

November 3, 2025

OFFICE OF ENERGY INFRASTRUCTURE SAFETY OF THE CALIFORNIA NATURAL RESOURCES AGENCY

**Subject: Pacific Gas and Electric Company's Quarterly Notification Regarding the Implementation of Its Wildfire Mitigation Plan and Its Safety Recommendations; Submitted Pursuant to Public Utilities Code Section 8389(e)(7), the Office of Energy Infrastructure Safety's Compliance Operational Protocols, and Assembly Bill 1054**

Pacific Gas and Electric Company (PG&E) respectfully submits this Quarterly Notification detailing: (1) the status of our current Wildfire Mitigation Plan (WMP); (2) recommendations of the most recent safety culture assessment; (3) recommendations of the Board of Directors' safety committee meetings that occurred during the quarter; and (4) a summary of the implementation of any safety committee recommendations from the previous quarterly submittal. This Quarterly Notification is provided pursuant to California Public Utilities Code (PUC) Section 8389(e)(7), the Office of Energy Infrastructure Safety's (Energy Safety) Compliance Operational Protocols, issued on February 16, 2021 (Compliance Operational Protocols) and subsequently clarified on September 8, 2021, by Energy Safety, and the 2024 Safety Certification Guidelines issued on June 19, 2024.<sup>1</sup>

**Background**

On July 12, 2019, Governor Gavin Newsom signed Assembly Bill (AB) 1054 into law, adding Section 8389(e)(7) to the PUC. As one of the conditions for the issuance of a safety certification, Section 8389(e)(7) — as amended by AB 148 — requires documentation of the following:

The electrical corporation is implementing its approved wildfire mitigation plan. The electrical corporation shall file a notification of implementation of its wildfire mitigation plan with the office and an information-only submittal with the commission on a quarterly basis that details the implementation of both its approved wildfire mitigation plan and recommendations of the most recent safety culture assessments by the commission and office, and a statement of the recommendations of the board of directors safety committee meetings that occurred during the quarter. The notification and information-only submittal shall also summarize the implementation of the safety committee recommendations from the electrical corporation's previous notification and submission. If the office has reason to doubt the

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<sup>1</sup> Energy Safety issued "Submission of Safety Certification Request and Supporting Documents" on September 8, 2021, which, among other items, clarified Assembly Bill 148, effective as of July 22, 2021, updated PUC Section 8389(e)(7) to reporting requirements, notably that the Quarterly Advice Letter (QAL) would change in format, but not content, to the Quarterly Notification.

veracity of the statements contained in the notification or information-only submittal, it shall perform an audit of the issue of concern. The electrical corporation shall provide a copy of the information-only submittal to the office.

On February 16, 2021, Energy Safety issued Compliance Operational Protocols which, in addition to the existing requirements established by Section 8389(e)(7), provide further guidance and requirements for electrical corporations' quarterly submissions. Specifically, the Compliance Operational Protocols standardize the quarterly submission dates across electrical corporations and describe the information and materials to be included in the Quarterly Notifications.

Additionally, and pursuant to the current Safety Certification guidelines, PG&E is simultaneously submitting this quarterly notification to the California Public Utilities Commission as an information-only submittal to the following email address: [safetypolicycentralfiles@cpuc.ca.gov](mailto:safetypolicycentralfiles@cpuc.ca.gov).

This Quarterly Notification submission provides the requested information for the third quarter (Q3) of 2025, pursuant to the guidelines from Energy Safety and the statutory requirements.

### **Q3 2025 Update**

### **WMP Regulatory Background and Scope of Quarterly Notification**

We submitted the initial version of our Base 2023-2025 WMP on March 27, 2023, and a corrected version on April 6, 2023.<sup>2</sup> A Revision Notice was issued by Energy Safety on June 22, 2023, and we submitted a revised WMP on August 7, 2023. On September 11, 2023, we submitted a request to Energy Safety to supplement our Revision Notice Response, which was granted on September 12, 2023. We submitted our Supplemental Revision Notice Response on September 27, 2023. We received final approval of our WMP on December 29, 2023, and submitted a revised 2023-2025 Base WMP on January 8, 2024.

We submitted our 2025 WMP Update on April 2, 2024. Energy Safety issued a decision on November 19, 2024, approving our 2025 WMP Update. The most recent version of our Base WMP (R8) was submitted on February 13, 2025, at the direction of Energy Safety.

Table 1 of our Q3 2025 Quarterly Template Workbook, which is being submitted concurrently with this Quarterly Notification, provides progress updates for our 55 initiative commitments, which include both targets and objectives.<sup>3</sup> This Quarterly Notification provides additional details associated with these initiative commitments.

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<sup>2</sup> PG&E's 2023-2025 WMP is available at: [www.pge.com/wildfiremitigationplan](http://www.pge.com/wildfiremitigationplan).

<sup>3</sup> This total does not include five three-year objectives completed in 2023, four three-year objectives completed in 2024, and our fifteen ten-year objectives. Additionally, the total does not include four targets which were closed in 2023 or 2024.

## **2025 WMP Initiative Commitment Summary**

A table with all 55 initiative commitments, including the status of each, is provided in Appendix 1. A summary of the status of these initiative commitments, broken down by WMP category, is provided in Table 1 below. The Energy Safety guidelines indicate that five pre-designated status categories should be used for each initiative commitment.<sup>4</sup>

**Table 1: Summary of 2025 WMP Initiative Commitments**

<b>2023 WMP Category</b>	<b>Completed</b>	<b>In Progress</b>	<b>Total</b>
A. Situational Awareness and Forecasting	1	5	<b>6</b>
B. Grid Design, Operations and Maintenance	13	9	<b>22</b>
C. Vegetation Management and Inspections	11	5	<b>16</b>
D. Public Safety Power Shut Off	3	2	<b>5</b>
E. Emergency Preparedness Plan	1	3	<b>4</b>
F. Community Outreach and Engagement	1	1	<b>2</b>
<b>Total</b>	<b>30</b>	<b>25</b>	<b>55</b>

**In addition, we note the following on five of our initiatives that have been shared with Energy Safety during the monthly WMP Commitment Update meeting:**

- **GM-03 (Eliminate HFTD-HFRA Distribution Backlog):** The backlog volume for this work is slightly delayed with 47,457 distribution backlog ignition risk units closed. This is short of our internal forecast for this work, of 48,546 distribution backlog ignition risk units, leaving a gap of 1,089 units. This gap is due to a delay in getting ready jobs scheduled and Mega Bundle contracting delays. However, we have implemented a corrective action plan, and this commitment is still on track to be completed by end of year. Given that this is an annual target, with no quarterly targets, and that we anticipate that it will be completed by the end of the year, we have not marked this initiative as delayed.
- **PS-06 (Provide Portable Batteries to PG&E Customers):** Our 2025 target for PS-06 is to provide 3,300 new or replacement portable batteries to PG&E customers. As of Q3, we have provided 2,025 portable batteries and 1,444 permanent batteries, giving us a total of 3,469 batteries. We are marking this commitment as 'Complete'. Although our 2024 change order request to include permanent

<sup>4</sup> See Energy Safety's Data Guidelines v4, page 153 (indicating status should be: completed, in progress, planned, delayed, or canceled). Please note that there are no canceled, delayed, or planned initiatives, so we have not included a column for those statuses in this update.

batteries was denied by Energy Safety on procedural grounds, we continued with this effort to provide both permanent and portable batteries as part of this initiative because we believe it best meets the needs of our customers.<sup>5</sup>

- VM-05 (Defensible Space Inspections - Distribution Substation): We completed inspections at 130 substations compared to the WMP target of 131. The gap to target of one unit is due to the decommissioning of the North Branch substation. 100% of the scope for this commitment has been achieved and, thus, we are marking this initiative as complete. We will provide the decommissioning documentation during the compliance process.
- VM-07 (Defensible Space Inspections - Hydroelectric Substations and Powerhouses): We completed inspections at 58 substations compared to the WMP target of 61. The gap to target three units is the result of the transfer in ownership of two substations and one physically disconnected from the grid. 100% of the scope for this commitment has been achieved and, thus, we are marking this initiative as complete. We will provide the transfer documentation during the compliance process.
- AI-07 (Detailed Ground Inspections – Distribution): For this commitment, we are projecting to achieve 34% Eyes on Risk (EOR) in 2025 versus the annual WMP projected target of 45%. This is because the work plan for the three-year WMP was front loaded with higher risk assets in 2023 and 2024. However, we are on track to deliver the projected EOR for this target because we will average 48% eyes on risk across the three-year 2023-2025 period, which is higher than the 44% average eyes on risk set out in the 2023-2025 WMP. In addition, as discussed with Energy Safety, we are now including Comprehensive Pole Inspections (CPI) as part of the unit count.

### **Implementation of PG&E's Latest Safety Culture Assessment**

PG&E's 2023 Safety Culture Assessment (SCA) was issued by Energy Safety on March 22, 2024. In the first quarter of 2025 PG&E completed the 2024 Safety Culture Assessment, but as of the date of this filing we do not have the results. PG&E is continuing to act and report out on the recommendations from the 2023 Safety Culture Assessment. The Safety Culture Assessment evaluated the personal and wildfire safety culture at PG&E using a workforce survey, management self-assessments, and interviews. The Safety Culture Assessment provided the following four recommendations for PG&E to act upon:

1. PG&E should strengthen its safety communications by improving safety-related communication, addressing worker concerns about the lack of easy access to

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<sup>5</sup> Energy Safety's Decision on PG&E's 2024 Change Order Request. Available at: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>.

<sup>6</sup> PG&E's 2024 Change Order for the 2023-2025 Wildfire Mitigation Plan. Available at: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56148&shareable=true>.

information on near misses and information on wildfire conditions, and providing leadership listening sessions.

2. PG&E should optimize its safety-enabling systems to improve the quality of event investigations and improve the hazard and near-miss reporting process to align expectations on what to report and when to report. PG&E should also continue to take steps to increase workers' psychological safety, building confidence in their speak-up and stop-the-job authority.

3. PG&E should continue building on its current worker training plan by:

- Incorporating new safety-related training modalities. This should include more hands-on training and topics that enable all levels of the organization to develop a more proactive and curious mindset. It should also include assessing participant feedback and using it to make training more effective, relevant, and engaging.
- Conducting post-training peer learning activities, such as cultivating a mentoring program or encouraging the appointment of a senior team member to be a "safety steward". This should include group discussions. PG&E should also cultivate a mentoring program and/or encourage the appointment of a senior team member to be a "safety steward"—someone experienced who can be an effective communicator about responding to real-life situations that involve judgement calls in the field that are not covered by standard policies or procedures.

4. PG&E should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.

On April 5, 2024, PG&E formally notified Energy Safety that it agreed to implement all the findings and recommendations identified in the Safety Culture Assessment.

During Q3 2025, PG&E completed the following actions to advance the implementation of the recommendations from the 2023 Energy Safety Culture Assessment:

**Pursuant to recommendation #1:**

- Improving Safety-Related Communications, actions completed in Q3 include:
  - Daily safety messages were published in the Daily Safety Update focused on several key themes: wildfire safety and emergency preparedness, National 811 Day and incident-specific reminders; Serious Injury and Fatality (SIF) prevention, with emphasis on essential controls and honoring fallen coworkers; motor vehicle safety, highlighting performance against Serious Preventable Motor Vehicle Incident (SPMVI) targets and high-energy driving hazards; and safety culture, encouraging speak-up behavior, stopping the job responsibility and personal accountability. Real-life examples, such as a fire alarm response and safe parking practices, were used to illustrate how individual actions reflect broader safety values. Safety Week in July promoted practices such as pre-job safety briefings and adherence to procedures, while data-driven insights

- addressed AED compliance, traffic control and slope safety standards. Seasonal tips on hydration, sun exposure, and bug safety rounded out the messaging.
- Daily Digest articles recognized coworkers for speaking up for safety and having the confidence to exercise their responsibility to stop the job when unsafe. The Daily Digest also shared Safety Awareness and Safety Advisory communications along with Initial Incident Reports to provide timely updates, safety reminders and lessons learned to help prevent SIFs.
  - The 2025 PG&E Champion Awards ceremony honored 62 coworkers across seven award categories celebrating them for going above and beyond in areas such as safety, innovation, customer service, inclusion and belonging, community service, environmental leadership, and acts of bravery. Each award highlighted inspiring stories of individuals and teams who exemplified PG&E's values and made significant contributions to the company and community.
  - The second enterprise Safety Week of the year, focused on pre-job safety briefings and practicing human performance tools. Leader toolkits contained thought-provoking questions and videos that enabled robust discussion about near hits, SIFs, and preventative measures to fail safely when incidents occur.
  - In addition to written communications, PG&E utilized several communication channels, including videos, in-person and remote engagements.
- Ease of access to near hit information:
    - The Near Hit program shared near hit communications through the new weekly Safety Spotlight, which provided incident details, key takeaways, and safety reminders. It also included a link for coworkers to contact the Safety and Health team for more information.
    - Outreach activities such as CAP Roadshows, Safety Summits, and Safety Fairs continued to be used to educate and engage coworkers on the near hit reporting process.
    - GrassrootsTV continued expanding its reach into Operations frontline teams, focused on sharing timely and impactful videos of near hits and safety learnings with our frontline teams. Grassroots newsletters are one of the vehicles for sharing the videos, reinforcing adherence to safety procedures, and recognizing coworkers for demonstrating their stop-the-job responsibility and other positive safety behaviors
  - Creating ease of access to information on wildfire conditions:
    - We continued to utilize the following methods to drive employee notification and awareness of wildfire conditions as a year-round prevention strategy:
      - Daily weather forecast emails were sent by the Meteorology team which included fire potential index across our service territory. Employees have access to a weather map which provided fire potential index at the circuit level.
    - Our Hazard Awareness Warning Center (HAWC) provides real-time situational awareness of events within our service territory.

- Our LiveSafe app, which includes geotagging of hazards, alerted coworkers to potential hazards as they traveled throughout the territory.
- PG&E provided all coworkers with access to the full version of the Watch Duty app, which allowed them to get notifications when a fire starts within their vicinity, to monitor the fire, and be aware of any evacuation orders that may have been issued.
- Provide leadership listening sessions, actions completed in Q3 include:
  - Quarterly injury prevention sessions to review Q3 injury trends and provided insights and available resources. The sessions were attended by 335 coworkers on the topics of the energy wheel and the importance of having essential controls in place to prevent line-of-fire incidents. Additionally, increased awareness was provided regarding insect bites along with reducing ergonomic risks for strains related to lifting/lowering and pulling/pushing activities.
  - Learning sessions were attended by 51 pilot participants who have in-cab camera technology installed in their company vehicles to coach them on safe driving behaviors that reduce distracted and fatigued driving.
  - A total of 1,322 Field Safety Specialists and leaders participated in targeted learning sessions, leveraging a newly implemented tool to conduct onsite safety engagements. These interactions focused on ensuring frontline crews consistently apply Essential Controls while performing their tasks, reinforcing a culture of safety and operational excellence.
  - Nearly 1,000 leaders from across the service territory participated in Leadership Town Halls, ensuring regional perspectives were well represented. A central focus of these sessions was the PG&E Safety Excellence Management System (PSEMS), which provided valuable insights into how individual roles and daily operations align with PSEMS principles and requirements.
  - Grow Learning Series designed to build and strengthen our coworkers' business understanding, support career development, and foster our virtue of curiosity were held on the topics of powering safety through financial stewardship and the Power of We: Belonging, reinforcing the connection between operational excellence, fiscal responsibility, and inclusive workplace practices.
  - Operations all-coworker meetings and calls were held both in-person at service centers and yards, and virtually in July and September, providing timely business updates and creating opportunities for employee questions and feedback. The July session engaged 3,175 participants, while the September session saw increased attendance with 3,587 participants. A key highlight of these meetings was coworker recognition, celebrating individuals and teams for their contributions to safety, progress makers and service anniversaries.
  - Monthly Curious Minds Forum listening sessions, focused on the PG&E Safety Excellence Management System (PSEMS), engaged over 250 coworkers in discussions around leadership commitment, change management, and operational controls. These sessions supported ongoing alignment with PSEMS strategy and requirements.

- In addition, the executive leadership team hosted open-access calls such as the Quarterly All-Coworker Business Update, providing opportunities for employees to ask questions and receive transparent business updates.
- PG&E leaders also continued their active participation in Go-Sees—planned field visits designed to observe specific work activities. These visits increased leadership visibility and fostered direct engagement with frontline teams, enabling collaborative problem-solving around safety-related risks and concerns.

**Pursuant to recommendation #2:**

- Optimize safety-enabling systems to improve the quality of investigations, actions completed in Q3 include:
  - The Causal Evaluation training program was significantly enhanced by aligning existing web-based modules with updated processes and integrating new, consolidated content. The improvements also included foundational cause evaluation principles tailored specifically for contractor safety partners, ensuring they are equipped to support contractors and effectively address questions related to SIF incidents and their evaluations.
  - To promote continuous learning and strengthen organizational awareness, a weekly report summarizing key lessons from completed SIF incident evaluations was developed and distributed to all employees. This initiative has helped deepen understanding of causal factors and improve safety practices across the company.
  - The most critical SIF incidents were assigned to a dedicated team of highly skilled and experienced investigators. These professionals consistently showed exemplary evaluation practices, set a benchmark that elevated the capabilities of other evaluators, and ensured that high-severity incidents received the attention and ability they called for.
- Improve hazard and near hit reporting process to align expectations on what to report and when to report, actions completed in Q3 include:
  - The Near Hit program partnered with the Gas and Electric near hit teams, establishing monthly meetings to align communication expectations and identify opportunities for improvement.
  - Outreach activities (CAP Roadshows, Safety Summits, and Safety Fairs) were again utilized to educate and engage coworkers on the near hit reporting process.
  - Additionally, the near hit process came under new management. The new management team performed the following:
    - Assessed the previous process, identified inefficiencies and streamlined documentation.
    - Identified the need to validate the accuracy of near hit data and initiated a clean-up activity to correct previously unreviewed data.
    - Assigned a gatekeeper to review, validate, and correct new near hit submissions on a weekly basis.



- Increase worker psychological safety, building confidence in their speak-up and stop-the-job authority, actions completed in Q3 include:
  - Daily safety messages in the Daily Safety Update and articles in the weekly Safety Snapshot and Daily Digest were published about the importance of fostering psychological safety. These messages encouraged coworkers to feel that they can speak up, stop the job, and raise safety concerns without fear of judgment or retribution. Functional area champions actively promoted Inclusion and Belonging (IB) and Employee Resource Group (ERG) activities for their coworkers, cultivating a culture of psychological safety where speak-up and stop-the-job responsibilities are encouraged and recognized.
  - Recognizing coworkers who stopped the job and/or spoke up when conditions were not safe is another way we have reinforced the importance of psychological safety. A coworker is celebrated every week at the Safety Weekly Operating Review (WOR), submitted via the Enterprise Safety Recognition Program. This program recognized more than 72 proactive safety behaviors that potentially prevented serious injuries or fatalities. This is a 47% increase from 2024, the same period.
  - Monthly Third Thursdays in Operations functional areas continued to cultivate psychological safety and confidence among frontline teams to speak up by having safety conversations, completing safety/compliance training, reviewing safety incidents and near hits, and fostering a safety mindset.
  - Continued readiness development for the November 2025 launch of the Critical Incident Stress Management (CISM) program that will support our coworkers' psychological safety and well-being in the event of a crisis.
    - An additional 27 CISM volunteers were trained and certified by the International Critical Incident Stress Foundation (ICISF).
    - Conducted 23 successful internal outreach engagements.
    - Developed a SharePoint site to promote and share resources for the CISM program.
    - Created a CISM Telephonic Helpline as another mechanism for coworkers to contact program resources when a critical or traumatic event occurs.
    - Established Mental Health Advisory Committee to bring together voices from across PG&E, including union partners, Grassroots, frontline coworkers, HR, EH&S and functional area leaders to make mental health part of how we work safely every day. The committee focus areas include breaking the stigma, normalizing open conversations and speak-up culture
    - Building tools and providing resources
    - Integrating mental health, psychological safety and physical health under Total Coworker Health & Safety

**Pursuant to recommendation #3:**

- Incorporating new safety-related training modalities, actions completed in Q3 include:

- PG&E continues to change its focus from a behavior-based safety program to align to the Edison Electric Institute's (EEI) SIF Classification and Learning Model (SCL Model). The SCL Model identifies high-energy hazards (Stuff That Kills You – STKY) and determines whether an Essential Control is in place for each high-energy source. In the 3<sup>rd</sup> quarter, PG&E retired the SafetyNet tool and adopted the Mirata tool for documenting all High-Energy Control Assessments (HECAs) and Energy Based Observations (EBO).
- HECAs and EBOs are conducted in the field to ensure that all Essential Controls are in place and function to build the capacity to fail safely. The Enterprise Health & Safety Field Safety Specialists and the Assurance team are using the engagements/observations as an opportunity to teach the workforce about high-energy hazards, essential controls, and the capacity to fail safely.
- PG&E continued expanding training modalities and implementing new hands-on training initiatives for coworkers. Examples of hands-on training initiatives in Q3 are listed below:
  - The updated Barehand Training Refresher is a five-day program combining classroom instruction and fieldwork on energized 60-kV to 500-kV lines. This course was successfully delivered and piloted in Q3. It equips participants with essential barehand techniques for insulator replacement, conductor repair, and general maintenance.
  - The Hydro Operator in Training (HOIT) Apprenticeship Program is currently being enhanced to include a new SCADA Simulator. This tool allows Hydro Operators in Training to safely practice SCADA operations in a controlled environment. Training scenarios include responding to communication loss, elevated water levels, and basement flooding events.
  - Metal Inert Gas (MIG) Welding 1 is a four-day, immersive training course designed to build foundational skills for Apprentice Electrical Machinists. The course combines structured instruction with extensive hands-on practice, two to three hours of guided lessons followed by six to seven hours of welding application each day. This training ensures participants develop safe and proficient MIG welding techniques as part of the broader Apprentice Machinist program.
  - Substation 101, developed in Q3, is a one-week hands-on course tailored for coworkers outside the primary line of business who may need to access substations. The training provides essential knowledge and procedural guidance to support safe, compliant, and effective visits to PG&E substations for operational, observational, or support-related purposes.
  - Pigging Operations is a newly developed course that provides hands-on instruction on how to safely perform pigging operations for both in-service and out-of-service scenarios. Training focuses on hazard identification, loading, launching, receiving, and unloading pigging devices.
  - Chromatotec Sulfur Gas Chromatograph is a new training that provides PG&E Gas Control Technicians with instruction on the use and maintenance of the Chromatotec Sulfur Gas Chromatograph. This equipment delivers live sulfur level readings in the system, which is critical

for ensuring proper gas odorization to detect leaks. The course combines classroom instruction on gas chromatography theory with hands-on practice in live equipment maintenance and natural gas sample analysis.

- The summary below includes key training statistics for Q3 2025:
  - A total of 49,384 PG&E employees and contractors completed training programs, contributing to 1,010,840 hours of training. It is important to note that a reporting error was identified in the Q2 training data. The corrected number of training hours completed through Q2 2025 is 684,184 hours.
  - The percentage breakdown of hours by delivery mechanism was:
    - 31% online training (web-based training, virtual learnings, or recorded webcasts) conducted through a work computer or mobile device.
    - 66% hands-on instructor-led training.
    - 3% tailboard completions and PG&E Leadership Town Hall attendance, a required meeting for PG&E leaders, which we tracked through our learning management system.
- Conducting post-training peer learning activities, actions completed in Q3 include:
  - PG&E's Operations Safety Collaboration Center (OSCC) continued the Stuff That Kills You (STKY) Frontline Safety Culture Program which started in October of 2024, first in Gas Operations and Electric System Inspection. This Program has transitioned to internal safety culture mentors, which were hand selected to provide safety culture mentoring. These mentors are assigned to Operations and other functional areas which experienced serious injury events in 2024. We currently have 31 mentors in place that cover the following functional areas: Electric Operations, Gas Operations, Power Generation, Engineering Planning & Strategy, Information Technology, Materials, and Enterprise Health & Safety. In Q3, conducted a survey with mentors and mentees to obtain feedback on the program and identify areas of success as well as opportunities for continuous improvement.
  - PG&E functional areas have continued to host Third Thursdays in Q3. Third Thursdays, which are executed monthly, provide opportunities to improve safety culture through intentional and well-planned safety engagements. Third Thursdays continue to be a forum where coworkers share information regarding incidents and near hits, expand upon training, share best practices, and focus on safety. The Third Thursday Toolkits and best practices are continuously adapting and maturing through cross-functional collaboration, which is promoted through groups such as the OSCC and the PG&E Grassroots-Led Safety Council.
  - The Grassroots-Led Safety Council continues to hold ad-hoc council meetings limited to grassroots council members to discuss and make progress on ongoing initiatives. The council is also still holding quarterly executive meetings to update key executive stakeholders on their progress with ongoing and new initiatives and to request support and backing, when necessary. The most recent Grassroots-Led Safety Council Executive Meeting occurred on September 22, 2025, in San Ramon and focused on Grassroots members' continued efforts on several frontline focused initiatives such as, but not limited

- to, snake bite prevention and awareness, wheel chock awareness campaign, enterprise-wide Starlink integration and lone worker solutions, driving rodeos, and establishing a grassroots charter review sub-committee.
- The Grassroots-Led Safety Council completed its series of regional Grassroots Coaching and Partnering sessions in the PG&E territory, with the final session held in August. The sessions focused on frontline safety culture, the energy wheel, and workforce fail safe capacity. Goals of these sessions included enabling the removal of barriers, building relationships, and strengthening partnerships between all PG&E Grassroots members through culture training, interactive scenarios, and building confidence, skills, and expertise.
  - The OSCC team continued to make progress on the 2025 Areas for Improvement (AFI). The AFIs for Human Performance Tools Pre-Job Safety Briefing, High-Energy Gravity Line of Fire, and Organizational Culture and Safety Mindset also continued. Additional AFIs were added to support increased trends in gravity-related events, such as ladder safety and tower safety. Q3 highlights included 25 PG&E coworkers attending a three-day culture change workshop in September and the launch of job site safety analysis pilots. An emergent AFI for Tower and Ladder Falls was added in Q3, with stakeholders and subgroups identified. AFIs have leads and co-leads from Gas Operations, Electric Operations and Enterprise, Health and Safety. The AFIs are reviewed and guided by the Operations core team members, sponsor, and executive teams monthly.
  - PG&E collects feedback from coworkers about training through multiple channels including post-training surveys, post-pilot feedback, training alignment, apprenticeship committees, and PG&E's Corrective Action Program. The Academy reviews this feedback and makes the appropriate updates to training during the training's regular maintenance cycle or as a part of break-in work as needed. PG&E Academy updated 108 courses in Q3 in support of instructor and student feedback. Additionally, PG&E uses the Kirkpatrick Model to assess training effectiveness, primarily through Level 1 (Student Satisfaction) and Level 2 (Knowledge and Skill Transfer) evaluations. Selected courses also include Level 3 (On-the-Job Application) and Level 4 (Business Impact) evaluations. We use the results of these training effectiveness evaluations to continuously improve training.
  - Cultivate a mentoring program, actions completed in Q3 include:
    - Enterprise Health and Safety continued progress on its Field Safety Specialist Mentor program in Q3. There are currently 18 Field Safety Specialists enrolled in the mentorship program, which includes 34 modules, with the first being Fire Danger Precautions. To complete the Fire Danger Precautions module, field safety specialists are required to review the applicable standard; complete web-based training; have discussions with a mentor where the mentee must explain the Fire Potential Index, Wildfire Mitigation Matrix, and their uses; and additional mitigation measures required for Risk Level 4 and higher risk ratings. An observation of the mentee performing and documenting a field observation in an area with elevated fire danger is also required before the module is completed. As one of the final steps required to complete the program, mentees meet with the Sr. Director of Operational Safety to discuss their learnings and

safety culture. Initial feedback from mentees in the program has been positive. Mentees feel the consistent approach to their development has helped build a solid foundation of initial skills. As a result, examples of Q3 field engagements demonstrated improvement in the quality of observations and interactions with the functional areas.

**Pursuant to recommendation #4:**

- Recognize and take action to mitigate the risk exposure posed by interactions with the public, actions completed in Q3 include:
  - Our Ballistic Vest Program Manager continues to conduct outreach to our coworkers with the highest exposures working in high crime areas. Year to date 95 vests have been issued as part of the program. 35 were provided during the third quarter. Feedback from coworkers indicates they feel much safer, especially responding to dangerous areas after hours.
  - Hostile Environment Awareness Training continues to be shared with coworkers. This interactive in-person training put coworkers in controlled hostile environments. In the third quarter, there were 15 sessions throughout the service territory.
  - The De-escalation Virtual Reality training program puts coworkers in a virtual environment that exposes them to hostile customers and environments. 1,500 students have completed this training.

PG&E remains dedicated to continually improving our safety culture and will continue to provide further information on our progress each quarter.

**Board of Directors' Safety and Nuclear Oversight Committee – Q3 2025 Update**

The PG&E Board of Directors' Safety and Nuclear Oversight (SNO) Committee is an important part of our Board-level oversight of safety, enterprise risk, and other matters. A SNO Committee also concurrently exists at the PG&E Corporation Board (collectively referred to as the SNO Committees).

This section describes the oversight activities of the SNO Committees and is organized as follows:

- 1) Safety Topics Covered in SNO Committees' Meetings; and
- 2) Recommendations of the SNO Committees and Management Implementation.

**Safety Topics Covered in SNO Committee Meetings**

During the third quarter, the SNO Committees held both a joint meeting with the Audit Committees and a stand-alone meeting on September 16, 2025.

During the September joint meeting, the SNO and Audit Committees reviewed the Ethics and Compliance program and received an update from the Lead Chair of the Grassroots Safety Council.

During the September stand-alone meeting, the SNO Committees received an update on safety, including nuclear safety. The Committees also discussed the following risks from the Enterprise Risk Register:

- Loss of containment – gas transmission and distribution, large overpressure event
- Failure of electric distribution overhead
- Public contact with intact energized electrical equipment
- Cybersecurity

Lastly, the Committees received updates on business continuity and IT disaster recovery, and the electric asset registry.

### **Recommendations of Boards of Directors' Safety Committee Meetings During Q3 2025**

There is an ongoing dialogue between the Chair of the SNO Committees (which includes feedback of the Committees' members) and management, with frequent engagement around the implementation of the workforce safety strategy, safety performance updates, and corrective actions in the normal course of business. In addition, the SNO Committees made the following specific, safety-related recommendations to management during the third quarter of 2025:

- Maintain focus on business continuity plans through the transition of major IT system projects, which include SAP and GIS; and
- Consider the use of technology and innovation such as ground-based LiDAR especially in urban areas to improve geospatial accuracy in the asset registry.

### **Management Implementation of Recommendations Described in Q2 2025 Quarterly Notification**

The following summarizes actions that management has taken to implement guidance and direction from the SNO Committees that was described in our Quarterly Notification for the second quarter of 2025.

Recommendation # 1: Embed safe driving route planning for the workforce as part of pre-job safety briefings.

#### **Management's response:**

- We have integrated daily discussions on road hazards and route planning into our morning tailboards, replacing the previous practice of including these topics in pre-job briefs. This adjustment ensures that we address driving hazards encountered from the service centers to the job sites, which pre-job briefs often missed.
- MAPS+ is undergoing an upgrade to incorporate geo-fencing capabilities. This new feature will send road hazard warnings to coworkers based on their real-time locations as part of the Enterprise Safe Access Program (ESAP). This functionality

will be similar to Waze™, enabling coworkers to view identified road hazards along their travel routes to work locations and job sites. We anticipate completing the MAPS+ upgrade by December 15, 2025.

Recommendation # 2: Continue to improve upon the completeness and accuracy of electric and gas asset registries and share the progress updates with the Committee.

Management's response:

Before 2010, the PG&E's Gas organization faced poor system integration, paper-based processes, fragmented records, and limited analytics, leading to inconsistencies and inaccurate documentation—highlighted by industry-shaping incidents like San Bruno. For Electric, similar challenges existed, particularly in the completeness and accuracy of asset data, which became increasingly critical with the emergence of wildfire risk.

These issues prompted the adoption of Asset Management practices and Gas' first ISO 55001 (PAS 55) Certification in 2014.

In 2017, the newly created Data Asset Family began drafting the Gas Asset Register (AR), completed in 2019, this collection of data assets represents Gas' mission critical and business critical data. We have been working to improve the quality of that data ever since. In 2021, the ARMS project linked GDGIS and CC&B and as a result 17.2K+ meters (and their services) were added to GDGIS. In 2022, Gas Data Management launched the SAP-GIS Alignment Dashboard to identify record discrepancies for remediation, resulting in a 7.4% improvement in alignment to date.

Today we have a comprehensive strategy to address asset register data gaps through the following programs:

- Data management strategies like Strategic Data Plans (SDPs) for risk-based dataset management, targeted data remediation, and new technologies and AI tools for data quality.
- Gas Mapping continues to contribute. This year alone they have made more than 15,600 updates through the As-Built Process, 3,510 corrections from CAP, and 2,787 RW updates that directly update SAP.
- Leveraging the mobile As-Built process is currently our most effective method for capturing high-quality data from the field and ensuring accuracy throughout the collection process.

As presented at the September Board meetings, we provided a comprehensive update on the Electric Asset Registry, highlighting key advancements in wildfire risk management and data remediation.

Electric Asset Registry Highlights:

- Since 2019, PG&E has prioritized High Fire Threat Area (HFRA) assets, validating and geospatially realigning all Transmission (Tx) and Distribution (Dx) primary structures using LiDAR and inspections.
- Over 11 million historical Tx component attributes have been collected, and 130,000 critical customer outage notification inaccuracies have been corrected.
- ISO 55001-certified processes now deliver new data into the registry in 52 days on average (down 40% since 2022) with a 95% quality rate (up 6% year over year).
- Digital automation initiatives, including Propel and Elevate, are underway to further enhance data accuracy and timeliness.

While significant progress and investment have been made to remediate business-critical data gaps, continued implementation of digital as-built job package technology, development of a critical data inventory, and the use of Artificial Intelligence (AI) to perform AR data validation are needed to progress the program.

As mentioned above, an update on the electric asset registry was provided to the Committee at the September SNO Committee meeting. A similar presentation on the gas asset registry is scheduled to be provided to the Committee in December.

**Conclusion**

We appreciate the opportunity to provide these updates on our progress implementing our WMP, the latest Safety Culture Assessment, and the SNO Committees' recommendations from the previous quarter. If there are any questions, please feel free to contact Wade Greenacre at [wade.greenacre@pge.com](mailto:wade.greenacre@pge.com).

Sincerely,

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/S/

Meredith Allen  
Vice President, Regulatory Affairs

Appendix 1 - 2025 WMP Initiative Commitments

cc: Service Lists I.19-09-016, I.15-08-019, R.21-10-001, and R.18-10-007



**APPENDIX 1: 2025 WMP Initiative Commitments**

Plan Area	2025 WMP Commitments <sup>6</sup>			
<b>A. Situational Awareness and Forecasting</b>	SA-02 - Line Sensor - Installations	SA-05 - Evaluate FPI and IPW Modeling enhancements	SA-07 - Monitor and evaluate the Cameras AI system's performance	SA-09 - EFD and DFA Reporting
	SA-10 - Distribution Fault Anticipation (DFA) Installations	SA-11 - Early Fault Detection (EFD) Installations		
	AI-01 - Retainment of Inspectors and Internal Workforce Development	AI-02 - Detailed Inspection Transmission – Ground	AI-04 - Detailed Inspection Transmission – Aerial	AI-05 - Detailed Inspection Transmission – Climbing
	AI-06 - Perform transmission infrared inspections	AI-07 - Detailed Ground Inspections - Distribution	AI-08 - Supplemental Inspections - Substation Distribution	AI-09 - Supplemental Inspections - Substation Transmission
	AI-10 - Supplemental Inspections - Hydroelectric Substations and Powerhouses	AI-11 - Filling Asset Inventory Data Gaps		
<b>B. Grid Design, Operations and Maintenance</b>	GH-01 - System Hardening - Distribution	GH-02 - Evaluate Covered Conductor Effectiveness	GH-04 - 10K Undergrounding	GH-05 - System Hardening – Transmission
	GH-06 - System Hardening - Transmission Shunt Splices	GH-10 - Non-Exempt Expulsion Fuse - Removal	GH-11 - System Hardening – Transmission Conductor Segment Replacement	
	GM-01 - Asset Inspections - Quality Assurance	GM-03 – Eliminate HFTD-HFRA Distribution Backlog	GM-06 - EPSS - Down Conductor Detection (DCD)	GM-07 - Updates on EPSS Reliability Study
	GM-09 - Asset Inspection-Quality Control			

<sup>6</sup> Status color: Blue = “Completed on Time” - pending validation; Green = “On Track” – meets target; Amber = “At Risk” - not on track to meet target but has a catch back plan; Red = “Off Track / Missed” – not meeting target and does not have a catch back plan; Gray = Initiative has not started yet.

Plan Area	2025 WMP Commitments – Continued			
<b>C. Vegetation Management and Inspection</b>	VM-01 - LiDAR Data Collection - Transmission	VM-02 - Pole Clearing Program	VM-03 - Focused Tree Inspection Program	VM-04 - Tree Removal Inventory
	VM-05 - Defensible Space Inspections - Distribution Substation	VM-06 - Defensible Space Inspections - Transmission Substation	VM-07 - Defensible Space Inspections - Hydroelectric Substations and Powerhouses	VM-08 - Vegetation Management – Quality Verification
	VM-09 - Constraint Resolution Procedural Guideline	VM-13 - Routine Ground - Transmission	VM-14 - Transmission Second Patrol	VM-15 - Integrated Vegetation Management - Transmission
	VM-16 - Distribution Routine Patrol	VM-17 - Distribution Second Patrol	VM-18 – VM for Operational Mitigations (VMOM)	VM-22 - Vegetation Management – Quality Control
<b>D. Public Safety Power Shut off</b>	PS-01 - Evaluate enhancements for the PSPS Transmission guidance	PS-02 - Evaluate incorporation of approved IPW enhancements into the PSPS Distribution guidance	PS-06 - Provide batteries to PG&E customers	PS-07 - PSPS Customer Impact Reduction
	PS-10 - Continue sharing PSPS lessons learned			
<b>E. Emergency Preparedness Plan</b>	EP-01 - Complete PSPS and Wildfire Tabletop and Functional Exercises	EP-02 - Maintain all hazards planning and preparedness program	EP-04 - Expand all hazards planning to include additional threats and scenarios	EP-06 - Review, and revise the CERP and 2 Wildfire Related Annexes on a yearly basis
<b>F. Community Outreach and Engagement</b>	CO-01 - Community Engagement – Meetings	CO-02 - Community Engagement - Surveys		