

April 6, 2023

BY ELECTRONIC COMMUNICATION

Electric Safety Policy Division
Office of Energy Infrastructure Safety (Energy Safety)
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: **Submission of PG&E's 2023-2025 Wildfire Mitigation Plan Substantive Errata**

To Electric Safety Policy Division:

Pursuant to Section 4.3 of the 2023-2025 Wildfire Mitigation Plan (WMP) Process and Evaluation Guidelines (the Process Guidelines), Pacific Gas and Electric Company (PG&E) hereby submits our substantive errata for our 2023-2025 WMP. We have also included some non-substantive errata that has been identified to date, in an effort to expedite the correction process.¹

The substantive errata in this submission include the following categories of items:

- Narrative updates/corrections;
- Figure and Table updates/corrections; and
- Target updates/corrections.

The non-substantive errata in this submission include the following categories of items:

- Narrative updates/corrections; and
- PDF corruption adjustments (outlined below).

PG&E discovered this week that a glitch with Adobe Acrobat caused an isolated issue where random characters/letters were missing from various locations throughout the March 27th submittal of our Public and Confidential WMPs.

¹ We will also likely submit additional non-substantive errata prior to the April 26, 2023 deadline, as outlined in the 2023 WMP Schedule.

To ease readability, we are submitting a new copy of PG&E's 2023-2025 WMP (version R1) with this errata submittal that corrects the prior Acrobat issues. We have also included in this version, all substantive and non-substantive errata that is outlined in Attachment 1.

In addition, the public version of the 2023-2025 WMP R1, with its supporting documentation, is being uploaded today to our website, located at <https://www.pge.com/wildfiremitigationplan>.

We appreciate Energy Safety's review of our errata for the 2023-2025 WMP. Please let us know if you need any additional materials or clarifications.

Sincerely

_____/S/____

Jay Leyno

Director, Community Wildfire Safety Program

Attachments: 1

Attachment 1

**Errata to Pacific Gas and Electric Company's 2023 Wildfire
Mitigation Plan**

Substantive Errata (22)

	Issue	Location of issue	Adjustment made
1	VM-01 Target Name and % Risk Impact changed	Table 7-3-2 (pg. 299), Table 8-14 (pg. 507), Table 8-15 (pg. 512)	Change Target name to "LiDAR Data Collection - Transmission"
2	VM-01 Target – Clarify Unit Completion Definition by inputting Footnote	Table 7-3-2 (pg. 299) Table 8-14 (pg. 507) Table 8-15 (pg. 512)	Added footnote: "LiDAR is flown in late summer and early fall in the prior year to enable ground inspection's next cycle to begin in November that then allows tree work to commence on January 1 of the following year." Determine if change should impact Target Description."
3	Revise narrative – remove IVM language	Section 8.2.3.7, pg. 549 & 550	Striking the IVM reference in that sentence and changing to the following: In 2023, PG&E will pilot other new initiatives. For example, we are purchasing... Change the regulations section to the following: PG&E Operational Procedures • PG&E Operational Standard: Transmission Right-of-Way (ROW) Maintenance and ROW Expansion Programs Standard (TD-7111S). • PG&E Operational Procedure:

	Issue	Location of issue	Adjustment made
			Transmission Integrated Vegetation Management Procedure (TIVM) Procedure (TD-7103P-04).
4	Changes to workflow for VM Routine Transmission	Figure PG&E-8.2.2-4 (pg. 531) Figure PG&E-8.2.2-5 (pg. 533)	1) "Prescribe work (Create work order)" changed to "Prescribed work" 2) "Follow Vegetation Management Hazard Notification Procedure (TD-7102P-17)" change to "Follow Vegetation Management Hazard Notification Procedure (TD-7103P-09)"
5	Missing "infrared" from narrative sentence	Section 8.1.3.3.1 (pg. 418)	"Supplemental substation inspections are performed in addition to the routine inspections (GO 174) that are part of the maintenance practices described in PG&E's Substation Equipment Maintenance Requirements Standard (TD-3322S). The supplemental inspection program includes three methods of inspection: drone-based aerial inspection; ground-based visual inspection; and <u>infrared</u> inspection."

	Issue	Location of issue	Adjustment made
6	VM-05 and VM-06 refined Unit Completion Definition	Table 7-3-2 (pg. 300) Table 8-14 (pg. 508-509) Table 8-15 (pg. 512)	"Draft Footnote: ""Defensible Space inspections begin in late November to enable work mitigation to be completed before fire season begins in the following year."
7	Remove repetitive reference	Figure PG&E-8.2.2-2 (pg. 526)	Remove the words “, and IVM”
8	Updates / recalculation of financials for Table 11 of the QDR; affected the executive financials in Section 4.3, Table 4-1	Table 11 QDR	<i>This data will be submitted in the Q1 QDR on May 1, 2023.</i>
9	Updates / recalculation of financials for Table 11 of the QDR; affected the executive financials in Section 4.3, Table 4-1	Section 4.3, Table 4-1	Recalculation of financials
10	Work Order Graph data (Tags) does not match with the QDR	Section 8.1.7.1, Figure PG&E-8.1.7-1 (pg. 454-455)	1) Match graph to QDR data 2) Updated in section 8.1.7.1; removed graphic from 8.1.7.2 and 8.1.7.3
11	Update narrative and map due to updated Cal Fire data	Section 5.4.3.3 Sub-Divisions With Limited Egress or No Secondary Egress pg. 129-130	Updated narrative and map
12	Rewording	Appendix D: ACI PG&E-22-20 – Asset Inspection Drone Program Pilot	Consolidated language for IQA activities.
13	VM-02 Target value	Table 7-3-2 (pg. 299) Table 8-14 (pg. 507) Table 8-15 (pg. 512)	Change 2023 Target value from from "77,000" to "77,503"
14	Yearly Target Pass Rate for 2023-2025	Section 8.2.5.2, Table 8-18-3 (pg. 561)	Input 88% (pass rate) for each of the four programs listed.

	Issue	Location of issue	Adjustment made
15	Updated Table 8-8-1. Open work orders Transmission	Section 8.1.7.1, pg. 454	Updated numbers in table
16	Remove Table 8.1.7-3. Open work orders Distribution	Section 8.1.7.2	Added explanation of table removal. Removed due to inability to provide requested data.
17	To consolidate and align with the QDR, we removed the following Figures due to incorrect data, and consolidated the correct data into a single Figure (to align with the QDR). The Figures which were removed included: 1) 8.1.7-1 (transmission asset work orders) 2) 8.1.7-4 (distribution asset work orders)	Section 8.1.7.1, pg. 464	Consolidated three separate visuals into one; Figure now includes Transmission, Distribution, and Substation asset work orders (new Figure 8.1.7-1)
18	Updated narrative in open work orders sections to reference new graphic (Distribution and Substation)	Section 8.1.7.2, pg. 463 Section 8.1.7.3, pg. 467	n/a
19	Updated language regarding stress index model.	Section 4.4, Pg. 78	n/a
20	Incorrect data	Section 5.3.2, Table 5-4	Data correction to align with CALFIRE data
21	Updated attachment in entirety; incorrect data was used in first submission.	2023-03-27_PGE_2023_WMP_R0_Section 6.4.2_Atch01 <i>Update becomes</i> 2023-03-27_PGE_2023_WMP_R1_Section 6.4.2_Atch01	Replaced attachment data in entirety. Updated all references of attachment name from 'R0' to R1' for this attachment.

	Issue	Location of issue	Adjustment made
22	Updates to map layers to reflect new CALFIRE information	2023-03-27_PGE_2023_WMP_R0_Appendix C _Atch01 <i>Update becomes</i> 2023-03-27_PGE_2023_WMP_R1_Appendix C _Atch01	Updates to map layers to reflect new CALFIRE information. Updated all references of attachment name from 'R0' to R1' for this attachment
23	Data update and naming convention of attachment update due to data error.	2023-03-27_PGE_2023_WMP_R0_Appendix D ACI PG&E-22-16_Atch01_CONF <i>Update becomes</i> 2023-03-27_PGE_2023_WMP_R1_Appendix D ACI PG&E-22-16_Atch01_CONF	Data updated on column U Feasibility Score by CPZ to High Fire Feasibility Score by CPZ. This had no impact to the project selection process.

Non-Substantive Errata (5)

	Issue	Location of issue	Adjustment made
1	Incorrect # of our partnerships with CBOs	Section 8.5.2, pg. 739	Correct # of partnerships from 678 to 67.
2	Language/terminology correction	Section 9.1.3, Table 9-4, pg. 765	Updated name and acronym to be consistent with the rest of the WMP, Wildfire Risk Governance Steering Committee (WRGSC)
3	Incorrect Acronym reference	Numerous locations throughout the WMP	Corrected "WGRSC" to "WRGSC". Removed "WGRSC" from acronym list (Appendix H).
4	Language/terminology correction	Appendix D- ACI 22-05, pg. 869	Remove the word "for".
5	Decision reference D.16-01-008 was substituted with a more applicable decision reference (D. 19-05-042 and OIR 18-12-005	Section 9.1.3, Table 9-3 and 9-4	N/A
6	WMP Resubmission to resolve text illegibility stemming from Adobe Acrobat conversion issues in numerous locations (i.e., random characters missing in words)	Numerous locations throughout the WMP PDF.	N/A