population at the start of 2025 is only 848
  fuses. We will be removing the remaining 848 fuses in 2025 to complete this
  program but will not be able to meet the originally forecasted number of 1,400 as
  the population is no longer that large.

## Implementation of PG&E's Latest Safety Culture Assessment

PG&E's 2023 Safety Culture Assessment (SCA) was issued by Energy Safety on March 22, 2024. The Safety Culture Assessment evaluated the personal and wildfire safety culture at PG&E using a workforce survey, management self-assessments, and interviews. The Safety Culture Assessment provided the following four recommendations for PG&E to act upon:

- 1. PG&E should strengthen its safety communications by improving safety-related communication, addressing worker concerns about the lack of easy access to information on near misses and information on wildfire conditions, and providing leadership listening sessions.
- 2. PG&E should optimize its safety-enabling systems to improve the quality of event investigations and improve the hazard and near-miss reporting process to align expectations on what to report and when to report. PG&E should also continue to take steps to increase workers' psychological safety, building confidence in their speak-up and stop-the-job authority.
- 3. PG&E should continue building on its current worker training plan by:
  - Incorporating new safety-related training modalities. This should include more hands-on training and topics that enable all levels of the organization to develop a more proactive and curious mindset. It should also include assessing participant feedback and using it to make training more effective, relevant, and engaging.
  - Conducting post-training peer learning activities, such as cultivating a mentoring program or encouraging the appointment of a senior team member

<sup>&</sup>lt;sup>5</sup> Energy Safety's Decision on PG&E's 2024 Change Order Request. Available at: <a href="https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs">https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs</a>.

<sup>&</sup>lt;sup>6</sup> PG&E's 2024 Change Order for the 2023-2025 Wildfire Mitigation Plan. Available at: https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56148&shareable=true.

to be a "safety steward". This should include group discussions. PG&E should also cultivate a mentoring program and/or encourage the appointment of a senior team member to be a "safety steward"—someone experienced who can be an effective communicator about responding to real-life situations that involve judgement calls in the field that are not covered by standard policies or procedures.

4. PG&E should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.

On April 5, 2024, PG&E formally notified Energy Safety that it agreed to implement all the findings and recommendations identified in the Safety Culture Assessment.

During Q1 2025, PG&E completed the following actions to advance the implementation of the recommendations from the 2023 Energy Safety Culture Assessment:

#### Pursuant to recommendation #1:

- Improving Safety-Related Communications, actions completed in Q1 include:
  - Daily Safety Messages, the weekly Safety Snapshot and Daily Digest articles continued to focus on enterprise safety and health programs and included psychological safety, driving safety, monthly ergonomic webinars, near hits, and safety recognition. The Daily Safety Messages were sent to all coworkers in the Daily Safety Update email and discussed in each team's Daily Operating Reviews throughout the company. The messaging reinforces the importance of and recognizes coworkers for speaking up for safety and having the confidence to exercise their responsibility to "Stop the Job" when unsafe or potentially unsafe conditions are observed. Additionally, PG&E utilized several communication channels, including videos, as well as in-person and remote discussions with coworkers.
- Ease of access to Near Hit information:
  - The Near-Hit Program shared communications on incident details, including links directing users to where additional information can be found. Other actions included:
    - A week-long Near Hit Program enterprise lockscreen, with an embedded QR code, for coworkers to easily access program information.
    - Near Hits shared by coworkers were regularly communicated on Mondays in the enterprise Daily Safety Update, with applicable resources linked.
    - On-going sharing of functional area Near Hits utilizing Near Hit ReCaps,
       Third Thursday Tool Kits and Regional Safety Director communications.
- Ease of access to wildfire conditions:
  - We utilized the following methods to keep employees notified of wildfire conditions:
    - Daily weather forecast emails were sent by the Meteorology team which included fire potential in our service territory.

- Employees had access to a weather map which provided fire potential index at the circuit level.
- Our Hazard Awareness Warning Center (HAWC) provided real-time situational awareness of events within our service territory.
- Our Livesafe App, which includes geotagging of hazards, alerted coworkers as they traveled throughout the territory.
- PG&E provided all coworkers access to the full version of the Watch Duty app, which allowed them to get notifications when a fire started within their vicinity, to monitor the fire, and be aware of any evacuation orders that may have been issued.
- Provide leadership listening sessions, actions completed in Q1 include:
  - Leaders engaged in several types of listening sessions, including:
    - Leadership Town Halls, which began on March 31 for 2025 and had over 500 attendees, are hosted throughout the year and across the service territory, ensuring insights from various regions are represented. Leadership has 10 additional Town Halls scheduled for 2025. A key topic during the Leadership Town Halls is the PG&E Safety Excellence Management System (PSEMS), which provides insights into how our job roles and daily work align with PSEMS requirements.
    - The executive leadership team hosted calls for all coworkers to attend and ask questions. (e.g., Quarterly Business Update and Operations Business Update)
    - The Operations functional areas held 63 safety-focused events.
    - Held three learning sessions that provided an overview of the Public Safety Standard and the Public Serious Injury and Fatality (SIF) Standard for reporting requirements. A total of 981 coworkers attended these sessions.
    - An Injury Prevention engagement was executed where we reviewed injury trends and provided tips and resources. Topics included human performance tools, functional balance training, safe lifting, pushing and pulling guides, "mechanical aid" use training and line of fire incident prevention. A total of 689 coworkers attended this session.
  - An enterprise Safety Week was held from January 13-17, focusing on leaderfacilitated discussions about fostering a healthy safety culture. Approximately 2,000 leaders participated in the Safety Week leader learning sessions.
  - PG&E leaders continued to be engaged in Go-Sees (planned leadership field visits focused on observing specific types of field work activities), increasing their presence and availability to learn from and support coworkers in problemsolving safety-related risks and concerns.
  - Additionally, PG&E continued to encourage and manage employee concerns and ideas through our Corrective Action Program (CAP). CAP submissions are reviewed daily by senior leadership, and five CAP roadshows and a booth at the New Hire Orientation were hosted to ensure coworkers understand how to use this meaningful speak-up tool.

#### Pursuant to recommendation #2:

- Optimize safety-enabling systems to improve the quality of investigations, actions completed in Q1 include:
  - The execution of causal evaluations for future Serious Injury and Fatality (SIF) Actual incidents was assigned to a specialized team of causal evaluators for the enterprise. SIF Actuals are the most serious and complex safety incidents in the organization. By having a centralized team, including the best causal evaluators, perform these evaluations, we expect we will not only improve the quality and consistency of these investigations, but the process and team will also serve as an ongoing learning opportunity for other causal evaluators in the organization to continue to develop their skills. In Q1, this team completed one Root Cause Evaluation and one Common Cause Evaluation.
  - Causal evaluation refresher training was developed and delivered to 29 Cause Evaluators and 33 Corrective Action Review Board members. This training was developed based on quality and/or awareness opportunities that were observed as part of the organization's ongoing quality review and oversight process. The goal of this training is to reinforce the skills needed to do causal evaluations and increase awareness of the need to continuously improve.
  - The quality of cause evaluations was further improved by streamlining the reporting process. The streamlined reporting process clarifies what is "important information" in a causal evaluation and reinforces the alignment of issue, problem, definition, evidence, analysis and corrective actions. It is anticipated that this will support increased effectiveness and actionability of investigations and corrective actions taken to address process and/or system gaps.
- Improve hazard and near miss reporting process to align expectations on what to report and when to report, actions completed in Q1 include:
  - The Near-Hit Program engaged users with a series of tips and answered who/what/why/when questions to encourage reporting and sharing of Near Hits. These engagements included sharing links that directed users to where they could find additional program and incident information, including the "Submit a Near Hit" option. Additional communications included:
    - Two Near-Hit videos were shared enterprise-wide featuring coworker Near Hits, why the program was important to them, and what actions and improvements were made when their Near Hit was shared.
- Increase worker psychological safety, building confidence in their speak-up and stop-the-job authority, actions completed in Q1 include:
  - Daily safety messages in the Daily Safety Update and articles in the weekly Safety Snapshot were published about the importance of fostering psychological safety. These messages encouraged coworkers to feel that they can speak up, stop the job, and raise safety concerns without fear of judgment or retribution. Functional area Champions actively promoted Diversity, Equity, Inclusion, and Belonging (DEIB) and Employee Resource Group activities for their coworkers, cultivating a psychological safety and speak-up culture.

- Recognizing coworkers who have stopped the job or spoken up when conditions were not safe is another way to reinforce the importance of psychological safety. In Q1, a feature story was published about a recognition submitted via the Enterprise Safety Recognition Program, which awards recognition to coworkers who demonstrate proactive safety behaviors through coworker nominations.
- The first cohort of 14 peer support volunteers were identified, selected, and completed a formalized training course (April 1st) for the new Critical Incident Stress Management (CISM) program that will support our coworkers' psychological safety and well-being in the event of a crisis. Activities in-process include finalizing guidance documents and identifying and securing a clinical support partner in preparation for the planned program launch in Q3 2025.

#### Pursuant to recommendation #3:

- Incorporating new safety-related training modalities, actions completed in Q1 include:
  - PG&E is continuing to expand training modalities and implement new handson training initiatives for employees. Examples of hands-on training initiatives in Q1 are listed below:
    - "Linework Fundamentals" kicked off in March. This two-week hands-on training is a unique offering at PG&E that equips non-traditional electric leaders and field safety specialists with essential skills to understand linework, recognize hazards, and support frontline crews effectively. Two cohorts of students completed the program in Q1, with future trainings scheduled throughout the year.
    - "Maintenance and Construction (M&C) Coordinator" training was assigned to Electric Operations M&C Coordinators in Q1. This instructorled training is being deployed and delivered onsite throughout the PG&E territory by seasoned M&C Coordinators who have completed a formal Train-the-Trainer program. This delivery approach allows participants to receive the training in their work locations with direct access to the tools they use daily, making the training more relevant and hands-on.
    - The training "Substation Switching for Transmission Troubleshooters" was piloted in Q1. This 3-day hands-on training provides transmission troubleshooters with the essential knowledge and skills required for substation switching tasks. The training is conducted at the Evolution Substation, a state-of-the-art substation training site at the Livermore Electric Safety Academy.
  - The summary below includes key training statistics for Q1 2025:
    - 37,043 employees and contractors completed PG&E training
    - 330,624 hours of PG&E training completed
    - 36% was online training (web-based training, virtual learnings, or recorded webcasts) conducted through a work computer or mobile device
    - 63% was hands-on instructor-led training

- Conducting post-training peer learning activities, actions completed in Q1 include:
  - PG&E's Operations Safety Collaboration Center (OSCC) continued the STKY (Stuff That Kills You) Frontline Safety Culture Program which began its pilot in October of 2024 in Gas Operations and Electric System Inspections. In January 2025, a Pilot Effectiveness survey was conducted and following the survey results, the OSCC executive sponsors approved transitioning to internal safety culture mentors. Internal mentors will be hand selected to provide "safety culture mentoring". These mentors will reach beyond Gas Operations and Electric System Inspections to other functional areas that experienced Serious Injury and Fatality events in 2024.
  - Third Thursdays, which are executed monthly, provide opportunities to improve safety culture through intentional and well-planned safety engagements. Third Thursdays continue to be a forum where employees share information regarding incidents and near hits, expand on training, share best practices, and focus on safety. The Third Thursday Toolkits and best practices are continuously adapting and maturing through crossfunctional collaboration, which is promoted through groups such as the OSCC and the Grassroots-Led Safety Council.
  - The Grassroots-Led Safety Council established monthly calls starting in January and a quarterly ad-hoc council meeting limited to grassroots council members only. Key grassroots focus areas included bringing back Family Day across Operations and working to increase on-the-job training for heavy equipment operations. The PG&E-Led Safety Council Executive Meeting occurred on March 24th in Stockton. Topics included Family Day, Snake Awareness, Emergency Response, the "You Got Chocked" Campaign, Journey Management, and Trips Risk Assessment & Map+Standard in support of reducing Serious Injuries and Fatalities and Serious Preventable Motor Vehicle Incidents.
  - The Grassroots-Led Safety Council hosted two Grassroots Coaching and Partnering sessions in San Ramon and Stockton. The sessions focused on frontline safety culture, the energy wheel, and workforce fail safe capacity. Goals of these sessions include enabling the removal of barriers, building relationships, and strengthening partnerships between all PG&E Grassroots members through culture training, interactive scenarios, and building confidence, skills, and expertise. Two additional sessions are planned for 2025.
  - The OSCC worked on developing the scopes and summaries for the three 2025 focus areas, also known as Areas for Improvement (AFI). The three AFIs are Human Performance Tools Pre-Job Safety Briefing, High Energy Gravity Line of Fire, and Organizational Culture and Safety Mindset. The AFIs have leads and co-leads from Gas Operations, Electric Operations and Environmental, Health and Safety. A core team meeting was held on March 25th, where the team reviewed results of three safety questions embedded in the 2024 Joy @ Work survey, discussed the next steps to address the results, and gained leadership alignment across Operations.

- PG&E collects feedback from coworkers about training through multiple channels including post-training surveys, post-pilot feedback, training alignment and apprenticeship committees, and PG&E's Corrective Action Program. The Academy reviews this feedback and makes the appropriate updates to training during the training's regular maintenance cycle or as a part of break-in work as needed. PG&E Academy updated 90 courses in Q1. Additionally, PG&E uses the Kirkpatrick Model to assess training effectiveness, primarily through Level 1 (Student Satisfaction) and Level 2 (Knowledge and Skill Transfer) evaluations. Selected courses also include Level 3 (On-the-Job Application) and Level 4 (Business Impact) evaluations. We use the results of these training effectiveness evaluations to continuously improve training.
- Cultivate a mentoring program, actions completed in Q1 include:
  - PG&E launched a mentoring pilot for field safety specialists intended to improve knowledge and skills. The mentoring program is comprised of 34 modules with the first being Fire Danger Precautions. To complete the Fire Danger Precautions module, field safety specialists are required to review the applicable standard; complete web-based training; have discussions with a mentor where the mentee must explain the Fire Potential Index, Wildfire Mitigation Matrix, and their uses; and additional mitigation measures required for R4 and higher risk ratings. An observation of the mentee performing and documenting a field observation in an area with elevated fire danger is also required before the module is completed.

#### Pursuant to recommendation #4:

- Recognize and take action to mitigate the risk exposure posed by interactions with the public, actions completed in Q1 include:
  - Corporate Security performed field safety training for 400 vegetation management personnel.
  - Corporate security escorted vegetation management field crews to 162 properties with potentially hostile customers and successfully negotiated with property owners leading to no safety incidents while this work was being completed.
  - Workplace Violence incidents continue to decrease in comparison to the same time last year. In Q1 2024, there were 91 workplace violence incidents. In Q1 2025, there have been 64 workplace violence incidents, which is a decrease of 30%.

PG&E remains dedicated to continually improving our safety culture and will continue to provide further information on our progress each quarter.

## Board of Directors' Safety and Nuclear Oversight Committee - Q1 2025 Update

The PG&E Board of Directors' Safety and Nuclear Oversight (SNO) Committee is an important part of our Board-level oversight of safety, enterprise risk, and other matters. A SNO Committee also concurrently exists at the PG&E Corporation Board (collectively referred to as the SNO Committees).

This section describes the oversight activities of the SNO Committees and is organized as follows:

- 1) Safety Topics Covered in SNO Committees' Meetings; and
- 2) Recommendations of the SNO Committees and Management Implementation.

## Safety Topics Covered in SNO Committee Meetings

During the first quarter, the SNO Committees held a meeting on February 19, 2025.

During the February meeting, the SNO Committees received an update on safety, including nuclear safety, safe driving, and safety culture. The Committees also discussed the risk associated with electric distribution underground assets. Lastly, the Committees received an update on battery energy storage system fire safety learnings.

# Recommendations of Boards of Directors' Safety Committee Meetings During Q1 2025

There is an ongoing dialogue between the Chair of the SNO Committees (which includes feedback of the Committees' members) and management, with frequent engagement around the implementation of the workforce safety strategy, safety performance updates, and corrective actions in the normal course of business. In addition, the SNO Committees made the following specific, safety-related recommendations to management during the first quarter of 2025:

- To consider further strengthening the accountability model for drivers that exhibit repeat at-risk behaviors; and
- To determine what can be learned from the Vistra battery storage facility fire and implement lessons learned at PG&E's battery storage facilities.

## <u>Management Implementation of Recommendations Described in Q4 2024 Quarterly</u> Notification

The following summarizes actions that management has taken to implement guidance and direction from the SNO Committees that was described in our Quarterly Notification for the fourth quarter of 2024.

Recommendation # 1: To review policy regarding the accessibility of public to our dams (specifically earthen dams).

## Management's response:

- The security of PG&E's dams is regulated by the Security Branch of FERC's Division of Dam Safety and Inspections. Power Generation worked in concert with our Corporate Security Department (CSD) and the FERC Security branch to perform security and vulnerability assessments of its dams and has identified areas where potential physical security threats exist and is developing and implementing solutions to address them.
- The improvements to dam security include: Deter (signage/visibility), Delay (robust fencing/window protections), Detection and Assessment (intrusion detection systems/cameras with analytics), Deny (access controls/high security locks), and Respond (procedurally having law enforcement respond).
- To date there are approximately 1,600 FERC and CSD recommendations for security improvements which have been prioritized and are planned to be implemented over the next several years with expected completion in 2032.
- The specific security measures employed depend on the characteristics of the specific dam and its surroundings, including the hazard classification of the dam. FERC's Dam Assessment Matrix for Security and Vulnerability Risk (DAMSVR) scoring methodology includes dam composition, so earthen filled dams would have a different score than concrete dams, all else equal. The overall risk is dependent on height, width, location, construction style, and likelihood and potential impacts of a security breech.
- Power Generation employed the use of the Flexible Surveillance Units (FSU) as Interim Risk Reduction Mitigation (IRRM) based on relative risk and timeline to complete the final security improvement projects.
- Power Generation continues to collaborate with CSD, FERC, other dam owners, and industry experts to address the physical security of its dams.

<u>Recommendation # 2</u>: Given downed conductor detection (DCD) technology success, roll out the technology more quickly and share successes with other utilities.

Management's response: Through 2024, PG&E enabled DCD on approximately 1,900 devices protecting approximately 19k HFRA miles across distribution circuits, which last year prevented 55 potential ignitions based on engineering analysis. In 2025, PG&E intends to install an additional 250 devices to expand protection to ~22k HFRA miles and continue to work in conjunction with Beckwith and SEL on industry-leading capability enhancements for DCD.

The PG&E team is collaborating to determine the most appropriate use of company resources on various wildfire mitigation measures to be expanded in 2025. We continue to share our knowledge and performance related to wildfire mitigations by hosting utilities

from across the globe for Go-Sees, presenting at industry conferences and hosting our own Utility Wildfire Mitigation Conference (UWMC) starting in 2024. This year's UWMC is scheduled for May 6-8; the conference will include materials and a presentation on DCD and EPSS.

## Conclusion

Sincerely.

We appreciate the opportunity to provide these updates on our progress implementing our WMP, the latest Safety Culture Assessment, and the SNO Committees' recommendations from the previous quarter. If there are any questions, please feel free to contact Wade Greenacre at wade.greenacre@pge.com.

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Meredith Allen
Vice President, Regulatory Affairs

Appendix 1 - 2025 WMP Initiative Commitments cc: Service Lists I.19-09-016, I.15-08-019, R.21-10-001, and R.18-10-007

**APPENDIX 1: 2025 WMP Initiative Commitments** 

Plan Area	2025 WMP Commitments <sup>7</sup>					
A. Situational Awareness and Forecasting	SA-02 - Line Sensor - Installations	SA-05 - Evaluate FPI and IPW Modeling enhancements	SA-07 - Monitor and evaluate the Cameras AI system's performance	SA-09 - EFD and DFA Reporting		
	SA-10 - Distribution Fault Anticipation (DFA) Installations	SA-11 - Early Fault Detection (EFD) Installations				
B. Grid Design, Operations and Maintenance	AI-01 - Retainment of Inspectors and Internal Workforce Development	AI-02 - Detailed Inspection Transmission – Ground	AI-04 - Detailed Inspection Transmission – Aerial	AI-05 - Detailed Inspection Transmission – Climbing		
	AI-06 - Perform transmission infrared inspections	AI-07 - Detailed Ground Inspections - Distribution	AI-08 - Supplemental Inspections - Substation	AI-09 - Supplemental Inspections - Substation Transmission		
	Al-10 - Supplemental Inspections - Hydroelectric Substations and Powerhouses	AI-11 - Filling Asset Inventory Data Gaps				
	GH-01 - System Hardening - Distribution	GH-02 - Evaluate Covered Conductor Effectiveness	GH-04 - 10K Undergrounding	GH-05 - System Hardening – Transmission		
	GH-06 - System Hardening - Transmission Shunt Splices	GH-10 - Non-Exempt Expulsion Fuse - Removal	GH-11 - System Hardening – Transmission Conductor Segment Replacement			
	GM-01 - Asset Inspections - Quality Assurance	GM-03 – Eliminate HFTD-HFRA Distribution Backlog	GM-06 - EPSS - Down Conductor Detection (DCD)	GM-07 - Updates on EPSS Reliability Study		
	GM-09 - Asset Inspection-Quality Control					

Status color: Blue = "Completed on Time" - pending validation; Green = "On Track" – meets target; Amber = "At Risk" - not on track to meet target but has a catch back plan; Red = "Off Track / Missed" – not meeting target and does not have a catch back plan; Gray = Initiative has not started yet.

Plan Area	2025 WMP Commitments – Continued					
C. Vegetation Management and Inspection	VM-01 - LiDAR Data Collection - Transmission	VM-02 - Pole Clearing Program	VM-03 - Focused Tree Inspection Program	VM-04 - Tree Removal Inventory		
	VM-05 - Defensible Space Inspections - Distribution Substation	VM-06 - Defensible Space Inspections - Transmission Substation	VM-07 - Defensible Space Inspections - Hydroelectric Substations and Powerhouses	•		
	VM-09 - Constraint Resolution Procedural Guideline	VM-13 - Routine Ground - Transmission	VM-14 - Transmission Second Patrol	VM-15 - Integrated Vegetation Management - Transmission		
	VM-16 - Distribution Routine Patrol	VM-17 - Distribution Second Patrol	VM-18 – VM for Operational Mitigations (VMOM)	VM-22 - Vegetation Management – Quality Control		
D. Public Safety Power Shut off	PS-01 - Evaluate enhancements for the PSPS Transmission guidance	PS-02 - Evaluate incorporation of approved IPW enhancements into the PSPS Distribution guidance	PS-06 - Provide batteries to PG&E customers	PS-07 - PSPS Customer Impact Reduction		
	PS-10 - Continue sharing PSPS lessons learned					
E. Emergency Preparedness Plan	EP-01 - Complete PSPS and Wildfire Tabletop and Functional Exercises	EP-02 - Maintain all hazards planning and preparedness program	EP-04 - Expand all hazards planning to include additional threats and scenarios	EP-06 - Review, and revise the CERP and 2 Wildfire Related Annexes on a yearly basis		
F. Community Outreach and Engagement	CO-01 - Community Engagement – Meetings	CO-02 - Community Engagement - Surveys				