

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans Discovery 2023-2025**  
**Data Response**

PG&E Data Request No.:	CalAdvocates_044-Q011		
PG&E File Name:	WMP-Discovery2023-2025_DR_CalAdvocates_044-Q011		
Request Date:	April 15, 2024	Requester DR No.:	CalAdvocates-PGE-2025WMP-08
Date Sent:	April 18, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

**SUBJECT: VEGETATION MANAGEMENT**

**QUESTION 011**

Page 97 of PG&E's 2025 WMP Update states:

The 2023 FTI [focused tree inspection] program explored enhanced inspection practices and evaluated improvements to situational awareness to further inform and guide clearance recommendations. Based on results of the program, PG&E is moving forward with executing 1,500 miles of work in 2024."

- a) Please describe the results of the program on which PG&E is basing the decision to move forward with executing 1,500 miles of work in 2024.
- b) Provide any available reports, analyses, or other documentation of the results of the program.

**ANSWER 011**

- a) The 2023 pilot performed inspections in Areas of Concern (AOC) in Butte, Calaveras, Napa, and El Dorado counties. Inspections utilized Tree Risk Assessment Qualified (TRAQ) arborists exclusively to identify trees to be worked and followed the Distribution Inspection Procedure guidance of Level 1 & Level 2 visual inspections. PG&E also performed 100% Quality Control field review on all miles post-inspection. The pilot yielded 7,170 trees identified for work across approximately 260 miles.

In 2024, the program is being expanded to 1,500 miles; the AOCs represent where our distribution system is most likely to see higher rates of tree failures during wildfire season or winter storms. The objective of the program is to reduce vegetation-caused outages and ignitions from occurring in these areas where there is highest potential for such outages and ignitions. To that end, in 2024, a Level 2 visual assessment will be performed on all strike potential trees within the 1,500 miles. TRAQ arborists will continue to be the only inspectors performing inspections.

PG&E based its decision to move forward with executing 1,500 miles of FTI work based on internal and external factors that supported program development or maturity. The FTI program was initiated in response to RN-22-09 which committed

PG&E to benchmark with other utilities to define best practices and mitigations for hazard tree mitigation, evaluate appropriate inspection intervals and inspection levels. This resulted in PG&E developing its first version of Vegetation Management specific Areas of Concern (AOCs) and a series of commitments to mature the program to more holistic application by 2025.

While PG&E was piloting the Focused Tree Inspection program in 2023, RN-23-07 was issued and assigned “Remedy b” which mandated that PG&E create “a plan to fully implement (beyond the pilot) and mature Focused Tree Inspections during the WMP cycle”. This directive required PG&E to continue forward with FTI in advance of completion of the FTI program pilot. In addition to the two revision notices, the FTI program also created responses to address 2023-2025 WMP Decision ACI(s)<sup>1</sup> as well as, WMP Maturity Survey questions<sup>2</sup>. These responses prompted further advancement of the FTI program while it was still in its initial phases of development.

Initial mileage targets for the FTI program were higher than the 1,500 miles committed in the 2024 WMP targets. Internal target setting decisions were made based on the operational realities resulting from the initial pilot, as well as the increased rigor and expectations to further enhance a program that focused on hazard tree identification, developing more specific guidance on thresholds for Level 2 inspections as well as continue working to bolster Annual and Second patrol Vegetation Management programs in the HFTD for thorough wildfire mitigation of hazard trees.

#### *Footnotes*

*1. ACI references from 2023/2025 WMP Decision: PG&E-23-15. Implementation of Focused Tree Inspections and Addressing the Risk from Hazard Trees. PG&E-23-19. Continued Progression of Vegetation Management Maturity. PG&E-23-21. Identification of High-Risk Species for Focused Tree Inspections*

*2. 04.01.02.Q01 - Does the vegetation database include all vegetation within the right of the way and within strike of the potential assets?*

*04.02.02.Q01- Do the measured parameters and procedures applied during vegetation inspections enable identifying higher risk areas and vegetation?*

*04.02.04.Q04 - Is the relative risk reduction and cost of vegetation inspections considered in strategy development?*

*04.03.02.Q01- Does the electrical corporation proactively trim trees based on predictive modeling results (such as species-specific vegetative growth and limb, trunk, or root failure rates)?*

*07.05.01.Q06 - Does the electrical corporation cooperate or participate in best practice sharing through comparing vegetation inspection, management, treatment procedures, training, and lessons learned with other electrical corporations?*

b) Please see the table below for the results of the 2023 FTI pilot program:

2023 FTI Pilot Results	
<b>Trees Listed for Trim</b>	<b>966</b>
<b>Trees Listed for Removal</b>	<b>5,680</b>
<b>Trees Inspected, No Work Required</b>	<b>524</b>
<b>Trees Identified</b>	<b>7,170</b>