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FILSINGER ENERGY  
P A R T N E R S

PACIFIC GAS & ELECTRIC  
SONOMA COUNTY SAFETY MONITOR  
SECOND ANNUAL COMPLIANCE REPORT

June 26, 2024



## EXECUTIVE SUMMARY

Filsinger Energy Partners, Inc. (“FEP”) is engaged to serve as the Sonoma County Safety Monitor (the “Monitor”) pursuant to the terms of the Stipulated Final Judgment (the “Judgment”), dated April 11, 2022 (the “Effective Date”), by and among and Pacific Gas and Electric Company (“PG&E”) and Sonoma County, as well as that certain Retention Agreement for Sonoma Monitoring Services, dated as of the Effective Date, as amended on May 17, 2022, and August 25, 2022, between FEP and PG&E (the “Agreement”).<sup>1</sup> FEP will serve as the Monitor for a period of five years from the Effective Date (the “Effective Period”) plus any “Cure Periods” extending beyond the initial five years (the “Monitorship”). In this capacity, the Monitor has compiled this second Annual Compliance Report for the period from the Effective Date through April 10, 2024, the second year of the Monitorship.

The Monitor’s role, as described in the Judgment, is to monitor PG&E’s compliance with various commitments related to recovery from the 2019 Kincade Fire in Sonoma County and PG&E’s ongoing efforts to prevent wildfires in the future. To that end, the Monitor assesses PG&E’s compliance with its stated annual commitments and conducts quality assurance sampling reviews of PG&E inspections on its own electric transmission and electric distribution assets, as well as PG&E’s vegetation management patrols. PG&E’s failure to meet one or more of the “Performance Commitments” or “Sonoma Inspection Work Commitments” described in the Judgment results in a “Deficiency” as determined by the Monitor. When the Monitor determines the existence of a Deficiency, the Monitor and PG&E will follow the notice, meet and confer, and cure procedures set forth in the Judgment. The Monitor regularly communicates with PG&E and the District Attorney of Sonoma County (the “Sonoma D.A.”) and sends all parties written notice of any Deficiencies identified by the Monitor. The Monitor also maintains a “Dashboard” to provide the parties with a visual representation of the location, type, and cure status of the various Deficiencies.

This Second Annual Compliance Report has been prepared by the Monitor for PG&E and the Sonoma D.A., and includes the following items:

- Deficiency identification and reporting process;
- Updates on PG&E’s performance and progress towards meeting the Performance Commitments set forth in the Judgment;
- Updates on PG&E’s performance and progress towards meeting Sonoma County Inspection Work Commitments set forth in the Judgment, including its compliance with

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<sup>1</sup> The Agreement also governs FEP’s role in the “North State Counties” (Plumas, Lassen, Tehama, Shasta, and Butte Counties) as the North State DAs’ Safety Monitor pursuant to the terms of the Plumas Superior Court Stipulated Final Judgment, dated April 11, 2022, which arose from the 2021 Dixie Fire. While the Agreement governs both the Sonoma County and North State Counties monitorships, this Annual Compliance Report is focused on Sonoma County. A separate annual report will be issued by FEP in connection with its work on behalf of the North State Counties.



associated 2023 commitments under PG&E’s 2023-2025 Wildfire Mitigation Plan and internal procedures;

- Deficiencies identified by the Monitor during the second year of the Monitorship; and
- General considerations identified by the Monitor during the second year of the Monitorship.

The following table summarizes the Monitor’s findings with respect to the Performance Commitments, the Sonoma County Inspection Work Commitments, and Deficiencies issued through the second year of the Monitorship.

Commitments	Findings from the 2 <sup>nd</sup> Year of the Monitorship
<i>Jobs and Hiring</i>	PG&E confirms that it has incorporated the hiring commitments outlined in the Judgment into its work and resource planning and has hired 44 incremental positions since the Effective Date in Sonoma County. PG&E indicates that it is on track to fulfill all commitments by the end of the Effective Period.
<i>Training - SRJC Fire Tech Program</i>	The Sonoma D.A. confirms that PG&E has made all required training funding payments for 2023 pursuant to the Judgment.
<i>Training - VM Training Program</i>	The Sonoma D.A. confirms that PG&E has timely made all required training funding payments pursuant to the Judgment. <i>Commitment complete.</i>
<i>All Sides Inspection Pilot Program</i>	PG&E confirms that it completed the All Sides Inspection Pilot Program as described in the Judgment and has implemented certain VM programs in 2023 as informed by such program. <i>Commitment complete.</i>
<i>Electric Transmission Asset Inspections</i>	<p>PG&amp;E confirms that it completed 984 aerial inspections and 1,354 ground inspections of High Fire Threat District (HFTD) transmission structures in 2023. As this was the first year of a three-year cycle, the Monitor has determined that PG&amp;E complied with the WMP commitment for electric transmission inspections for 2023.</p> <p>The Monitor identified one Deficiency resulting from reviews of Transmission Asset Inspections during the second year of the Monitorship.</p>
<i>Electric Distribution Asset Inspections</i>	<p>PG&amp;E confirms that 11,762 distribution structures in Sonoma County were inspected during the 2023 work year.</p> <p>The Monitor identified two Deficiencies resulting from reviews of Distribution Asset Inspections during the second year of the Monitorship.</p>
<i>Vegetation Management Inspections</i>	<p>PG&amp;E confirms that both routine vegetation management and tree mortality patrol inspections were conducted on all Sonoma County distribution circuits in HFTD during the 2023 work year.</p> <p>The Monitor identified 131 Deficiencies resulting from reviews of Vegetation Management Inspections during the second year of the Monitorship.</p>



<i>Enhanced Powerline Safety Settings (EPSS)</i>	PG&E confirmed the installation of EPSS on all distribution circuits in HFTDs in Sonoma County by December 31, 2022. Within Sonoma County, at least 2,262 miles of electric distribution circuits are EPSS-capable. <i>Commitment complete.</i>
<i>Public Safety Power Shutoff (PSPS)</i>	PG&E did not initiate any PSPS events in Sonoma County during the second year of the Monitorship.

As provided in the Judgment, the Monitor will hold an “Annual Meeting” with PG&E, to which the Sonoma D.A. will be invited, to report on PG&E’s progress toward and compliance with the Performance Commitments and the Sonoma County Inspection Work Commitments, including any anticipated Deficiencies identified to date, and provide a forum for PG&E and the Sonoma D.A. to discuss the Monitor’s updates. In accordance with the Judgment, the Monitor provides this Annual Compliance Report to PG&E and the Sonoma D.A. in advance of the Annual Meeting.



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## INTRODUCTION

Filsinger Energy Partners, Inc. (“FEP”) is engaged to serve as the Sonoma County Safety Monitor (the “Monitor”) pursuant to the terms of the Stipulated Final Judgment (the “Judgment”), dated April 11, 2022 (the “Effective Date”), by and among and Pacific Gas and Electric Company (“PG&E”) and Sonoma County. Pursuant to that certain Retention Agreement for Sonoma Monitoring Services, dated as of the Effective Date, as amended on May 17, 2022, and August 25, 2022, between FEP and PG&E (the “Agreement”), FEP is engaged to monitor PG&E’s compliance with the Performance Commitments and Sonoma Inspection Work Commitments (each as defined in the Judgment and described below). FEP will serve as the Monitor for a period of five years from the Effective Date (the “Effective Period”) plus any “Cure Periods” extending beyond the initial five years (the “Monitorship”).

PG&E’s retention of the Monitor is stipulated by the Judgment, which outlines a specific scope of work for the Monitor’s active monitoring of certain safety and risk aspects of PG&E’s electric operations and infrastructure. The Monitor identifies and performs its monitoring activities within the specific scope outlined in the Judgment.

The Judgment emerges out of the Kincade Fire, a wildland fire that started in the hills northeast of Geyserville in Sonoma County on Wednesday, October 23, 2019. The Kincade Fire was ignited when an energized open jumper on a PG&E-operated transmission tower (Tower 001/006) broke due to wear induced by wind, leading to a phase to ground fault. Leading up to the Kincade Fire, Sonoma County had been placed under a Red Flag Warning issued by the National Weather Service and the ignition itself took place during an ongoing power de-energization. The conflagration burned for 14 days across 77,758 acres across both wildland and wildland urban interface before being fully contained on November 6, 2019. Over 186,000 Sonoma County residents were evacuated from their homes. Four injuries were reported, and 374 structures were destroyed. The Kincade Fire was the largest fire in California for the 2019 fire year.

The purpose of this Second Annual Compliance Report is for the Monitor to review and assess PG&E’s progress toward and compliance with the Performance Commitments and the Sonoma County Inspection Work Commitments (the “Inspection Work Commitments”) set forth in the Judgment during the second year of the Monitorship. The Monitor conducts its review and assessment activities through data requests, interviews, attending operational meetings and trainings, shadowing inspectors, and conducting quality assurance sampling of the inspections performed by PG&E within High Fire Threat Districts (“HFTDs”) in Sonoma County.

The Monitor is independent from PG&E and Sonoma County, as represented by the District Attorney for Sonoma County (the “Sonoma D.A.”). The retention of the Monitor and the scope of the Monitor’s services were mutually agreed upon by PG&E and the Sonoma D.A. The Performance Commitments and Inspection Work Commitments set forth in the Judgment apply specifically to Sonoma County. PG&E’s failure to meet one or more of the Performance



Commitments or the Inspection Work Commitments at the time it is due, or a material failure by PG&E to perform the Inspection Work Commitments during the Monitorship, results in a “Deficiency” as determined by the Monitor. When the Monitor determines the existence of a Deficiency, the Monitor and PG&E will follow the notice, meet and confer, and cure procedures set forth in the Judgment.

The Monitor issued its First Annual Compliance Report on June 2, 2023 (the “First Annual Compliance Report”). As this is the Monitor’s Second Annual Compliance Report, the reporting period encompasses April 11, 2023, through April 10, 2024. As outlined in the Judgment, the Monitor will hold an Annual Meeting with PG&E, to which the Sonoma D.A. will be invited, to discuss this Second Annual Compliance Report and report on PG&E’s progress toward and compliance with the Performance Commitments and the Inspection Work Commitments two years into the Monitorship.



## DEFICIENCY IDENTIFICATION AND REPORTING

PG&E's failure to meet one or more of the Performance Commitments or the Inspection Work Commitments at the time it is due, or a material failure by PG&E to perform the Inspection Work Commitments during the Monitorship, results in a "Deficiency" as determined by the Monitor. For purposes of determining a Deficiency based on an Inspection Work Commitment, the failure must not be a failure in existence as of the Effective Date but must be based on a failure occurring after the Effective Date. Deficiencies based on failure to comply with a Performance Commitment are identified in the Annual Compliance Reports. Deficiencies based on failure to meet one or more of the Inspection Work Commitments will be noticed to PG&E and the Sonoma D.A. at any time during the Monitorship and must identify the nature and location of the specific failure. When the Monitor determines the existence of a Deficiency, the Monitor and PG&E will follow the notice, meet and confer, and cure procedures set forth in the Judgment and described below.

To determine the existence of a Deficiency, the Monitor analyzes whether the potential failure violates PG&E's commitment or obligation under (i) applicable regulation, (ii) PG&E's then applicable Wildfire Mitigation Plan ("WMP"),<sup>2</sup> or (iii) PG&E's then operative internal standards and procedures. If the Monitor determines that a violation has occurred, the Monitor issues written notice of the Deficiency to PG&E and the Sonoma D.A. (each a "Deficiency Notice"). PG&E and the Monitor then meet and confer regarding the Deficiency within ten business days following the Deficiency Notice. PG&E then prepares and presents a written cure proposal to the Monitor within five business days following the meet and confer. After receipt of the written cure proposal, the Monitor can either accept or object to the cure proposal within ten business days. If the Monitor accepts the cure proposal, the Monitor will confirm completion of the proposed cure by the agreed-upon cure deadline, and fulfillment of that cure proposal constitutes a complete cure of the Deficiency. If the Monitor objects to the cure proposal, PG&E and the Monitor will meet and confer again within five business days of the objection to agree upon an amended cure proposal. The following flow chart depicts the aforementioned process.

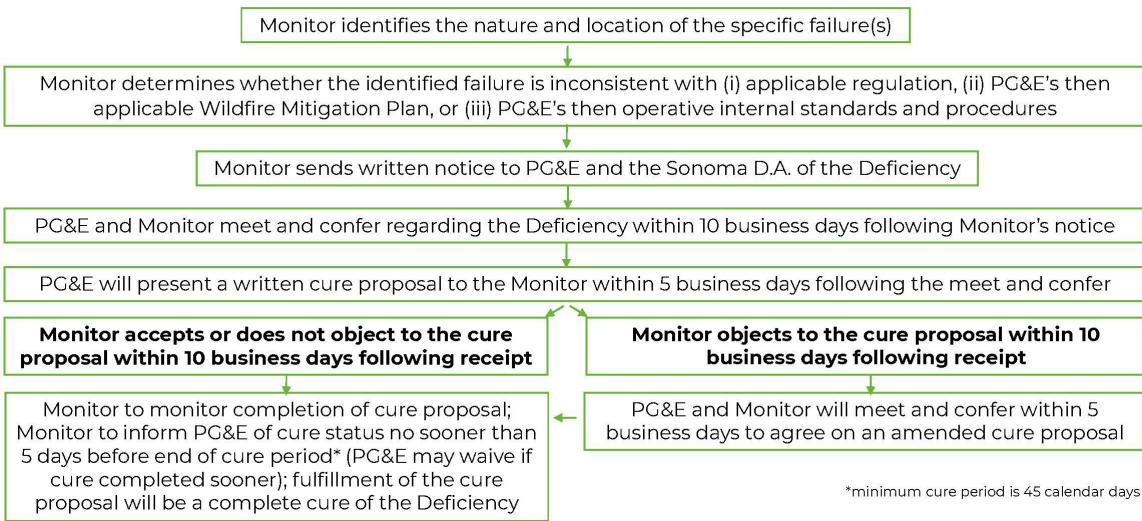
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<sup>2</sup> The applicable WMP for the second year of the Monitorship is the 2023-2025 Wildfire Mitigation Plan Revision 4-1 ("WMP R4-1"), filed with the Office of Energy Infrastructure Safety (the "OEIS") on June 7, 2024.





### Meet and Confer / Cure Process





## PERFORMANCE COMMITMENTS

This section of the Annual Compliance Report addresses PG&E’s performance and progress towards meeting the Performance Commitments for the year under review and includes references to the relevant Performance Commitments described in the Judgment. The Judgment presents each of the six Performance Commitments under three categories: Jobs and Hiring, Training Program, and Pilot Program. Each Performance Commitment presented in this section begins with the corresponding commitment language from the Judgment followed by the Monitor’s analysis of PG&E’s progress toward or compliance with the commitment.

### Performance Commitment 1 (Jobs and Hiring)

#### Judgment Commitment

PG&E shall create and post a minimum of 100 new positions headquartered in or serving Sonoma County.

- i. These positions may include positions relating to electric systems inspections including drone inspection reviewers, electric system vegetation management inspections and supervision, Electric Operations, and Gas Operations.
- ii. These positions may include the creation of new positions, the conversion of what is currently a contractor role to employee positions, or the movement of existing PG&E positions not currently headquartered in Sonoma County into Sonoma County.

### Performance Commitment 2 (Jobs and Hiring)

#### Judgment Commitment

The positions posted pursuant to Commitment 1 will be positions that, if filled, will increase the ratio of employees to contractors across those job categories specified in Commitment 1, in Sonoma County, from a current average total ratio of approximately 39% to an average total ratio of at least 60% employees. The calculation of the ratio in Commitment 2 will exclude the temporary use of workers/contractors for emergency-related, restoration, and undergrounding work.

### Performance Commitment 3 (Jobs and Hiring)

#### Judgment Commitment

PG&E will fill at least 80 of the positions in Commitment 1 by the end of the Effective Period.

#### Commitments Analysis

With respect to Performance Commitments 1 through 3, PG&E responded on June 12, 2024, to the Monitor’s status inquiry as follows:

*“PG&E has been incorporating hiring commitments into work and resource planning and is continuing to do so for future year work and resource planning. PGE is on track to meet these*



*commitments by the end of the effective period.*

*As of May 31, 2024, PG&E has filled a total of 44 incremental positions since the effective date in the Sonoma County.”*

## Performance Commitment 4 (SRJC Fire Technology Program)

### Judgment Commitment

Within 90 days of the Effective Date, PG&E and Santa Rosa Junior College (“SRJC”) will meet and confer to develop a plan to work collaboratively to expand and enhance the Fire Technology Program of the Public Safety Training Center and the Wildfire Resilience Program (the “SRJC Plan”). The SRJC Plan will be subject to review and approval by the Sonoma D.A. Thereafter, PG&E will provide the SRJC Plan to the Sonoma County Safety Monitor (as defined below) for review and monitoring of its implementation.

During the Effective Period, PG&E will work with SRJC to implement the SRJC Plan. Such collaboration will include:

- i. Providing \$5 million to SRJC to be used for expanding and enhancing the Fire Technology Program of the Public Safety Training Center and the Wildfire Resilience Program. Such funding may be used for, among other things: site acquisition and development; equipment purchases; instructional program support; and developing and implementing curriculum;
- ii. Making available existing PG&E wildfire safety related curriculum and materials and sharing PG&E’s wildfire safety related data, such as fire spread modeling; and
- iii. Working with SRJC to develop new or enhanced wildfire related curriculum and training.
- iv. In the event that PG&E and SRJC are unable to agree upon or implement the SRJC plan within the required timeframe, or if the Sonoma D.A. does not consent to the SRJC Plan, then PG&E and the Sonoma D.A. will mutually agree on an alternate fund benefitting local non-profit organizations in Sonoma County, and PG&E will pay to that fund five million dollars (\$5,000,000) on the timeline on which PG&E would have paid this allocation to SRJC, as set out in Paragraph 26(b).

The payments stipulated under Commitment 4 are to be made on a schedule laid out in the Judgment. The schedule is as follows:

- i. A payment of \$1.5 million on or before December 31, 2022;
- ii. A payment of \$1.5 million on or before December 31, 2023;
- iii. A payment of \$1 million on or before December 31, 2024;
- iv. A payment of \$500,000 on or before December 31, 2025; and
- v. A payment of \$500,000 on or before December 31, 2026.

### Commitment Analysis

With respect to Performance Commitment 4, PG&E provided the Monitor with a copy of the SRJC Plan on November 4, 2022, and reported the following:



*“Representatives of PG&E and Santa Rosa Junior College (SRJC) met and conferred virtually on multiple occasions in June and July 2022, including but not limited to June 13, 23, 27, and 29 as well as July 7 and 11. Those discussions culminated in the Memorandum of Understanding (MOU) between PG&E and SRJC setting out SRJC’s Plan to develop its curriculum and programs for Fire Safety and Vegetation Management, including, among other things, PG&E’s role in furthering SRJC’s Plan. The MOU was delivered to the Sonoma County District Attorney (SCDA) on July 11, 2022, and approved by the SCDA on July 19, 2022.”*

With respect to Performance Commitment 4 in Year 2, PG&E responded on June 12, 2024, to the Monitor’s status inquiry as follows:

*“PG&E is continuing to partner with the SRJC as agreed per the MOU. PG&E has also collaborated with SRJC on the following specific actions:*

- *PG&E connected Benjamin Goldstein, dean at SRJC, with Annie Rafferty from Butte-Glenn Community College.*
- *PG&E has established check-in meetings between PG&E Vegetation Management leaders and SRJC to provide ongoing support to SRJC in implementing the MOU.*
- *Other highlights from Year 2 of the MOU include:*
  - o *PG&E Participation in SRJC Job Fair: On 4/24/2024, PG&E recruiters participated in a Job Fair at SRJC. Over 150 students participated, along with 21 other employers. The Job Fair demonstrated a huge demand for skilled tradespeople in the local economy and employers’ confidence in the quality of the SRJC Career Education programs.*
  - o *Fire Technology Graduations: 39 recruits graduated in the 104th Fire Academy (December 2023) and 39 recruits graduated in the 105th Fire Academy (May 2024). Across Fall 2023 and Spring 2024, there were approximately 600 students enrolled in the various Fire Technology classes including the Fire Academy.*
  - o *Fire Technology Scholarships: Fire Technology students were awarded \$6,000 in scholarships last fiscal year.*

*All payments have been made on time to SRJC.”*

The Sonoma D.A. confirmed via documentation provided by PG&E to the Monitor that PG&E has made timely payment of the required \$1.5 million in 2022 and the required \$1.5 million in 2023 pursuant to Performance Commitment 4. The Monitor will continue to assess PG&E’s compliance with this Commitment during the third year of the Monitorship.

## Performance Commitment 5 (Vegetation Management Training Program)

### Judgment Commitment

PG&E will provide one million dollars (\$1,000,000) to fund training programs at Santa Rosa



Junior College (“SRJC”) as follows:

Timing of funding:

- i. A total of \$500,000 within 60 days of the Effective date; and
- ii. A total of \$500,000 by December 31, 2023.

The money provided to SRJC will fund one or more of the following:

- i. Funding for a training program modeled after the tree crew and pre-inspector training program that debuted at Butte College in 2020, including funding for instructor or instructional support salaries, gear, curriculum development, and tuition for participants;
- ii. Transportation and housing for participants in the tree crew and pre-inspector training program;
- iii. Labor market studies, recruitment and/or marketing for the tree crew and pre-inspector training program;
- iv. Sponsorship/wage replacement to be paid to trainees upon completion or graduation from the program; and/or
- v. Other vocational training programs related to the utility industry or wildfire resilience as SRJC in its reasonable business judgment determines.

#### Commitment Analysis

With respect to Performance Commitment 5, PG&E responded on June 12, 2024, to the Monitor’s status inquiry as follows:

*“PG&E is continuing to partner with the SRJC as agreed per the MOU. PG&E has also collaborated with SRJC on the following specific actions:*

- *SRJC received the statewide curriculum developed by Butte College (known as the Tree Crew Training and Certificate Program).*
- *Tree Risk Assessment Qualification (TRAQ):*
  - o *From 4/3/2024 to 4/5/2024, SRJC hosted a 3-day TRAQ program in collaboration with PG&E and the Western Chapter of the International Society of Arboriculture. TRAQ is a specialized credential focused on tree risk assessment and is used in Utility Vegetation Management (UVM) to identify trees that threaten powerlines. 18 students completed the course, including three PG&E employees and representatives from several different PG&E Vegetation Management Contractors.*
- *Utility Line Clearance Arborist Training Program:*
  - o *From 7/8/2024 through 8/8/2024, SRJC will offer the second Utility Line Clearance Arborist Training Program at SRJC’s Shone Farm. This is a 200-hour training program developed with input from PG&E and other utilities. Topics include vegetation management, tree identification, tree biology, pruning techniques, safe equipment operations, tree climbing techniques, customer service, and more. The target number of students is 20, and we will host a Job Fair on the last day (8/8/2024) with PG&E recruiters and PG&E Vegetation Management*



*Contractors.*

- *PG&E Power Pathway, Entry to Vegetation Management:*
  - o *From 3/4/2024 to 3/8/2024, SRJC hosted the in-person instruction component of the PG&E Power Pathway Entry to Vegetation Management Program. The PG&E Power Pathway Entry to Vegetation Management is a talent development pipeline program that leads to jobs at PG&E. All 15 graduates of the PG&E Power Pathway program obtained one-year contracts with PG&E as Vegetation Management Inspectors with the opportunity to be converted into permanent employees within the year.”*

The Monitor confirms that PG&E has timely made all payments pursuant to Performance Commitment 5.

*Performance Commitment 5 is complete.*

Performance Commitment 6 (Vegetation Management Inspection Pilot Program)

Judgment Commitment

Through 2022, PG&E will run a pilot program on a process to perform visual assessment on all sides of potential strike trees on designated routine distribution vegetation management patrols in High Fire Threat Districts (“HFTDs”) within Sonoma County. In 2023, PG&E will implement a process to perform visual assessment on all sides of potential strike trees on designated routine distribution vegetation management patrols in HFTD miles within Sonoma County; this process will be informed by the 2022 pilot program.

Commitment Analysis

With respect to Performance Commitment 6, PG&E indicated the completion of its 2022 Vegetation Management Inspection Pilot Program (the “All Sides Pilot”) on March 3, 2023, and provided the following statement:

*“PG&E completed the All Sides pilot program as previously noted. PG&E is incorporating the learnings from the pilot, along with the learnings from other vegetation management processes as well as other operational mitigations, in its overall VM plan for 2023 to further reduce risk on the system. The company expects it will be sharing more details of the 2023 VM plan in the near term.”*

The Monitor participated in presentations and interviews with PG&E regarding the All Sides Pilot and reviewed various program related documents. PG&E indicated that the All Sides Pilot took place between December 2021 and April of 2022 across 15 distribution vegetation management (“VM”) projects in HFTD service areas representing approximately 285 line miles across approximately 3,400 VM locations. The project required PG&E VM inspectors to perform a visual assessment of all sides of potential strike trees during VM patrols and use a checklist of eleven criteria to prescribe tree work. An affirmative answer to any of these criteria would result in an automatic prescription for removal.





After the completion of the All Sides Pilot, PG&E indicated that the exercise yielded several findings, including but not limited to the following:

- i. The All Sides Pilot protocols drove a 40-50% increase in inspection time as compared to routine VM patrols.
- ii. The All Sides Pilot yielded a ninefold increase in the number of trees prescribed for removal, as compared to the inspection standards used under routine VM patrols.
- iii. The outcomes of the All Sides Pilot are comparable to the Enhanced Vegetation Management (“EVM”) program,<sup>3</sup> which was discontinued at the end of 2022, in terms of ignition risk reduction and the volume of tree removals prescribed. PG&E believes that both programs over-rotate to removals and reduce ignition risk by approximately 5%.
- iv. The use of the All Sides Pilot inspection methodology would be difficult to implement operationally across PG&E’s service territory. Notably, the inspection methodology and checklist were not easily adopted by inspectors, who were more familiar with the implementation of International Society of Arboriculture (“ISA”) standards.
- v. Enhanced Powerline Safety Settings (“EPSS”), which are discussed in greater detail below, have proven much more effective at ignition reduction than the All Sides Pilot and the EVM program.<sup>4</sup>

As a result of these findings, PG&E determined not to implement the All Sides Pilot program across the company's entire service area. Rather, PG&E informed the Monitor that it would conduct a new pilot program starting in Q2 2023 to conduct a Focused Tree Inspections (“FTI”) program in “Areas of Concern”, a process that involves performing an additional patrol on certain of PG&E's highest wildfire risk circuits identified through predictive and risk modeling. PG&E initially identified Areas of Concern that cover portions of 20 counties in its service territory. The FTI program includes a “100% QC” process that will be conducted by ISA certified arborists with Tree Risk Assessment Qualification (“TRAQ”) training. PG&E indicated that the FTI program would incorporate a “Level 2” (i.e., all sides) tree risk assessment on potential vegetation hazards to overhead electric facilities. The assessment involves inspecting vegetation with strike potential, assessing the likelihood of impact upon failure, and using professional judgment to determine necessary mitigation actions. In 2023, PG&E set a target to inspect 250 circuit miles system-wide and reported completing 266.6 miles.

On June 12, 2024, PG&E provided the following additional statement:

*“PG&E completed the All Sides pilot program in 2022 and implemented an all sides assessment of potential strike trees in designated areas of routine distribution vegetation management patrols in HFTD in 2023. PG&E incorporated the learnings from the pilot, along with the*

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<sup>3</sup> The EVM program, which applied to a portion of PG&E’s distribution circuits each year, expanded radial and overhang clearance and evaluated potential strike trees using PG&E’s Tree Assessment Tool, which exceeded regulatory requirements for distribution circuits. Judgment, page 12.

<sup>4</sup> EPSS is not mutually exclusive with the All Sides Pilot or EVM.



*learnings from other vegetation management processes as well as other operational mitigations, in its overall VM plan for 2023 to further reduce risk on the system. Specifically, the company implemented the Focused Tree Inspection (FTI) program, which focuses on areas of particular risk in the service territory and uses enhanced inspection techniques, including level 2 inspections on all trees with strike potential. The adoption of level 2 inspections in the FTI program was informed from learnings from the All Sides programs along from other wildfire risk programs. Level 2 inspections are also incorporated into the Tree Removal Inventory (TRI) program as well as on an as-needed basis during Routine and Second patrols.”*

*Performance Commitment 5 is complete.*





### **Status of Performance Commitments**

During the second year of the Monitorship, PG&E has complied with all Performance Commitments, and the Monitor has not issued any Deficiencies relating to the Performance Commitments.



## INSPECTION WORK COMMITMENTS

This section addresses PG&E's performance and progress towards meeting the Inspection Work Commitments for the year under review. The five Inspection Work Commitments relate to the following areas of PG&E's operations: electric transmission asset inspections, electric distribution asset inspections, VM inspections, EPSS, and Public Safety Power Shutoff. Each Inspection Work Commitment presented in this section begins with the corresponding commitment language from the Judgment, followed by any additional related commitments set forth in the WMP or PG&E's internal standards and procedures (as applicable), followed by the Monitor's analysis of PG&E's progress toward or compliance with the commitments. For the inspection related commitments, each sub-section concludes with a description of the Monitor's quality assurance sampling reviews of PG&E's inspections and a discussion of Deficiencies issued in connection therewith for reviews conducted during the second year of the Monitorship.



## Inspection Work Commitment (Electric Transmission Inspections)

### Judgment Commitment

PG&E shall conduct Enhanced Equipment Inspections<sup>5</sup> (and any associated repairs or corrective work as identified and prioritized on the then-operative annual risk- informed work plans) on electric transmission assets located in Sonoma County, pursuant to the then-applicable WMP and annual work plans ... PG&E shall submit annual plans for the safety inspections of those assets in Sonoma County to the Sonoma County Safety Monitor for review and feedback, and the Sonoma County Safety Monitor will use these annual plans to help fulfill its monitoring duties as set out in this Judgment.

### 2023-2025 WMP Commitment

Transmission structures in HFTD and High Fire Risk Areas (“HFRA”) are inspected via (i) ground inspection and (ii) aerial detailed inspection at least once every three years. In 2023, PG&E will introduce a staggered approach to ground and aerial inspections leaving less time between inspections throughout the 3-year baseline cycle.<sup>6</sup>

### Commitments Analysis:

PG&E reported to the Monitor that 984 aerial inspections and 1,354 ground inspections of its electric transmission structures in HFTD and HFRA in Sonoma County were completed during the 2023 work year.

As 2023 was the first year of the three-year cycle prescribed by the WMP, the Monitor has determined that PG&E complied with the 2023-2025 WMP commitment for electric transmission inspections for 2023. The Monitor plans to review PG&E’s electric transmission inspections for 2024 and 2025 to confirm compliance with the three-year cycle commitment.

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<sup>5</sup> PG&E conducts enhanced inspections for electric transmission assets in HFTDs and HFRA’s using at least two detailed inspection methods per year: ground and aerial (“Enhanced Equipment Inspections”). Judgment, page 11. As described in the following paragraph, the requirement that both ground and aerial inspections be conducted in the same year was modified in the 2023-2025 WMP.

<sup>6</sup> WMP R4-1, pp. 470-474.



### Transmission Inspection Reviews

Enhanced inspections of overhead transmission assets seek to proactively identify and treat pending failures of asset components which could create a fire ignition if left unresolved or allowed to “run to failure.” Enhanced inspections, defined as Enhanced Equipment Inspections in the Judgment, involve at least two detailed inspection methods per structure: ground and aerial. These inspection methods involve visual examinations of the assets with the use of inspection checklists. Aerial inspections may be completed either by drone, helicopter, or aerial lift.

The Monitor conducts quality assurance sampling reviews of PG&E transmission asset inspections through (i) field review sampling of asset inspections, and (ii) desktop reviews of transmission assets using aerial images and inspection attainment reports obtained from PG&E. Depending on the type of PG&E transmission inspection being reviewed (e.g. ground or aerial), the Monitor’s personnel complete the corresponding inspection checklist and then compare their assessment with the most recent inspection checklist completed by PG&E’s inspector. The Monitor records any discrepancies and analyzes the underlying condition to determine whether it rises to the level of a Deficiency under the Judgment.

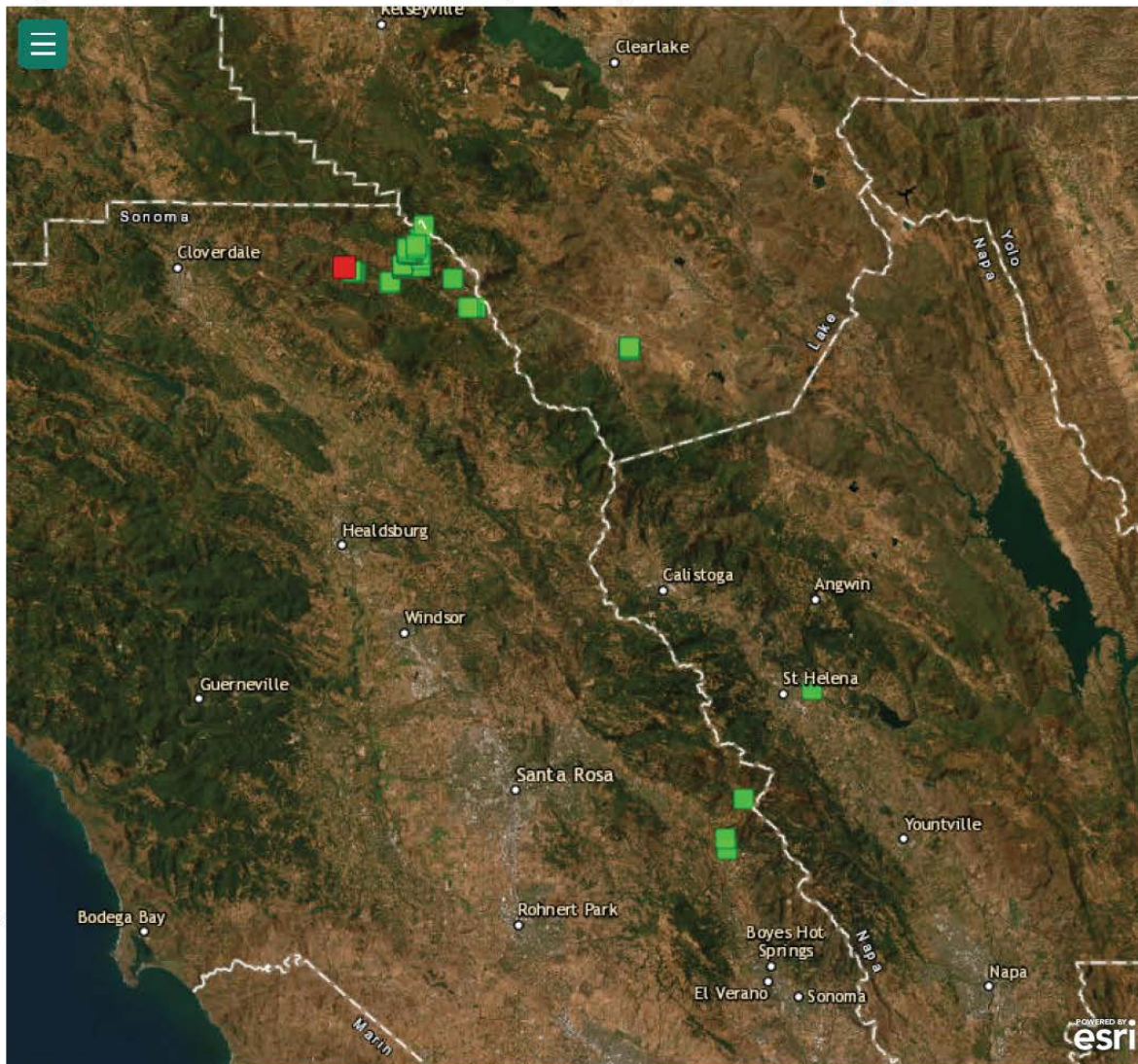
During the second year of the Monitorship, the Monitor reviewed PG&E inspections of 51 transmission assets in Sonoma County. The Monitor’s reviews of PG&E’s electric transmission asset inspections identified one Deficiency resulting from reviews conducted during the second year of the Monitorship, which was pending a cure proposal agreed upon between the Monitor and PG&E as of June 14, 2024.

The following graphics from the Monitor’s Dashboard show (i) the locations of the transmission assets reviewed during the second year of the Monitorship and Deficiencies identified in connection such reviews, and (ii) the locations of the transmission assets reviewed since the beginning of Monitorship and Deficiencies identified in connection such reviews.



## Sonoma County - Transmission - Year 2

**PG&E Inspected Transmission Assets Reviewed by Monitor During Year 2 of the Monitorship**  
Inspection Review Locations Identified in **Green** , Deficiency Locations Identified in **Red**



**Total PG&E Inspected  
Transmission Assets  
Reviewed by Monitor**

**51**

**Number of Transmission  
Assets Reviewed by  
Monitor with Deficiencies**

**1**

**Percentage of Monitor  
Reviewed Transmission  
Assets with Deficiency**

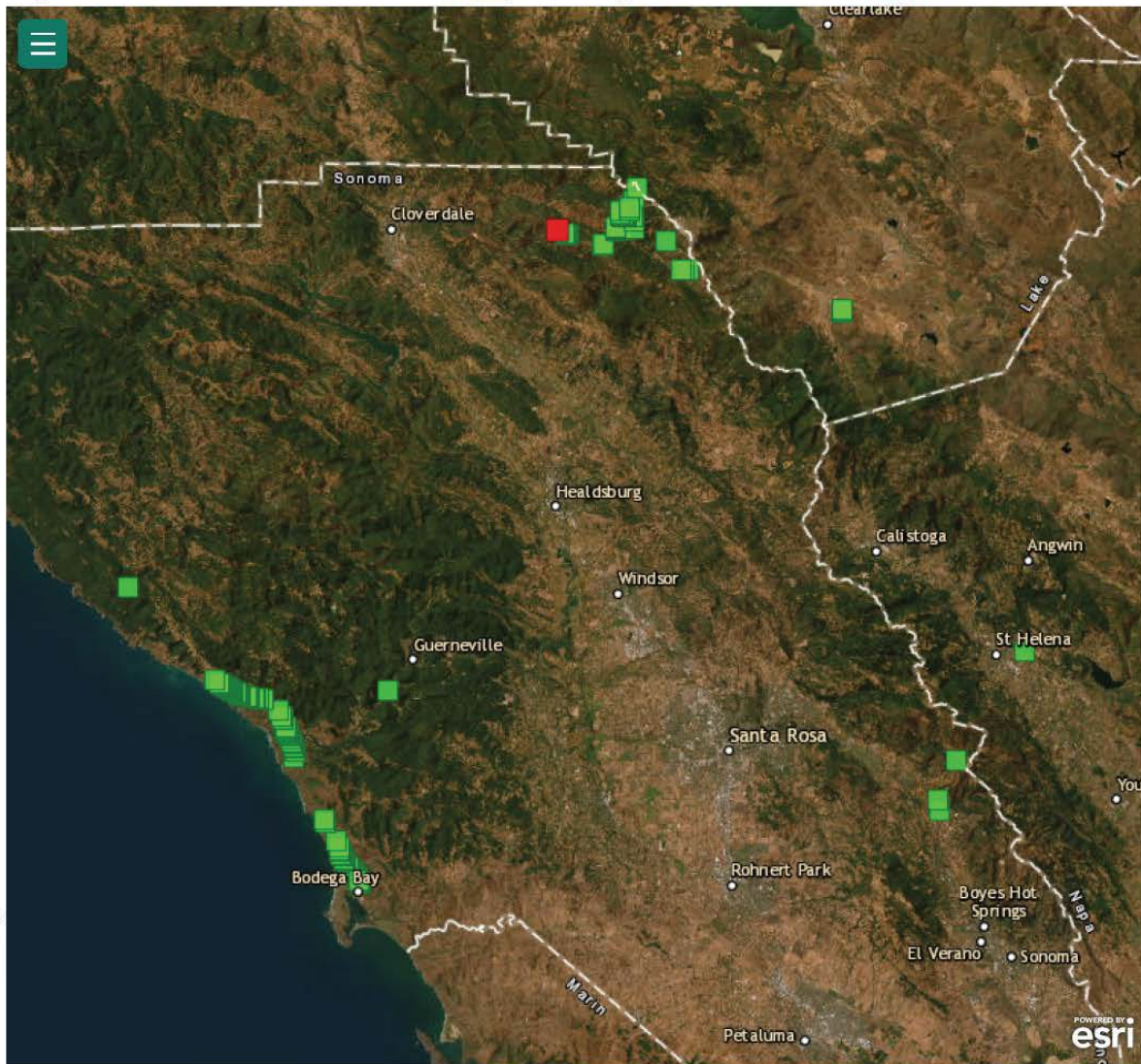
**1.96%**





## Sonoma County - Transmission - Cumulative

**PG&E Inspected Transmission Assets Reviewed by Monitor Since the Start of the Monitorship**  
Inspection Review Locations Identified in **Green**, Deficiency Locations Identified in **Red**



**Total PG&E Inspected  
Transmission Assets  
Reviewed by Monitor**

**123**

**Number of Transmission  
Assets Reviewed by  
Monitor with Deficiencies**

**1**

**Percentage of Monitor  
Reviewed Transmission  
Assets with Deficiency**

**0.81%**



## Inspection Work Commitment (Electric Distribution Inspections)

### Judgment Commitment

PG&E shall conduct safety inspections (and any associated repairs or corrective work as identified and prioritized on the then-operative annual risk-informed work plans) on electric distribution assets located in Sonoma County pursuant to the then-applicable WMP and annual work plans. PG&E shall submit annual plans for the safety inspections of those assets in Sonoma County to the Sonoma County Safety Monitor for review and feedback, and the Sonoma County Safety Monitor will use these annual plans to help fulfill its monitoring duties as set out in this Judgment.

### 2023-2025 WMP Commitment

For the WMP period of 2023-2025, PG&E designated plat maps across its service territory as extreme, severe, high, medium, or low consequence based on the average wildfire consequence of the structures within each plat map.<sup>7</sup> PG&E developed an inspection frequency recommendation for each consequence level: extreme and severe consequence plat maps will be inspected annually; high consequence plat maps will be inspected every other year; and all other plat maps will be inspected once every three years. The detailed schedule for the inspections is developed based on operational field knowledge, coordination with other programs (such as patrols), and constraints, including restricted physical access periods.

### Commitments Analysis:

Table 1. PG&E 2023 Work Plan Distribution Asset Inspections – Sonoma County

Consequence Level	Assets Inspected	Assets Requiring Inspection	Inspection Cycle
Extreme	-	-	Annual
Severe	-	-	Annual
High	14	-	Once Every 2 Years
Medium	576	-	Once Every 2 Years
Low	11,172	-	Once Every 3 Years
<b>Total</b>	11,762	-	

PG&E has not designated any electric distribution assets as located in extreme or severe consequence plat maps in Sonoma County. As such, the Monitor has determined that PG&E complied with the WMP commitment for electric distribution inspections based on its 2023 work plan. The Monitor plans to review PG&E’s electric distribution inspections for (i) 2024 for high consequence plat maps and (ii) 2025 for medium and low consequence plat maps to confirm compliance with the applicable inspection frequency commitments.

<sup>7</sup> WMP R4-1, pp. 480-484.



### Distribution Inspection Reviews

PG&E conducts inspections of overhead distribution assets to proactively identify corrective work on or imminent failures of equipment which could create fire ignition if left unresolved or allowed to “run to failure.” In addition to identifying incipient equipment issues which may result in an ignition, the inspections inform PG&E of new programmatic asset risk management responses or guidance clarifications. PG&E inspectors complete an inspection checklist and collect digital records and photo documentation regarding the condition of distribution assets during inspections.

The Monitor conducts quality assurance sampling reviews of PG&E overhead electric distribution asset inspections through field review sampling of asset inspections. The Monitor’s personnel review distribution assets by completing the same inspection questionnaire used by PG&E inspectors during the most recent inspection (the Monitor’s personnel do not review the PG&E inspector’s responses prior to conducting their own review). The Monitor then compares the questionnaire completed by its personnel against the most recent questionnaire completed by PG&E’s inspector to determine if any discrepancies exist between the Monitor’s responses and PG&E’s inspector’s responses. If the Monitor identified a discrepancy, it records the corresponding checklist responses and analyzes the underlying condition to determine whether it rises to the level of a Deficiency under the Judgment.

During the second year of the Monitorship, the Monitor conducted quality assurance reviews of PG&E inspections of 1,087 distribution assets in Sonoma County, which identified two Deficiencies. As of June 14, 2024, one was cured, and one was remediated in the ordinary course of PG&E’s inspection programs.<sup>8</sup>

The following graphics from the Monitor’s Dashboard show (i) the locations of the distribution assets reviewed during the second year of the Monitorship and Deficiencies identified in connection such reviews, and (ii) the locations of the distribution assets reviewed since the beginning of Monitorship and Deficiencies identified in connection such reviews.

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<sup>8</sup> Remediated in the ordinary course applies to a condition identified by PG&E and tagged/prescribed for work prior to receiving the corresponding Deficiency Notice from the Monitor. For these Deficiencies, the Monitor tracks the remediation of the underlying condition and then classifies the Deficiency as “Remediated in the Ordinary Course” rather than “Cured”. Remediated in the ordinary course is abbreviated herein as “ROC”.

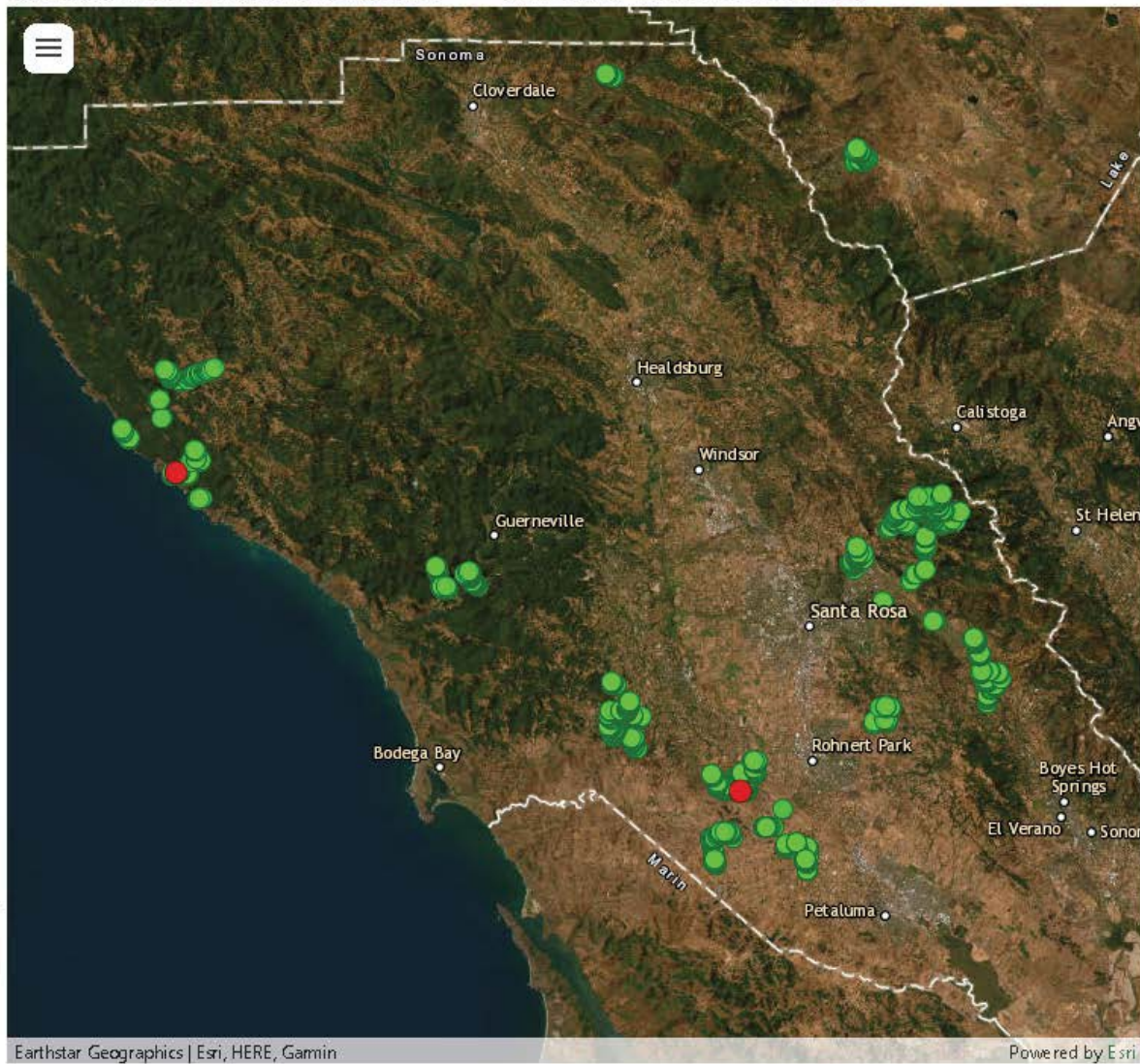




## Sonoma County - Distribution - Year 2

### PG&E Inspected Distribution Assets Reviewed by Monitor During Year 2 of the Monitorship

Inspection Review Locations Identified in **Green**, Deficiency Locations Identified in **Red**



**Total PG&E Inspected  
Distribution Assets  
Reviewed by Monitor**

**1087**

**Number of Distribution  
Assets Reviewed by  
Monitor with Deficiencies**

**2**

**Percentage of Monitor  
Reviewed Distribution  
Assets with Deficiency**

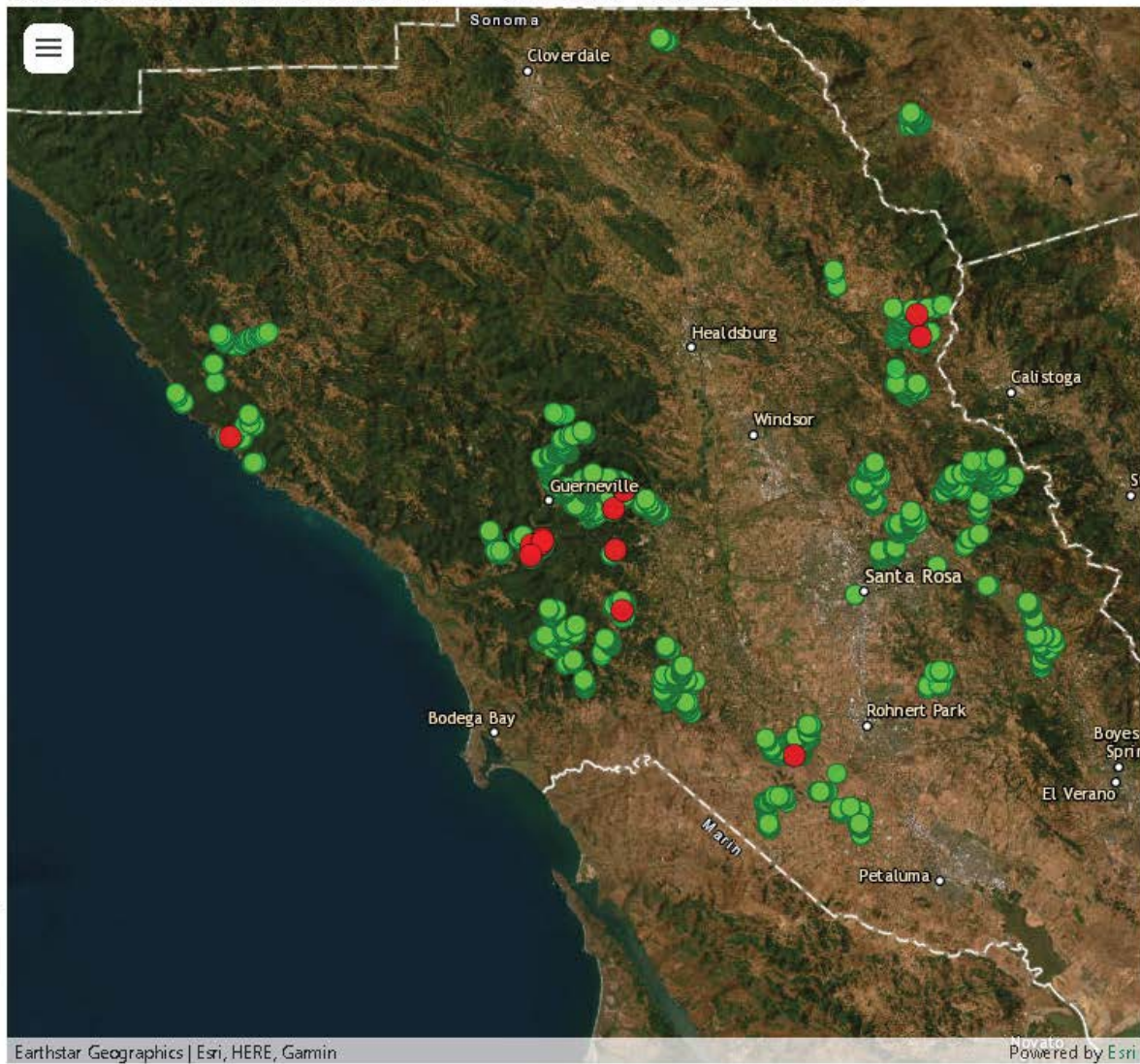
**0.18%**



## Sonoma County - Distribution - Cumulative

### PG&E Inspected Distribution Assets Reviewed by Monitor Since the Start of the Monitorship

Inspection Review Locations Identified in **Green**, Deficiency Locations Identified in **Red**



**Total PG&E Inspected  
Distribution Assets  
Reviewed by Monitor**

**2318**

**Number of Distribution  
Assets Reviewed by  
Monitor with Deficiencies**

**15**

**Percentage of Monitor  
Reviewed Distribution  
Assets with Deficiency**

**0.65%**





## Inspection Work Commitment (Vegetation Management Patrols)

### Judgment Commitment

PG&E shall conduct Vegetation Management Patrols<sup>9</sup> (and associated tree work and removals as identified and prioritized on the then-operative annual risk-informed work plans) on the distribution circuits in the HFTDs in Sonoma County, pursuant to the then-applicable WMP and annual work plans. Such inspections and associated work crews for each circuit are scheduled annually to allow for the allocation and scheduling of the required resources. Such annual plans for Sonoma County will be provided to the Sonoma County Safety Monitor for review and feedback, and the Sonoma County Safety Monitor will use these plans to help fulfill its monitoring duties set out in the Judgment.

### PG&E Internal Standards and Procedures Commitment

Routine VM inspections are required to be conducted annually on all overhead primary and secondary distribution facilities.<sup>10</sup> Tree mortality patrols are required to be conducted within HFTD once per year, approximately six months after routine patrol inspection of the circuit.<sup>11</sup>

### Commitments Analysis

The Monitor has determined that PG&E complied with the Judgment Commitment for Vegetation Management Patrols, as well as its Internal Standards and Procedures Commitment, for 2023 by conducting both routine VM and tree mortality patrols in HFTDs in Sonoma County during the 2023 work year.

### Vegetation Management Inspection Reviews

The “routine” electric distribution VM program performs annual inspections on all overhead primary and secondary distribution facilities to maintain radial clearance between vegetation and conductors by identifying trees that will encroach within the minimum distance requirements as required by law and/or PG&E procedures. In addition, vegetation that is dead, shows signs of disease, decay or ground or root disturbance, which may fall into or otherwise impact PG&E electric facilities before the next inspection cycle (“Hazard Trees”) are identified and mitigated. The VM tree mortality patrol program performs scheduled tree mortality patrols, also known as second patrols, approximately six months after the routine patrol on overhead primary and secondary distribution facilities, primarily within HFTD and HFRA, to maintain radial clearance between vegetation and conductors by identifying trees that will encroach within the minimum distance requirements required by law and/or PG&E procedures and by to identify Hazard Trees.

The Monitor conducts quality assurance reviews of PG&E VM inspections through field review sampling of PG&E’s VM inspection programs. The Monitor’s personnel review the vegetation

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<sup>9</sup> The primary routine vegetation management inspections and the tree mortality patrols for distribution circuits in HFTDs are hereafter referred to as “Vegetation Management Patrols”. Judgment, page 12.

<sup>10</sup> PG&E Utility Standard: TD-7102S Distribution Vegetation Management Standard, Publication Date: 04/20/2023, Effective Date: 06/20/2023, Rev: 2 (“DVMS”), page 2.

<sup>11</sup> DVMS, page 4.



conditions along electric overhead distribution lines in HFTD and HFRA and record vegetation conditions that may (i) encroach within minimum distance requirements as required by law and/or PG&E procedures for the applicable VM inspection program, or (ii) be deemed a Hazard Tree. The Monitor then analyzes the vegetation condition to determine whether it rises to the level of a Deficiency under the Judgment.

During the second year of the Monitorship, the Monitor conducted VM inspection reviews across approximately 214 miles in Sonoma County. These inspection reviews identified 131 Deficiencies.<sup>12</sup> As of June 14, 2024, one Deficiency was pending a cure proposal agreed upon between the Monitor and PG&E, two were pending cure, 75 were cured, and 53 were remediated in the ordinary course of PG&E's inspection programs.

The following graphics from the Monitor's Dashboard show (i) the starting locations of the VM inspection reviews during the second year of the Monitorship and Deficiencies identified in connection such reviews, and (ii) the starting locations of the VM inspection reviews since the beginning of Monitorship and Deficiencies identified in connection with such reviews.

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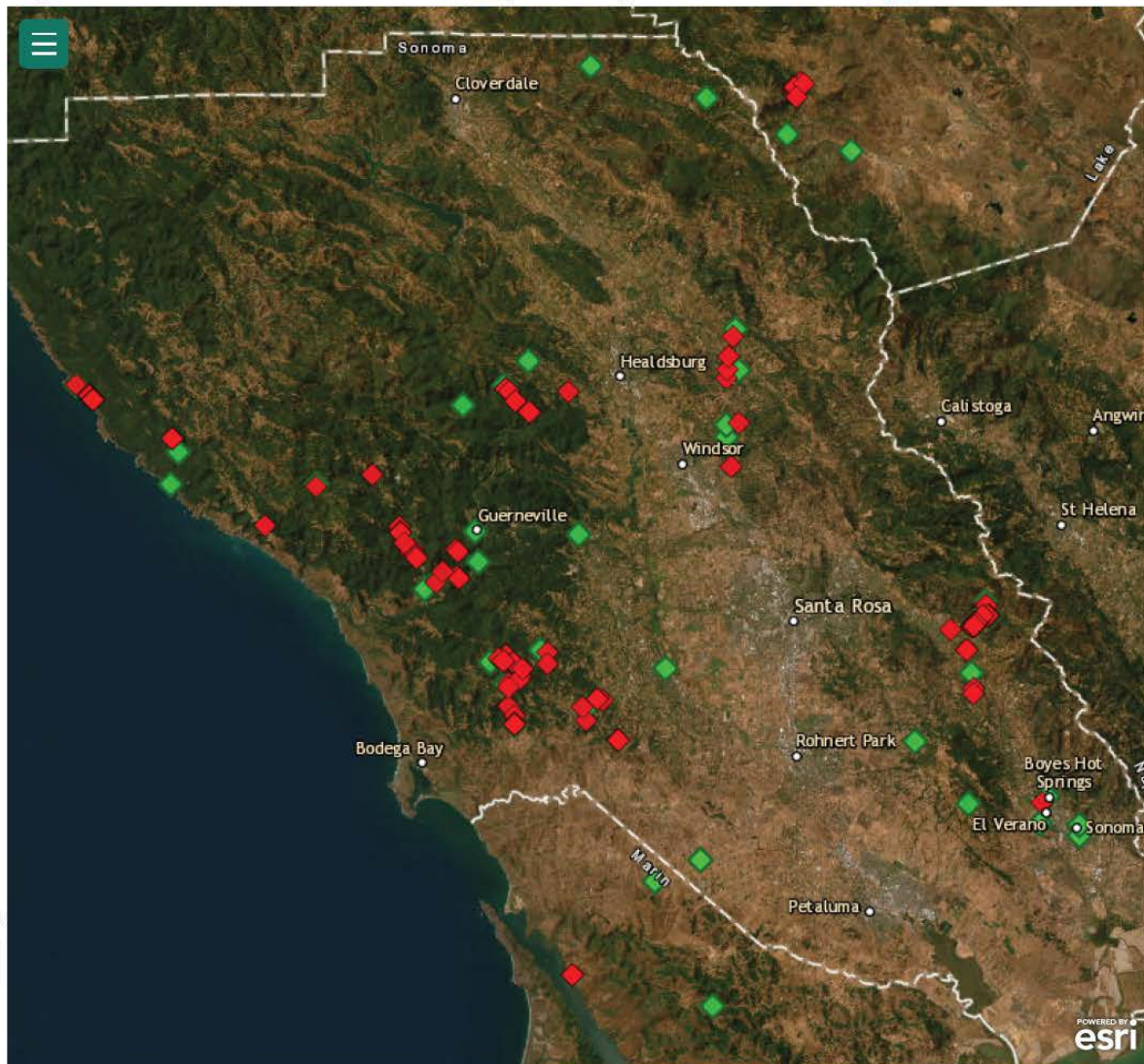
<sup>12</sup> Excludes three Deficiency Notices that were retracted by the Monitor following the meet and confer with PG&E.



## Sonoma County - VM - Year 2

PG&E VM Inspections Reviewed by Monitor Since the Start of the Monitorship

Inspection Review Locations Identified in **Green**, Deficiency Locations Identified in **Red**



**Total Circuit Miles of VM Inspections Reviewed by Monitor**

**214**

**Total Monitor Reviewed VM Assets with Deficiency**

**131**

**Miles Reviewed per Deficiency**

**1.6**

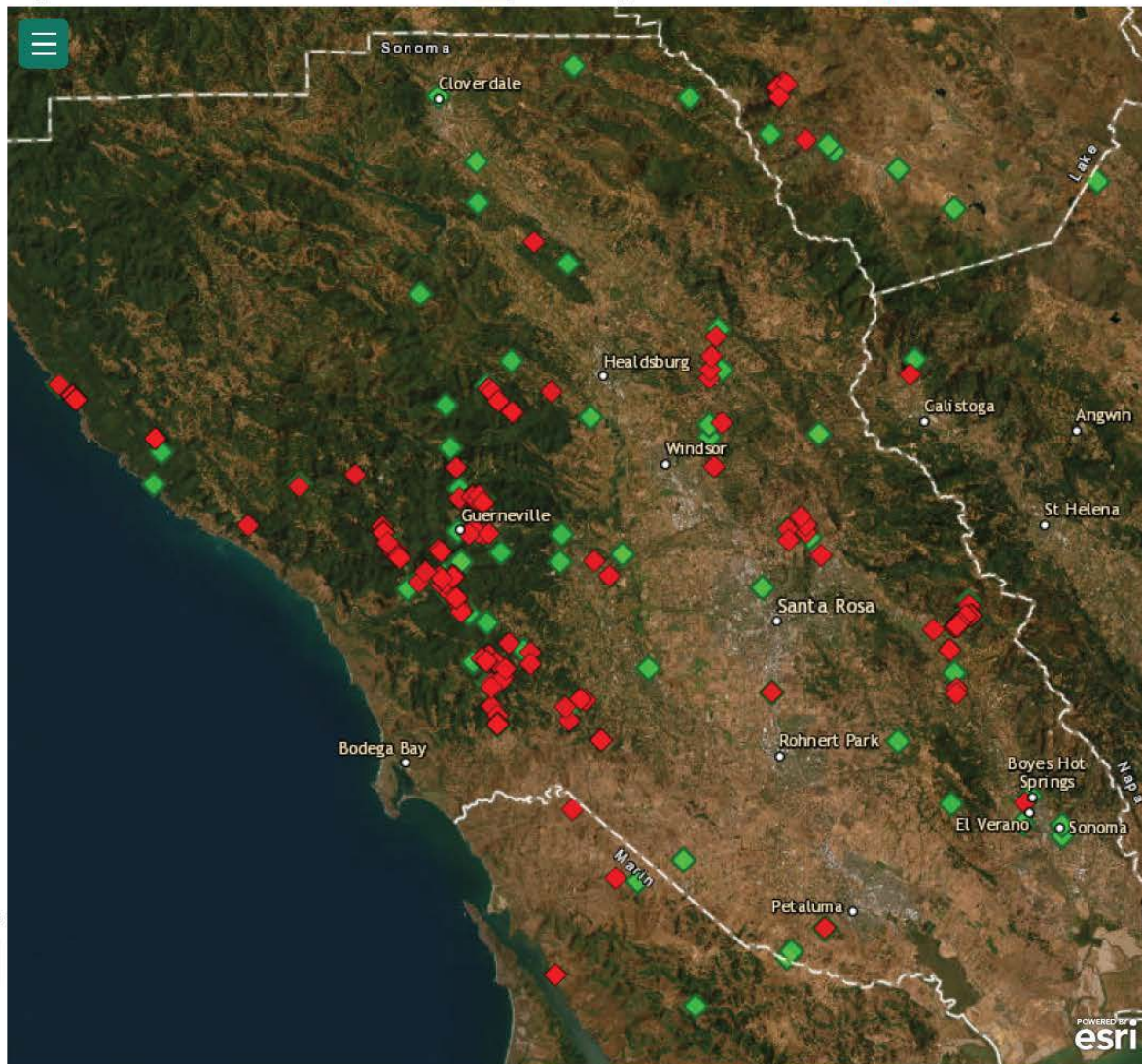




## Sonoma County - VM - Cumulative

PG&E VM Inspections Reviewed by Monitor Since the Start of the Monitorship

Inspection Review Locations Identified in **Green**, Deficiency Locations Identified in **Red**



**Total Circuit Miles of VM Inspections Reviewed by Monitor**

**421**

**Total Monitor Reviewed VM Assets with Deficiency**

**181**

**Miles Reviewed per Deficiency**

**2.3**



### Inspection Work Commitment (Enhanced Powerline Safety Settings)

As reported in the First Annual Compliance Report, Inspection Work Commitment (Enhanced Powerline Safety Settings) is complete. As such, the following Judgment Commitment and Commitment Analysis narrative for Inspection Work Commitment (Enhanced Powerline Safety Settings) is unchanged from the First Annual Compliance Report.

#### Judgment Commitment

PG&E shall implement its Enhanced Powerline Safety Settings (“EPSS”) program pursuant to the then-applicable WMP; for 2022, this includes implementing the EPSS program on all distribution circuits, approximately 1,470 miles, in Sonoma County HFTDs by the end of 2022. The Sonoma County Safety Monitor will inspect PG&E's implementation of this program pursuant to the then-applicable WMP.

#### Commitment Analysis

EPSS changes PG&E’s electrical equipment settings to reduce the potential for an ignition by automatically shutting off power within 1/10th of a second if an object (e.g., vegetation) comes into contact with a distribution line. PG&E implemented an EPSS pilot program in July 2021 on approximately 11,500 miles of distribution circuits in HFTD. From July 2021 through October 2021, PG&E reported a 40% reduction in ignitions as compared to the past three-year average; and an 80% reduction in the CPUC-reportable ignitions as compared to the past three-year average for the same period. Thereafter, PG&E decided to expand the EPSS program in 2022 to all distribution circuits in HFTD areas in their service territory, as well as select non-HFTD areas.<sup>13</sup>

PG&E reported to the Monitor that it has implemented EPSS on all HFTD distribution circuits in Sonoma County during 2022. Specifically, PG&E reported that it has implemented EPSS capability on all 1,461 HFTD distribution circuit miles, as well as an additional 801 miles of “EPSS Buffer Area” distribution circuits, for a total of 2,262 circuit miles in Sonoma County. These data are summarized in the table below.

Table 2. PG&E Miles of EPSS Enabled Assets – 2022 HFTD

Project	HFTD (Miles)	EPSS Buffer Area (Miles)	Total EPSS Capable Miles	Commitment Miles
Sonoma County	1,461	801	2,262	1,470

*Inspection Work Commitment (Enhanced Powerline Safety Settings) is complete.*

<sup>13</sup> These data are sourced from internal PG&E presentations, interviews, and data request responses provided to the Monitor.



## Inspection Work Commitment (Public Safety Power Shutoff)

### Judgment Commitment

PG&E proactively shuts off power when a potential high-risk wildfire event is forecasted under the Public Safety Power Shutoff (“PSPS”) program. When a PSPS is activated in Sonoma County, PG&E will notify the Sonoma County Safety Monitor and permit the Monitor to observe its implementation and follow up analysis of the event related to Sonoma County, provided that notwithstanding any other provision in this Judgment, PG&E’s decisions under and implementation of the PSPS program will not give rise to a Deficiency.

### Commitment Analysis

PSPS is a planned de-energization of circuits within a geographic area that is based on forecasted meteorological conditions and thresholds as set forth in PG&E’s PSPS protocols. PSPS and EPSS are unrelated operationally and are different in terms of the manner in which they are executed. PSPS and EPSS are complementary wildfire mitigation programs that reduce the risk of wildfire ignition while increasing the likelihood of customers experiencing diminished reliability.

PG&E did not initiate any PSPS events in Sonoma County during the second year of the Monitorship.





## MONITORSHIP YEAR 2: DEFICIENCIES AND STATUS

The Monitor issued a total of 137 Deficiency Notices for conditions identified during the second year of the Monitorship from April 11, 2023 to April 10, 2024. As of June 14, 2024, the cure status for Deficiency Notices issued for inspection reviews conducted during the second year of the Monitorship was as follows:

- Cure Proposal Pending: 2
- Pending Cure: 2
- Cured: 76
- Remediated in the Ordinary Course: 54
- Retracted: 3

The Monitor has issued a total of 210 Deficiency Notices for conditions identified during inspection reviews conducted during the course of the Monitorship from the Effective Date through April 10, 2024. As of June 14, 2024, the cure status for Deficiency Notices issued for inspection reviews conducted from the Effective Date through April 10, 2024, listed on Appendix A, was as follows:

- Cure Proposal Pending: 2
- Pending Cure: 2
- Cured: 130
- Remediated in the Ordinary Course: 64
- Retracted: 12

To date, PG&E has complied with all deadlines relating to the Deficiency meet and confer, cure proposal, and cure processes.



## MONITORSHIP YEAR 2: CONSIDERATIONS

The following is a summary of considerations identified in connection with the second year of the Monitorship. Per the Judgment, the scope of the Monitor's role is to monitor PG&E's compliance with the Performance Commitments and the Inspection Work Commitments. In so doing, the Monitor is permitted to discuss with PG&E and the Sonoma County D.A. any related issues during the course of the Monitorship. While the Monitor's role is not to provide recommendations to PG&E regarding such issues, the Monitor presents the following considerations.

### Immediate Hazards

While not stipulated in the Judgment, in the interest of public safety, the Monitor may report to PG&E any observed VM or infrastructure condition that poses an imminent wildfire risk and therefore merits immediate attention from PG&E (each, an "Immediate Hazard"). During the second year of the Monitorship, the Monitor identified and notified PG&E of four Immediate Hazards, which are described as follows: two related to uprooting trees; one related to a broken branch hanging above a primary conductor; and one related to vegetation in contact with the primary conductor. All Immediate Hazards reported to PG&E were promptly mitigated. The two Immediate Hazards related to uprooting trees were determined to be Deficiencies under the Judgment.

### Electric Distribution Checklist Discrepancies

In connection with quality assurance sampling of PG&E electric distribution asset inspections during the second year of the Monitorship, the Monitor reviewed the 2023 PG&E inspections for 384 electric distribution assets in Sonoma County.<sup>14</sup> Of the 384 distribution assets reviewed using PG&E's 2023 inspection checklist, approximately 22% had at least one inspection checklist question for which the Monitor's personnel identified a condition that was not identified by PG&E's inspector. The distribution checklist questions with the highest discrepancy rate between PG&E's and the Monitor's responses were: (i) 21% - Conductor: Does the primary covered conductor ("tree wire") have exposed, energized sections (such as rotated Kaddas covers, splices, connectors, flying bells) that are not covered or jacket has visible damages or signs of tracking; (ii) 12% - Other Required Data: Non-exempt equipment present at the inspection location: Universal or Open Link Fuse; and (iii) 11% - Hardware Framing: Insulators or king pin chipped, cracked, corroded, contaminated, flashed, has signs of tracking, broken or damaged. These checklist discrepancies did not rise to the level of a Deficiency under the Judgment and are presented for PG&E's consideration only.

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<sup>14</sup> During early 2023, the Monitor reviewed numerous electric distribution assets that were last inspected by PG&E using their 2022 distribution checklist, which are not included in this consideration that focuses on the 2023 distribution checklist.



## Monitor Dashboard

In addition to regular weekly meetings with PG&E and bi-weekly meetings with the Sonoma County D.A., the Monitor has continued to maintain the Monitor Dashboard for Sonoma County. Now in its third version, this tool displays regularly updated information about inspection reviews for transmission, distribution, and vegetation management inspections, as well as Deficiency locations, types, cure status, and links to the Deficiency Notices. PG&E has indicated that it is using information from the Dashboard to inform process improvement efforts and benchmark the Monitor's findings against internal quality control and quality assurance information.

## PG&E Operational Learnings Team

PG&E's "Operational Learnings Team" ("OLT") provided presentations at the First Annual Meeting held on July 20, 2023, and Second Six-Month Meeting held November 14, 2023. These presentations covered PG&E's efforts to review and integrate the Monitor's findings into its business practices, including statistical analysis of Deficiencies identified by the Monitor. PG&E has indicated that the OLT will continue to use information generated by the Monitor in identifying potential trends and reviewing data relating to teams, contractors, trees, third-party impacts, and other data points. PG&E has indicated to the Monitor that the OLT intends to present findings at each Annual Meeting and Six-Month Meeting for the duration of the Monitorship.

## Monitor Site Visit to PG&E External Engagement Command Centers

The Monitor visited PG&E's External Engagement Command Centers on March 26, 2024, at PG&E's Oakland office, with the objective of observing how PG&E integrates its learnings from the Monitor's findings into regular business practices. PG&E's External Engagements Monthly Operating Review takes place on a monthly cadence in a dedicated space where all information is posted for communal review. In general, the goal of the monthly meeting is to walk-through PG&E's efforts to track Deficiencies and improve outcomes related to specific findings. Certain items, including the tracking of Deficiencies related to electric transmission and distribution assets, were still "in development" at the time of the Monitor's visit; others, like the tracking and monitoring of Deficiencies related to VM, were more robust.

The Monitor also observed the Wildfire Risk Weekly Operating Review. PG&E uses this weekly meeting to inform management across the organization about progress toward specific goals, including the completion of WMP targets, EPSS implementation, ignitions across the service territories, and other wildfire-related situational awareness metrics. The Wildfire Risk Weekly Operating Review meetings also serve as an opportunity for individuals and business units to seek input and additional information from colleagues as they push toward those goals.



## PG&E's 2023-2025 WMP

PG&E's 2023-2025 WMP, the utility's first under the new WMP Process and Evaluation Guidelines issued by the OEIS mandating plans lasting for a period of three years, was approved on December 29, 2023. Previously, each WMP only covered one year. Under the OEIS' new WMP guidelines, PG&E will operate under this new WMP through the end of 2025, at which point the forthcoming 2026-2028 WMP would then take effect. Given the longer duration of this regulatory document, the OEIS requires investor-owned utilities to submit a "2025 WMP Update" outlining any material operational changes sought in the final year of the 2023-2025 WMP based on learnings or outcomes from the first two years of implementing the WMP. PG&E submitted its 2025 WMP Update on April 2, 2024.

On January 8, 2024, PG&E submitted a Change Order to its 2023-2025 WMP. The Change Order mechanism is described in the 2023-2025 WMP Process and Evaluation Guidelines and stipulates that a utility "may seek to change approved mitigation initiatives as it gains experience and assesses outcomes." The 19 changes requested by PG&E fall broadly into two categories. First, PG&E sought to update plans and goals to reflect the final decision of the CPUC regarding PG&E's 2023 General Rate Case approved by the CPUC on November 16, 2023 (the "GRC"). Second, PG&E requested a set of changes to inspection protocols and procedures. These requested changes related to inspection protocols and procedures include a significant increase in the use of aerial drone inspections for its distribution assets. This change is discussed in detail in a later consideration.

PG&E received approval for 11 of its 19 requests on May 31, 2024. These approved requests include both the GRC and aerial drone inspection protocol changes. On June 7, 2024, PG&E submitted an updated version of its WMP to reflect the approved changes (i.e., the 2023-2024 Wildfire Mitigation Plan R4-1).

## OneVM

Over the course of 2023, PG&E has implemented a new system for managing its VM programs called OneVM. The OneVM platform is an in-house tool that will serve as a single point of reference for all VM work taking place within PG&E's service territory, including both inspections and prescribed work. The platform uses a combination of multiple products, including Salesforce database products, ESRI mapping products, and Locana application products. PG&E's intent is to use these products together to manage VM data in a way that allows for users in the field to have access to geospatially explicit information from across multiple inspection programs in a single source.

OneVM is a marked departure from the previous approach to managing VM data. For example, in the case of routine and second patrol distribution VM inspections, tabular data regarding individual hazard trees was historically recorded in the Vegetation Management Database ("VMD"), while information about the completion of inspections was historically recorded on paper maps and housed at the local level before being added to a different tabular database



accounting for inspection completion at the organizational level. OneVM enables a much more streamlined and searchable approach to managing a large volume of data over a large area and across multiple years.

As of March 15, 2023, any new VM projects started in routine and second patrol VM inspections were executed in the OneVM platform. Any projects started prior to that date were completed in legacy programs. Over the course of this past year, the Monitor has tracked both legacy programs and the new OneVM platform in order to assess potential VM Deficiencies. The Monitor has attended OneVM Weekly Operating Reviews and has a standing monthly meeting during which questions and concerns about the program are shared with PG&E. Over the course of Year 3, the Monitor intends to observe the first full year of projects initiated and completed on the OneVM platform and will continue to assess the program's effectiveness.

### Major Woody Stem Management

General Order 95 Rule 35 and California Resources Code Section ("PRC") 4293 establish the four-foot minimum radial clearance ("MRC") requirements between vegetation and primary voltage distribution conductor in local and state responsibility areas, respectively. Both regulations contain exemptions from the four-foot MRC requirements for certain mature trees whose trunk and major limbs are located more than six inches from the primary distribution conductor. PG&E classifies these trees as "Major Woody Stems" ("MWS") pursuant to its Vegetation Management Distribution Inspection Procedure, Attachment 3, Identifying Major Woody Stems, which specifies the various criteria that a tree must satisfy to be qualified as a MWS. An ISA Certified Arborist with 18 months of experience in utility arboriculture or who possesses the Utility Specialist Certification, or a Registered Professional Forester, must make the initial determination that a tree qualifies as a MWS, after which the WMS qualification is entered into PG&E's system of record. Additionally, PRC 4293 requires that utilities with primary distribution conductor in state responsibility areas inspect each MWS tree annually, maintain a database with certain identifying information, and report such information annually to CAL FIRE by July 1 of each year for the previous calendar year (the "CAL FIRE MWS List").

The Monitor has issued various Deficiency Notices for violations of the four-foot MRC requirement for trees that did not appear as a MWS in OneVM, which is PG&E's current system of record for MWS. During the meet and confer process with respect to such Deficiencies, PG&E at times provided documentation indicating that the tree was designated as a MWS despite not appearing in OneVM. The Monitor also requested evidence that a designated MWS was included in the CAL FIRE MWS List, and in certain instances the tree characteristics and/or coordinates for the MWS entry differed significantly from those observed by the Monitor.

The Monitor has held various meetings with members of PG&E's VM and OneVM implementation teams to learn more about the MWS designation, recordation, OneVM visibility, and CAL FIRE MWS List preparation processes. PG&E has acknowledged various



challenges with respect to data quality for MWS entries. For instance, the MWS system of record prior to OneVM was the VMD. Due to architectural differences between the VMD and OneVM, the migration of certain MWS data from the VMD did not map cleanly to OneVM. Additionally, PG&E field inspectors began exclusively using IOS field devices in March 2023, which record significantly more accurate GPS readings than the field devices previously used to capture MWS coordinates, which may account for the significant variances between the Monitor's tree coordinates and certain legacy MWS entries in the CAL FIRE MWS List. Despite these data quality challenges for historical MWS records, PG&E believes that new MWS data entered directly in OneVM is accurately recorded and visible using current field applications.

### Distribution Drone Inspections

As noted previously, the OEIS has approved an expansion of PG&E's Distribution Aerial Inspection Program. This change comes as the result of a pilot program undertaken by PG&E in 2023, the results of which indicated that a significantly greater number of conditions were identifiable using a drone as compared to ground inspections. According to PG&E, "Roughly 900 B tags were found on these structures of which 84% were identified using aerial inspections. Ground inspections of the same structures identified only 34% of these conditions." As PG&E expands its use of drone-based aerial inspections of distribution assets in HFTDs, the company has indicated that it will continue to complete detailed ground inspections pursuant to its compliance with General Order 165 of all distribution at least once every five years.

The Monitor understands PG&E's program as an effort to take advantage of advanced drone technology to improve inspection methods and increase the frequency with which problematic conditions are identified from inspections. During Year 3 of the Monitorship, the Monitor intends to observe the full distribution inspection cycle, inclusive of both aerial drone inspections and ground inspection reviews.

### Quality Management

Quality Management at PG&E assesses both electric transmission and distribution asset inspections, as well as VM inspections. The program falls into two categories: Quality Control ("QC") and Quality Assurance ("QA"). The QC process seeks to ensure that inspections and identified work meet compliance standards and has a goal to inspect 100% of all HFTD assets on which work was completed.<sup>15</sup> The QA process is more targeted, seeking to assess a statistically valid sample of PG&E's work and provide feedback to operational teams on all aspects of a given program, including training, reporting, execution, quality control, and asset strategy.

The Monitor has had several meetings with members of the Quality Management team and

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<sup>15</sup> The goal to inspect 100% of HFTD assets began in 2024.





will continue to assess the program over the course of Year 3 of the Monitorship.

### Additional VM Programs in 2023

In addition to the FTI program discussed earlier in this report, PG&E conducted the Tree Removal Inventory program and Vegetation Management Operational Mitigation program in 2023.

At the conclusion of the EVM program at the end of 2022, PG&E had 385,428 trees identified for removal across its service territory during the program that had not been remediated. PG&E indicated that these trees will be reassessed pursuant to their Tree Removal Inventory (“TRI”) program, which is conducted by an ISA TRAQ qualified Vegetation Management Inspector (“VMI”), and that a significant number of trees may not require removal upon re-inspection if deemed healthy. Of those trees that will be confirmed for removal, PG&E projects that it will remove such trees over a five-year period at an incremental pace. Under the TRI program, PG&E targets the removal of 15,000 trees in 2023, 20,000 trees in 2024, 25,000 trees in 2025, 25,000 trees in 2026, and 25,000 trees in 2027, resulting in an approximate 55% risk drawdown following removal of the aggregate 110,000 trees during that five-year period. PG&E reports having surpassed its 2023 target by removing 35,760 trees under the TRI program through tree work completed, trees already removed through another PG&E VM program, and trees removed from the inventory because the PG&E facilities have been removed/moved and the tree no longer poses a threat to electric facilities. PG&E has also determined that any TRI trees with a legacy Tree Assessment Tool designation of “Abate” will be removed regardless of the condition of the tree or proximity to PG&E facilities. Any tree in the TRI that remained in the TRI with any designation other than “Abate” will be re-inspected by an ISA TRAQ qualified VMI.

The Vegetation Management Operational Mitigation (“VMOM”) program involves proactive and reactive management of vegetation around EPSS-capable electric facilities to mitigate potential wildfire risks and reliability issues. Proactive VMOM inspections target portions of the grid that experienced a higher rate of historical EPSS outages. Reactive VMOM inspections are initiated following vegetation-related outages on EPSS-enabled circuits. Inspections include a review of relevant outage and vegetation management data prior to field activities. Across its service territory in 2023, PG&E (i) conducted proactive VMOM inspections of 246 miles of distribution circuit and prescribed work for 2,583 trees, and (ii) prescribed work for 2,741 trees in connection with reactive VMOM inspections. PG&E indicates that it is still developing its VMOM inspection process as more EPSS outage data becomes available.

### Constraints Process

During the first year of the Monitorship, the Monitor’s personnel reported a significant number of VM conditions resulting in Deficiencies for which the identified tree was listed as having “Hold” or “Refusal” status in PG&E’s VM record associated with the tree, but the



Monitor did not have visibility into the reason for the status or PG&E's efforts to resolve the issue. "Hold" or "Refusal" status indicates that a PG&E inspector identified and prescribed tree work prior to the Monitor's inspection review but the prescribed tree work has been delayed for a specific reason. "Hold" status may be associated with a location-based permitting process involving a third-party or may be the result of PG&E internal processes, such as environmental review. "Refusal" status generally involves the property owner having objected to the tree work prescribed by PG&E. During the second year of the Monitorship, the Monitor generally did not submit "Refusal"/ "Hold" trees as Deficiencies absent extenuating circumstances and instead tracked their resolution internally.

As PG&E implements its OneVM data management platform into wider use, "Hold" and "Refusal" trees are being managed more holistically as "Constraints." The Monitor has met multiple times with PG&E's centralized Constraints Management Team ("CMT"), which supports local offices to expedite resolution of constrained vegetation management work on properties where the landowner or customer may require permitting or additional engagement, or where regulations or internal guidelines require that PG&E conduct an internal review prior to completing the work. PG&E indicates that local offices voluntarily seek the assistance of the CMT but are not currently required to do so. Regardless of whether the CMT is engaged for assistance, PG&E local offices that experience customer/property owner interference with property access or prescribed tree work must follow the Vegetation Management Distribution Interference Procedure (the "Interference Procedure"), which provides step-by-step instructions to be followed by VM Operations to resolve the constraint. According to PG&E, the Interference Procedure does not provide a firm timeline for resolution of customer interference constraints due to the fact-specific nature of individual constraint situations. However, customer interference constraints that have exhausted the steps in the procedure may result in electric service disconnection or forced pruning.

For constraints involving permitting with agency managed lands, PG&E does not have a specific internal procedure but instead follows the applicable permitting application process, often batching multiple constraints within a single application. While PG&E does not have a firm timeline for resolution of constraints on agency managed land, PG&E has internal resolution targets that vary depending on the agency.

The Monitor will continue to assess processes and procedures associated with the management of constrained trees during the third year of the Monitorship.

### Tree Attachments

Over the course of the second year of the Monitorship, the issue of "Tree Attachments" has come up several times in different contexts. A "Tree Attachment" is defined as an instance when, for various reasons, a crossarm with electric distribution infrastructure is attached to a living tree instead of installing a pole. PG&E acknowledges that this practice is no longer an appropriate method for providing electricity to customers and has discontinued the installation of Tree Attachments for primary and secondary distribution service.





The Monitor was first made aware of PG&E's management of Tree Attachments early in Year 2. In the First Annual Compliance Report, the Monitor noted that the data provided by PG&E were insufficient to corroborate the completion of 2022 WMP distribution inspection commitments. During the 30-day review period after the issuance of the First Annual Compliance Report, the Monitor identified 68 distribution assets in Tier 2 and Tier 3 HFTD areas across Sonoma and the North State Counties that did not receive required inspections in 2023. The Monitor also learned from PG&E that 27 of these assets were Tree Attachments that did not appear in PG&E's distribution asset inventory and therefore were not receiving regular distribution inspections.

While the tracking of Tree Attachments is not a compliance driven activity, PG&E has managed an inventory of known Tree Attachments since 2021. While PG&E has not actively searched for unknown Tree Attachments in its service territory, processes exist for these assets to be added to the inventory when identified during regular inspections. PG&E has indicated to the Monitor that 16,229 Tree Attachments have been identified across its service territory, and that it intends to identify the entire population of Tree Attachments by 2027.

The Monitor has met on several occasions with members of the VM, Systems Inspections ("SI"), and Maintenance & Construction ("M&C") teams at PG&E in order to better understand the processes and procedures associated with addressing the unique issues that arise around Tree Attachments. Issues with regard to these assets may be called in by either SI or VM teams, depending on the issue at hand. For example, if a VMI identifies an issue with the tree, that condition could be called in by a VMI conducting either routine or second patrol inspections. If it is possible to perform work on the tree without encroaching on the minimum approach distance to the conductor, the appropriate work can take place without coordination with M&C. If, however, the tree needs to be removed because it is dead, then VM must coordinate with M&C to facilitate safe operations. Regardless of which organization identifies an issue with the Tree Attachment, the tag with the tighter timeline takes precedence (e.g., if SI has identified a B Tag and VM has issued a P1, the P1 takes precedence). The Monitor will continue to assess PG&E's management of Tree Attachments in Year 3 of the Monitorship.

### Data Request Process Improvements

In the First Annual Compliance Report, the Monitor noted various challenges in connection with PG&E's responses to the Monitor's data requests, both in terms of timeliness and quality. Following the First Annual Meeting, the Monitor and PG&E initiated a regular weekly meeting to discuss outstanding data requests. These meetings and other conversations with PG&E personnel have improved the Monitor's understanding of the structure of PG&E's data management architecture and data request review and response processes. PG&E has also hired an additional analyst to support the management of data requests.

The Monitor observes that certain challenges remain, particularly with respect to data requested within county boundaries where PG&E's historical recordkeeping has not tracked county location. However, in the second year of the Monitorship, PG&E has improved its ability



to provide data based on county location, and certain new recordkeeping systems will be easier to search by county location (e.g. OneVM). The Monitor has also adopted the habit of requesting a discussion with the relevant PG&E stakeholders tasked with responding to a particular data request prior to their preparation of the response so that the Monitor may answer any questions and promote alignment and efficiency. While responses to certain of the Monitor's data requests to assess PG&E's compliance with its Inspection Work Commitments for the second year of the Monitorship required multiple iterations, the data request process has improved markedly from the first year of the Monitorship, and the Monitor will continue to work with PG&E on further improvement over the course of the Monitorship.

### Transmission Aerial Drone Inspection Demonstration

During the Second Six-Month Meeting held in Santa Rosa, CA on November 14, 2023, among the Sonoma D.A., PG&E, and the Monitor, representatives of the Sonoma D.A.'s office inquired as to whether aerial drone inspections of electric transmission assets are commensurate with climbing inspections in terms of their ability to identify conditions in need of repair or replacement. PG&E representatives expressed their belief that aerial inspections of electric transmission assets are as good or better than climbing inspections largely due to the significant advancements in drone technology and camera resolution quality over recent years. The PG&E representatives offered to host a transmission drone demo to allow the Sonoma D.A. and the Monitor to observe the capabilities and inspection processes for transmission drones currently in use for certain PG&E transmission asset inspections.<sup>16</sup>

On March 25, 2024, PG&E hosted an aerial drone inspection demo at its Lakeville Substation in Petaluma, CA that was attended by Sonoma D.A. representatives, Monitor team members, contractors from Cyberhawk, and numerous PG&E employees. Following introductory remarks, the group went outside to a nearby transmission tower for a live drone demo. PG&E's drone aerial inspections are predominantly conducted by contractors, such as Cyberhawk, who operate the drone for the inspection. A two-member team of Cyberhawk operators conducted the demo using a P50 drone, which is the model primarily used for PG&E aerial drone transmission inspections at this time. P50 drones have advanced technology with six collision avoidance sensors, a 100 MP camera, and GPS capability. One of the Cyberhawk contractors acted as the pilot flying the drone through a series of pre-determined locations around the tower, while the other contractor operated the camera. While the weather on the day of the demo was fair, PG&E noted that the ability to conduct drone flights is subject to certain wind, visibility, moisture, and airspace restrictions.

Following the transmission drone demo, PG&E directed the Cyberhawk contractors to provide a brief demo of a distribution drone inspection on an adjacent distribution structure using a Mavic 3 Enterprise drone, which is considerably smaller than the P50, has two stacked 24 MP cameras, and only requires one operator.

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<sup>16</sup> PG&E noted that certain transmission inspections, such as guy tension testing for 500kV structures, cannot be completed via drone and require climbing inspections.



Following the drone demos, the group returned to the meeting room to observe the transmission desktop photo review process conducted by PG&E employees in a remote, “controlled environment”, generally within a few days of the drone inspection. If the initial inspector identifies an abnormal finding, then the inspector’s finding will be subsequently reviewed by an “Inspection Review Specialist”. If the Inspection Review Specialist concurs with the finding, the Centralized Inspection Review Team (“CIRT”) will review and prioritize the finding in connection with issuing a work tag, or the CIRT can override the initial finding. PG&E’s employee conducting the desktop photo review demo then displayed side by side pictures of the same transmission asset taken from drone inspections in 2019 and 2024. The photo resolution in the 2024 picture was very detailed and far surpassed the resolution quality of the 2019 photo.

The Sonoma D.A. representatives and the Monitor asked questions and received PG&E’s responses throughout the drone and desktop review demos. While it is beyond the Monitor’s scope under the Judgment to opine as to the superiority of aerial drone inspections versus climbing inspections, the Monitor was appreciative of the demos and impressed with the quality and breadth of the images captured during 2024 aerial transmission inspections.



APPENDIX A: MONITORSHIP DEFICIENCIES THROUGH YEAR 2

Sonoma County Deficiency Tracker – As of 6/14/2024

<u>Deficiency #</u>	<u>County</u>	<u>Work Commitment</u>	<u>Type</u>	<u>Notice Date</u>	<u>Cure Deadline</u>	<u>Status</u>
Sonoma 1	Sonoma	Vegetation Management Patrols	Overhang	9/28/22	N/A	ROC
Sonoma 2	Sonoma	Vegetation Management Patrols	Radial Clearance	9/28/22	N/A	Retracted
Sonoma 3	Sonoma	Vegetation Management Patrols	Radial Clearance	9/28/22	N/A	Retracted
Sonoma 4	Sonoma	Vegetation Management Patrols	Radial Clearance	9/28/22	12/12/2022	Cured
Sonoma 5	Sonoma	Vegetation Management Patrols	Radial Clearance	9/28/22	N/A	Retracted
Sonoma 6	Lake	Vegetation Management Patrols	Hazard Tree	10/31/2022	2/28/2023	ROC
Sonoma 7	Sonoma	Vegetation Management Patrols	Radial Clearance	10/31/2022	N/A	Retracted
Sonoma 8	Sonoma	Electric Distribution Assets	Guy Wire Stain	11/11/2022	3/31/2023	Cured
Sonoma 9	Sonoma	Electric Distribution Assets	Open Wire Secondary	11/11/2022	3/31/2023	Cured
Sonoma 10	Sonoma	Vegetation Management Patrols	Hazard Tree	11/11/2022	N/A	Retracted
Sonoma 11	Sonoma	Vegetation Management Patrols	Hazard Tree	12/14/2022	3/6/2023	Cured
Sonoma 12	Sonoma	Vegetation Management Patrols	Hazard Tree	12/14/2022	4/6/2023	Cured
Sonoma 13	Sonoma	Vegetation Management Patrols	Hazard Tree	12/14/2022	N/A	Retracted
Sonoma 14	Sonoma	Vegetation Management Patrols	Hazard Tree	12/14/2022	3/20/2023	Cured
Sonoma 15	Sonoma	Vegetation Management Patrols	Hazard Tree	12/14/2022	3/6/2023	Cured
Sonoma 16	Sonoma	Vegetation Management Patrols	Hazard Tree	12/14/2022	3/6/2023	Cured
Sonoma 17	Sonoma	Vegetation Management Patrols	Hazard Tree	12/14/2022	3/6/2023	Cured
Sonoma 18	Sonoma	Vegetation Management Patrols	Radial Clearance	12/14/2022	3/6/2023	Cured
Sonoma 19	Sonoma	Vegetation Management Patrols	Radial Clearance	12/14/2022	3/6/2023	Cured
Sonoma 20	Sonoma	Electric Distribution Assets	Asset Maintenance	2/1/2023	6/1/2023	Cured
Sonoma 21	Sonoma	Vegetation Management Patrols	Hazard Tree	2/1/2023	5/31/2023	Cured
Sonoma 22	Sonoma	Vegetation Management Patrols	Hazard Tree	2/1/2023	4/16/2023	Cured
Sonoma 23	Sonoma	Vegetation Management Patrols	Radial Clearance	2/1/2023	N/A	Cured
Sonoma 24	Sonoma	Electric Distribution Assets	Strain or Abrasion	2/17/2023	7/7/2023	Cured
Sonoma 25	Sonoma	Electric Distribution Assets	Asset Maintenance	2/17/2023	N/A	Retracted
Sonoma 26	Sonoma	Vegetation Management Patrols	Radial Clearance	2/17/2023	5/15/2023	Cured
Sonoma 27	Sonoma	Vegetation Management Patrols	Hazard Tree	2/17/2023	5/15/2023	Cured
Sonoma 28	Sonoma	Vegetation Management Patrols	Hazard Tree	2/17/2023	5/15/2023	Cured
Sonoma 29	Sonoma	Electric Distribution Assets	Pole Clearing	3/3/2023	N/A	Retracted
Sonoma 30	Napa	Electric Distribution Assets	Asset Maintenance	3/3/2023	12/31/2023	ROC
Sonoma 31	Napa	Electric Distribution Assets	Asset Maintenance	3/3/2023	7/9/2023	ROC
Sonoma 32	Sonoma	Vegetation Management Patrols	Hazard Tree	3/3/2023	5/18/2023	Cured
Sonoma 33	Sonoma	Vegetation Management Patrols	Hazard Tree	3/3/2023	5/18/2023	Cured
Sonoma 34	Sonoma	Electric Distribution Assets	Pole Clearing	3/24/2024	3/30/2023	ROC
Sonoma 35	Sonoma	Electric Distribution Assets	Pole Clearing	3/24/2024	3/30/2023	ROC
Sonoma 36	Sonoma	Electric Distribution Assets	Pole Clearing	3/24/2024	N/A	Cured
Sonoma 37	Sonoma	Electric Distribution Assets	Asset Maintenance	3/24/2024	10/31/2023	Cured
Sonoma 38	Sonoma	Electric Distribution Assets	Asset Maintenance	3/24/2024	N/A	ROC
Sonoma 39	Sonoma	Vegetation Management Patrols	Radial Clearance	3/24/2024	6/8/2023	Cured
Sonoma 40	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/8/2023	Cured
Sonoma 41	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	N/A	Retracted
Sonoma 42	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/8/2023	ROC
Sonoma 43	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/10/2023	Cured
Sonoma 44	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/8/2023	Cured
Sonoma 45	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/8/2023	Cured
Sonoma 46	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	12/29/2023	ROC
Sonoma 47	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/8/2023	Cured
Sonoma 48	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/8/2023	Cured
Sonoma 49	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/8/2023	Cured
Sonoma 50	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/8/2023	Cured
Sonoma 51	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/8/2023	Cured
Sonoma 52	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/8/2023	Cured
Sonoma 53	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/19/2023	Cured
Sonoma 54	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/8/2023	Cured
Sonoma 55	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	N/A	Cured
Sonoma 56	Sonoma	Vegetation Management Patrols	Radial Clearance	3/24/2024	10/15/2023	Cured
Sonoma 57	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/8/2023	ROC
Sonoma 58	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/9/2023	Cured
Sonoma 59	Sonoma	Vegetation Management Patrols	Hazard Tree	3/24/2024	6/10/2023	Cured
Sonoma 60	Sonoma	Electric Distribution Assets	Pole Clearing	4/14/2023	6/31/2023	Cured
Sonoma 61	Sonoma	Electric Distribution Assets	Pole Clearing	4/14/2023	6/31/2023	Cured
Sonoma 62	Sonoma	Vegetation Management Patrols	Radial Clearance	4/14/2023	6/31/2023	Cured
Sonoma 63	Sonoma	Vegetation Management Patrols	Radial Clearance	5/8/2023	7/21/2023	Cured
Sonoma 64	Sonoma	Vegetation Management Patrols	Radial Clearance	5/8/2023	7/21/2023	Cured
Sonoma 65	Sonoma	Vegetation Management Patrols	Radial Clearance	5/8/2023	7/21/2023	Cured
Sonoma 66	Sonoma	Vegetation Management Patrols	Radial Clearance	5/8/2023	7/21/2023	Cured
Sonoma 67	Sonoma	Vegetation Management Patrols	Radial Clearance	5/8/2023	7/21/2023	Cured
Sonoma 68	Sonoma	Vegetation Management Patrols	Radial Clearance	5/8/2023	7/21/2023	Cured
Sonoma 69	Sonoma	Vegetation Management Patrols	Radial Clearance	5/8/2023	7/21/2023	Cured
Sonoma 70	Sonoma	Vegetation Management Patrols	Radial Clearance	5/8/2023	7/21/2023	Cured
Sonoma 71	Sonoma	Vegetation Management Patrols	Radial Clearance	5/8/2023	7/21/2023	Cured
Sonoma 72	Sonoma	Vegetation Management Patrols	Radial Clearance	5/8/2023	7/21/2023	Cured







Sonoma 156	Sonoma	Vegetation Management Patrols	Hazard Tree	7/28/2023	1/8/2024	ROC
Sonoma 157	Sonoma	Vegetation Management Patrols	Hazard Tree	7/28/2023	N/A	ROC
Sonoma 158	Sonoma	Vegetation Management Patrols	Hazard Tree	7/28/2023	10/13/2023	Cured
Sonoma 159	Sonoma	Vegetation Management Patrols	Hazard Tree	7/28/2023	10/13/2023	Cured
Sonoma 160	Sonoma	Vegetation Management Patrols	Hazard Tree	7/28/2023	N/A	Retracted
Sonoma 161	Sonoma	Vegetation Management Patrols	Hazard Tree	7/28/2023	10/13/2023	Cured
Sonoma 162	Sonoma	Vegetation Management Patrols	Radial Clearance	7/28/2023	N/A	ROC
Sonoma 163	Sonoma	Vegetation Management Patrols	Hazard Tree	7/28/2023	N/A	ROC
Sonoma 164	Sonoma	Vegetation Management Patrols	Hazard Tree	7/28/2023	10/13/2023	Cured
Sonoma 165	Sonoma	Vegetation Management Patrols	Hazard Tree	7/28/2023	10/13/2023	Cured
Sonoma 166	Sonoma	Vegetation Management Patrols	Hazard Tree	7/28/2023	10/13/2023	Cured
Sonoma 167	Sonoma	Vegetation Management Patrols	Hazard Tree	8/11/2023	N/A	ROC
Sonoma 168	Sonoma	Vegetation Management Patrols	Hazard Tree	8/11/2023	11/29/2023	Cured
Sonoma 169	Sonoma	Vegetation Management Patrols	Radial Clearance	8/11/2023	N/A	ROC
Sonoma 170	Sonoma	Vegetation Management Patrols	Hazard Tree	8/11/2023	11/29/2023	Cured
Sonoma 171	Sonoma	Vegetation Management Patrols	Hazard Tree	8/11/2023	11/29/2023	ROC
Sonoma 172	Sonoma	Vegetation Management Patrols	Hazard Tree	8/11/2023	11/29/2023	Cured
Sonoma 173	Sonoma	Vegetation Management Patrols	Hazard Tree	8/11/2023	11/29/2023	Cured
Sonoma 174	Sonoma	Vegetation Management Patrols	Radial Clearance	8/11/2023	N/A	ROC
Sonoma 175	Sonoma	Vegetation Management Patrols	Radial Clearance	8/11/2023	N/A	ROC
Sonoma 176	Sonoma	Vegetation Management Patrols	Hazard Tree	8/11/2023	11/29/2023	Cured
Sonoma 177	Sonoma	Vegetation Management Patrols	Hazard Tree	8/11/2023	11/29/2023	Cured
Sonoma 178	Sonoma	Vegetation Management Patrols	Hazard Tree	8/11/2023	11/29/2023	Cured
Sonoma 179	Sonoma	Vegetation Management Patrols	Hazard Tree	8/11/2023	11/29/2023	Cured
Sonoma 180	Sonoma	Vegetation Management Patrols	Hazard Tree	8/11/2023	11/29/2023	Cured
Sonoma 181	Sonoma	Vegetation Management Patrols	Hazard Tree	8/11/2023	1/2/2024	Cured
Sonoma 182	Sonoma	Vegetation Management Patrols	Hazard Tree	8/11/2023	11/29/2023	Cured
Sonoma 183	Sonoma	Vegetation Management Patrols	Hazard Tree	8/25/2023	12/14/2023	Cured
Sonoma 184	Sonoma	Vegetation Management Patrols	Hazard Tree	8/25/2023	12/14/2023	ROC
Sonoma 185	Sonoma	Vegetation Management Patrols	Hazard Tree	8/25/2023	12/14/2023	ROC
Sonoma 186	Sonoma	Vegetation Management Patrols	Hazard Tree	8/25/2023	12/14/2023	ROC
Sonoma 187	Sonoma	Vegetation Management Patrols	Hazard Tree	8/25/2023	12/14/2023	ROC
Sonoma 188	Sonoma	Vegetation Management Patrols	Hazard Tree	8/25/2023	12/14/2023	Cured
Sonoma 189	Sonoma	Vegetation Management Patrols	Hazard Tree	8/25/2023	12/14/2023	ROC
Sonoma 190	Sonoma	Vegetation Management Patrols	Hazard Tree	8/25/2023	12/14/2023	Cured
Sonoma 191	Sonoma	Electric Distribution Assets	Strain or Abrasion	9/22/2023	N/A	ROC
Sonoma 192	Sonoma	Vegetation Management Patrols	Hazard Tree	10/20/2023	2/10/2024	ROC
Sonoma 193	Sonoma	Vegetation Management Patrols	Hazard Tree	10/20/2023	2/10/2024	Cured
Sonoma 194	Sonoma	Vegetation Management Patrols	Radial Clearance	10/20/2023	2/10/2024	Cured
Sonoma 195	Sonoma	Vegetation Management Patrols	Hazard Tree	11/4/2023	3/1/2024	ROC
Sonoma 196	Sonoma	Vegetation Management Patrols	Hazard Tree	11/4/2023	N/A	Cured
Sonoma 197	Sonoma	Vegetation Management Patrols	Hazard Tree	11/4/2023	3/1/2024	ROC
Sonoma 198	Sonoma	Vegetation Management Patrols	Hazard Tree	11/17/2023	3/15/2024	ROC
Sonoma 199	Sonoma	Vegetation Management Patrols	Hazard Tree	11/17/2023	3/15/2024	ROC
Sonoma 200	Sonoma	Vegetation Management Patrols	Radial Clearance	11/17/2023	3/15/2024	Cured
Sonoma 201	Sonoma	Vegetation Management Patrols	Hazard Tree	11/17/2023	3/15/2024	Cured
Sonoma 202	Sonoma	Vegetation Management Patrols	Hazard Tree	11/17/2023	3/15/2024	Cured
Sonoma 203	Sonoma	Vegetation Management Patrols	Radial Clearance	11/17/2023	3/15/2024	Cured
Sonoma 204	Sonoma	Vegetation Management Patrols	Radial Clearance	11/17/2023	N/A	ROC
Sonoma 205	Sonoma	Vegetation Management Patrols	Radial Clearance	3/15/2024		Proposal Pending
Sonoma 206	Sonoma	Vegetation Management Patrols	Radial Clearance	3/15/2024	N/A	Cured
Sonoma 207	Marin	Vegetation Management Patrols	Radial Clearance	4/12/2024	11/1/2024	Pending Cure
Sonoma 208	Marin	Vegetation Management Patrols	Radial Clearance	4/12/2024	11/1/2024	Pending Cure
Sonoma 209	Sonoma	Electric Distribution Assets	Asset Maintenance	4/12/2024	N/A	Cured
Sonoma 214 <sup>17</sup>	Sonoma	Electric Transmission Assets	Asset Maintenance	5/31/2024		Proposal Pending

<sup>17</sup> The inspection reviews for Sonoma 210-213 were conducted after Year 2 of the Monitorship but the corresponding Deficiency Notices were issued before Sonoma 214 due to records review and PG&E communications conducted prior to the issuance of Sonoma 214.