

Vegetation Control

SUMMARY

The Pacific Gas & Electric Company (PG&E) Vegetation Control (VC) program maintains firebreaks in accordance with [California Public Resources Code \(PRC\) 4292](#) and PG&E [Wildfire Mitigation Plan](#) (WMP) commitments. To maintain this compliance, PG&E performs year-round pole clearing activities. This utility procedure describes the steps that VC performs to ensure that PG&E is compliant with PRC § 4292 and additional WMP risk reduction commitments.

Level of Use: Informational Use

TARGET AUDIENCE

VC Contract Partner Supervision personnel
VC Field Technicians
Database Managers (DMSs)
General Foremen (GF)
VC Vegetation Program Managers (VPMs)
VMI Vegetation Management Inspectors (VMIs)
VOI Vegetation Operations Inspectors (VOIs)
Quality Management (QM) Personnel

SAFETY

Any person in charge of personnel working in a Utility Fire Potential Index (FPI) Rating area must be aware of changing local meteorological conditions. The person in charge must also be aware of the increased fire potential when work is in progress. For Fire Precautions and Restrictions in Hazardous FPI Rating Areas, see [EMERG-4102S, "Preventing and Mitigating Fires While Performing PG&E Work."](#)

During declared fire season, the VC Field Technician must:

- Keep a 5-gallon backpack-style pump and a round point shovel within 25 feet of the immediate work location.
- Ensure that they remain hydrated when working during hot days.
- Create a [Jobsite Safety Analysis](#) before working at the first location of the day and update it at each subsequent location.
- Perform a [360 safety degree walkaround](#) of the vehicle before moving it from a parked location.

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BEFORE YOU START

VC Field Technicians must have the Salesforce Authenticator and Lemur Pro Mapping applications installed on their iOS mobile device.

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PROCEDURE STEPS

1 Overview

Beginning every October, Subject Poles within State Responsibility Areas (SRA), California Public Utilities Commission (CPUC) High Fire Threat Districts (HFTD), the United States Forest Service portions of Federal Responsibility Areas (USFS-FRA), and PG&E High Fire Risk Areas (HFRA) will be initially cleared prior to fire preparedness declarations (**Initial Clear Cycle**) per the CALFIRE Unit and maintained (**Maintenance Cycle**) throughout declared fire season.

All exceptions must be documented accordingly in the system of record with site-specific details and explicit instructions for pole clearing crews to follow when they generate subsequent work request(s). Exceptions include, but are not limited to, the following:

- Risk Reduction Subject Poles where the only Subject Equipment installed are split-bolts AND/OR solid blade disconnects
- Risk Reduction Subject Poles assessed and documented as Low Risk per PG&E's Fire Risk Assessment Job Aid (SEE TD-7112P-01-JA01, "Fire Risk Assessment: Vegetation Control Pole Clearing)
- Sites impacted by snow or saturated soil conditions where work should be rescheduled
- Access-based and safety-based exceptions
- Document in One VM any schedule adjustments for Projects experiencing extended Fall/Spring growth (green-up)
- Documented constraint locations such as customer interference, agency constraints, environmental constraints, etc.
- Subject Equipment added or discovered after/outside the VC Inspection Cycle. Separate documentation and/or controls outside WMP commitments must be available upon request.

NOTE

Regardless of cycle, VC Field Technicians must ENSURE the documented data is Traceable, Verifiable, Accurate, & Complete (TVAC) AND synced daily in its entirety.

Regardless of origin, all incorrect information must be UPDATED (either in the field or in the back office) to be fully TVAC.

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2 Planning for Distribution Poles

2.1 Project Creation

Within One VM, this one-time process is completed in the back office by the Salesforce team.

1. IF PG&E Leadership expands the area in which this scope of work applies,
THEN the VPM must manually CREATE projects (REFER to the [One VM Vegetation Control \(VC\) User & Training Guides](#) SharePoint site for instructions.)

2.2 Cloning Projects

Once an annual project has been completed, PG&E Leadership (VPM) must manually CLONE the project for the following year. After a project is cloned, the Planned Date range and Unit counts will populate based on the actual dates and counts from the previous year.

2.3 Project Approvals

The VPM must APPROVE all projects annually prior to any work being completed by the assigned Field Vendor.

2.4 Forecast Project Date Ranges and Unit Counts

After cloning the annual projects and before the end of September each year, VC Vendor Leadership must POPULATE each project in One VM with their forecasted dates and unit counts. Forecasted dates and unit counts can be modified throughout the year with written VC Leadership approval.

2.5 Assigning Field Work

1. The GF or DMS must USE an area-based Service Appointment (SA) to assign to the VC Field Technicians via One VM Back Office.
 - a. IF multiple VC Field Technicians are assigned the same project,
THEN the GF must DIVIDE the work request into multiple SA's
AND ASSIGN the different SA's to multiple VC Field Technicians via the Back Office One VM app.

3 Planning for Transmission-Only Subject Poles

1. On a monthly basis, VC Leadership must REQUEST an updated list of transmission pole/structure locations where switches have been installed from the GIS department.
 - a. IF requested information has new transmission switch locations,
THEN the VC VPM must ASSIGN the poles to the local VC Vendor to complete an Ad Hoc inspection, adding it to the nearest/surrounding One VM project.

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- b. The VC Vendor must WORK the Subject Pole accordingly.

4 Annual Work Cycles

- 4.1 Per annual planning, the VC Field Technician PERFORMS the required work at each designated location during each of the following annual cycles (SEE Table 1 below).

Regrowth and accumulation of debris (leaf litter, trash, etc.) is expected in the cleared Cylinder area after work is completed. The established work cycles are intended to address these materials.

Table 1. Annual Work Cycles

Annual Cycle Description	Required Work By VC Field Technicians
<p>Inspection/Initial Clearing (IC) Cycle</p> <p>PG&E's Inspection and IC cycles have been combined into one time frame, beginning in October, and running to the end of April.</p> <p>DOCUMENT in One VM any schedule adjustments for Projects experiencing extended Fall/Spring growth (green-up).</p>	<ul style="list-style-type: none"> • VC Field Technicians must INSPECT all primary voltage distribution poles/equipment within SRA, USFS-FRA, HFTD, and HFRA. • DOCUMENT ALL Subject Equipment, or lack thereof, in the VM platform via the "Inspect Pole" action. • Excluding constraints, VC Field Technicians must WORK all Subject Poles accordingly during this cycle.
<p>Maintenance Cycle</p> <p>Work is typically performed from May through September.</p>	<p>With exceptions around constrained locations and depending upon the clear type, VC Field Technicians must REVISIT all Subject Poles one or more times between the months of May through September. This work is split into two sub-cycles:</p> <ul style="list-style-type: none"> • M1 Sub-Cycle: Excluding locations that had a Work Status of "Inspect No Work" during the Inspection cycle, VC Field Technicians must WORK all documented Subject Poles during this Maintenance sub-cycle. Typically, this work is performed from May through July. • M2 Sub-Cycle: VC Field Technicians must WORK all Subject poles with a Clear Type of "Clear No Chem", and "Partial 1255" during this sub-cycle. Typically, this work is performed from August through September.

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Annual Cycle Description	Required Work By VC Field Technicians
<p>Ad-Hoc Work</p> <p>This out of cycle work addresses locations that may be brought to the attention of VC program management via a Tag or quality finding.</p> <p>NOTE: PG&E expects Contract Partners to have available workforce to complete both scheduled and ad-hoc work assignments.</p>	<p>The VC Technician will DOCUMENT work in One VM using the Ad-Hoc work flow.</p>

- 4.2 After receiving documented approval from a VC VPM, the VC Field Technician may GIVE a Work Status of Deferred to the work required at the Subject Pole during an Annual Work Cycle. A deferred work status will push the work to the next cycle.

5 Before Going Out into the Field

- 5.1 The VC Field Technician must:

1. SYNC their iOS device daily prior to going out into the field. This loads all the maps and SAs for their assigned work.
2. HAVE printed copies of all VC published documents readily available or have digital versions on their iOS devices so they can easily reference them as needed.
3. PUT their iOS device in Airplane mode while working the project in the field (if assigned work is in a known cell service dead zone).

6 Inspecting and Clearing Notes

- 6.1 Inspecting Notes

1. The VC Field Technician must:
 - a. ENSURE that **ALL Subject Poles** have a DOCUMENTED Fire Risk Assessment, per Job Aid TD-7112P-01-JA01, "Fire Risk Assessments."
 - b. INSPECT the poles on idle lines as if the lines were energized.
 - c. IF the pole has already had a documented inspection within One VM for that project year,

THEN the VC Field Technician must USE the Re-inspection Action as needed.

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- d. Correctly USE the **Middle of the Road Rule** when inspecting for Subject Poles.
 - (1) IF the Subject Pole does not geospatially fall within SRA, USFS-FRA, HFTD, or HFRA,

AND the Middle of the Road Rule is to be applied,

THEN CHECK the box within the Inspect Pole Action.

6.2 Clearing Notes

1. The VC Field Technician must:
 - a. UNDERSTAND that the clearing expectation is the removal or modification of vegetation and other flammable materials for the purpose of preventing the spread of fire via a Continuous Path of fuel leading outside the Cylinder.
 - b. NOT REMOVE any property owner installed Jute Netting (or any other material that PG&E's VASA department has approved) that has been installed for landscaping and erosion control purposes.
 - c. ENSURE that ground disturbing work is NOT performed.
 - (1) Specifically, DO NOT include moss, stumps, stubs, and/or exposed roots within the Scope of Work for clearance or removal.
 - d. For the purpose of this procedure and when SAFE and PRACTICAL, ENSURE that stumps remaining within the cleared Cylinder are NOT any higher above ground than 12" on the upper slope.
 - (1) Exceptions may be applied to large stumps if approved by the Regional VPM.
 - (2) DOCUMENT this exception in the system of record.
 - e. UNDERSTAND that mistletoe alone should NOT be listed as a reason for performing 1254(c) work.

Mistletoe has been found to have no effect on radial growth or survivorship on many California tree species.
 - f. UNDERSTAND that rhizomes (subterranean plant stems) do not have to be completely removed during clearing activities because ground disturbing work is prohibited.
2. Excluding 1254(c) work (SEE Table 2, "Inspection and Clearing Cycles" below),

IF a location requires work beyond the capabilities of a VC Field Technician,

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THEN the work must be completed by a Contract Partner or a Subcontract Partner tree crew (TC).

- a. In this case, the VC Field Technician must NOTIFY the Regional VPM via email. The content of the email must include an observation report and photos with the pole number in its subject line.
- b. Additionally, the VC Field Technician must ADD a comment to the pole record stating that an observation report was submitted for the required work.

7 Inspecting and Clearing Poles

7.1 To begin the required inspections, the VC Field Technician must:

1. USE the Lemur app within One VM to locate the pole to inspect.
2. Make a reasonable ATTEMPT to notify the property owner by knocking on the door or calling the listed phone number.
3. DETERMINE whether the pole is accessible.
4. IF the pole is accessible,
THEN APPROACH the pole.
 - a. Go to Step 6 below.
5. IF the pole is NOT accessible,
THEN ATTEMPT to coordinate with the property owner to obtain access.
 - a. IF the property owner interferes with access,
THEN INITIATE the interference process outlined in [Table 3, "Customer Interference Situations"](#) below.
 - b. IF the property owner does not interfere with access,
THEN go to step 6.
6. VISUALLY INSPECT the pole and DETERMINE whether the pole has subject equipment installed. Based on this determination and which SOW applies, SELECT the appropriate option in Table 2, "Inspection and Clearing Cycles," and PERFORM the steps in that option.

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Table 2. Inspection and Clearing Cycles

Inspection and Clearing Cycle Options	Notes and Steps to Perform
The pole does NOT have Subject Equipment.	<ol style="list-style-type: none"> 1. DOCUMENT (with Comments as needed) as a NON-SUBJECT pole inspection within the Inspect Pole Action in the One VM app. 2. PROCEED to next pole.
The pole NO LONGER has Subject Equipment.	<ol style="list-style-type: none"> 1. DOCUMENT (with Comments as needed) as a NON-SUBJECT pole inspection within the Inspect Pole Action in the One VM app and delist the Subject Equipment from the pole record. 2. PROCEED to next pole.
The pole has Subject Equipment, and the Clear Type is Full 1255 or Hardscape .	<ol style="list-style-type: none"> 1. DOCUMENT and UPDATE (with Comments, Customer info, and Alerts as needed) as a SUBJECT pole inspection. 2. FOLLOW along with the input flows of the Inspect Pole and Clear Pole Actions in the One VM app, and ENSURE that each different piece of Subject Equipment is listed in the pole record. 3. The pole does NOT require clearing. PROCEED to the next pole.
The pole has Subject Equipment, and the Clear Type is Partial 1255 .	<ol style="list-style-type: none"> 1. DOCUMENT and UPDATE (with Comments, Customer info, and Alerts as needed) as a SUBJECT pole inspection and clearing. 2. FOLLOW along with the input flows of the Inspect Pole and/or Clear Pole Actions in the One VM app, being sure to list each different piece of Subject Equipment in the pole record. 3. DOCUMENT in detail what plants and/or sections of the Cylinder are exempt from clearing and what actually must be cleared. 4. Mechanically CLEAR whatever portion requires clearing. 5. DOCUMENT that work was completed on the pole. 6. PROCEED to next pole.

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Inspection and Clearing Cycle Options	Notes and Steps to Perform
<p>The pole has Subject Equipment, and the Clear Type is Clear Only.</p>	<ol style="list-style-type: none"> 1. DOCUMENT and UPDATE (with Comments, Customer info, and Alerts as needed) as a SUBJECT pole inspection and clearing. 2. FOLLOW along with the input flows of the Inspect Pole and/or Clear Pole Actions in the One VM app, being sure to list each different piece of Subject Equipment in the pole record. 3. Mechanically CLEAR the pole. 4. DOCUMENT that work was completed on the pole. 5. PROCEED to next pole.
<p>The pole has Subject Equipment, and the Clear Type is Clear and Treat.</p>	<ol style="list-style-type: none"> 1. DOCUMENT and UPDATE (with Comments, Customer info, and Alerts as needed) as a SUBJECT pole inspection and clearing. 2. FOLLOW along with the input flows of the Inspect Pole and Clear Pole Actions in the One VM app, being sure to list each different piece of Subject Equipment in the pole record. 3. Mechanically CLEAR the pole. 4. APPLY herbicide (SEE Appendix A, "Herbicide Use"). 5. DOCUMENT that work was completed on the pole. 6. PROCEED to next pole.
<p>The pole has Subject Equipment and requires CCR § 1254(c) WORK that cannot be safely completed by a VC Field Technician.</p> <p>For the purposes of this Procedure, it is not PRACTICAL for the VC Field Technician to conduct work required under CCR 1254(c) if work cannot be safely completed with the tools or capabilities of that technician.</p>	<ol style="list-style-type: none"> 1. IF it is NOT SAFE and PRACTICAL to conduct the work required under CCR § 1254(c), THEN the VC Field Technician must FOLLOW the steps below: <ol style="list-style-type: none"> a. DOCUMENT the need for CCR § 1254(c) work within the Insect Pole Action via the appropriate check box. b. PHOTOGRAPH the dead and dying material in question AND provide the photos to their VPM. c. Mechanically CLEAR the pole, AND then GIVE the Clear Pole Action the work status of Complete, Pending 1254(c) so that a VPM may schedule the additional work as needed. d. PROCEED to next pole.

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Inspection and Clearing Cycle Options	Notes and Steps to Perform
<p>Risk Reduction Subject Pole ranked Low Risk AND/OR the only Subject Equipment is Split Bolts and/or Solid Blades.</p>	<ol style="list-style-type: none"> 1. DOCUMENT and UPDATE (with Comments, Customer info, and Alerts as needed) as a SUBJECT pole inspection. <ol style="list-style-type: none"> a. FOLLOW along with the input flows of the Inspect Pole and/or Clear Pole Actions in the One VM app, and ENSURE that each different piece of Subject Equipment is listed the pole record. b. IF the only Subject Equipment on the pole is Split Bolts AND/OR Solid Blades, OR the site is ranked Low Risk on the Fire Risk Assessment, THEN the VC Field Technician should LIST the work status as an Inspect No Work. No clearing work is required. 2. The pole does NOT require clearing. 3. PROCEED to next pole.

8 Interference and Constraints

8.1 If necessary, DETERMINE which situation applies and DOCUMENT the interference according to Table 3 below.

Table 3. Customer Interference Situations

Type of Customer Interference	Steps to Perform
<p>Access interference</p> <p>A situation where the property owner interferes with the VC Field Technicians attempt to inspect a pole.</p>	<ol style="list-style-type: none"> 1. IF the VC Field Technician cannot inspect a pole due to property owner INTERFERENCE (SEE Definition Section), THEN the VC Field Technician must SELECT the pole in the Lemur mapping part of One VM and CHOOSE Manage Constraints to document that the inspection has been interfered with. 2. In One VM, UPDATE the pole record accordingly: Inspect Pole Action: "Full Refusal"

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Type of Customer Interference	Steps to Perform
<p>Full Clearing Interference</p> <p>A situation where the property owner interferes with the VC Field Technicians attempt to clear anything at a pole subject to PG&E standards.</p>	<ol style="list-style-type: none"> IF the VC Field Technician cannot fully clear a Subject Pole to PG&E standards due to the property owner's complete interference, THEN the VC Field Technician must SELECT the pole in the Lemur mapping part of One VM and CHOOSE Manage Constraints to document that the clearing has been interfered with. In One VM, UPDATE the pole record accordingly: Clear Pole Action: "Full Refusal" <p>NOTE: IF there are multiple property owners involved in the full interference, they all must be documented accordingly within the One VM Constraint.</p>
<p>Partial Clearing Interference</p> <p>A situation where the property owner interferes with the VC Field Technicians attempt to fully clear a Subject Pole to PG&E standards but allows them to partially clear it. Or a situation where the clearing spans across multiple properties and one or more of the property owners are interfering with the VC Field Technician's ability to fully clear the Subject Pole to PG&E standards.</p>	<ol style="list-style-type: none"> IF the property owner only allows the VC Field Technician to partially clear a Subject Pole to PG&E standards, THEN clear all that the property owner allows. In One VM, UPDATE the pole record accordingly: Clear Pole Action: "Complete, Partial Refusal"

8.2 Timeline for Handling Interference

- IF a customer is interfering with work,

THEN the VC Field Technician must inform their GF within ONE business day.
- Within TWO business days of notification, the GF must **ATTEMPT** to contact the property owner.
- IF the property owner still interferes with the work,

OR IF the GF cannot contact the property owner,

THEN the GF must **NOTIFY** their Supervisor/Interference Specialist.

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4. Within THREE business days of the notification, the Supervisor/Interference Specialist must ATTEMPT to contact the property owner.
5. IF the property owner still intends to interfere with the work,
OR IF the Supervisor/Interference Specialist cannot contact the property owner,
THEN the VC VPM must ATTEMPT to resolve the interference.
 - a. The VC VPM must WORK with the PG&E Land Rights Services to check what rights exist.
 - b. IF sufficient land rights exist,
 - (1) THEN the VC VPM must MAKE phone contact with the customer/property owner within TEN days.
 - (2) IF contact cannot be made by phone,
THEN the VC VPM must PERFORM a site visit at the location to attempt contact in person within 20 days.

NOTE

The VPM must document ALL attempts to contact the property owner within the Constraints portion of the One VM record.

- (3) IF the VC VPM cannot resolve the interference within 30 days,
THEN they must REQUEST that the VC Clerk send an Interference Letter to the property owner.
- (4) IF contact and resolution still cannot be completed,
THEN the VC VPM must PERFORM these steps:
 - ATTEMPT to work with the Local Customer Experience (LCE) and Constraints Management (CM) teams for aid in resolution.
 - IF the LCE and CM teams are not able to help resolve the interference,
THEN WORK with the Corporate Security team for assistance with a **Forced Clear**.

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NOTE

Excluding locations where sufficient land rights do not exist, ALL interferences must be resolved within 90 days.

- c. IF sufficient land rights DO NOT exist,
THEN the VC VPM must PERFORM these steps:
 - (1) From the Back Office, DOCUMENT in the One VM pole record that clearing is not required per PRC § 4295 because sufficient land rights do not exist.

NOTE

For the purposes of the VC program, PRC § 4295 can be applied to both Compliance and Risk Reduction Subject Pole locations.

Optional additional steps (DISCUSS with VC VPM):

- (1) ATTEMPT to work with the Land Department (Acquisitions) to acquire the requisite land rights
- (2) OR ATTEMPT to work with the local Maintenance and Construction (M&C) team to change the Subject Equipment to Non-Subject Equipment, or possibly have it relocated.

8.3 Agency Constraints

- 1. IF the VC Field Technician encounters a Subject Pole where the Environmental Constraints Layer (ECL) shows the location to be within an Agency Managed Land that requires further review and/or planning prior to the pole being cleared,
THEN SELECT the pole in the Lemur mapping part of One VM AND CHOOSE Manage Constraints.
 - a. SELECT Agency Managed Lands in the Constraint Category.
 - b. SELECT the appropriate Agency in the Constraint Type (e.g., Caltrans)

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8.4 Environmental Review Constraints for New Subject Poles

1. IF the VC Field Technician encounters a newly found Subject Pole where the ECL deems an Environmental Release To Construction (ERTC) is required prior to the pole being cleared,
2. THEN SELECT the pole in the Lemur mapping part of One VM and CHOOSE Manage Constraints AND:
 - SELECT Environmental Review in the Constraint Category.
 - SELECT **ERTC/Permit Required** in the Constraint Type.

9 Erosion Control

Occasionally at Subject Pole locations with steep slopes, the clearing requirements lead to a soil erosion situation that warrants the attention of a VC VPM.

1. The VPM may ELECT to have an erosion control solution implemented, such as having crushed rock or slurry/cement (in extreme unsafe situations) spread throughout the Cylinder to prevent and/or reduce further damage.
2. IF the VC Field Technician and their GF both believe that an erosion control solution should be implemented,

THEN TAKE photos AND BRING the photos to the VC VPM with their case for erosion control.
3. Regardless of whether an erosion control solution is implemented, the VC Field Technician must CONTINUE to work the Subject Pole normally during future annual cycles.

10 Syncing Completed Work

10.1 At the end of each day, the VC Field Technician must SYNC their completed work to Salesforce:

1. Online Mode: Even though Salesforce automatically syncs all collected data throughout the day, the VC Field Technician should PERFORM these steps in the Salesforce app:
 - a. SELECT profile.
 - b. SELECT the gear symbol and OPEN the data sync option.
 - c. PRESS the data sync button.
2. Offline Mode: The VC Field Technician must RETURN to an area with good cell service (recommend at least 2 bars) AND TURN OFF Airplane mode on the iOS device before following the steps above.

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11 Work Audits

1. The Regional VPM must PRIORITIZE the mitigation of any internal PG&E Quality Control findings in the following manner:
 - a. Priority 1: Findings during the peak of declared Fire Season that must be mitigated within two business days from when the Regional VPM issues the finding to the Vendor. Examples include, but are not limited to missed poles, VC tech failed to clear pole at all, and/or large amounts of dead vegetation still present.
 - b. Priority 2: Poor workmanship findings that must be mitigated prior to the next VC routine work cycle, and includes all data corrections.
 - c. Priority 3: Findings during Winter Preparedness OR Change of Condition findings that were not a direct result of poor workmanship. These findings will be mitigated during the next VC routine work cycle.
 - d. Priority 4: Findings where No Work/Mitigation is required.
2. VC Contract Partners must PERFORM self-audits on their completed work on a regular basis per signed Specification 5380. When completing these audits, the auditor must:
 - a. CONSIDER the amount of time that has passed since the work was completed.

The audit is expected to take place within SEVEN days of the work being completed. The items expected to be audited (but not limited to) are listed below:

 - Subject Equipment and SOW correctly identified?
 - Fire Risk Assessment on a Risk Reduction SOW Subject Pole correctly documented (changes that are a result of pole requiring clearing)?
 - Subject Pole effectively cleared to CCR § 1254(a)?
 - Subject Pole effectively cleared to CCR § 1254(b)?
 - Is CCR § 1254(c) work needed and not listed within the One VM pole record?
 - b. CONSIDER whether or not any “debris” that may remain within the cleared Cylinder has the ability to spread fire outside of the cleared Cylinder if it were to ignite from within. In this case, the clearing would fail the audit.

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NOTE

Regrowth, new leaf litter, and other change in conditions will not result in failed audits.

END of Instructions

DEFINITIONS

CalFire Unit: The geographic area defined by CalFire during declared wildfire season whose jurisdiction may include more than one county.

Continuous Path: For the purposes of this procedure, this phrase provides clarity for language in CCR 1254(a) that states "...that will allow fire to spread." Fire is likely to spread outside of the Cylinder if there is a continuous path of fuel. Healthy lush green regrowth, sporadic newly dropped leaf litter or pinecones found between clearing cycles does not constitute a continuous path of fuel.

Cylinder (The): The conceptual space around Subject Poles, as depicted in Figure 1 of Utility Standard TD-7112S, "Vegetation Control Program" Per Title 14 CCR, § 1254:

The radius of the Cylinder is 10 feet (3.1 m), measured horizontally from the outer circumference of the pole or tower. Its height is measured from where the vertical exterior surface of the Cylinder connects to the ground to where it intersects with a horizontal plane passing through the highest point at which a conductor is attached to the pole or tower.

Flammable vegetation and materials wholly or partially within the Cylinder must be treated as follows:

- At ground level:
Remove flammable materials, including but not limited to, ground litter, duff and dead or desiccated vegetation that will allow fire to spread.
- From 0 - 8 feet (0-2.4 m) above ground level:
Remove flammable trash, debris or other materials, grass, herbaceous and brush vegetation.
Remove all limbs and foliage of living trees up to a height of 8 feet (2.4 m).
- From 8 feet (2.4 m) to the horizontal plane passing through the highest point of conductor attachment:
Remove dead, diseased or dying limbs and foliage from living sound trees
Remove any dead, diseased or dying trees in their entirety.

Firebreak: Per Title 14 CCR, § 1251, "firebreak" means a natural or artificial barrier usually created by the removal OR modification of vegetation and other flammable materials for the purpose of preventing the spread of fire.

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Full Exemption Location: A Subject Pole that meets one or more of the criteria listed in [Title 14 CCR § 1255](#).

Interference: A situation that occurs when a customer refuses to allow PG&E to perform inspection work or complete 100% of the work required to bring the site into compliance with PG&E Standards. A VC crew 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.

Middle-of-the-Road Rule: When a pole is between two responsibility areas where the boundaries of those areas are along roads, highways, streets, railroads, streams, canals or rivers, the actual boundary must be the centerline of the course.

Public Resources Code PRC § 4295: A person is not required by PRC § 4292 or 4293 to maintain any clearing on any land if such person does not have the legal right to maintain such clearing, nor do such sections require any person to enter upon or to damage property which is owned by any other person without the consent of the owner of the property.

Risk Reduction Work: All work outlined in this document that is not required by PRC 4292 and not located on USFS lands.

Subject Equipment: Refers to equipment targeted by the Utility Standard TD-7112S, "Vegetation Control Program".

- Equipment determined by CalFire that when operating under normal conditions can drop molten metal in the form of sparks. The equipment is located on a PG&E facility where PRC 4292 applies and/or in other areas assigned by PG&E. These facilities are also known as "subject poles". Refer to the [California Power Line Fire Prevention Field Guide](#) for details.
- Other equipment specifically identified or determined by PG&E for Risk Reduction Work.

Utility Fire Potential Index (FPI) Rating: A rating to determine the risk of fire and its likely behavior. Its calculation and scale from "R1" to "R5-Plus" considers fuel moisture, humidity, wind speed, air temperature, and historical fire occurrence.

IMPLEMENTATION RESPONSIBILITIES

The Vegetation Control document owner is responsible for the rollout and communication of this procedure, as well as the periodic review of this document.

Vegetation control operations is responsible for the distribution of this procedure by providing training and conducting regular reviews.

GOVERNING DOCUMENT

TD-7112S, "Vegetation Control Standard"

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COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

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 Resource Code § 4292](#)

[Title 14 California Code of Regulations § 1254](#)

[Title 14 California Code of Regulations § 1255](#)

[PG&E Wildfire Mitigation Plan](#)

[California Power Line Fire Prevention Field Guide](#)

REFERENCE DOCUMENTS

Developmental References:

NA

Supplemental References:

- [TD-7102P-09, "Reporting Abnormal Field Conditions for Vegetation Management"](#)
- [TD-7102P-04, "Distribution Vegetation Interference Procedure"](#)
- [TD-7102P-06, "Vegetation Management Distribution Inspection Mapping"](#)
- [Powerline Equipment Identification Pocket Guide](#)

APPENDICES

Appendix A, Herbicide Use

ATTACHMENTS

TD-7112P-01-JA01, "Fire Risk Assessment: Vegetation Control Pole Clearing"

TD-7112P-01-JA03, "Illustrated Subject Pole Clearing Requirements"

TD-7112P-01-JA05, "Subject Equipment: Vegetation Control Pole Clearing"

TD-7112P-01-JA06, "Handling Broken/Empty Liquid Fuses"

DOCUMENT REVISION

TD-7112P-01, "Vegetation Control Procedure", 09/19/2022, Rev.1

TD-7112P-01-JA02, "Pole Work Status Report Types," 11/19/2022, Rev. 0

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TD-7112P-01-JA04, "Subject Pole Number Tag Placement," 11/19/2022, Rev. 0

TD-7112P-01-Att01, "Handling Pole Clearing Refusals and Exceptions," 1/19/2022, Rev. 0

DOCUMENT APPROVER

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REVISION NOTES

Where?	What Changed?
Entire Document	<p>Updated the terminology "non-exempt" to "subject" equipment.</p> <p>Reorganized and updated sections and subsections (including title and subtitle changes).</p> <p>Reorganized and updated step procedures for clarity.</p> <p>Removed referenced to BMP and PCDH2 software/database references.</p> <p>Added references to Lemur Mapping/One VM.</p> <p>Remove Paper Map references.</p>
Section 4	Updated description of Maintenance Cycles.
Section 6	<p>Updated job descriptions for inspecting and clearing.</p> <p>Provided further explanation on VC Field Technicians correctly using the Middle of the Road Rule.</p>
Section 9	Updated constraint and interference processes.
Definitions Section	Updated and added definitions.

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Appendix A, Herbicide Use

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Herbicide Restrictions

Herbicides must be used in accordance with all Federal and State regulations. They cannot be used:

- Within 500 feet of a school and/or daycare facility
- Within 100 feet of a well head or perennial watercourse
- Below the high-water line on a seasonal watercourse
- Within 100 feet of an organic farm, vineyard, or orchard
- In a location where runoff into ponds, lakes, streams, canals, or other areas such as orchards where landscaping can be affected by migration of the herbicide
- Within FRAs
- When wind velocity consistently exceeds 10 mph
- When the temperature consistently exceeds 85 degrees Fahrenheit
- When there is steady rain fall
- When there is standing water around the pole or Cylinder

Before herbicides can be applied, consent must be obtained from the property owner. If more than one person owns the location, then consent must be obtained from each property owner.

Herbicide Safety, Spill Prevention, and Response Preparedness

A list of emergency medical facilities or local hospital locations with phone numbers for area of operation must be posted in vehicles and updated annually.

Employees must have copies of the herbicide SDS readily available in their vehicles and all containers/tanks/etc. must be physically labeled.

Apply and mix herbicides only in accordance with label restrictions.

Use all required PPE. Store all PPE in a separate area from pesticides. Standard PPE includes boots and socks, long-sleeved shirt, long pants, chemical-resistant gloves (rubber or neoprene), and safety glasses with brow and temple protection.

Spill kits are required on all vehicles transporting herbicides and must be periodically inspected.

Regular inspections of plumbing parts of tanks and backpack sprayers are necessary so that worn out parts can be replaced.