

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023
Data Response

PG&E Data Request No.:	CalAdvocates_008-Q001		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_008-Q001		
Request Date:	March 30, 2023	Requester DR No.:	CalAdvocates-PGE-2023WMP-08
Date Sent:	April 5, 2023	Requesting Party:	Public Advocates Office
DRU Index #:		Requester:	Holly Wehrman

SUBJECT: 2023-2025 WMP SUBMISSION

QUESTION 001

PG&E's WMP states:

The EVM Program concluded at the end of 2022. PG&E will continue to strengthen our other existing VM programs. PG&E is transitioning the maintenance of enhanced clearances that were achieved in EVM to Routine VM patrols. We established routine maintenance requirements for electric distribution circuits where EVM scope clearances have been performed (in HFTD designated areas) and passed by work verification.⁴

- a) Please describe how PG&E intends to strengthen its other existing VM programs as stated above.
- b) Does PG&E intend to achieve 'enhanced clearances' in areas where they have not already been achieved through EVM, or is PG&E only intending to maintain existing enhanced clearances?
- c) If PG&E will pursue the achievement of enhanced clearances in new locations, please provide PG&E's strategy and methodology for the following:
 - i. Deciding which circuits and/or locations need enhanced clearances
 - ii. Deciding which trees to trim in a given project location
 - iii. Deciding the desired clearance distances
 - iv. Setting the schedule and sequence of enhanced clearance projects
- d) If PG&E only intends to maintain existing enhanced clearances, please explain why.

⁴ PG&E's WMP, p. 530.

ANSWER 001

- a) 1) PG&E is extending the minimum clearance recommendations of 12 feet in HFTD (per G.O. 95 Rule 35, Appendix E) to 12 feet within HFRA. 2) There is an anticipated increase of tree removals vs trims as it is the first course of action recommended at time of listing per the Distribution Vegetation Inspection Procedure (DRIP). Funding has been provided to account for increased removals. 3) There are tighter controls through reports and monitoring of work completion timelines.
- b) PG&E will maintain clearances where EVM work occurred. PG&E will also be prescribing a minimum radial clearance of 12 feet throughout the system within HFTD and HFRA. Two new programs, Vegetation Management for Operational Mitigation (VMOM) and Focused Tree Inspection, are likely to result in individual trees that warrant enhanced clearance where EVM was not implemented. These programs inform clearances based on available outage data and trends, as well as site and tree specific conditions. While not called out as a uniform scope, clearances in portions of these targeted circuit segments may have similarities to EVM.
- c) 1) Adopting the recommendation of 12 feet minimum clearance (in HFTD/HFRA), at time of trim 2) Deciding which locations need enhanced clearance through VMOM execution and FTI Pilots.
 - i. Based on specific AOC outage analysis of species and failure types when available.
 - ii. Based on analysis of outage data and trends by AOC. Additionally, any tree which is within MDR, will be within the MDR before next work completion cycle or is showing signs of imminent failure before next work completion cycle.
 - iii. Minimum of 12 feet of clearance or enough clearance to mitigate potential impacts to facilities if tree (whole or portion of) failure were to occur.
 - iv. PG&E prioritizes enhanced clearance projects according to the Wildfire Distribution Risk Model (WDRM) and attempts to complete work in order of highest to lowest risk whenever possible, however, operational factors including but not limited to access issues due to snow or weather, environmental limited operating periods, and agency restrictions among others may lead to a lower ranked project being completed ahead of a higher ranked project.
- d) PG&E will maintain existing enhanced clearances as well as establishing new clearances starting at a minimum of 12 feet.