

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 in compliance with PRC 4292.

TARGET AUDIENCE

- Vegetation Asset Strategy and Analytics (VASA) personnel
- VC field technicians
- Vegetation Management (VM) operations, governance and support
- VC vegetation program managers (VPMs), supervisors, and sr. leadership
- VC contractors: inspectors, tree contractors (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	3
3	Where and When this Standard Applies.....	4
4	Roles and Responsibilities.....	4
5	Annual Planning.....	5
6	Expectations for Distribution Poles in SRAs.....	6
7	Expectations for Distribution Poles in LRAs	7
8	Expectations for Distribution Poles in FRAs	8
9	Expectations for Transmission Poles.....	8
10	Recordkeeping.....	8

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 within SRAs and FRAs, unless specifically exempted by [14 CCR, section 1255](#).
2. The minimum firebreak and clearance provisions of PRC 4292 apply during the declared CalFire fire season for a respective CalFire Unit.
3. PRC 4292 requires PG&E to maintain a minimum firebreak of a 10-foot radius around both distribution and transmission poles with nonexempt equipment.
 - a. Tree limbs within the 10-foot radius of the pole must be removed up to 8 feet above ground.
 - b. The area from 8 feet to conductor height requires removal of dead, diseased, or dying limbs and foliage.
 - c. This area is called “the cylinder.”
4. The firebreak clearances that PRC 4292 requires apply to the following equipment:

Non-Exempt Equipment at Distribution Voltages

- Universal fuses
- Open link fuses
- Solid blade and in-line disconnects, if not specifically 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

Non-Exempt Equipment at Transmission Voltages

- All transmission switches in SRAs or FRAs.

Vegetation Control Program

1.2 Title 14 CCR, Section 1254 Requirements

1. Flammable vegetation and materials located wholly or partially within the firebreak space 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 - 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 and any dead, diseased, or dying trees in their entirety.

1.3 Additional firebreak maintenance commitments for risk reduction.

1. As committed to in the WMP, additional poles are included in the inventory, based on PG&E guidance (e.g., risk reduction work) or through local agreements known and assigned by VC program management.

The locations are intended to reduce risk, improve access to equipment, allow for safe SCADA operations, enhance public safety, compliment other mitigations, and protect assets from wildfires regardless of cause at equipment locations, in addition to equipment defined in 1.1.4 above.

2 Exceptions to Regulatory Requirements

1. All exceptions must be accordingly documented 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

Vegetation Control Program

3 Where and When this Standard Applies

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

- State Responsibility Areas (SRAs).
- Federal Responsibility Areas (FRAs).
- The state does not mandate PG&E to clear poles within an LRA, but PG&E has adopted (with exceptions) PRC 4292 clearing requirements within LRA HFTD as well as High Fire Risk Area (HFRA).

For examples of exceptions, refer to section 7.4.

3.2 PG&E may choose to apply this procedure to poles in other locations.

4 Roles and Responsibilities

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

4.1 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:

- The primary responsibilities of VC field technicians are to:
 - Inspect non-exempt PG&E facilities.
 - Clear non-exempt PG&E facilities.
 - Record facility status in the system of record.
- The primary responsibilities of SVPMs are to:
 - Supervise regional VPMs to assure production and quality goals are safely obtained.
- The primary responsibilities of VPMs are to:
 - Manage VC Contractor staff for their assigned region.
 - Contact refusal customers to resolve non-compliances.

Vegetation Control Program

4.1 (continued)

- The primary responsibilities of Contract Foresters are to:
 - Act as subject matter experts that aid in system reporting and project oversight.
 - Fill in for VPMs as needed.
- The primary responsibilities of General Foreman are to:
 - Supervise VC technicians to assure production and quality goals are safely obtained.
 - Assign work requests to VC technicians.
 - Coordinate work with Landowners/controllers.
 - Support initial steps to resolve or document customer refusals.
- The primary responsibilities of QC Auditor are to:
 - Perform post work field audits. (QC Auditors are senior level VC technicians.)
- The primary responsibilities of DMS are to:
 - Generate work requests and edit system of record accordingly from the back office.
 - Create ITS records for tracking refusals.

5 Annual Planning

- 5.1 Per the annual plan, pole clearing contractors must perform work at each designated location to ensure compliance with PRC 4292 and PG&E standards during the three annual cycles.
- Pre-Inspection/Initial Clear and Treat: Oct – April
 - Maintenance: May – July
 - Re-Clear: Aug – Sept

Vegetation Control Program

6 Expectations for Distribution Poles in SRAs

1. During the PI cycle, every pole/structure within the assigned line sections is inspected.
2. Before entering the property of a customer, customer contact is attempted.
3. All unsafe situations and/or abnormal field conditions are reported.
4. All equipment that exists on currently inventoried poles is verified.
5. The accuracy of all pole inventory and records is ensured.
6. The accuracy of all pole number tags is ensured.
7. The accuracy of all inventoried equipment is ensured.
8. The taking and recording in the pole record of GPS coordinates is ensured.
9. The completion of all environmental and cultural screening is ensured before proceeding with work.
10. The property owner or agency is notified of work to be performed.
11. IF the property owner refuses any work required to bring the site into PRC 4292 compliance, either verbally or in writing,

THEN the refusal process is initiated.
12. If the property owners only allow PG&E to clear the site to 1254(a) standards,

THEN the record remains in refusal status with a Clear Type of Clear No Chem and comments are added describing the approved work.
13. Fire risk is assessed
14. All environmental/cultural [Best Management Practices](#) (BMPs), BMP sub-categories, and/or avoidance minimization measures (AMMs) are adhered to.
15. IF the property owner(s) grant permission to apply herbicides,

THEN the site of the subject pole is annually chemically treated.
16. IF the property owner(s) does not grant permission to apply herbicides,

THEN the subject pole is manually cleared.

Vegetation Control Program

Section 6 (continued)

17. IF a location requires work beyond the capabilities of a VC field technician, such as work outlined in 14 CCR, Section 1254(c),

THEN an approved-vendor line clearance-certified tree crew or an approved-vendor subcontracted line clearance-certified tree crew completes the work.

The line clearance-certified tree crew must be a prime contractor. The prime contractor must be fully responsible for compliance with all sections of 1254.
18. Any required attribute changes or updates are noted in the VC pole record.
19. Any changes to the circuit map are updated to reflect field conditions.
20. The completed work uploaded into the system of record at the end of each workday.

7 Expectations for Distribution Poles in LRAs

1. The VC program inspects all poles within assigned Risk Reduction areas and assigns work as necessary.

These areas are outside SRA/FRA jurisdictions but part of HFTD, HFRA or incorporated through specific guidance from Standards or local agreement.
2. Electronic records for these poles have a prefix of “L” in front of the pole number.
3. When exempt poles are included in the inventory based on WMP directives:
 - a. The locations are assigned through written request.
 - b. The locations are defined and recorded during inspection.
4. Poles in LRAs are worked the same as poles within SRAs, with the following exceptions.
 - Poles where the only equipment installed are solid blades and/or split bolts are considered low risk.
 - Poles with any other type of equipment installed but have been ranked low risk on PG&E’s fire risk matrix assessment.
 - All exceptions are documented accordingly.

Vegetation Control Program

8 Expectations for Distribution Poles in FRAs

1. VC field technicians must work FRAs like SRAs, but with the following exceptions.
 - PG&E does not apply herbicides within FRAs.
 - PG&E is only required to work the United States Forest Service (USFS) portions of FRAs like SRAs (see section 8.3).
 - Poles located outside the USFS portion of FRAs are treated like LRA locations and are therefore considered risk reduction work where exceptions apply (see section 8).

9 Expectations for Transmission Poles

1. VC patrols transmission facilities with distribution underbuild facilities: standalone transmission lines are not patrolled.
2. VC clears transmission poles with switches and treats them the same throughout SRAs, FRAs, and Risk Reduction Areas.
3. Inventoried transmission subject poles are typically addressed in coordination with the nearest distribution circuit work schedule.
4. A monthly inventory true-up is performed to add or remove transmission switch locations.

10 Recordkeeping

- 10.1 Inspection/work findings must be recorded in the current system of record.
- 10.2 Records for transmission-only poles/structures must have "T" as prefix to the electronic pole number.
- 10.3 Records for poles in Risk Reduction must have "L" as prefix to the pole number.

This indicates it is a Risk Reduction (PG&E standard)-driven subject pole and not a compliance (legal obligation)-driven subject pole.
- 10.4 Refusals must be recorded in the current system of record.

Vegetation Control Program

- 10.5 All exceptions must be accordingly documented 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
- 10.6 Annual field maps must be filled out and archived per [ERIM standards](#).

END of Requirements

Vegetation Control Program

DEFINITIONS

Cylinder (The): The conceptual space around both distribution and transmission poles with nonexempt equipment. It is composed of a 10-foot radius around each pole and rises 8 feet above ground. PRC 4292 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, PRC 4292 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.

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.

Nonexempt Equipment: Equipment located on PG&E facilities in SRA or USFS FRA that are not exempt from the clearing requirements of PRC 4292. Also known as “subject poles”.

Prime Contractor: The contractor that submitted a competitive proposal and was awarded the work.

Risk Reduction Work: Work completed in an LRA.

Subject Pole/Structure/Tower: A wood or metal pole or tower that has nonexempt equipment installed and for that reason is subject to PRC 4292 and/or PG&E clearing standards.

Refusal: 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 site into PRC 4292 compliance.

- A VC crew member should never imply or assume a refusal due to lack of contact such as a locked gate or multiple door tags left with no reply.

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.

GOVERNING DOCUMENT

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

Vegetation Control Program

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

Records and Information Management:

PG&E records are company assets that must be managed with integrity to ensure authenticity and reliability. Each Line of Business (LOB) must manage Records and Information in accordance with the Enterprise Records and Information (ERIM) Policy, Standards and Enterprise Records Retention Schedule (ERRS). Each Line of Business (LOB) is also responsible for ensuring records are complete, accurate, verifiable and can be retrieved upon request. Refer to [GOV-7101S, "Enterprise Records and Information Management Standard"](#) for further records management guidance or contact ERIM at Enterprise_RIM@pge.com.

- PRC 4292
- 14 CCR Section 1254
- 14 CCR Section 1255
- Wildfire Mitigation Plan

REFERENCE DOCUMENTS

Developmental References:

- [California Public Resource Code \(PRC\) 4292 – In State Responsibility Areas and as adopted in Federal Responsibility Areas](#)
- [Title 14 California Code of Regulations \(CCR\) 1252 – Locations where PRC 4292 Applies](#)
- [Title 14 California Code of Regulations \(CCR\) 1253 – Time when PRC 4292 Applies](#)
- [Title 14 California Code of Regulations \(CCR\) 1254 – Minimum Clearance Provisions of PRC 4292](#)
- [Title 14 California Code of Regulations \(CCR\) 1255 – Exemptions to Minimum Clearance Provisions of PRC 4292](#)
- [Public Utilities Code \(PUC\) 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

NA

DOCUMENT APPROVER

[REDACTED] Sr. Manager, Vegetation Asset Strategy and Analytics

DOCUMENT OWNER

[REDACTED] Manager, Vegetation Management

DOCUMENT CONTACT

[REDACTED] Principal Asset Management Specialist, Vegetation Asset Strategy and Analytics

[REDACTED] Principal Asset Management Specialist, Vegetation Asset Strategy and Analytics

REVISION NOTES

Where?	What Changed?
Entire Document	New document.
Section 6.	Added the word "number" to "The accuracy of all pole number tags is ensured."
Original section 6.19	Removed