

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023
Data Response

PG&E Data Request No.:	CalAdvocates_008-Q002		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_008-Q002		
Request Date:	March 30, 2023	Requester DR No.:	CalAdvocates-PGE-2023WMP-08
Date Sent:	April 5, 2023	Requesting Party:	Public Advocates Office
DRU Index #:		Requester:	Holly Wehrman

SUBJECT: 2023-2025 WMP SUBMISSION

QUESTION 002

Regarding the new “Tree Removal Inventory Program” described in section 8.2.2.2.4 of PG&E’s WMP, PG&E states:

This is a new transitional program for 2023 stemming from the conclusion of the EVM program. This program is intended to work down trees previously identified. PG&E estimates that our EVM inventory included more than 300,000 trees at the end of 2022. Under the Tree Removal Inventory program, we remove or re-inspect trees identified in the EVM program. Based on this on-going re-inspection and evaluation work, we will develop annual risk-ranked work plans and mitigate the highest risk-ranked circuit segments or CPZs first. We plan to address all trees in the inventory in a multi-year program.⁵

- a) Please explain what is meant by the term “transitional” in the first sentence.
- b) Does PG&E intend to identify new trees for the sort of work identified in this inventory?
- c) If the answer to part (b) is yes, please provide PG&E’s methodology and strategy for doing so.
- d) If the answer to part (b) is no, please explain why.
- e) If the answer to part (b) is no, please explain how PG&E intends to achieve comparable risk reduction outcomes to those previously provided by its EVM program.
- f) What is the nature of the abovementioned “on-going re-inspection and evaluation work”?
- g) Please state the frequency of the “on-going reinspection and evaluation work”.
- h) How many years will the abovementioned “multi-year program” last?
- i) After the “multi-year program” ends, will PG&E cease to have a tree inventory?

⁵ PG&E’s WMP, p. 528.

- j) If the answer to part (i) is yes, please explain how PG&E intends to address vegetation in high-risk areas going forward.
- k) If the answer to part (i) is no, please explain how the tree inventory will be maintained and used going forward.
- l) When it is stated that “PG&E estimates that our EVM inventory included more than 300,000 trees at the end of 2022,” please explain why this number is an estimate rather than a precise number.

ANSWER 002

- a) For this program the use of ‘Transitional’ represents the program transition from EVM to our new Tree Inventory Program, which will focus on working down the risk associated with the remaining 385K. These units were identified under EVM guidelines and will be over a period of time based on resolution of constraints or other factors that hindered completion of work.
- b) Yes, but not under the Tree Removal Inventory Program, which is focused on removing risk from previously listed trees with a removal prescription as part of the EVM program. Two new programs, Vegetation for Operational Mitigations (VMOM) and Focus Tree Inspections (FTI) will identify new trees for the sort of work identified in this inventory. Additionally, if any priority trees are discovered while completing the TRI scope of work, they would be listed for work consistent with all other VM programs.
- c) 1) For VMOM, PG&E utilized VM EPSS-enabled outage data, historical VM outage data, and customer outage impact data.
 2) For FTI, Areas of Concern (AOCs) were identified through a cross-functional effort utilizing county-based regional reviews to create polygons which are geographic areas. Initial polygon development utilized WDRMv3 consequence scores, Public Safety Specialist circuit-based evaluations, expertise, 30-year lookback of meteorology data, and analysis, identified PSPS Lookback Polygons, PSPS Vegetation Damage locations, vegetation caused ignition data, and vegetation caused outage data. The process is intended to be performed annually to identify where trends, models, or emerging available data indicated higher likelihood of tree caused damage or outages.
- d) N/A
- e) N/A
- f) The on-going re-inspection and evaluation work will focus on the remaining 209K trees that were identified for removal at the conclusion of EVM that had a TAT result other than ABATE.
- g) The 2023 Tree Inventory Program scope of work is targeting the re-inspection of approximately 28K trees that had a TAT result other than ABATE. Once re-inspected if it is determined that a tree does not need removal the tree will be inspected annually going forward during the Routine Maintenance and Second Patrol inspections.

- h) The program is planned to last 9 years.
- i) No. All of PG&E's various Vegetation Management programs have and will continue to manage inventories of trees, however, the Tree Removal Inventory program is scoped to specifically address trees in the inventory of the discontinued EVM program within 9 years and is currently not planned to continue beyond this time frame.
- j) See answers to b) and c).
- k) The Tree Removal Inventory Program is intended to remove risk from previously identified EVM trees over a period of 9 years and there will be no new EVM trees added to the EVM Tree Removal Inventory.
- l) Due to removal and re-inspection being completed, as well as external factors that can impact our inventory, we are only able to provide an estimated inventory forecast and not a precise number.