

# Vegetation Control Program

## 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. Clearances for regulatory compliance are prescriptive and targeted to specific equipment types. This utility standard describes the VC process standards for ensuring that PG&E is compliant with PRC § 4292 and additional WMP risk reduction commitments.

## TARGET AUDIENCE

Vegetation Asset Strategy and Analytics (VASA) personnel

VC Field Technicians

Vegetation Management (VM) operations, governance and support

VC VM Managers (VPMs), Supervisors, and Sr. Leadership

VC Contract Partners: Inspectors, Tree Crews (TCs), Quality Assurance (QA), Quality Control (QC), Quality Verification (QV), and Project Coordinators (PCs)

## TABLE OF CONTENTS

SUBSECTION	TITLE	PAGE
1	Regulatory Requirements and Commitments .....	2
2	Exceptions to Regulatory Requirements.....	5
3	Equipment to Which This Standard Applies.....	5
4	Where and When This Standard Applies.....	6
5	Industry Standards and Arboriculture Practices .....	6
6	Roles and Responsibilities .....	6
7	Annual Planning .....	8
8	Expectations for Distribution Poles for Compliance .....	8
9	Expectations for Distribution Poles for Risk Reduction Work.....	9
10	Expectations for Distribution Poles in USFS-FRAs.....	10
11	Expectations for Transmission Poles.....	10
12	Recordkeeping .....	10

## Vegetation Control Program

### REQUIREMENTS

#### 1 Regulatory Requirements and Commitments

##### 1.1 Public Resources Code (PRC) § 4292

1. PRC § 4292 applies in any mountainous land, forest-covered land, brush-covered land or grass-covered land during times and in such areas that are determined to be necessary by the director or the agency which has primary responsibility for fire protection of such areas, unless specifically exempted by California Code of Regulations (CCR) Title 14 § 1255.
2. PRC 4292 requires PG&E to maintain a minimum firebreak of a 10-foot radius around both distribution and transmission poles with nonexempt equipment.

##### 1.2 Title 14 CCR § 1252. Areas Where PRC §§ 4292- 4296 Apply in State Responsibility Areas.

1. The Director will apply PRC §§ 4292-4296 in any mountainous land, forest covered land, brush covered land or grass covered land within State Responsibility Areas unless specifically exempted by 14 CCR § 1255 and 14 CCR § 1257.

##### 1.3 Title 14 CCR § 1253. Time When PRC §§ 4292-4296 Apply in State Responsibility Areas.

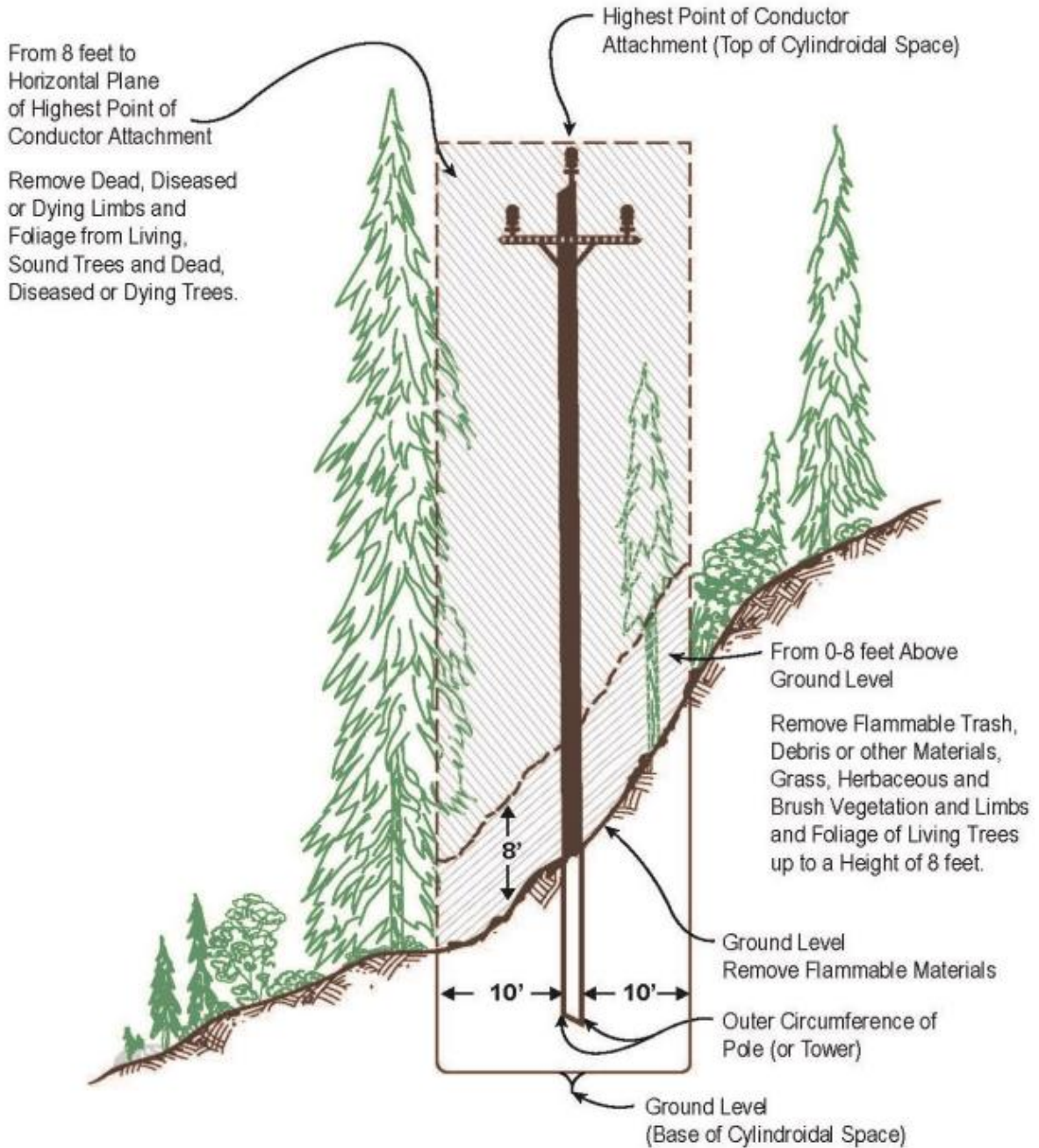
1. The minimum firebreak and clearance provisions of PRC § 4292 apply during the declared CalFire fire season for a respective CalFire Unit.

##### 1.4 Title 14 CCR, § 1254. Minimum Clearance Provisions in State Responsibility Areas - PRC § 4292.

1. Flammable vegetation and materials located wholly or partially within the firebreak space must be treated as follows (see Figure 1 below):
  - 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 - 2.4 m (0-8 feet) 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 2.4 m (8 feet).
  - From 2.4 m (8 feet) to a horizontal plane of 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.

## Vegetation Control Program

**Figure 1. 14 CCR § 1254 Fire Break Clearance Requirements Around Poles and Towers**



## Vegetation Control Program

- 1.5 Title 14 CCR, § 1255 Exemptions to Minimum Clearance Provisions - PRC § 4292
1. The minimum clearance provisions of PRC § 4292 are not required around poles and towers, including line junction, corner and dead end poles and towers:
    - (a) Where all conductors are continuous over or through a pole or tower; or
    - (b) Where all conductors are not continuous over or through a pole or tower, provided, all conductors and subordinate equipment are of the types listed below and are properly installed and used for the purpose for which they were designed and manufactured:
      - (1) compression connectors,
      - (2) automatic connectors,
      - (3) parallel groove connectors,
      - (4) hot line tap or clamp connectors that were designed to absorb any expansion or contraction by applying spring tension on the main line or running conductor and tap connector,
      - (5) Fargo GA 300 series piercing connectors designed and manufactured for use with tree wire,
      - (6) flat plate connectors installed with not less than two bolts,
      - (7) tapered c-shaped member and wedge connectors,
      - (8) solid blade single phase bypass switches and solid blade single phase disconnect switches associated with circuit reclosers, sectionalizers, and line regulators,
      - (9) equipment that is completely sealed and liquid-filled,
      - (10) current limiting non-expulsion fuses; or
    - (c) On the following areas if fire will not propagate thereon:
      - (1) fields planted to row crops,
      - (2) plowed or cultivated fields,
      - (3) producing vineyards that are plowed or cultivated,
      - (4) fields in nonflammable summer fallow,
      - (5) irrigated pasture land,
      - (6) orchards of fruit, nut or citrus trees that are plowed or cultivated,
      - (7) Christmas tree farms that are plowed or cultivated; and
      - (8) swamp, marsh or bog land; or
    - (d) where vegetation is maintained less than 12 inches in height, is fire resistant, and is planted and maintained for the specific purpose of preventing soil erosion and fire ignition.

## Vegetation Control Program

### 2 Exceptions to Regulatory Requirements

2.1 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:

- Permission-Based Exceptions
- Customer Interference
- Agency Constraints
- Environmental Constraints

### 3 Equipment to Which This Standard Applies

3.1 PG&E relies upon the clarifications and exemptions to PRC § 4292 provided in Title 14 CCR § 1255 as foundational guidance to determine which equipment configurations require firebreak maintenance. As such, PG&E applies firebreak clearances to the following equipment in State Responsibility Areas (SRAs) and United State Forest Service Federal Responsibility Areas (USFS-FRAs) lands:

- Equipment at Distribution Voltages
  - Universal fuses
  - Open link fuses
  - Solid blade and in-line disconnects, if not specifically PRC exempt in 14 CCR § 1255
  - Lightning/surge arresters, if not specifically exempt from PRC § 4292 per CalFire exemption letter
  - Hot Tap Clamps and Split Bolt connectors (Primary Distribution Voltage) if not specifically exempt in 14 CCR § 1255
  - Grasshopper air switches
  - Any new equipment types pending CalFire testing for exemption, or as directed by PG&E Standards
- Equipment at Transmission Voltages
  - All transmission switches

## Vegetation Control Program

### 3.2 Additional firebreak maintenance commitments for risk reduction.

- As committed to in the WMP, additional poles are included in the inventory, based on PG&E guidance (e.g., Risk Reduction Work).
- These locations may be added to reduce risk, improve access to equipment, allow for safe Supervisory Control and Data Acquisition (SCADA) operations, enhance public safety, complement other mitigations, and protect assets from wildfires regardless of cause at equipment locations, in addition to equipment defined in Section 1.4 above.

## 4 Where and When This Standard Applies

### 4.1 PG&E continuously applies this standard throughout the year in:

- State Responsibility Areas (SRAs).
- United States Forest Service Federal Responsibility Areas (USFS-FRAs).

### 4.2 In the absence of agreements with entities or agencies outside of SRAs and USFS-FRAs, or awareness that an area of other jurisdiction has adopted PRC § 4292, PG&E does apply PRC § 4292 to additional areas consistent with industry practice and as set forth in the California Power Line Fire Prevention Field Guide. Specifically, PG&E has adopted (with exceptions) PRC § 4292 clearing requirements in High Fire-Threat Districts (HFTDs) and High Fire Risk Areas (HFRA). These additional areas include but are not limited to Local Responsibility Areas (LRAs) within HFTDs, HFRA, and other non-USFS Federal Responsibility Areas.

For examples of exceptions, refer to Section 9, “Expectations for Distribution Poles for Risk Reduction Work” below.

### 4.3 PG&E may choose to apply this standard to poles in other locations.

## 5 Industry Standards and Arboriculture Practices

### 5.1 Where safe and practical, work must be prescribed, and tree cuts must be made in accordance with ANSI A300 Clause 13, “Tree Risk Assessment.”

## 6 Roles and Responsibilities

### 6.1 The VASA team is responsible for planning and developing strategic guidance on risk reduction objectives that the VC team will execute.



## Vegetation Control Program

- 6.2 The VC team is responsible for executing day-to-day operational tasks to meet the expectations in this standard. The following roles are responsible for the execution of those tasks:
1. VC field technicians are responsible for:
    - Inspecting subject equipment on overhead PG&E facilities within assigned jurisdictions
    - Establishing and maintaining fire breaks for subject equipment identified during inspection or otherwise assigned to VC for clearing in accordance with this standard
    - Recording facility status in the system of record
  2. VPM Supervisors are responsible for:
    - Supervising regional VPMs to ensure production and quality goals are safely obtained
  3. VPMs are responsible for:
    - Managing VC Contract Partner staff for their assigned region
    - Contacting customers who interfere in a manner that may result in non-compliance
  4. Contract Foresters are responsible for:
    - Acting as subject matter experts that aids in system reporting and project oversight
    - Filling in for VPMs as needed
  5. General Foremen are responsible for:
    - Supervising VC technicians to ensure production and quality goals are safely obtained
    - Assigning work requests to VC technicians
    - Coordinating work with landowners/controllers
    - Supporting initial steps to resolve or document customer interferences
  6. QC Auditors are responsible for:
    - Performing post work field audits. (QC Auditors are senior level VC technicians.)

## Vegetation Control Program

7. Database Management Specialists (DMSs) are responsible for:
  - Generating work requests and updating the system of record accordingly from the back office.

### 7 Annual Planning

- 7.1 Per the annual plan, pole clearing Contract Partners must perform work at each designated location to ensure compliance with PRC § 4292 and PG&E standards during the three annual cycles.
  - Inspection/Initial Clear: Oct – April
  - Maintenance 1 (M1 Sub-cycle) Except for “Inspect No Work” locations, all documented subject poles are targeted for clearance: May – July
  - Maintenance 2 (M2 Sub-cycle) Manually cleared pole population where herbicides could not be applied or permissible to apply are targeted for clearance: Aug – Sept

### 8 Expectations for Distribution Poles for Compliance

- 8.1 During the Inspection cycle, every primary voltage (greater than 750 volts) pole/structure within the assigned line sections are inspected.
- 8.2 Before entering the property of a customer, customer contact is attempted.
- 8.3 All unsafe situations and/or abnormal field conditions are reported.
- 8.4 All subject equipment that exists on poles is verified.
- 8.5 The accuracy of all pole inventory and records is ensured.
- 8.6 The accuracy of all pole number tags is ensured.
- 8.7 The accuracy of all inventoried equipment is ensured.
- 8.8 The completion of all environmental and cultural screening is ensured before proceeding with work.
- 8.9 When possible or if necessary, ensure that the property owner or agency is notified of work being performed.
- 8.10 If the property owner interferes with work required to bring the site into PRC § 4292 compliance, either verbally or in writing, then the interference process is initiated.
- 8.11 If the property owners only allow PG&E to partially clear to standards, then the record remains in interference status with a Clear Type of Clear No Chem and comments are added describing the approved work.



## Vegetation Control Program

- 8.12 If the property owner(s) grant permission to apply herbicides, then the site of the subject pole is annually chemically treated.
- 8.13 If site conforms with allowable herbicide Safety Data Sheet conditions and the property owner(s) does not grant permission to apply herbicides, then the subject pole is manually cleared.
- 8.14 Fire risk is assessed.
- 8.15 If a location requires work beyond the capabilities of a VC field technician, such as work outlined in 14 CCR § 1254(c), then an approved contract partner must complete the work.
- 8.16 Any required attribute changes or updates are noted in the VC pole record.
- 8.17 Sync the completed work with the system of record at the end of each workday.

### **9 Expectations for Distribution Poles for Risk Reduction Work**

- 9.1 The VC program inspects all primary voltage poles within assigned areas and assigns work as directed or necessary.

PG&E has adopted (with exceptions) PRC § 4292 clearing requirements in HFTDs and HFRAs. See Section 4, "Where and When This Standard Applies" above.

- 9.2 When exempt poles are included in the inventory based on WMP directives:
  - 1. The locations are assigned through written request or supporting internal decision documentation.
  - 2. The locations are defined and recorded during inspection.
  - 3. Risk Reduction Work poles are worked the same as compliance subject poles with the following exceptions:
    - The VC program will not conduct 1254(c) removals of dead, diseased or dying limbs or foliage from living sound trees for Risk Reduction Work poles. However, the VC program will conduct 1254(c) removals of dead trees in their entirety.
    - Subject poles where the only subject equipment installed are solid blades and/or split bolts do not require clearing activities. Poles will be inventoried and monitored for changes in equipment installed.
    - Subject poles with any type of subject equipment installed but have been ranked low risk on PG&E's fire risk matrix assessment do not require clearing activities. Poles will be inventoried and monitored for changes in risk.
    - All exceptions are documented accordingly.

## Vegetation Control Program

### 10 Expectations for Distribution Poles in USFS-FRAs

10.1 VC field technicians must work USFS-FRAs like SRAs, but with the following exceptions:

- PG&E does not apply herbicides within USFS-FRAs.
- Poles located outside the USFS portions of Federal Responsibility Areas may be included within the scope of Risk Reduction Work (see Section 9, “Expectations for Distribution Poles for Risk Reduction Work” above).

### 11 Expectations for Transmission Poles

11.1 VC patrols transmission facilities with distribution underbuilt facilities.

1. Standalone transmission lines are not patrolled.

11.2 VC clears transmission poles with switches and treats them as compliance work throughout SRAs, USFS-FRAs, and other areas assigned by PG&E.

11.3 Inventoried transmission subject poles are typically addressed in coordination with the nearest distribution project work schedule.

11.4 A monthly inventory true-up is performed to add or remove transmission switch locations.

### 12 Recordkeeping

12.1 Inspection/work findings must be recorded in the current system of record.

12.2 Customer interferences must be recorded in the current system of record.

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

- Permission-Based Exceptions
- Customer Interference
- Agency Constraints
- Environmental Constraints

**END of Requirements**

## Vegetation Control Program

### DEFINITIONS

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

**Cylinder (The):** The conceptual space around both distribution and transmission poles with nonexempt equipment as depicted in Figure 1 of this Standard. It is composed of a 10-foot radius around each pole and rises 8 feet above ground. 14 CCR § 1254 requires PG&E to remove flammable material from within this cylinder. Flammable material includes (but is not limited to) ground litter, duff and dead or desiccated vegetation that will allow fire to spread, flammable trash, debris or other materials, grass, herbaceous and brush vegetation, and all limbs and foliage of living trees. From 8 feet to conductor height, 14 CCR § 1254 requires PG&E to remove dead, diseased, or dying limbs and foliage from within the 10-foot radius.

**Full Exemption Location:** A subject pole that meets one or more of the criteria listed in 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.

**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 standard.

- 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.

### IMPLEMENTATION RESPONSIBILITIES

The vegetation control document owner is responsible for the rollout and communication of this standard, as well as the periodic review of this document.

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

## Vegetation Control Program

### GOVERNING DOCUMENT

[Utility Policy TD-05, "Vegetation Management"](#)

### 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](mailto: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

### REFERENCE DOCUMENTS

#### Developmental References:

- [California Public Resource Code § 4292 – In State Responsibility Areas and as adopted in Federal Responsibility Areas](#)
- [Title 14 California Code of Regulations § 1252 – Locations where PRC § 4292 Applies](#)
- [Title 14 California Code of Regulations § 1253 – Time when PRC 4292 Applies](#)
- [Title 14 California Code of Regulations § 1254 – Minimum Clearance Provisions of PRC 4292](#)
- [Title 14 California Code of Regulations § 1255 – Exemptions to Minimum Clearance Provisions of PRC 4292](#)
- [Public Utilities Code § 8386 – Annually submitted Wildfire Mitigation Plan](#)
- [2021 California Power Line Fire Prevention Field Guide](#)

#### Supplemental References:

NA

### APPENDICES

NA

## Vegetation Control Program

### ATTACHMENTS

NA

### DOCUMENT REVISION

TD-7112S, "Vegetation Control Program," 12/12/2022, Rev. 1

### DOCUMENT APPROVER

██████████, Sr. Manager, Vegetation Asset Strategy and Analytics

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### REVISION NOTES

Where?	What Changed?
Entire Document	Reorganized and updated sections and subsections (including title and subtitle changes).
Section 5	Added new section: Industry Standards and Arboriculture Practices
Section 7.1	Updated Annual Planning verbiage and added Maintenance Sub-cycles.
Section 9	Under 9.3 Risk Reduction Work Poles: Added bullet that no 1254(c) clearing is required, excluding entire dead tree removals from the cylinder. Added bullets about poles being inventoried and monitored for changes.
Definitions	Revised Cylinder definition. Changed definition of Risk Reduction Work to match the definition in TD-7112P-01, "Vegetation Control Procedure." Removed Subject Pole/Structure/Tower definition. Added Subject Equipment definition.
Attachment	Attachment deleted.