

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

PG&E Data Request No.:	CalAdvocates_009-Q008Rev01		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_009-Q008Rev01		
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DRU Index #:		Requester:	Holly Wehrman

Vegetation Management

QUESTION 008REV01

P. 129 of PG&E's WMP states:

When conducting VM activities, PG&E employees and contractors must adhere to PG&E's Best Management Practices (BMP) where practicable. BMPs are considered practicable where physically possible and not conflicting with other regulatory obligations or safety considerations (GO 95 Rule 35 and Public Resources Codes 4292 and 4293) or emergency response situations.

- a) How do VM contractors determine when adherence to BMPs is not "physically possible."
- b) How does PG&E audit or review VM contractors to ensure they are adhering to BMPs where practicable?
- c) What actions does PG&E take if it determines that a VM contractor has not consistently adhered to BMPs where practicable?
- d) Please list all instances in 2022 where PG&E has determined that a VM contractor did not adhere to BMPs where BMPs were practicable, as defined above.
- e) Please list all instances in 2022 in which PG&E took action to reprimand or sanction a VM contractor for failing to adhere to BMPs where practicable.

ANSWER 008REV01 REVISED 01

The BMPs referenced on Page 129 of the WMP in TD-7102P-01-JA01, Best Management Practices (BMPs) are Vegetation Management's (VM) controls to ensure compliance with environmental compliance requirements.

- a) PG&E makes every effort to comply with the BMPs. If the risk of vegetation in relation to our assets and potential non-compliance with GO 95 Rules 18 & 35, PRCs 4292 or 4293, or NERC Standard FAC-003-04 is greater than the potential environmental risk the BMPs are designed to mitigate, then the priority vegetation work takes precedence, consistent with TD-7102P-17, VM Priority Tag Procedure

and TD-7103P-09, Transmission VM Imminent Threat and Hazard Notification Procedure, and referenced in the following Figures provided in the WMP:

- Page 518 – Figure PG&E-8.2.2-1: PG&E’s VM Transmission Inspection Process
- Page 520 – Figure PG&E-8.2.2-2: PG&E’s VM Transmission Second Patrol Process
- Page 522 – Figure PG&E-8.2.2-3: PG&E’s IVM Process
- Page 525 – Figure PG&E-8.2.2-4: PG&E’s VM Distribution Inspection Process,
- Page 527 – Figure PG&E-8.2.2-5: PG&E’s VM Distribution Second Patrol Process
- Page 810 – Figure PG&E-9.2.1-5: Priority 1 and Priority 2 Tree Tags

Examples where PG&E VM contractors might determine that adherence to BMPs is not “physically possible”, and tree work would take precedence include:

- Limited Operating Periods (LOP), either due to weather/saturated soil conditions or potential biological impacts (i.e., nesting bird season) – our work is required year-round in order to comply with regulatory requirements;
- Safety considerations – There may be instances where the only way to safely perform tree mitigation may impact protected environmental resources.

b) PG&E reviews contractor BMP adherence through several methods, including:

- PG&E’s Environmental Management (EM) performs unannounced field audits of projects submitted for environmental review.
- Where there have been noticeable trends for a particular Issue Category of BMP non-conformance, EM will occasionally perform focused field audits.
- PG&E’s vegetation management operations inspectors and program managers perform field observations that may include compliance with applicable laws and regulations, as well as conformance to internal BMPs.

c) Corrective actions associated with non-conformances of BMPs vary depending upon the level of risk of the specific issue.

For BMP non-conformances that are non-compliance of an external regulatory requirement or commitment, the issue is reported in accordance with PG&E’s Compliance Investigations and Self-Reporting Standards¹ as applicable.

Corrective Actions may include any of the following:

- Contractors may be required to take additional training courses to ensure compliance and understanding of when and how to adhere to BMPs;

¹ RISK-4112S, Compliance Investigations Standard; RISK-4112P-02, Notice of Violation and Non-Conformance Procedure; RISK-4104P-03, Shared Services Compliance Incident Identification and Response;

- Contractors and/or internal PG&E personnel may perform site specific remediations as applicable as determined by EM's field reviews;
 - Increased contractor oversight through more frequent field audits by EM, VM Operations, and/or VM Quality;
 - After-the-Fact reporting to any regulator or agency of the activity performed by PG&E on a priority basis that resulted in a regulatory non-compliance event
- d) For the issues that were formally tracked by PG&E EM, please see attachment "*WMP-Discovery2023_DR_CalAdvocates_009-Q008Rev01Atch01.xlsx*." The issues tracked by EM's Issue Management tracking includes 352 issues of concern related to potential BMP or regulatory compliance non-conformances in 2022.

There was a special audit performed in 2021 & 2022 related to BMP 12 (debris disposal near watercourses).

The special audit for BMP 12 conducted of the Enhanced Vegetation Management (EVM) program found that of the more than 400 locations identified by VM Quality Management reviews with "Debris in Waterway," approximately 100 of those issues were associated with confirmed BMP 12 non-conformances and can be found in the "BMP 12 Waterway inspections" tab in the attachment.

- e) PG&E does not centrally exhaustively track all potential instances where PG&E took action to reprimand or sanction a VM contractor for failing to adhere to BMPs where practicable.

However, as PG&E is internally made aware of BMP non-conformances through any of the methods identified in the response (b) above, PG&E tracks these issues and associated corrective actions both informally and formally through any of the following methods, based on the particular issue of concern, the system of record for tracking the issue, and gravity of issue:

- Vendor Scorecards through Contract Management Reviews
- Construction Management Vendor Tracking And monthly vendor meetings
- Environmental Compliance Issue Tracking and regular informal monthly Environmental Compliance Trends meetings between Environmental personnel and Vegetation Management Managers and Directors
- PG&E's Corrective Action Program (CAP)