

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Pacific Gas and Electric Company, for authority to decrease its rate and charges for electric and gas service and increase rates and charges for pipeline expansion service-test year 1996 general rate case consolidated with I9502015.

A.94-12-005
(Filed: December 9, 1994)

Commission Order Instituting Investigation into rates, charges, service and practices of PG&E; consolidates with A9412005; authority applies to A9212043 et al.

I.95-02-015
(Filed: February 22, 1995)

Commission Order Instituting Rulemaking, to develop standards for electric system reliability and safety pursuant to D96-09-073. Consolidated with I95-02-015

R.96-11-004
(Filed: November 6, 1996)

PUBLIC VERSION

**PACIFIC GAS AND ELECTRIC COMPANY'S
ANNUAL REPORT ON COMPLIANCE
WITH GENERAL ORDER 166
COMPLIANCE PERIOD: JANUARY 1, 2023 TO DECEMBER 31, 2023**

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Dated: April 30, 2024

Vice President, Emergency Preparedness & Response
PACIFIC GAS AND ELECTRIC COMPANY

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WITH GENERAL ORDER 166
COMPLIANCE PERIOD: JANUARY 1, 2023 TO DECEMBER 31, 2023**

Pursuant to General Order 166, Standard 11, Pacific Gas and Electric Company (PG&E) hereby submits its annual report on compliance with General Order 166 for the period January 1, 2023, through December 31, 2023 (Compliance Period). This report documents PG&E's compliance with each of the fourteen standards of the General Order.

Standard 1. Emergency Response Plan

Standard 1 requires PG&E to prepare an emergency response plan and update the plan annually to incorporate changes in procedures, conditions, law, or Commission policy.

Attached as Exhibit A is the PG&E Company Emergency Response Plan (CERP) in effect during the Compliance Period. PG&E's CERP consists of a base plan and functional and hazard annexes.

The following table summarizes required elements of Standard 1 locations within the PG&E CERP:

**TABLE 1
LOCATION OF REQUIRED ELEMENTS**

Required Element	Section or Subsection
Internal Coordination	2 and subsections, 3 and subsections, 4.1, 4.1, 4.3, 5 and subsections, 6 and subsections, 7 and subsections, 8 and subsections, Appendix C, Appendix D through H
ISO/TO Coordination	2.4.1, 3.5.4.7, 4.4.2, 5.8.2, 7.2.4, 8.2.2, 9.5.9, 9.6.3
Media Coordination	1.1, 1.6, 3.1, 4, 4.1, 4.3, 4.5.1, 4.5.3, 7.1.4, Appendix C, Appendix E.9.3
External and Governmental Coordination	1.1, 4.1, 4.3, 4.4 and subsections, 4.5 and subsections, 4.6, 6.1, 6.2, 6.3, 6.4, 7.1.4, 7.1.5, 7.1.6, 8.1 and subsections, 8.2 and subsections, 9 and subsections, Appendix C, D and E
Wildfire Mitigation Plan	2.8

In accordance with Standard 1, Element D, PG&E maintains contact information for California Governor’s Office of Emergency Services (Cal OES) regional offices and County government emergency management offices, set forth in Exhibit I as CERP EMER-3001M-Att01 and EMER-3001M-Att02, respectively. This contact information is accessible to coworkers responsible for coordinating emergency communications within PG&E’s internal Emergency Management (EMER) Guidance Document Library.

A key element of the CERP is the alignment of PG&E’s functional areas to the frameworks provided by the National Incident Management System (NIMS), California Standardized Emergency Management system (SEMS) and the NIMS/SEMS component Incident Command System (ICS). Adoption of these frameworks aligns PG&E with public partners to execute a coordinated response that supports safe restoration of service and whole community recovery. Specifically, PG&E has adopted the following NIMS, SEMS, and ICS consistent operational components:

1. Formalized SEMS/ICS training and execution of the management by objectives concepts of ICS.
2. Whole community engagement through PG&E’s presence in County Emergency Operations Centers and the State Operations Center, and actions of the Liaison

Officer and team leveraging coordination calls and collaboration of community and customer support.

3. Mutual Assistance agreement memberships at the California, Western Region, and National levels.
4. Use of the same framework as the SEMS Operational Area concept in the context of emergency organizational structure and levels, with emergencies beginning at the local level (Level 1) which is PG&E's base emergency posture.

SEMS/ICS training details can be found in CERP subsection 5.8.1. Whole community engagement is described in CERP section 4, Coordination and Communication. PG&E Liaison Officer actions are described in CERP subsection 7.1.6. Mutual Assistance agreements are outlined in the subsection titled Mutual Assistance and MA Agreements in CERP subsection 10.2. SEMS Operational Area coordination framework details can be found in CERP subsection 9.4, Local Government, Operational Areas, found in Exhibit A.

As required under Standard 1 Element E, a link to PG&E's 2023-2025 Wildfire Mitigation Plan (WMP) (filed with the CPUC on March 27, 2023 and updated on January 8, 2024) is available at [Community Wildfire Safety Program \(pge.com\)](https://www.pge.com/community-wildfire-safety-program).

The 2023-2025 WMP describes in detail how PG&E is actively mitigating wildfire risks, including requirements specified in Standard 1, Element E, and was developed to be consistent with the requirements of the California Public Utilities Code §8386(a). The objective of the 2023-2025 WMP is to reduce the risk and consequences of wildfires associated with utility electrical equipment, and particularly to avoid utility-related catastrophic wildfires across central and northern California.

The CERP addresses Elements A through J of Standard 1. The location of these elements within the CERP are identified in the table above and within Exhibit D. PG&E's CERP Electric Annex is included as Exhibit B to this report. A summary of CERP and CERP Electric Annex updates is set forth below under the heading Standard 11 Annual Report.

Standard 2. Mutual Assistance Agreements

Standard 2 requires PG&E to enter into mutual assistance agreements with other utilities, to the extent such agreements would be practical and improve emergency response. Resources

available to be shared under such agreements are subject to participant party availability in relation to current operational requirements.

For the Compliance Period ending December 31, 2023, PG&E maintained existing agreements with mutual aid associations, including the California Utilities Emergency Association (CUEA), the Western Region Mutual Assistance Agreement (WRMAA), the Edison Electric Institute (EEI), and the American Gas Association (AGA). In addition, PG&E has mutual assistance agreements with individual companies or agencies, including Florida Power and Light Company, Trinity County Public Utilities District (TCPUD), the Western Area Power Administration (WAPA), and the Yolo County Flood Control and Water Conservation District. These agreements provide the terms for requesting and delivering assistance, payment, cost recovery, and legal liability.

Along with mutual aid association and individual company or agency agreements, PG&E is a signatory to a December 8, 2017, multi-party memorandum of understanding for emergency assistance with the Puerto Rico Electric Power Authority (PREPA).

Copies of the agreements and the PREPA memorandum are provided in Exhibit F.

Standard 3. Emergency Training and Exercises

Standard 3 requires the utility to conduct an exercise annually using the procedures set forth in the utility's emergency plan and to evaluate its response to an exercise or incident. From May 8-11, 2023, PG&E Emergency Preparedness and Response (EP&R) hosted the 2023 Public Safety Power Shutoff (PSPS) Functional Exercise. The exercise simulated R5-Plus weather conditions¹ to test PG&E's ability to prepare for, respond to, and recover from a PSPS event in alignment with the CERP, PSPS Annex, and functional area specific plans. Exercise participants and observers included representatives from tribes, state and local government agencies, community-based organizations, and other utilities.

As standard process following all exercises and actual emergency response, PG&E conducts after-action meetings to evaluate and improve emergency plans and protocols. An after-action hotwash was conducted following the conclusion of the Functional Exercise on May 11, 2023.

¹ "R5-Plus" indicates there is an elevated fire potential plus the potential for wind-related outage activity.

PG&E's May 8-11, 2023, Functional Exercise After-Action Report is attached as Exhibit G.

As a guiding training principle, PG&E uses the "Cal OES's SEMS." This is to ensure all agencies (i.e., Cal OES, County Office of Emergency Services (County OES), PG&E and other Investor-Owned Utilities (IOUs)) responding to a potential event are aligned to communicate and respond safely and efficiently.

In February 2020, PG&E, Cal OES, the CPUC, and the other IOUs entered into a multi-phase SEMS training related agreement to help ensure consistent training requirements for all Emergency Operations Center (EOC) staff. For the Compliance Period, PG&E continued to train EOC staff using an ICS Baseline, Expanded, Advanced and Position Specific approach, as follows:

- ICS Baseline: Foundational SEMS and NIMS courses required of all EOC personnel and pre-requisites to any advanced training.
- Expanded: California Specialized Training Institute training request, including:
 - G-191 (EOC/ICS Interface)
 - G-626 (EOC Action Planning)
 - G-775 (EOC Management and Operations)
 - IS-368 (Including People with Disabilities & Others with Access & Functional Needs in Disaster Operations)
 - IS-230 (Fundamentals of Emergency Management)
- Advanced: ICS-300 and ICS-400
- Position Specific: Training focused on EOC specific roles.
 - G-611M (EOC Section Overview, Management)
 - G-611P (EOC Section Overview, Planning)
 - G-611O (EOC Section Overview, Operations)
 - G-611L (EOC Section Overview, Logistics)
 - G-611F (EOC Section Overview, Finance and Administration)

Standard 4. Summary of PG&E’s Communications Strategy

Standard 4 requires PG&E to develop a strategy for informing the public and relevant agencies of a Major Outage or Emergency, as defined by the General Order. PG&E’s strategy for communicating with the media, customers, regulatory agencies, and other governmental organizations is primarily described and annually updated in the Emergency Communications Annex, which is an annex to the CERP.

Attached as Exhibit C, the PG&E CERP Emergency Communications Annex ensures coworkers with emergency communication positions have a thorough understanding of their roles, responsibilities, and processes and that the company speaks with “One Voice” to internal and external audiences. PG&E’s Public Information Officer (PIO) is responsible for establishing and maintaining communications throughout all PG&E levels to support the delivery of regular status updates to internal stakeholders, customers, external agencies, and the media, including the internal and external reporting requirements.

PG&E’s media relations strategy and the channels used before, during, and after emergencies are also presented in the CERP Emergency Communications Annex. For PSPS Events, PG&E used multiple communications channels to notify the public including direct customer notifications, PSPS Address Alerts, the PG&E website, information releases to local media, and Live Agent Call Center Support. For wildfire related notification information, refer to 2023-2024 WMP section 8.4.4.1, Protocols for Emergency Communications, available at the link provided in this report under the heading Standard 1, Emergency Response Plan.

PG&E’s communication strategy incorporates 2022-2023 lessons learned, including after-action review analysis for Capacity Shortage Event actions on August 17, 2022, and August 31, 2022; a Shared PG&E/Southern California Edison PSPS Circuit Event on September 9, 2022; Public Safety Power Shutoff (PSPS) readiness operations targeted for October 6, 2022, and October 22, 2022; November 6, 2022, and December 26, 2022 Winter Storm operations; the December 20, 2022, Ferndale Earthquake; and a December 31, 2022, Atmospheric River Event. During the Compliance Period, PG&E activated its EOC for five weather events and four PSPS events, with two of the PSPS EOC activations resulting in PSPS de-energizations. Post event lessons learned are captured in PG&E’s August 16, 2023, CERP Emergency Communications

Annex update, to include detailed planning, process, and business continuity information and pre-approved message content for coworker use during or after an emergency incident or event.

In local emergencies, PG&E field personnel coordinate their activities with local public safety and other first responders to provide for the safe restoration of service. As incidents expand, internal and external coordination requirements grow, with the Company EOC becoming the single point of coordination for information dissemination when activated, including:

- Damage assessment information, restoration priorities, provision of customer outage information, movement of human resources and equipment, and implementation of mutual assistance.
- Interaction with government agencies, including Cal OES and the Commission, except for operational communications addressed in specific emergency plans and known to EOC personnel.
- Communication with customers and the media.

The Company's community outreach efforts include website communications, media engagement, community events, PSPS and wildfire preparedness regional open houses (webinars), Community Based Organization (CBO) engagement, Medical Baseline (MBL) customer outreach, tribal community engagement, and use of advisory boards. These outreach efforts help customers prepare for the unique impacts of wildfire, de-energization, and natural disaster or emergencies.

PG&E's coordination and communication strategy with state and local governmental agencies is contained in the CERP and the Emergency Communications Annex. PG&E Public Safety Specialists² maintain state and local government contact information in coordination with PG&E's Local Government Affairs department. PG&E teams engage with local agencies throughout the year, with preparation for wildfire and PSPS season being a primary focus.

² Managed by its Wildfire & Emergency Operations, Emergency Field Operations organization, PG&E's Public Safety Specialist (PSS) program is a field-based resource that supports PG&E's response when deployed in support of incident or events. PSS personnel work with local, state, and federal agencies throughout the year to socialize PG&E's emergency response plans and execution goals for fire emergencies.

For wildfire and PSPS activities, PG&E's plan for coordinating communications with state and local government is described in 2023-2025 WMP, section 8.4.3, External Collaboration and Coordination.

For Transmission System issues, PG&E's Grid Control Center (GCC) is the official point of contact with the California Independent System Operator (CAISO). The GCC notifies the CAISO of abnormal system configurations or conditions. PG&E's plan for communicating and coordinating with the CAISO is described in the Electric Annex (Exhibit B) and the Emergency Communications Annex (Exhibit C).

Standard 5. Activation Standard

Standard 5 requires PG&E to coordinate internal activities during a Major Outage in a timely manner. PG&E did not experience a Major Outage, as defined by this General Order, during the Compliance Period.

Standard 6. Initial Notification Standard

PG&E did not experience a Major Outage, as defined by this General Order, during the Compliance Period.

PG&E reports its PSPS customer outage communications in accordance with the detailed reporting procedures set forth in Resolution ESRB-8 and Decision (D.) 19-05-042, issued in Phase 1 of the De-Energization Rulemaking Proceeding (R.18-12-005). This reporting protocol includes as applicable, major outage notifications to the Commission, affected Essential Customers, and the Warning Center at the California Office of Emergency Service.

During the Compliance Period, PG&E notified the Commission of nine (9) EOC activations.

Standard 7. Mutual Assistance Evaluation Standard

Standard 7 requires PG&E to evaluate the need for mutual assistance during a Major Outage. PG&E did not experience a Major Outage, as defined by this General Order, during the Compliance Period.

Standard 8. Major Outage and Restoration Estimate Communication Standard

Standard 8 requires PG&E to inform the public and relevant public safety agencies of the estimated time for restoring power during a Major Outage. PG&E did not experience a Major Outage, as defined by this General Order, during the Compliance Period.

PG&E reports its PSPS customer outage communications in accordance with the detailed reporting procedures set forth in Resolution ESRB-8 and Decision (D.) 19-05-042, issued in Phase 1 of the De-Energization Rulemaking Proceeding (R.18-12-005). This reporting protocol includes as applicable, major outage notifications and restoration estimates sent to Essential Customers, state and local public agencies, and the media.

Standard 9. Personnel Redeployment Planning Standard

Standard 9 requires PG&E to train personnel to assist with emergency activities in preparation for responding to a Major Outage, (i.e., assess damage and perform safety standby). PG&E's personnel redeployment plan in support of safety standby and damage assessment during a Major Outage is set forth in Section 3 of the Electric Annex (Exhibit B). During the Compliance Period, PG&E conducted training sessions for those who may perform safety standby (TECH-0300) in lieu of their normal duties.

As of December 31, 2023, 4,562 non-traditional emergency response employees (such as Meter Readers, Gas Service Representatives, Gas Maintenance and Construction, Gas Transmission and Regulation, Work & Resource Inspectors, Mappers, Estimators, etc.) have completed 911 Standby training (TECH-0300). The training included how to: (1) identify hazards in the electric distribution system, (2) standby hazards safely, and (3) maintain safety for the public and themselves until qualified electric personnel arrive at the scene.

Standard 10. Annual Pre-Event Coordination Standard

PG&E conducts frequent, reoccurring pre-event coordination with public safety partners at the tribal, state, county and city levels throughout PG&E's service area. Key outreach activities include:

- Public Safety Specialist Team Engagements: PG&E’s Public Safety Specialist Team provides personalized engagements (i.e., meetings, calls) specific to external agency emergency preparedness needs and local issues. These engagements encompass a variety of outreach channels, including:
 - First responder workshops
 - Wildfire safety town halls
 - Cal OES Mutual Aid Region Advisory Committee meetings
 - General regional coordinator meetings
 - Professional meetings
 - Trainings, exercises, and drills
 - One-on-one delivery
- Local Government Forums: PG&E offers an annual meeting opportunity to city and county representatives to review emergency plans, highlight programs of interest (such as PSPS), review prior year accomplishments and milestones, receive feedback, and learn of any pertinent city and county work.
- PSPS Regional Working Groups: PG&E organizes and manages quarterly stakeholder working sessions to discuss post wildfire lessons learned, PSPS and wildfire safety work. Working group sessions are designed to discuss lessons learned and build regional collaboration and incorporate learnings into future wildfire safety and PSPS plans.
- Tabletop and Functional Exercises: Drills hosted by PG&E to evaluate its ability to communicate effectively with partners during Wildfire and PSPS outages, gain efficiencies within roles and identify areas of improvement.
- Community Wildfire Safety Program (CWSP) Trainings and Workshops (Ad-hoc): Trainings and workshops for agencies and other public safety partners, (i.e., PSPS Portal trainings, deep dives on wildfire mitigation efforts).

Standard 11. Annual Report

Standard 11 requires PG&E to submit an annual report describing compliance with these standards during the Compliance Period and to identify any modifications to PG&E’s emergency plan. This report covers the Compliance Period January 1, 2023, through December 31, 2023.

The following is a summary of the changes that PG&E made to the emergency plan during the Compliance Period.

Company Emergency Response Plan

PG&E's Exhibit E to this report identifies areas added or updated in CERP versions in effect during the Compliance Period.

Electric Annex

Attached as Exhibit B is the PG&E CERP Electric Annex. This Electric Annex, which was updated on October 5, 2023, provides an outline of PG&E's electric emergency management organizational structure, roles, and responsibilities, and describes the activities undertaken in response to electric emergency outage situations. The Annex is a key element to ensure the company is prepared for emergencies to minimize damage and inconvenience to the public, which may occur because of electric system failures, major outages, and hazards posed by damaged electric facilities.

Emergency Communications Plan

Attached as Exhibit C is the PG&E CERP Emergency Communications Annex. The Emergency Communications Annex, which was updated on August 16, 2023, contains detailed planning, process, and business continuity information and pre-approved content for staff to update as appropriate during or following an emergency or catastrophic event. The plan/annex ensures that all employees with emergency communication positions have a thorough understanding of their roles, responsibilities, and processes that the company is speaking with "One Voice" to internal and external audiences.

To make 2023 PSPS event communications 'smarter', PG&E worked closely with external media outlets, including both paid and earned media, to provide broad awareness to Californians to share tips related to wildfire and PSPS preparedness, socialize available resources, and communicate PSPS event information. PG&E is also focused on enhancing and formalizing coordination with multicultural media organizations for both preparedness outreach and in-event communications. For a description of PG&E media engagement for PSPS events and wildfires, refer to 2023-2025 WMP section 8.4.4.1, Protocols for Emergency

Communications (<https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/pge-wmp-r4-010824.pdf>). For wildfire and PSPS related community outreach, refer to 2023-2025 WMP section 8.5, Community Outreach and Engagement.

Standard 11 also requires that PG&E report on the number of available repair and maintenance (R&M) personnel in each personnel classification and in each county during the Compliance Period. Table 2 identifies the number of PG&E’s R&M employees by county. 3,888 R&M employees were on staff during the Compliance Period. For the personnel or job classification of the employees by county, refer to Exhibit H.

**TABLE 2
R&M EMPLOYEES ON STAFF AS OF DECEMBER 31, 2023**

	Work County Name	Number of Employees
1	Alameda	338
2	Amador	21
3	Butte	181
4	Calaveras	33
5	Contra Costa	305
6	El Dorado	50
7	Fresno	256
8	Glenn	9
9	Humboldt	75
10	Kern	186
11	Kings	30
12	Lake	25
13	Madera	66
14	Marin	51
15	Mariposa	2
16	Mendocino	72
17	Merced	107
18	Monterey	122
19	Napa	33
20	Nevada	38
21	Placer	186
22	Plumas	24
23	Sacramento	112
24	San Benito	12

	Work County Name	Number of Employees
25	San Bernardino	1
26	San Francisco	82
27	San Joaquin	221
28	San Luis Obispo	96
29	San Mateo	191
30	Santa Barbara	25
31	Santa Clara	202
32	Santa Cruz	51
33	Shasta	117
34	Solano	111
35	Sonoma	150
36	Stanislaus	86
37	Sutter	3
38	Tehama	46
39	Tulare	12
40	Tuolumne	20
41	Not assigned	2
42	Yolo	71
43	Yuba	67
	Total	3,888

Standard 12. Restoration Performance Benchmark for a Measured Event

Standard 12 provides that PG&E may be subject to a restoration performance benchmark for Measured Events. PG&E did not experience a Major Outage or Measured Event during the Compliance Period.

Standard 13. Call Center Benchmark for a Measured Event

Standard 13 provides that PG&E may be subject to a call center performance benchmarking for Measured Events. PG&E did not experience a Major Outage or Measured Event during the Compliance Period.

Standard 14. Plan Development Coordination and Public Meeting

In addition to First Responder Workshops, PG&E has invited service area municipalities to provide verbal and written input to its CERP and CERP Electric Annex.

On November 7, 2023, and November 9, 2023, PG&E's Public Safety Specialist (PSS) team hosted local government webinars from 10:00 am to 12:00 noon each day to solicit feedback and consultation on PG&E's CERP and CERP Electric Annex. Exhibit J attached to this report provides a copy of the PG&E meeting presentation shared with online seminar attendees and participants. Exhibit K provides a list of invited representatives, attendees, and participant comments. A total of nine individuals attended the two webinars and three comments were submitted.

Respectfully Submitted,

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