

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

PG&E Data Request No.:	CalAdvocates_032-Q004		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_032-Q004		
Request Date:	October 31, 2023	Requester DR No.:	CalAdvocates-PGE-2023WMP-32
Date Sent:	November 14, 2023	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

**QUESTION 004**

Describe all vegetation management activities that PG&E typically performs around the following line types. In your responses to parts (b) through (d), please describe if, and in what ways, PG&E's vegetation management activities for that category meaningful differ compared to your response to part (a):

- a) Aboveground distribution mains located in HFTD/HFRA.
- b) Aboveground distribution secondaries located in HFTD/HFRA.
- c) Aboveground distribution services located in HFTD/HFRA.
- d) Right-of-way for underground distribution located in HFTD/HFRA.

**ANSWER 004**

- a) We interpret this question to address Primary Distribution voltages 4kV, 12kV, 17kV and 21kV. The following programs target work on OH facilities:
  - i. Annual Routine Tree Inspection (system-wide all line miles), resulting pruning and tree removals.
    - Pruning to maintain 18 inches of year-round clearance outside HFTD and HFRA
    - Pruning to maintain 4 feet of year-round clearance inside HFTD and HFRA and pruning to maintain 4 feet of clearance inside SRA during declared fire season.
    - Maintenance of Overhang removal in EVM circuit segments completed 2019-2022
    - Mitigation up to complete tree removal for hazardous tree conditions identified during these inspections or brought to PG&E's attention by other inspection programs, customer, or agency notifications.
  - ii. Second Patrol Tree Inspection in HFTD and HFRA, resulting pruning and tree removals.
    - Second inspections approximately 6 months after Annual Routine Inspections to identify emerging hazardous tree conditions.

- Tree Mortality
  - Priority Tree work based on local or tree specific conditions.
  - Address tree response (growth) that annual pruning cannot fully mitigate to maintain compliance with Minimum Distance Requirements
- iii. Vegetation Control (Firebreak maintenance) in SRA/FRA/HFTD and HFRA
- All poles supporting equipment not specifically exempted by 14 CCR 1255
  - Additional inventory in HFTD and HFRA supporting the same equipment requiring firebreaks in SRA and FRA
    - These poles are all inventoried and evaluated for risk.
      - Low risk poles are not maintained unless conditions change to elevated risk.
      - Solid Blade disconnects and split-bolt only locations are not mitigated with firebreak maintenance.
  - Work takes place year-round, and majority of inventory is treated at least 1 time per year.
- b) We interpret this question to address voltages of less than 750 volts on pole-to-pole configurations. The following programs target work on OH facilities:
- i. Annual Routine Tree Inspection (system wide-all line miles), resulting pruning and tree removals.
    - Pruning to mitigate strain or abrasion on the assets.
    - Mitigation up to complete tree removal for hazardous tree conditions identified during these inspections or brought to PG&E's attention by other inspection programs, customer or agency notifications.
- c) We interpret this question to address voltages of less than 750 volts on pole-to-service configurations. The following programs target work on OH facilities:
- i. Mitigation up to complete tree removal for hazardous tree conditions identified during System Inspections (not Vegetation Management program inspections) resulting in EC notifications sent to Vegetation Management for mitigation.
  - ii. Conditions brought to PG&E's attention by other inspection programs, customer, or agency notifications.
  - iii. Vegetation Management program inspections is not focused on these lines however if inspector notice any conditions need work.
- d) PG&E does not currently have a Vegetation Management program with UG ROW maintenance in scope.