

Vegetation Management Priority Tag Procedure

SUMMARY

This utility procedure presents instructions for vegetation management (VM) personnel performing patrols and observe vegetation conditions in the field that have both of the following characteristics:

- Affect overhead electric distribution facilities.
- Require Priority 1 or Priority 2 mitigation.

Such conditions may result from either encroachment into the Pacific Gas and Electric Company (PG&E) minimum clearance requirement or from potential tree or limb failure.

The following time constrains apply to each of the priority conditions:

- Priority 1 tags must be mitigated within 24 hours of identification when reported.
- Priority 2 tags must be mitigated within 20 business days, unless constrained.

For purposes of intent, this procedure does not override the patrol requirements outlined in the standards and procedures which govern those activities.

Level of Use: Informational Use

TARGET AUDIENCE

VM employees and contractors responsible for vegetation compliance around overhead electric distribution facilities.

SAFETY

NA

BEFORE YOU START

NA

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PROCEDURE STEPS

1 Identifying and Classifying Priority Level

1.1 The first responder must perform the following steps to identify and classify a priority condition:

1. ASSESS a condition conservatively AND, if unsure, IDENTIFY the condition as a Priority 1.
2. DETERMINE whether the observed condition affecting overhead electric distribution facilities requires Priority 1 or Priority 2 mitigation according to the following guidelines:
 - a. A Priority 1 condition is a hazard that meets any of the following scenarios:
 - The vegetation is in contact or showing signs of previous contact with a primary conductor.
 - The vegetation is actively failing or at immediate risk of failing and could strike the facilities.
 - The vegetation presents an immediate risk to the facilities.
 - b. A Priority 2 condition meets at least one of the following scenarios:
 - The vegetation has encroached within the PG&E minimum clearance requirements and is not in contact with a conductor.
 - The vegetation has an identifiable integrity issue that does not classify as a Priority 1 condition, is likely to strike facilities, and may manifest into a risk before the next scheduled inspection.
3. CONTINUE as follows:
 - For a Priority 1 hazard, PROCEED to [Section 2, "Handling Priority 1 Hazard."](#)
 - For a Priority 2 condition, PROCEED to [Section 3, "Priority 2 Conditions."](#)

2 Handling Priority 1 Hazards

2.1 The first responder must PERFORM the following tasks:

1. CONTACT the local vegetation program manager (VPM).
 - a. If applicable, DISCUSS interferences (see [Section 4, "Delays and Interferences"](#)).

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- 2.1 (continued)
1. TREAT each Priority 1 situation as an emergency location (e.g., a wire down condition).
 2. REMAIN onsite unless an unavoidable reason to leave exists. The situations listed below are appropriate reasons to leave a site unattended; to leave a site unattended for other reasons, OBTAIN approval from the VPM or supervising vegetation program manager (SVPM) (see [Step 2.2](#)):
 - Staying onsite is unsafe (e.g., due to a hostile customer or extreme weather conditions).
 - The site is a remote location requiring movement to gain cellular service.
 3. COORDINATE hazard mitigation activities (pruning or tree removal).
 4. CREATE a tree record OR CALL the local database management specialist (DMS) or equivalent to CREATE a tree record.
- 2.2 When requested to APPROVE LEAVING the site unattended AND before ISSUING approval, the VPM must DEVELOP a mitigation plan which includes estimations of the following information:
- Date and time of site re-occupation.
 - Date and time of completion.
- 2.3 The local DMS (or equivalent) must perform the following tasks:
1. GENERATE AND ISSUE a Priority 1 tag (i.e., work request).
 2. To “SOFT CLOSE” the work request in the system, PROVIDE specific directions to the TC to CLOSE AND INVOICE appropriately in the back office for each Priority 1 tag.
- 2.4 The TC must physically MITIGATE the Priority 1 tag within 24 hours of the initial report.
1. IF UNABLE to MITIGATE the hazard within the time limit,
THEN the TC must PROCEED to [Section 4, “Delays and Interferences.”](#)
 2. MITIGATE according to professional judgement and best management practices (see [TD-7102P-01-JA01, “Best Management Practices \(BMP\) for Vegetation Management Activities”](#)).

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3 Handling Priority 2 Conditions

- 3.1 The first responder must CREATE a tree record OR CALL the local DMS (or equivalent) to CREATE a tree record. At this point, the 20 business day timeline begins.
- 3.2 The local DMS (or equivalent) must GENERATE AND ISSUE a Priority 2 tag (i.e., work request).
- 3.3 The TC must physically MITIGATE the tagged conditions WITHIN 20 business days of record creation, unless documented in ITS with an appropriate restriction/constraint.
- CL-Clearance Request: Line clearance constraints (i.e., line kill, line drop).
 - RF-Refusal: When a customer/agency is refusing to allow the work to be performed.
 - QT-Quarantine: An environmental issue (e.g., riparian review or nesting bird).
 - AX-Access: Site cannot be accessed (e.g., snow, traffic or locked gate).
- 3.4 The TC must UPDATE the work request with the completion date and time of completion.

4 Delays and Interferences with Priority 1 Hazard Mitigation

- 4.1 IF the Priority 1 tag cannot be mitigated within 24 hours,
THEN the first responder must DISCUSS the situation and solutions with the VPM.
- 4.2 The VPM must NOTIFY the SVPM and regional manager by email of the reason for the delay and the estimated time of completion.
- 4.3 The first responder, or delegate, must PERFORM one the following steps:
1. Stay onsite until the risk is mitigated, OR
 2. Work with the TC to remove the vegetation hazard.
- 4.4 Efforts to MITIGATE the Priority 1 tag must not be DELAYED due interference by either of the following conditions:
- Customer or agency objections.
 - Environmental processes, bird nests, permits (i.e., city/county), or similar conditions.
- 4.5 The VPM or SVPM must promptly REPORT all actions PERFORMED outside the routine permit process to the appropriate agency.

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5 Changes to Priority Classifications

- 5.1 IF at any point in the mitigation process the priority classification is changed, THEN the tree record must also be updated to reflect the change in priority.

END of Instructions

DEFINITIONS

Facilities: Any PG&E-owned electrical conductors, neutral or apparatus on a pole, the pole, or any pole supporting wires with voltage levels up to 60kV, excluding service drops.

First responder: A PG&E VM employee or contractor in the field, who identifies or responds to a priority vegetation condition and can document the incident in the system of record.

Priority 1 condition: Priority code applied when any of the vegetation conditions defined in Section 1.1 are observed in the field for overhead electric distribution facilities.

A PG&E Vegetation Management Priority 1 classification aligns with CPUC General Order (G.O.) 95, "Reporting and Resolution of Safety Hazards Discovered by Utilities," Rule 18, Priority Level 1 definition as stated: An immediate safety and/or reliability risk with high probability for significant impact. Take action immediately, either by fully repairing the condition or by temporarily repairing and reclassifying the condition to a lower priority.

Priority 1 tag: When the vegetation condition is identified as a priority 1 condition and a work request has been created in the system of record.

Priority 2 condition: Priority code applied when any of the vegetation conditions defined in Section 1.1 are observed in the field for overhead electric distribution facilities.

A PG&E Vegetation Management Priority 2 classification aligns with and often exceeds the CPUC General Order (G.O.) 95, "Reporting and Resolution of Safety Hazards Discovered by Utilities," Rule 18, Priority Level 2 definition as stated: A variable (non-immediate high to low) safety and/or reliability risk. Take action to correct within specified time period (fully repair, or by temporarily repairing and reclassifying the condition to a lower priority). Time period for correction to be determined at the point of identification by a qualified company representative (overhead: 0-59 months).

Priority 2 tag: When the vegetation condition is identified as a priority 2 condition and a work request has been created in the system of record.

PG&E VM personnel: PG&E VM employees and contractors.

Refusal: When a customer or property owner refuses to allow PG&E to mitigate the priority condition.

Tree contractor (TC): The individual or crew responsible for completing the vegetation work.

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Work packet: A set of tree records assigned for inspection. Typically, assignment to a pre-inspector for field evaluation.

Work request: A record requesting specified vegetation work to be completed by a tree crew.

IMPLEMENTATION RESPONSIBILITIES

The VM team is responsible for the implementation, communication, and maintenance of this utility procedure and its associated standard.

- The VM manager must communicate this procedure to the VM stakeholders.
- The VM supervisor must communicate this procedure to the operational work teams.

GOVERNING DOCUMENT

[Utility Standard TD-7102S, "Distribution Vegetation Management Standard"](#)

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

Records and Information Management:

Information or records generated by this procedure must be managed in accordance with the Enterprise Records and Information (ERIM) program Policy, Standards and Enterprise Records Retention Schedule (ERRS). REFER [GOV-7101S, "Enterprise Records and Information Management Standard"](#) and related standards. Management of records includes, but is not limited to:

- Integrity
- Storage
- Retention and Disposition
- Classification and Protection

California Public Resource Code (PRC) 4292

California PRC 4293

California Public Utilities Commission ([CPUC](#)) [General Order \(G.O.\) 95, Rule 35](#)

[CPUC G.O. 95, Rule 18](#)

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REFERENCE DOCUMENTS

Developmental References:

Utility Procedure TD-7103P-09, "Vegetation Management Hazard Notification Procedure,"
Revision 3, dated 05/07/2019.

Supplemental References:

NA

APPENDICES

NA

ATTACHMENTS

[Job Aid TD-7102P-17-JA01, "Work Packet Generation and Soft Closure of a Work Request"](#)

DOCUMENT REVISION

Utility Procedure TD-7102P-17, "Vegetation Management Priority Procedure," Revision 2,
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DOCUMENT APPROVER

██████████ Director, Vegetation Management

DOCUMENT OWNER

██████████ Manager, Vegetation Management

DOCUMENT CONTACT

██████████ Expert Technical Writer, Vegetation Management

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REVISION NOTES

Where?	What Changed?
Throughout	Changed Priority 2 timeline from 30 days to 20 business days.
Step 1.1.2.	Added additional scenario for Priority 2 classification.
Step 2.1.3.	Restructured step. No change in instruction.
Step 2.3.2.	Restructured step. No change in instruction.
Section 5	New section.
Definitions	Changed "overhead electric distribution facilities" to "facilities;" updated. Clarified "first responder."
Document approver	Updated.