

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans
Rulemaking 18-10-007
Data Response**

PG&E Data Request No.:	CalAdvocates_041-Q12		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_041-Q12Supp03		
Request Date:	February 19, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-07
Date Sent:	March 1, 2021 Supp01: March 17, 2021 Supp02: March 26, 2021 Supp03: April 12, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

SUBJECT: NON-SPATIAL DATA TABLES

The following questions relate to the attachment “Attachment 1 - All Data Tables Required by 2021 WMP Guidelines.xlsx.” For the purposes of these questions, the term “high-priority findings” refers to the combined number of Level 1 and Level 2 findings.

QUESTION 12

Per Table 5, PG&E reported 25 OSHA-reportable injuries due to vegetation management in 2019, and 47 in 2020.

- a. What were the top five contributing factors to injuries due to vegetation management in 2019? Please include the percentages attributed to those factors, if available.
- b. What were the top five contributing factors to injuries due to vegetation management in 2020? Please include the percentages attributed to those factors, if available.
- c. What measures has PG&E implemented to reduce the number of injuries occurring during vegetation management work?

ANSWER 12 SUPPLEMENTAL 03

PG&E submitted data for OSHA-*recordable* injuries to employees, contractors, and members of the public due to wildfire mitigation initiatives as part of Table 6 of our 2020 Wildfire Mitigation Plan (WMP) and Table 5 of our 2021 WMP. On pages 32-33 of the Comments of the Public Advocates Office on the 2021 Wildfire Mitigation Plan Update of Pacific Gas and Electric Company, Cal Advocates noted that PG&E’s use of OSHA-*recordable* data in Table 5 makes it difficult to conduct a meaningful comparison across utilities regarding worker safety. Accordingly, in order to align with the WSD, as well as

the other utilities, we have re-reviewed our records regarding injuries to employees, contractors, and members of the public to determine which injuries may be more specifically classified as OSHA-*reportable* injuries due to wildfire mitigation initiatives from 2018-2020, and we have amended Table 5 accordingly. PG&E is not responsible for reporting injuries to contractors and members of the public to OSHA. Therefore, the figures in the revised Table 5 for injuries to contractors and members of the public are based on PG&E's best available data for injuries that, given their severity, would have likely been reported to OSHA by PG&E had the injuries occurred to a PG&E employee.

Please see attachment 'WildfireMitigationPlans_DR_CalAdvocates_041-Q12Supp03Atch01' for updated Table 5.

ANSWER 12 SUPPLEMENTAL 02

- a. PG&E has reviewed the data included in Table 5 of Attachment 1 to the 2021 Wildfire Mitigation Plan (WMP) update and determined that the data requires correction. Upon further review of the data in response to this request, PG&E has determined that there were 68 OSHA-recordable contractor injuries due to VM work in 2019. As stated previously, PG&E did not track OSHA-recordable contractor injuries prior to the end of 2019 and early 2020. The 68 OSHA-recordable contractor injuries identified here represent the injuries self-reported by VM contractors through the ISNetworld Database for the year 2019. As referenced in our errata to the 2021 WMP, PG&E hereby updates Table 5 of the 2021 WMP to reflect this change. A copy of the updated Table 5 is attached hereto as WildfireMitigationPlans_DR_CalAdvocates_041-Q12Supp02Atch01.

PG&E cannot identify the top contributing factors to the 68 OSHA-recordable contractor injuries due to VM work in 2019 because that information was not tracked in the ISNetworld Database.

ANSWER 12 SUPPLEMENTAL 01

- a. PG&E does not have information for the contributing factors to OSHA-recordable contractor injuries due to vegetation management work in 2019. Record keeping related to OSHA-recordable incidents has typically been the responsibility of our contract vendors. PG&E started keeping a record of VM contract work OSHA-recordable incidents at the end of 2019 and in early 2020.
- b. After further evaluation in response to this request, PG&E has discovered that the total OSHA-recordable contractor injuries due to vegetation management activities in 2020 is 72 rather than 47, as indicated in Table 5 of the 2021 WMP. The need for this update will be more fully described in the errata filed by PG&E to the 2021 WMP. In addition, PG&E has discovered that the causes of the OSHA-recordable contractor injuries due to vegetation management in 2020 have been documented in our system of record. Please see WildfireMitigationPlans_DR_CalAdvocates_051-Q02Atch01.xlsx in response to CalPA 51, Question 2 for a complete list of the OSHA-recordable contractor

injuries associated with vegetation management work in 2020 and the causes of those injuries.

ANSWER 12

- a. PG&E does not have information for the top five contributing factors to injuries due to vegetation management in 2019. Record keeping related to OSHA-reportable incidents has typically been the responsibility of our contract vendors. PG&E started keeping a record of VM contract work OSHA-reportable incidents at the end of 2019 and in early 2020. However, PG&E's record keeping tracks the types incident injuries rather than potential contributing factors to the injuries.
- b. PG&E does not have information for the top five contributing factors to injuries due to vegetation management in 2020. Record keeping related to OSHA-reportable incidents has typically been the responsibility of our contract vendors. PG&E started keeping a record of VM contract work OSHA-reportable incidents at the end of 2019 and in early 2020. However, PG&E's record keeping tracks the types of incident injuries rather than potential contributing factors to the injuries.
- c. To reduce the number of injuries occurring during VM work, PG&E has implemented additional prime vendor controls. It is now a requirement for each prime tree crew vendor to go through a detailed process prior to contractors performing work on PG&E premises. The process includes an interview with VM leadership, vendors providing documentation related to contractor trainings and assessments, and a detailed review of the vendors' safety oversight plans. Additionally, PG&E has implemented new controls related to the amount of tree work a crew can perform during wildfire response. Newly implemented controls include, but are not limited to, providing additional PPE for our pre-inspectors, requiring vendors to have safety observers for their crews prior to starting work, and limiting the number of hours an employee can work.