

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

PG&E Data Request No.:	CalAdvocates_008-Q004		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_008-Q004		
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 004

Regarding the new “Focused Tree Inspections” described in section 8.2.2.2.5 of PG&E’s WMP, PG&E states:

This is a new transitional program for 2023 stemming from the conclusion of the EVM program. PG&E is developing AOCs to better focus VM efforts to address high risk areas that have experienced higher volumes of vegetation damage during PSPS events, outages, and/or ignitions. We have conducted a county by- county review with regional SMEs and used this information to develop polygons where focused vegetation inspections can be evaluated to determine appropriate counties- to prioritize pilot(s). Focused Tree Inspection plans will be piloted in at least one area. The pilot will develop and implement guidelines that inform inspections.⁷

- a) Please explain what is meant by the word “transitional” in the first sentence.
- b) Does “AOCs” stand for “Areas of Concern” in this instance? If not, then please define it.
- c) Please describe PG&E’s methodology for developing the abovementioned polygons.
- d) How does PG&E determine where focused vegetation inspections can be evaluated?
- e) How does PG&E determine which counties are appropriate to prioritize for pilots?
- f) How will PG&E determine in which county or counties to execute a pilot or pilots?
- g) Please describe the following aspects of the pilot or pilots:
 - i. Scope of work
 - ii. Budget
 - iii. Duration
 - iv. Goals and objectives

⁷ PG&E’s WMP, p. 529.

- v. Success metrics
- h) Please describe the following regarding the guidelines that PG&E will develop based on the pilot(s), as mentioned above:
 - i. The expected content of the guidelines
 - ii. How PG&E expects the guidelines to inform inspections
 - iii. When PG&E expects to develop such guidelines
- i) Please describe the steps that PG&E expects a “focused tree inspection” to include.
- j) Please compare the planned “focused tree inspections” to the tree inspections previously performed as part of PG&E’s EVM program. Describe the similarities and differences.
- k) What metrics and criteria will PG&E use to determine whether a tree passes or fails a “focused tree inspection”?

ANSWER 004

- a) Similar to TRI and VMOM programs, the Focus Tree Inspection (FTI) program has been developed following the conclusion of EVM in 2022. For this program “Transitional” is used to recognize similar targeted efforts to reduce risk formerly associated with EVM that go beyond compliance mandated clearances. All three programs are intended to further reduce vegetation related outages and ignitions. The FTI program was built in response to RN-22-09 which compelled benchmarking the use of predictive and risk modeling in VM with SCE and SDG&E. As a result, PG&E has developed data and SME informed “Areas of Concern” (AOC) to pilot enhanced targeted inspections where the analysis indicates increased risk of vegetation failures in high-risk areas. Similar to EVM, the piloting of this program has been prioritized using information from the Wildfire Distribution Risk Model (WDRM). Pilots will begin in Q2 2023 in four AOC. The results and learnings from the pilots will inform the development and monitoring of a broader program as a transitional measure intended to reduce VM outages.
- b) Yes
- c) AOCs were identified through a cross-functional effort utilizing county-based regional reviews to create polygons which are geographic areas. Initial polygon development utilized Public Safety Specialist circuit-based evaluations, 30-year lookback of meteorology data, PSPS Lookback Polygons, PSPS Vegetation Damage locations, vegetation caused ignition data, and vegetation caused outage data. The process is intended to be performed annually to identify where trends, models, or emerging available data indicate higher likelihood of tree caused damage or outages.
- d) The FTI program will be piloted in four regional AOCs beginning in Q2 2023. These regional pilot areas and the resulting inspections will be evaluated and monitored to inform refinements to the program prior to larger-scale implementation. The program will rely upon ongoing evaluation to refine AOC areas and inspection scope based on these evaluations predominately informed by outage analysis.

- e) Pilot AOCs are prioritized using WDRMv3. The four pilot AOCs selected for 2023 incorporated additional reviews from the VM Execution Operational Team to select appropriate regional areas to inform the programs development.
- f) Please refer to response e). Butte, Calaveras, El Dorado, and Napa counties were selected for regional pilots.
- g) Please describe the following aspects of the pilot or pilots:
 - i. Scope of Work: Complete a focused tree inspection pilot project of ~300 OH line miles in 2023 to calibrate processes and optimize efficiencies. Inspections will utilize Tree Risk Assessment Qualification (TRAQ) Certified Arborists. Tree mitigations will be determined as necessary based on site and individual tree conditions. Pilots will begin in Q2 2023 and are intended to inform detailed SOW during the regional implementations. SOW will be standardized during the pilot phase and is subject to regional variations.
 - ii. Budget: The current budget for Enhanced Vegetation Management programs is ~\$245M, with ~\$83M allocated to the Focused Tree Inspection. These numbers are subject to change as we continue to refine the scope of the new programs.
 - iii. Duration: Pilots and regional execution experience will determine duration of projects. The program development is intended to result in larger scale implementation following the pilots. Factors such as snow, precipitation, or other storm related barriers to access pilot areas may influence the duration of pilots.
 - iv. Goals and Objectives: Complete regional pilots in alignment with RN-22-09 commitments to inform more comprehensive program development through 2023.
 - v. Success Metrics: Short-term success will ensure inspection quality through 100% QC using TRAQ-qualified arborists post-inspection. Long-term success will be evaluated/determined by reduction in vegetation caused outages or ignitions within AOC between inspection cycles.
- h) Please describe the following regarding the guidelines that PG&E will develop based on the pilot(s), as mentioned above:
 - i. The expected content of the guidelines: Initial guidance will be developed to support regional pilots. While inspection tools and data collection are expected to be standardized it is anticipated that more regional guidance will utilize historical outage data to help us identify problematic tree species and failure modes and site conditions to support focused inspection decisions and prescriptions. Guidelines will be refined through and following execution of the pilots and may include but are not limited to, program specific standards, procedures, and job aids in accordance with guidance document requirements.
 - ii. How PG&E expects the guidelines to inform inspections: Regional analysis of AOC will incorporate historical outage data to assist identification of problematic tree species and failure modes and site conditions to support focused inspection decisions and prescriptions.
 - iii. When PG&E expects to develop such guidelines: Pilot kick-off meetings are scheduled in April 2023. As provided in (h) above, inspection tools and data collection are expected to be standardized. It is anticipated that more regional

guidance will utilize historical outage data to assist identification of problematic tree species and failure modes and site conditions to support focused inspection decisions and prescriptions. Guidelines will be refined through and following execution (Q2 2023-Q4 2023) of the pilots and may include but are not limited to, program specific standard, procedure and job aids in accordance with guidance document requirements.

- i) The steps that PG&E expects a “focused tree inspection” to include.
 - i. Identify circuit segments in AOC subject to FTI
 - ii. Review regional outage analysis specific to AOC
 - iii. TRAQ Arborists will perform inspections and prescribe tree work for all assigned circuit segments
 - iv. TRAQ Arborists will perform 100% QC
 - v. Execute Tree Mitigation Work
 - vi. Monitor Performance

j)

Initiative	Inspection Scope	Overhang	Data Collection	Inspection Tools	Regional Outage Analysis	WDRM Model Prioritization
EVM	Standardized Clearance-Based Scope	Standardized Clearance-Based Scope	Survey 1,2,3	TAT	No	Yes
FTI	TRAQ Arborist Determined Level 1 or Level 2	Selective	OneVM	TRAQ Form	Yes	Yes

- k) Pass or Fail criteria is not anticipated for the FTI program. FTI will use TRAQ Certified Arborists to perform inspections and prescribe work based on site and tree specific conditions. Some trees will be trimmed and other will be removed to address associated risk between inspection cycles.