

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans**  
**Rulemaking 18-10-007**  
**Data Response**

PG&E Data Request No.:	WSD_011-Q01		
PG&E File Name:	WildfireMitigationPlans_DR_WSD_011-Q01		
Request Date:	March 16, 2021	Requester DR No.:	VM DR for PGE 20210316
Date Sent:	March 23, 2021	Requesting Party:	Wildfire Safety Division
PG&E Witness:		Requester:	Ryan Arba

During the 2020 wildfire season, after wildfires were extinguished, PG&E completed “extensive”<sup>1</sup> vegetation management work that it characterized as “emergency response.”<sup>2</sup> Because this work was characterized as “emergency” work post-fire events, it is the WSD’s expectation that such work would be described in Section 7.3.5.4 “Emergency Response Vegetation Management Due to Red Flag Warning or Other Urgent Conditions” of PG&E’s 2021 WMP Update. Accordingly, the WSD requests the following additional details to evaluate Section 7.3.5.4 of PG&E’s 2021 WMP Update.

**QUESTION 01**

- 1) Provide the methods of notification (e.g., phone calls, emails, door hangers, etc.) and sequences of notification regarding post-fire vegetation work for:
  - a. Customers (i.e., private landowners). Including outreach and notification protocols prior to, during, and post vegetation management. (including but not limited to slash removal, wood (i.e., >4” diameter) management, tree-trimming, and tree removal). How does PG&E ensure communication with and receipt of notifications by customers who have been displaced by the wildfire regarding post-fire emergency VM activities?
  - b. Governments and agencies:
    - i. Local governments (e.g., counties, municipalities, and special districts)
    - ii. State agencies, including but not limited to:
      1. CAL FIRE
      2. CPUC
      3. CDFW
      4. Coastal Commission
      5. State Water Resources Control Board
      6. CA State Parks and Recreation
      7. RWQCB

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<sup>1</sup> County of Santa Cruz Board of Supervisors, December 8, 2020.

<sup>2</sup> PG&E Data Request No.: WSD\_002-Q02, PG&E File Name: Non-CaseDiscovery\_DR\_WSD\_002-Q02, Request Date: December 29, 2020.

- iii. Federal agencies, including but not limited to:
  1. US Fish and Wildlife Service (Department of the Interior)
  2. US Forest Service (Department of Agriculture)
  3. National Park Service (Department of the Interior)
  4. Bureau of Land Management (Department of the Interior)
  5. Department of Reclamation (Department of the Interior)
- 2) Clarify which VM activities PG&E executes during post-fire event emergency work.
- 3) Do the following activities differ from routine work during post-fire situations? If so, explain:
  - a. Slash removal.
  - b. Wood management.
  - c. Tree-trimming.
  - d. Tree-removal.
- 4) Does PG&E's Tree Assessment Tool (TAT) include post-fire specific factors to evaluate "an individual tree's likelihood of failing"? (p. 713) If so, what are those factors? (e.g., crown, bole, and root scorch, char, duff consumption, etc.) If not, why?
- 5) Does PG&E define a set length of time post-fire event during which it considers its VM activities "emergency" work? If so, what is the length of time. If not, define the distinct events that trigger the beginning and end of the post-fire event period during which PG&E considers VM activities to be "emergency" work.

## ANSWER 01

While PG&E generally refers to post-wildfire vegetation management work to remove hazards as an "emergency response," we do not believe this work is applicable to Section 7.3.5.4 "Emergency Response Vegetation Management Due to Red Flag Warning or Other Urgent Conditions" of the 2021 WMP template. The WSD-provided definition for initiative 7.3.5.4 is: "The Plan and execution of VM activities, such as trimming or removal, executed **based upon and in advance of forecast** weather conditions that indicate high fire threat in terms of ignition probability and wildfire consequence." Subject to further guidance from the WSD, PG&E does not believe this post-wildfire vegetation management work is applicable to that section of the WMP template. That detail notwithstanding, PG&E responds to the WSD's questions as follows:

- 1) The sequence of customer and agency notification for post-wildfire vegetation management (VM) work generally follows the following pattern:
  - During an active wildfire, PG&E's Emergency Operations Center (EOC), following Incident Command System (ICS) protocols, is in regular contact with local authorities and other responding agencies at the local, state and/or federal level. Depending on the circumstances of the event, the agencies involved in the ICS response structure generally include CAL FIRE, local first responders / County OES, US Forest

Services, US National Parks, etc. Agencies not involved in the emergency response process may not be proactively notified or engaged regarding PG&E's plans for post-wildfire restoration activities, including the necessary VM work.

- As the fire moves, is contained, or is extinguished, and it becomes safe to work in fire-impacted area, our crews, including the VM team, begin by assessing the conditions in the area. The assessment includes inspecting PG&E's assets and the vegetation around our electrical facilities. Our re-entry into the area to perform these assessments is communicated to partner agencies through the ICS structure and engagement. During this stage of the process, the unified command structure between PG&E and local and/or state emergency response agencies supports coordination, planning, and communication amongst these agencies.
- Post-wildfire VM activities can extend for a longer period (i.e. several to many months) than other emergency response activities. During this extended post-wildfire emergency response phase, the VM team continues to operate in an event response posture until activities are complete or the emergency response for the event is determined to be closed by PG&E or a different authority.
- The customer and/or property owner engagement during the entirety of the emergency response includes:
  - The first phase of post-wildfire VM work is to inspect the fire-impacted area to assess the location and volume of trees that pose a threat to PG&E electrical facilities. During this inspection phase for post-fire VM work, PG&E VM crew members leave flyers or door hangers on homes or at properties where structures have been destroyed.
  - If PG&E VM tree work needs to occur on a property, VM crews will make phone calls where there are active numbers in place, mail letters, and, in some cases, provide contact information through media outlets in seeking to notify property owners about the work to be performed.
  - Most customer inquiries are managed through (800) PGE-5000, but customers can also call the wildfire hotline at (877) 295-4949.
  - VM does not formally track the initial receipt of individual responses from customers for this type of work, but we do have a database to track where property owners have followed up on requests or have refused the work identified.

The volume of post-wildfire VM work has significantly increased in recent years, with 2020 being an unprecedented year for wildfire damaged acres in our service territory. Coordination of post-wildfire VM work is a complex process involving multiple parties with varying needs following an emergency. In light of these facts, PG&E is working on improving our post-wildfire VM communications with agencies. We are eager to incorporate feedback from communities, agencies, and others on how we can best coordinate and execute this unprecedented volume of critical work for the benefit of all our communities.

2) During the post-fire restoration phase, PG&E VM is primarily responsible for providing hazard tree assessment and abatement (trim or remove) in support of equipment repairs and replacement to restore electric service and/or rebuild damaged facilities. This Work typically falls into several primary categories:

- Clearing vegetation for access to work locations
- Clearing vegetation for “Reconductoring”
- Work-site hazard tree mitigation
- Addressing trees damaged by the wildfire that pose a safety risk to electric facilities

3) During post-wildfire emergency response VM work, PG&E follows the same guidelines (CPUC General Order 95, Rule 35, Public Resources Code 4293, Public Utilities Code 8386, and FAC-003-4) and standards (Distribution Routine Patrol Standard and the Transmission Vegetation Management Standard). Immediately after a wildfire, PG&E inspects and removes or trims trees damaged by wildfire that pose a safety risk to electric facilities to facilitate timely and safe restoration of electric service.

- a. Slash removal during emergencies does not differ from Routine VM. During emergencies, brush and debris are treated in accordance with Forest Practice Rules. This is in accordance with PG&E’s Wood Management policy. See the response to 3b below for further details.
- b. Wood Management during emergencies does not differ from Routine VM. PG&E’s Wood Management policy is to chip or lop and scatter woody debris less than 4” in diameter in accordance with forest best management practices. Large diameter wood (4” or greater diameter) is considered property that may have value to the landowner. Large diameter wood is made safe and left on the property.
- c. During post-wildfire response work, PG&E follows the same VM procedures and standards related to trimming that are used during Routine VM activities.
- d. During post-wildfire response work, PG&E follows the same VM procedures and standards related to tree removals that are used during Routine VM activities.

4) The Tree Assessment Tool (TAT) does not include post-fire specific factors such as char, etc. This tool was not developed for, or intended to be used in, post-wildfire response circumstances. When wildfires occur, PG&E performs a hazard tree assessment of the burned area to determine whether trees pose a threat to electric assets and if they should be abated.

5) PG&E’s VM wildfire response team does not define a set length of time after a fire event to delineate “emergency response” or “non-emergency” work. Each emergency event is unique. The conditions that drive the end date for an individual event are based on the emergency itself and the magnitude and details of the impacted area.