

Vegetation Management Priority Tag

SUMMARY

This utility procedure provides instructions for Vegetation Management (VM) employees and Contract Partners (together, Personnel) on how to assess Priority 1 and Priority 2 vegetation conditions while performing patrols.

The instructions in this procedure do not override any patrol requirements that are defined in VM standards and procedures.

Level of Use: Informational Use

TARGET AUDIENCE

- VM personnel who are responsible for vegetation compliance around overhead electric distribution facilities that include but are not limited to:
 - VM Managers and Senior Managers
 - Vegetation Program Managers (VPMs)
 - VM Inspectors (VMIs)
 - VM Supervisors
 - Vegetation Program Leads (VPLs)
 - Tree Crews (TCs)
 - Database Management Specialists (DMS)

SAFETY

Use caution when approaching and assessing Priority conditions. Stay alert at all times. Priority conditions are unpredictable and can be life-threatening.

BEFORE YOU START

One VM is the system of record for this procedure.

The Priority Tag Tool will remain for those Personnel not working in One VM. However, Personnel working in One VM will not have access to the Priority Tag Tool.

To get access to One VM, GO TO the [One VM Info Hub](#) (Employees) OR [VM Core Share](#) (Contract Partners).

Vegetation Management Priority Tag

TABLE OF CONTENTS

SUBSECTION	TITLE	PAGE
1	Timelines for Mitigating Priority Tag Conditions.....	2
2	Identifying and Classifying Priority Level Conditions.....	2
3	Determining When to Coordinate With the Local OEC	3
4	Handling Priority 1 Conditions	4
5	Handling Delays and Interferences with Priority 1 Mitigation	5
6	Handling Priority 2 Conditions for Major Woody Stems (MWS)	5
7	Handling Priority 2 Conditions	6
8	Handling Changes to Priority Classifications	8
	Appendix A, Priority Tag Mitigation Plan Template	13

PROCEDURE STEPS

1 Timelines for Mitigating Priority Tag Conditions

1.1 APPLY the following time requirements to each of the Priority conditions:

- Priority 1 Tags must be mitigated within 24 hours of being inspected.
- Priority 2 Tags must be mitigated within 20 business days unless constrained.

NOTE

IF a Priority 2 Tag has been constrained,
 THEN an additional 20 business days is granted from the resolution date to mitigate the Priority 2 Tag.

2 Identifying and Classifying Priority Level Conditions

2.1 The First Responder must PERFORM the following steps:

1. ASSESS the condition of the vegetation. Vegetation is categorized as either a whole tree or portion of a tree.
2. Based on the assessment, CHOOSE a Priority Level option that applies to the observed condition (SEE Table 1, "Selecting a Priority Level.")

Vegetation Management Priority Tag

Table 1. Selecting a Priority Level

Options	Criteria
Priority Level 1	1. ASSIGN a Priority 1 Tag if an observed condition meets at least one of these scenarios: <ol style="list-style-type: none"> a. The vegetation is in contact or showing signs of previous contact (e.g., burn back) with a primary conductor. b. The vegetation is actively failing or at immediate risk of failing and could strike the facilities. c. The vegetation presents an immediate risk to the facilities.
Priority Level 2	1. ASSIGN a Priority 2 Tag if the condition meets one of these scenarios: <ol style="list-style-type: none"> a. The vegetation has encroached within the PG&E minimum clearance requirements, AND it also meets these two criteria: <ul style="list-style-type: none"> • Is NOT in contact with a conductor • Does NOT have signs of contact b. The vegetation has an identifiable integrity issue that does NOT classify as a Priority 1 condition, is likely to strike facilities, AND probable to fail within 60 calendar days of inspection.
Unsure Which Priority Level to Assign	1. IF unsure which Priority tag applies, THEN ASSIGN a Priority 1 Tag.

3 Determining When to Coordinate With the Local OEC

3.1 IF the [Operational Emergency Center](#) (OEC) is open,

AND the condition of the tree is related to an event,

THEN the First Responder must:

1. EXIT this procedure.
2. COORDINATE with the local OEC to mitigate the condition.

3.2 IF any Priority trees related to an event are found after the OEC closes,

AND the appropriate order numbers are still open,

THEN the First Responder must:

1. EXIT this procedure.
2. COORDINATE with the local OEC for mitigation and billing (if order numbers are still open).

Vegetation Management Priority Tag

4 Handling Priority 1 Conditions

4.1 CONSIDER each Priority 1 condition as an emergency location (e.g., a wire down condition).

4.2 The First Responder must:

1. CONTACT the local VM Supervisor or VPL.
 - a. If there is an interference, CONTACT the VPM (REFER to the steps in Section 5, "Handling Delays and Interferences with Priority 1 Mitigation.")
2. STAY onsite unless an unavoidable reason exists.
 - a. The situations listed below are appropriate safety reasons to leave a site unattended:
 - Extreme weather conditions
 - The orchard owner has sprayed a chemical that requires a re-entry interval greater than 24 hours or when re-entry is authorized by a PG&E representative (e.g., VM Supervisor, VPL, or VPM).
 - An interference/hostile Customer
 - The site is a remote location that requires leaving to get cellular service.
 - b. To leave a site unattended within the 24-hour period for any other reason than what is listed above, REQUEST authorization from a PG&E representative.

NOTE

The VMI may continue to patrol in the nearby area while waiting for a Tree Crew to arrive on site.

3. COORDINATE hazard mitigation activities (e.g., pruning or removal).

4. CREATE a tree record OR

CALL the local DMS (or Delegate) to create the tree record.

4.3 The local DMS (or Delegate) must:

1. GENERATE and ISSUE a Priority 1 Tag to TCs.
 - a. IF a Priority tree creates a redundancy of work in the system,
THEN close any prior prescriptions that have not been worked.

Vegetation Management Priority Tag

4.4 The TC must:

1. USE professional judgement and best management practices to mitigate the Priority 1 Tag within 24 hours of the initial report (REFER to the [TD-7102P-01-JA01, "Best Management Practices \(BMP\) for Vegetation Management Activities"](#) Job Aid.
2. IF unable to mitigate the hazard within 24 hours,

THEN GO TO the steps in Section 5, "Handling Delays and Interferences with Priority 1 Mitigation" below.

5 Handling Delays and Interferences with Priority 1 Mitigation

5.1 NOTE that efforts to mitigate Priority 1 Tag must not be delayed by:

- Customer or Agency objections
- Environmental processes, bird nests, permits (city/county), or similar conditions
- Encroachment permitting process

5.2 IF the Priority 1 Tag cannot be mitigated within 24 hours,

THEN the First Responder must DISCUSS the delay with a PG&E Manager or Senior Manager.

5.3 The First Responder (or Delegate) must perform one of the following steps:

1. ENSURE TC arrives onsite to work tree.
2. CREATE and RECEIVE approval for a mitigation plan if the P1 cannot be mitigated within 24 hours.
 - a. IF A PG&E Representative creates a mitigation plan,

AND a PG&E Manager or Senior Manager approves the plan,

THEN The Priority 1 Tag MAY BE MITIGATED beyond the 24 hour period.
 - b. FOLLOW the mitigation plan outlined in Appendix A, "Priority Tag Mitigation Plan Template."

6 Handling Priority 2 Conditions for Major Woody Stems (MWS)

1. IF a Priority 2 tree meets the MWS exemption criteria AND is recorded in the system record with a MWS exemption,

THEN the First Responder must EXIT this procedure. This procedure does not apply to Priority 2 trees with MWS exemptions.

Vegetation Management Priority Tag

NOTE

Trees with valid Major Woody Stems exemptions are NOT priority trees.

2. REFER to the [TD-7102P-01-Att03, "Exemptions to Minimum Distance Requirements \(MDR\)"](#) attachment for more information.

7 Handling Priority 2 Conditions

7.1 The First Responder must CREATE a tree record OR

CALL the local DMS (or Delegate) to create the tree record.

7.2 IF restrictions, constraints, OR conditions are applied to the tree record,

THEN DO NOT apply the 20 business day timeline.

1. These restrictions/constraints/conditions include but are not limited to:

- Clearance Request: Line clearance constraints (i.e., line kill, line drop).
- Interference: When a customer/property owner interferes with PG&E performing pre-inspection work or completing 100% of the work prescribed.
- Environmental: An environmental issue (e.g., riparian review or nesting bird).
- Access: The site cannot be accessed (e.g., snow, traffic, or a locked gate).
- Agency: If the tree is on applicable agency land and awaiting permit, mitigation can be extended beyond the 20 business day timeline.

- However, if all efforts are unsuccessful to resolve after 60 business days the VM Team may change the prescription to P1 and mitigate it according to P1 requirements (i.e., emergency), unless all parties agree to a longer timeline.

- IF agreeing to a longer timeline,

THEN ROUTE the Agency constraint to the Vegetation Asset Strategy and Analytics (VASA) and VM Risk teams for approval.

- P2s that require agency permits should be submitted by VM Ops within 7 business days from inspection. Any P2s that are submitted after 7 business days will impact when it can be released as a P1 equal to the days submitted past 7 business days. (e.g., a P2 submitted at 10 business days can be released as a P1 after 63 business days).

Vegetation Management Priority Tag

- Notification to permitting (i.e., Land Planning or EPWC) should be made when a P2 is changed to a P1 prior to work being completed.
- The 60-business day mitigation timeline applies to all Agencies that permit PG&E work, including but not limited to:
 - Bureau of Land Management (BLM)
 - US Forest Service (USFS)
 - National Park Service (NPS)
 - Bureau of Reclamation (BOR) - Including Department of Water Resources (DWR) administered by BOR
 - Caltrans
 - State Parks (SP)
 - California Department of Fish and Wildlife (CDFW) managed lands
 - Coastal Zone (CZ)
 - San Francisco Public Utilities Commission (SFPUC)
 - East Bay Regional Park District (EBRPD)
 - East Bay Municipal Utility District (EBMUD)
 - Federal Energy Regulatory Commission (FERC) boundaries
 - San Mateo County Parks (SMCP)
 - Local cities or counties (encroachment permits)

NOTE

IF trees are signed up for removal as a result of growth and not failure,

THEN when changing to a P1 after 60 business days, NOTE that the preferred mitigation option is Prune rather than Removal.

2. ENSURE that the local OEC parameters DO NOT apply to the Priority 2 condition (SEE Section 3, "Determining When to Coordinate With the Local OEC" above.)

- 7.3 The local DMS (or Delegate) must GENERATE AND APPROVE a Priority 2 Tag (i.e., Work Request/Work Order).

Vegetation Management Priority Tag

- 7.4 The TC must create a service appointment (if necessary) and physically MITIGATE the tagged conditions within 20 business days of the record being created unless an appropriate restriction/constraint is documented in the system of record.
- 7.5 The TC must UPDATE the Work Request or Work Order and prescription with the completion date and trim code and mark as complete.

8 Handling Changes to Priority Classifications

- 8.1 IF the Priority classification is changed at any point in the mitigation process,
THEN the DMS or VPM must:
1. CREATE the tree record to reflect the change in Priority.
 2. CLOSE any previous active prescriptions with explanation for de-listing.

END of Instructions

DEFINITIONS

Abrasion: Damage to insulation resulting from friction between vegetation and conductors. Scuffing or polishing of the insulation or covering is not considered abrasion.

Delegate: Can be Employees or Contract Partners (together, Personnel) within the VM FA.

Constraint: A situation that occurs when an environmental concern or local government or agency obstructs or delays PG&E inspection work or the completion of the intended tree work

Contract Partner: Company directly hired by PG&E to complete a specific scope of work or service. This term also applies to all subcontract partners, at any tier, which have been retained by a primary PG&E contract partner to provide a service for PG&E related project work. Additionally, the term "subcontract partner" may include an individual, a group of workers (crew), equipment or other items used on a PG&E facility, project, or assets.

Facility (Distribution): The components of the electric distribution overhead system, including the pole/support structure, Primary Conductors, voltage-regulating equipment, primary and common neutrals (see GO 95, Rule 33.1), switching equipment, transformers, and Secondary Conductors. Refer to TD-8105, "Distribution Line Overhead Asset Management Plan" for additional details.

First Responder: A PG&E VM employee or Contract Partner in the field who identifies or responds to a Priority vegetation condition and can document the incident in the system of record.

Vegetation Management Priority Tag

Interference: A situation that occurs when a customer or property owner refuses to allow PG&E to perform VM work or complete 100% of the work required to bring the site into compliance with PG&E Standards. A VMI or TC member should never imply or assume an interference due to lack of contact such as a locked gate or multiple door tags left with no reply.

Major Woody Stem (MWS): A trunk or limb at least 6 in. in diameter at the conductor level, on a tree at least 10 in. DBH and at least 10 years old.

Minimum Distance Requirement: Distance to maintain separation between vegetation and distribution conductors in Local Responsibility Areas (LRAs), SRAs, HFTDs, FRAs, and HFRAs, in accordance with GO 95, Rule 35, PRC 4293, and PG&E standards. See the TD-7102S-Att01, "Minimum Distance Requirement (MDR)" attachment.

Priority (Tag): Conditions that may result from either encroachment into the Pacific Gas and Electric Company (PG&E) minimum clearance requirement or from potential tree or limb failure. The following time constraints apply to each of the Priority conditions:

- Priority 1 tags must be mitigated within 24 hours of identification when reported.
- Priority 2 tags must be mitigated within 20 business days, unless constrained.

Priority 1 Code: Priority code applied when any of the vegetation conditions defined in Section 1.1 are observed in the field for overhead electric distribution facilities.

A PG&E Vegetation Management Priority 1 classification aligns with CPUC General Order (G.O.) 95, "Reporting and Resolution of Safety Hazards Discovered by Utilities," Rule 18, Priority Level 1 definition as stated: An immediate safety and/or reliability risk with high probability for significant impact. Act immediately, either by fully repairing the condition or by temporarily repairing and reclassifying the condition to a lower Priority.

Priority 2 Code: Priority code applied when any of the vegetation conditions defined in Section 1.1 are observed in the field for overhead electric distribution Facilities.

A PG&E Vegetation Management Priority 2 classification aligns with and often exceeds the CPUC General Order (G.O.) 95, "Reporting and Resolution of Safety Hazards Discovered by Utilities," Rule 18, Priority Level 2 definition as stated: A variable (non-immediate high to low) safety and/or reliability risk. Take action to correct within a specified time period (fully repair, or by temporarily repairing and reclassifying the condition to a lower Priority). The time period for correction is to be determined at the point of identification by a qualified company representative (overhead: 0-59 months).

Work Request: A record requesting specified vegetation work to be completed by a Tree Crew.

Vegetation Management Priority Tag

IMPLEMENTATION RESPONSIBILITIES

VM Operations is responsible for the implementation, communication, and maintenance of this utility procedure.

The VM Manager must communicate this procedure to the VM stakeholders.

The VM Supervisor must communicate this procedure to the operational work teams.

GOVERNING DOCUMENT

[Utility Standard TD-7102S, "Distribution Vegetation Management Standard"](#)

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

Records and Information Management:

PG&E Data, Information, and Records are company assets that must be traceable, verifiable, accurate, and complete and can be retrieved upon request. Functional Areas are responsible for complying with the Information & Records Governance Policy, Standards, and the Information and Records Retention Schedule. Refer to [GOV-7101S, "Enterprise Records and Information Management Standard"](#) for further guidance or contact Information & Records Governance at Information&RecordsGovernance@pge.com.

California Public Utilities Commission (CPUC), [General Order 95, Rule 35](#)

California Public Utilities Commission (CPUC), [CPUC General Order 95, Rule 18](#)

California Public Resources Code (PRC), sections [4292](#) and [4293](#)

REFERENCE DOCUMENTS

Developmental References:

TD-7102S, "Vegetation Management Distribution Program"

Supplemental References:

TD-7102P-01, "Vegetation Management Distribution Inspection"

TD-7102S-Att03, "Attachment 1, Minimum Distance Requirement (MDR)"

TD-7102P-01-JA01, "Best Management Practices (BMP) for Vegetation Management Activities"

[One VM Info Hub](#)

[VM Core Share](#)

Vegetation Management Priority Tag

APPENDICES

Appendix A, "Priority Tag Mitigation Plan Template"

ATTACHMENTS

NA

DOCUMENT REVISION

Utility Procedure TD-7102P-17, "Vegetation Management Priority Tag Procedure," 02/24/2021, Rev. 1

Job Aid TD-7102P-17-JA01, "Work Packet Generation and Soft Closure of a Work Request," 10/09/2020, Rev. 0

DOCUMENT APPROVER

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Vegetation Management Priority Tag

REVISION NOTES

Where?	What Changed?
Entire document	Edited for simplicity and clarity
Before You Start Section	Added note about One VM being the system of record.
Section 1	Organized Priority conditions into a table.
Section 2	Added to first bullet: orchard owner has spayed a chemical that requires a re-entry interval greater than 24 hours, it has rained, is raining or the orchard owner has or is irrigating). Removed interference/hostile from first bullet and made it a second bullet.
Section 4	Updated content to reflect new system of record. Added Note that VMI can continue to patrol while waiting for a Tree Crew to arrive on site.
Section 6	Added NOTE that trees with valid MWS exemptions are not priority trees.
Section 7	Updated content to reflect new system of record.

Vegetation Management Priority Tag

Appendix A, Priority Tag Mitigation Plan Template Page 1 of 1

First Responder Name:
LAN ID:
Phone Number:
Company Name:
Regional Manager:
Description of Priority 1 Condition:
Plan for Mitigating P1 Condition: