BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities.	R.20-07-013 (Filed July 16, 2020)
NOT CONSOLIDATED	
Application of Pacific Gas and Electric Company (U 39 M) to Submit Its 2024 Risk Assessment and Mitigation Phase	A.24-05-008 (Filed May 15, 2024)
NOT CONSOLIDATED	
Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2027. (U 39 M)	A.25-05-009 (Filed May 15, 2025)

PACIFIC GAS AND ELECTRIC COMPANY'S (U39M)
SAFETY AND OPERATIONAL METRICS REPORT

(ATTACHMENT 1 SUPPORTING DOCUMENTATION
FILED ON ARCHIVAL GRADE DVD)

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Dated: September 30, 2025

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**PACIFIC GAS AND ELECTRIC COMPANY'S (U39M)
SAFETY AND OPERATIONAL METRICS REPORT**

**(ATTACHMENT 1 SUPPORTING DOCUMENTATION
FILED ON ARCHIVAL GRADE DVD)**

Pacific Gas and Electric Company (PG&E) hereby submits this semi-annual Safety and Operational Metrics Report in compliance with California Public Utilities Commission Decision (D.) 21-11-009. This is PG&E's eighth report which covers the period from January 1 to June 30, 2025. The report is provided as Attachment 1.

To assist in the review of this report, PG&E has identified material changes from the last report in blue font. PG&E has done this as a courtesy to parties. PG&E asks for the parties' understanding should there be any inadvertent mistakes in our good faith attempt at this formatting.

Separately, PG&E is concurrently filing and serving a "Notice of Availability of Pacific Gas and Electric Company's 'Safety and Operational Metrics Report:

Supporting Documentation'" due to the size of the electronic files associated with the material supporting the attached report.

Respectfully Submitted,

By: *_/s/ Peter Ouborg_*
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Dated: September 30, 2025

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 1

*(Attachment 1 Supporting Documentation
Filed On Archival Grade DVD Due To Format And Size)*

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT

SEPTEMBER 30, 2025

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SAFETY AND OPERATIONAL METRICS REPORT
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PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 1
INTRODUCTION

For this report Pacific Gas and Electric Company is identifying material changes in blue font.

A. Introduction

Pacific Gas and Electric Company (PG&E or the Company) respectfully submits this eighth semi-annual Safety and Operational Metrics (SOM) Report. This report is submitted in compliance with California Public Utilities Commission (CPUC or Commission) Decision (D.) 21-11-009 concerning the Risk-Based Decision-Making Framework proceeding (Risk OIR).

At PG&E, nothing is more important than the safety of our customers, employees, contractors, and communities. We strive to be the safest, most-reliable gas and electric Company in the United States, while keeping customer affordability at the forefront of our decisions and actions. This SOM report demonstrates PG&E's commitment to overseeing safe operations and, where needed, driving progress to reduce risk and improve performance. SOMs are embedded in our internal processes to give Company leaders visibility into performance to identify negative trends and take swift corrective actions to prevent harm. These metrics are central to safety performance across the Company.

PG&E has approached each SOM on a metric-by-metric basis. More specifically, PG&E evaluated our historical and current year performance and available benchmarking data, and established objectives that align with our commitment to safety. For example, a metric where PG&E already performs in the first quartile may not demand dramatic improvement, but could require consistent monitoring to ensure that performance remains at acceptable levels. For metrics that include Major Event Days (MED), PG&E will use the information to help ensure that our infrastructure is adaptable to an environment rapidly changing due to climate change. For some metrics, the Company has found opportunity to continue to drive safety performance through ongoing or future programs that are described in each chapter of this report.

B. Background and Requirements

As part of the decision for PG&E's Plan of Reorganization (D.20-05-053), the Commission envisioned a set of metrics that provides a "holistic quantitative and qualitative 'indicator light' method to evaluate key metrics directly associated with PG&E safe and operational performance."

On November 9, 2021, through the Commission's Risk OIR that began on November 17, 2020, the Commission issued D.21-11-009 (the Risk OIR decision) establishing 32 SOMs. Ordering Paragraph 5 of that decision requires that:

> PG&E shall report its Safety and Operational Metrics as follows. PG&E shall, on a semi-annual basis, serve and file its SOMs report in Rulemaking 20-07-013, any successor Safety Model Assessment Proceeding, and its most recent or current General Rate Case and Risk Assessment and Mitigation Phase proceedings starting March 31, 2022, and continuing annually at the end of September and March thereafter, with the March reports covering the 12 months of the previous calendar year (i.e., January through December) and the September reports providing data for January through June of the current year. PG&E shall concurrently send a copy of its semi-annual SOMs reports to the Director of the Commission's Safety Policy Division and to RASA_Email@cpuc.ca.gov. PG&E shall:
>
> a) Report on each SOM, using data for the preceding 12 months and providing all available historical data;[1]
> b) For each SOM, provide a proposed target for the year following the reporting period for each metric and a 5-year target, with the proposed target represented as specific values, ranges of values, a rolling average, or another specified target value, except for our final adopted SOM #s 1.3, 2.3, 3.1, 3.3, 3.5, and 3.6 for which PG&E may provide directional targets;
> c) For each SOM, provide a narrative description of the rationale for selecting the target proposed and why a specific value, a range of values, a rolling average or another type of target is selected;
> d) For each SOM, provide a narrative description of progress towards the proposed annual and 5-year targets;
> e) For each SOM, provide a narrative description of any substantial deviation from prior trends based on quantitative and qualitative analysis, as applicable;
> f) For each SOM, provide a brief description of current and future activities to meet the proposed targets; and

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1 These historic data files are provided through a Notice of Availability (NOA) being filed concurrently with this report. An index of these files is provided as an attachment to the NOA.

g) Provide the Commission's Safety and Policy Division with a copy of any report filed more frequently than semi-annually with the Commission that contains SOMs, at the same time the report is filed.[2]

This report outlines PG&E's January through June 2025 performance and is organized into 32 individual metric chapters as defined in Attachment A of D.21-11-009. Each chapter provides discussion on performance and progress against 1- and 5-year targets.

Additionally, Order Paragraph 7 of D.21-11-009 states:

> PG&E shareholders shall pay for an independent third-party audit of PG&E's SOMs data collection and reporting processes within the next three years to ensure accuracy and compliance with SOMs reporting requirements.

The required audit was performed by Filsinger Energy Partners (FEP) with the final report submitted to the Commission on June 9, 2025.[3] In Section A, "Audit Results" was added to each metric chapter to capture FEP audit findings and PG&E's response to the audit findings. The table below summarizes the audit findings and the actions taken to address the findings.

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[2] PG&E understands this requirement to not include one-time event triggered reports (e.g., Electric Incident Reports). PG&E can provide such reports upon request. Note that PG&E provided quarterly reports as part of the Wildfire Mitigation Plan to the Commission through June 2021 but are now submitted to the Office of Energy Infrastructure Safety. These reports can be found online at PG&E's Wildfire Mitigation Plan webpage.

[3] PG&E SAFETY AND OPERATIONAL METRICS AUDIT REPORT, Prepared for: California Public Utilities Commission, June 9, 2025 (hereinafter "Audit Report").

TABLE 1-1
SUMMARY OF FEP AUDIT FINDINGS

Metric	Accuracy Finding	Corrective Action Taken	Status	More Information (Ch./Pg.)
Metric 1.1	Minor	The finding for this metric was due to a discrepancy in the yearly total employee hours for 2021 (December) and two incident count corrections (one in August of 2021 and one in January of 2023).	Resolved	1.1-4
Metric 1.2	Minor	The finding for this metric was due to a discrepancy in the 2023 mid-year report contractor hours and incident count due to differences in the ISNetworld (ISN) data and changes resulting from PG&E's Quality Assurance/Quality Control process.	Resolved	1.2-4
Metric 1.3	None	N/A	N/A	1.3-2
Metric 2.1	None	N/A	N/A	2.1-1
Metric 2.2	None	N/A	N/A	2.2-1
Metric 2.3	Significant	The Other Findings for this metric were "Discrepancy between CESO data pulled monthly and annually." The finding has not been resolved. The corrections implemented include enhancements to existing processes whereby outage data, specifically Global Positioning System Open Point latitude and longitude coordinates provided in Integrated Logging and Information System (ILIS), are combined with the HFTD definition in our Electric Distribution Geographic Information System to identify outages in the HFTD. This reanalysis enables improved spatial alignment of outages and wires down events with HFTD designations. For this reporting period, corrected HFTD designations have been applied to both historical and current outage data from 2019 through June 2025. The findings are expected to be resolved with an automated data set by Q4 2025. This is part of a multi-year PG&E plan to align its reliability reporting practices with the IEEE 1366-2022 standard.	The Other Findings have not been resolved. The HFTD designations are expected to be resolved by Q4 2025.	2.3-1
Metric 2.4	Significant	See Metric 2.3	See Metric 2.3	2.4-1
Metric 3.1	Significant	The Other Findings for this metric were "ILIS as the database of record impacts event counts." These findings have not been resolved and are in progress. The corrections implemented include enhancements to existing processes whereby outage data, specifically Global Positioning System Open Point latitude and longitude coordinates provided in Integrated Logging Information System (ILIS), are combined with the HFTD definition in our Electric Distribution Geographic Information System to identify outages in the HFTD. This reanalysis enables improved spatial alignment of outages and wires down events with HFTD designations. For this reporting period, corrected HFTD designations have been applied to both historical and current outages and wires down event data from 2013 through June 2025. The findings are expected to be resolved with an automated data set by Q4 2025. This is part of a multi-year PG&E plan to align its reliability reporting practices with the IEEE 1366-2022 standard.	The Other Findings have not been resolved and are in progress. The HFTD designations are expected to be resolved by Q4 2025.	3.1-1
Metric 3.2	Significant	See Metric 3.1	See Metric 3.1	3.2-1
Metric 3.3	None	N/A	N/A	3.3-1

TABLE 1-1
SUMMARY OF FEP AUDIT FINDINGS
(CONTINUED)

Metric	Accuracy Finding	Corrective Action Taken	Status	More Information (Ch./Pg.)
Metric 3.4	Minor	The finding for this metric was based on verification of Metric Results for Wires Down events in 2022 Safety and Operational Metrics (SOM) reporting. The finding has been resolved. The corrections implemented include: verifying the correct HFTD designation was reported in previous filings for reporting years 2021 through 2024 inclusive, correcting any errors discovered, and adjusting annual performance and targets, if applicable. The only correction was with the 2022 data which is reflected in this report filing.	Resolved	3.4-1
Metric 3.5	Significant	See Metric 3.1	See Metric 3.1	3.5-1
Metric 3.6	None	N/A	N/A	3.6-1
Metric 3.7	Significant	This finding was based on a conclusion that manual calculation of asset inspection due dates across multiple program years and strategies led to data errors. The finding has been resolved, actions taken to date are listed below. The following corrective actions are currently in place: Due dates for 2024/2025 have been reviewed and corrected per GO 165 and Wildfire Mitigation Plan (WMP) via peer review. These corrections are reflected in this report. In addition, the following procedural improvements are being implemented. Updated 2025 guidance and training clarify inspection and patrol intervals and necessary steps to be taken to identify a "last patrol" when faced with Geographic Information System issues and standardized reporting formats are being set for WMP and SOMs, with personnel trained on new guidelines. In addition, we will move to digitized patrols by December 1, 2026.	Resolved	3.7-2
Metric 3.8	Significant	This finding was based on a conclusion that manual calculation of asset inspection due dates across multiple program years and strategies led to data errors. The finding has been resolved, actions taken to date are listed below. The following corrective actions are currently in place: Due dates for 2024/2025 have been reviewed and corrected per GO 165 and Wildfire Mitigation Plan (WMP via peer review. These corrections are reflected in this report. In addition, the following procedural improvements have been implemented. Updated 2025 guidance and training clarify inspection and patrol intervals and necessary steps to be taken to identify a "last inspection" when faced with GIS issues and standardized reporting formats are being set for WMP and SOMs, with personnel trained on new guidelines.	Resolved	3.8-2
Metric 3.9	Minor	The finding was based on minor data inaccuracies. The finding has been resolved. The corrections include addressing the following identified discrepancies: HFTD classification errors; Late Patrol criteria ambiguities; duplicate records (the Audit Report found 151 duplicate patrol records across 2021–2023); and Multiple Patrols per asset. These corrections and updates are reflected in this report filing.	Resolved	3.9-2
Metric 3.10	Minor	The finding for this metric was based on minor data inaccuracies that include, The 2023 full year dataset incorrectly included inspections in HFRA and Zone 1, In 2021, FEP found 40 late inspections, while PG&E reported 36 and Assets often have multiple inspections (e.g., ground, drone, climbing), but the metric should count only one required inspection per asset. The findings have been resolved. The corrections implemented include: HFTD classification inconsistency; missing inspection records; incomplete inspection history; and multiple inspection types inflating the denominator. These corrections and updates are reflected in this report filing.	Resolved	3.10-3

TABLE 1-1
SUMMARY OF FEP AUDIT FINDINGS
(CONTINUED)

Metric	Accuracy Finding	Corrective Action Taken	Status	More Information (Ch./Pg.)
Metric 3.11	Significant	This finding was due to erroneous calculations from Vegetation Management, Transmission, and Distribution. The findings are partially resolved. The erroneous calculations for 2021 have been corrected. In this report PG&E has reported the corrected 2021 calculations for Transmission, Vegetation Management, and Distribution in the 2021 metric values. As part of the audit, PG&E has identified a population of EC notifications with erroneous compliance due dates and is investigating underlying causes and establishing corrective actions. The corrective actions for Distribution will be tracked by Corrective Action Plan with an anticipated resolution date of December 31, 2025.	The findings are partially resolved with an anticipated resolution date of December 31, 2025.	3.11-2
Metric 3.12	None	N/A	N/A	3.12-1
Metric 3.13	None	The Other Findings for this metric were "Some discrepancy between event coordinates and HFTD designations that did not impact metric results." The findings have been resolved. After review of the data, PG&E has confirmed that the HFTD designations for ignitions data come from the fire latitude and longitude based on the fire start location and not the outage location, and therefore no further action was necessary to ensure accuracy.	Resolved	3.13-2
Metric 3.14	None	The Other Findings for this metric was "Some discrepancy between event coordinates and HFTD designations that did not impact metric results. Line miles were inconsistent amongst reports and data sources." The findings have been resolved. With respect to the HFTD designations, after view of the data PG&E has confirmed that the HFTD designations for ignitions data comes from the fire latitude and longitude based on the fire start location and not the outage location, and therefore no further action was necessary to ensure accuracy. With respect to the line miles, we are coordinating to ensure accuracy amongst reports and data sources going forward.	Resolved	3.14-2
Metric 3.15	None	N/A	N/A	3.15-2
Metric 3.16	None	The Other Findings for this metric were "Line miles were inconsistent amongst reports and data sources." The findings have been resolved. We are coordinating to ensure accuracy amongst reports and data sources going forward.	Resolved	3.16-2
Metric 4.1	None	N/A	N/A	4.1-2
Metric 4.2	None	The Other Findings for this metric include "Low pressure events are excluded from the calculation." While Federal code 49 CFR 192.201 does not provide a numerical threshold for events on low pressure systems, PG&E tracks these events internally based on the guidelines set forth in CPUC General Order 58 A and can be provided upon request.	Resolved	4.2-2
Metric 4.3	None	The Other Findings for this metric include "Response times for crews who were already onsite included for a small number of events." With respect to this finding, response times for crews who were already onsite are excluded from the metric. However, very short response times may be included for a small number of events but do not affect the accuracy of our reported metric.	Resolved	4.3-2
Metric 4.4	None	N/A	N/A	4.4-2
Metric 4.5	None	N/A	N/A	4.5-2

TABLE 1-1
SUMMARY OF FEP AUDIT FINDINGS
(CONTINUED)

Metric	Accuracy Finding	Corrective Action Taken	Status	More Information (Ch./Pg.)
Metric 4.6	None	The Other Findings for this metric include "Data should be pulled after the month closes." This finding has been resolved.	Resolved	4.6-1
Metric 4.7	None	N/A	N/A	4.7-2
Metric 5.1	None	N/A	N/A	5.1-5
Metric 6.1	None	N/A	N/A	6.1-2

C. PG&E's Approach to Safety and Operational Metrics Target Setting

PG&E's approach to SOMs was developed around four pillars for developing targets that align with the Commission's objective for this report:

1) Targets should be set at levels indicating "insufficient progress" or "poor performance" within the context of the Enhanced Oversight and Enforcement Process;
2) Targets should be set at a reasonable and attainable level, including, but not limited to the following considerations:
   a) Historical data and trends;
   b) Benchmarking;
   c) Applicable federal, state, or regulatory requirements;
   d) Resources;
3) Targets should be set at levels where performance can be sustained over time; and
4) Targets should be set and evaluated in consideration of a holistic qualitative and quantitative view including additional contextual information and factors.

With these criteria, PG&E sought to develop targets for each metric that generally maintain performance for well-performing metrics or drive performance improvement to satisfactory levels of safe and reliable service. As required by the decision, within each metric chapter PG&E provides the rationale behind the selection of the 1- and 5-year targets. On their own, metrics can fail to tell a complete story and may not provide crucial detail or context that is necessary for a proper evaluation of performance or progress. Recognizing that, the Commission's Risk OIR decision requires PG&E to provide a narrative-driven report that gives the Commission further insight on how PG&E's safety and operational programs are progressing towards targets or if performance is deviating from target and trend, and to state current and future activities that will drive performance towards target or trend.

5) PG&E and the Commission's Safety Policy Division (SPD) continue to participate in monthly meetings to discuss questions arising from prior reports, or, in some instances to preview expected performance or target-setting for upcoming reports. These meetings have proven successful in providing PG&E ongoing guidance for target-setting and as an effective way to resolve questions through metric owner presentations.

Additionally, PG&E uses feedback from these meetings to engage leadership and to address SPD recommendations where possible. PG&E will continue to drive performance improvement where appropriate, and prioritize the safety of our customers, contractors, and employees.

D. Summary of Metric Performance Against Targets

PG&E has updated the one-year and five-year targets on SOMs 2.4, 3.1, 3.2, 3.4, and 3.5 to account for the correction to the High Fire Threat District (HFTD) classification of outages and wires down as identified in the third-party SOMs Audit performed by FEP. The target setting methodology for SOMs 2.4 was also adjusted to align with SOMs 2.1 and 2.2. This report shows that for the period January through June 2025, PG&E is exceeding or maintaining performance expectations against its 2025 targets for all 32 of the SOMs metrics.

Below is a summary of the performance and targets for each metric over the period January through June 2025. The details for each metric can be found in the metric report chapters that follow.

TABLE 1-2
SUMMARY OF JANUARY – JUNE 2025 METRIC PERFORMANCE AND TARGETS

#	Metric	Jan – Jun 2025 Performance	2025 Target	2029 Target
Safety				
1.1	Rate of Serious Injury or Fatality (SIF) Actual (Employee)	Rate: 0.04	Rate: 0.06	Rate: 0.06
1.2	Rate of SIF Actual (Contractor)	Rate: 0.01	Rate: 0.10	Rate: 0.10
1.3	SIF Actual (Public)	0	Demonstrate progress towards 0	Demonstrate progress towards 0
Reliability				
2.1	System Average Interruption Duration (Unplanned)	1.49 hrs. per customer	3.71 – 5.73 hrs. per customer	3.68 – 5.69 hrs. per customer
2.2	System Average Interruption Frequency (Unplanned)	0.720 outages per customer	1.435 – 2.219 outages per customer	1.555 – 2.405 outages per customer
2.3	System Average Outages due to Vegetation and Equipment Damage in HFTD Areas MEDs	4 Customers Experiencing Sustained Outages (CESO) due to 1 Major Event Day (MED)	Maintain	Maintain
2.4	System Average Outages due to Vegetation and Equipment Damage in HFTD Areas (Non-MEDs)	898 CESO	2112-3266 CESO	2112-3266 CESO

TABLE 1-2
SUMMARY OF JANUARY – JUNE 2025 METRIC PERFORMANCE AND TARGETS (CONTINUED)

#	Metric	Jan – Jun 2025 Performance	2025 Target	2029 Target
Electric				
3.1	Wires Down MED in HFTD Areas (Distribution)	0 wires down (WD) events/1,000 miles due to 1 MED	Maintain/107.50	Maintain/107.50
3.2	Wires Down Non-MED in HFTD Areas (Distribution)	18.44 WD events/1,000 miles	Maintain/45.08	Maintain/45.08
3.3	Wires Down MED in HFTD Areas (Transmission)	0 WD events/1,000 miles due to 1 MEDs	Maintain/8.433	Maintain/<8.433
3.4	Wires Down Non-MED in HFTD Areas (Transmission)	1.302 WD events/1,000 miles	Maintain/≤4.392	Maintain/≤4.392
3.5	Wires Down Red Flag Warning Days in HFTD Areas (Distribution)	0 WD due to 0 WD events	Maintain/.00068	Maintain/.00068
3.6	Wires Down Red Flag Warning Days in HFTD Areas (Transmission)	0 WD due to 0 WD events	Maintain	Maintain
Patrols and Inspections				
3.7	Missed Overhead Distribution Patrols in HFTD Areas	0%	0% – 4%	0% – 1%
3.8	Missed Overhead Distribution Detailed Inspections in HFTD Areas	0%	0% – 2%	0% – 1%
3.9	Missed Overhead Transmission Patrols in HFTD Areas	0.00%	0.00% – 0.03%	0.0% – 0.02%
3.10	Missed Overhead Transmission Detailed Inspections in HFTD Areas	0.00%	0.00% – 0.03%	0.0% – 0.02%
3.11	GO-95 Corrective Actions in HFTDs	82.3%	74%	86%
3.12	Electric Emergency Response Time	Average: 28 min Median: 27 min	Average: 44 min Median: 43 min	Average: 44 min Median: 43 min

TABLE 1-2
SUMMARY OF JANUARY – JUNE 2025 METRIC PERFORMANCE AND TARGETS (CONTINUED)

#	Metric	Jan – Jun 2025 Performance	2025 Target	2029 Target
Ignitions and Wildfire				
3.13	Number of CPUC-Reportable Ignitions in HFTD Areas (Distribution)	24 ignitions	70 – 128 ignitions	70 – 128 ignitions
3.14	Percentage of CPUC-Reportable Ignitions in HFTD Areas (Distribution)	0.97/1,000 circuit miles	2.83 – 5.18/1,000 circuit miles	2.83 – 5.18/1,000 circuit miles
3.15	Number of CPUC-Reportable Ignitions in HFTD Areas (Transmission)	2 ignitions	4 – 12 ignitions	4 – 12 ignitions
3.16	Percentage of CPUC-Reportable Ignitions in HFTD Areas (Transmission)	0.37/1,000 circuit miles	0.74 – 2.23/1,000 circuit miles	0.74 – 2.23/1,000 circuit miles
Gas				
4.1	Number of Gas Dig-Ins per 1,000 USA tickets on Transmission and Distribution pipelines	1.06	≤1.94	≤1.90
4.2	Number of Overpressure Events	4	≤10	≤8
4.3	Time to Respond On-Site to Emergency Notification	Average (mins): 19.8 Median (mins): 18.3	Average (mins): ≤21.3 Median (mins): ≤19.6	Average (mins): ≤20.9 Median (mins): ≤19.2
4.4	Gas Shut-In Times, Mains	71.5 mins	≤87.4 mins	≤87.4 mins
4.5	Gas Shut-In Times, Services	31.3 mins	≤39.8 mins	≤39.8 mins
4.6	Uncontrolled Release of Gas on Transmission Pipelines	853	≤3,440	≤3,304
4.7	Time to Resolve Hazardous Conditions	124.5 mins	≤173.9 mins	≤171.9 mins
Clean Energy				
5.1	Clean Energy Goals Compliance Metric	Not Available	≥2,366.1 MW	≥2,666.1 MW
Quality of Service				
6.1	Quality of Service Metric	5 sec	≤15 sec	≤15 sec

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 1.1

RATE OF SIF ACTUAL

(EMPLOYEE)

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
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PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 1.1
RATE OF SIF ACTUAL
(EMPLOYEE)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (1.1) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 1.1 – Rate of Serious Injury and Fatality (SIF) Actual (Employee) is defined as:

Rate of SIF Actual (Employee) is calculated using the formula: Number of SIF-Actual cases among employees x 200,000/employee hours worked, where SIF Actual is counted using the methodology developed by the Edison Electric Institute's (EEI) Occupational Safety and Health Committee (OS&HC).

2. Introduction of Metric

Pacific Gas and Electric Company's (PG&E or the Company) safety stand is, "Everyone and Everything Is Always Safe." This includes our employee and contractor workforce, as well as the public. We remain committed to building an organization where every work activity is designed to facilitate safe working conditions and every member of our workforce is encouraged to speak up if they see an unsafe or risky condition with the confidence that their concerns and ideas will be heard and addressed. As part of this stand, PG&E is committed to employee safety.

As defined by Decision (D.) 21-11-009, the Serious Injury & Fatality (SIF) Actual (Employee) SOM calculation is applied to PG&E's existing injury and SIF dataset. The data were analyzed and reported under this definition beginning with the first report which was submitted in March of 2022.

The Edison Electric Institute (EEI) Occupational Safety & Health Committee (OS&HC) has oversight over the SIF Criteria, which are reviewed annually and updated based on additional learnings from injury classification to provide further clarification or criteria for the following year. The EEI SIF Criteria were revised and published in 2024. PG&E began using the revised EEI SIF Criteria effective January 1, 2025.[1]

PG&E uses the 2025 EEI SIF Criteria found in Appendix 9 of the EEI Safety Classification and Learning (SCL) Model guidance.[2] The criteria include:

1) Fatalities;
2) Amputations (involving bone) excludes distal phalanx;
3) Head trauma that results in a Traumatic Brain Injury, intracranial bleeding, or loss of consciousness for greater than 30 minutes;
4) Injury or trauma to vital organs to include brain, spinal cord, heart, lungs, kidneys, liver, spleen, large and small intestine, and stomach;
5) Bone fractures requiring surgery for repair (pins, rods, screw, plates, wires, etc.) excludes fingers and toes;
6) Acute traumatic herniated disc with neurologic deficit—sensory or motor;
7) Second-degree burn (10 percent body surface); third-degree burn (5 percent of body surface); or second-degree burn requiring skin graft.
8) Eye injuries resulting in permanent vision loss or change in vision;
9) High pressure injection injuries requiring surgical debridement and irrigation;
10) Heat stroke;
11) Dislocation of the hip, elbow, or knee;
12) Electrical contact injuries;
13) Vascular trauma requiring surgery;
14) Acute chemical or radiological exposure resulting in injury to vital organs to include brain, spinal cord, heart, lungs, kidneys, liver, spleen, large and small intestine, and stomach; and
15) Other injuries.

PG&E's SIF Prevention Program was deployed at the end of 2016 to establish a cause evaluation process for coworker serious safety incidents.

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1 EEI Serious Injury and Fatality (SIF) Criteria.

2 EEI Safety Classification and Learning (SCL) model guidance. EEI SIF Criteria are in Appendix 9 of the SCL model report.

This program was established to create consistency and guidance in classifying and evaluating serious safety incidents for all employees and contractors.

The goal of PG&E's SIF Prevention Program is to reduce the number and severity of safety incidents that result in a SIF. The program's objective is to learn from prior safety incidents by performing cause evaluations on each SIF Actual (SIF-A) and SIF Potential (SIF-P) incident, implementing corrective actions, and sharing key findings and learnings across the enterprise.

From 2017 to 2020, PG&E classified SIF-A incidents based on the job task and whether a life altering or life-threatening injury, or fatality occurred. In August of 2020, PG&E adopted Edison Electric Institute's (EEI) Safety Classification and Learning (SCL)[3] model to classify its SIF incidents. The EEI SCL model classifies incidents into categories: High-Energy SIF (HSIF),[4] Low-Energy SIF (LSIF),[5] Potential SIF (PSIF),[6] Capacity,[7] Exposure,[8] Success,[9] and Low Severity.[10] Adopting the EEI SCL model has improved the SIF Program by bringing a consistent and objective approach to reviewing and classifying incidents across the Company and industry. The SCL model allows the Company to focus its safety and risk mitigation efforts on the most serious outcomes and highest risk work where a high energy is present, or a high-energy incident occurred. The EEI SCL

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3 EEI SCL Model available here: https://www.safetyfunction.com/scl-model.

4 *Id.* at p. 19, HSIF is defined as: "Incident with a release of high energy in the absence of a direct control where a serious injury is sustained."

5 *Id.* at p. 19, LSIF is defined as: "Incident with a release of low energy in the absence of a direct control where a serious injury is sustained."

6 *Id.* at p. 19, PSIF is defined as: "Incident with a release of high energy in the absence of a direct control where a serious injury is not sustained."

7 *Id.* at p. 19, Capacity is defined as: "Incident with a release of high energy in the presence of a direct control where a serious injury is not sustained."

8 *Id.* at p. 19, Exposure is defined as: "Condition where high energy is present in the absence of a direct control."

9 *Id.* at p. 19, Success is defined as: "Condition where a high energy incident does not occur because of the presence of a direct control."

10 *Id.* at p. 19, Low Severity is defined as: "Incident with a release of low energy where no serious injury is sustained."

model is also used for the Employee SIF-A Safety Performance Metric (SPM) and is aligned with other California utilities.

The rate of SIF-A (Employee) SOM definition is based on the EEI SIF Criteria.[11]

PG&E began using the updated EEI Criteria effective January 1, 2025.[12]

3. Audit Results

In the Audit Report, Metric 1.1 received a Metric Accuracy Finding of "Minor."[13] The finding for this metric was due to a discrepancy in the yearly total employee hours for 2021 (December) and two incident count corrections (one in August of 2021 and one in January of 2023).[14] The findings have been resolved.

The total employee hours for 2021 were incorrect due to either post-report adjustment or data entry error. The hours in December were corrected from 4,393,539 to 4,551,618.

The two incidents not reported did not initially appear to meet EEI SIF Criteria for bone fracture due to uncertainty in the diagnoses. It was later determined based on additional information that the injuries met the EEI SIF Criteria of bone fractures. For the incident that occurred on August 5, 2021 (SEMS 10093659), the initial review indicated that the employee was taken to the hospital and then discharged with no further updates provided in 2021. The employee had surgery on April 14, 2022, and as a result, one incident was added to the August 2021 total.

For the incident that occurred on January 25, 2023 (SEMS 10102717), the initial incident report appeared to be an ankle injury only. The incident was later determined to be a bone fracture. As a result, one incident was added to January 2023 total. As a process improvement in 2025, we review incidents classified as Occupational Safety and Health Administration

11 EEI Serious Injury and Fatality (SIF) Criteria effective January 1, 2025.

12 EEI Serious Injury and Fatality (SIF) Criteria.

13 Audit Report, p. 8, Table 1-1.

14 Audit Report, p. 13 (Verification of Employee Hours) and p. 14 (Verification of Employee SIF Actual).

(OSHA) recordables to confirm EEI SIF Criteria. These updates are reflected in this report filing.

B. (1.1) Metric Performance

1. Historical Data (2017 – 2024)

PG&E includes historical data for the years 2017 through 2024[15] in this report. This timeframe is consistent with the implementation of PG&E's SIF Program. The dataset includes injury type, incident date, location, and EEI SIF Criteria classification. See corresponding Employee SIF SOM data file for a list of incidents.

Figure 1.1-1 illustrates the rate of employee serious injuries and fatalities by year from 2017 through 2024. From 2017 through 2024 there are a total of 87[16] employee SIF Actuals that met the EEI SIF Criteria as described in Section A.2. above. Out of the 87 employee SIF Actuals, 6 resulted in fatalities and 81 resulted in serious injuries. Out of the 81 serious injuries, fifty-six percent (45 of 81) met the criteria of bone fracture, including the hands, feet, ankle, and legs. Of the 6 fatalities, one involved a violent act of a third party, three involved operations of motor vehicles, one involved a pipeline drying (pigging) line of fire incident, and one involved a tire changing incident. The last fatality involving an employee occurred on January 31, 2023.

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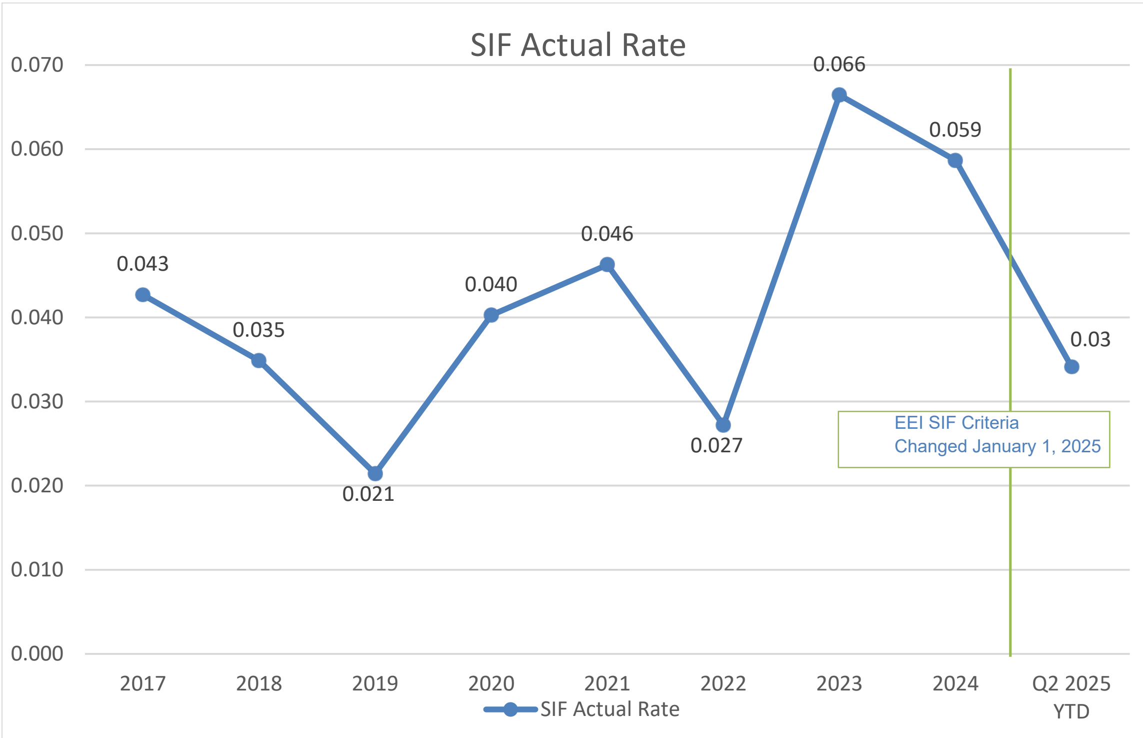
15 Historical data through 2021 was provided in PG&E's first SOM report provided on April 1, 2022.

16 Employee SIF Actual count updated to include two incidents (August 2021 and December 2023) not in the April 1, 2025, filing. Employee labor hours also revised from 4,393,539 to 4,551,618 (December 2021). See footnote 17 for 2021 and 2023 rate updates and A. (1.1 Overview), Sec. 3, Audit Results.

FIGURE 1.1-1
RATE OF SIF ACTUAL (EMPLOYEE)
HISTORICAL PERFORMANCE



Note: Figure 1.1-1, Table. Following 2021 and 2023 incident count corrections and a December 2021 labor hour adjustment, the above chart reflects updated rates: 2021 from 0.042 to 0.046, and 2023 from 0.063 to 0.066. Refer to A. (1.1 Overview), Sec. 3, Audit Results for details.

2. Data Collection Methodology

Injury data are collected by the Nurse Care Line (NCL). The NCL is an enhanced injury reporting process for reporting major and minor work-related injuries. The NCL allows employees to speak up, without fear, when faced with a work-related health challenge, strengthening the message that employee health is essential. Employees receive medical advice, self-care information, and clinic referrals from the NCL. For this review, injury data was pulled from PG&E's Safety and Environmental Management System (SEMS) database, which houses all employee injury data.

As mentioned above, the SIF-A (Employee) SOM as defined in D.21-11-009 is applied to PG&E's injury and SIF dataset, and 2022 was the first year in which the data were analyzed and reported under this definition.

To evaluate and establish historical performance for the SIF-A (Employee) SOM metric, PG&E reviewed all employee injury data from 2017 through 2021 to determine if any met one of the 14[17] EEI SIF Criteria as summarized in Section A.2. above. To establish historical performance for the first SOMs report submittal, PG&E reviewed approximately 18,000-line items of injury data. A substantial portion of those were not OSHA-recordable (i.e., first aid, non-OSHA recordable) and were removed from the population. The remaining population that met the OSHA definition (i.e., work-related injury) was reviewed against the EEI SIF Criteria for this report.

3. Metric Performance for the Reporting Period

Figure 1.1-1 also illustrates the rate of employee serious injuries from January 1, 2025, through June 30, 2025. Through the first half of 2025, there were 5 employee serious injuries. 80 percent of the employee serious injuries were due to bone fractures (4 of 5). These included bone fractures of the ankle, elbow, foot and wrist.

The second quarter 2025 SIF rate of 0.03[18] is a decrease from the second quarter 2024 rate of 0.049. PG&E's current and planned work activities for improving the long-term performance of this metric are discussed in Section E below. The last fatality involving an employee occurred on January 31, 2023.

C. (1.1) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

There have been no changes to the 1-year and 5-year targets since the last SOMs report filing. The 2025 target for rate of SIF-A (Employee) is to remain in the 1st quartile of the total company industry benchmarking average (see Figure 1.1-2 below). PG&E's threshold of 0.06 considered EEI benchmarking data using previously approved EEI SIF Criteria.

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17 The EEI SIF Criteria included a list of 14 during the 2017 – 2024 injury data review. The list was updated to 15 in 2025 (updated EEI SIF Criteria referenced in Section A.2).

18 At the beginning of 2025, the rates were updated from three to two decimal places. Rates for prior years remain unchanged and continue to be reported to three decimal places.

Targets will be re-established once benchmarking data using the new EEI SIF Criteria become available (effective January 1, 2025). As such, we continue to monitor this target, as well as changes in EEI benchmarking data.

2. Target Methodology

To establish the 1-year and 5-year target thresholds, PG&E considered the following factors:

- Historical Data and Trends: PG&E pulled OSHA recorded injuries from 2017 to 2021 to review each injury against the EEI SIF Criteria. This injury dataset was used because it aligns with the beginning of the PG&E SIF Prevention Program (est. in 2017). Over that historical data period, performance showed a consistent trend at or around 0.040 injury rate, with a dip in 2019 and trend back up in 2020 and 2021. A similar pattern occurred for the years 2022 and 2023 with a dip in rate and then an increase, but still below the 2023 threshold target rate of 0.070. For 2024, PG&E's 2024 target threshold for the employee SIF Actual is 0.060 which represents 0.010 target decrease comparable with PG&E internal benchmarking practices. While PG&E saw an improvement in injury severity in 2024 (including zero fatalities and lower severity non-fatal SIFs), we also saw an increase in SIF-A rate and, thus, made the decision not to lower the target for 2025. With the 2024 EEI third-quartile threshold value increasing slightly from 0.070 to 0.090, and with the new EEI SIF Criteria taking effect January 1, 2025, we continue to monitor this target. (See Figure 1-1.2 below).
- Benchmarking: In July 2022, PG&E met with EEI leadership and confirmed that EEI SIF Criteria benchmarking is available for the metric going back to 2017. Since then, PG&E has used benchmarking data from EEI for comparison with PG&E's performance. PG&E's performance for 2024 – Q2 2025 is first-quartile.
- Regulatory Requirements: None
- Attainable Within Known Resources/Work Plan: Yes. We are focusing on high energy hazard identification and implementation of essential controls on the job to build the capacity to fail safely.

- Appropriate/Sustainable Indicators: While the performance at or below the target threshold is sustainable, the more appropriate metric is to focus on injuries resulting from a high energy incident, which is consistent with both industry SIF-A monitoring and the SPM.
- Other Qualitative Considerations: This target threshold approach was established to account for all job-related tasks with the potential to cause injury as defined by the EEI SIF Criteria.

3. 2025 and 2029 Target

The initial 2022 and 2026 target thresholds were to maintain at a rate of less than 0.080 which allowed for no more than an increase of 0.038, as compared to highest employee SIF Actual rate from 2017 to 2021. The target threshold for 2023 incorporated available EEI employee SIF benchmarking data and the use of the second to third quartile threshold value of 0.070. The 2024 and 2028 target thresholds considered EEI benchmarking data, with a 0.010 target decrease in 2024, comparable with PG&E internal benchmarking practices. PG&E has internal targets that are more restrictive than these targets and are being used to drive SIF performance, such as SIF-Actual Count.

As discussed in C.1 above, PG&E's 2025 and 2029 target thresholds are in line with available EEI benchmarking data and PG&E's target-setting practices.

D. (1.1) Performance Against Target

1. Progress Towards the 1-Year Target

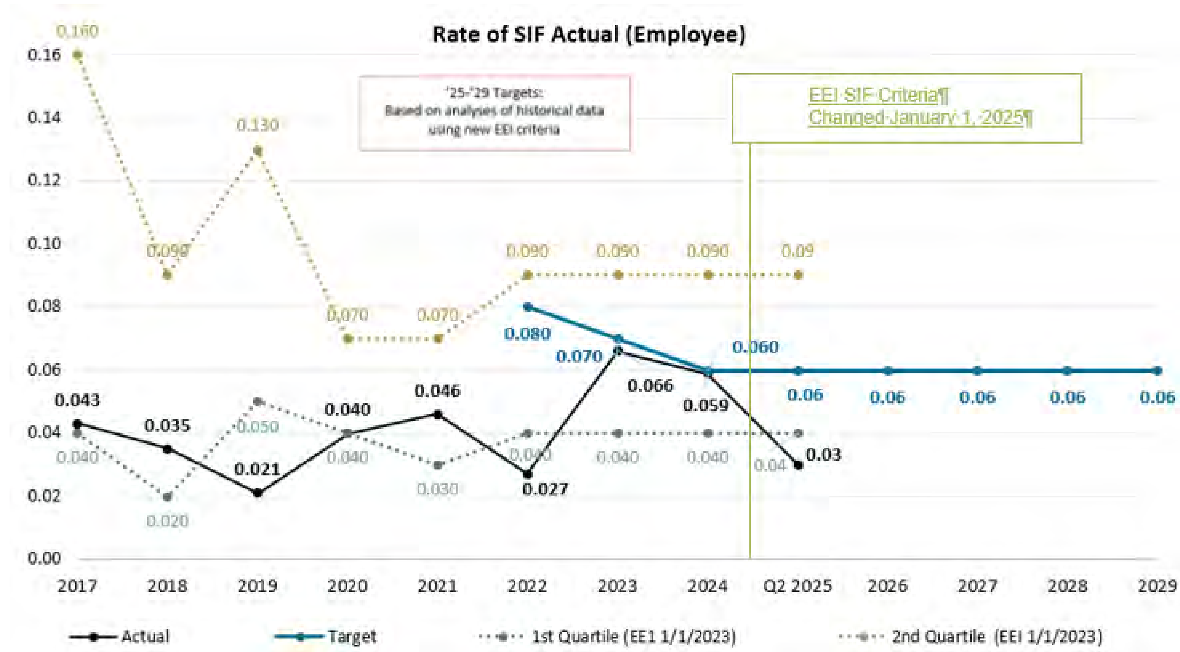
As demonstrated in Figure 1.1-2 below, in the first half of 2025, the Employee SIF Actual rate of 0.03 was a decrease compared to the same period in 2024. The employee serious injuries contributing to this rate through Q2 2025 are related to slips, trips, and falls (2 bone fractures), fall from ladder (2 bone fractures), and a third-party assault (1 head trauma).

SIF investigations have been completed or are underway for the incidents, including any needed corrective actions, and we continue to monitor this trend. In addition, PG&E implemented the SIF Capacity and Learning model[19] described in Section E below.

2. Progress Towards the 5-Year Target

As discussed in Section E below, and in consideration of the metric's trend, PG&E continues to deploy several programs to improve the long-term performance of this metric and to meet the Company's 5-year performance target.

FIGURE 1.1-2
RATE OF SIF ACTUAL (EMPLOYEE)
HISTORICAL PERFORMANCE AND TARGETS



E. (1.1) Current and Planned Work Activities

<u>SIF Capacity & Learning Model</u>: PG&E implemented the SIF Capacity & Learning Model, which redefines safety as measured by the presence of essential controls and the capacity to experience failures safely. Essential controls directly target the energies that can kill or seriously injure a coworker or contract partner. When the essential controls are installed, verified, and used properly, they are not vulnerable to human error. Looking at safety differently

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19 PG&E's SIF Capacity and Learning model incorporates the use of the EEI Safety Classification and Learning (SCL) model methodology for classifying incidents along with building the capacity to safely recover for a complete SIF Prevention Program.

with the SIF Capacity & Learning Model advances how we understand, manage, and prevent serious injuries and fatalities. Since 2024, more than 17,000 frontline workers have been trained on the Energy Wheel, Stuff That Kills You (STKY), and Essential Controls. From July 31, 2024, through July 30, 2025, PG&E recorded an 89% presence of controls in place for high energy hazards, using post-incident analysis and high energy control assessments. PG&E's SCL model has two parts: Capacity and Learning. The Capacity part of the model redefines safety as the presence of controls (versus the absence of incidents), and in order to measure success, meaning essential controls are in place, PG&E adopted a metric called the Workforce Fail Safe Capacity (WFSC). WFSC has two inputs: a post-incident analysis on SIF-A and SIF-P incidents to determine if controls were in place (lagging) and high energy control assessments (leading), which are field observations looking to identify all missing essential controls. In addition to the SIF-Actual internal target, WFSC is PG&E's new internal measurement, with an established internal target. The learning component of PG&E's SCL model is tied to PG&E's Cause Evaluation program, ensuring that lessons learned from incidents are shared across the enterprise. To continue to reduce the quantity and severity of SIF incidents, it is necessary to ensure required controls are in place to build capacity in case of failure, and to continuously improve the Cause Evaluation process, the learning mechanism for all serious incidents.

Human Performance (HU) Tools: PG&E has implemented 10 HU Tools which include: Questioning Attitude, Tailboards and Pre-Job Brief, Situational Awareness, Self-Checking (STAR), Two-Minute Rule, Three-Way Communication, Stop When Unsure, Procedure Use and Adherence, Phonetic Alphabet, and Placekeeping (i.e., physically marking steps in a procedure or other guiding document that have been completed). The HU Tools are deeply connected to the SIF Prevention Program and allow coworkers to slow down, to reduce the chances of human errors caused by internal and external factors. When used effectively, these tools can also help ensure essential controls effectively remain in place and do not break down.

PG&E established an enterprise-wide Safety Week dedicated to Pre-Job Safety Briefings and the use of the HU Tools. In 2025, over five days, employees engaged in daily safety messages, leader-facilitated toolkits, and videos featuring real work situations and examples. A key element of the content was the involvement of employees who perform the work, providing real-time discussions and personal perspectives. Safety Week promoted the importance of HU Tools and continued enterprise-wide alignment.

PG&E's Safety Excellence Management System (PSEMS): PSEMS is the framework for how we systematically manage our processes, assets, and coworker safety to prevent injury and illness. It consists of 13 elements that establish governance and operational requirements for how PG&E operates its business to generate and deliver safe, reliable, affordable, and clean energy for our customers and hometowns. PSEMS is also part of PG&E's Performance Playbook along with Breakthrough Thinking and the Lean Operating Model.

PSEMS follows the Plan, Do, Check, Act cycle of continuous improvement, ensuring processes are evaluated, coursed, and measured annually. A key focus area is Element 5: Operational Control, which ensures that controls are in place to execute work safely. This element is integrated with the SIF Capacity & Learning Model and is operationalized through high energy control assessments and Energy-Based Observations. These field engagements identify and verify controls for high-energy hazards, ensuring coworkers have the ability to fail safely. This is further supported by the Human Performance, which was described earlier in this section. An Assurance Department was established in 2025, aligned with Element 13: Assurance, which is tasked with validating the effectiveness of these essential controls. These integrations strengthen PG&E's safety culture and reinforce the company's commitment to continuous improvement through measurable performance and reduced risk exposure.

Regional Safety Directors: PG&E's team includes a field safety organization led by five Regional Safety Directors who partner with the functional areas (FA)[20] to advise on and facilitate health and safety program implementation and sustainability through the application of best safety practices in each region, and ensure consistency across PG&E.

The safety organization's responsibilities in each region include delivering safety programs for safety culture improvements, field observations and hazard identification, and the evaluation of essential controls for providing co-workers

20 PG&E changed its title from Lines of Business (LOB) to Functional Areas (FA) in 2022.

with the ability or "capacity" to safely recover from a high-energy incident without life-threatening or life altering injury if an error or mistake is made. Additional efforts include supporting incident investigations, training, safety tailboards, and emergency response.

PG&E's SIF Prevention Program: PG&E's SIF Prevention Program focuses on the specific exposures that have led to serious injuries and fatalities. All injuries are investigated and evaluated to ensure essential controls are present. The Functional Area teams conduct in-depth Cause Evaluations for all incidents classified as SIF-A or SIF-P. The results of these investigations are monitored through the Corrective Action Program notification process, created for each event as PG&E develops corrective actions to reduce the likelihood of recurrence. All injuries and reported Near Hits are evaluated to determine the hazards. Functional Area teams actively demonstrate PG&E's SCL model. The teams place an emphasis on analyzing capacity incidents through weekly discussions to identify and apply lessons learned. Each incident is reviewed to determine opportunities for improvement. One of PG&E's metrics for SIF Prevention is WFSC and was previously defined. The WFSC is 89 percent for the last 12 months against a target of 77 percent, which means that in all SIF-A and SIF-P events and in high energy control assessments for the last 12 rolling months, 89 percent of all required controls have been in place for high-energy work. The SIF Prevention program is continuously improved through the annual review of existing program processes for enhancement and optimization. This ensures alignment with all FAs for enterprise-wide consistency and continuity.

Injury Management: The SIF-A (Employee) SOM definition includes injuries that can occur during any work activity (including low or no energy tasks such as lifting, walking, managing tools like knives), which is broader than the high energy incidents that a mature SIF Program focuses on. Therefore, a significant driver for improvement is within our occupational health organization where our OSHA and DART cases are managed. DART cases are employee OSHA-recordable injuries that involve Days Away from work and/or days on Restricted duty or a job Transfer because the employee is no longer able to perform his or her regular job. From 2019 through 2024, there was a 65 percent decrease in the employee DART rate (number of DART cases per 100 fulltime employees divided by number of hours worked). The efforts supporting this reduction include the expansion of PG&E's ergonomic programs and an increased number of Industrial Athlete Specialists for job site evaluations. The primary goal of the efforts is reduced injury severity through injury prevention and early intervention care for employees. In alignment with this, we have strengthened the identification of the highest risk work groups and tasks for field and vehicle ergonomic injuries and implemented risk reduction through ergonomic solutions. We also identify high-risk computer users through predictive modeling and provide targeted interventions. Additional efforts include enhanced injury management training for our people leaders.

Safety Leadership Development in the Field: PG&E's Safety Leadership development in the Field program provides training for crew leaders (i.e., those individuals who lead teams of front-line employees doing field operations and maintenance work) so they have the necessary safety skills to create trust, set expectations, remove barriers to safety and identify and mitigate at risk behaviors.

Safety Observation Program: Safety Observations play a critical role in helping to reduce employee and contractor injuries and fatalities by increasing awareness of hazards and exposures in the field, reinforcing positive work practices, and driving PG&E's Speak-Up culture. The Program includes the use of the SafetyNet observation tool prior to September 1, 2025 and the Mirata observation and reporting tool since September 1, 2025, and the related dashboard to communicate safety successes and improvement opportunities to leadership. Through the first two quarters in 2025, approximately 86,000 co-workers' (i.e., employee) and contractor's safety observations were conducted across PG&E with at-risk findings communicated to the respective FAs.

Effective September 1, 2025, PG&E is moving from the existing behavior based SafetyNet Observation Tool to a new Mirata application focusing on energy-based observations.

For 2024 and through the second quarter of 2025, PG&E continued high energy control assessments as part of the Field Safety Observation program. PG&E's SCL model defines safety through the presence of controls for high energy hazards to assess whether front-line employees are adequately protected against life-threatening hazards. High energy control assessment is computed as the percentage of high-energy hazards that have corresponding essential controls. The WFSC metric is a proportional additive ratio of high energy control assessment exposures (no essential controls in place) and post incident SIF-A and SIF-P exposures (no essential controls in place). The WFSC % is calculated as (Essential Controls in place / WFSC records) * 100 percent. The WFSC target is =/> 77 percent. From 2024 to 2025 the WFSC Percent increased from 49 percent to 89 percent based on a 12-month rolling average.

Transportation Safety: PG&E Transportation Safety programs are designed to protect our employees and the public by establishing requirements and processes to help mitigate risks that can lead to motor vehicle incidents, improve safety performance, and increase awareness of all PG&E employees related to the operation of our motor vehicles. This comprehensive program was established to reduce the number of motor vehicle incidents that have the potential for serious injury, including fatal injury, to PG&E's employees, staff augmentation employees operating vehicles on Company business, and the public. Driver performance data is used to identify specific risk drivers for targeted intervention, including driver training, driver action plans and implementing vehicle safety technology. In addition, PG&E's Transportation Safety Department also ensures compliance with both the Federal Department of Transportation and California state regulations.

A Safe Driving Behavior policy and Driver Scorecard enhancement launched in August of 2023. Since then, 822 Action Plans have been initiated, and 786 Action Plans have been completed through June 2025. The Driver Scorecard was enhanced in October 2024 increasing points for certain types of preventable motor vehicle incidents (PMVI), as well as level of leader review of action plans. Driver points increased for backing and hitting stationary object type PMVIs, not using an available spotter, and not performing a vehicle walkaround. The level of leader review for driver action plans increased by one hierarchical level. In addition, Smith Driving courses are initiated for apprentice and new hires including behind the wheel and close quarter maneuvering courses.

The retrofit of approximately 10 percent of entire owned fleet (984 trouble trucks) with Brigade Backeye 360 Camera System technology with an audible backing sensor and rear distance display. New trouble truck specifications include the 360 camera system technology and the trucks are delivered with the cameras pre-installed. The four high-mounted external cameras eliminate blind spots with an in-cab HD display of front, back and both vehicle sides providing the driver improved visibility to see everything in the vehicle's path.

The retrofit of 656 gas service and electric meter trucks with backup sensor technology features in-cab audible alerts and rear distance display. The backup sensors alert the driver of objects in the vehicles blind spot while backing to enhance safety. New gas service and electric meter truck specifications include the backup sensor technology and the trucks are delivered with the sensors installed.

PG&E's motor vehicle safety performance through mid-year 2025 is in the first quartile, which has been enabled by motor vehicle technology, addition of controls, and continued driver training for apprentices and new hires.

PG&E's continued focus on eliminating SIF incidents has resulted in measurable progress, with improvement in the first half of 2025 compared to the same period in 2024. With the core tenet of the SCL model, training over 17,000 frontline workers on the Energy Wheel, STKY, and Essential Controls, and engaging directly with the employees performing the work, the company demonstrates the importance of ensuring effective controls are in place. Collaborative efforts across programs and departments allow PG&E to capture lessons learned, strengthen safety practices, and advance a culture of enterprise-wide Human Performance.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 1.2

RATE OF SIF ACTUAL

(CONTRACTOR)

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
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PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 1.2
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(CONTRACTOR)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (1.2) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 1.2 – Rate of Serious Injury and/or Fatality (SIF) Actual (Contractor) is defined as:

Rate of SIF Actual (Contractor) is calculated using the formula: Number of SIF-Actual cases among contractors x 200,000/contractor hours worked, where SIF-Actual is counted using the methodology developed by the Edison Electrical Institute's (EEI) Occupational Safety and Health Committee (OS&HC).

2. Introduction of Metric

Pacific Gas and Electric Company's (PG&E or the Company) safety stand is "Everyone and Everything is Always Safe." Nothing is more important than our goal of continued risk reduction to keep our customers, and the communities we serve as well as our workforce (employees and contractors) safe. PG&E employees and contractors must understand that their actions reflect this priority. Our safety culture begins with each of us individually and extends to our coworkers and our communities. As part of this stand, PG&E is committed to contractor safety.

As defined in Decision (D.) 21-11-009, the Contractor SOM calculation is applied to PG&E's existing injury and SIF dataset. The data were analyzed and reported under this definition beginning with the first report which was submitted in March of 2022.

The EEI's OS&HC has oversight over the SIF Criteria, which are reviewed annually and updated based on additional learnings from injury classification to provide further clarification or criteria for the following year.

The EEI SIF Criteria were revised and published in 2024. PG&E began using the revised EEI SIF Criteria effective January 1, 2025.[1]

PG&E uses the 2025 EEI SIF Criteria found in Appendix 9 of the EEI Safety Classification and Learning (SCL) Model guidance.[2] The criteria include:

1) Fatalities;
2) Amputations (involving bone) excludes distal phalanx;
3) Head trauma that results in a traumatic brain injury, intracranial bleeding, or loss of consciousness for greater than 30 minutes;
4) Injury or trauma to vital organs to include brain, spinal cord, heart, lungs, kidneys, liver, spleen, large and small intestine, and stomach;
5) Bone fractures requiring surgery for repair (pins, rods, screw, plates, wires, etc.) excludes fingers and toes;
6) Acute traumatic herniated disc with neurologic deficit – sensory or motor;
7) 2nd degree burn (10 percent body surface); 3rd degree burn (5 percent of body surface); or 3rd degree burn requiring skin graft;
8) Eye injuries resulting in permanent vision loss or change in vision;
9) High pressure injection injuries requiring surgical debridement and irrigation;
10) Heat Stroke;
11) Dislocation of the hip, elbow, or knee;
12) Electrical contact injuries;
13) Vascular trauma requiring surgery;
14) Acute chemical or radiological exposure resulting in injury to vital organs to include brain, spinal cord, heart, lungs, kidneys, liver, spleen, large and small intestine, and stomach; and
15) Other injuries.

PG&E's SIF Prevention Program was deployed at the end of 2016 to establish a cause evaluation process for coworker serious safety incidents. When it was deployed, only contractor incidents that resulted in a SIF Actual

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1 EEI Serious Injury and Fatality (SIF) Criteria.

2 EEI SCL model guidance. EEI SIF Criteria are in Appendix 9. SCL model guidance.

(fatality or serious injury that was defined as life threatening or life altering) were investigated by PG&E and entered into the Corrective Action Program (CAP). The contractor was responsible for investigating all other incidents and reporting back to PG&E, but those incidents were not entered into CAP.

From 2017 to 2020, PG&E classified SIF Actual (SIF-A) incidents based on the job task and whether a life altering or life-threatening injury, or fatality occurred. In August of 2020, PG&E adopted EEI's SCL Model[3] to classify its SIF incidents. The EEI SCL model classifies incidents into categories: High-Energy SIF (HSIF),[4] Low-Energy SIF (LSIF),[5] Potential SIF (PSIF),[6] Capacity,[7] Exposure,[8] Success[9] and Low Severity.[10] PG&E adopting the EEI SCL model has improved the SIF Program by bringing a consistent and objective approach to reviewing and classifying SIF incidents across the Company and industry. The EEI SCL model allows the Company to focus its safety and risk mitigation efforts on the most serious outcomes and highest risk work where a high energy incident occurred. In addition, in June of 2020 PG&E modified the SIF Program to include internal classification and investigation of contractor SIF Potential (SIF-P) incidents.[11] This expanded requirement led to an increase in contractor injury data.

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3 EEI SCL Model available here: https://www.safetyfunction.com/scl-model.

4 *Id.* at p. 19, HSIF is defined as: "Incident with a release of high energy in the absence of a direct control where a serious injury is sustained."

5 *Id.* at p. 19, LSIF is defined as: "Incident with a release of low energy in the absence of a direct control where a serious injury is sustained."

6 *Id.* at p. 19, PSIF is defined as: "Incident with a release of high energy in the absence of a direct control where a serious injury is not sustained."

7 *Id*. at p. 19, Capacity is defined as: "Incident with a release of high energy in the presence of a direct control where a serious injury is not sustained."

8 *Id.* at p. 19, Exposure is defined as: "Condition where high energy is present in the absence of a direct control."

9 *Id.* at p. 19, Success is defined as: "Condition where a high energy incident does not occur because of the presence of a direct control."

10 *Id.* at p. 19, Low Severity is defined as: "Incident with a release of low energy where no serious injury is sustained."

11 SAFE-1100S-B001 bulletin previously noted was retired. References now include GOV-6102S, "Enterprise Cause Evaluation Standard", and SAFE-1100S, "Serious Injury and Fatality (SIF) Standard."

The rate of SIF-A (Contractor) SOM definition is based on the EEI SIF Criteria.[12]

3. Audit Results

In the Audit Report, Metric 1.2 received a Metric Accuracy Finding of "Minor."[13] The finding for this metric was due to a discrepancy in the 2023 mid-year report contractor hours and incident count due to differences in the ISNetworld (ISN) data and changes resulting from PG&E's Quality Assurance/Quality Control process.[14] The findings have been resolved.

The corrections implemented include the following: correction of the 2023 contractor hours for the months of January through June of 2023 as follows; January from 4,172,820 to 4,245,947; February from 3,987,163 to 4,043,995; March from 4,616,137 to 4,684,560; April from 4,822,905 to 3,979,729; May from 5,188,900 to 4,204,195; June from 5,285,016 to 4,211,909. Additionally, the number of Contractor SIF Actual incidents for the first half of 2023 was corrected in the 2023 SOMs year-end report from 15 to 16 incidents. The percentage of bone fracture incidents was also subsequently updated from 52 percent to 51 percent. These updates are reflected in this report filing.

B. (1.2) Metric Performance

1. Historical Data (2017-2024)

PG&E includes historical data for the years 2017 through 2024 in this report. The dataset includes injury type, incident date, location, and EEI SIF Criteria classification. See the corresponding Contractor SIF-A SOM data file for a list of incidents. Following the Kern Order Instituting Investigation (OII) Settlement Agreement (SA),[15] PG&E deployed the SIF Program to investigate employee and contractor incidents resulting in life altering, life threatening, or fatal injuries. Beginning in 2017, PG&E only tracked

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12 EEI Serious Injury and Fatality (SIF) Criteria, effective January 1, 2025.

13 Audit Report, p. 8, Table 1-1.

14 Audit Report, p. 20 (Verification of Contractor Hours) and p. 21 (Verification of Contractor SIF Actual).

15 Investigation 14-08-022, Kern OII (Aug. 28, 2014) SA with California Public Utilities Commission (CPUC) see D.15-07-014.

contractor incidents that were classified through the SIF Prevention Program[16] meeting those criteria. Prior to the implementation of the Kern OII requirements, contractors were not required to report SIF incidents. In June 2020, PG&E expanded the SIF Prevention Program to include investigating contractor incidents rising to SIF-P classification (focusing on incidents that meet the EEI SCL model as described above). This increased the number and types of injuries and incidents that contractors are required to report[17] compared to prior years.[18] For 2020 through 2024, the dataset reflects the expanded SIF-P incident reporting requirements for contractors implemented in June of 2020.[19] From 2017 through 2024 there are a total of 82[20] contractor SIF Actuals that met the EEI SIF Criteria. Out of the 82 contractor SIF Actuals, 14 resulted in fatalities and 68 resulted in serious injury incidents. Out of the 68 serious injuries 65 percent (44 of 68) met the EEI SIF Criteria of bone fracture, including of the hands, knee, arm and feet. Of the 14 fatalities, one helicopter crash in 2020 claimed the lives of three individuals; the other fatalities involved an act of a third party, falls from trees, electrical pole gas pipe placement, and operations of motor and powered vehicles.

Figure 1.2-1 illustrates the rate of contractor serious injuries and fatalities for historical data from 2017 through 2024.

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16 SAFE-1100S Rev. 08 (2025) SIF Standard.

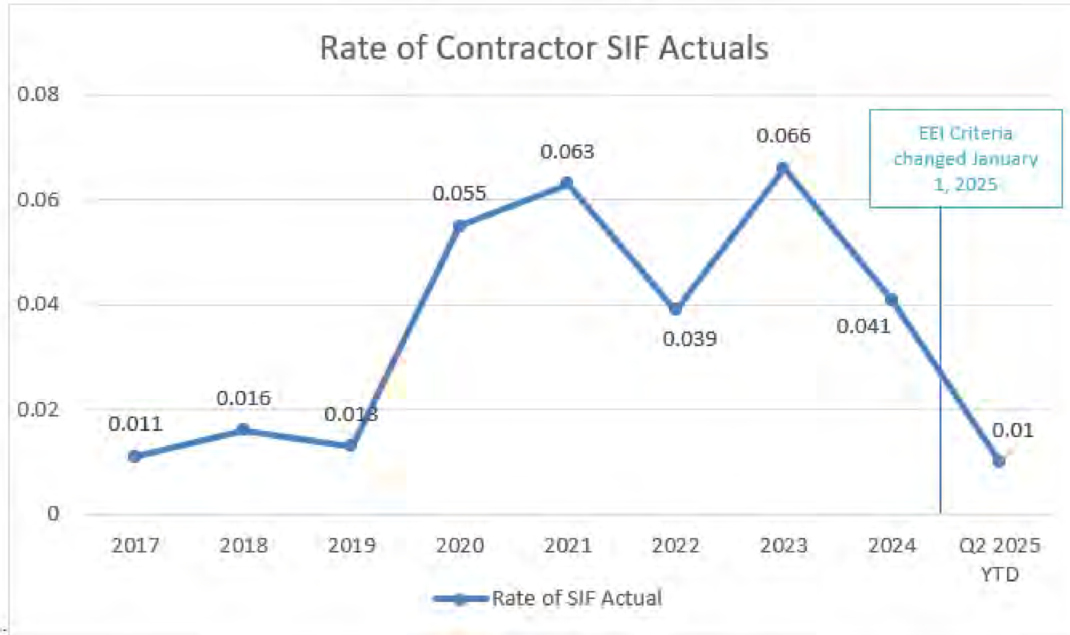
17 SAFE-1100S-B001 bulletin previously noted was retired. Reference includes GOV-6102S, “Enterprise Cause Evaluation Standard.”

18 Note, the expanded incident reporting requirement implemented in 2020 does not include the broader SOM SIF-A (Contractor) EEI SIF Criteria metric definition.

19 SAFE-1100S, “Serious Injury and Fatality (SIF) Standard.

20 The total contractor SIF Actual count of 82 includes one incident resulting in 3 fatalities. While 80 incidents occurred, the three fatalities in a single incident bring the count to 82.

FIGURE 1.2-1
RATE OF SIF ACTUAL (CONTRACTOR)
HISTORICAL PERFORMANCE



Note: Following 2023 labor hour adjustment, Figure 1.2-1 reflects the revised rate, corrected from 0.063 to 0.066.

2. Data Collection Methodology

Contractor related Serious Safety Incidents[21] or any SIF-A or SIF-P incidents are reported to the Safety Helpline at Company number 1-415-973-8700, Option 1 and then entered into the Enterprise CAP program for SIF review and classification.[22] PG&E's SIF Program[23] is managed through the CAP.

As mentioned above, the SIF-A (Contractor) SOM as defined in D.21-11-009 SOM calculation is applied to PG&E's existing injury and SIF dataset, and 2022 was the first year in which the data were analyzed and reported under this definition. To evaluate and establish historical

[21] As defined by SAFE-1004S: Safety Incident Notification and Response Management.

[22] SAFE-1100S-B001 bulletin previously noted was retired. Now reference GOV-6102S, "Enterprise Cause Evaluation Standard." PG&E contractors are required to submit any Serious Safety Incidents or PSIF incidents to PG&E within 5-business days of becoming aware of the incident.

[23] SAFE-1100S: SIF Standard determined SIF classification and management.

performance for the SOM SIF-A (Contractor) metric, PG&E pulled data from the CAP system and reviewed 472 issues with the Issue Type of Contractor Safety. The list included both incidents or injuries reported to PG&E or entered in CAP from 2017 through 2021. Twenty-seven percent, or 128 incidents, were related to gas dig-in by a third-party where no injuries occurred. The remaining issues were reviewed to determine if any met the 14 EEI SIF Criteria as summarized in Section A.2. above. For the years 2022 through Q2 2025, the same process was used to review Contractor Safety related CAPs entered on a monthly basis. A total of 368 contractor related CAPs were reviewed in 2022, 343 were reviewed for 2023, and 742 reviewed in 2024. A total of 302 contractor related CAPs were reviewed through Q2 of 2025.

3. Metric Performance for the Reporting Period

Figure 1.2-1 also illustrates the rate of contractor serious injuries from January 1, 2025, through June 30, 2025. The Q2 2025 year-to-date SIF rate of 0.01[24] reflects a decrease from the 2024 year-end rate of 0.041, as well as a decrease compared to the target rate of 0.10.

Through the first half of 2025, one contractor SIF Actual met the EEI SIF Criteria. The incident involved a serious injury resulting in the amputation of fingers. PG&E has not experienced a PG&E contractor fatality for 906 days, from January 7, 2023, through June 30, 2025.

PG&E's current and planned work activities for improving the long-term performance of this metric are discussed in Section E below.

All the incidents involved a high-energy event and were classified as either SIF-A (HSIF) or SIF-P (PSIF) per the EEI SCL model and PG&E's SIF Standard.

Performance through 2025 against target is further discussed in Section D.1 below.

24 Since the beginning of 2025 the rates were updated from 3 to 2 decimal places. The prior years were left unchanged with the rates at 3 decimal places.

C. (1.2) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

There have been no changes to the 1- and 5-year targets since the last SOMs report filing. As mentioned above, the rate of Contractor SIF-A dataset includes the expanded SIF-P incident reporting requirements for contractors implemented in June of 2020. Additionally, as was identified and closed out as part of the FEP audit, the process to gather and validate accurate contractor hours has improved, and PG&E is working to ensure continued data fidelity prior to updating targets. We will continue to monitor Contractor SIF-A trends and adjust the targets once the dataset has matured, including internal targets that are driving improved performance. We are establishing a baseline on the new criteria before adjusting targets. Additionally, PG&E has internal targets that are more restrictive than these targets and are being used to drive SIF performance.

2. Target Methodology

To establish the 1-year and 5-year target thresholds, PG&E considered the following factors:

- Historical Data and Trends: The target threshold takes into consideration the historical increase (from 0.013 to 0.063) between 2019, 2020 and 2021, after expanding the contractor reporting requirements in 2020. This increased the amount and rate of contractor serious injuries (as defined by the EEI SIF Criteria) by over 466 percent. It also takes into consideration that in 2022 PG&E expanded contractor injury reporting requirements to meet the EEI SIF Criteria;
- Benchmarking: Not available for EEI SIF Criteria effective January 1, 2025. PG&E confirmed that EEI is collecting these data among its utility members and hopes to increase benchmarking capability as more utilities begin to track contractor incident data. For establishing the SOM 1.2: SIF-A (Contractor) target threshold PG&E used the industry data that were available as a proxy to establish approximate calculations. PG&E will continue to refine its targets as benchmarking data becomes available.
- Regulatory Requirements: None;

- Attainable Within Known Resources/Work Plan: Yes. The main focus for driving down injuries is noted below in planned/future work related to Contractor Safety initiatives;
- Appropriate/Sustainable Indicators: While the performance at or below the target may be sustainable, the more appropriate metric is to focus on injuries resulting from a high energy incident, which is consistent with both industry SIF-A monitoring and the Standard Practice Manual; and
- Other Qualitative Considerations: This target approach was established to account for all job-related tasks with the potential to cause injury as defined by the EEI SIF Criteria.

3. 2025 and 2029 Target

The 2025 (1-year) and 2029 (5-year) target thresholds are to maintain a rate of less than 0.10. This target rate takes into consideration the historical increase (from 0.013 to 0.063) from 2019 through 2021 after expanding the contractor reporting requirements in 2020. It also considers that in 2022 PG&E expanded contractor injury reporting requirements to meet the SOM SIF-A (Contractor) as defined by the EEI SIF Criteria and that the rates are subject to change depending on the number of contractors hours worked.

The target thresholds are set at the highest serious injury occurrence in one year that would be concerning if the rate was surpassed. Since 2022 was the first year the metric calculation was reported, the threshold takes into consideration historical data from 2020 and 2021 with an allowance for understanding this calculation and its consequences. The threshold allows for a 50 percent rate increase over 2021, which allows PG&E to refine expectations as this new metric is refined further.

D. (1.2) Performance Against Target

1. Progress on Sustaining the 1-Year Target

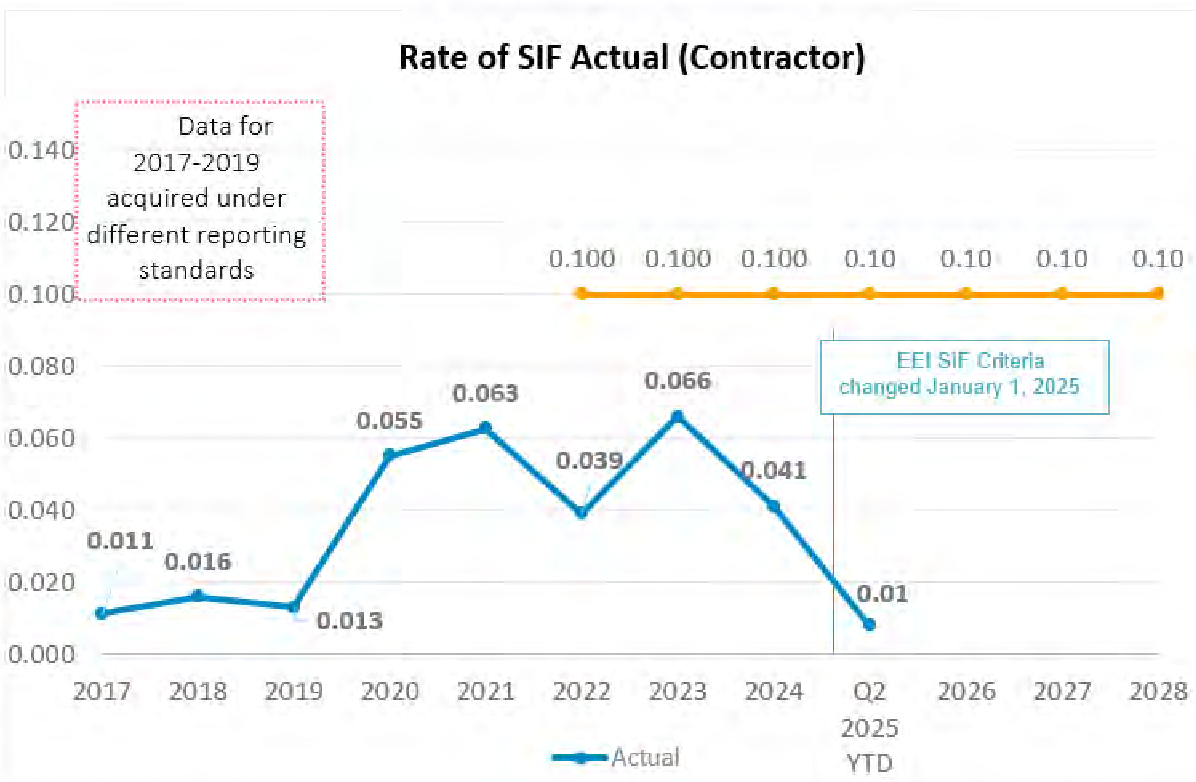
As demonstrated in Figure 1.2-2 below, in the first half of 2025, the Contractor SIF Actual rate of 0.01 was a slight decrease compared to the same period in 2024. The contractor serious injury that contributed to this rate through Q2 2025 resulted from a fall while caught in-between material (i.e., throwline, 1 distal phalanx finger amputation).

SIF investigations have been completed or are underway for the incidents including corrective actions and we are continuing to monitor this trend. In addition, PG&E implemented the SIF Capacity and Learning Model[25] as described in Section E below.

2. Progress on Sustaining the 5-Year Target

As discussed in Section E below, PG&E continues to deploy a number of programs to improve the long-term performance of this metric to meet the Company's 5-year performance target and will continue to monitor Contractor SIF-A trends and adjust the targets as appropriate.

FIGURE 1.2-2
RATE OF SIFA (CONTRACTOR)
HISTORICAL PERFORMANCE AND TARGETS



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25 PG&E's SIF Capacity and Learning model incorporates the use of the EEI Safety Classification and Learning (SCL) model methodology for classifying incidents, along with building the capacity to safely recover for a complete SIF Prevention Program.

E. (1.2) Current and Planned Work Activities

- SIF Capacity and Learning Model: PG&E has implemented its SIF Capacity and Learning Model, which redefines safety as measured by the presence of essential controls and the capacity to experience failures safely. Essential controls directly target the stuff that can kill or seriously injure a co-worker or contract partner. When the controls are installed, verified, and used properly, they are not vulnerable to human error. Looking at safety differently with the SIF Capacity and Learning Model advances how we understand, manage, and prevent serious injuries and fatalities. Instead of measuring our success by the number of incidents, we are defining safety by the presence of essential controls that give coworkers and contractors the ability to fail safely. PG&E's SIF Capacity and Learning Model has two parts: Capacity and Learning. The Capacity part of the model redefines safety as the presence of controls, and in order to measure success, meaning controls are in place, PG&E adopted a metric called the Workforce Fail Safe Capacity (WFSC). WFSC has two inputs: a post-incident analysis on SIF-A and SIF-P incidents to determine if controls were in place (lagging) and high energy control assessments (leading), which are field observations to identify if any required controls are missing. In addition to the SIF-Actual internal target, WFSC is PG&E's new internal measurement with an established internal target. The Learning part of the SIF Capacity and Learning Model is tied to PG&E's Cause Evaluation program, ensuring that lessons learned for incidents are shared across the Enterprise. To continue to reduce the quantity and severity of SIF incidents, it is necessary to ensure required controls are in place to build capacity in case of failure and to continuously improve the Cause Evaluation process, the learning mechanism for all serious incidents.
- Human Performance (HU) Tools: PG&E has implemented the 10 HU Tools which include: Questioning Attitude, Tailboards and Pre-Job Brief, Situational Awareness, Self-Checking, Two-Minute Rule, Three-Way Communication, Stop When Unsure, Procedure Use and Adherence, Phonetic Alphabet, and Placekeeping (i.e., physically marking steps in a procedure or other guiding document that have been completed). The HU Tools are deeply connected to the SIF Prevention Program and allow

coworkers to slow things down and reduce the chances of human errors caused by internal and external factors. When used effectively, these tools can also help ensure essential controls effectively remain in place and do not break down.

PG&E established an enterprise-wide Safety Week dedicated to Pre-Job Safety Briefings and the use of the HU Tools. In 2025, over five days, employees engaged in daily safety messages, leader-facilitated toolkits, and videos featuring real work situations and examples. A key element of the content was the involvement of employees who perform the work, providing real-time discussions and personal perspectives. Safety Week promoted the importance of HU Tools and continued enterprise-wide alignment.

- Contractor Safety Quality Assurance Reviews (CSQAR): CSQARS are conducted with selected Contractors with adverse trends in safety performance and who are at risk of experiencing a Serious Injury or Fatality, as well as for all new contractors when they begin performing work on behalf of PG&E. This applies both to contractors new in business and those new to PG&E. PG&E utilizes its third-party administrator, ISN, to facilitate these CSQARs. The purpose is to partner directly with our contract partners, perform a comprehensive review of their safety programs and culture, and implement controls to eliminate serious injuries and fatalities. The contractors participate in a 6-week examination of their safety culture within their company where opportunities are identified, the company undergoes a barrier analysis, and corrective actions are designed and implemented. Following the successful completion of the initial six weeks, PG&E checks in with contractors every 30 days for a minimum of three months to conduct an Effectiveness Review to ensure the corrective actions were implemented as designed, were effective and self-sustaining, and do not expose employees to unforeseen hazards. As of Q2 2025 year-to-date, 203 CSQARs had been completed with only one contractor experiencing a SIF-P post-CSQAR and one experiencing a SIF Actual post-CSQAR.

  In April 2025, PG&E enhanced the CSQAR process by including CultureSight® through Monarch, a consulting arm of ISN. The process is now Review and Verification Services 360™ (RAVs360). CultureSight® is a data-driven safety culture assessment tool. It functions as an anonymous electronic survey designed to capture contractors' perceptions of PG&E culture. It gathers feedback on critical safety-culture dimensions like leadership alignment, risk awareness, communication and continuous improvement. Respondents' feedback is analyzed and benchmarked against peer utilities to highlight strengths, opportunities, and potential risks. The insights gathered are then shared enterprise-wide. In addition to contractors with adverse safety trends, in Q3 2024, PG&E began partnering with ISN, PG&Es third-party administrator, to facilitate CSQARs for all new contractors (prime and subcontractors) when they begin performing work on behalf of PG&E. This includes contractors new in business, as well as contractors new to PG&E.

- <u>Contractor Motor Vehicle Programs</u>: In March of 2023, PG&E implemented the "Slow Your Roll" campaign focusing on preventing motor vehicle rollovers with a breakthrough goal of 100 Consecutive Days of Rollover Free Driving. At the time, PG&E was averaging 16 days between rollovers. Later that same year, 100 consecutive days rollover free was reached. In 2024, PG&E observed a reduction in success, averaging approximately one rollover per month with only 64 consecutive days rollover free, therefore, utility standard SAFE-3002S, "PG&E's Contractor Motor Vehicle Safety Standard" was developed and implemented. This standard includes phone-free requirements, including hands-free devices, as well as requiring criterion adopted from American National Standards Institute/American Society of Safety Engineers Z15.1 – 2017: Safe Practices for Motor Vehicle Operations. The intent is to assist contract partners in defining and developing effective driving safety and risk management programs. To support these efforts, Functional Areas (FA) are required to define and track specific Key Risk Indicators within their contractor management procedures. FAs are required to take actions to improve KPI performance, where applicable.
- <u>PG&E's Contractor Safety Program</u>: Programs that support this metric include PG&E's Enterprise Health and Safety organization, specifically the Enterprise Contractor Safety Program. Beginning in 2016, PG&E implemented a formal Contractor Safety Program to help our contractor partners reduce illness and injuries when working with PG&E. The program

was implemented as required by the CPUC, Kern OII SA. PG&E's Contractor Safety Program includes all contractors and subcontractors (currently over 2,160) performing high and medium-risk work on behalf of PG&E, on either PG&E owned, or customer owned, sites and assets. The Contractor Safety Program consists of the following primary elements:

– Contractor Company Pre-Qualification: PG&E leverages the capabilities of ISN to collect performance and safety compliance program information from all prime and subcontractors that conduct work classified as high or medium risk. PG&E is responsible for the performance of its contractors. As part of this effort, ISN, a third-party administrator, independently assesses contractors' historical safety data, safety, drug/alcohol, and written safety programs to evaluate whether contractors meet PG&E's minimum performance standards and have the necessary risk management programs in place to proactively mitigate risk. A variance to work for PG&E is required for contractors who do not meet the prequalification requirements. The variance process includes a review of the contractor's safety performance, an improvement plan and the business need in relation to the proposed scope of work. The decision to award a variance requires Vice President and Chief Safety Officer approval, or Chief Executive Officer designee approval.

– Enhanced Safety Contract Terms: PG&E Contract terms require that, following a serious public or worker safety incident, the contractor will conduct a cause evaluation, share the analysis with PG&E, and cooperate and assist with PG&E's cause evaluation analysis and corrective actions for the incident, and regulatory investigations and inquiries, including but not limited to Safety Enforcement Division's investigations and inquiries. Under the enhanced Safety Contract Terms, PG&E has the right to:

  1) Designate safety precautions in addition to those in use or proposed by the contractor;
  2) Stop Work to ensure compliance with safe work practices and applicable federal, state and local laws, rules and regulations;

3) Require the contractor to provide additional safeguards beyond what the contractor plans to utilize;
4) Terminate the contractor for cause in the event of a serious incident or failure to comply with PG&E's safety precautions;
5) Review and approve criteria for work plans, which include safety plans; and
6) Require the contractor to promptly, thoroughly, and transparently investigate all safety incidents that occur during Contractor's PG&E related work in compliance with PG&E's Enterprise Cause Standard, including all SIF-A and SIF-P incidents, which shall be investigated jointly with PG&E, taking into account the priority and needs of Occupational Safety and Health Administration and other regulator investigations.

- Contractor Job Safety Planning: Safety must be factored into every job plan from start to finish. Safety considerations include formal training, job site work controls, specialized equipment to reduce hazards, and personal protective equipment. Each of PG&E's FAs have safety plan requirements unique to its operations. Prior to commencement of work, PG&E is required to review the adequacy of the safety plans, including contractor safety personnel qualifications where applicable, and perform a safety assessment to evaluate whether additional safety mitigations are required, including whether to assign PG&E onsite safety personnel. These reviews must be conducted by PG&E employees that are qualified to perform such work or PG&E engages third-party experts as appropriate to perform this safety analysis.
- Contractor Oversight: Work activities are governed by qualified PG&E oversight personnel to ensure work follows a PG&E reviewed and approved safety plan designed for the job. PG&E conducts field safety observations of the contractor. Approximately 60,000 contractor observations were conducted during the first half of 2025. High-risk findings are reviewed daily, and corrective actions are discussed. Observation data collected by all observers (e.g., PG&E and contractors) are analyzed to support continuous improvement.

- Contractor Safety Performance Evaluation: To maximize and capture lessons learned, the results of which are shared across the enterprise, as well as providing a means of determining future contract award, FA Representatives evaluate contractor safety performance. Prime Contractors must also evaluate all Subcontractors performing any active work during the year. Evaluations must be completed at the conclusion of the contracted work or at least once every calendar year. Safety performance evaluations must include the following minimum performance evaluation criteria:
  a) Worksite hazard mitigation;
  b) Training and qualifications compliance;
  c) Work site safety performance (observations);
  d) Safety incident and injury prevention and reporting;
  e) Development and implementation of a PG&E-approved safety plan;
  f) Speak Up and Stop Work Authority; and
  g) Wildfire Prevention and Mitigation.

PG&E continues to advance its programs aimed at eliminating SIF incidents, which is evident by an improvement of .50 for SIF Actuals and .66 for SIF Potentials through Q2 2025. A core tenant of the PG&E's SCL model is that safety is measured not by the absence of events, but by the presence of effective controls. As part of this approach, contractors are required to lead their own cause evaluations and together, we identify what happened, what could have happened and what barriers failed and worked. This approach captures learning opportunities and drives improvements. Together with our contractors, we remain dedicated to systemic learning from every event to build defenses before tragedies happen.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 1.3

SIF ACTUAL

(PUBLIC)

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
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PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 1.3
SIF ACTUAL
(PUBLIC)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (1.3) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 1.3 – Serious Injury and Fatality (SIF) Actual (Public) is defined as:

A fatality or personal injury requiring inpatient hospitalization for other than medical observations that an authority having jurisdiction has determined resulted directly from incorrect operation of equipment, failure or malfunction of utility-owned equipment, or failure to comply with any California Public Utilities Commission (CPUC or Commission) rule or standard. Equipment includes utility or contractor vehicles, and aircraft used during the course of business.

2. Introduction of Metric

Pacific Gas and Electric Company's (PG&E or the Company) safety stand is "Everyone and Everything is Always Safe." Our goal is zero public safety incidents resulting from the failure or malfunction of a PG&E asset or from PG&E's failure to follow rules and/or standards. In support of this, PG&E is continuing to invest in programs that protect the public, including Electric Transmission (ET) and distribution system reliability and the reduction of wildfire risk. PG&E remains committed to building an organization where every work activity is designed to facilitate safe performance, every member of our workforce knows and practices safe behaviors, and every individual is encouraged to speak up if they see an unsafe or risky behavior with the confidence that their concerns and ideas will be heard and followed up on. As part of this stand, the Public SIF Actual metric is integral in ensuring the safety of our communities.

The Public SIF Actual Metric definition established in Decision (D.) 21-11-009 is a different way for PG&E to categorize and report public safety incidents resulting in a SIF. There are two primary differences between the SOMs Public SIF Actual Metric and the Safety Performance Metric (SPM) Public SIF Metric (SPM Metric 20).

- First, the SOM requires a finding by "an authority having jurisdiction;" and
- Second, that finding must determine that the Public SIF Actual:

> …resulted directly from incorrect operation of equipment, failure or malfunction of utility owned equipment, or failure to comply with any California Public Utilities Commission (CPUC or Commission) rule or standard.[1]

As a result, the data in this report represent a subset of the data included in the SPM Report for the Public SIFs metric, which is defined as a fatality or personal injury requiring in-patient hospitalization involving utility facilities or equipment. Equipment, in the case of the SPM, includes utility vehicles used during the course of business.

In 2012, PG&E improved its data collection processes and reporting for public serious incidents. These data were used to inform PG&E's Risk Assessment and Mitigation Phase Report, which informs and helps prioritize our investments to address top safety risks. The report outlines our top safety risks and includes descriptions of the controls currently in place, as well as mitigations—both underway and proposed—to reduce each risk.

3. Audit Results

In the Audit Report, Metric 1.3 received a Metric Accuracy Finding of "None." There were no Other Findings for this metric.[2]

B. (1.3) Metric Performance

1. Historical Data (2010 – 2024)

In this report, PG&E is providing 15 years of historical data from 2010 through 2024. The graphs included in Figure 1.3-1 and Figure 1.3-2 below show the total number of incidents and the total number of serious injuries or

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[1] D.21-11-009 – (Rulemaking 20-07-013) Appendix A, p. 2.

[2] Audit Report, p. 8, Table 1-1.

fatalities for each identified incident. Between 2010 through 2024, there were 30 confirmed incidents where Public SIF Actuals occurred (Figure 1.3-1), which resulted in a total of 176 Public SIFs (Figure 1.3-2). There are two incidents related to wildfire where a serious injury or fatality to a member of the public occurred that are shown as “unknown” due to ongoing investigation and/or litigation. In addition, an incident that occurred on December 12, 2024, and was received by the Claims Department on July 29, 2025, remains pending while the investigation is ongoing.

The data include a description of the incident, the type of injury, and identification of the authority with jurisdiction that has determined, or may determine, that incorrect operation, malfunction, or failure to meet a standard was the cause of the SIF. As mentioned above, the data collection and internal reporting processes for public safety serious incidents were improved in 2012. Historical data for the Public SIF Actual Metric are based on this timeframe and also include available data for the years of 2010 and 2011.

Since the metric definition requires a finding from an authority having jurisdiction, Public SIF Actual incidents in prior years may not appear in the historical data. For the purposes of this report, PG&E is including incidents where PG&E may have disputed the assertion of an authority with jurisdiction that the Public SIF Actual was caused by incorrect operation of utility equipment, a malfunction of utility equipment, or failure to comply to a Commission rule or standard, and/or where the incidents are subject to pending investigation or litigation. These incidents are shown as “unknown or pending” in the corresponding metric data file. PG&E will continue to update the historical data in future SOMs reports as appropriate and identify changes based on new information.

2. Data Collection Methodology

PG&E’s Public SIF Actual incident data largely come from the Enterprise Health and Safety Serious Incidents Reports, which includes a compilation of Law Department claims from PG&E’s Riskmaster database, Electric Incident Reports, and other reportable incidents such as PG&E Federal Energy Regulatory Commission (FERC) license compliance reports. For the SOMs report, the incidents included in the Public SIF Actual Metric must be determined by an authority having jurisdiction to have resulted directly from: (1) incorrect operation of equipment, (2) failure or malfunction of utility-owned equipment, or (3) the failure to comply with any Commission rule or standard. PG&E interprets authorities having jurisdiction to include agencies such as the CPUC, California Department of Forestry and Fire Protection, or the National Transportation Safety Board. The term authority having jurisdiction can also include PG&E itself if PG&E concludes that the definition of the SOM is met.

3. Metric Performance for the Reporting Period

The graphs included in Figure 1.3-1 and Figure 1.3-2 also show zero confirmed public incidents through the first half of 2025.

There have been no confirmed Public SIF incidents through Q2 2025; however, there is 1 pending Public SIF incident in 2025 that occurred on 3/8/2025 and the investigation is ongoing.

FIGURE 1.3-1
NUMBER OF PUBLIC SIF ACTUAL INCIDENTS 2010 – Q2 2025
CONFIRMED AND PENDING INVESTIGATION

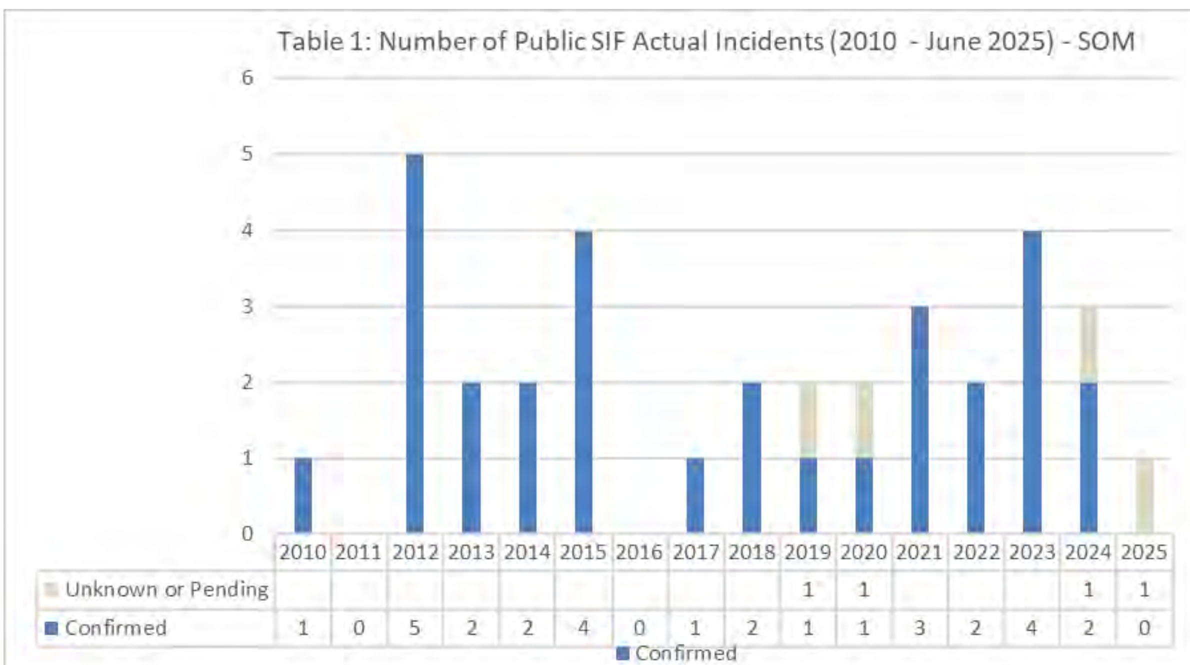
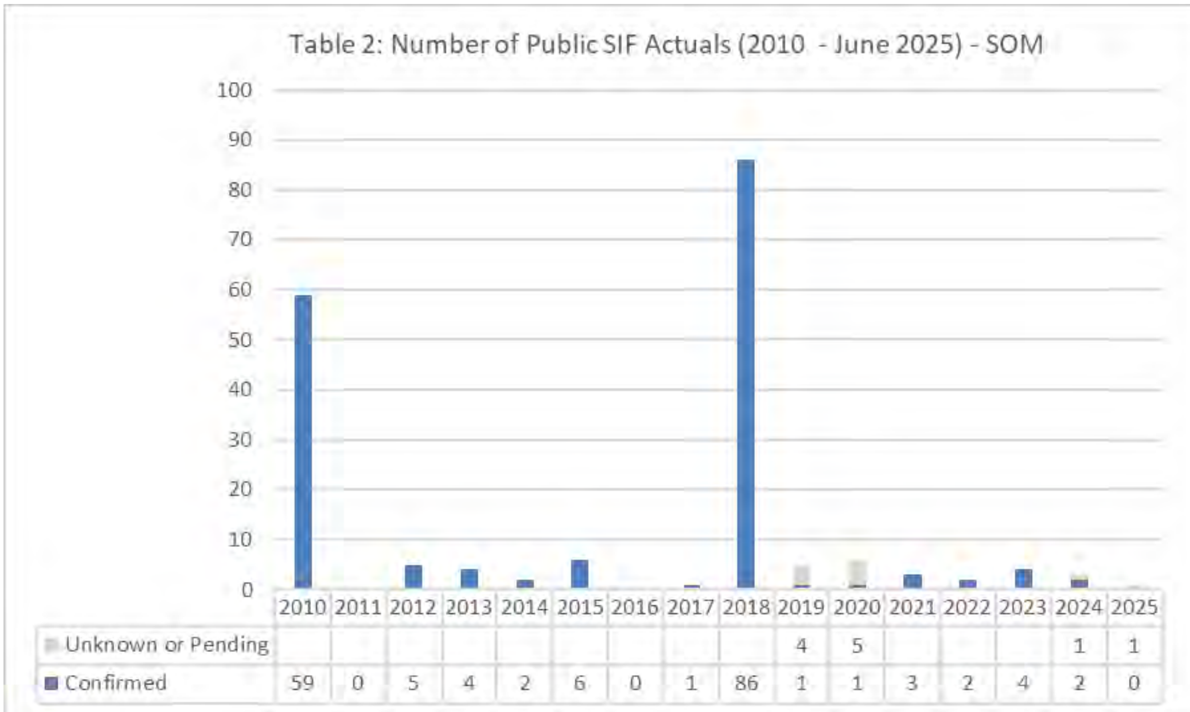


FIGURE 1.3-2
NUMBER OF PUBLIC SIF ACTUALS 2010 – Q2 2025
CONFIRMED AND PENDING INVESTIGATION



	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Unknown or Pending										4	5				1	1
Confirmed	59	0	5	4	2	6	0	1	86	1	1	3	2	4	2	0

PG&E continues to evaluate its current and planned public safety work activities, as described in Section E below, and through further maturing its public incident investigation process. This includes the advancement of Public SIF Actual Metric definition requirements and learnings.

C. (1.3) 1-Year Target and 5-Year Target

1. Updates to 1- and 5- Year Targets Since Last Report

There have been no changes to the 1-year and 5-year targets since the last SOMs report filing for the Public SIF Actual metric, which is to demonstrate progress toward eliminating serious injuries and fatalities (zero Public SIF Actual incidents).

2. Target Methodology

With our stand of Everyone and Everything is Always Safe, our goal is the elimination of Public SIF Actual incidents resulting directly from incorrect operation of PG&E equipment, the failure, or malfunction of PG&E-owned equipment, or from PG&E's failure to comply with any Commission rule or standard.

In consideration of the above, PG&E also reviewed the following factors:

- Historical Data and Current Reporting Period Trends: From 2010 through the first half of 2025, there were a total of 30 confirmed incidents where Public SIF Actuals occurred (Figure 1.3-1), which resulted in a total of 176 public SIFs (Figure 1.3-2). There are two incidents related to wildfire where a serious injury or fatality to a member of the public occurred that are shown as "unknown" due to ongoing investigation and/or litigation. In addition, an incident that occurred on December 12, 2024, and was received by the Claims Department on July 29, 2025, remains pending while the investigation is ongoing. Historical data will continue to inform PG&E's plans and actions to achieve its goal of zero public safety incidents.
- Benchmarking: Not available. As indicated in the SOMs third-party audit final report, the definition of this metric is uniquely specific to the Metric 1.3 reporting requirement, and there are no directly comparable benchmarks at this time.
- Regulatory Requirements: CPUC, FERC, and Department of Transportation (DOT), public safety reporting requirements
- Attainable Within Known Resources/Work Plan: Yes. PG&E's work and resource plan prioritizes public safety risk reduction. This includes minimizing the risk of catastrophic wildfires in alignment with the continued execution of the Wildfire Mitigation Plan (WMP) and the maturation of key wildfire mitigation strategies. It also includes mitigation of other public safety risks related to the elimination of serious injuries and fatalities (zero Public SIF Actual incidents).
- Appropriate/Sustainable Indicators for Enhanced Oversight Enforcement: A 1-year goal of zero Public SIF Actuals was established in 2022 and has not changed for 2025 through 2029 (5-year). The goal reflects PG&E's intent to immediately and continuously operate without creating risk to the public; and
- Other Qualitative Considerations: PG&E's approach is aligned to and anchored on PG&E's goal and commitment to "always" safe operations.

3. 2025 Target

As discussed above, PG&E's 1-year target for the Public SIF Actual Metric is to demonstrate progress toward eliminating serious injuries and fatalities (zero Public SIF Actual incidents) resulting directly from the incorrect operation of PG&E equipment, the failure, or malfunction of PG&E-owned equipment, or PG&E's failure to comply with any Commission rule or standard.

4. 2029 Target

PG&E's 5-year target for the Public SIF Actual metric is to demonstrate progress toward eliminating serious injuries and fatalities (zero Public SIF Actual incidents) resulting directly from the incorrect operation of PG&E equipment, the failure, or malfunction of PG&E-owned equipment, or PG&E's failure to comply with any Commission rule or standard.

D. (1.3) Performance Against Target

1. Progress Towards the 1-Year Directional Target

There have been no confirmed Public SIF incidents through Q2 2025.

2. Progress Towards the 5-Year Directional Target

As discussed in Section E below, PG&E continues to deploy several programs to maintain or improve the long-term performance of this metric and to meet the Company's 5-year performance target.

E. (1.3) Current and Planned Work Activities

Many of the current and planned activities to eliminate public safety incidents are addressed by meeting key operational risk mitigations, which are discussed in other SOMs Chapters.

The current and planned work activities for reducing the risk of gas transmission and distribution system equipment failure or malfunction are discussed in Chapters 4.1 through 4.7 of this report. The list below touches upon some of these:

- <u>Gas System Damage Prevention team (Chapter 4.1)</u>: PG&E's Damage Prevention team is responsible for the overall management of PG&E's Damage Prevention Program, by managing the risks associated with excavations around PG&E's facilities and conducting investigations. As an additional control to manage the Damage Prevention Program, the Dig-in

Reduction team (DiRT) works closely with various local PG&E operations personnel and respond to referrals from those employees when they observe excavations potentially not in compliance with regulatory requirements. DiRT personnel also assist the Ground Patrol team when they respond to immediate threats identified in the air by the Aerial Patrol team and other PG&E groups, in order to intervene in unsafe digging activities by third parties and follow up to educate excavators as necessary;

- Gas Public Awareness and Damage Prevention Programs (Chapter 4.1): PG&E's Damage Prevention activities include educational outreach activities for professional excavators, local public officials, emergency responders, and the public who lives and works within PG&E's service territory. The program communicates safe excavation practices, required actions prior to excavating near underground pipelines, availability of pipeline location information, and other gas safety information through a variety of methods throughout the year. These efforts are aimed at increasing public awareness about the importance of utilizing the 811 Program before an excavation project is started, understanding the markings that have been placed, and following safe excavation practices after subsurface installations have been marked;
- Gas Field Service and Gas Dispatch (Chapter 4.3): PG&E's Field Service and Gas Dispatch partner together to respond to customer Gas Emergency (odor calls). There is a shared responsibility in the overall performance of this work. Gas Service Representatives (GSR) are deployed systemwide, 24 hours a day—utilizing an on-call as needed;
- Gas Monitoring Controls (Chapter 4.3): Activities which help us to maintain our Gas Emergency Response include continued focus and visibility in our Daily Operating Reviews, Weekly Operating Reviews, and Cross Functional Reviews. These help to illustrate several key drivers, including Dispatch Handle Time, Drive Time, and Wrap Time; and
- Gas Audits (Chapter 4.3): PG&E performs audits on Emergency calls to identify opportunities.
- Gas Data Analysis (4.3): Staffing and historical Gas Emergency Response volume are reviewed to help drive decisions. We utilize Best Practice of

Dispatching to the closest resource. In addition, Dispatcher Ride Alongs with GSRs have been implemented to drive cross-functional understanding.

- Gas Leak Management (Chapter 4.6): The Leak Management Program addresses the risk of Loss of Containment by finding and fixing leaks. PG&E performs leak survey of the gas transmission and storage system twice per year, by either ground or aerial methods in accordance with General Order 112-F. Leak surveys of pipeline and equipment are commonly accomplished on foot or vehicle, by operator-qualified personnel, using a portable methane gas leak detector. Aerial leak surveys, in remote locations and areas difficult to access on the ground, are performed by helicopter using Light Detection and Ranging Infrared technology. Additional activities that complement the Leak Management Program include risk-based leak surveys, mobile leak quantification, and replacing/removing high bleed pneumatic devices at its compressor stations and storage facilities.
- Gas Transmission Integrity Management (Chapter 4.6): The Integrity Management Program provides the tools and processes for risk ranking and prioritization of remediation efforts. This program enables PG&E to focus on identifying and remediating threats to its system. The Transmission Integrity Management Program (TIMP) assesses the threats on every segment of transmission pipe, evaluates the associated risks, and acts to prevent or mitigate these threats. The TIMP approach for assessing risk is based on methodologies consistent with American Society of Mechanical Engineers B31.8S and is in compliance with 49 Code of Federal Regulations Part 192 Subpart O. Many of PG&E's programs that mitigate, and control transmission pipe asset risks are developed and managed within the TIMP program. Examples of assessments or mitigative work that contribute to reducing or preventing significant incidents include strength testing, inline inspection, direct assessment, direct examination, and pipe replacement.

The current and planned work activities for reducing the risk of ET and distribution system equipment failure or malfunction are discussed in Chapters 2.1 through 2.4, and Chapters 3.1 through 3.16 of this report. The list below touches upon some of these:

- Vegetation Management (Chapter 2.1): PG&E's Vegetation Management (VM) team works with our customers and communities to manage trees and other vegetation located near powerlines that could cause a wildfire or power outage. Each year, we inspect approximately 100,000 miles of powerlines, trim or remove more than 1 million trees, and address dead and dying trees. Please see Section 8.2, p. 602, "Vegetation Management, and Inspections" in the 2023-2025 WMP R6 for additional detail.[3]
- Downed Conductor Detection (DCD) (Chapter 2.1): Please see Section 8.1.2.10.1, p. 461, "Downed Conductor Detection Devices" in PG&E's 2023 2025 WMP R6.[4]
- Overhead (OH) Patrols and Inspections (Chapter 3.1): PG&E will continue to execute many ongoing activities to reduce wires down, including the following programs described in PG&E's 2023-2025 WMP R6.[5]
- Asset Replacement (Overhead, Underground): Please see Section 8.1.3.2.5, p. 493, "Overhead Equipment Inspections" in PG&E's 2023 2025 WMP R6.
- Grid Design and System Hardening: Please see Section 8.1.2, p. 398, "Grid Design and System Hardening" in PG&E's 2023 2025 WMP R6.
- Overhead/Underground Critical Operating Equipment (COE) Replacement Work: Please see Section 8.1.4, p. 502, "Equipment Maintenance and Repair" in PG&E's 2023 2025 WMP R6.
- Vegetation Management: Please see Section 8.2, p. 602, "Vegetation Management, and Inspections" in PG&E's 2023 2025 WMP R6.
- Asset Inspection (Chapter 3.3): Detailed inspections of overhead transmission assets seek to proactively identify potential failure modes of asset components which could create future wire down, outage, and/or

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3 2023-2025 Wildfire Mitigation Plan R6.

4 2023-2025 Wildfire Mitigation Plan R6.

5 2023-2025 Wildfire Mitigation Plan R6.

safety events if left unresolved or allowed to “run to failure.” Detailed inspections for transmission assets involve at least two detailed inspection methods per structure (ground and aerial), though not necessarily in the same calendar year which allows for staggered inspection methods across multiple years. Aerial inspections may be completed either by drone, helicopter, or aerial lift.

In addition to the ground and aerial inspections, climbing inspections are also required for 500 kilovolt structures or as triggered. All these inspection methods involve detailed, visual examinations of the assets with use of inspection checklists that are in accordance with the ET Preventive Maintenance standards, as well as the Failure Modes and Effects Analysis.

- Public Safety Power Shut Off (PSPS) (Chapter 3.13): PSPS is a wildfire mitigation strategy, first implemented in 2019, to reduce powerline ignitions during severe weather by proactively de-energizing powerlines (remove the risk of those powerlines causing an ignition) prior to forecasted wind events when humidity levels and fuel conditions are conducive to wildfires. PG&E’s focus with the PSPS Program is to mitigate the risks associated with a catastrophic wildfire and to prioritize customer safety. In 2021, PG&E continued to make progress to its PSPS Program to mitigate wildfire risk, including updating meteorology models and scoping processes. In 2023, PG&E continued a multi-rear effort to install additional distribution sectionalizing devices, Fixed Power Solutions, and other mitigations targeted at reducing the risk of wildfire. In 2024, we updated our thresholds utilizing new and improved risk models.
- Public Awareness Programs: Electric public awareness programs educate non-PG&E contractors and the public about power line safety and the hazards associated with wire down events and are intended to reduce the number of third-party electrical contacts. Outreach efforts include social media campaigns focused on increasing customer awareness of overhead lines, representation at local fire safe councils and community events and the automated customer notification system. Security improvements can include proactive equipment replacement, security measures and intrusion detection devices.

In addition, PG&E's 2023-2025 WMP[6] also includes information regarding grid system hardening and enhancements to reduce the risk of wildfire.

The current and planned work activities for reducing the risk of the power generation hydroelectric system equipment failure or malfunction are below:

- Power Generations Hydroelectric Programs: Hydroelectric programs include procedures for planning for unusual water releases, along with their associated safety warnings;
- Power Generation Compliance Programs: Public Safety Plans are published and routinely updated as required by PG&E hydroelectric facility FERC licenses. FERC and the California Governor's Office of Emergency Services require an Emergency Action Plan (EAP) for all dams classified as significant, high, or extremely high hazard. The Plans are tested annually through drill, seminar, tabletop exercise, and/or functional exercise;
- Hydro Facility Unusual Water Releases and Water Safety Warning Standard and Accompanying Procedure: Hydroelectric facility Unusual Water Releases and Water Safety Warning documentation establishes Hydro facility requirements for planning and making unusual water releases or high flow events and their associated safety warnings.

  In addition, public safety has distributed hydroelectric safety brochures that included dam safety, water safety, and recreational safety information. The brochures notify the recipient that they live near a hydroelectric facility in order to minimize potential reaction time and encourage them to be aware of dangerous spring flows. PG&E mailed brochures to 7,000 recipients for annual FERC compliance;
- PG&E Dam Safety Surveillance and Monitoring Program: This program establishes and defines PG&E's Dam Safety Surveillance and Monitoring Program for the continued long-term safe and reliable operation of PG&E's dams. Dam surveillance involves the collection of data by various means, including inspections and instrumentation, whereas monitoring involves the review of the collected data as obtained and over time for any adverse trends; and

[6] 2023-2025 Wildfire Mitigation Plan R6.

- Canals and Waterways Safety: In 2022, PG&E Power Generation and external public safety representatives successfully tested a new rope system designed to enable members of the public who might accidentally fall into a hydro canal to pull themselves out of danger. Since 2019, an additional 8.3 miles of barrier fencing has been installed along with 139 newly-designed escape ladders. In addition, 327 warning signs have been posted, identifying the canal and specific GPS location.

  Power Generation has also distributed safety information to property owners with canals that bisect their property. A canal entry emergency response plan has been published to guide efficient and timely communications between PG&E personnel and local first responders when responding to emergencies resulting from public entry into PG&E-owned water conveyance systems. PG&E mailed brochures to 1,000 recipients in late Spring of 2024. Brochures included information to help people understand the dangers around canals and to help people prepare and plan for what to do in case of a safety emergency.
- Recreation Safety Posters are posted for recreation sites identified below time sensitive EAP dams. These recreation areas include campgrounds, river access, trails, and boat ramps. Recreation safety posters illustrate what to do in the event of a high flow event or dam safety emergency. Posters provide the public with information on inundation areas, warning signs of a dam safety emergency, safety precautions, and local agency emergency contacts in order to prevent, moderate, or alleviate the effects of an incident. Annually, public safety works with land agents to check all locations and replace signage where needed.
- Drowning Hazard Safety Signs: In response to public safety concerns associated with specific locations, public safety personnel prepared unique drowning hazard safety signs that informed the public of potentially dangerous river currents and changing water levels. PG&E produced multiple signs that were posted at sites for public information. These signs included potential hazards and safety precautions.

The current and planned work activities for reducing the risk enterprise-wide include:

- K through 8th grade safety awareness education. We are continued our long-standing utility public safety awareness education initiative that offers various interactive and educational materials and programs for K-8 educators, their students, and students' families. These resources help educators increase student awareness of utility safety issues, including safety around hydroelectric facilities and waterways. The content of the materials provided to teachers are aligned with STEM (Science, Technology, Engineering, and Math) standards. These classroom materials are offered to districts and educators in all zip codes within PG&E's service territory. Educators are made aware of these resources using a blend of direct mailing, and one-on-one conversations between company representatives and stakeholders. PG&E representatives make direct telephone calls to local school officials and educators to alert them to the availability of materials. PG&E has made additional phone calls to K- through 8th grade schools located within zip codes where PG&E hydroelectric facilities are located. Each of these schools is contacted up to six times to confirm that the schools have received PG&E's offer of educational classroom booklets and encourage stakeholders to use online educational resources that PG&E makes available on its dedicated Safe Kids website. In 2023, PG&E reached approximately 67,000 teachers and delivered educational materials for nearly 300,000 K-8 students and their families. This same outreach occurred in 2024.
- Transportation Safety: PG&E Transportation Safety programs protect our employees and the public by establishing requirements and processes to control risks that can lead to motor vehicle accidents, improve safety performance, and increase awareness of all PG&E employees related to the operation of motor vehicles. This comprehensive program was established to reduce the number of motor vehicle incidents that have the potential for serious injury, including fatal injury, to PG&E's employees, staff augmentation employees operating vehicles on Company business, and the public. Driver performance data is used to identify specific risk drivers for targeted intervention, including driver training and implementing vehicle

safety technology including the cellular phone blocking program currently in use with approximately 2,000 active users. The program has effectively suppressed over 885,000 texts, over 2 million app notifications, and over 198,000 calls since the start of the program through June 2025. Other programs include:

- A Safe Driving policy and Driver Scorecard enhancement launched in August of 2023. Since then, 822 Action Plans have been initiated. Of those, 786 Action Plans have been completed through the end of June 2025.
- The initiation of Smith Driving courses for apprentices and new hires including behind-the-wheel and close-quarter maneuvering courses.
- The retrofit of 745 trouble trucks with Brigade Birdseye External 360 Cameras technology. The cameras are designed to eliminate blind spots, where areas around the vehicle that are obscured to the driver by bodywork or machinery, and provide the driver with the ability to see everything in the vehicle's path.
- Improvements to vehicle roll-over performance through targeted campaigns and by enabling "harsh cornering" monitoring using vehicle telematics.

PG&E's Transportation Safety Department also ensures compliance with federal DOT and California state regulations and requirements which emphasize public and employee safety:

- <u>Contractor Safety Programs</u>: Pre-qualification requirements for the PG&E Contractor Safety Program include a review of the 3-year history of Serious Safety Incidents (Life Altering/Life Threatening) affecting the public. This information must be updated annually. Additional information on the Contractor Safety program can be found in Chapter 1.2 of this report.

PG&Es current and planned activities to eliminate public safety incidents are integrated across the SOM chapters in this report. Functional Areas incorporate public safety into programs and initiatives, ensuring PG&E assets, equipment and procedures address hazards that may impact the public. Leaders across departments collaborate to review incidents involving the public, capturing lessons learned and preventing recurrence.

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 2.1
SYSTEM AVERAGE INTERRUPTION DURATION INDEX (SAIDI) (UNPLANNED)

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 2.1
SYSTEM AVERAGE INTERRUPTION
DURATION INDEX (SAIDI)
(UNPLANNED)

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PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 2.1
SYSTEM AVERAGE INTERRUPTION DURATION INDEX (SAIDI) (UNPLANNED)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (2.1) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 2.1 – System Average Interruption Duration Index (SAIDI) (Unplanned) is defined as:

*SAIDI (Unplanned) = average duration of sustained interruptions per metered customer due to all unplanned outages, excluding on Major Event Days (MED), in a calendar year. "Average duration" is defined as: Sum of (duration of interruption * # of customer interruptions)/Total number of customers served. "Duration" is defined as: Customer hours of outages. Includes all transmission and distribution outages.*

2. Introduction of Metric

SAIDI (Unplanned) measures the total number of minutes (or hours) of interruption the average Pacific Gas and Electric Company (PG&E) customer experiences from unplanned outages.

3. Audit Results

In the Audit Report, Metric 2.1 received a Metric Accuracy Finding of "None." There were no Other Findings for this metric.[1]

B. (2.1) Metric Performance

1. Historical Data (2013 – June 2025)

Historical performance for this metric covers periods 2013 through June 2025. (See Figure 2.1-1 below).

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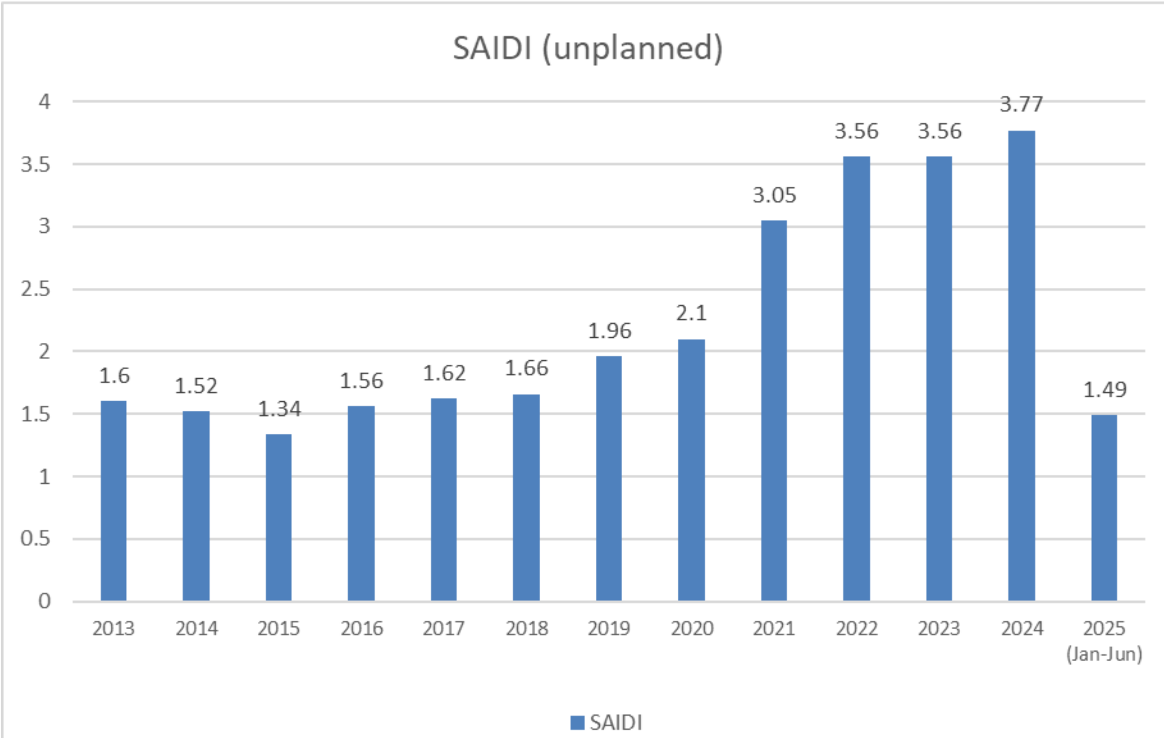
[1] Audit Report, p. 8, Table 1-1.

FIGURE 2.1-1
SAIDI (UNPLANNED)
HISTORICAL PERFORMANCE (2013-JUNE 2025)



Note: The data in this figure is subject to change based on continuing review of prior period information.

2. Data Collection Methodology

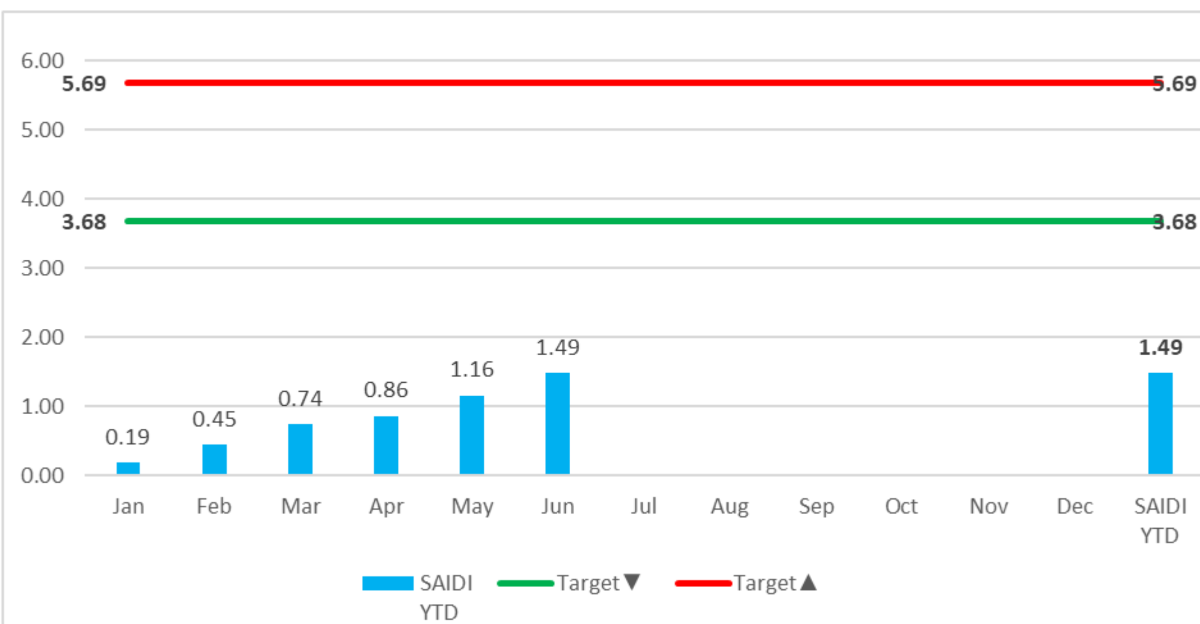
- PG&E implemented its current outage reporting system in 2015 that included the data conversion of its legacy database. This new system consists of two main components that are typically referred to as PG&E's Integrated Logging and Information System (ILIS) and its Operations Database (ODB).
- PG&E maintains account specific information for customers affected by outages that are recorded and stored in ODB. This system tracks outages at various levels (generation, transmission, substation, primary distribution, and individual transformers) and the most current outage data were used to compile the information contained in this metric. Distribution operators log outage information in ILIS to record the outage start, switching operations, and outage end times..

- Qualification of Customer Count Calculations: PG&E is executing a multi-year plan to align its reliability reporting practices with the IEEE 1366-2022 standard. As part of this plan, SOMs reliability metric data from January through June 2025 is based on customer counts that reflect metered customers with active service agreements. Due to limitations in available data and ongoing efforts to improve methodologies for determining accurate customer count estimates, PG&E has retained an independent third party to refine how PG&E calculates the customer minutes. The customer count from this analysis is the basis for the SOMs metric calculations in this report and is subject to change as methodologies are refined.

3. Metric Performance for the Reporting Period

SAIDI (Unplanned) performance during the first six months of 2025 recorded an average of 1.49 hours of sustained interruptions. Equipment failure, third party outages, EPSS posturing beginning in May, and weather continue to drive metric performance.

FIGURE 2.1-2
SAIDI (UNPLANNED)
PERFORMANCE JAN-JUN 2025



C. (2.1) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

No updates were made to the one and five year targets since last report.

2. Target Methodology

For target baseline, 3-year average of past performance for SAIDI (Unplanned) is utilized to reflect consistent application across the PG&E system. The target band is set with a 50 percent increase from the baseline to form the upper target band, and a 3 percent decrease from the baseline to form the lower target band. This is consistent to the approach utilized for 2024 target setting. It is important to note that for the 1-year and 5-year goal setting, the underlying customer count data is different as described in the first section of the document.

Upper Band: 5.69 $\underline{5.69 = 3.79 \times 1.5}$

Lower Band: 3.68 $\underline{3.68 = 3.79 \times .97}$

- Historical Data and Trends: Considers past performance data, and trends;
- Benchmarking: PG&E is currently in the fourth quartile;
- Regulatory Requirements: CPUC Decision (D.20-05-053);
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The target range for this metric is suitable for Enhanced Oversight and Enforcement as it accounts for our current work plan and the unknowns of EPSS;
- Attainable with Known Resources/Work Plan: Yes; and
- Other Considerations: None.

3. 2025 Target

The 2025 target range is 3.68 to 5.69 hours. PG&E continues to monitor historical and current performance, year-to-year weather shifts, and outages related to EPSS and DCD, which are key wildfire safety measures. Future targets may account for variability in weather conditions and current uncertainties on future EPSS/DCD impacts.

4. 2029 Target

The 2029 target is the same as the 2025 target range. PG&E continues to monitor historical and current performance, year-over-year weather variables and EPSS- and DCD-related outages. As a result, targets have the potential to be adjusted in each subsequent reporting period.

D. (2.1) Performance Against Target

1. Progress Towards 1-Year Target

Metric performance during the first six months of 2025 recorded 1.49 hours of sustained interruptions per metered customer due to unplanned outages durations, and is performing below projected targets year-to-date. (See Figure 2.1-2 above). Weather and EPSS/DCD settings may impact 2025 performance.

2. Progress Towards 5-Year Target

PG&E considers current and historical performance, current and future planned work activities, and focus on continuous improvement, and expects metric performance to perform under the 5-year target.

E. (2.1) Current and Planned Work Activities

PG&E has existing programs that support SAIDI performance and historical trend data for SAIDI, including but not limited to:

- Vegetation Management: Please see Section 8.2, p. 602, "Vegetation Management, and Inspections" in PG&E's 2023-2025 Wildfire Mitigation Plan R6.[2]
- Asset Replacement (Overhead, Underground): Please see Section 8.1.3.2.5, p. 493, "Overhead Equipment Inspections" in PG&E's 2023-2025 Wildfire Mitigation Plan R6.[2]
- Grid Design and System Hardening: Please see Section 8.1.2, p. 398, "Grid Design and System Hardening" in PG&E's 2023-2025 Wildfire Mitigation Plan R6.[2]
- Downed Conductor Detection: Please see Section 8.1.2.10.1, p. 461, "Downed Conductor Detection Devices" in PG&E's 2023-2025 Wildfire Mitigation Plan R6.[2]

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2 2023-2025 Wildfire Mitigation Plan R6.

- Animal Abatement: Please see Section 8.1.2.12.2, p. 471, “Other Technologies and Systems” in PG&E’s 2023-2025 Wildfire Mitigation Plan R6.[2]
- Overhead/Underground Critical Operating Equipment Replacement Work: Please see Section 8.1.4, p. 502, “Equipment Maintenance and Repair” in PG&E’s 2023-2025 Wildfire Mitigation Plan R6.[2]
- Overhead Fuse Installation: Please see Section 4.13.2.1., “Overhead Fuse (Capital MAT 49C)” in General Rate Case (GRC) 2023-2026.[3]
- Fault Location, Isolation, and Service Restoration: Please see Section 4.13.2., “Distribution Circuit Zone Reliability (Capital MWC 49)” in GRC 2023-2026.[3]

[3] 2023 GRC (A.21-06-021)

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 2.2

SYSTEM AVERAGE INTERRUPTION FREQUENCY (SAIFI)

(UNPLANNED)

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
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SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 2.2
SYSTEM AVERAGE INTERRUPTION FREQUENCY (SAIFI) (UNPLANNED)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (2.2) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 2.2 – System Average Interruption Frequency (SAIFI)(Unplanned) is defined as:

SAIFI (Unplanned) = average frequency of sustained interruptions due to all unplanned outages per metered customer, except on Major Event Days (MED), in a calendar year. "Average frequency" is defined as: Total # of customer interruptions/Total # of customers served. Includes all transmission and distribution outages.

2. Introduction of Metric

SAIFI (Unplanned) is a measure of the total number of unplanned sustained service interruptions that the average Pacific Gas and Electric Company (PG&E) customer experiences in year. A sustained interruption is defined as an interruption lasting more than 5 minutes.

3. Audit Results

In the Audit Report, Metric 2.2 received a Metric Accuracy Finding of "None." There were no other findings for this metric.[1]

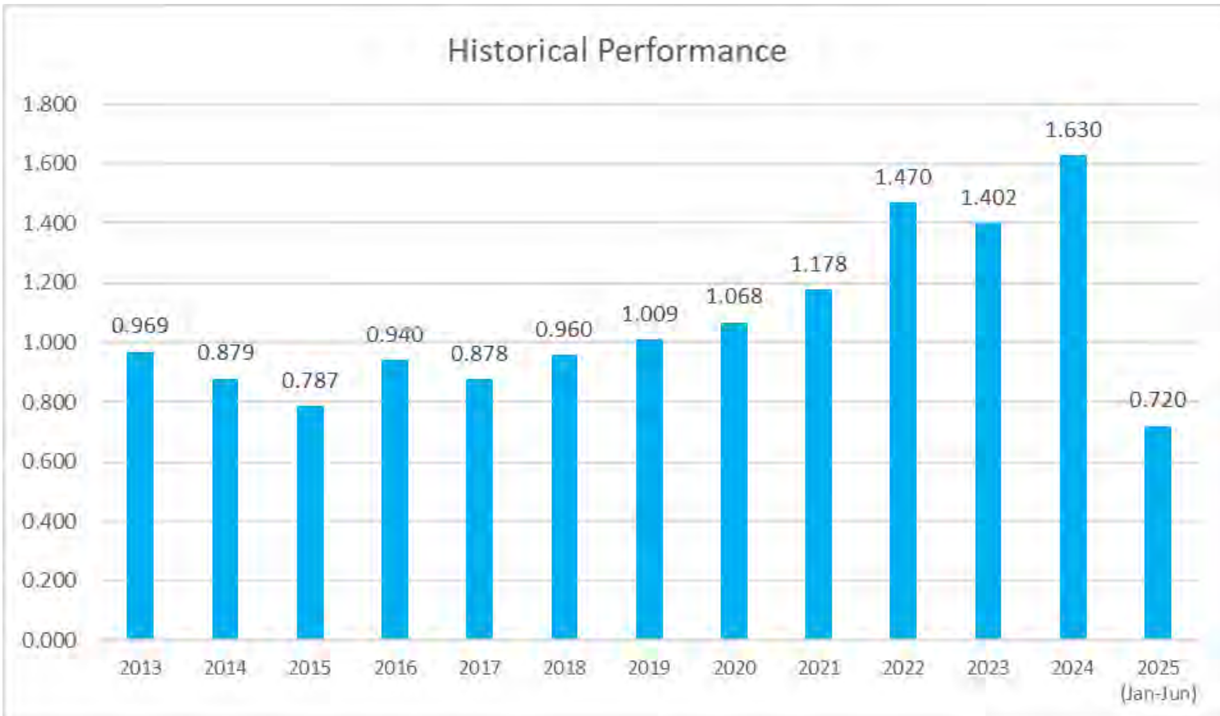
B. (2.2) Metric Performance

1. Historical Data (2013 – June 2025)

Historical performance for SAIFI cover periods 2013 through June 2025. Refer to Figure 2.2-1 for SAIFI (Unplanned) historical performance.

[1] Audit Report, p. 8, Table 1-1.

FIGURE 2.2-1
SAIFI (UNPLANNED)
HISTORICAL PERFORMANCE
2013-JUNE 2025



Note: The data in this figure is subject to change based on continuing review of prior period information.

2. Data Collection Methodology

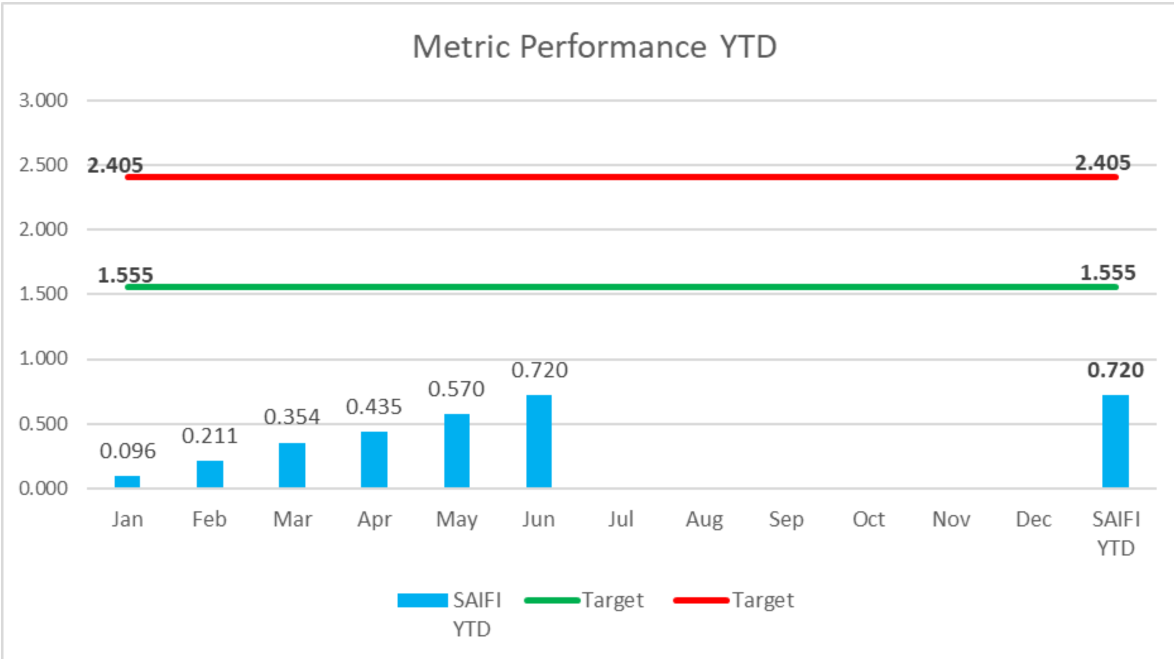
- PG&E implemented its current outage reporting system in 2015 that included the data conversion of its legacy database. This new system consists of two main components that are typically referred to as PG&E's Integrated Logging and Information System (ILIS) and its Operations Database (ODB).
- PG&E maintains account specific information for customers affected by outages that are recorded and stored in ODB. This system tracks outages at various levels (generation, transmission, substation, primary distribution, and individual transformers) and the most current outage data were used to compile the information contained in this metric.
- Distribution operators log outage information in ILIS to record the outage start, switching operations, and outage end times.

- Qualification of Customer Count Calculations: PG&E is executing a multi-year plan to align its reliability reporting practices with the IEEE 1366-2022 standard. As part of this plan, SOMs reliability metric data from January through June 2025 is based on customer counts that reflect metered customers with active service agreements. Due to limitations in available data and ongoing efforts to improve methodologies for determining accurate customer count estimates, PG&E has retained an independent third party to refine how PG&E calculates the customer minutes. The customer count from this analysis is the basis for the SOMs metric calculations in this report and is subject to change as methodologies are refined.

3. Metric Performance for the Reporting Period

Performance for the first six months of 2025 recorded an average of 0.720 sustained interruptions due to unplanned outages per metered customer. Equipment failure, third-party outages, Enhanced Powerline Safety Settings (EPSS) posturing beginning in May, and weather continue to drive metric performance.

FIGURE 2.2-2
SAIFI (UNPLANNED)
METRIC PERFORMANCE
JAN-JUN 2025



C. (2.2) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

No updates were made to the 1- and 5-year targets since last report.

2. Target Methodology

For target baseline, the three-year average of past performance for SAIFI is utilized to reflect consistent EPSS application across the PG&E system. The target band is set with a 50 percent increase to form the upper target band and a 3 percent decrease to form the lower target band. This is consistent with the approach utilized for 2024 target setting. It is important to note that for the 1-year and 5-year goal setting, the underlying data is different as described in Section 2.2.A.2.

Upper Band: 2.405	2.405 = 1.603 x 1.5
Lower Band: 1.555	1.555 = 1.603 x .97

- Historical Data and Trends: Considers past performance data and trends;

- Benchmarking: PG&E is currently in the fourth quartile;
- Regulatory Requirements: California Public Utilities Commission Decision (D.) (D.20-05-053);
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The target range for this metric is suitable for Enhanced Oversight and Enforcement as it accounts for our current work plan and the unknowns of EPSS;
- Attainable with Known Resources/Work Plan: Yes; and
- Other Considerations: None.

3. 2025 Target

The 2025 target range is 1.555 – 2.405 average sustained interruptions per metered customer. PG&E continues to monitor historical and current performance, year-to-year weather shifts, and EPSS and Downed Conductor Detection (DCD)-related outages. Future targets may adjust to account for changes due to variability in weather conditions and current uncertainties on future EPSS and DCD impacts.

4. 2029 Target

The 2029 target range is the same as the 2025 target. PG&E continues to monitor historical and current performance, and year-over-year weather variables shift, and EPSS and DCD-related outages. As a result, targets have the potential to be adjusted in each subsequent reporting period.

D. (2.2) Performance Against Target

1. Progress Towards 1-Year Target

Performance for the first six months of 2025 recorded an average of 0.720 sustained interruptions due to unplanned outages per metered customer, and is performing below 2025 targets. (See Figure 2.2-2 above). Weather and EPSS/DCD settings may impact 2025 performance.

2. Progress Towards 5-Year Target

PG&E considers current and historical performance, current and future planned work activities, and focus on continuous improvement, and expects metric performance to perform under the 5-year target.

E. (2.2) Current and Planned Work Activities

Existing Programs that SAIFI performance include, but are not limited to, the following:

- Vegetation Management: Please see Section 8.2, p. 602, "Vegetation Management, and Inspections" in PG&E's 2023-2025 Wildfire Mitigation Plan R6;[2]
- Asset Replacement (Overhead, Underground): Please see Section 8.1.3.2.5, p. 493, "Overhead Equipment Inspections" in PG&E's 2023-2025 Wildfire Mitigation Plan R6;[2]
- Grid Design and System Hardening: Please see Section 8.1.2, p. 398, "Grid Design and System Hardening" in PG&E's 2023-2025 Wildfire Mitigation Plan R6;[2]
- Downed Conductor Detection: Please see Section 8.1.2.10.1, p. 461, "Downed Conductor Detection Devices" in PG&E's 2023-2025 Wildfire Mitigation Plan R6;[2]
- Animal Abatement: Please see Section 8.1.2.12.2, p. 471, "Other Technologies and Systems" in PG&E's 2023-2025 Wildfire Mitigation Plan R6;[2] and
- Overhead/Underground Critical Operating Equipment Replacement Work: Please see Section 8.1.4, p. 502, "Equipment Maintenance and Repair" in PG&E's 2023-2025 Wildfire Mitigation Plan R6.[2]
- Overhead Fuse Installation: Please see Section 4.13.2.1., "Overhead Fuse (Capital MAT 49C)" in General Rate Case (GRC) 2023-2026.[3]
- Fault Location, Isolation, and Service Restoration: Please see Section 4.13.2., "Distribution Circuit Zone Reliability (Capital MWC 49)" in GRC 2023-2026.[3]

2 2023-2025 Wildfire Mitigation Plan R6.

3 2023 GRC (A.21-06-021)

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 2.3

SYSTEM AVERAGE OUTAGES DUE TO VEGETATION AND EQUIPMENT DAMAGE IN HFTD AREAS

(MAJOR EVENT DAYS)

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 2.3
SYSTEM AVERAGE OUTAGES DUE TO VEGETATION AND
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SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 2.3
SYSTEM AVERAGE OUTAGES DUE TO VEGETATION AND EQUIPMENT DAMAGE IN HFTD AREAS (MAJOR EVENT DAYS)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (2.3) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 2.3 – System Average Outages Due to Vegetation and Equipment Damage in High Fire Threat District (HFTD) Areas (Major Event Days (MED)) is defined as:

Average number of sustained outages on MED per 100 circuit miles in HFTD per metered customer, in a calendar year, where each sustained outage is defined as: total number of customers interrupted / total number of customers served.

2. Introduction of Metric

Based on Pacific Gas and Electric Company's (PG&E) understanding, this metric is specific to Customers Experiencing Sustained Outages (CESO) per 100 circuit miles in Tier 2 and Tier 3 HFTD areas, where the basic cause is vegetation or equipment failure during MEDs.

3. Audit Results

In the Audit Report, Metric 2.3 received a Metric Accuracy Finding of "Significant." The Other Findings for this metric were "Discrepancy between CESO data pulled monthly and annually."[1] The finding has not been resolved.

The corrections implemented include enhancements to existing processes whereby outage data, specifically Global Positioning System Open Point latitude and longitude coordinates provided in Integrated

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[1] Audit Report, p. 8, Table 1-1.

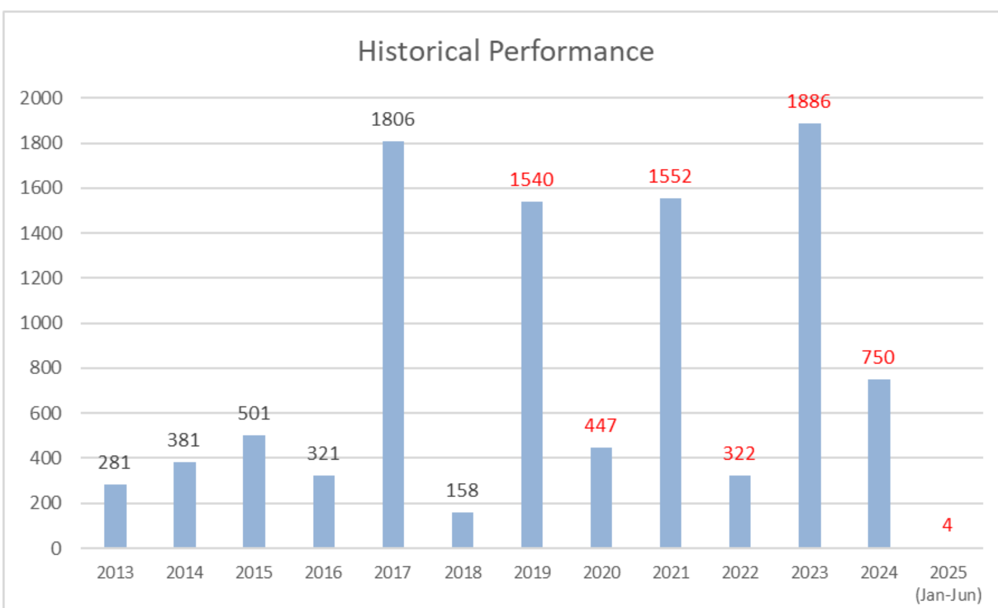
Logging and Information System (ILIS), are combined with the HFTD definition in our Electric Distribution Geographic Information System to identify outages in the HFTD. This reanalysis enables improved spatial alignment of outages and wires down events with HFTD designations. For this reporting period, corrected HFTD designations have been applied to both historical and current outage data from 2019 through June 2025. The findings are expected to be resolved with an automated data set by Q4 2025. This is part of a multi-year PG&E plan to align its reliability reporting practices with the IEEE 1366-2022 standard.

B. (2.3) Metric Performance

1. Historical Data (2013 – June 2025)

Historical performance from 2019 through June 2025 has been revised to reflect corrected HFTD designations. As a result of this update, the historical number of customers experiencing sustained outages per 100 miles in HFTD areas has increased.

FIGURE 2.3-1
CESO PER 100 CIRCUIT MILES (HFTD) (MED)
VEG & EQUIP FAILURE
2013-JUNE 2025



Note: The data in this figure is subject to change based on continuing review of prior period information.

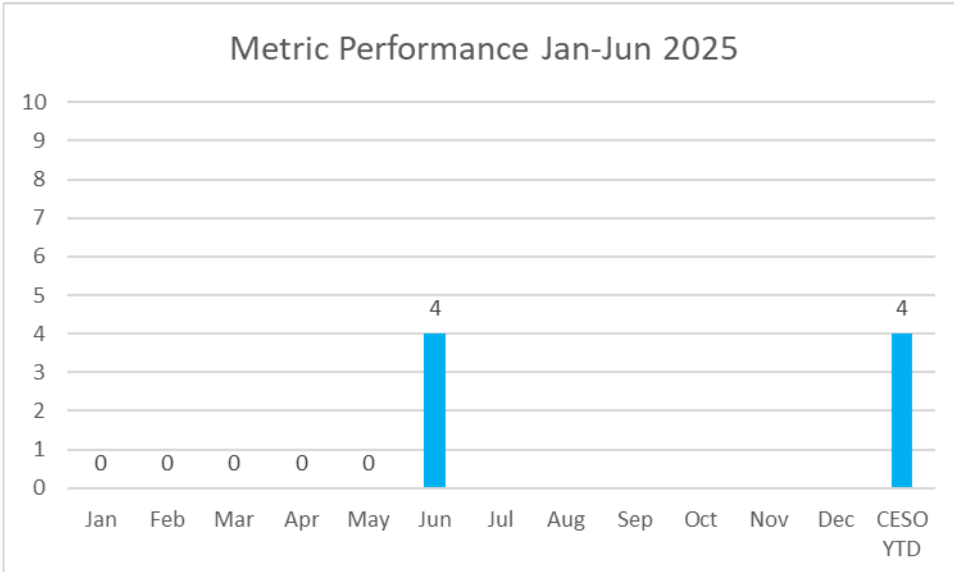
2. Data Collection Methodology

- PG&E implemented its current outage reporting system in 2015 that included the data conversion of its legacy database. This new system consists of two main components that are typically referred to as PG&E's ILIS and its Operations Database (ODB).
- PG&E maintains account specific information for customers affected by outages that are recorded and stored in ODB. This system tracks outages at various levels (generation, transmission, substation, primary distribution, and individual transformers) and the most current outage data were used to compile the information contained in this metric.
- Distribution operators log outage information in ILIS to record the outage start, switching operations, and outage end times.
- PG&E uses the Lat/Long of the operating device as a proxy for determining the distribution outage events that occurred in the Tier 2/3 HFTD areas.
- Qualification of Customer Count Calculations: PG&E is executing a multi-year plan to align its reliability reporting practices with the IEEE 1366-2022 standard. As part of this plan, SOMs reliability metric data from January through June 2025 is based on customer counts that reflect metered customers with active service agreements. Due to limitations in available data and ongoing efforts to improve methodologies for determining accurate customer count estimates, PG&E has retained an independent third party to refine how PG&E calculates the customer minutes. The customer count from this analysis is the basis for the SOMs metric calculations in this report and is subject to change as methodologies are refined.

3. Metric Performance for the Reporting Period

From January through June 2025, metric performance recorded 4 CESOs per 100 circuit miles in HFTD areas, during MEDs, when vegetation and equipment failure was the basic cause (See Figure 2.3-2 below). PG&E's service territory experienced one MED during this period, occurring on June 19.

FIGURE 2.3-2
CESO PER 100 CIRCUIT MILES (HFTD) (MED)
VEG & EQUIP FAILURE
JAN-JUN 2025



C. (2.3) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

There have been no changes to the directional 1- and 5-year targets since last report.

2. Target Methodology

- Directional Only: Maintain (stay within historical range and assumes the response stays the same in events);
- Historical Data and Trends: Considers past performance data and trends;
- Benchmarking: PG&E is currently in the fourth quartile;
- Regulatory Requirements: California Public Utilities Commission Decision (D.) (D.20-05-053);
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The directional target for this metric is suitable for Enhanced Oversight and Enforcement as it states we are to remain within historical performance range while accounting for the randomness of weather patterns and impacts of climate change;
- Attainable with Known Resources/Work Plan: Yes; and

- Other Considerations: None.

D. (2.3) Performance Against Target Progress

1. Progress Towards the 1-Year Target

This is directional-only metric without a specific performance target. Based on current performance through June 2025, PG&E is well within historical performance; however, it is worth noting we have had one MED year-to-date. Performance could be significantly different by the end of the year depending on the number of MEDs that may occur. See Figure 2.3-1 above.

2. Progress Towards the 5-Year Target

This is directional-only metric without a specific performance target.

E. (2.3) Current and Planned Work Activities

Existing Programs that support Reliability Metric Performance, include but are not limited to:

- Vegetation Management: Please see Section 8.2, p. 602, "Vegetation Management, and Inspections" in PG&E's 2023-2025 Wildfire Mitigation Plan R6.[2]
- Asset Replacement (Overhead, Underground): Please see Section 8.1.3.2.5, pg. 493, "Overhead Equipment Inspections" in PG&E's 2023-2025 Wildfire Mitigation Plan R6.[2]
- Grid Design and System Hardening: Please see Section 8.1.2, p. 398, "Grid Design and System Hardening" in PG&E's 2023-2025 Wildfire Mitigation Plan R6.[2]
- Downed Conductor Detection: Please see Section 8.1.2.10.1, p. 461, "Downed Conductor Detection Devices" in PG&E's 2023-2025 Wildfire Mitigation Plan R6.[2]
- Animal Abatement: Please see Section 8.1.2.12.2, p. 471, "Other Technologies and Systems" in PG&E's 2023-2025 Wildfire Mitigation Plan R6.[2]

2 PG&E's 2023-2025 Wildfire Mitigation Plan R6.

- Overhead/Underground Critical Operating Equipment Replacement Work: Please see Section 8.1.4, p. 502, “Equipment Maintenance and Repair” in PG&E’s 2023-2025 Wildfire Mitigation Plan R6.[2]
- Overhead Fuse Installation: Please see Section 4.13.2.1., “Overhead Fuse” (Capital MAT 49C)” in General Rate Case (GRC) 2023-2026.[3]
- Fault Location, Isolation, and Service Restoration: Please see Section 4.13.2., “Distribution Circuit Zone Reliability (Capital MWC 49)” in GRC 2023-2026.[3]

[3] 2023 GRC (A.21-06-021).

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SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 2.4
SYSTEM AVERAGE OUTAGES DUE TO VEGETATION AND EQUIPMENT DAMAGE IN HFTD AREAS
(NON-MAJOR EVENT DAYS)

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The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (2.4) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 2.4 – System Average Outages due to Vegetation and Equipment Damage in High Fire Threat District (HFTD) Areas (Non-Major Event Days) is defined as:

Average number of sustained outages on Non-Major Event Days (MED) per 100 circuit miles in High Fire Threat District (HFTD) per metered customer, in a calendar year, where each sustained outage is defined as: total number of customers interrupted/total number of customers served.

2. Introduction of Metric

Based on Pacific Gas and Electric Company's (PG&E) understanding, this metric is specific to Customers Experiencing Sustained Outages (CESO) per 100 circuit miles in Tier 2/3 HFTD areas, where the basic cause is vegetation or equipment failure during non-MEDs.

3. Audit Results

In the Audit Report, Metric 2.4 received a Metric Accuracy Finding of "Significant." The Other Findings for this metric were "Discrepancy between CESO data pulled monthly and annually."[1] These findings have not been resolved.

The corrections implemented include enhancements to existing processes whereby outage data, specifically Global Positioning System Open Point latitude and longitude coordinates provided in Integrated

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[1] Audit Report, p. 8, Table 1-1.

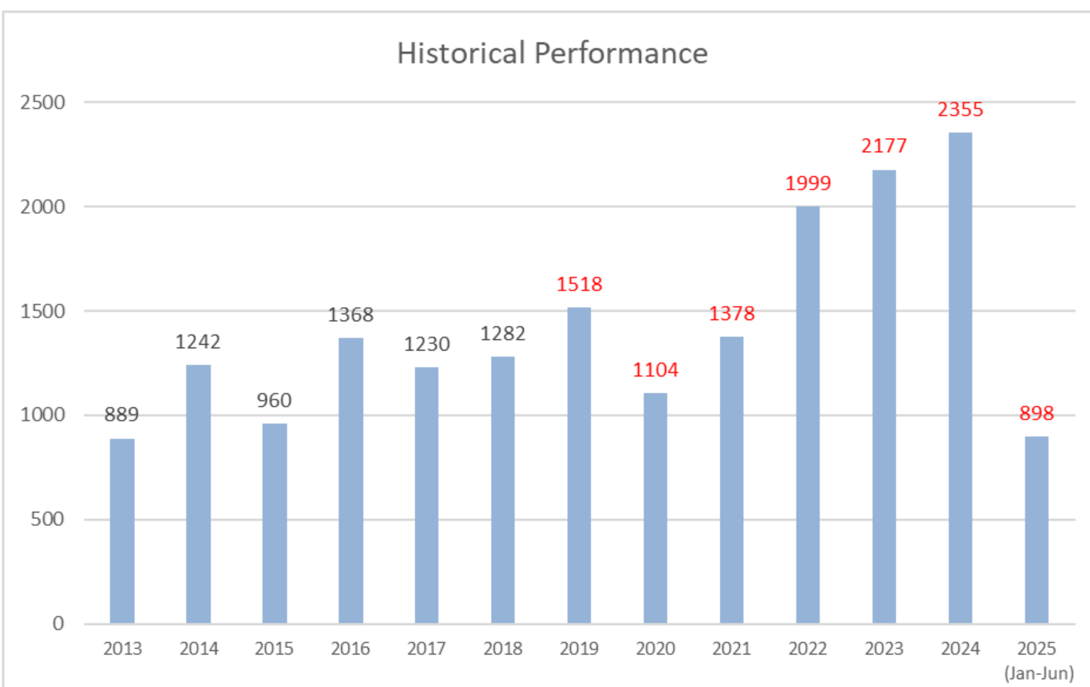
Logging and Information System (ILIS), are combined with the HFTD definition in our Electric Distribution Geographic Information System to identify outages in the HFTD. This reanalysis enables improved spatial alignment of outages and wires down events with HFTD designations. For this reporting period, corrected HFTD designations have been applied to both historical and current outage data from 2019 through June 2025. The findings are expected to be resolved with an automated data set by Q4 2025. This is part of a multi-year PG&E plan to align its reliability reporting practices with the IEEE 1366-2022 standard.

B. (2.4) Metric Performance

1. Historical Data (2013 – June 2025)

Historical performance from 2019 through June 2025 has been revised to reflect corrected HFTD designations. As a result of this update, the historical number of customers experiencing sustained outages per 100 miles in HFTD areas has increased.

FIGURE 2.4-1
CESO PER 100 CIRCUIT MILES (HFTD) (NON-MED)
VEG & EQUIP FAILURE
2013-JUNE 2025



Note: The data in this figure is subject to change based on continuing review of prior period information. Corrected HFTD classifications have been applied to the years 2020-2025.

2. Data Collection Methodology

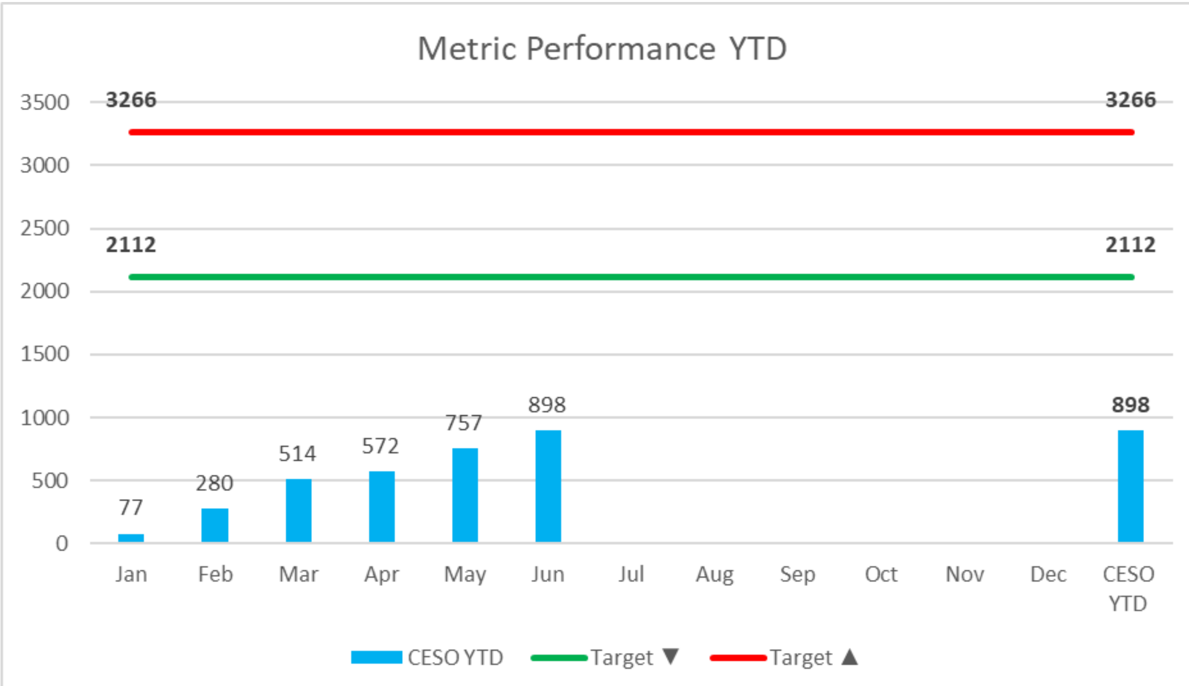
Data Sources:

- PG&E implemented its current outage reporting system in 2015 that included the data conversion of its legacy database. This new system consists of two main components that are typically referred to as PG&E's ILIS and its Operations Database (ODB).
- PG&E maintains account specific information for customers affected by outages that are recorded and stored in ODB. This system tracks outages at various levels (generation, transmission, substation, primary distribution, and individual transformers) and the most current outage data were used to compile the information contained in this metric.
- Distribution operators log outage information in ILIS to record the outage start, switching operations, and outage end times.
- PG&E uses the Lat/Long of the operating device as a proxy for determining the distribution outage events that occurred in the Tier 2/3 HFTD areas.
- Qualification of Customer Count Calculations: PG&E is executing a multi-year plan to align its reliability reporting practices with the IEEE 1366-2022 standard. As part of this plan, SOMs reliability metric data from January through June 2025 is based on customer counts that reflect metered customers with active service agreements. Due to limitations in available data and ongoing efforts to improve methodologies for determining accurate customer count estimates, PG&E has retained an independent third party to refine how PG&E calculates the customer minutes. The customer count from this analysis is the basis for the SOMs metric calculations in this report and is subject to change as methodologies are refined.

3. Metric Performance for the Reporting Period

Metric performance for this reporting period reflects revised HFTD designations. During the first six months of 2025, a total of 302,078 customers experienced sustained outages occurring in HFTD areas, excluding MEDs, when vegetation and/or equipment failure was the basic cause of outage, equating to 898 CESO per 100 circuit miles (See Figure 2.4-2 below).

FIGURE 2.4-2
CESO PER 100 CIRCUIT MILES (HFTD) (NON-MED)
VEG & EQUIP FAILURE
JAN-JUN 2025



C. (2.4) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

The 1- and 5-year targets have been revised from 1,523–1,980 to 2,112–3,266 since last reporting period. Updated HFTD designations were retroactively applied to the previous reporting periods, resulting in higher historical performance metrics. This adjustment influenced the 3-year performance average, which serves as the basis for target setting.

2. Target Methodology

Target Setting Methodology: For target baseline, 3-year average of past performance is utilized to reflect consistent Enhance Powerline Safety Settings (EPSS) application across the PG&E. The target methodology has also been updated to align with the methodology for Metrics 2.1 and 2.2 as outlined below.

3-year performance average (2022-2024): 2177
-3% Lower Range: 2177 x .97 = 2112
+50% Upper Range: 2177 x 1.5 = 3266

- Historical Data and Trends: Considers past performance data and trends;
- Benchmarking: PG&E is currently in the fourth quartile;
- Regulatory Requirements: California Public Utilities Commission Decision (D.) (D.20-05-053);
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The target for this metric is suitable for Enhanced Oversight and Enforcement as it aligns with unplanned SAIFI target range and accounts for our current work plan and the unknowns of EPSS;
- Attainable with Known Resources/Work Plan: Yes; and
- Other Considerations: None.

3. 2025 Target

The updated 2025 target is 2,112–3,266, reflecting higher historical performance values due to revised HFTD designations, which impacted the 3-year average used for target setting. PG&E continues to monitor historical and current performance trends, year-to-year weather shifts, and EPSS- and Downed Conductor Detection (DCD)-related outages. As such, targets have the potential to be adjusted in each subsequent reporting period.

4. 2029 Target

The updated 2029 target is the same as 2025 target. PG&E continues to monitor historical performance, evolving weather patterns, and outages related to EPSS and DCD. As these variables shift year-over-year, targets may be adjusted in future reporting periods.

D. (2.4) Progress Towards 1- and 5-Year Target

1. Performance Against the 1-Year Target

Metric performance against the 1-year target recorded 898 CESO per 100 circuit miles in HFTD areas, excluding MED, and is performing below projected 2025 targets (See Figure 2.4-2 above). Metric performance reflects updated HFTD designations.

2. Performance Against the 5-Year Target

PG&E considers current and historical performance, current and future planned work activities, and focus on continuous improvement, and expects metric performance to remain within the 5-year target.

E. (2.4) Current and Planned Work Activities

Existing Programs that support Reliability Metric Performance, include, but are not limited to:

- Vegetation Management: Please see Section 8.2, p. 602, “Vegetation Management, and Inspections” in PG&E’s 2023-2025 Wildfire Mitigation Plan R6.[2]
- Asset Replacement (Overhead, Underground): Please see Section 8.1.3.2.5, p. 493, “Overhead Equipment Inspections” in PG&E’s 2023-2025 Wildfire Mitigation Plan R6.[2]
- Grid Design and System Hardening: Please see Section 8.1.2, p. 398, “Grid Design and System Hardening” in PG&E’s 2023-2025 Wildfire Mitigation Plan R6.[2]
- Downed Conductor Detection: Please see Section 8.1.2.10.1, p. 461, “Downed Conductor Detection Devices” in PG&E’s 2023-2025 Wildfire Mitigation Plan R6.[2]
- Animal Abatement: Please see Section 8.1.2.12.2, p. 471, “Other Technologies and Systems” in PG&E’s 2023-2025 Wildfire Mitigation Plan R6.[2]
- Overhead/Underground Critical Operating Equipment Replacement Work: Please see Section 8.1.4, p. 502, “Equipment Maintenance and Repair” in PG&E’s 2023-2025 Wildfire Mitigation Plan R6.[2]
- Overhead Fuse Installation: Please see Section 4.13.2.1., “Overhead Fuse (Capital MAT 49C)” in General Rate Case (GRC) 2023-2026.[3]

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2 PG&E’s 2023-2025 Wildfire Mitigation Plan R6.

3 2023 GRC (A.21-06-021).

- Fault Location, Isolation, and Service Restoration: Please see Section 4.13.2., “Distribution Circuit Zone Reliability (Capital MWC 49)” in GRC 2023-2026.[3]

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.1
WIRES DOWN MAJOR EVENT DAYS IN HFTD AREAS (DISTRIBUTION)

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WIRES DOWN MAJOR EVENT DAYS IN HFTD AREAS
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PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.1
WIRES DOWN MAJOR EVENT DAYS IN HFTD AREAS (DISTRIBUTION)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.1) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 3.1 – Wires Down Major Event Days (MED) in High Fire Threat District (HFTD) Areas (Distribution) is defined as:

Number of Wires Down events on MED involving overhead (OH) primary or secondary distribution circuits divided by total circuit miles of OH primary distribution lines x 1,000, in HFTD Areas in a calendar year.

2. Introduction of Metric

In 2012, Pacific Gas and Electric Company (PG&E or the Company) initiated the Electric Wires Down Program, including introduction of the electric wires down metric, to advance the Company's focus on public safety by reducing the number of electric wire conductors that fail and result in contact with the ground, a vehicle, or other object.

This metric is associated with our Failure of Electric Distribution OH Asset Risk and Wildfire Risk, which are part of our 2024 Risk Assessment and Mitigation Phase Report filing.

3. Audit Results

In the Audit Report, Metric 3.1 received a Metric Accuracy Finding of "Significant." The Other Findings for this metric were "ILIS as the database of record impacts event counts."[1] These findings have not been resolved and are in-progress.

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[1] Audit Report, p. 8, Table 1-1.

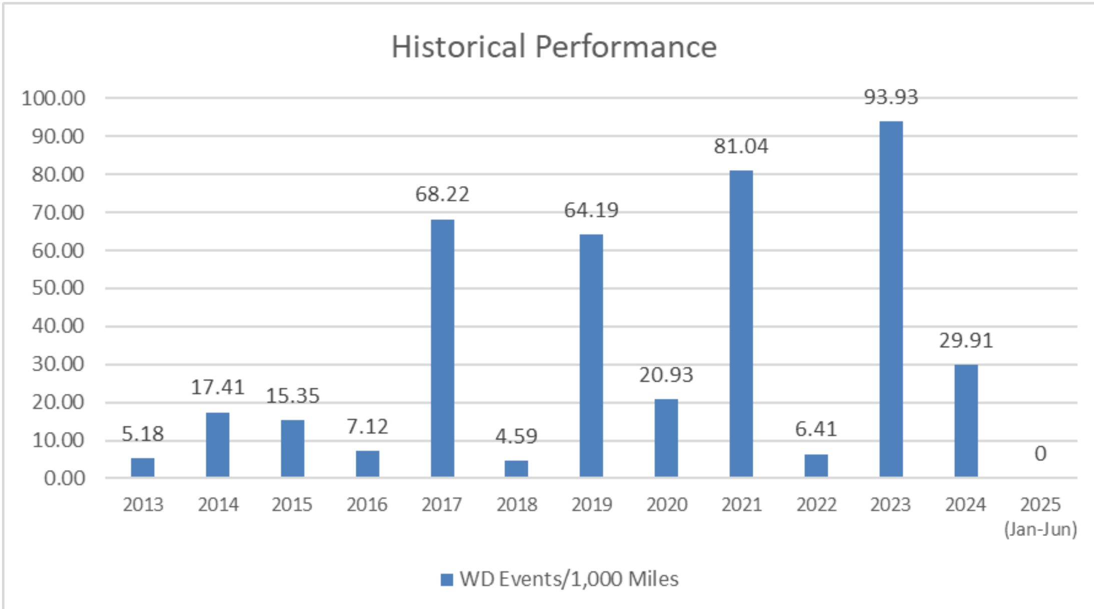
The corrections implemented include enhancements to existing processes whereby outage data, specifically Global Positioning System Open Point latitude and longitude coordinates provided in Integrated Logging Information System (ILIS), are combined with the HFTD definition in our Electric Distribution Geographic Information System to identify outages in the HFTD. This reanalysis enables improved spatial alignment of outages and wires down events with HFTD designations. For this reporting period, corrected HFTD designations have been applied to both historical and current outages and wires down event data from 2013 through June 2025. The findings are expected to be resolved with an automated data set by Q4 2025. This is part of a multi-year PG&E plan to align its reliability reporting practices with the IEEE 1366-2022 standard.

B. (3.1) Metric Performance

1. Historical Data (2013– June 2025)

Historical performance for wire down events occurring on MEDs within HFTDs covers periods 2013 through June 2025. Metric performance for these years has been updated to reflect wire down events within HFTD areas, using corrected HFTD designations (see Figure 3.1-1 below). Historical metric performance has consistently remained below target thresholds. Additionally, PG&E has tracked and recorded meds during the same period (see Table 3.1-2 below). Due to the unpredictability of weather and the inability to forecast the volume of meds each year, year-to-year fluctuations in performance make it difficult to discern performance trends.

FIGURE 3.1-1
HISTORICAL PERFORMANCE
WIRES DOWN HFTD (MED)
(2013-JUNE 2025)



Note: The data in this figure is subject to change based on continuing review of prior period outages.

TABLE 3.1-1
MAJOR EVENT DAYS TABLE

2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025 (Jan-Jun)
4	5	10	3	30	7	31	14	25	5	20	5	1

Note: The data in this table is subject to change based on continuing review of prior period outages.

TABLE 3.1-2
DISTRIBUTION HFTD CIRCUIT MILEAGE TABLE

Distribution HFTD Circuit Mileage	
2013-2022 HFTD Circuit Miles (D)[(a)]	25,271
2023 HFTD Circuit Miles (D)	25,060
2024 HFTD Circuit Miles (D)	24,878
2025 HFTD Circuit Miles (D)	24,673

(a) Performance from 2013- 2022 uses 2021 HFTD circuit

2. Data Collection Methodology

PG&E uses the ILIS – Operations Database, to track and count the number of wire down incidents, as well as our Electric Distribution Geographical Information System (EDGIS) to determine if the wire down incident was in an HFTD locations. Although our outage database does not specifically identify precise location of the downed wire, we use the Latitude and Longitude (e.g., Lat/Long) of the device used to isolate the involved electric power line section as a proxy. We also use our EDGIS application to determine if that device (via: Lat/Long information) is in the HFTD (e.g., Tier 2 or Tier 3 location). We have improved our existing processes and transmitted the Lat/Long to our Data & Analytics team to spatially align the wire down events against EDGIS to report accurate HFTD designations. Outage information is entered into ILIS by our electric distribution operators based on information from field personnel and devices such as Supervisory Control and Data Acquisition alarms and SmartMeter™[2] devices. We last upgraded our outage reporting tools in 2015 and integrated SmartMeter information to identify potential outage reporting errors and to initiate a subsequent review and correction.

PG&E defines the number of wire down events as the number of outages caused by one or more wire down faults. For example, if a single wire down fault causes two protective devices to operate, such as a Line Recloser momentary trip and a downstream fuse burning open, this will be recorded as two separate outages and two wire down events. Alternatively, one protective device operating for a fault caused by multiple spans or phases of wire coming down, will be recorded as one wire down event. This is due to limitations of what can be recorded in the outage logging system. While we are not making any immediate changes to our reporting process, we are evaluating our procedure to determine if our calculation of this metric can be adjusted to address these limitations.

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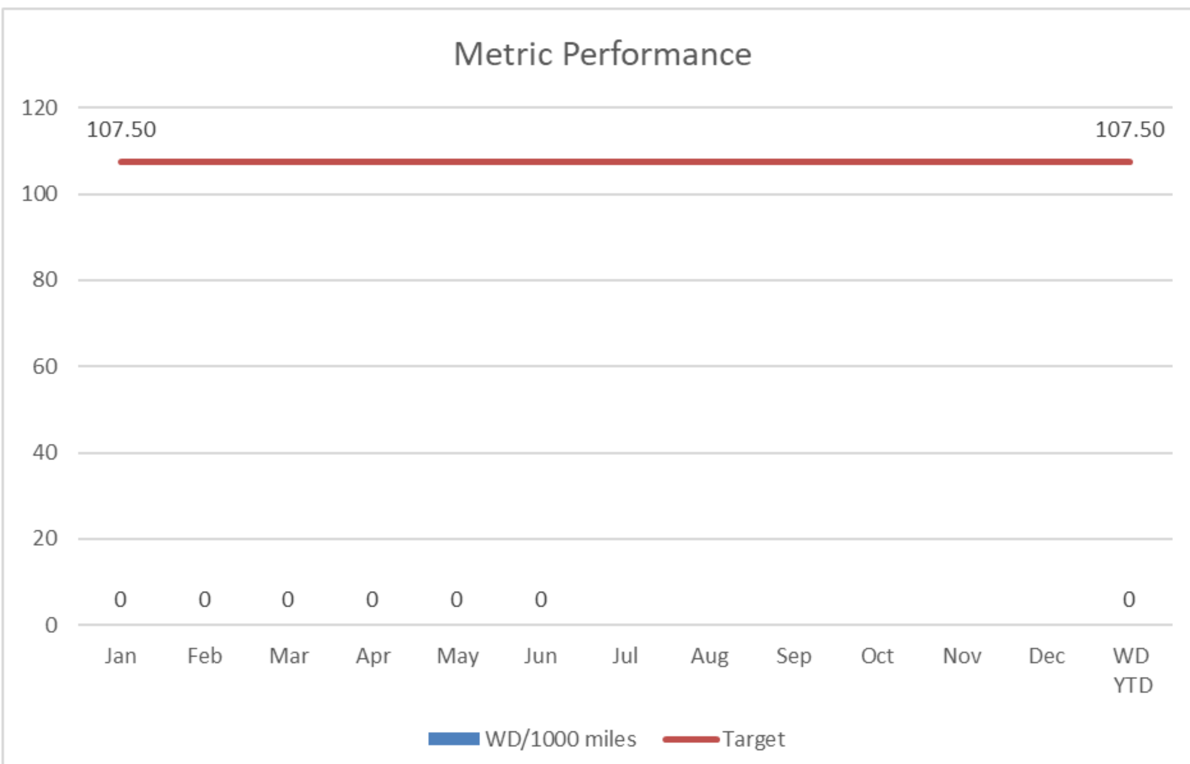
2 SmartMeter is a PG&E registered trademark. All further references to SmartMeters in PG&E's testimony in this proceeding should be assumed to refer to the trademarked name, without continually using the ™ symbol, consistent with legally-acceptable practice.

3. Metric Performance for the Reporting Period

Metric performance for this reporting period recorded zero wire down events per 1,000 distribution circuit miles located within HFTD areas, including MEDs (see Figure 3.1-4 below). PG&E's service territory experienced one MED during this period, occurring on June 19 (see Table 3.1-2 above). The number of MEDs experienced during this reporting period highlights the significant year-to-year variability driven by weather conditions and the severity of each event, which impacts the frequency of wire down events.

FIGURE 3.1-2
METRIC PERFORMANCE
WIRES DOWN EVENTS/1000 MILES HFTD (MED)
JAN-JUN 2025



C. (3.1) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

Directional 1- and 5-year targets have been updated to 107.50 to account for an increase in wire down events resulting from corrected HFTD designations. Target methodology remains unchanged since the last report.

2. Target Methodology

- Directional Only: Maintain (stay within historical range, and assumes response stays the same in events).

  Based on the historical performance of this metric, PG&E interprets "Maintain" as staying within 2 standard deviations from the 10-year average. This equates to an upper limit of 107.50 (as shown in Figure 3.1-4);
- Historical Data and Trends: This metric is expected to remain within the historical performance levels, but will vary based on the number of MEDs and severity of weather experienced in a year;
- Benchmarking: Not available to the best of our knowledge;
- Regulatory Requirements: None;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The directional target for this metric is suitable for Enhanced Oversight and Enforcement as it states performance will remain within the historical range which accounts for unknown factors which may vary, such as the frequency and severity of weather;
- Attainable Within Known Resources/Work Plan: Yes, targets are attainable within known resources, however, this metric is impacted by the variability in conditions outside of PG&E's control, such as the volume and severity of weather on MED; and
- Other Considerations: None.

3. 2025 Target

The updated 2025 target is 107.50, which accounts for an increase in wire down events resulting from corrected HFTD designations. This target is 2-standard deviations above the 10-year average.

4. 2029 Target

The updated 2029 target is the same as the 1-year target and is expected to maintain within historical performance levels.

D. (3.1) Performance Against Target

1. Progress Towards the 1-Year Target

Metric performance towards the 1-year target recorded zero wire down events per 1,000 distribution circuit miles within HFTD areas, including

MEDs (see Figure 3.1-4 above). PG&E's service territory experienced one MED during this period, occurring on June 19 (see Table 3.1-2 above). If favorable weather persists, metric performance is expected to remain below the 2025 target threshold.

2. Progress Towards the 5-Year Target

PG&E's commitment to public safety and service reliability drives the initiatives, programs, and work efforts mentioned in Section E below.

E. (3.1) Current and Planned Work Activities

PG&E will continue to execute many ongoing activities to reduce wires down, including the following programs:

- Asset Replacement (Overhead, Underground): Please see Section 8.1.3.2.5, p. 493, "Overhead Equipment Inspections" in PG&E's 2023-2025 Wildfire Mitigation Plan (WMP) R6.[3]
- Grid Design and System Hardening: Please see Section 8.1.2, p. 398, "Grid Design and System Hardening" in PG&E's 2023-2025 WMP R6.[3]
- Downed Conductor Detection: Please see Section 8.1.2.10.1, p. 461, "Downed Conductor Detection Devices" in PG&E's 2023-2025 WMP R6.[3]
- Overhead/Underground Critical Operating Equipment Replacement Work: Please see Section 8.1.4, p. 502, "Equipment Maintenance and Repair" in PG&E's 2023-2025 WMP R6.[3]
- Vegetation Management: Please see Section 8.2, p. 602, "Vegetation Management, and Inspections" in PG&E's 2023-2025 WMP R6.[3]

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[3] PG&E's 2023-2025 Wildfire Mitigation Plan R6.

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.2
WIRES DOWN NON-MAJOR EVENT DAYS IN HFTD AREAS
(DISTRIBUTION)

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CHAPTER 3.2
WIRES DOWN NON-MAJOR EVENT DAYS IN HFTD AREAS (DISTRIBUTION)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.2) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 3.2 – Wires Down Non-Major Event Days (Non-MED) in High Fire Threat District (HFTD) Areas (Distribution) is defined as:

Number of Wires Down events on Non-MED involving overhead (OH) primary distribution circuits divided by the total circuit miles of OH primary distribution lines x 1,000, in HFTD areas, in a calendar year.

2. Introduction to the Metric

In 2012, Pacific Gas and Electric Company (PG&E or the Company) initiated the Electric Wires Down Program, including introduction of the electric wires down metric, to advance the Company's focus on public safety by reducing the number of electric wire conductors that fail and result in contact with the ground, a vehicle, or other object.

This metric is associated with our Failure of Electric Distribution OH Asset Risk and Wildfire Risk, which are part of our 2024 Risk Assessment and Mitigation Phase Report (RAMP) filing.

3. Audit Results

In the Audit Report, Metric 3.2 received a Metric Accuracy Finding of "Significant." The Other Findings for this metric were "ILIS as the database of record impacts event counts."[1] These findings have not been resolved and are in-progress.

[1] Audit Report, p. 8, Table 1-1.

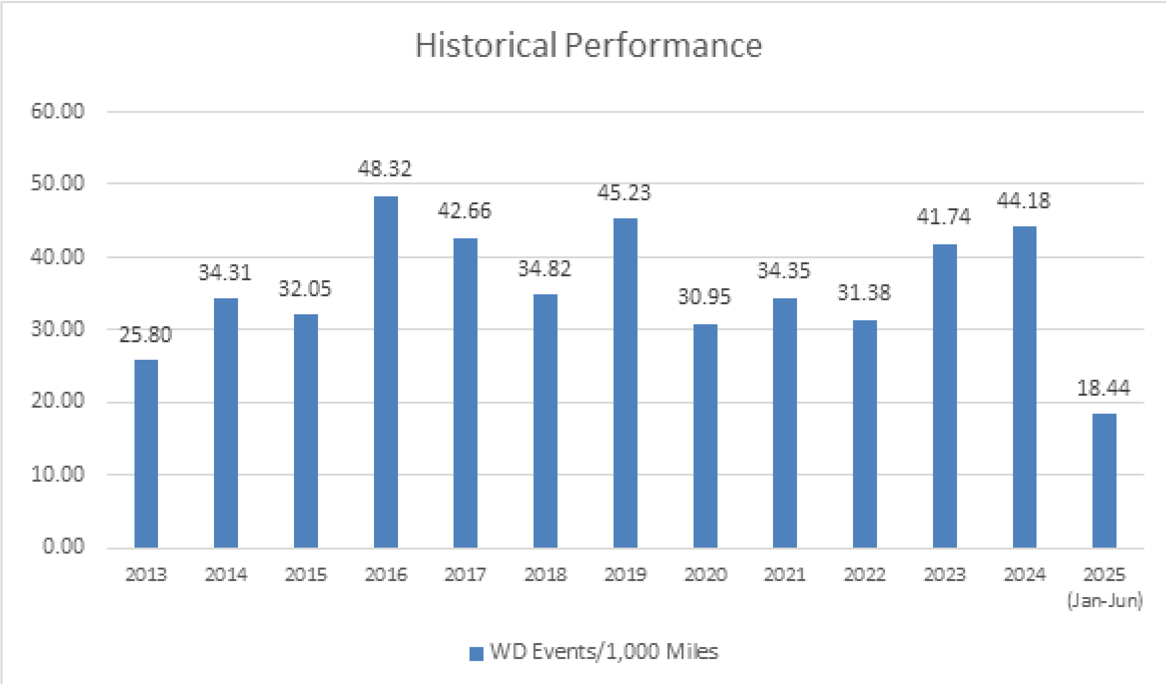
The corrections implemented include enhancements to existing processes whereby outage data, specifically Global Positioning System Open Point latitude and longitude coordinates provided in Integrated Logging Information System (ILIS), are combined with the High Fire Threat District (HFTD) definition in our Electric Distribution Geographic Information System to identify outages in the HFTD. This reanalysis enables improved spatial alignment of outages and wires down events with HFTD designations. For this reporting period, corrected HFTD designations have been applied to both historical and current outages and wires down event data from 2013 through June 2025. The findings are expected to be resolved with an automated data set by Q4 2025. This is part of a multi-year PG&E plan to align its reliability reporting practices with the IEEE 1366-2022 standard.

B. (3.2) Metric Performance

1. Historical Data (2013-June 2025)

Historical performance for wire down events occurring on non-MEDs within HFTDs covers periods 2013 through June 2025. Metric performance for these years has been updated to reflect wire down events within HFTD areas, using corrected HFTD designations (see Figure 3.2-1 below). Historical metric performance has consistently remained below target thresholds.

FIGURE 3.2-1
HISTORICAL PERFORMANCE
WIRES DOWN HFTD (NON-MED)
(2013 JUNE 2025)



Note: The data in this figure is subject to change based on continuing review of prior period outages.

TABLE 3.2-1
DISTRIBUTION HFTD CIRCUIT MILEAGE TABLE

Distribution HFTD Circuit Mileage	
*2013-2022 HFTD Circuit Miles (D)	25,271
2023 HFTD Circuit Miles (D)	25,060
2024 HFTD Circuit Miles (D)	24,878
2025 HFTD Circuit Miles (D)	24,673

Note: Performance from 2013- 2022 uses 2021 HFTD circuit mileage

2. Data Collection Methodology

PG&E uses its ILIS-Operations Database to track and count the number of wire down incidents, as well as its electric distribution geographical information systems (EDGIS) to determine if the wire down incident was in an HFTD locations. Although the outage database does not specifically identify precise location of the downed wire, the Latitude and Longitude (e.g., Lat/Long) of the device is used to isolate the involved electric power line section as a proxy. We also use our EDGIS application to determine if that device (via: Lat/Long information) is in the HFTD (e.g., Tier 2 or Tier 3 location). We have improved our existing processes and transmitted the Lat/Long to our Data & Analytics team to spatially align the wire down events against EDGIS to report accurate HFTD designations. Outage information is entered into ILIS by our electric distribution operators based on information from field personnel and devices such as Supervisory Control and Data Acquisition alarms and SmartMeter™[2] devices. We last upgraded our outage reporting tools in 2015 and integrated SmartMeter information to identify potential outage reporting errors and to initiate a subsequent review and correction.

PG&E defines the number of wire down events as the number of outages caused by one or more wire down faults. For example, if a single wire down fault causes two protective devices to operate, such as a Line Recloser momentary trip and a downstream fuse burning open, this will be recorded as two separate outages and two wire down events. Alternatively, one protective device operating for a fault caused by multiple spans or phases of wire coming down, will be recorded as one wire down event. This is due to limitations of what can be recorded in the outage logging system. While we are not making any immediate changes to our reporting process, we are evaluating our procedure to determine if our calculation of this metric can be adjusted to address these limitations.

3. Metric Performance for the Reporting Period

Metric performance for this reporting period recorded 18.44 wire down events per 1,000 distribution circuit miles within HFTD areas, excluding MEDs (see Figure 3.2-3 below).

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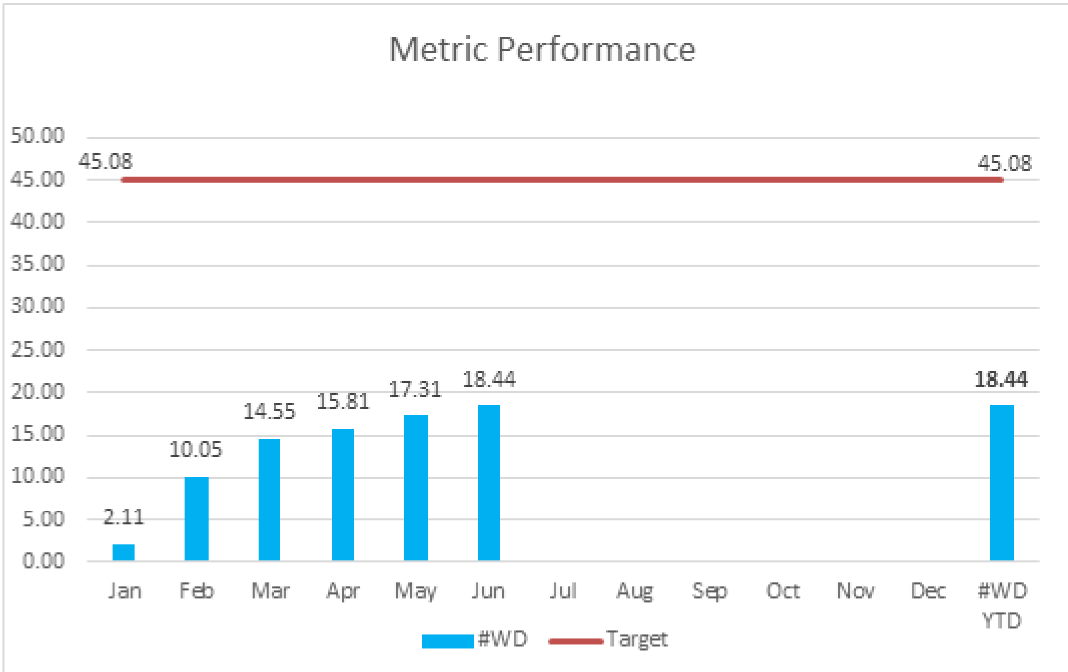
[2] SmartMeter is a PG&E registered trademark. All further references to SmartMeters in PG&E's testimony in this proceeding should be assumed to refer to the trademarked name, without continually using the ™ symbol, consistent with legally-acceptable practice.

FIGURE 3.2-2
METRIC PERFORMANCE
WIRES DOWN EVENTS/1000 MILES HFTD (NON-MED)
JAN-JUN 2025



C. (3.2) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

Directional 1- and 5-year targets have been updated to 45.08 to account for an increase in wire down events resulting from corrected HFTD designations. Target methodology remains unchanged since the last report.

2. Target Methodology

- Directional Only: Maintain (stay within historical range, and assumes response stays the same in events).

  Based on the historical performance of this metric, PG&E interprets "Maintain" as staying within 1 standard deviation from the 10-year average. This equates to an upper limit of 45.08 (as shown in Figure 3.2-3);
- Historical Data and Trends: This metric is expected to remain within the historical performance levels, but will vary based on the number of MEDs and severity of weather experienced in a year;
- Benchmarking: Not available to the best of our knowledge;

- Regulatory Requirements: None;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The directional target for this metric is suitable for Enhanced Oversight and Enforcement as it states performance will remain within the historical range which accounts for unknown factors which may vary, such as the frequency and severity of weather;
- Attainable Within Known Resources/Work Plan: Yes, targets are attainable within known resources, however this metric is impacted by the variability in conditions outside of PG&E's control, such as the weather conditions on non-MEDs; and
- Other Considerations: None.

3. 2025 Target

The updated 2025 target is 45.08, which accounts for an increase in wire down events resulting from corrected HFTD designations. This target is 1-standard deviation above the 10-year average.

4. 2029 Target

The updated 2029 target is the same as the 1-year target and is expected to maintain within historical performance levels.

D. (3.2) Performance Against Target

1. Progress Towards the 1-Year Target

Metric performance towards the 1-year target recorded 18.44 wire down events per 1,000 distribution circuit miles within HFTD areas, excluding MEDs (see Figure 3.2-3 above). If favorable weather persists, metric performance is expected to remain below the 2025 target threshold.

2. Progress Towards the 5-year Target

PG&E's commitment to public safety and service reliability drives the initiatives, programs, and work efforts mentioned in Section E below.

E. (3.2) Current and Planned Work Activities

PG&E will continue to execute many ongoing activities to reduce wires down, including the following programs:

- Asset Replacement (Overhead, Underground): Please see Section 8.1.3.2.5, p. 493, "Overhead Equipment Inspections" in PG&E's 2023-2025 Wildfire Mitigation Plan (WMP) R6;[3]
- Grid Design and System Hardening: Please see Section 8.1.2, p. 398, "Grid Design and System Hardening" in PG&E's 2023-2025 WM Plan R6;[3]
- Downed Conductor Detection: Please see Section 8.1.2.10.1, p. 461, "Downed Conductor Detection Devices" in PG&E's 2023-2025 WMP R6;[3]
- Overhead/Underground Critical Operating Equipment Replacement Work: Please see Section 8.1.4, p. 502, "Equipment Maintenance and Repair" in PG&E's 2023-2025 WMP R6;[3] and
- Vegetation Management: Please see Section 8.2, p. 602, "Vegetation Management, and Inspections" in PG&E's 2023-2025 WMP R6.[3]

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3 PG&E's 2023-2025 Wildfire Mitigation Plan R6.

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SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.3
WIRES DOWN MAJOR EVENT DAYS IN HFTD AREAS
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CHAPTER 3.3
WIRES DOWN MAJOR EVENT DAYS IN HFTD AREAS (TRANSMISSION)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.3) Overview

1. Metric Definition

Safety and Operational Metric 3.3 – Wires Down Major Event Days (MED) in High Fire Threat District (HFTD) Areas (Transmission) is defined as:

Number of Wires Down events on MED involving overhead transmission circuits divided by total circuit miles of overhead transmission lines x 1,000, in HFTD Areas in a calendar year.

2. Introduction of Metric

This metric is a measure of how Pacific Gas and Electric Company (PG&E or the Company) provides safe and reliable electric services to its customers. It is also a measure of how available PG&E's electric transmission (ET) grid is to the market for the buying and selling of electricity as managed by the California Independent System Operator (CAISO).

This metric is associated with PG&E's Failure of ET Overhead Asset Risk and Wildfire Risk, which are part of the Company's 2020 Risk Assessment and Mitigation Phase Report filing.

3. Audit Results

In the Audit Report, Metric 3.3 received a Metric Accuracy Finding of "None." There were no Other Findings for this metric.[1]

1 Audit Report, pg. 8, Table 1-1.

B. (3.3) Metric Performance

1. Historical Data (2013 – June 2025)

Historical performance for this metric cover periods 2013 through June 2025. Although PG&E started measuring wire down incidents in 2012, 2013 was the first full year uniformly measuring the number of transmission wire down events. This metric is normalized by the transmission circuit miles within Tier 2 and Tier 3 HFTDs. The HFTD boundaries are a recent development and were not defined for several years within the historical data timeframe. Hence, for all years prior to and including 2022, PG&E uses 5,525.9 overhead transmission circuit miles in Tier 2/3 HFTD areas and assumes any variances in prior years are negligible. Moving forward, HFTD mileage will be refreshed at the beginning of each year. Table 3.3-1 provides the HFTD miles used for each year.

TABLE 3.3-1
HFTD MILES

Line No.	Year	HFTD Miles
1	Prior to 2023	5525.9
2	2023	5437.7
3	2024	5402.3
4	2025	5377.4

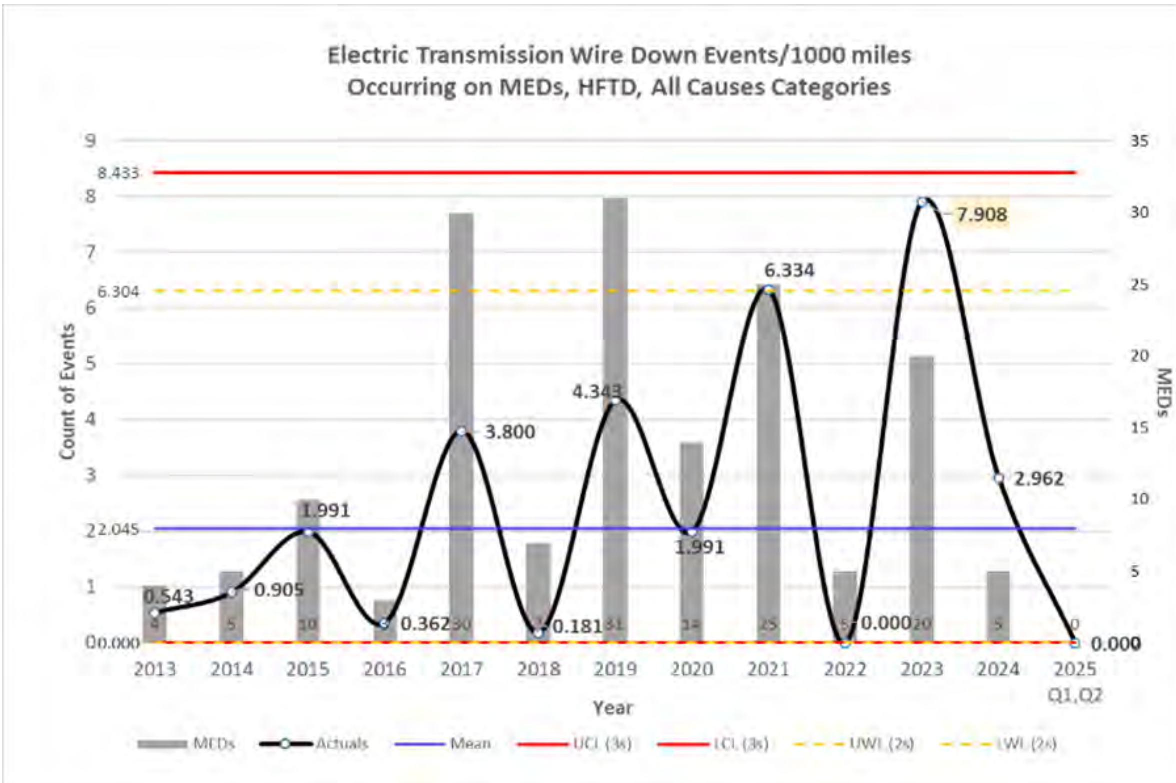
2. Data Collection Methodology

Unplanned ET outages are documented by PG&E's Transmission Operations Department using its Transmission Operations Tracking and Logging (TOTL) application. If distribution-served customers are affected by a particular transmission wire down event, the data captured in TOTL is merged with respective data from PG&E's distribution outage reporting application (Integrated Logging Information System) in a separate dataset known as the Transmission Outage database. PG&E uses the Lat/Long of the device used to operate/isolate the involved line section as a proxy, supplemented with findings from fault patrols, and then uses its Electric Transmission Geographic Information System application to determine if that point is in a Tier 2 or Tier 3 HFTD area.

3. Metric Performance for the Reporting Period

Figure 3.3-1 below is a control chart showing historical annual performances through June 2025. For the reporting period, the metric performance is 0.000.

TABLE 3.3-2
ELECTRIC TRANSMISSION WIRES DOWN EVENTS OCCURRING ON MEDS PER 1,000 CIRCUIT MILES HFTD (2013-JUNE 2025)



Due to a correction to the 2023 data, the annual performance was recalculated to be 7.908 compared to the 8.092 previously reported. There is no change to the 1-Year and 5-Year targets.

C. (3.3) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

There are no updates to the directional 1- and 5-Year Targets since last report, to maintain performance within the historical range, i.e., the target is to stay below the Upper Control Limit (UCL). The UCL for 2025 (1 Year) and 2029 (5 Year) is 8.433.

2. Target Methodology

All systems and processes and their outputs exhibit variability. Control charts help monitor variability and can be used to differentiate common causes of variability from special causes. Common, or chance, causes are numerous small causes of variability that are inherent to a system and operate randomly. Special, or assignable, causes can have relatively large effects on the process and may lead to a state that is out of statistical control.

PG&E's control charts are set up using a static time window of 2013-2022. Using the actual data from those years allows us to calculate the following values that are used in the control charts:

- Mean: Average value of the metric.
- Standard Deviation: Amount of variation of the metric calculated by taking the square root of the variance of the dataset.
- UCL: The maximum value that can be attributed to natural fluctuations calculated by mean plus three standard deviations.
- Lower Control Limit (LCL): The minimum value that can be attributed to natural fluctuations calculated by mean minus three standard deviations.
- Upper Warning Limit: The warning value that should raise a flag to take a proactive response to prevent the metric from approaching the UCL calculated by mean plus two standard deviations.
- Lower Warning Limit: The warning value that should raise a flag to take a proactive response to prevent the metric from approaching the LCL calculated by mean minus two standard deviations.

The probability that a point falls above the UCL, which for most control chart designs, is approximately 0.00135 and an indicator of significant process degradation if only common causes are operating. It is therefore unlikely to have performance fall beyond the control limits when no special cause is operating.

To establish the 1-Year and 5-Year targets, PG&E considered the following:

- Historical Data and Trends: 1-Year and 5-Year Targets are set to maintain performance within a three-standard deviation range using the available historical data. A three-standard deviation remains consistent with other ET external report filings with the CAISO.

- Benchmarking: Not available to best of our knowledge;
- Regulatory Requirements: None;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The directional target for this metric is suitable for Enhanced Oversight and Enforcement as it states metric performance will remain in historical range;
- Attainable Within Known Resources/Work Plan: Yes, this metric is attainable within known resources, however this metric is impacted by the variability in conditions outside of PG&E's control, such as the severity of inclement weather on MED; and
- Other Considerations: None.

3. 2025 Target

Not to exceed 8.433 (UCL), which represents maintaining within a 3-standard deviation historical range.

4. 2029 Target

Not to exceed 8.433 (UCL), which represents maintaining within a three-standard deviation historical range.

D. (3.3) Performance Against Target

1. Progress Towards the 1-Year Target

In the first two quarters of 2025, PG&E experienced zero wire down events per 1,000 circuit miles in HFTDs on MEDs resulting in a performance of 0.000.

2. Progress Towards the 5-Year Target

As discussed in Section E below, PG&E is deploying a number of programs to maintain or improve long-term performance of this metric to meet the Company’s 5-year directional performance target.

E. (3.3) Current and Planned Work Activities

Wire down events can be caused by a variety of factors, including, but not limited to asset failure, third-party contact, or vegetation contact. The following work activities may provide future resiliency for certain wire down event causes, though the effectiveness of the work is dependent upon the circumstances of the wire down event (e.g., new assets may still be prone to a wire down event that occur due to extreme weather events outside of standard design guidance).

- Asset Inspection: Please see Section 8.1.3.1, p. 476, "Asset Inspections – Transmission" in PG&E's 2023-2025 Wildfire Mitigation Plan (WMP) R6.[2]
- Asset Repair and Replacement: Please see Section 8.1.4, p. 502, "Equipment Maintenance and Repair" in PG&E's 2023-2025 WMP R6.[2]
- Vegetation Inspection: Please see Section 8.2.2.1, p. 661 "Vegetation Inspection – Transmission", in PG&E's 2023-2025 WMP R6.[2]
- Integrated Vegetation Management: Please see Section 8.2.2.1.3, p. 668, "Integrated Vegetation Management (IVM)" in PG&E's 2023-2025 WMP R6.[2]
- Routine North American Electric Reliability Corporation (NERC) & Non Routine NERC: Please see Section 8.2.2.1.1, p. 663, "Routine Transmission NERC and Non-NERC" in PG&E's 2023-2025 WMP R6.[2]

2 PG&E's 2023-2025 Wildfire Mitigation Plan R6

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.4

WIRES DOWN NON-MAJOR EVENT DAYS IN HFTD AREAS

(TRANSMISSION)

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CHAPTER 3.4
WIRES DOWN NON-MAJOR EVENT DAYS IN HFTD AREAS (TRANSMISSION)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.4) Introduction

1. Metric Definition

Safety and Operational Metric (SOM) 3.4 – Wires Down Non-Major Even Days in High Fire Threat District (HFTD) Areas (Transmission) is defined as:

Number of Wires Down events on Non-Major Event Days (MED) involving overhead transmission circuits divided by total circuit miles of overhead transmission lines x 1,000, in HFTD Areas in a calendar year.

2. Introduction of Metric

This metric is a measure of how Pacific Gas and Electric Company (PG&E or the Company) provides safe and reliable electric services to its customers. It is also a measure of how available PG&E's Electric Transmission (ET) grid is to the market for the buying and selling of electricity as managed by the California Independent System Operator (CAISO).

This metric is associated with PG&E's Failure of ET Overhead Asset Risk and Wildfire Risk, which are part of the Company's 2020 Risk Assessment and Mitigation Phase Report filing.

3. Audit Results

In the Audit Report, Metric 3.4 received a Metric Accuracy Finding of "Minor."[1] The finding for this metric was based on verification of Metric

[1] Audit Report, p. 8, Table 1-1.

Results for Wires Down events in 2022 Safety and Operational Metrics (SOM) reporting.[2] The finding has been resolved.

The corrections implemented include: verifying the correct HFTD designation was reported in previous filings for reporting years 2021 through 2024 inclusive, correcting any errors discovered, and adjusting annual performance and targets, if applicable. The only correction was with the 2022 data which is reflected in this report filing.

B. (3.4) Metric Performance

1. Historical Data (2013 – June 2025)

Historical performance for this metric cover periods 2013 through June 2025. Although PG&E started measuring wire down events in 2012, 2013 was the first full year uniformly measuring the number of transmission wire down incidents. This metric is normalized by the transmission circuit miles within Tier 2 and Tier 3 HFTDs. The HFTD boundaries are a recent development and were not defined for several years within the historical data timeframe. Hence, for all years prior to and including 2022, PG&E uses 5,525.9 overhead transmission circuit miles in Tier 2/3 HFTD areas and assumes any variances in prior years are negligible. Moving forward, HFTD mileage will be refreshed at the beginning of each year. Table 3.4-1 provides the HFTD miles used for each year.

TABLE 3.4-1
HFTD MILES

Line No.	Year	HFTD Miles
1	Prior to 2023	5525.9
2	2023	5437.7
3	2024	5402.3
4	2025	5377.4

2. Data Collection Methodology

Unplanned ET outages are documented by PG&E's Transmission Operations Department using its Transmission Operations Tracking &

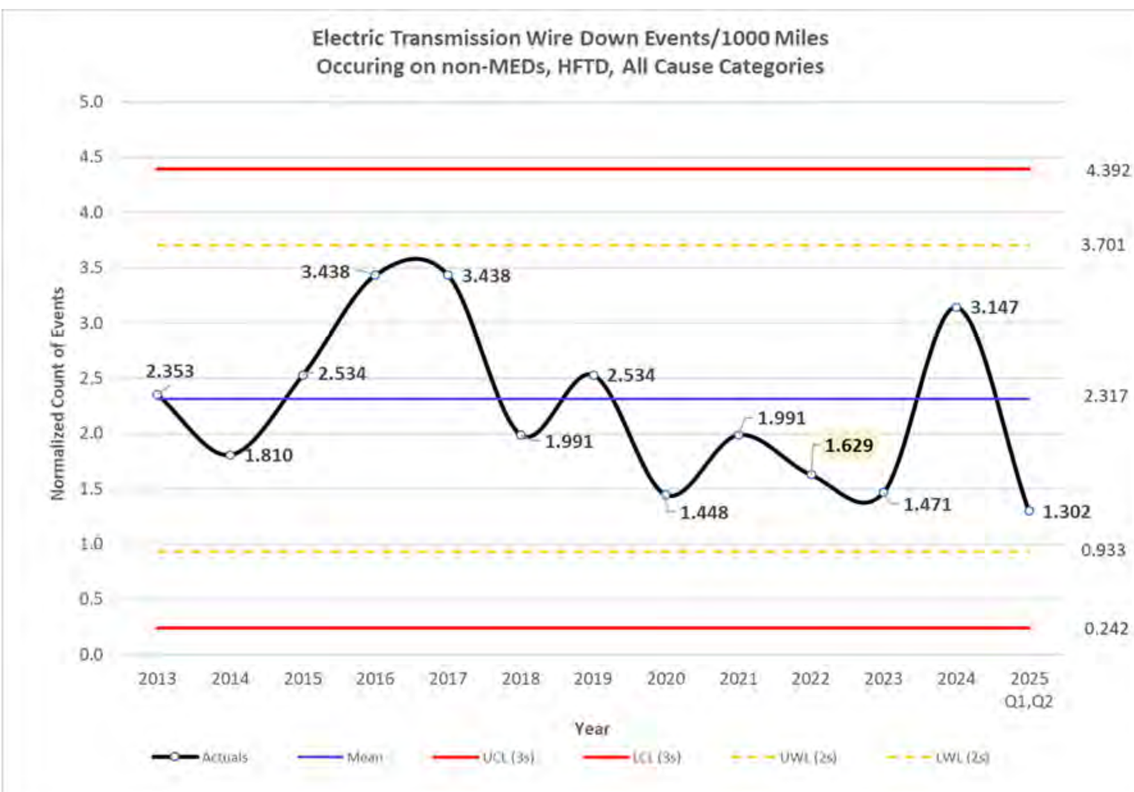
[2] Audit Report, p. 99.

Logging (TOTL) application. If distribution-served customers are affected by a particular transmission wire down event, the data captured in TOTL is merged with respective data from PG&E's distribution outage reporting application (Integrated Logging Information System) in a separate dataset known as the Transmission Outage database. PG&E uses the Lat/Long of the device used to operate/isolate the involved line section as a proxy, supplemented with findings from fault patrols, and then uses its Electric Transmission Geographic Information System application to determine if that point is in a Tier 2 or Tier 3 HFTD area.

3. Metric Performance for the Reporting Period

Figure 3.4-1 below is a control chart showing historical annual performances through June 2025. For the reporting period, the metric performance is 1.302.

FIGURE 3.4-1
ELECTRIC TRANSMISSION WIRES DOWN EVENTS OCCURRING ON NON-MEDS PER 1,000 CIRCUIT MILES HFTD
2013-JUNE 2025



C. (3.4) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

Due to a correction to the 2022 data, the annual performance was recalculated to be 1.629 compared to the 1.448 previously reported. As 2022 performance is included in defining the historical range, there is a small adjustment to the 1-year and 5-year targets since the last SOMs report filing. The methodology of arriving at these targets remains unchanged and is described below. The new target is to remain below 4.392. The previous target was 4.440.

2. Target Methodology

All systems and processes and their outputs exhibit variability. Control charts help monitor variability and can be used to differentiate common causes of variability from special causes. Common, or chance, causes are numerous small causes of variability that are inherent to a system and operate randomly. Special, or assignable, causes can have relatively-large effects on the process and may lead to a state that is out of statistical control.

PG&E's control charts are set up using a static time window of 2013-2022. Using the actual data from those years allows us to calculate the following values that are used in the control charts:

- Mean: Average value of the metric.
- Standard Deviation: Amount of variation of the metric calculated by taking the square root of the variance of the dataset.
- Upper Control Limit (UCL): The maximum value that can be attributed to natural fluctuations calculated by mean plus 3 standard deviations.
- Lower Control Limit (LCL): The minimum value that can be attributed to natural fluctuations calculated by mean minus 3 standard deviations.
- Upper Warning Limit (UWL): The warning value that should raise a flag to take a proactive response to prevent the metric from approaching the UCL calculated by mean plus 2 standard deviations.
- Lower Warning Limit (LWL): The warning value that should raise a flag to take a proactive response to prevent the metric from approaching the LCL calculated by mean minus 2 standard deviations.

The probability that a point falls above the UCL, which for most control chart designs, is approximately 0.00135 and an indicator of significant process degradation if only common causes are operating. It is therefore unlikely to have performance fall beyond the control limits when no special cause is operating.

To establish the 1-Year and 5-Year targets, PG&E considered the following:

- Historical Data and Trends: 1-Year and 5-Year Targets are set to maintain performance within a 3-standard deviation range using the available historical data. A 3-standard deviation remains consistent with other ET external report filings with the CAISO.
- Benchmarking: Not available to the best of our knowledge;
- Regulatory Requirements: None;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The target for this metric is suitable for Enhanced Oversight and Enforcement as it suggests that future results will remain within the historic performance levels;
- Attainable Within Known Resources/Work Plan: Metric targets are attainable within known resources, however this metric is impacted by the variability in conditions outside of PG&E's control, such as the severity of inclement weather on days that do not register as MEDs; and
- Other Considerations: None.

3. 2025 Target

Not to exceed 4.392 (UCL), which represents maintaining within a 3-standard deviation range.

4. 2029 Target

Not to exceed 4.392 (UCL), which represents maintaining within a 3-standard deviation range.

D. (3.4) Performance Against Target

1. Progress Towards the 1-year Target

In the first two quarters of 2025, PG&E experienced seven wire down events per 1,000 circuit miles in HFTDs on non-MEDs resulting in a performance of 1.302.

2. Progress Towards the 5-year Target

As discussed in Section E below, PG&E is deploying a number of programs to maintain or improve long-term performance of this metric to meet the Company's 5-year performance target.

E. (3.4) Current and Planned Work Activities

Wire down events can be caused by a variety of factors, including, but not limited to asset failure, third-party contact, or vegetation contact. The following work activities may provide future resiliency for certain wire down event causes, though the effectiveness of the work is dependent upon the circumstances of the wire down event (e.g., new assets may still be prone to a wire down event that occur due to extreme weather events outside of standard design guidance).

- Asset Inspection: Please see Section 8.1.3.1, p. 476, "Asset Inspections – Transmission" in PG&E's 2023-2025 Wildfire Mitigation Plan (WMP) R6.[3]
- Asset Repair and Replacement: Please see Section 8.1.4, p. 502, "Equipment Maintenance and Repair" in PG&E's 2023-2025 WMP R6.[3]
- Vegetation Inspection: Please see Section 8.2.2.1, p. 661 "Vegetation Inspection – Transmission", in PG&E's 2023-2025 WMP R6.[3]
- Integrated Vegetation Management: Please see Section 8.2.2.1.3, p. 668, "Integrated Vegetation Management (IVM)" in PG&E's 2023-2025 WMP R6.[3]
- Routine Nuclear Energy Regulatory Commission (NERC) and Non Routine NERC: Please see Section 8.2.2.1.1, p. 663, "Routine Transmission NERC and Non-NERC" in PG&E's 2023-2025 WMP R6.[3]

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3 PG&E's 2023-2025 Wildfire Mitigation Plan R6.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.5

WIRES DOWN RED FLAG WARNING DAYS IN HFTD AREAS

(DISTRIBUTION)

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.5
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SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.5
WIRES DOWN RED FLAG WARNING DAYS IN HFTD AREAS (DISTRIBUTION)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.5) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 3.5 – Wires Down Red Flag Warning (RFW) Days in High Fire Threat District (HFTD) Areas (Distribution) is defined as:

Number of Wires Down events in HFTD Areas on RFW Days involving overhead (OH) primary distribution circuits divided by RFW Distribution Circuit-Mile Days in HFTD Areas, in a calendar year.

2. Introduction of Metric

This metric measures the number of distribution wire down events located in the Tier 2 and Tier 3 HFTD areas that occurred on RFW Days and is divided by sum of days and line miles (of the Tier 2 and Tier 3 HFTD OH distribution line miles involved on each RFW Day).

In 2012, Pacific Gas and Electric Company (PG&E or the Company) initiated the Electric Wires Down Program, including introduction of the electric wires down metric, to advance the Company's focus on public safety by reducing the number of electric wire conductors that fail and result in contact with the ground, a vehicle, or other object.

This metric is associated with our Failure of Electric Distribution OH Asset Risk and Wildfire Risk, which are part of our 2024 Risk Assessment and Mitigation Phase Report (RAMP) filing.

3. Audit Results

In the Audit Report, Metric 3.5 received a Metric Accuracy Finding of "Significant." The Other Findings for this metric were "ILIS as the database of record impacts event counts."[1] These findings have not been resolved and are in progress.

The corrections implemented include enhancements to existing processes whereby outage data, specifically Global Positioning System Open Point latitude and longitude coordinates provided in Integrated Logging Information System (ILIS), are combined with the HFTD definition in our Electric Distribution Geographic Information System to identify outages in the HFTD. This reanalysis enables improved spatial alignment of outages and wires down events with HFTD designations. For this reporting period, corrected HFTD designations have been applied to both historical and current outages and wires down event data from 2013 through June 2025. The findings are expected to be resolved with an automated data set by Q4 2025. This is part of a multi-year PG&E plan to align its reliability reporting practices with the IEEE 1366-2022 standard.

B. (3.5) Metric Performance

1. Historical Data (2013 – June 2025)

Historical performance for wire down events on RFW Days within HFTD areas cover periods 2013 through June 2025. Metric performance for these years has been updated to reflect wire down events within HFTD areas, using corrected HFTD designations (see Figure 3.5-1 below). Historical metric performance has consistently remained below target thresholds.

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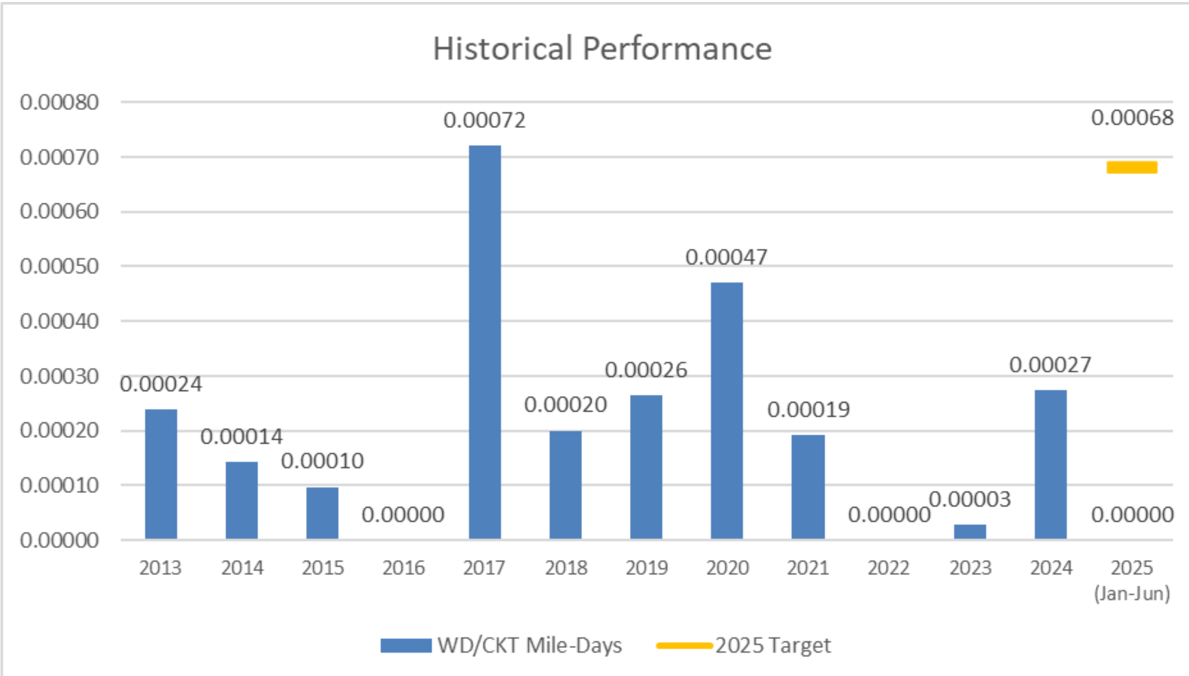
1 Audit Report, p. 8, Table 1-1.

FIGURE 3.5-1
HISTORICAL PERFORMANCE
WIRES DOWN HFTD (RFW DAYS)
(2013-JUNE 2025)



Note: The data in this figure is subject to change based on continuing review of prior period outages.

2. Data Collection Methodology

PG&E uses its ILIS – Operations Database to track and count the number of wire down incidents, as well as its Electric Distribution Geographical Information System (EDGIS) to determine if the wire down incident was in an HFTD locations. Although the outage database does not specifically identify precise location of the downed wire, the Latitude and Longitude (e.g., Lat/Long) of the device is used to isolate the involved electric power line section as a proxy. We also use our EDGIS application to determine if that device (via: Lat/Long information) is in the HFTD (e.g., Tier 2 or Tier 3 location). We have improved our existing processes and transmitted the Lat/Long to our Data & Analytics team to spatially align the wire down events against EDGIS to report accurate HFTD designations. Outage information is entered into ILIS by our electric distribution operators based on information from field personnel and devices such as Supervisory

Control and Data Acquisition alarms and SmartMeter™[2] devices. We last upgraded our outage reporting tools in 2015 and integrated SmartMeter information to identify potential outage reporting errors and to initiate a subsequent review and correction.

PG&E defines the number of wire down events as the number of outages caused by one or more wire down faults. For example, if a single wire down fault causes two protective devices to operate, such as a Line Recloser momentary trip and a downstream fuse burning open, this will be recorded as two separate outages and two wire down events. Alternatively, one protective device operating for a fault caused by multiple spans or phases of wire coming down, will be recorded as one wire down event. This is due to limitations of what can be recorded in the outage logging system. While we are not making any immediate changes to our reporting process, we are evaluating our procedure to determine if our calculation of this metric can be adjusted to address these limitations.

PG&E's meteorology group maintains a database tracking RFW dates, time, and involved areas and determines RFW Circuit Miles Days as follows:

- The National Weather Service (NWS) will issue a RFW and their associated polygons under specific polygon/shapefiles called Fire Zones.
- PG&E's geographic information system team has calculated all OH Distribution and Transmission lines for all the Fire Zone shapefile boundaries that intersect PG&E territory. For each NWS Fire Zone PG&E has the number of OH line miles for Distribution and Transmission and the number of OH line miles for Transmission, which is then also split into the specific HFTD and non HFTD tiers and zones.
- Meteorology then compiles all the archived RFW shapefiles for California, and from all the RFW events, determines which zones there was a RFW under and the duration of time it lasted.
- RFW Circuit Mile Days= RFW days x Circuit line miles.

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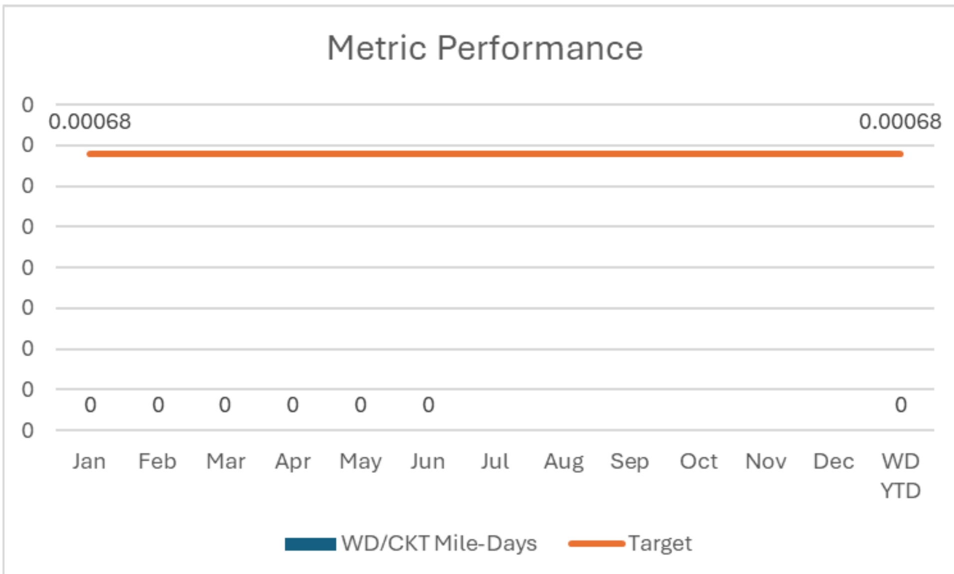
[2] SmartMeter is a PG&E registered trademark. All further references to SmartMeters in PG&E's testimony in this proceeding should be assumed to refer to the trademarked name, without continually using the ™ symbol, consistent with legally-acceptable practice.

3. Metric Performance for the Reporting Period

Metric performance for this reporting period recorded zero wire down events in HFTD areas on RFW Days involving OH primary distribution circuits (See Figure 3.5-2 below).

FIGURE 3-2
METRIC PERFORMANCE
WIRES DOWN EVENTS/RFW CIRCUIT MILE-DAYS HFTD
JAN-JUN 2025



C. (3.5) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

Directional 1- and 5-year targets have been updated to 0.00068 to account for an increase in wire down events resulting from corrected HFTD designations. Target methodology remains unchanged since the last report.

2. Target Methodology

- Directional Only: Maintain (stay within historical range, and assumes response stays the same in events);

  Based on the historical performance of this metric, PG&E interprets "Maintain" as staying within two standard deviations from the 10-year average. This equates to an upper limit of 0.00068 (as shown in Figure 3.5-2).

- Historical Data and Trends: This metric is expected to remain within the historical performance levels, but will vary based on the number of RFWs and severity of weather experienced in a year;
- Benchmarking: Not available to the best of our knowledge;
- Regulatory Requirements: None;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The directional target for this metric is suitable for Enhanced Oversight and Enforcement as it states performance will remain within the historical range which accounts for unknown factors which may vary, such as the frequency and severity of weather;
- Attainable Within Known Resources/Work Plan: Yes, targets are attainable within known resources, however this metric is impacted by the variability in conditions outside of PG&E's controls, such as the volume and severity of weather on RFWs;
- Other Considerations: None.

3. 2025 Target

The updated 2025 target is 0.00068, which accounts for an increase in wire down events resulting from corrected HFTD designations. This target maintains within historical performance levels.

4. 2029 Target

The updated 2029 target is the same as the 1-year target and is expected to maintain within historical performance levels.

D. (3.5) Performance Against Target

1. Progress Towards the 1-year Target

Metric performance towards the 1-year target recorded zero wire down events on RFW Days involving OH primary distribution circuits (See Figure 3.5-2 above). If favorable weather persists, metric performance is expected to remain below the 2025 target threshold.

2. Progress Towards the 5-year Target

PG&E's commitment to public safety and service reliability drives the initiatives, programs, and work efforts mentioned in Section E below.

E. (3.5) Current and Planned Work Activities

PG&E will continue to execute many ongoing activities to reduce wires down, including the following programs:

- Asset Replacement (Overhead, Underground): Please see Section 8.1.3.2.5, p. 493, "Overhead Equipment Inspections" in PG&E's 2023-2025 Wildfire Mitigation Plan (WMP) R6.[3]
- Grid Design and System Hardening: Please see Section 8.1.2, p. 398, "Grid Design and System Hardening" in PG&E's 2023-2025 WMP R6.[3]
- Downed Conductor Detection: Please see Section 8.1.2.10.1, p. 461, "Downed Conductor Detection Devices" in PG&E's 2023-2025 WMP R6.[3]
- Overhead/Underground Critical Operating Equipment Replacement Work: Please see Section 8.1.4, p. 502, "Equipment Maintenance and Repair" in PG&E's 2023-2025 WMP R6.[3]
- Vegetation Management: Please see Section 8.2, p. 602, "Vegetation Management, and Inspections" in PG&E's 2023-2025 WMP R6.[3]

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3 PG&E's 2023-2025 WMP R6.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.6

WIRES DOWN RED FLAG WARNING DAYS IN HFTD AREAS

(TRANSMISSION)

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
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WIRES DOWN RED FLAG WARNING DAYS IN HFTD AREAS
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WIRES DOWN RED FLAG WARNING DAYS IN HFTD AREAS (TRANSMISSION)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.6) Overview

1. Metric Definition

Safety and Operational Metric 3.6 – Wires Down Red Flag Warning Days in High Fire Threat District *(*HFTD) Areas (Transmission) is defined as:

Number of Wires Down events in HFTD Areas on Red Flag Warning (RFW) Days involving overhead (OH) transmission circuits divided by RFW Transmission Circuit-Mile Days in HFTD Areas, in a calendar year.

2. Introduction of Metric

This metric measures the count of Transmission Wire Down events occurring on RFW Days and provides a partial indicator for electric system safety and overall electric service reliability for end-use customers.

This metric is associated with Pacific Gas and Electric Company's (PG&E or the Company) Failure of Electric Transmission Overhead Asset Risk and Wildfire Risk, which are part of the Company's 2020 Risk Assessment and Mitigation Phase Report filing.

3. Audit Results

In the Audit Report, Metric 3.6 received a Metric Accuracy Finding of "None." There were no Other Findings for this metric.[1]

B. (3.6) Metric Performance

1. Historical Data (2013 – June 2025)

Historical data for this metric cover periods 2013 through June 2025. Although PG&E started measuring wire down events in 2012, 2013 was the first full year uniformly measuring the number of transmission wire down

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1 Audit Report, p. 8, Table 1-1.

incidents. When calculating this metric, both the HFTD OH line miles and number of wires down events are measured based on the area subjected by each specific RFW Day event and summed for each specific year.

The HFTD boundaries are a recent development and were not defined for several years. Hence, for all years prior to and including 2022, PG&E uses 5,525.9 OH transmission circuit miles in Tier 2/3 HFTD areas and assumes any variances in prior years are negligible. Moving forward, HFTD mileage will be refreshed at the beginning of each year. Table 3.6-1 provides the HFTD miles used for each year.

TABLE 3.6-1
HFTD MILES

Line No.	Year	HFTD Miles
1	Prior to 2023	5525.9
2	2023	5437.7
3	2024	5402.3
4	2025	5377.4

2. Data Collection Methodology

Unplanned ET outages are documented by PG&E's Transmission Operations Department using its Transmission Operations Tracking & Logging (TOTL) application. If distribution-served customers are affected by a particular transmission wire down event, the data captured in TOTL is merged with respective data from PG&E's distribution outage reporting application (Integrated Logging Information System) in a separate dataset known as the Transmission Outage database. PG&E uses the Lat/Long of the device used to operate/isolate the involved line section as a proxy, supplemented with findings from fault patrols, and then uses its Electric Transmission Geographic Information System application to determine if that point is in a Tier 2 or Tier 3 HFTD area.

The meteorology group maintains a database with the RFW days/time and involved areas and determines RFW Circuit Miles Days as follows:

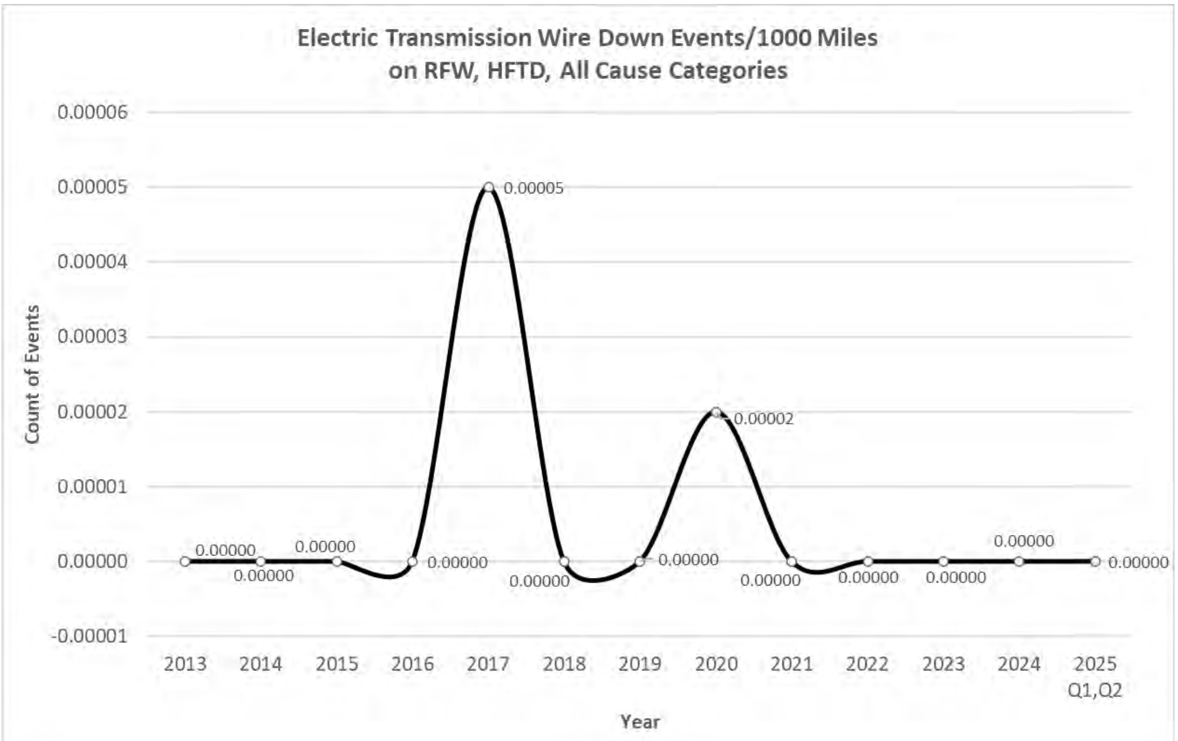
- The National Weather Service (NWS) will issue a RFW and their associated polygons under specific polygon/shapefiles called Fire Zones;

- PG&E's geographic information system team has calculated all OH Distribution and Transmission lines for all of the Fire Zone shapefile boundaries that intersect PG&E territory. For each NWS Fire Zone PG&E has the number of OH line miles for Distribution and Transmission and the number of OH line miles for Transmission, which is then also split into the specific HFTD and non HFTD tiers and zones;
- Meteorology then compiles all the archived RFW shapefiles for California, and from all the RFW events, determines which zones there was a RFW under and the duration of time it lasted; and
- RFW Circuit Mile Days= RFW days x Circuit line miles.

3. Metric Performance for the Reporting Period

Figure 3.6-1 below shows the historical annual performance of transmission wire down events on RFW days per circuit mile days through June 2025. There were zero transmission wires down events on RFW days in the first two quarters of 2025.

FIGURE 3.6-1
ELECTRIC TRANSMISSION
WIRES DOWN INCIDENTS PER RFW/CIRCUIT MILE-DAYS (2013-JUNE 2025)



C. (3.6) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

There are no updates to the directional 1- and 5-Year Targets since last report and are set maintain performance within the historical range.

2. Target Methodology

- Directional Only: Maintain (stay within historical range, and assumes response stays the same in events);

  Note that there has not been enough historic electric transmission (ET) wire down events on RFW days to establish a target based on prior performance.
- Benchmarking: Not available to the best of our knowledge;
- Regulatory Requirements: None;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The directional target for this metric is suitable for

Enhanced Oversight and Enforcement as it suggests performance will remain within the historical range;

- Attainable Within Known Resources/Work Plan: Unknown, however this metric is impacted by the variability in conditions outside of PG&E's control, such as the severity of weather on RFWs; and
- Other Considerations: None.

3. 2025 Target

Maintain performance within historical range.

4. 2029 Target

Maintain performance within historical range.

D. (3.6) Performance Against Target

1. Progress Towards the 1-Year Target

As demonstrated in Figure 3.6-1, PG&E experienced zero transmission wires down events on RFW Days which is consistent with Company's 1-year directional target.

2. Progress Towards the 5-Year Target

As discussed in Section E below, PG&E is deploying a number of programs to maintain or improve long-term performance of this metric to align with the Company's 5-year directional performance target.

E. (3.6) Current and Planned Work Activities

Wire down events can be caused by a variety of factors, including but not limited to asset failure, third-party contact, or vegetation contact. The following work activities may provide future resiliency for certain wire down event causes, though the effectiveness of the work is dependent upon the circumstances of the wire down event (e.g., new assets may still be prone to a wire down event that occur due to extreme weather events outside of standard design guidance).

- Asset Inspection: Please see Section 8.1.3.1, p. 476, "Asset Inspections – Transmission" in PG&E's 2023-2025 Wildfire Mitigation Plan (WMP) R6.[2]
- Asset Repair and Replacement: Please see Section 8.1.4, p. 502, "Equipment Maintenance and Repair" in PG&E's 2023-2025 WMP R6.[2]

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2 PG&E's 2023-2025 WMP R6

- Vegetation Inspection: Please see Section 8.2.2.1, p. 661 "Vegetation Inspection – Transmission", in PG&E's 2023-2025 WMP R6.[2]
- Integrated Vegetation Management: Please see Section 8.2.2.1.3, p. 668, "Integrated Vegetation Management (IVM)" in PG&E's 2023-2025 WMP R6.[2]
- Routine NERC & Non Routine NERC: Please see Section 8.2.2.1.1, p. 663, "Routine Transmission NERC and Non-NERC" in PG&E's 2023-2025 WMP R6.[2]

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.7

MISSED OVERHEAD DISTRIBUTION PATROLS IN HFTD AREAS

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SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.7
MISSED OVERHEAD DISTRIBUTION PATROLS IN HFTD AREAS

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.7) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 3.7 – Missed Overhead (OH) Distribution Patrols in High Fire Threat District (HFTD) is defined as:

Total number of overhead electric distribution structures that fell below the minimum patrol frequency requirements divided by the total number of overhead electric distribution structures that required patrols, in HFTD area in past calendar year. "Minimum patrol frequency" refers to the frequency of patrols as specified in General Order (GO) 165. "Structures" refer to electric assets such as transformers, switching protective devices, capacitors, lines, poles, etc.

2. Introduction of Metric

Patrols involve simple visual observations to identify obvious structural problems and hazards affecting safety or reliability. Within HFTD, nonconformances identified by patrols can involve conditions that represent a wildfire ignition risk. Performing required patrols on time ensures that nonconformances are identified in a timely manner so that they can be prioritized for repair in accordance with the risk of the condition.

Prior to year 2014, General Order (GO) 165 required that patrols be completed any time between January 1 and December 31 each year.

Starting in 2015 and through 2019, Pacific Gas and Electric Company (PG&E or the Company) implemented the new GO 165 requirement to complete patrols each year within a prescribed timeframe, based on the date of the last patrol or inspection. PG&E's interpretation and implementation of this new language calculated the due date for each patrol each year as follows:

- The due date for each map is based on the date the map was last inspected or patrolled;
- Inspections or patrols may not exceed three additional months past the previous inspection or patrol date (12+3 months maximum);
- Inspections or patrols may be performed before the due date;
- Inspections or patrols are performed by the end of the calendar year (12/31/YY); and
- The start of an inspection or a patrol starts a new inspection or patrol interval that must be completed within the prescribed timeframe.

For the years 2020 and 2021, PG&E shifted away from the "12+3" due date for completing patrols, with the intent of wildfire risk reduction by focusing on the High Fire Threat District areas and using new risk models to inform the prioritization of patrols. PG&E completed patrols by static due dates, August 31 for HFTD areas, and December 31 for Non-HFTD areas.

In 2022, PG&E completed OH patrols and inspections in compliance with GO 165. As of 2024, PG&E continues to complete patrols and inspections in compliance with GO 165 (12+3).

3. Audit Results

In the Audit Report, Metric 3.7 received a Metric Accuracy Finding of "Significant."[1] This finding was based on a conclusion that manual calculation of asset inspection due dates across multiple program years and strategies led to data errors.[2] The finding has been resolved, actions taken to date are listed below.

The following corrective actions are currently in place: Due dates for 2024/2025 have been reviewed and corrected per GO 165 and Wildfire Mitigation Plan (WMP) via peer review. These corrections are reflected in this report.

In addition, the following procedural improvements are being implemented. Updated 2025 guidance and training clarify inspection and patrol intervals and necessary steps to be taken to identify a "last patrol" when faced with Geographic Information System issues and standardized

1 Audit Report, p. 8, Table 1-1.

2 Audit Report, p. 118-119.

reporting formats are being set for WMP and SOMs, with personnel trained on new guidelines. In addition, we will move to digitized patrols by December 1, 2026.

B. (3.7) Metric Performance

1. Historical Data (2015 – June 2025)

To be consistent with the implementation of new GO 165 requirements, historical data begins in 2015.[3] The 2015-2019 data include systemwide results. The 2021-2025, data includes HFTD specific results.

Prior to 2020, PG&E completed patrols on paper by "plat map". Each plat map had a calculated "12+3" due date based on the start date of the last patrol or inspection for that plat map. For the years 2015-2019, PG&E tracked and measured performance of patrols based on the "12+3" calculated due date for each *plat map*. Performance was tracked using detailed excel spreadsheets for each of the 19 Divisions across the system, and SAP data recorded for each plat map, which recorded the actual start and end dates for each plat map, as well as actual units and the PG&E LAN ID (login ID) of the Inspector who completed the work. PG&E's annual performance for completing patrols in these years was 0.00 percent completed late.

For the years 2020 and 2021, PG&E's performance was impacted by the shift away from completing OH patrols by the "12+3" calculated due dates to the use of a risk-based prioritization approach and focus on HFTD with the intention of wildfire risk reduction.

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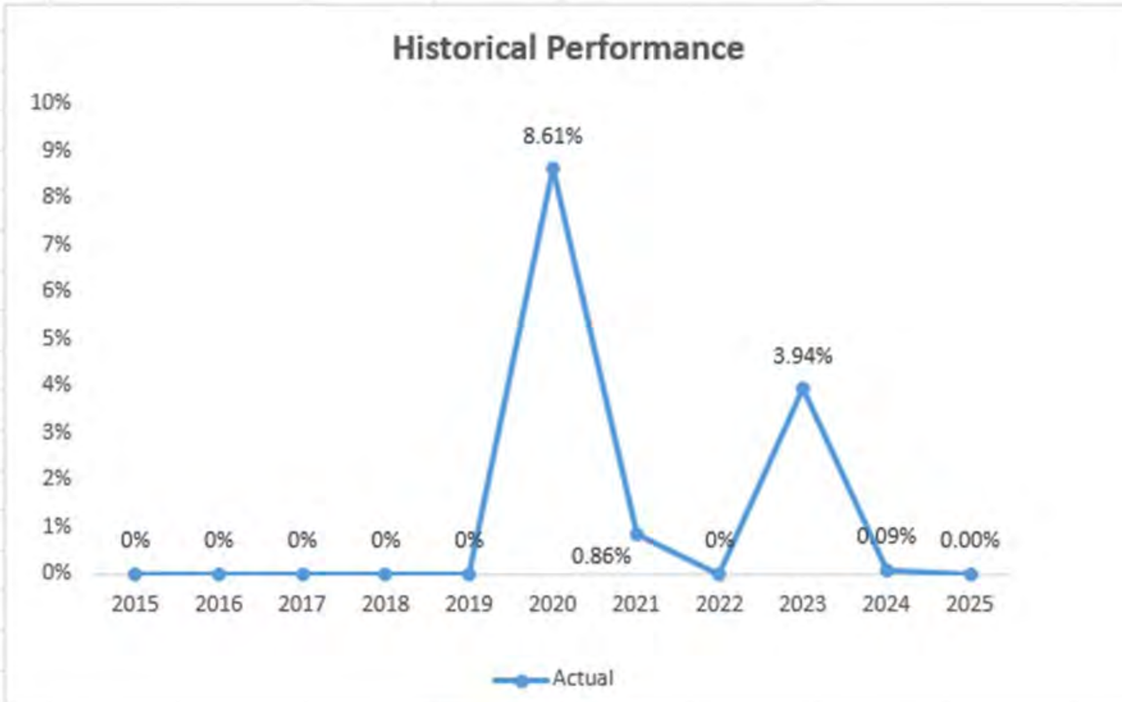
3 Historical patrol data is at plat map level vs. structure level. We are further validating plat-based results for HFTD vs. NHFTD units, we may see slight changes to volumes completed late vs. on time, or vice-versa.

FIGURE 3.7-1
HISTORICAL PERFORMANCE
(2015-2025 (JAN-JUNE))



Note: Actual performance as follows between 2015-June 2025: 2015: 0.0003 percent, 2016: 0.0003 percent, 2017: 0.0000 percent, 2018: 0.0002 percent, 2019: 0.0015 percent. 2020: 8.61 percent, 2021: 0.86 percent, 2022: 0.00 percent 2023: 3.94 percent, 2024: 0.09 percent and 2025: 0.0000%.

2. Data Collection Methodology

The currently used data collection methodology was implemented in 2020. It uses a mobile platform for completing OH inspections, recorded at structure (pole) level using a detailed inspection checklist. PG&E also shifted its maintenance plan structure in SAP from purely plat -map based to circuit/risk based, tracking performance at *structure -level*.

PG&E continues to perform OH patrols on paper, with a goal of shifting to mobile technology over the next few years. OH Patrols are tracked at “maintenance plan” level, using excel spreadsheets and SAP data.

3. Metric Performance for the Reporting Period

Between 2015-2019, PG&E’s annual performance for completing patrols by the California Public Utilities Commission (CPUC) “12+3” due date was 0 percent completed late. These results demonstrate our commitment to meet GO 165 CPUC “12+3” due dates.

For the years 2020 and 2021, with the shift to a wildfire risk reduction focused approach and away from completing OH patrols by the "12+3" calculated due date, PG&E's metric performance was 8.61 percent completed late in 2020, 0.86 percent completed late in 2021 and 0 percent were completed late in 2022. For 2023, 3.94 percent were completed late. For 2024, there were 543 late overhead patrols which equate to a percentage of 0.09 percent completed late. There were three late overhead patrols that was reported in the March 2025 report. However, the number of late overhead patrols was corrected to 543.There were due date errors as a result of calculation errors that resulted in a percent change from 0 to 0.09. In 2025, there were 0 late overhead patrols which equates to 0 percent completed late.

C. (3.7) 1-Year and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

There have been no changes to the 1-year and 5-year targets since the last SOMs filing.

2. Target Methodology

To establish the 1-year and 5-year targets, PG&E considered the following factors:

- Historical Data and Trends: Based on historical performance of 0 percent completed late (2015-2019) and the results of the more recently used wildfire risk reduction approach (2020-2023). In 2024 PG&E improved performance by completing OH patrols to (1) be in compliance with GO 165, with a target range of 0-4 percent completed late, and (2) incorporate Asset Strategy risk models.
- Benchmarking: Not available;
- Regulatory Requirements: GO 165;
- Attainable Within Known Resources/Work Plan: Targeted performance is attainable within PG&E's currently known resource plan;
- Appropriate/Sustainable Indicators for Enhanced Oversight Enforcement: The target range is a suitable indicator for Enhanced Oversight and Enforcement as it intends to return PG&E to historical

levels of near-zero percent noncompliance while also incorporating reasonable impacts resulting from access and other field issues; and

- Other Qualitative Considerations: None.

3. 2025 Target

The 2025 target is 0-4 percent to maintain performance compared to 2024.

4. 2029 Target

The 2029 target is 0-1 percent to improve performance compared to 2024, based on the factors described above, and the commitment to continuously improve performance.

D. (3.7) Performance Against Target

1. Progress Towards the 1-Year Target

As demonstrated in Figure 3.7-2 below, PG&E continued to maintain performance within the 0-4 percent target range set for 2024. For 2024, there were 543 late overhead patrols which equate to a percentage of 0.09 percent completed late. The metric performance has shown tremendous improvement from 3.94 percent in 2023. The spike in 2023 was due to incorrect calculation of due dates for Distribution OH Patrols which were identified and corrected. In 2025, there were 0 late overhead patrols which equate to 0 percent completed late.

2. Progress Towards the 5-Year Target

As discussed in Section E below, PG&E has a number of programs to improve the long-term performance of this metric and to meet the Company's 5-year performance target.

FIGURE 3.7-2
HISTORICAL PERFORMANCE
(2015-JUNE 2025 AND TARGETS (2025-2029))

E. (3.7) Current and Planned Work Activities

- Visibility and Compliance: Currently Supervisors and Inspectors could see the CPUC due dates for each patrol package to ensure understanding as to the due date of the OH patrol.
- Tracking:
  - System Inspections track progress and completion of OH patrols on a continuous basis, using detailed excel tracking spreadsheets + SAP data;
  - System Inspections track and report-out on any “late” OH patrols, including identifying mitigating factors and implementing process improvements or changes to the program; and
  - System Inspections track timeliness of patrols being completed on their weekly scorecard.
- Training: System Inspections conduct refresher training to ensure understanding of the importance of patrols in identifying obvious structural problems and hazards in years where an inspection is not required.

- Maintenance Plan Management Tool: System Inspections Maintenance Planners complete timely review and completion of changes to structures and maintenance plans using the maintenance plan management tool.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.8

MISSED OVERHEAD DISTRIBUTION INSPECTIONS IN

HFTD AREAS

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The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.8) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 3.8 – Missed Overhead Distribution Detailed Inspections in HFTD Areas is defined as:

Overhead Distribution Detailed Inspections in High Fire Threat District (HFTD): Total number of structures that fell below the minimum inspection frequency requirements divided by the total number of structures that required inspection, in HFTD area in past calendar year. "Minimum inspection frequency" refers to the frequency of scheduled inspections as specified in General Order (GO) 165. "Structures" refers to electric assets such as transformers, switching protective devices, capacitors, lines, poles, etc.

2. Introduction of Metric

Detailed inspections are performed to identify nonconformances affecting safety or reliability. Within HFTD, nonconformances identified by inspections can involve conditions that represent a wildfire ignition risk. Performing required inspections on time ensures that non-conformances are identified in a timely manner so that they can be prioritized for repair in accordance with the risk of the condition.

Prior to year 2014, GO 165 required that inspections be completed any time between January 1 and December 31 each year.

Starting in 2015 and through 2019, PG&E implemented the new GO 165 requirement to complete inspections each year within a prescribed timeframe, based on the date of the last patrol or inspection. Pacific Gas and Electric Company's (PG&E or the Company) interpretation and implementation of this new language calculated the due date for each patrol or inspection each year as follows:

- The due date for each map is based on the date the map was last inspected or patrolled;
- Inspections or patrols may not exceed three additional months past the previous inspection or patrol date (12+3 maximum);
- Inspections or patrols may be performed before the due date;
- Inspections or patrols are performed by the end of the calendar year (12/31/XX); and
- The start of an inspection or a patrol starts a new inspection or patrol interval that must be completed within the prescribed timeframe.

For the years 2020 and 2021, PG&E shifted away from the “12+3” due date for completing inspections with the intent of wildfire risk reduction by focusing on the HFTD areas and using new risk models to inform the prioritization of inspections each year. PG&E completed inspections by the static due dates of, August 31 for HFTD areas, December 31 for Non-HFTD areas.

In 2022, PG&E intends to complete overhead patrols and inspections in compliance with GO 165.

In 2023 and beyond, PG&E will continue to complete patrols and inspections in compliance with GO 165 (12+3).

3. Audit Results

In the Audit Report, Metric 3.8 received a Metric Accuracy Finding of “Significant.”[1] This finding was based on a conclusion that manual calculation of asset inspection due dates across multiple program years and strategies led to data errors.[2] The finding has been resolved, actions taken to date are listed below.

The following corrective actions are currently in place: Due dates for 2024/2025 have been reviewed and corrected per GO 165 and Wildfire Mitigation Plan (WMP via peer review. These corrections are reflected in this report.

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1 Audit Report, p. 8, Table 1-1.

2 Audit Report, p. 128.

In addition, the following procedural improvements have been implemented. Updated 2025 guidance and training clarify inspection and patrol intervals and necessary steps to be taken to identify a “last inspection” when faced with GIS issues and standardized reporting formats are being set for WMP and SOMs, with personnel trained on new guidelines.

B. (3.8) Metric Performance

1. Historical Data (2015 – June 2025)

To be consistent with the implementation of new GO 165 requirements, historical data begins in 2015. The 2015-2019 data include systemwide results. The 2021-2025 data[3] includes HFTD specific results.

Prior to 2020, Pacific Gas and Electric Company (PG&E) completed inspections on paper by plat map. Each plat map had a calculated “12+3” due date based on the start date of the last patrol or inspection for that plat map. For the years 2015-2019, PG&E tracked and measured performance of inspections based on the “12+3” calculated due date for each plat map. Performance was tracked using detailed excel spreadsheets for each of the 19 Divisions across the system, and SAP data recorded for each plat map, which recorded the actual start and end dates for each plat map, as well as actual units and PG&E LAN ID (login ID) of the Inspector who completed the work. PG&E’s annual performance for completion and inspections in these years was 0.01-0.04 percent completed late.

For the years 2020 and 2021, PG&E’s performance was impacted by the shift away from completing overhead inspection by the “12+3” calculated due dates to the use of a risk-based prioritization approach and focus on HFTD with the intention of wildfire risk reduction.

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[3] Historical inspection data <2020 is at plat map level vs. structure level. We are further validating plat map-based results for HFTD vs. NHFTD units, we may see slight changes to volumes completed late vs. on time, or vice-versa.

FIGURE 3.8-1
HISTORICAL PERFORMANCE (2015 – 2025 JAN JUNE)

Note: Full year 2024 has been corrected from 0 to 0.93 percent late. There were due date errors as a result of calculation errors which resulted in the change.

2. Data Collection Methodology

The currently used data collection methodology was implemented in 2020. It uses a mobile platform for completing Overhead inspections, recorded at structure (pole) level using a detailed inspection checklist. PG&E also shifted its maintenance plan structure in SAP from purely plat-map based to circuit/risk based, tracking performance at *structure -level*.

PG&E now tracks the completion of inspections at structure (pole) level, using the "attainment report," which records actual completion information for each structure from actual inspection data recorded in SAP.

3. Metric Performance for the Reporting Period

Between 2015-2019, PG&E's annual performance for completing inspections by the CPUC "12+3" due date was 0 - 4 percent completed late. These results demonstrate our commitment to meet GO 165 CPUC "12+3" due dates.

For the years 2020 and 2021, with the shift to a wildfire risk reduction focused approach and away from completing overhead inspections by the "12+3" calculated due date, PG&E performance worsened to 9.04 percent completed late in 2020 and 4.10 percent completed late in 2021. In 2022, PG&E's performance improved to 0.03 percent completed late. In 2023, there were 10 late overhead inspections out of the 230,491 inspections performed which equates to a percentage of 0 percent. In 2024, there were 94 late overhead inspections out of 10,058 inspections which equate to a 0.93 percent completed late. In 2025, there were 0 late overhead inspections which equate to 0 percent completed late.

C. (3.8) 1-Year and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

There have been no changes to the 1-year and 5-year targets since the last SOMS filing.

2. Target Methodology

To establish the 1-year and 5-year targets, PG&E considered the following factors:

- Historical Data and Trends: Based on historical performance of 1-4 percent completed late (2015-2019) and the results of the more recently used wildfire risk reduction approach (2020-2023). In 2024 PG&E improved performance by completing overhead inspections: (1) be in compliance with GO 165, with a target range of 0-2 percent completed late, and (2) incorporate Asset Strategy risk models;
- Benchmarking: Not available;
- Regulatory Requirements: GO 165;
- Attainable Within Known Resources/Work Plan: Targeted performance is attainable within PG&E's currently known resource plan;
- Appropriate/Sustainable Indicators for Enhanced Oversight Enforcement: The target range is a suitable indicator for Enhanced Oversight and Enforcement as it intends to return PG&E to historical levels of near-zero percent non-compliances while also incorporating reasonable impacts resulting from access and other field issues; and
- Other Qualitative Considerations: None.

3. 2025 Target

The 2025 target is 0-2 percent to maintain performance compared to 2024.

4. 2029 Target

The 5-year target is 0-1 percent to improve performance compared to 2024, based on the factors described above, and the commitment to continuously improved performance.

D. (3.8) Performance Against Target

1. Progress Towards/Deviation From the 1-Year Target

As demonstrated in Figure 3.8-2 below, PG&E observed a 0.93 percent missed overhead Distribution inspections in 2024 which was within the Company's 1-year target. In 2025, there were 0 late overhead inspections which equate to 0 percent completed late.

2. Progress Towards/Deviation From the 5-Year Target

As discussed in Section E below, PG&E has several programs to maintain or improve long-term performance of this metric to meet the Company's 5-year performance target.

FIGURE 3.8-2
HISTORICAL PERFORMANCE (2015 JUNE 2025) AND
TARGETS (2025 AND 2029 TARGET)

E. (3.8) Current and Planned Work Activities

- Visibility and Compliance: Currently Supervisors and Inspectors can see the CPUC due dates for each inspection, so that they can plan work to be completed on time.
- Tracking:
  - System Inspections tracked progress and completion of overhead inspections on a continuous basis, using detailed SAP data reports and excel tracking spreadsheets.
  - System Inspections tracked and reported-out on any overdue overhead inspections, including identifying mitigating factors and implementing process improvements or changes to address gaps.
  - System Inspections tracked timeliness of inspections being completed on their weekly scorecard.
- Training: System Inspections will conduct annual “Refresher” training on overhead inspections, which includes focus on anything that has changed since the previous year (guidance, standards, procedures), including

updates to the INSPECT application, inspection checklists, and associated Inspector job aids.

- Asset Strategy – Monthly Inspection Validations: Monthly inspection validations will continue to identify required additions to the original plan arising from additions or changes to the asset registry.
- Asset Strategy – Ad Hoc Inspections: Asset Strategy will continue to evaluate the asset registry and may identify additional “ad hoc” structures to be inspected each year, based on analysis related to ignition risk, etc.
- Maintenance Plan Management Tool: System Inspections Maintenance Planners will complete timely review and completion of changes to structures and maintenance plans by way of the “maintenance plan management tool.”
- Desktop Quality Control: System Inspections conducts desktop work verification activities on a valid sample size of completed inspections to evaluate the completeness and quality of inspections.
- Quality Control Field Work Verification: System Inspections conducts “blind” field work verification activities on a valid sample size of completed inspections to evaluate the completeness and quality of inspections.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.9

MISSED OVERHEAD TRANSMISSION PATROLS IN HFTD AREAS

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The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.9) Overview

1. Metric Definition

Safety and Operational Metrics (SOM) 3.9 – Missed Overhead Transmission Patrols in High Fire Threat District (HFTD) Areas is defined as:

Overhead (OH) Transmission Patrols in HFTD: Total number of structures that fell below the minimum patrol frequency requirements divided by the total number of structures that required patrols, in HFTD area in past calendar year where, "Minimum patrol frequency" refers to the frequency of patrols requirements, as applicable. "Structures" refers to electric assets such as transformers, switching protective devices, capacitors, lines, poles, etc.

2. Introduction of Metric

Patrols involve simple visual observations to identify obvious non-conformances affecting safety or reliability. Within HFTD areas, nonconformances identified by patrols can involve conditions that represent a wildfire ignition risk. Performing patrols on time allows non-conformances to be identified in a timely manner so that they can be prioritized for repair in accordance with the risk of the condition.

All assets require either a detailed inspection or a patrol each year. While detailed inspections have shifted from circuit-based cycles to an inspection frequency that depends on HFTD and structure-level risk considerations, patrols are performed by circuit. Therefore, any line that does not receive a detailed inspection from end-to-end will require a patrol and it is possible for some structures to receive both an inspection and a patrol in the same year. Patrols may be performed either by air (helicopter) or ground (walking or driving). Compared to transmission detailed inspections, the transmission OH patrol program has not undergone significant changes over the reporting period from 2015-present. Starting in 2021, Pacific Gas and Electric Company (PG&E or the Company) imposed an in-year deadline of July 31 for patrols on circuits containing HFTD or High Fire Risk Area structures. Monthly validations of the inspection plan were started in June 2021, moving to quarterly in 2026, to ensure that all assets were either inspected or patrolled each year, including assets that were newly added to the asset registry. The in-year deadline of July 31 introduced in 2021 for inspections and patrols in HFTD will continue to be used in 2022. Beginning in 2022, assets added to the registry after July 31 or whose HFTD changes after July 31 will not be considered late as in 2021, provided that they are inspected or patrolled within 90 days of the addition to the registry or the HFTD change.

3. Audit Results

In the Audit Report, Metric 3.9 received a Metric Accuracy Finding of "Minor."[1] The finding was based on minor data inaccuracies.[2] The finding has been resolved. The corrections include addressing the following identified discrepancies: HFTD classification errors; Late Patrol criteria ambiguities; duplicate records (the Audit Report found 151 duplicate patrol records across 2021–2023); and Multiple Patrols per asset. These corrections and updates are reflected in this report filing.

B. (3.9) Metric Performance

1. Historical Data (2015 – June 2025)

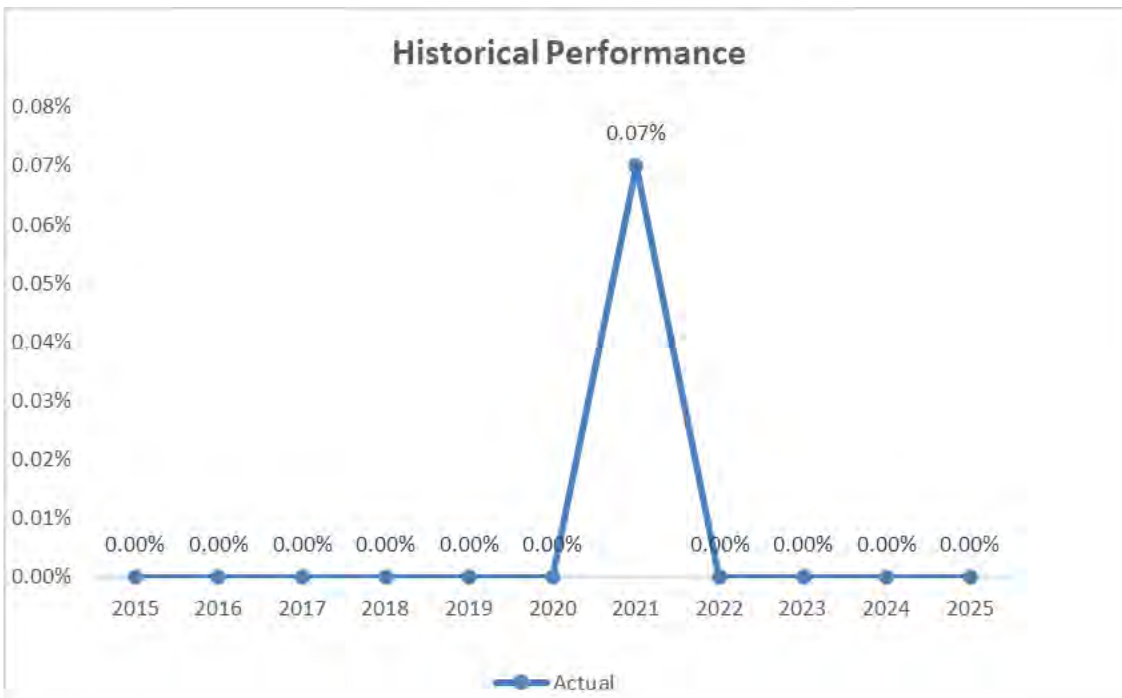
Historical data is provided from 2015 – June 2025. Data provided for 2015-2019 reflects systemwide performance. HFTD-specific performance is not available prior to 2020. The percentage of missed patrols is calculated as the number of patrols not performed by the required deadline divided by the total number of patrols performed for that year. Through 2020, there was not a specific in-year deadline for patrols, so the deadline was considered December 31. The July 31 deadline for HFTD patrols in 2021

1 Audit Report, p. 8, Table 1-1.

2 Audit Report, p. 135.

allowed exceptions due to access issues and weather that may have prevented a helicopter to fly, or where access issues may have prevented a ground patrol. In 2021, HFTD structures added to the asset registry after July 31 and inspected after the July 31 deadline were counted as missed inspections, as well as instances where the asset location was corrected from non-HFTD to HFTD after July 31.

FIGURE 3.9-1
HISTORICAL PERFORMANCE
(2015-JUNE 2025)



2. Data Collection Methodology

Overhead patrols are tracked at the "maintenance plan" level, using data sheets to record completion and findings, if applicable, as well as the SAP data.

3. Metric Performance for the Reporting Period

In 2025 there are no missed patrols resulting in a 0.00 percent missed overhead Transmission patrols with a total of 33,941 patrols completed—18,963 in Tier 2 HFTD areas, 14,978 in Tier 3 HFTD areas.

C. (3.9) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

There have been no changes to the 1-year and 5-year targets since the last SOMs filing.

2. Target Methodology

To establish the 1-Year and 5-Year targets, PG&E considered the following factors:

- Historical Data and Trends: The July 31 deadline for HFTD patrols was first applied in 2021 and is still in practice. Therefore, targets use 2021 performance as a baseline with incremental improvement for the reasons described below;
- Benchmarking: Not available;
- Regulatory Requirements: Relevant items include: (1) General Order 165 requirements to follow internal maintenance procedures, and (2) Wildfire Mitigation Plan targets to perform HFTD inspections and patrols by July 31;
- Attainable Within known Resources/Work Plan: Targets are attainable within currently known resources;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: Targets are suitable indicators for Enhanced Oversight and Enforcement as historical driver of worsening performance (asset registry changes after July 31) will have an allowance to be counted as on time if inspected within 90 days of the addition to the registry or HFTD change at the beginning of 2022. This update ensures that the metric is an appropriate indicator of performance by focusing the measure on timely action to complete inspections as opposed to asset registry completeness; and
- Other Qualitative Considerations: None.

3. 2025 Target

The 2025 target is to maintain performance to 0.00-0.03 percent, based on the 90-day allowance for asset registry changes and consideration of double circuits described in the methodology above.

4. 2029 Target

The 2029 target is to maintain performance to 0.00-0.02 percent, based on the 90-day allowance for asset registry changes and consideration of double circuits described in the methodology above, as well as a reduction over time in the number of asset registry additions from assets being discovered in the field.

D. (3.9) Performance Against Target

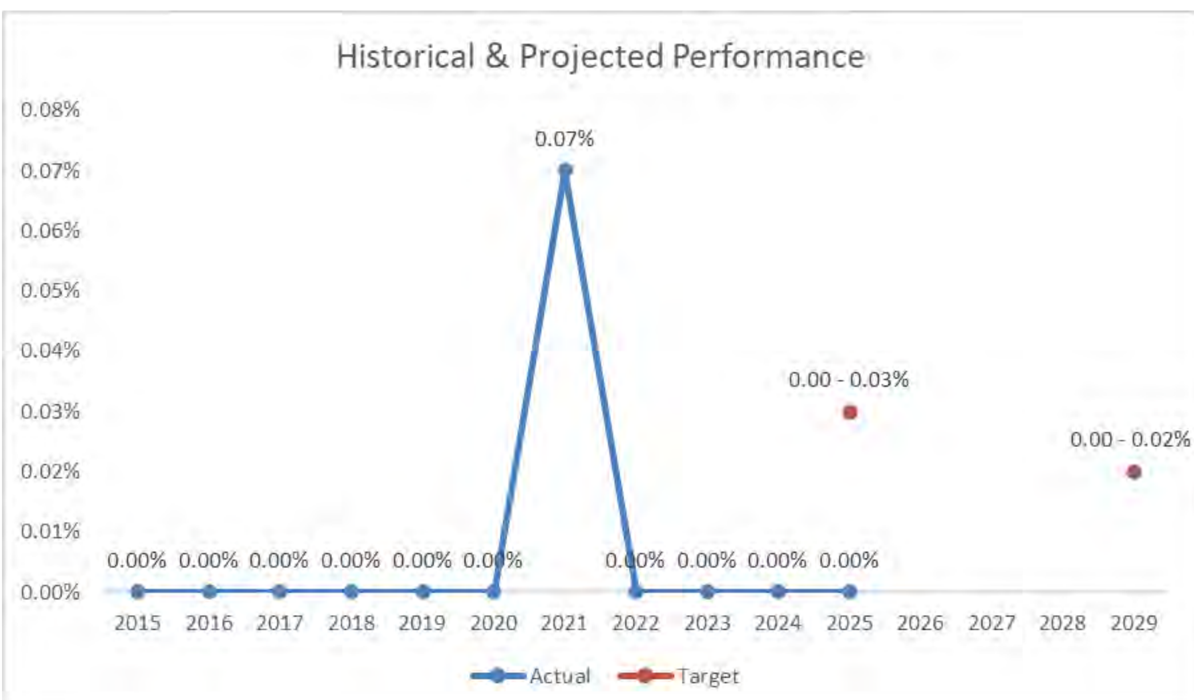
1. Maintaining Performance Against the 1-Year Target

As demonstrated in Figure 3.9-2 below, PG&E observed a 0.00 percent missed overhead Transmission patrols in 2025 (Jan-June) which is consistent with company's 1-year target.

2. Maintaining Performance Against the 5-Year Target

As discussed in Section E below, PG&E is deploying a number of programs to maintain or improve long-term performance of this metric to meet the Company's 5-year performance target.

FIGURE 3.9-2
HISTORICAL PERFORMANCE (2015-JUNE 2025) AND TARGET (2025 AND 2029)



E. (3.9) Current and Planned Work Activities

Below is a summary description of the key activities that are tied to performance:

- 2025 Inspection and Patrol Plan: The 2025 Inspection and Patrol plan has been created, which defines the initial scope of the HFTD patrols that fall under this metric. The plan contains approximately 220 circuits running through HFTD areas (containing approximately 47,000 HFTD structures) that will be patrolled.
- Monthly Inspection Validations: Monthly inspection validations, which also consider required patrols, will continue to identify required additions to the original plan arising from additions or changes to the asset registry. Changes in HFTD affect the scope of patrols covered by this metric.
- In-Year Deadline Requirements: The in-year deadline of July 31 introduced in 2021 for patrols in HFTD will continue to be used in 2025, with the same provisions for access issues as in 2021 and the addition of the 90-day requirement described above for additions and changes to the asset registry. The deadline is tracked with the patrol orders so that each HFTD patrol is identified as having the July 31 compliance requirement.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.10

MISSED OVERHEAD TRANSMISSION DETAILED INSPECTIONS

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The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.10) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 3.10 – Missed Overhead Transmission Detailed Inspections in HFTD Areas is defined as:

Overhead (OH) Transmission Detailed Inspections in High Fire Threat District (HFTD): Total number of structures that fell below the minimum inspection frequency requirements divided by the total number of structures that required inspection, in HFTD area in past calendar year where, "Minimum inspection frequency" refers to the frequency of scheduled inspections requirements, as applicable. "Structures" refers to electric assets such as transformers, switching protective devices, capacitors, lines, poles, etc.

2. Introduction of Metric

Detailed inspections are performed using several methods (ground, aerial, and climbing) to identify non-conformances affecting safety or reliability. Within HFTD areas, non-conformances identified by inspections can involve conditions that represent a wildfire ignition risk. Performing inspections on time allows non-conformances to be identified in a timely manner so that they can be prioritized for repair in accordance with the risk of the condition.

Due to the importance of detailed inspections in identifying conditions that affect wildfire, other safety, and reliability risks, the OH transmission detailed inspection program has undergone significant evolution over the reporting period for the metric, 2015-present. Prior to 2019, detailed ground inspections were performed by circuit with a frequency depending on the voltage and whether the majority of the structures on the circuit were wood (2-year cycle) or steel (5-year cycle).

The Wildfire Safety Inspection Program (WSIP), which began in late 2018 and extended into 2019, introduced several key improvements to OH transmission inspections including the use of an 'enhanced' inspection methodology with a questionnaire developed from a wildfire-ignition Failure Modes and Effects Analysis and the addition of aerial inspections using high-resolution drone photographs to provide a second vantage point from above to complement the ground inspections performed with the inspector standing at the base of the structure. These improvements from WSIP were incorporated into the regular OH inspection program beginning in 2020.

The 2020 inspections replaced the old wood- or steel-based inspection cycles with cycles that called for more frequent inspections in HFTD areas, annually for Tier 3 and on a 3-year cycle for Tier 2, compared to a 5-year cycle for non-HFTD areas. The 2020 inspections also included non-HFTD structures in High Fire Risk Areas (HFRA), which were treated like Tier 2.

The 2021 inspection program continued using the HFTD-based cycles introduced in 2020 and imposed an in-year deadline for HFTD and HFRA inspections of July 31, consistent with Pacific Gas and Electric Company's (PG&E or the Company) 2021 Wildfire Mitigation Plan (WMP). The intent of this deadline was to allow completion of the inspections and any emergency repairs found from the inspections prior to peak fire season. Monthly validations of the inspection plan were started in June 2021, moving to quarterly in 2026, to ensure that all assets requiring an inspection under their prescribed cycles were included in the plan, including assets that were newly added to the asset registry.

The 2022 inspection scope introduced the use of wildfire risk and consequence scores at the structure level to inform the selection of assets to be inspected. Inspection method and frequency is determined by wildfire risk and structure type. At the beginning of 2022, assets were added to the registry after July 31 or whose HFTD changes after July 31 will not be considered late, provided that they are inspected within 90 days of the addition to the registry or the HFTD change.

3. Audit Results

In the Audit Report, Metric 3.10 received a Metric Accuracy Finding of "Minor."[1] The finding for this metric was based on minor data inaccuracies that include, The 2023 full-year dataset incorrectly included inspections in HFRA and Zone 1, In 2021, FEP found 40 late inspections, while PG&E reported 36 and Assets often have multiple inspections (e.g., ground, drone, climbing), but the metric should count only one required inspection per asset.[2] The findings have been resolved. The corrections implemented include: HFTD classification inconsistency; missing inspection records; incomplete inspection history; and multiple inspection types inflating the denominator. These corrections and updates are reflected in this report filing.

B. (3.10) Metric Performance

1. Historical Data (2015 – June 2025)

Historical data is provided from 2015 – June 2025. Data provided for 2015-2019 reflects systemwide performance. HFTD-specific performance is not available prior to 2020. The percentage of missed inspections is calculated as the number of inspections not performed by the required deadline divided by the total number of inspections performed for that year. Through 2020, there was not a specific in-year deadline for inspections, so the deadline was considered December 31. The July 31 deadline for HFTD inspections in 2021 allowed exceptions due to access issues, landowner refusal, or site-specific worker safety situations (i.e., Cannot Get In (CGI)) where an unsuccessful inspection attempt was made prior to the deadline. In 2021, HFTD structures added to the asset registry after July 31 and inspected after the July 31 deadline were counted as missed inspections, as well as instances where the asset location was corrected from non-HFTD to HFTD after July 31.

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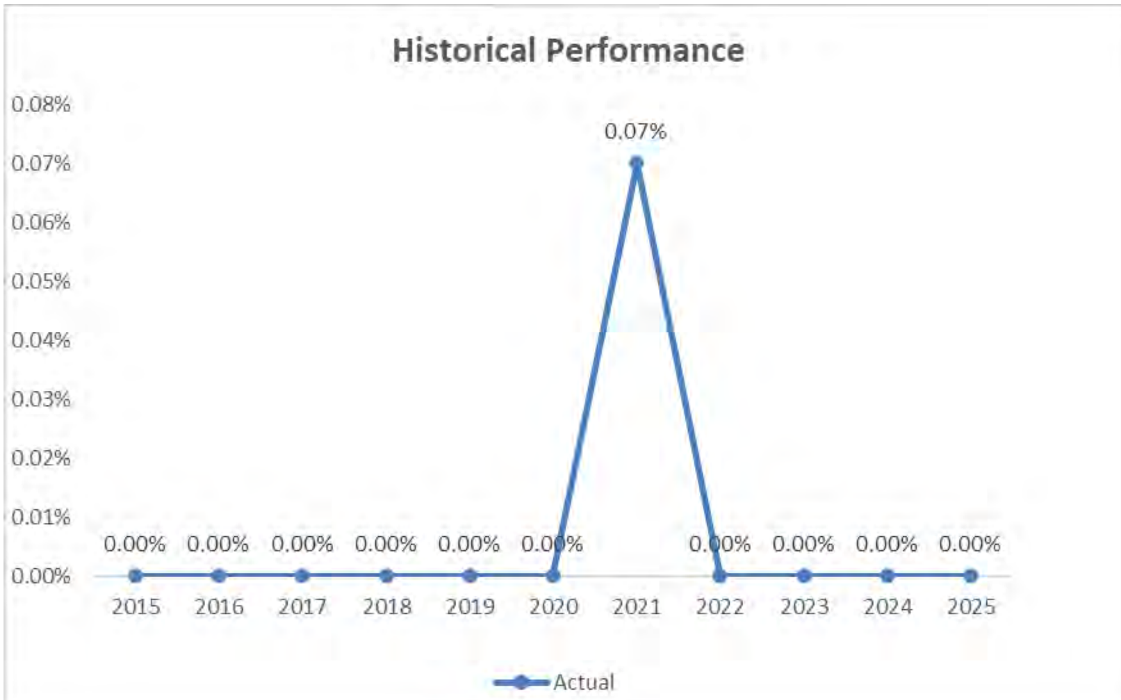
[1] Audit Report, p. 8, Table 1-1.

[2] Audit Report, p. 140-142.

FIGURE 3.10-1
HISTORICAL PERFORMANCE PERCENT LATE
(2015-JUNE 2025)



2. Data Collection Methodology

The currently used data collection methodology was implemented in 2020. It uses a mobile platform for completing overhead inspections, recorded at structure (pole) level using a detailed inspection checklist.

3. Metric Performance for the Reporting Period

In 2025, there were no missed inspections resulting in a 0.00 percent missed overhead Transmission detailed inspections with a total of 37,053 inspections completed—29,802 in Tier 2 HFTD areas, 7,251 in Tier 3 HFTD areas.

C. (3.10) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

There have been no changes to the 1-year and 5-year targets since the last SOMS filing.

2. Target Methodology

To establish the 1-Year and 5-Year targets, PG&E considered the following factors:

- Historical Data and Trends: The July 31 deadline for HFTD inspections was first applied in 2021 and is still in practice. Therefore, targets use 2021 performance as a baseline with incremental improvement for the reasons described below;
- Benchmarking: Not available;
- Regulatory Requirements: Relevant items include: (1) General Order 165 requirements to follow internal maintenance procedures, and (2) WMP targets to perform certain HFTD inspections and patrols by July 31;
- Attainable Within Known Resources/Work Plan: Targets are attainable within currently known resources;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: Targets are suitable indicators for Enhanced Oversight and Enforcement as historical driver of worsening performance (asset registry changes after July 31) will have an allowance to be counted as on time for any assets discovered after January 1 of the given year and due for a baseline frequency inspection based on installation date (via the created date in SAP), will be inspected within 90 days of when added to the asset registry or by July 31 or the given year, whichever is later. Structures in scope for the given year with HFTD tier changes from Non-HFTD to HFTD after January 1st are also given an allowance for inspection within 90 days of the change or July 31, whichever is later. This update beginning in 2022 ensures that the metric is an appropriate indicator of performance by focusing the measure on timely action to complete inspections as opposed to asset registry completeness.
- Other Qualitative Considerations: None.

3. 2025 Target

The 2025 target is to maintain performance to 0.00-0.03 percent, based on the 90-day allowance for asset registry changes described in the methodology above.

4. 2029 Target

The 2029 target is to maintain performance to 0.00-0.02 percent, based on the 90-day allowance for asset registry changes described in the methodology above, as well as a reduction over time in the number of asset registry additions from assets being discovered in the field.

D. (3.10) Performance Against Target

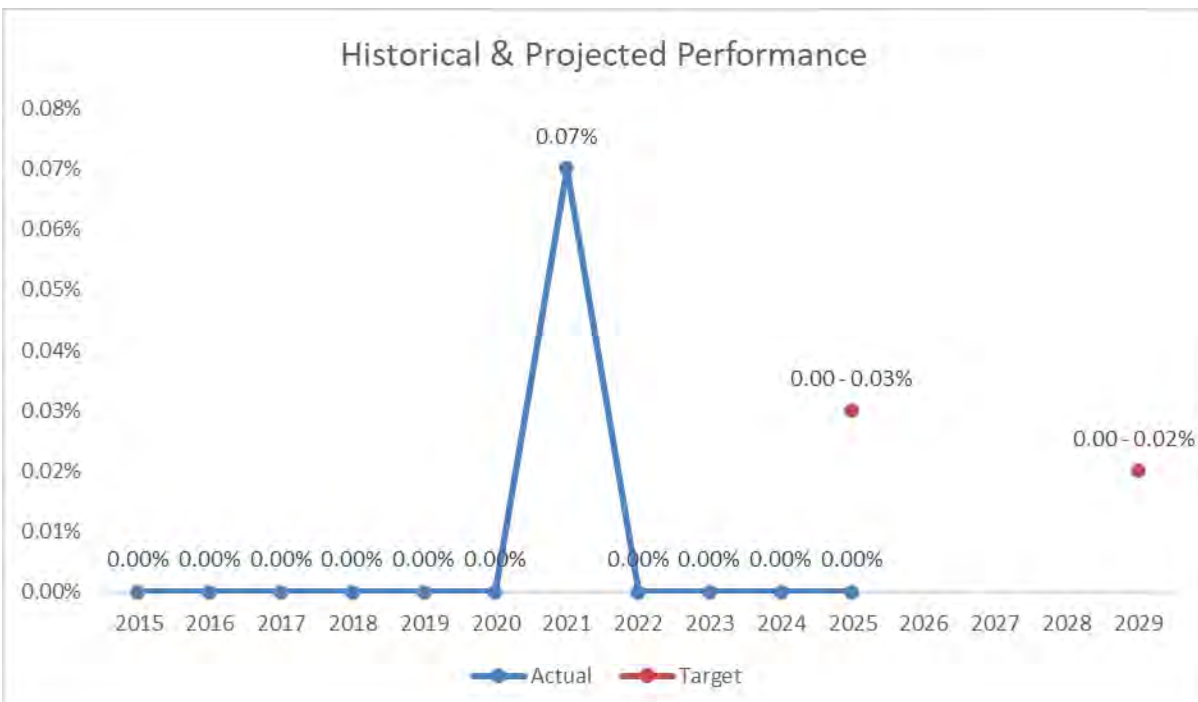
1. Progress Towards the 1-Year Target

As demonstrated in Figure 3.10-2 below, PG&E observed a 0.00 percent missed overhead Transmission detailed inspections in 2025 (Jan-June) which is consistent with Company's 1-year target.

2. Progress Towards the 5-Year Target

As discussed in Section E below, PG&E has deployed a number of programs to maintain or improve long-term performance of this metric to meet the Company's 5-year performance target.

FIGURE 3.10-2
HISTORICAL PERFORMANCE (2015-JUNE 2025)
AND TARGETS (2025 AND 2029)



E. (3.10) Current and Planned Work Activities

Below is a summary description of the key activities that are tied to performance.

- <u>2025 Inspection and Patrol Plan</u>: The 2025 inspection plan has been created and contains Tier 3 and Tier 2 structures totaling approximately 21,000 receiving ground inspection, 20,000 aerial inspections, and approximately 1,100 structures that also will receive a climbing inspection.
- <u>Monthly Inspection Validations</u>: Monthly inspection validations will continue to identify required additions to the original plan arising from additions or changes to the asset registry. Changes in HFTD may affect the scope of inspections covered by this metric.
- <u>In-Year Deadline Requirements</u>: The in-year deadline of July 31 introduced in 2021 for inspections in HFTD will continue to be used in 2025, with the same provisions for CGI access issues as in 2021 and the addition of the 90-day requirement described above for additions and changes to the asset registry. The deadline is tracked with the inspection and patrol orders so that each HFTD inspection is identified as having the July 31 compliance requirement.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.11

GO 95 CORRECTIVE ACTIONS IN HFTDS

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The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.11) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 3.11 – General Order (GO) 95 Corrective Actions in High Fire Threat Districts (HFTD) is defined as:

The number of Priority Level 2 notifications that were completed on time divided by the total number of Priority Level 2 notifications that were due in the calendar year in HFTDs. Consistent with General Order (GO) 95 Rule 18 provisions, the proposed metric should exclude notifications that qualify for extensions under reasonable circumstances.[1]

GO 95, Rule 18, Priority Level 2 has four relevant timeframes for corrective action, of which 2 are relevant for HFTD criteria used in SOMs: (1) six months for potential violations that create a fire risk in Tier 3 of HFTD; (2) 12 months for potential violations that create a fire risk in Tier 2 of HFTD.[2]

This metric is also reported as Metric 29 in the annual Safety Performance Metrics Report.

2. Introduction to the Metric

The GO 95 Corrective Actions in HFTD metric measures the number of Priority Level 2 electric corrective notifications (tags) in HFTD that are completed in accordance with the GO 95 Rule 18 timelines. This metric is associated with our Failure of Electric Distribution Overhead Asset Risk and our Wildfire Risk, which are part of our 2024 Risk Assessment and

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[1] Correction times may be extended under reasonable circumstances, such as: third-party refusal, customer issue, no access, permits required, system emergencies (e.g., fires, severe weather conditions).

[2] GO 95 Rule 18, B1ai-aiii.

Mitigation Phase Report filing. Priority notifications are tracked to completion against procedural timelines that are consistent with the underlying risk of the work. Vegetation Management (VM) work generally follows wildfire risk priorities.

3. Background

This metric consists of two major activities: corrective notification repairs and VM. The section below describes the work, including risk-informed prioritization and associated activities. We also compare Pacific Gas and Electric Company's (PG&E or the Company) priority classifications against GO 95 Rule 18's classification and timelines for completion.

- Corrective Notifications: PG&E identifies compelling abnormal conditions on overhead electric equipment through routine inspection and patrol programs we well as through other means such as in the course of performing work. Regular inspections of our overhead and underground electric assets are designed to meet GO 165 requirements. When an inspector identifies an abnormal compelling condition, the inspector may immediately correct the condition by performing minor work or recording the uncorrected condition, which is then reviewed by a centralized inspection review team (CIRT). CIRT reviews proposed findings for consistency with the latest guidelines and creates EC and LC notifications as needed. This additional review performed by the CIRT is to drive consistency in inspection results by having a centralized team review all field findings prior to recording the finding as a tag.

  Tags are prioritized based on the risk posed by the condition and urgency of repairs. We have subdivided Priority Level 2 notifications into three categories based on their due date: Priority "X", Priority "B" and Priority "E". Priority "B" notifications are scheduled to be addressed within 6 months. The due date for Priority E is within 6 months for Tier 3 and 12 months for Tier 2.
- VM: We routinely inspect clearances between our overhead electric assets and adjacent vegetation through a variety of methods, including observations during recurring patrols and targeted program inspections.

These inspections are conducted by VM personnel and/or contractors and are designed to identify if tree work is required to meet or, in some cases, exceed GO 95 Rule 35 requirements and fire safety regulations that require a minimum clearance of 4 feet year-round for high-voltage power lines in the California Public Utilities Commission-designated HFTD areas. GO 95 Rule 35 also requires the removal of dead, diseased, defective, and dying trees that could fall into the lines.

When an inspector identifies a clearance condition or a potential tree hazard, they record an abatement prescription (tree work) within VM's data systems. This tree work is assigned to tree crews and completed in alignment with the timeframes defined in VM standards and procedures, unless there are constraints that require prior resolution before inspection or tree work proceeds (e.g., customer access, city or agency permits, environmental considerations). Unless constrained, tree work completion timing is based on HFTD Tier from the date it was inspected, which is either 180 days for Tier 3 or 365 days for Tier 2. Tree crews document the completion of tree work within VM data systems. VM tree work identified in this way does not follow the Electric Corrective notifications (EC for Distribution) and Line Corrective notifications (LC for Transmission) priority assignments. Our VM timeline to complete this tree work generally aligns with the risk presented by the vegetation and the risk reduction objectives of the VM Program. It is important to note that this data is classified into two categories: (1) Vegetation Dead and Dying and (2) Vegetation Priority 2, where each record reflects work completed on a tree.

- Priority Classifications and Timelines for Completion: We manage our corrective actions in HFTDs with a risk-informed prioritization of our work plans. Our strategy focuses on reducing wildfire risk associated with open corrective notifications. To accomplish this, we address the highest risk Level 2 corrective notifications first. After that, we manage the inventory of Level 2 Priority "E" corrective notifications in a risk-informed manner, where the highest risk Level 2 Priority "E" corrective notifications, within the same clearance point, are targeted first, while deploying safety controls to manage the lower risk Level 2

Priority “E” corrective notifications. This approach allows strategic and targeted wildfire risk reductions, informed by customer impact and risk spend efficiencies, to continue to be our primary focus.

We recognize that our electric Priority “X” and Priority “B” notifications have internal timelines that are more aggressive than GO 95 Rule 18 Priority Level 2. However, consistent with the safety and operational metric definitions provided in Decision 21-11-009, we are reporting our performance against the timelines set forth in GO 95 Rule 18. Furthermore, we are including all EC and LC notifications, as well as all inspection-identified vegetation safety hazards that meet the definition of GO 95 Rule 18 Level 2.

At the end of 2022, Priority “B” was eliminated for newly created transmission (LC) notifications so that priority “E” LC notifications now directly align to Rule 18 Level 2. Priority “E” notifications may have timelines shorter than the maximum allowable Level 2 timelines, so 3-month notifications still can be created as priority “E.” The existing population of “B” priority notifications was closed in 2023.

The following table summarizes the priority classifications we use to comply with GO 95 Rule 18. Transmission’s priority levels have changed to remove priority “B,” allow reduced durations under priority “E,” and increase the duration for priority “F” to align with the Level 3 duration in GO 95 Rule 18.

TABLE 3.11-1
GO 95 RULE 18 RISK CATEGORIES AND TIMELINES

Line No.	GO 95 Rule 18	PG&E Priority	Description	GO 95 Rule 18 Timeline for Corrective Action	PG&E Internal Timeline for Corrective Action (Electric Notifications)	PG&E Internal Timeline for Corrective Action (Vegetation Tree Work)
1	Level 1	A (Electric) Priority 1 (Vegetation)	An immediate risk of high potential impact to safety or reliability	Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority	Consistent with GO 95 Rule 18	Within 24 hrs. after identification
2	Level 2	X (Electric Dx)	High potential impact to safety or reliability but do not pose an immediate risk.	Time period for corrective action to be determined at the time of identification by a qualified Company representative, but not to exceed: 1. Six months for potential violations that create a fire risk located in Tier 3 of the HFTD. 2. 12 months for potential violations that create a fire risk located in Tier 2 of the HFTD. 3. 12 months for potential violations that compromise worker safety; and 4. 36 months for all other Level 2 potential violations.	Corrective action within 7 days from date condition identified for electric equipment	N/A
		B (Electric Dx) Priority 2 or Dead & Dying (Vegetation)	Any other risk of at least moderate potential impact to safety or reliability: Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority).	Same as above	Corrective action within 6 months from date condition identified for electric equipment	1. Within 20 business days from identification Priority 2 Tag.(excluding work that is constrained) 2. Dead & Dying tree(excluding work that is constrained): a. Six months within Tier 3 & Tier 2 of the HFTD; and b. 12 months outside Tier 3 & Tier 2 of the HFTD.
3		E (Electric)	Any other risk of at least moderate potential impact to safety or reliability: Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority).	Same as above	Corrective action within: Six months for conditions that create a fire risk located in HFTD Tier 3 12 months for conditions that create a fire risk located in HFTD Tier 2 12 months for potential violations that compromise worker safety; and 36 months for all other Level 2 potential violations. Transmission: Corrective action timelines can be reduced below the maximum values listed above.	N/A

TABLE 3.11-1
GO 95 RULE 18 RISK CATEGORIES AND TIMELINES
(CONTINUED)

Line No.	GO 95 Rule 18	PG&E Priority	Description	GO 95 Rule 18 Timeline for Corrective Action	PG&E Internal Timeline for Corrective Action (Electric Notifications)	PG&E Internal Timeline for Corrective Action (Vegetation Tree Work)
4		H (Electric Dx)	These are PG&E Priority “E” Notifications that are planned to be addressed by a planned System Hardening Project	Same as above	Same as above-	N/A
5	Level 3	F (Electric)	Any risk of low potential impact to safety or reliability	Take corrective action within 60 months subject to the specific exceptions.[a]	Corrective actions to be addressed within five years from date condition is identified.	N/A

(a) EXCEPTION – Potential violations specified in Appendix J or subsequently approved through Commission processes, including, but not limited to, a Tier 2 Advice Letter under GO 96B, that can be completed at a future time as opportunity-based maintenance. Where an exception has been granted, repair of a potential violation must be completed the next time the Company’s crew is at the structure to perform tasks at the same or higher work level (i.e., the public, communications, or electric level). The condition’s record in the auditable maintenance program must indicate the relevant exception and the date of the corrective action.

4. Audit Results

In the Audit Report, Metric 3.11 received a Metric Accuracy Finding of “Significant (2021 only).”[3] This finding was due to erroneous calculations from Vegetation Management, Transmission, and Distribution.[4] The findings are partially resolved.

The erroneous calculations for 2021 have been corrected. In this report PG&E has reported the corrected 2021 calculations for Transmission, Vegetation Management, and Distribution in the 2021 metric values.

As part of the audit, PG&E has identified a population of EC notifications with erroneous compliance due dates and is investigating underlying causes and establishing corrective actions. The corrective actions for Distribution will be tracked by Corrective Action Plan with an anticipated resolution date of December 31, 2025.

3 Audit Report, p. 8, Table 1-1.

4 Audit Report, p. 146-147.

B. (3.11) Metric Performance

1. Historical Data (2020 – June 2025)

We are reporting historical data from the years 2020 through 2025 (Jan-June). The historic data for 2021 has been corrected as stated in Section A.4 above.

Our history of available data, which is recorded in our electric work management systems (e.g., SAP) goes back to 2010. However, we are focusing our historical reporting for this metric starting at 2020 due to various changes that occurred prior to 2020, which reshaped GO 95 and GO 165 to include boundaries for HFTD, as well as informed our current inspection methods to be more enhanced towards identifying ignition risks.

Reported timelines generally align with VM adoption of updated internal timeliness for Priority Tag mitigation and additional 'Dead & Dying' tree abatement identified through the implementation of PG&E Enhanced VM (EVM) Program in 2019. The VM Program's work management systems track tree prescriptions and completion of trim/removal through separate databases; the Vegetation Management Database (VMD) and OneVM.

2. Data Collection Methodology

Data collected prior to year 2020 is excluded due to the various GO 165 and GO 95 Rule 18 changes mentioned above.

We are including all EC (Distribution) and LC (Transmission) notifications, as well as all inspection-identified vegetation safety hazards that meet the definition of GO 95 Rule 18 Level 2. Note that due dates must be manually adjusted in our data to align with the GO 95 Rule 18 timelines which vary from our internal timelines as previously mentioned.

3. Metric Performance for the Reporting Period

Metric performance is comprised of an aggregated performance for electric distribution and electric transmission (ET) corrective notifications, as well as vegetation safety hazards.

As described in earlier sections, we are reporting and setting targets against the timeframes identified in GO 95 Rule 18 rather than the timelines articulated in our internal electric Priority "X", Priority "B" and "E" notifications, and internal VM Priority 2 and Dead and Dying Tree abatement corrective notifications.

To address the unprecedented wildfire risk in our service territory, in 2019 we launched our Wildfire Safety Inspection Program (WSIP) as part of our Wildfire Safety Plan. The intent of that program was to expand our focus during inspections to include fire ignition risk posed by failure modes on our electric assets and accelerate the inspections to be complete by the beginning of the 2019 wildfire season. The WSIP generated a volume much greater than what we have typically experienced for our annual electric corrective notification volume, with the majority of electric corrective notifications being of lower risk (e.g., Level 2 Priority “E” & Level 3).

Given the high volume (e.g., approximately 4x the volume from prior years) of identified electric distribution and transmission corrective notifications in the 2019 WSIP, we pivoted from managing our electric corrective notifications based on due date to focusing our priority through a wildfire risk informed approach. This means we would complete Level 1 and Level 2 Priority “X” and Priority “B” corrective notifications based on their GO 95 Rule 18 deadlines and internal standards and manage the maintenance log of Level 2 Priority “E” and Level 3 corrective notifications in a risk-prioritized manner.

As described in the 2026-2028 WMP, we are continuing to work down the distribution EC notification maintenance log based on risk prioritization, and we have accelerated the work in the HFTD by bundling and working notifications by isolation zone. Bundling by isolation zone provides us the flexibility to address the most risk first through a risk spend efficiency (RSE) approach and is providing significant savings in execution efficiency. Bundling also reduces the number of customer outages required and improves customer satisfaction. Through bundling and other improvements, our plan is to be in compliance, with no overdue distribution EC notifications in the HFTD, by the end of 2029. While PG&E’s maintenance tag plan will result in some lower-risk maintenance tags exceeding the current GO 95, Rule 18 timelines, the plan is prudent because it will allow PG&E to reduce the maintenance log more quickly and execute more tags with the same amount of resources while reducing the amount of clearances needed per unit executed.

We are also currently completing available vegetation priority corrective notifications within our internal timelines, excluding corrective notifications where we are constrained due to external factors, such as customer interferences or permitting. Trees are worked as dependencies and constraints are resolved. This is consistent with our Dead and Dying Tree Abatements.

The following figure plots our historical performance for GO 95 Rule 18 Level 2 HFTD Corrective Notifications.

FIGURE 3.11-1
GO 95 CORRECTIVE ACTIONS IN HFTDS – HISTORICAL PERFORMANCE (2020 – JUNE 2025)

Note: Historical performance for 2021 was changed since the last report from 64.8 percent to 64.2 percent per the findings of the SOM 2024 audit. This change does not affect whether PG&E met the target for that year because there was no metric target for 2021, SOM's reporting started in 2022. The data errors have been resolved for Transmission and Vegetation Management. For Distribution, the issue is in progress of being addressed. PG&E has identified a population of notifications with erroneous compliance due dates and is conducting a root cause analysis.

TABLE 3.11-2
GO 95 RULE 18 PRIORITY LEVEL 2 ACTUAL 2025 YTD
CORRECTIVE ACTIONS PERFORMANCE
(ELECTRIC DISTRIBUTION, ET AND VM)

Line No.	Year 2025	Level 2 Results
1	On Time	89,576
2	Past Due	19,330
3	Percent On Time	82.3%

TABLE 3.11-3
GO 95 RULE 18 LEVEL 2 ACTUAL 2025 YTD
CORRECTIVE ACTIONS PERFORMANCE
(ELECTRIC DISTRIBUTION ONLY)

Line No.	Year 2025	Level 2 Priority "E"	Level 2 Priority "B"	Level 2 Priority "B" From "E"	Level 2 Priority "X"	Level 2 Results
1	On Time	1,196	2,587	53	753	4,589
2	Past Due	18,006	236	24	1	18,267
3	Percent On Time	6.2%	91.6%	68.8%	99.9%	20.1%

TABLE 3.11-4
GO 95 RULE 18 LEVEL 2 ACTUAL 2025 YTD
CORRECTIVE ACTIONS PERFORMANCE
(ET ONLY)

Line No.	Year 2025	Level 2 Results
1	On Time	5,578
2	Past Due	916
3	Percent On Time	85.9%

Note: Per PG&E Utility Procedure TD-8123P-103,effective 1/03/2023, all Level 2 Transmission tags are considered priority "E" which aligns with GO 95, Rule 18 Levels 1, 2, and 3. Tag priority categorization will no longer be provided for Transmission tags.

TABLE 3.11-5
GO 95 RULE 18 LEVEL 2 ACTUAL 2025 YTD
CORRECTIVE ACTIONS PERFORMANCE
(VM)

Line No.	Year 2025	EVM Dead and Dying	Vegetation Dead and Dying	Vegetation Priority 2	Level 2 Results
1	On Time	445	45,330	33,634	79,409
2	Past Due	16	113	18	147
3	Percent On Time	96.5%	99.8%	99.9%	99.8%

C. (3.11) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

The 1-year and 5-year targets have not changed since the last SOMs filing.

2. Target Methodology

To establish the 1-Year and 5-Year targets, we considered the following factors:

- Historical Data and Trends: The targets are based on the projected volume of GO 95 Rule 18 Priority Level 2 notifications, which consider existing open tags and forecasted new tags that are due for each year;
- Benchmarking: Not available;
- Regulatory Requirements: GO 95 Rule 18 requirements;
- Attainable Within Known Resources/Work Plan: Attainability is subject to other emerging higher risk priorities that may influence our ability to meet projected targets. If emerging higher risk priorities emerge throughout the course of the year, we may need to prioritize our available resources to address these higher risk priorities and adjust our work plan accordingly;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: Yes, performance at projected levels is sustainable, subject to other emerging higher risk priorities may influence ability to meet projected targets. If emerging higher risk priorities emerge throughout the course of the year, we may need to prioritize our available resources to address these higher risk priorities and adjust our work plan accordingly; and

- Other Qualitative Considerations: This target was established with the consideration of our risk informed strategy, as opposed to a corrective notification due date prioritization approach.

3. 2025 Target

Our target for Priority Level 2 corrective maintenance notifications on time completion rates is 73.8 percent for the year 2025. This metric performance is comprised of an aggregated score combining performance of electric distribution, ET and VM.

For year 2025, electric distribution notifications completed on time percentage is projected at approximately 17 percent and ET notifications completed on time percentage is projected at approximately 70 percent. The projected forecast for VM is approximately 98 percent.

Our distribution corrective notifications strategy will continue to focus on reducing wildfire risk associated with our open corrective notifications by working the highest risk spend efficiency bundles for Level 2 corrective notifications first versus managing corrective notification due dates. Using this approach in 2023 through 2025, we reduced the relative wildfire risk associated with backlog[5] open electric distribution corrective maintenance notifications in HFTD Tiers 2 and 3 by as much as 73.4 percent.

Transmission Line expects to have an improved on-time performance on Level 2 notifications within 2025. In 2024, Transmission line had conflicting priorities with the remaining open WMP backlog. This conflict does not exist in 2025, and Transmission can focus primarily on completing Level 2 notifications prior to the GO 95 due date. Additionally, Transmission Line has created a formal GO 95 rule 18 extension process for documenting due date extensions based on reasonable circumstances, that will improve our on-time performance.

For Vegetation Management, our forecast has been adjusted to account for the expected find rate of trees requiring work, and to reflect the volume of trees that may be constrained due to external factors. The focus of

[5] Backlog tags are open ignition EC notifications known as of January 5, 2023, and found prior to Jan 1, 2023, in HFTD/HFRA locations.

Vegetation Management will continue to be placed on execution of the wildfire mitigation programs described in the 2023-2025 WMP.

The following tables summarize PG&E's Year 2025 Target for Priority Level 2 notifications completed on time percentage, as well as a breakdown between the electric distribution, ET and VM Priority Level 2 notifications performance. Since the "B" priority will no longer be assigned to transmission notifications, as described above, transmission projections are not separated by "B" and "E" priority levels. Table 3.11-6 has been updated only to reflect Level 2 results due to the priority level changes in transmission.

TABLE 3.11-6
GO 95 RULE 18 PRIORITY LEVEL 2 PROJECTED 2025 CORRECTIVE ACTIONS PERFORMANCE (ELECTRIC DISTRIBUTION, ET AND VM)

Line No.	Year 2025	Level 2 Results
1	On Time	162,294
2	Past Due	57,476
3	Percent On Time	73.8%

TABLE 3.11-7
GO 95 RULE 18 LEVEL 2 PROJECTED 2025 CORRECTIVE ACTIONS PERFORMANCE (ELECTRIC DISTRIBUTION ONLY)

Line No.	Year 2025	Level 2 Priority "E"	Level 2 Priority "B"	Level 2 Priority "B" From "E"	Level 2 Results
1	On Time	5,130	5,204	233	10,567
2	Past Due	46,169	3,286	2,150	51,605
3	Percent On Time	10%	61%	10%	17%

TABLE 3.11-8
GO 95 RULE 18 LEVEL 2 PROJECTED 2025
CORRECTIVE ACTIONS PERFORMANCE
(ET ONLY)

Line No.	Year 2025	Level 2 Results
1	On Time	6,820
2	Past Due	2,913
3	Percent On Time	70%

TABLE 3.11-9
GO 95 RULE 18 LEVEL 2 PROJECTED 2025
CORRECTIVE ACTIONS PERFORMANCE
(VM)

Line No.	Year 2025	Vegetation Dead and Dying	Vegetation Priority 2	EVM Dead and Dying	Level 2 Results
1	On Time	81,202	62,889	816	144,908
2	Past Due	1,657	1,283	17	2,957
3	Percent On Time	98%	98%	98%	98%

4. 2029 Target

Our 5-year target for Priority Level 2 corrective maintenance notifications on time is 86.1 percent. This target is a 17 percent increase from the 2025 target of 73.8 percent based on our GM-03 commitment to return to compliance in HFTD/HFRA by the end of 2029.

This metric performance is comprised of an aggregated performance where the projected year 2029 volume of on time corrective notifications for electric distribution, ET and vegetation are at 64,677; 8,500; and 144,865, respectively.

For year 2029, we are projecting an on-time percentage of approximately 57 percent, 95 percent, 98 percent for electric distribution, ET, and vegetation notifications performance, respectively.

Our distribution corrective notifications strategy will continue to focus on reducing the most wildfire risk associated with our open corrective notifications per dollar spent by working the highest risk bundles by isolation zone first versus managing corrective notification due dates.

The following tables summarize our Year 2029 Target for Priority Level 2 notifications completed on time percentages, as well as a breakdown between the electric distribution, ET and vegetation Priority Level 2 notifications completed on time percentages.

TABLE 3.11-10
GO 95 RULE 18 PRIORITY LEVEL 2 PROJECTED 2029 CORRECTIVE ACTIONS PERFORMANCE (ELECTRIC DISTRIBUTION, ET AND VM)

Line No.	Year 2029	Level 2 Results
1	On Time	192,934
2	Past Due	31,244
3	Percent On Time	86.1%

TABLE 3.11-11
GO 95 RULE 18 LEVEL 2 PROJECTED 2029 CORRECTIVE ACTIONS PERFORMANCE (ELECTRIC DISTRIBUTION ONLY)

Line No.	Year 2029	Level 2 Priority “E”	Level 2 Priority “B”	Level 2 Priority “B” From “E”	Level 2 Results
1	On Time	27595	7039	1976	36609
2	Past Due	27594	370	104	28069
3	Percent On Time	50%	95%	95%	57%

TABLE 3.11-12
GO 95 RULE 18 LEVEL 2 PROJECTED 2029 CORRECTIVE ACTIONS PERFORMANCE (ET ONLY)

Line No.	Year 2029	Level 2 Results
1	On Time	8,075
2	Past Due	425
3	Percent On Time	95%

TABLE 3.11-13
GO 95 RULE 18 LEVEL 2 PROJECTED 2029 CORRECTIVE ACTIONS PERFORMANCE (VM)

Line No.	Year 2029	Vegetation Dead and Dying	Vegetation Priority 2	Level 2 Results
1	On Time	121520	26730	148250
2	Past Due	2480	270	2750
3	Percent On Time	98%	99%	98%

The Figure 3.11-2 plots our aggregated historical and aggregated projected performance for GO 95 Rule 18 Level 2 HFTD Corrective Notifications.

D. (3.11) Performance Against Target

1. Progress Towards 1-Year Target

PG&E is on track to exceed the 2025 target of 73.8 percent. As of June 2025, consolidated metric performance is 82.3 percent, with Distribution, Transmission, and Vegetation Management all exceeding their 2025 target performance.

Vegetation Management is completing Level 2 work 99.8 percent on time. This is driven by an improvement in the timeliness of Dead & Dying to 99.7 percent YTD 2025, from 99.1 percent in 2024. Vegetation Management continues to focus on customer engagement, around the risk-mitigation benefits of this work, to improve constraint resolution outcomes.

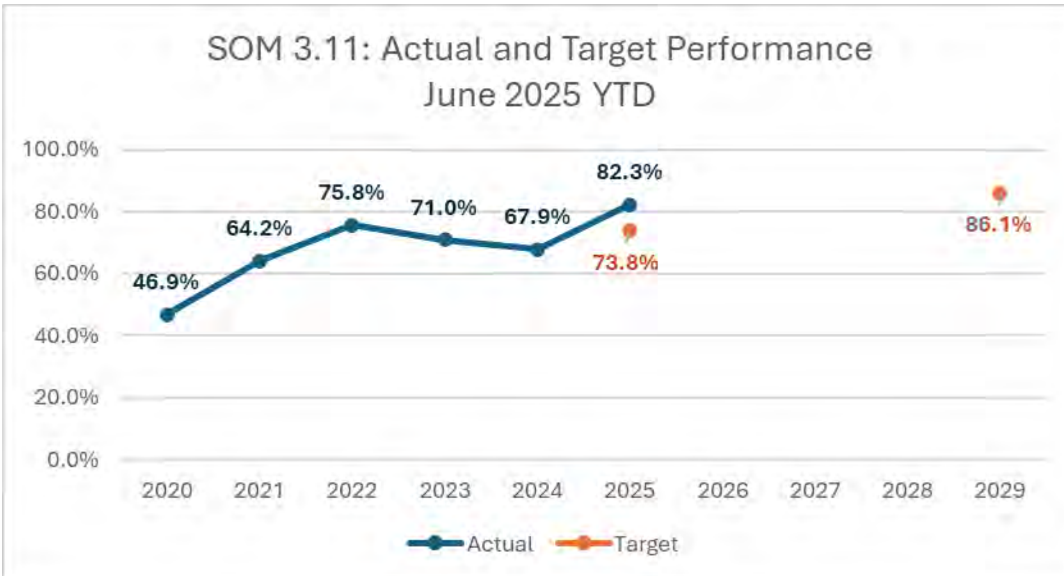
Transmission is completing Level 2 work 85.9 percent on time. This improvement is attributed to a reduction in competing priorities, allowing the Transmission team to dedicate greater focus toward completing HFTD notifications within the required timelines. Additionally, Transmission has begun appropriately leveraging G.O. 95, Rule 18 extensions for notifications that cannot be completed on time due to reasonable circumstances.

Distribution is completing Level 2 work 20.1 percent on time. This increase is driven by tracking of Level 2 notifications in greater detail, an increased number of tags being completed by megabundling, and the streamlining of inspection check lists in 2024 to reduce the creation of ineffective tags that have a lower risk of failure.

2. Progress Towards the 5-Year Target

As discussed in Section E below, PG&E is deploying a number of programs to maintain or improve long-term performance of this metric to meet the Company's 5-year performance target.

FIGURE 3.11-2
GO 95 CORRECTIVE ACTIONS IN HFTDS – HISTORICAL AND PROJECTED PERFORMANCE



Note: Historical performance for 2021 was changed since the last report from 64.8 percent to 64.2 percent per the findings of the SOM 2024 audit. This change does not change whether PG&E met the target for that year because there was no metric target for 2021, SOM's reporting started in 2022. The data errors have been resolved for Transmission and Vegetation Management. For Distribution, the issue is in progress of being addressed. PG&E has identified a population of notifications with erroneous compliance due dates and is conducting a root cause analysis.

E. (3.11) Current and Planned Work Activities

Below is a summary description of the key activities that are tied to performance and their description.

- Overhead Preventative Maintenance and Equipment Repair: Focuses on repair of electric equipment identified with corrective notifications. Our corrective notifications strategy is outlined in Section 3. Metric Performance for the Reporting Period.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.12

ELECTRIC EMERGENCY RESPONSE TIME

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ELECTRIC EMERGENCY RESPONSE TIME

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.12) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 3.12 – Electric Emergency Response Time is defined as:

Average time and median time in minutes to respond on-site to an electric related emergency notification from the time of notification to the time a representative (or qualified first responder) arrived onsite. Emergency notification includes all notifications originating from 911 calls and calls made directly to the utilities' safety hotline. The data used to determine the average time and median time shall be provided in increments as defined in General Order 112-F 123.2 (c) as supplemental information, not as a metric.

2. Introduction of Metric

This metric measures the average and median time for Pacific Gas and Electric Company (PG&E or the Company) to respond on-site to an electric emergency once a notification is received. Measuring response to calls into PG&E's Emergency line from first responder agencies within 60 minutes has been a long-standing, priority public safety measure for PG&E and within the industry, and this metric, although calculated differently, is similar in its intent for responding quickly to our customers and any potentially unsafe conditions reported.

3. Audit Results

In the Audit Report, Metric 3.12 received a Metric Accuracy Finding of "None." There were no Other Findings for this metric.[1]

[1] Audit Report, pg. 8, Table 1-1.

B. (3.12) Metric Performance

1. Historical Data (2015 – June 2025)

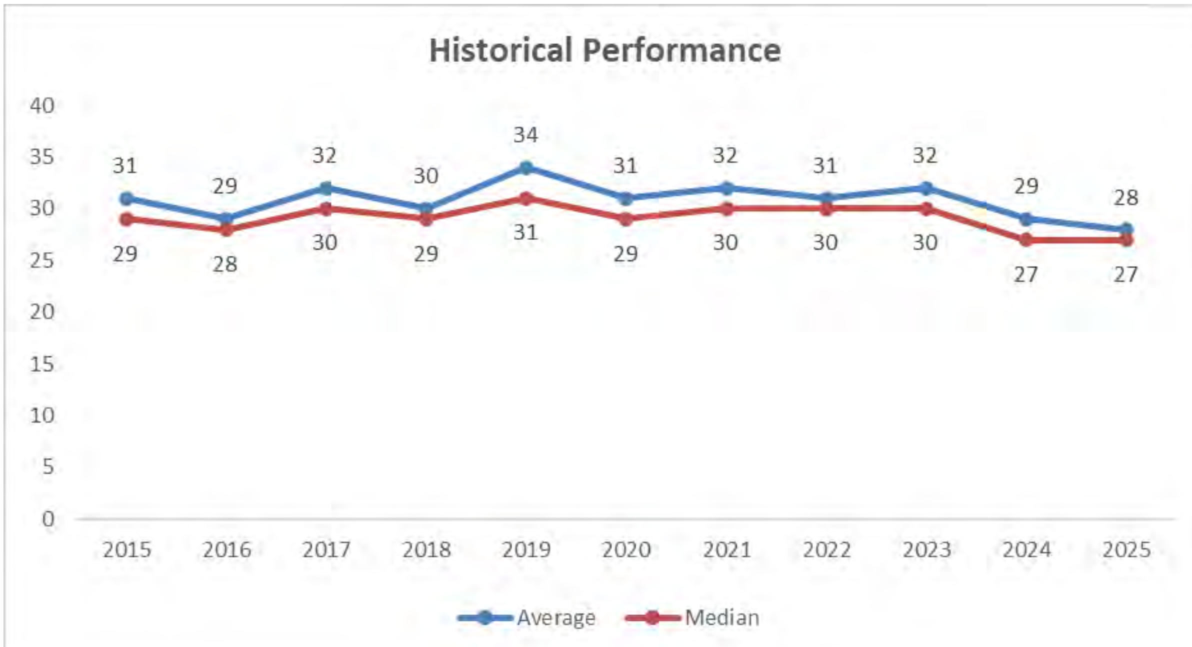
Historical data is provided from 2015 through June 2025. Although emergency response data exists prior to 2015 (as mentioned below), current validation practices were not in place until 2015 and therefore only data from 2015 and beyond is reported here for consistency and comparability.

Over the timeframe of 2015 through 2025 (Jan-June). There has been a 10 percent reduction in total average response time, from 31 minutes end of year average 2015 to 28 minutes in 2025. The median response time also reduced by 7 percent from 29 minutes end of year 2015 to 27 minutes in 2025.

Since 2015, PG&E's historical performance has been within the first quartile and has been in the first decile for several years when measuring percentage of response times within 60 minutes, which is the industry benchmarkable definition.

Metric performance has been driven by accurately predicting when large volumes of calls will occur (based on weather forecasts), proactive scheduling of resources for emergency response, cross-functional coordination across PG&E to train non-traditional stand-by staff, availability of resources for weather days and improved understanding of shifts in storm fronts that impact the system.

FIGURE 3.12-1
ELECTRIC EMERGENCY RESPONSE TIME HISTORICAL DATA
(2015-JUNE 2025)



Note: The data in this figure is subject to change based on continuing review of prior period usages.

2. Data Collection Methodology

The metric performance data is captured and stored in the Outage Information System (OIS) database. Each emergency call has a time stamp. The start time of an electric emergency call involves receipt by utility personnel and entry into the OIS database (creation of a tag). The tag is created in the OIS database when PG&E personnel are on the phone with the first responder dispatch agency (there is a direct PG&E Emergency line into Gas Dispatch, where all emergency calls are routed). This process removes the delay between the time the call is received and entered into the system, and the raw data is then reviewed for duplicate entries, which are cancelled (if found). The timestamp of when PG&E personnel respond on site is primarily when they select the “onsite” button on their mobile data terminals, which marks the completion of the response. If there is a discrepancy or uncertainty, our Electric Dispatch team will validate the exact arrival time by leveraging GPS data from our employee’s vehicles and/or mobile data terminals. The response time in minutes is calculated by the difference between the two timestamps. From each call's response time, the average and median time is calculated for all calls.

3. Metric Performance for the Reporting Period

In 2025 average Emergency Operations (EO) emergency response time was 28 minutes and median response time was 27 minutes. This is considered strong performance, as the corresponding benchmarkable calculation, percent response time within 60 minutes, remains at the top of industry performance.

C. (3.12) 1-Year and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

There have been no changes to 1- and 5 -Year targets since the last report filing.

2. Target Methodology

To establish the 1 -Year and 5 -Year targets, PG&E considered the following factors:[2]

- Historical Data and Trends: Comparable data is available starting in 2015 although historical benchmarking trends (under alternative definition) are informative back to 2012. This historical data context confirms PG&E's current results are improved, sustained, and reasonably considered strong performance, which has informed the target setting direction to "maintain;"
- Benchmarking: Industry benchmarking is available under the emergency response time measure calculated as percent time responding on site within 60 minutes. PG&E is first quartile within this benchmark, and has used this industry data as a key datapoint to inform target setting:
  - To do this, PG&E used available industry benchmark data in 2021 to set its initial electric emergency response targets for this metric. Specifically, these estimated values represent the point at which,

[2] Targets represent values that serve as appropriate indicator lights to signal a review of potential performance issues. Targets should not be interpreted as intention to worsen performance, as further described below.

– when exceeded, performance would move out of first quartile and into second quartile;

– PG&E's intent is to stay in first quartile performance. Given the context that benchmarking provides, PG&E targets are meant to maintain current performance at levels better than the first quartile threshold, and would consider a performance change on the magnitude of exceeding these targets (i.e., moving into a worse estimated quartile, a signal of concern);

– In other words, target values in this case represent performance levels that PG&E does not want to exceed or move performance towards. Values should not be interpreted as a plan for or expectation of worsening performance;

- <u>Regulatory Requirements</u>: None;
- <u>Attainable With Known Resources/Work Plan</u>: Yes;
- <u>Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement</u>: Historical data and trends confirm that maintaining estimated first quartile performance is a sustainable target in both the 1-year and 5-year timeframes. A change in performance on the magnitude of reaching the targets (i.e., performance moving into the estimated second quartile) is an appropriate indicator light to examine potential performance issues as PG&E's intent is to maintain current practices, past improvements, and mitigate any future operational impacts that may arise.
- <u>Other Considerations</u>: None.

3. 2025 Target

The 2025 target is to remain better than 44 minutes for average emergency response time and better than 43 minutes for median emergency response time. Targets are based on maintaining first quartile performance as benchmarked in 2021.

4. 2029 Target

The 2029 target is to remain better than 44 minutes for average emergency response time and better than 43 minutes for median emergency response time. Targets are based on maintaining first quartile performance.

D. (3.12) Performance Against Target

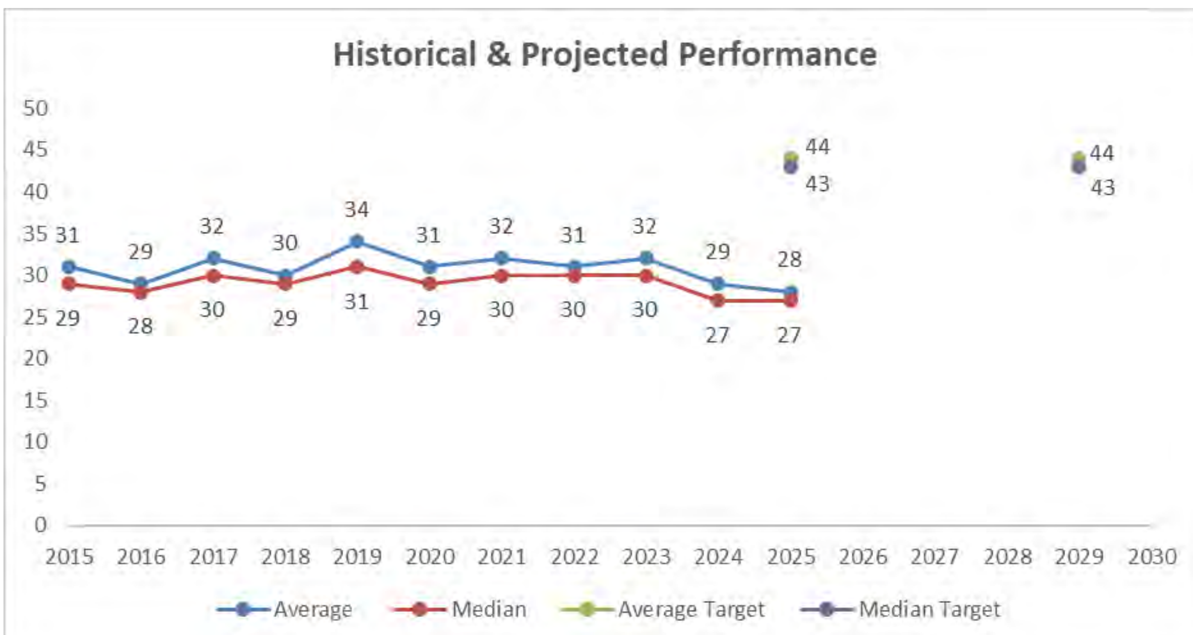
1. Progress Towards the 1-Year Target

As demonstrated in Figure 3.12-2 below, PG&E saw an average of 28 response minutes and a median of 27 response minutes in 2025 which is consistent with the Company's 1-year target.

2. Progress Towards the 5-Year Target

As discussed in Section E below, PG&E has deployed two programs to maintain or improve long term performance of this metric to meet the Company's 5-year performance target.

FIGURE 3.12-2
ELECTRIC EMERGENCY RESPONSE TIME HISTORICAL AND PROJECTED DATA



E. (3.12) Current and Planned Work Activities

PG&E continues to refine the following actions in 2025 to maintain its top quartile performance:

- <u>Meteorology, Operations, and Dispatch Support</u>:
  - In 2024, PG&E Meteorology validated and enhanced EO Emergency forecasting by using historical data to train their forecasting model and

to provide resource requirement recommendations based on predicted weather. Improved modeling allows for more effective staffing. In 2025, Electric Dispatch will continue to refine its electric emergency stand-by resource scheduling systems and process. The goal is to optimize the number of stand-by resources available in a geographic area to the forecasted system impacts.

  - Meteorology proactively reaches out to Electric Dispatch if a specific geographic area is looking to worsen over the forecast period.

- Blue-Sky Call Out Improvements: In 2025, PG&E is leveraging Lean problem solving to identify further actions to incrementally improve after-hours electric emergency call out performance.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.13

NUMBER OF CPUC-REPORTABLE IGNITIONS IN HFTD AREAS

(DISTRIBUTION)

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.13
NUMBER OF CPUC-REPORTABLE IGNITIONS IN HFTD AREAS
(DISTRIBUTION)

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SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.13
NUMBER OF CPUC-REPORTABLE IGNITIONS IN HFTD AREAS (DISTRIBUTION)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.13) Overview

1. Metric Definition

Safety and Operational Metrics (SOM) 3.13 – the Number of California Public Utilities Commission (CPUC) Reportable Ignitions in High Fire Threat Districts (HFTD) Areas (Distribution) is defined as:

The number of CPUC-reportable ignitions involving overhead distribution circuits in HFTD Areas.

A CPUC-Reportable Ignition refers to a fire incident where the following three criteria are met: (1) ignition is associated with Pacific Gas and Electric Company (PG&E) electrical assets, (2) something other than PG&E facilities burned, and (3) the resulting fire travelled more than one linear meter from the ignition point.[1]

For this SOM, reporting is specific to Tier 2 and Tier 3 HFTDs.

PG&E provides the CPUC with annual ignition data in the Fire Incident Data Collection Plan, to the Office of Energy Infrastructure and Safety quarterly via quarterly geographic information system, data reporting, in quarterly Wildfire Mitigation Plan updates, and the Safety Performance Metrics Report.

2. Introduction of Metric

The number of CPUC-reportable ignitions in HFTDs provides one way to gauge the level of wildfire risk that customers and communities are exposed to from overhead distribution assets. PG&E's objective is to reduce the number of CPUC reportable ignitions that may trigger a catastrophic wildfire.

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[1] Please see CPUC Decision (D.) 14-02-015, issued February 5, 2014 for additional details.

3. Audit Results

In the Audit Report, Metric 3.14 received a Metric Accuracy Finding of "None." The Other Findings for this metric were "Some discrepancy between event coordinates and HFTD designations that did not impact metric results."[2] The findings have been resolved.

After review of the data, PG&E has confirmed that the HFTD designations for ignitions data come from the fire latitude and longitude based on the fire start location and not the outage location, and therefore no further action was necessary to ensure accuracy.

B. (3.13) Metric Performance

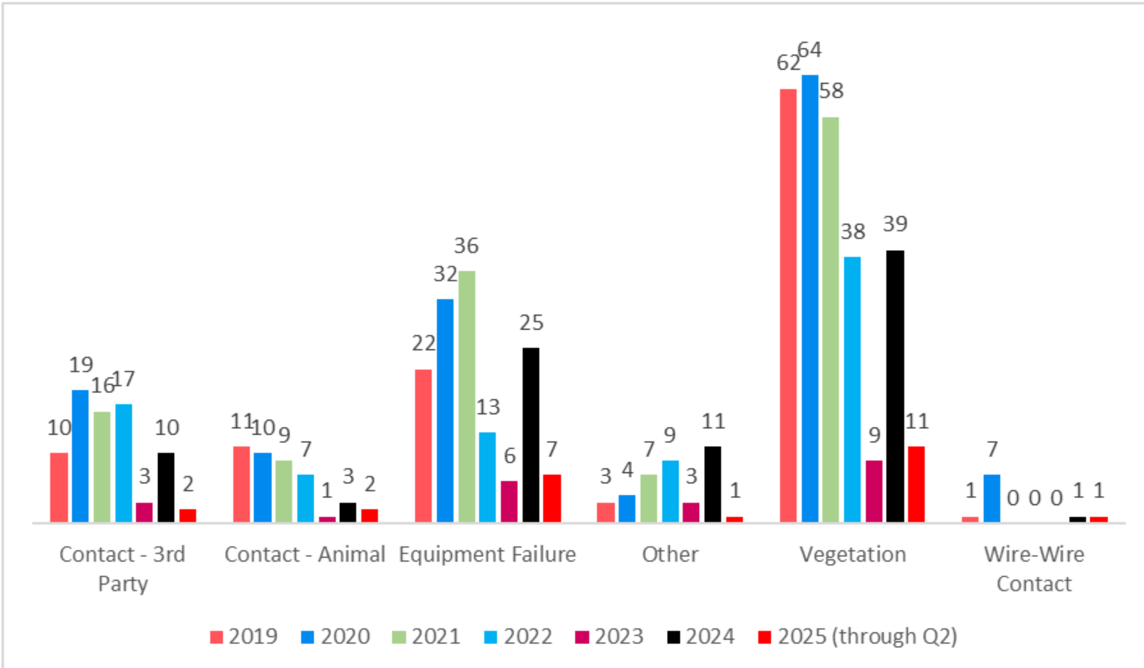
1. Historical Data (2015 – June 2025)

PG&E implemented the Fire Incident Data Collection Plan in response to D.14-02-015 in June 2014. PG&E's Ignitions Tracker includes all CPUC-reportable ignitions from June 2014 to present. The 2014 data does not represent a complete year and is excluded in this analysis.

PG&E's overhead distribution circuits traverse approximately 25,000 miles of terrain in the HFTD areas where the overhead conductor is primarily bare wire, supported by structures consisting of poles, cross arms, associated insulators, and operating equipment such as transformers, fuses and reclosers. The main causes of CPUC-reportable ignitions have been collected and classified. These fall into six broad categories: vegetation contact, equipment failure, third-party contact, animal contact, wire to wire contact, and other causes. The counts for 2019 through Q2 2025, are shown in the graph below, highlighting the degree of variability that occurs from year to year relative to each category.

2 Audit Report, p. 8, Table 1-1.

FIGURE 3.13-1
DISTRIBUTION HISTORIC PERFORMANCE BY SUSPECTED CAUSE



There is also a seasonal pattern to the ignition events as shown in the chart of ignitions by month below for each of the years from 2019 through Q2 2025.

FIGURE 3.13-2
HISTORIC PERFORMANCE BY YEAR/MONTH

Month	2019 Total	2020 Total	2021 Total	2022 Total	2023 Total	2024 Total	2025 through Q2
January	1	0	19	2	0	0	1
February	0	7	2	5	8	1	0
March	2	3	5	4	2	4	1
April	4	3	6	9	6	2	1
May	8	9	17	11	4	10	9
June	14	25	22	14	2	13	12
July	23	23	24	12	8	20	0
August	15	27	17	10	14	10	0
September	16	17	7	9	8	13	0
October	13	17	6	7	2	9	0
November	12	2	0	1	2	5	0
December	1	3	1	0	1	2	0
Grand Total	109	136	126	84	57	89	24

2. Data Collection Methodology

Data will be collected per PG&E’s Fire Incident Data Collection Plan (Utility Standard/Procedure RISK-6306S/P). Results will be inclusive of unique HFTD CPUC-reportable ignitions attributable to the distribution asset class with overhead construction types.

The following ignition events captured by PG&E's Fire Incident Data Collection Plan will be excluded for this metric:

- Duplicate events;
- Ignitions that do not meet CPUC reporting criteria;
- Ignition events outside of Tier 2 and Tier 3 HFTD;
- Transmission ignitions; and
- Ignitions attributable to underground or pad-mounted assets as these are not associated overhead assets. (Ignitions caused by non-overhead assets in HFTD are rare and, as the fires are often contained to the asset, pose less of a wildfire risk.)

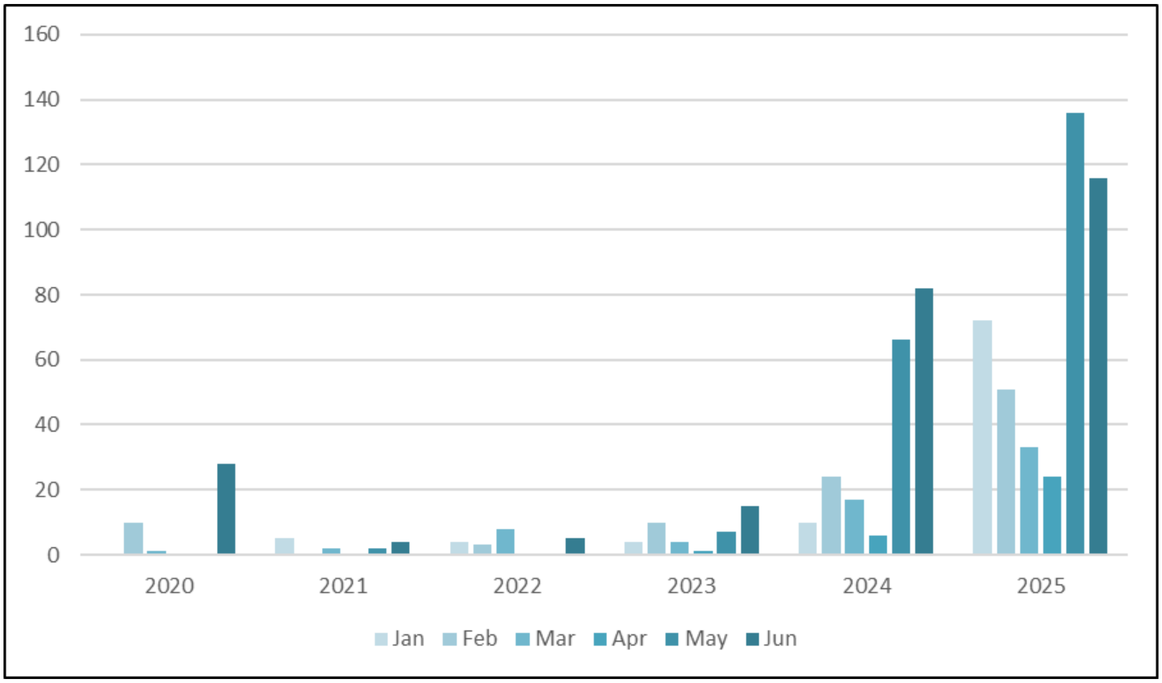
3. Metric Performance for the Reporting Period

PG&E finished this reporting period of 2025 with 24 CPUC reportable ignitions in HFTD, attributable to overhead distribution assets. These results are lower than reported for the same time period last year (31 ignitions) and the three-previous-year average (33 ignitions).

Most importantly, PG&E has observed 13 ignitions where the Fire Potential Index Rating (FPI) was in R3 or greater conditions. This number is higher than the 3-year previous average (6 ignitions). This is driven by an earlier wildfire season in California in 2025; as evidenced by the total number of California Department of Forestry and Fire Protection (CAL FIRE) and U.S. Forest Service (USFS) incidents (generally fires over 10 acres in size). The figure below shows the total count of CAL FIRE and USFS Incidents in California by year since 2020 for the first half of the year. Similar to 2024, 2025 observed an increased volume of incidents in May and June than in previous recent years.

While we observed an earlier season start, fire weather has remained relatively mild in the month following this reporting period.

FIGURE 3.13-3
TOTAL CAL FIRE AND USFS INCIDENTS IN CALIFORNIA BY YEAR
(JANUARY THROUGH JUNE)



PG&E is dedicated to eliminating ignition events when and where they represent wildfire risk. Please see the Target Methodology section for an overview of our FPI model and our strategy to focus operational mitigations, like Enhanced Powerline Safety Settings (EPSS), on reducing ignitions where consequences are more likely.

C. (3.13) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

PG&E proposes no changes to the 1 and 5-year targets for this period. PG&E has set the 2025 and 2029 upper and lower limit target ranges to account for the previous 5 years of actual results and variability driven by weather and external factors.

PG&E remains focused on reducing those ignitions in R3+ conditions and, as future strategies with direct ignition impact emerge, these targets will be reevaluated.

2. Target Methodology

The two major programs that most directly impact ignition reduction in the near-term are Public Safety Power Shut Off (PSPS) and EPSS. Other important resiliency programs like undergrounding, system hardening, and vegetation management (VM) will have an impact as multiple years of cumulative work are completed.

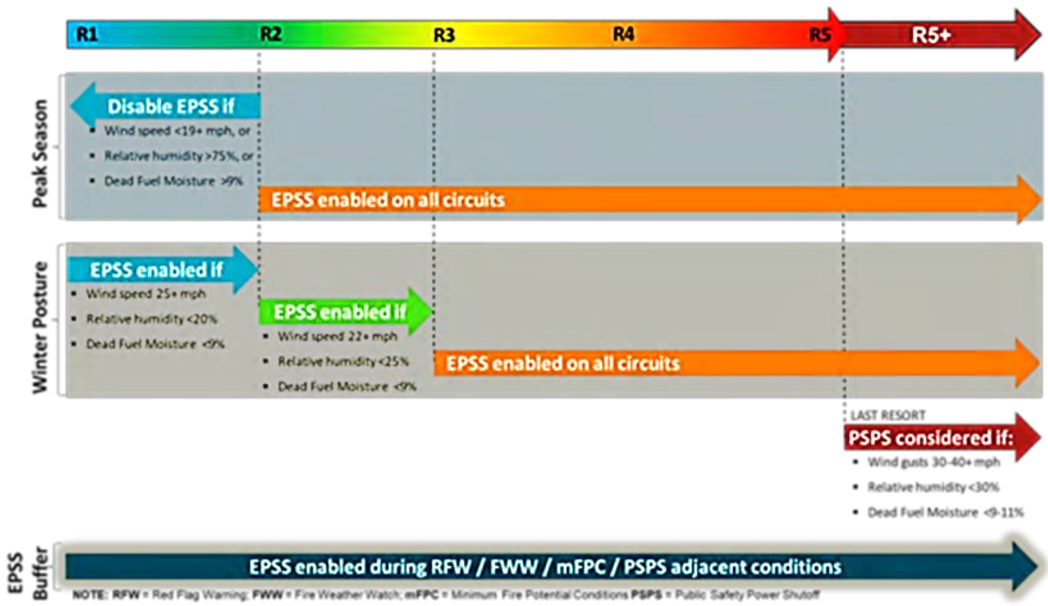
PG&E has observed success with EPSS in terms of mitigating ignitions in R3+ FPI conditions. These ignitions in R3+ conditions represent all historical reportable ignitions resulting in a fatality, all ignitions over 100 acres in size, and 99 percent of reportable ignitions where a structure was destroyed. See Figure 3.13-4 for fire statistics by FPI rating.

FIGURE 3.13-4
2018-2020 HFTD OVERHEAD REPORTABLE IGNITION STATISTICS BY FPI, ALL ASSET CLASSES

	R2+	R3+
% of Total Reportable Ignitions in HFTD	84%	60%
% of Wildfires >10 Acres	81%	71%
% of Wildfires >100 Acres	100%	100%
% of Total Structures Destroyed	100%	99%
% of Total Fatalities	100%	100%

In 2022, PG&E enabled EPSS technology on over 1,000 circuits, protecting approximately 44,000 overhead distribution miles in our service territory, including all distribution milage within HFTD. We also refined when to enable this tool to mitigate fires of consequence by targeting the right meteorological conditions. When a circuit is forecasted to be in FPI conditions at a specific threshold based on peak season or winter posture, EPSS is enabled on protective devices. See Figure 3.13-5 for details on this enablement criteria.

FIGURE 3.13-5
EPSS ENABLEMENT CRITERIA BASED ON FPI AND SEASON POSTURE



In 2023, PG&E expanded on the capabilities of this program to reduce ignitions where and when they matter by layering additional system protection strategies to complement the capabilities of EPSS, including installing a Downed Conductor Detection (DCD) algorithm on recloser controllers.

In 2024, PG&E established taskforce to identify immediate actions to mitigate in light of the rising exposure (that manifested into increased ignition counts) and perform a cause evaluation to identify the root and contributing causes to an increase in ignitions throughout the year. In additional proactive mitigation taskforce was launched in 2025 to immediately mitigate additional ignition risk in 2025.

PG&E expects continued success with the EPSS Program to reduce ignitions of consequence in 2025 and is actively exploring additional layers of protection through technology deployment to further reduce risk (please see Current and Planned Work Activities).

However, ignition counts (in both low and potentially high consequence environments) are dependent on weather conditions and are highly variable. As a result, PG&E forecasts a range of 70 to 128 reportable ignitions to account for variability.

To establish the 1-year and 5-year targets, PG&E considered the following factors:

- Historical Data and Trends: PG&E has layered significant wildfire mitigation strategies over the past 8 years (like EPSS) and, outside of PG&E's own ignition record, there is no comparable historical data to help guide in target setting. PG&E is utilizing the previous 5-years worth of ignition actuals (2020 – 2024) to propose 2025 and 2029 target setting;
- Benchmarking: PG&E benchmarks extensively with other utilities in terms of wildfire risk and ignition reduction. Specifically, PG&E reviews utility ignition trends (where available) and analyzes the risk associated large utility wildfires around the world;
- Regulatory Requirements: D.14-02-015;
- Attainable Within Known Resources/Work Plan: Yes;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The targets for this metric are suitable for Enhanced Oversight and Enforcement as they consider the potential for an increase in severe weather events due to climate change; and
- Other Qualitative Considerations: The target range takes consideration for some variability in weather.

3. 2025 Target

The 2025 target is 70-128 ignitions. The upper end of this range represents the 5-year previous average (99 ignitions) with an additional full standard deviation (29 ignitions) for those same years to account for variability. The lower end of this range represents a full standard deviation reduction to that same average.

4. 2029 Target

The 2029 target is 70-128 ignitions. The upper end of this range represents the 5-year previous average (99 ignitions) with an additional full standard deviation (29 ignitions) for those same years to account for variability. The lower end of this range represents a full standard deviation reduction to that same average. Additional time and maturity of PG&E's wildfire mitigations strategies will allow PG&E to reduce ignitions in R3+

conditions and forecast the effectiveness of the EPSS Program to help inform long-term target ranges.

D. (3.13) Performance Against Target

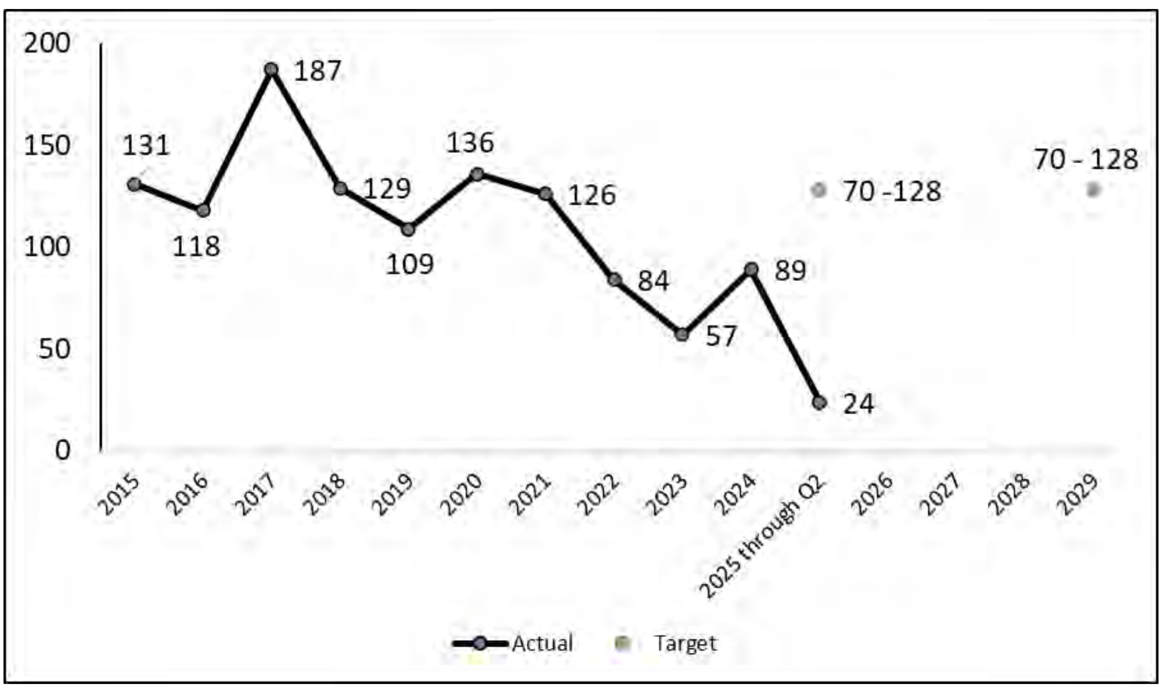
1. Progress Towards the 1-Year Target

As demonstrated in Figure 3.13-6 below, PG&E ended this reporting period with 24 ignitions. We are expected to complete 2025 within our target of 70 – 128 ignitions.

2. Progress Towards the 5-Year Target

PG&E is on track to reach our 5-year goal. Outlined in Section E below, PG&E continues to deploy several programs outside of the EPSS Program designed to improve the long-term performance of ignitions in R3+ conditions (where and when they matter) and further our goals of ending catastrophic wildfires associated with utility assets.

FIGURE 3.13-6
HISTORICAL PERFORMANCE (2015-Q2 2025)
AND TARGETS (2025 AND 2029)



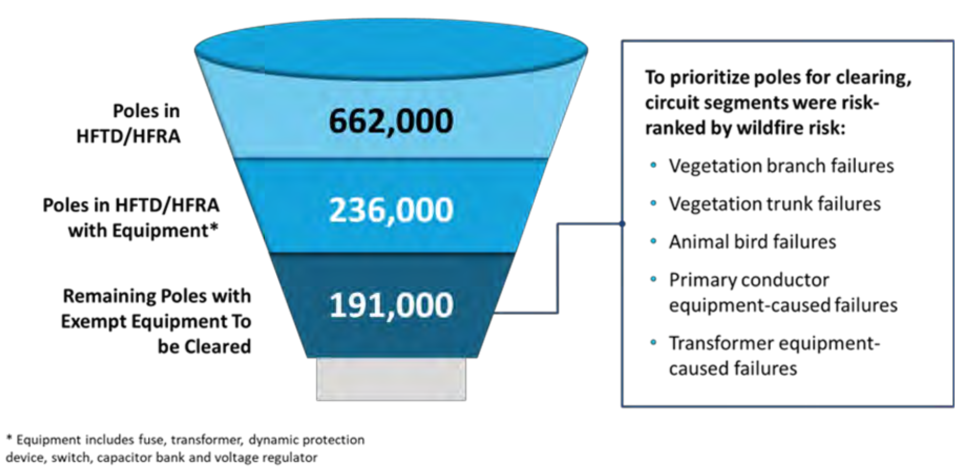
E. (3.13) Current and Planned Work Activities

PG&E can expect to see improved performance on this metric through continual execution of the Wildfire Mitigation Plan (WMP) and maturation of key wildfire mitigation strategies, including:

- Proactive Ignition Mitigation Taskforces: On July 11, 2024, we initiated the R3+ Task Force Taskforce to identify immediate actions to mitigate the rising ignition trend seen during an early July heat wave. In additional proactive mitigation taskforce was launched in 2025 to immediately mitigate additional ignition risk in 2025. Mitigations implemented for overhead distribution included pole clearing, expulsion fuse replacement, expedited completion of infrared tags and bird nest clearing tags, installation of Gridscope devices, and addition of AI-enabled wildfire cameras.

  Pole clearing involves identifying and removing flammable material, brush, limbs, and foliage around electric poles and towers. As part of California Public Resources Code § 4292, we clear a 10-foot radius of vegetation around approximately 78,000 poles. As almost half of reportable ignitions in HFTD or High Fire Risk Area (HFRA) in 2023 and 2024 originated within approximately 10 feet of the base of a pole, pole clearing was identified as a mitigation with significant potential to reduce the risk of ignitions starting at the base of the pole. An additional set of approximately 50,000 distribution poles with overhead equipment were cleared as part of the Task Force, prioritized using the funnel shown in the below figure.

FIGURE 3.13-7
R3+ PROACTIVE POLE CLEARING PRIORITIZATION



SMU expulsion Fuses (e-Fuses) have been observed to fail catastrophically. In some cases, the failure can cause an ignition. The primary mitigation for these e-Fuses is vegetation clearing at the base of the pole. However, the Task Force recommended replacing roughly 2,500 e-Fuses at 1,000 poles that could not easily be cleared of vegetation at the base of the pole.

Infrared tags result from a test that scans the distribution system looking for bad connections or equipment using infrared imaging. The Task Force recommended expediting the completion of 84 open infrared tags in HFTD and HFRA to resolve any identified faulty equipment prior to the remainder of the wildfire season.

Due to the observed increase in bird contact-related ignitions in July 2024, the Task Force recommended expediting 70 open bird nest tags on the distribution system to clear known bird's nests in HFTD or HFRA.

The Task Force performed a review of EPSS ignition rates over the 2022, 2023, and the partial 2024 wildfire seasons based on delay times. The Task Force observed higher rates of outages becoming ignitions for delay times greater than 60ms and recommended additional investigation into shorter EPSS device delay times during periods of elevated ignition likelihood. Three circuits with devices with delay times greater than 60ms were selected to implement delay times on the circuits that were less than 60ms. This pilot is continuing in 2025 and may be expanded to additional circuits if successful.

Gridscope devices are pole-mounted sensors designed to detect fault conditions such as line breaks, pole tilt, wire-to-wire contact, or arcing. In addition, Gridscope can enable improved fault localization and identification to dispatch troubleshooters to the location of a fault rather than requiring them to patrol an entire circuit. Gridscope was piloted on a variety of EPSS-enabled circuit segments across the service territory prior to the initiation of the Task Force. Subsequently, the Task Force recommended additional Gridscope installations for a second set of circuit segments on four-wire circuits where traditional Downed Conductor Detection is not effective and other circuit segments with elevated wildfire risk based on vegetation contact, conductor failure, and bird contact. To date, we have approximately 10,000 Gridscope devices installed throughout the system. In 2025, we are deploying an additional 10,000 sensors and developing additional processes and procedures to enable integration with other sensors and dispatch tools that we currently use.

AI-enabled wildfire cameras can detect a wildfire and alert local agencies, which leads to quicker response and wildfire containment. The Company reviewed the current viewshed across the service territory and developed a list of locations where the viewshed could be improved with the installation of additional wildfire cameras. To date, we have 643 wildfire cameras that cover the viewshed of over 90 percent of our territory. An additional 69 cameras are planned for installation in 2025.

- Maturation of the EPSS Program: In July 2021, to address this dynamic climate challenge, we implemented the EPSS Program on approximately 11,500 miles of distribution circuits, or 45 percent of the circuits in HFTD areas. With EPSS, we engineered changes to our electrical equipment settings so that if an object such as vegetation contacts a distribution line, power is automatically shut off within 1/10th of a second, reducing the potential for an ignition. EPSS enabled settings provide a layer of protection on days when the wind speeds are low. EPSS is especially important during hot dry summer days when there are low winds. Continued low relative humidity, low fuel moistures levels, and areas where the volume of dry vegetation is in close proximity to the distribution lines, increases the risk of an ignition becoming a large wildfire.

  In 2022, we expanded the EPSS scope to all primary distribution conductor in HFRA areas in our service territory, as well as select non HFRA areas. In concert with this expansion of the program, PG&E modified enablement criteria (improving risk reduction and reliability).

  In 2023, PG&E implemented a DCD algorithm on recloser controllers to mitigate risk of low current fault conditions, also referred to as high-impedance faults.

  In 2024, PG&E matured high-impedance fault protection by adjusting Sensitive Ground Fault relay settings and piloting new technology to add DCD-like protection to the small number of circuit miles where we are not capable of implementing DCD. This work continues in 2025.

Please see Section 8.1.8.1.1, Protective Equipment and Device Settings in PG&E's 2023-2025 WMP for additional details.

- Public Safety Power Shut Off (PSPS): PSPS is a wildfire mitigation strategy, first implemented in 2019, to reduce powerline ignitions during severe weather by proactively de-energizing powerlines (remove the risk of those powerlines causing an ignition) prior to forecasted wind events when humidity levels and fuel conditions are conducive to wildfires. PG&E's focus with the PSPS Program is to mitigate the risks associated with a catastrophic wildfire and to prioritize customer safety. In 2021, PG&E continued to make progress to its PSPS Program to mitigate wildfire risk, including updating meteorology models and scoping processes. In 2023, PG&E continued a multi-rear effort to install additional distribution sectionalizing devices, Fixed Power Solutions, and other mitigations targeted at reducing the risk of wildfire. In 2024, we updated our thresholds utilizing new and improved risk models.

  Please see Section 9, PSPS, Including Directional Vision For PSPS in PG&E's 2023-2025 WMP for additional details.

- Grid Design and System Hardening: PG&E's broader grid design program covers several significant programs to reduce ignition risk, called out in detail in PG&E's 2023 WMP. The largest of these programs is the System Hardening Program which focuses on the mitigation of potential catastrophic wildfire risk caused by distribution overhead assets. In 2023, we rapidly expanded our system hardening efforts by:
  - Completing 420 circuit miles of system hardening work, which includes overhead system hardening, undergrounding and removal of overhead lines in HFTD or buffer zone areas;
  - Completing at least 350 circuit miles of undergrounding work, including Butte County Rebuild efforts and other distribution system hardening work; and
  - In 2024, PG&E completed ~250 miles of undergrounding.

As we look to 2025, PG&E is targeting 350 miles of undergrounding to be completed in 2025 as part of the 10,000 Mile Undergrounding Program. This system hardening work done at scale is expected to have a material impact on ignition reduction.

Please see Section 8.1.2, Grid Design and System Hardening Mitigations in PG&E's 2023-2025 WMP for additional details.

- VM: We restructured our VM Program based on a risk-informed approach. Recent data and analysis demonstrate that the Enhanced Vegetation Management (EVM) Program risk reduction is less than EPSS and additional Operational Mitigations. As a result, we transitioned the EVM Program to three new risk-informed VM programs.
  - Focused Tree Inspections: We developed specific areas of focus (referred to as Areas of Concern), primarily in the HFRA, where we will concentrate our efforts to inspect and address high-risk locations, such as those that have experienced higher volumes of vegetation damage during PSPS events, outages, and/or ignitions.
  - VM for Operational Mitigations: This program is intended to help reduce outages and potential ignitions using a risk informed, targeted plan to mitigate potential vegetation contacts based on historic vegetation caused outages on EPSS-enabled circuits. We will initially focus on mitigating potential vegetation contacts in circuit protection zones that have experienced vegetation caused outages. Scope of work will be developed by using EPSS and historical outage data and vegetation failure from the Wildfire Distribution Risk Model v3 risk model. EPSS-enabled devices vegetation outages extent of condition inspections may generate additional tree work.
  - Tree Removal Inventory: This is a long-term program intended to systematically work down trees that were previously identified through EVM inspections. We will develop annual risk-ranked work plans and mitigate the highest risk-ranked areas first and will continue monitor the condition of these trees through our established inspection programs.

  Please see Section 8.2.2, Vegetation Management and Inspections in PG&E's 2023–2025 WMP for additional details.

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SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.14

PERCENTAGE OF CPUC-REPORTABLE IGNITIONS IN HFTD AREAS

(DISTRIBUTION)

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CHAPTER 3.14
PERCENTAGE OF CPUC-REPORTABLE IGNITIONS IN HFTD AREAS (DISTRIBUTION)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.14) Overview

1. Metric Definition

Safety and Operational Metrics (SOM) 3.14 – The number of California Public Utilities Commission (CPUC) Reportable Ignitions in High Fire Threat Districts (HFTD) areas (Distribution) is defined as:

The number of CPUC-reportable ignitions involving overhead (OH) distribution circuits in HFTD areas divided by circuit miles of OH distribution lines in HFTD multiplied by 1000 miles (ignitions per 1000 HFTD circuit miles).

A CPUC-Reportable Ignition refers to a fire incident where the following three criteria are met: (1) Ignition is associated with PG&E electrical assets, (2) something other than PG&E facilities burned, and (3) the resulting fire travelled more than one linear meter from the ignition point.[1]

For this SOM, reporting is specific to Tier 2 and Tier 3 HFTDs.

PG&E provides the CPUC with annual ignition data in the Fire Incident Data Collection Plan, to the Office of Energy Infrastructure and Safety quarterly via quarterly geographic information system, data reporting, in quarterly Wildfire Mitigation Plan updates, and the Safety Performance Metrics Report.

2. Introduction of Metric

The number of CPUC-reportable Ignitions in HFTDs, normalized by circuit mileage, provides one way to gauge the level of wildfire risk that customers and communities are exposed to from OH distribution assets.

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[1] Please CPUC Decision (D.) 14-02-015, issued February 5, 2014, for additional details.

PG&E's objective is to reduce the number of CPUC-reportable ignitions that may trigger a catastrophic wildfire.

3. Audit Results

In the Audit Report, Metric 3.14 received a Metric Accuracy Finding of "None." The Other Findings for this metric was "Some discrepancy between event coordinates and HFTD designations that did not impact metric results. Line miles were inconsistent amongst reports and data sources."[2] The findings have been resolved.

With respect to the HFTD designations, after view of the data PG&E has confirmed that the HFTD designations for ignitions data comes from the fire latitude and longitude based on the fire start location and not the outage location, and therefore no further action was necessary to ensure accuracy.

With respect to the line miles, we are coordinating to ensure accuracy amongst reports and data sources going forward.

B. (3.14) Metric Performance

1. Historical Data (2015 – June 2025)

PG&E implemented the Fire Incident Data Collection Plan, in response to D.14-02-015, in June 2014 and our record, the Ignitions Tracker, includes all CPUC-reportable ignitions from June 2014 to present. The 2014 data does not represent a complete year and is excluded in this analysis.

PG&E's OH distribution circuits traverse approximately 25,000 miles of terrain in the HFTD areas where the OH conductor is primarily bare wire, supported by structures consisting of poles, cross arms, associated insulators, and operating equipment such as transformer, fuses and reclosers. Given the volume of equipment within the 25,000 miles of HFTD, the annual number of CPUC-reportable ignitions is too low to detect any statistical pattern.

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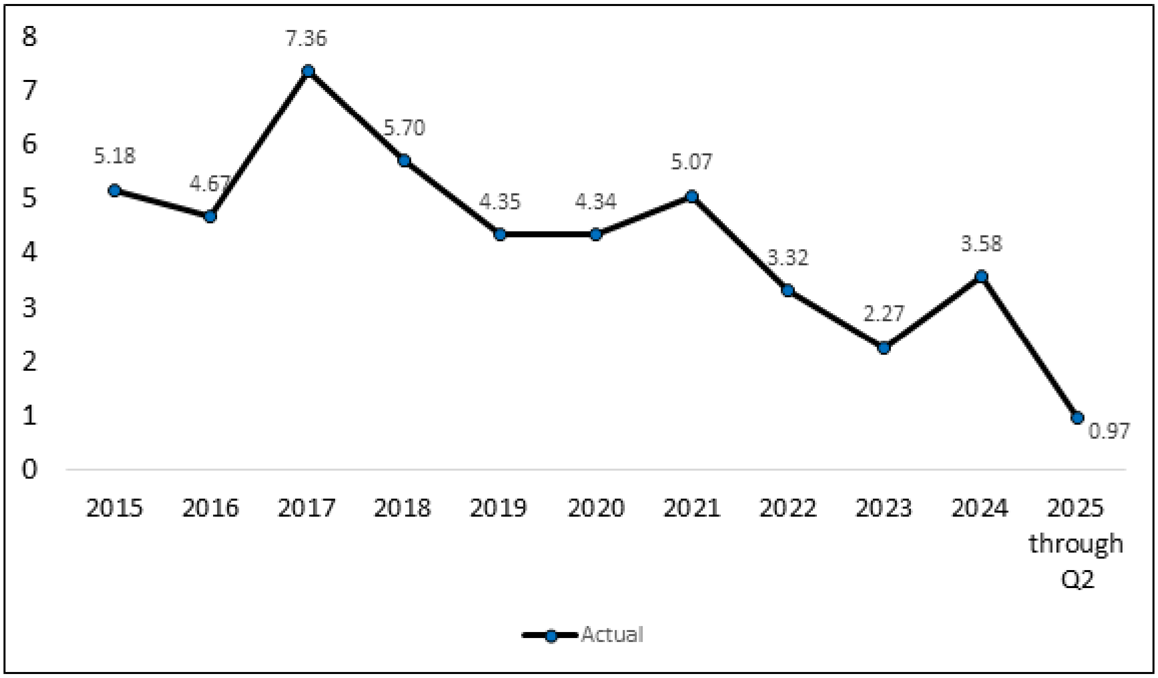
[2] Audit Report, pg. 8, Table 1-1.

FIGURE 3.14-1
HISTORICAL PERFORMANCE
(2015 – Q2 2025)



2. Data Collection Methodology

Data will be collected per PG&E's Fire Incident Data Collection Plan (Utility Standard/Procedure RISK-6306S/P). Results will be inclusive of unique HFTD CPUC-reportable ignitions attributable to the distribution asset class with OH construction types.

The following ignition events captured by PG&E's Fire Incident Data Collection Plan) will be excluded for this metric:

- Duplicate events;
- Ignitions that do not meet CPUC reporting criteria;
- Ignition events outside of Tier 2 and Tier 3 HFTD;
- Transmission Ignitions; and
- Ignitions attributable to underground or pad mounted assets as these are not associated OH assets. (Ignitions caused by non-OH assets in HFTD are rare and, as the fires are often contained to the asset, pose less of a wildfire risk.)

The circuit mileage utilized to calculate the 2015-2022 performance of this metric originates from PG&E's Electrical Asset Data Reports, refreshed

December 2022. The 2023 – 2024 performance and targets are based on an updated sum of overhead circuit mileage, refreshed in 2023.

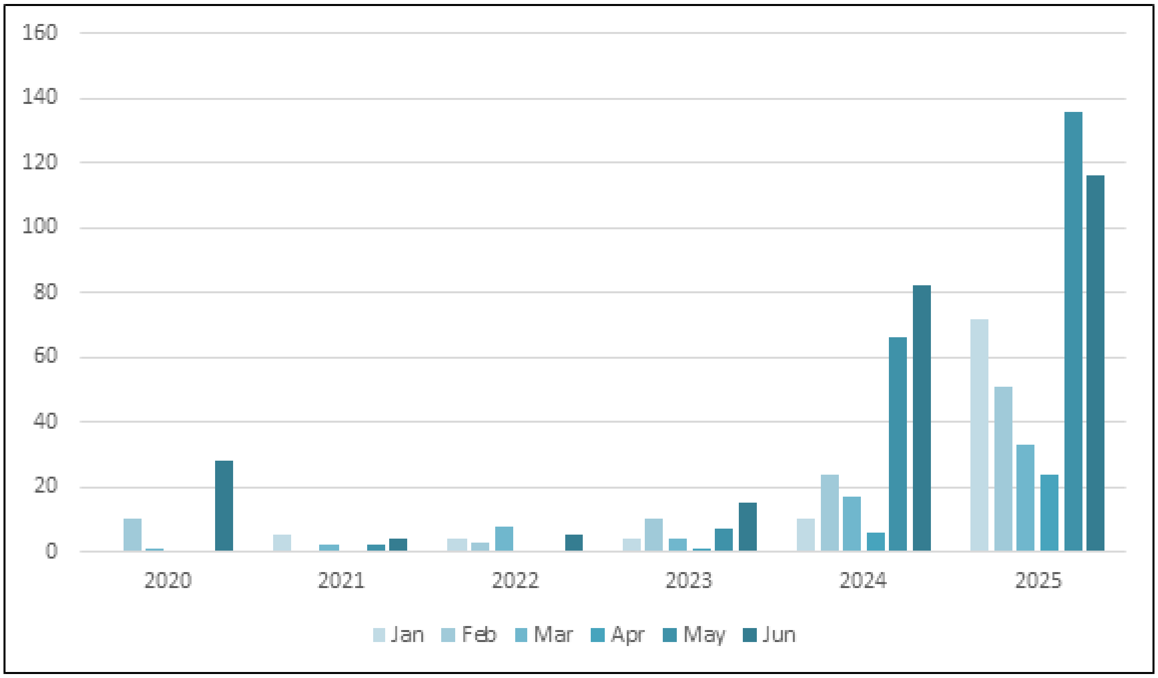
3. Metric Performance for the Reporting Period

PG&E finished this reporting period of 2025 with 24 CPUC-reportable ignitions in HFTD attributable to overhead distribution assets (corresponding to a rate of 0.97 ignitions per 1,000 circuit miles). These results are lower than reported for the same time period last year (31 ignitions) and three-previous-year average (33 ignitions).

Most importantly, PG&E has observed 13 ignitions where the Fire Potential Index Rating (FPI) was in R3 or greater conditions. This number is higher than the 3-year previous average (6 ignitions). This is driven by an earlier wildfire season in California in 2025; as evidenced by the total number of CAL FIRE and US Forest Service incidents (generally fires over 10 acres in size). The figure below shows the total count of CAL FIRE and US Forest Service Incidents in California by year since 2020 for the first half of the year. Like in 2024, 2025 observed an increased volume of incidents in May and June than in previous recent years.

While we observed an earlier season start, fire weather has remained relatively mild in the month following this reporting period.

FIGURE 3.14-2
TOTAL CAL FIRE AND USFS INCIDENTS IN CALIFORNIA BY YEAR
JANUARY THROUGH JUNE



PG&E is dedicated to eliminating ignition events when and where they represent wildfire risk. Please see the Target Methodology section for an overview of our FPI model and our strategy to focus operational mitigations, like Enhanced Powerline Safety Settings (EPSS), on reducing ignitions where consequences are more likely.

C. (3.14) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

PG&E proposes no changes to the 1 and 5-year targets for this period. PG&E has set the 2025 and 2029 upper and lower limit target ranges to account for the previous 5 years of actual results and variability driven by weather and external factors.

PG&E remains focused on reducing those ignitions in R3+ conditions and, as future strategies with direct ignition impact emerge, these targets will be reevaluated.

2. Target Methodology

The two major programs that most directly impact ignition reduction in the near-term are Public Safety Power Shut Off (PSPS) and EPSS. Other important resiliency programs like undergrounding, system hardening, and vegetation management will have an impact as multiple years of cumulative work are completed.

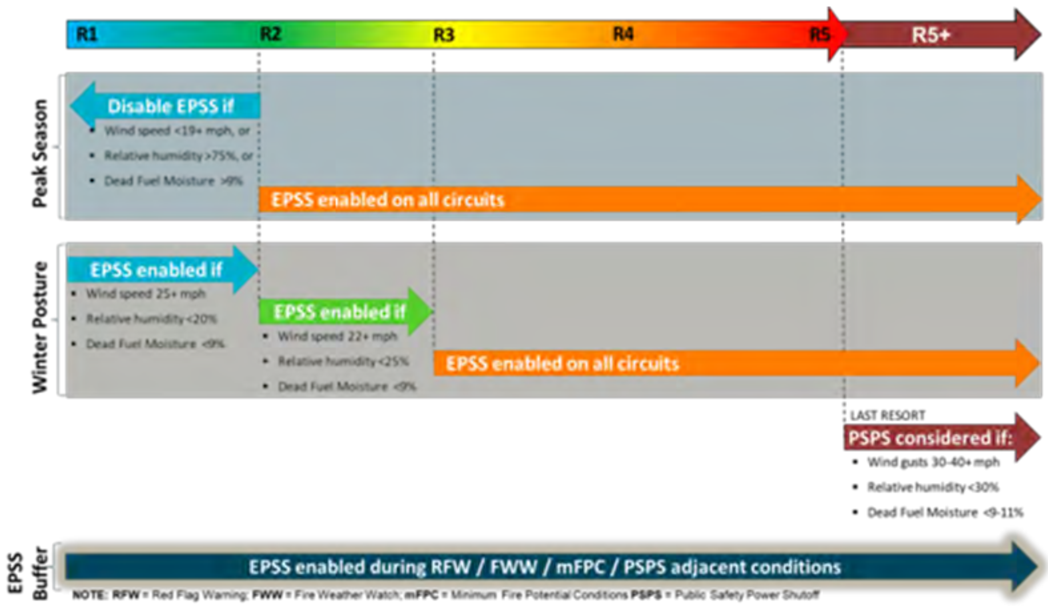
PG&E has observed success with EPSS in terms of mitigating ignitions in R3+ FPI conditions. These ignitions in R3+ conditions represent all historical reportable ignitions resulting in a fatality, all ignitions over 100 acres in size, and 99 percent of reportable ignitions where a structure was destroyed. See Figure 3.14-3 for fire statistics by FPI rating.

FIGURE 3.14-3
2018-2020 HFTD OVERHEAD REPORTABLE IGNITION STATISTICS BY FPI, ALL ASSET CLASSES

	R2+	R3+
% of Total Reportable Ignitions in HFTD	84%	60%
% of Wildfires >10 Acres	81%	71%
% of Wildfires >100 Acres	100%	100%
% of Total Structures Destroyed	100%	99%
% of Total Fatalities	100%	100%

In 2022, PG&E enabled EPSS technology on over 1,000 circuits, protecting approximately 44,000 overhead distribution miles in our service territory, including all distribution milage within HFTD. We also refined when to enable this tool to mitigate fires of consequence by targeting the right meteorological conditions. When a circuit is forecasted to be in FPI conditions at a specific threshold based on peak season or winter posture, EPSS is enabled on protective devices. See Figure 3.14-4 for details on this enablement criteria.

FIGURE 3.14-4
EPSS ENABLEMENT CRITERIA BASED ON FIRE POTENTIAL INDEX AND SEASON POSTURE



In 2023, PG&E expanded on the capabilities of this program to reduce ignitions where and when they matter by layering additional system protection strategies to complement the capabilities of EPSS, including installing a Downed Conductor Detection (DCD) algorithm on recloser controllers.

In 2024, PG&E established taskforce to identify immediate actions to mitigate in light of the rising exposure (that manifested into increased ignition counts) and perform a cause evaluation to identify the root and contributing causes to an increase in ignitions throughout the year. In additional proactive mitigation taskforce was launched in 2025 to immediately mitigate additional ignition risk in 2025.

PG&E expects continued success with the EPSS program to reduce ignitions of consequence in 2025 and is actively exploring additional layers of protection through technology deployment to further reduce risk (please see Current and Planned Work Activities).

However, ignition counts (in both low and potentially high consequence environments) are dependent on weather conditions and are highly variable. As a result, PG&E forecasts a range of 70 to 128 reportable ignitions to account for variability (corresponding to a rate of 2.83 – 5.18 ignitions per 1,000 circuit miles).

To establish the 1-year and 5-year targets, PG&E considered the following factors:

- Historical Data and Trends: PG&E has layered significant wildfire mitigation strategies over the past 8 years (like EPSS) and, outside of PG&E's own ignition record, there is no comparable historical data to help guide in target setting. PG&E is utilizing the previous 5-years worth of ignition actuals (2020 – 2024) to propose 2025 and 2029 target setting;
- Benchmarking: PG&E benchmarks extensively with other utilities in terms of wildfire risk and ignition reduction. Specifically, PG&E reviews utility ignition trends (where available) and analyzes the risk associated with large utility wildfires around the world;
- Regulatory Requirements: D.14-02-015;
- Attainable Within Known Resources/Work Plan: Yes;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The targets for this metric are suitable for Enhanced Oversight and Enforcement as they consider the potential for an increase in severe weather events due to climate change; and
- Other Qualitative Considerations: The target range takes consideration for some variability in weather.

3. 2025 Target

The 2025 target is 70-128 ignitions corresponding to a rate of 2.83 – 5.18 ignitions per 1,000 circuit miles). The upper end of this range represents the 5-year previous average (99 ignitions) with an additional full standard deviation (29 ignitions) for those same years to account for variability. The lower end of this range represents a full standard deviation reduction to that same average.

4. 2029 Target

The 2029 target is 70-128 ignitions corresponding to a rate of 2.83 – 5.18 ignitions per 1,000 circuit miles). The upper end of this range represents the 5-year previous average (99 ignitions) with an additional full standard deviation (29 ignitions) for those same years to account for variability. The lower end of this range represents a full standard deviation reduction to that same average. Additional time and maturity of PG&E's wildfire mitigations strategies will allow PG&E to reduce ignitions in R3+ conditions and forecast the effectiveness of the EPSS program to help inform long-term target ranges.

D. (3.14) Performance Against Target

1. Progress Towards the 1-Year Target

As demonstrated in Figure 3.13-5 below, PG&E ended this reporting period with 24 ignitions (corresponding to a rate of 0.97 ignitions per 1,000 circuit miles). We are expected to complete 2025 within our target of 70 – 128 ignitions.

2. Progress Towards the 5-Year Target

PG&E is on track to reach our 5-year goal. Outlined in Section E below, PG&E continues to deploy several programs outside of the EPSS program designed to improve the long-term performance of ignitions in R3+ conditions (where and when they matter) and further our goals of ending catastrophic wildfires associated with utility assets.

FIGURE 3.14-5
HISTORICAL PERFORMANCE (2015-Q2 2025) AND TARGETS (2025 AND 2029)

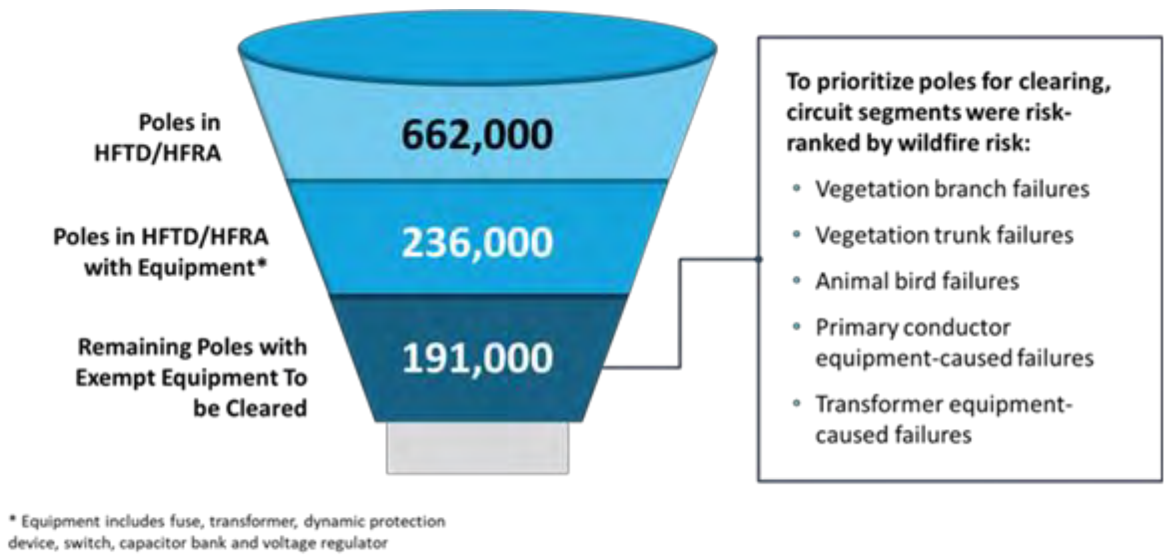
E. (3.14) Current and Planned Work Activities

PG&E can expect to see improved performance on this metric through continual execution of the Wildfire Mitigation Plan (WMP) and maturation of key wildfire mitigation strategies, including:

- Proactive Ignition Mitigation Taskforces: On July 11, 2024, we initiated the R3+ Taskforce to identify immediate actions to mitigate the rising ignition trend seen during an early July heat wave. In additional proactive mitigation taskforce was launched in 2025 to immediately mitigate additional ignition risk in 2025. Mitigations implemented for overhead distribution included pole clearing, expulsion fuse replacement, expedited completion of infrared tags and bird nest clearing tags, installation of Gridscope devices, and addition of AI-enabled wildfire cameras.

Pole clearing involves identifying and removing flammable material, brush, limbs, and foliage around electric poles and towers. As part of California Public Resources Code § 4292, we clear a 10-foot radius of vegetation around approximately 78,000 poles. As almost half of reportable ignitions in HFTD or HFRA in 2023 and 2024 originated within approximately 10 feet of the base of a pole, pole clearing was identified as a mitigation with significant potential to reduce the risk of ignitions starting at the base of the pole. An additional set of approximately 50,000 distribution poles with overhead equipment were cleared as part of the Task Force, prioritized using the funnel shown in the below figure.

FIGURE 3.14-6
R3+ PROACTIVE POLE CLEARING PRIORITIZATION



SMU expulsion Fuses (e-Fuses) have been observed to fail catastrophically. In some cases, the failure can cause an ignition. The primary mitigation for these e-Fuses is vegetation clearing at the base of the pole. However, the Task Force recommended replacing roughly 2,500 e-Fuses at 1,000 poles that could not easily be cleared of vegetation at the base of the pole.

Infrared tags result from a test that scans the distribution system looking for bad connections or equipment using infrared imaging. The Task Force recommended expediting the completion of 84 open infrared tags in HFTD and HFRA to resolve any identified faulty equipment prior to the remainder of the wildfire season.

Due to the observed increase in bird contact-related ignitions in July 2024, the Task Force recommended expediting 70 open bird nest tags on the distribution system to clear known bird’s nests in HFTD or HFRA.

The Task Force performed a review of EPSS ignition rates over the 2022, 2023, and the partial 2024 wildfire seasons based on delay times. The Task Force observed higher rates of outages becoming ignitions for delay times greater than 60ms and recommended additional investigation into shorter EPSS device delay times during periods of elevated ignition likelihood. Three circuits with devices with delay times greater than 60ms were selected to implement delay times on the circuits that were less than 60ms. This pilot is continuing in 2025 and may be expanded to additional circuits if successful.

Gridscope devices are pole-mounted sensors designed to detect fault conditions such as line breaks, pole tilt, wire-to-wire contact, or arcing. In addition, Gridscope can enable improved fault localization and identification to dispatch troubleshooters to the location of a fault rather than requiring them to patrol an entire circuit. Gridscope was piloted on a variety of EPSS-enabled circuit segments across the service territory prior to the initiation of the Task Force. Subsequently, the Task Force recommended additional Gridscope installations for a second set of circuit segments on four-wire circuits where traditional Downed Conductor Detection is not effective and other circuit segments with elevated wildfire risk based on vegetation contact, conductor failure, and bird contact. To date, we have approximately 10,000 Gridscope devices installed throughout the system. In 2025, we are deploying an additional 10,000 sensors and developing additional processes and procedures to enable integration with other sensors and dispatch tools that we currently use.

AI-enabled wildfire cameras can detect a wildfire and alert local agencies, which leads to quicker response and wildfire containment. The company reviewed the current viewshed across the service territory and developed a list of locations where the viewshed could be improved with the installation of additional wildfire cameras. To date, we have 643 wildfire cameras that cover the viewshed of over 90 percent of our territory. An additional 69 cameras are planned for installation in 2025.

- Maturation of the EPSS Program: In July 2021, to address this dynamic climate challenge, we implemented the EPSS Program on approximately 11,500 miles of distribution circuits, or 45 percent of the circuits in HFTD areas. With EPSS, we engineered changes to our electrical equipment settings so that if an object such as vegetation contacts a distribution line, power is automatically shut off within 1/10th of a second, reducing the potential for an ignition. EPSS enabled settings provide a layer of protection on days when the wind speeds are low. EPSS is especially important during hot dry summer days when there are low winds. Continued low relative humidity, low fuel moistures levels, and areas where the volume of dry vegetation is in close proximity to the distribution lines, increases the risk of an ignition becoming a large wildfire.

In 2022, we expanded the EPSS scope to all primary distribution conductor in High Fire Risk Area (HFRA) areas in our service territory, as well as select non HFRA areas. In concert with this expansion of the program, PG&E modified enablement criteria (improving risk reduction and reliability).

In 2023, PG&E implemented a DCD algorithm on recloser controllers to mitigate risk of low current fault conditions, also referred to as high-impedance faults.

In 2024, PG&E matured high-impedance fault protection by adjusting Sensitive Ground Fault (SGF) relay settings and piloting new technology to add DCD-like protection to the small number of circuit miles where we are not capable of implementing DCD. This work continues in 2025.

Please see Section 8.1.8.1.1, Protective Equipment and Device Settings in PG&E's 2023-2025 WMP for additional details.

- Public Safety Power Shut Off : PSPS is a wildfire mitigation strategy, first implemented in 2019, to reduce powerline ignitions during severe weather by proactively de-energizing powerlines (remove the risk of those powerlines causing an ignition) prior to forecasted wind events when humidity levels and fuel conditions are conducive to wildfires. PG&E's focus with the PSPS Program is to mitigate the risks associated with a catastrophic wildfire and to prioritize customer safety. In 2021, PG&E continued to make progress to its PSPS Program to mitigate wildfire risk, including updating meteorology models and scoping processes. In 2023, PG&E continued a multi-rear effort to install additional distribution sectionalizing devices, Fixed Power Solutions, and other mitigations targeted at reducing the risk of wildfire. In 2024, we updated our thresholds utilizing new and improved risk models.

Please see Section 9, PSPS, Including Directional Vision For PSPS in PG&E's 2023-2025 WMP for additional details.

- Grid Design and System Hardening: PG&E's broader grid design program covers several significant programs to reduce ignition risk, called out in detail in PG&E's 2023 WMP. The largest of these programs is the System Hardening Program which focuses on the mitigation of potential catastrophic wildfire risk caused by distribution overhead assets. In 2023, we rapidly expanded our system hardening efforts by:

- Completing 420 circuit miles of system hardening work which includes overhead system hardening, undergrounding and removal of overhead lines in HFTD or buffer zone areas;
- Completing at least 350 circuit miles of undergrounding work, including Butte County Rebuild efforts and other distribution system hardening work; and
- In 2024, PG&E completed ~250 miles of undergrounding.

As we look to 2025, PG&E is targeting 350 miles of undergrounding to be completed in 2025 as part of the 10,000 Mile Undergrounding Program. This system hardening work done at scale is expected to have a material impact on ignition reduction.

Please see Section 8.1.2, Grid Design and System Hardening Mitigations in PG&E's 2023-2025 WMP for additional details.

- VM: We restructured our VM Program based on a risk-informed approach. Recent data and analysis demonstrate that the Enhanced Vegetation Management (EVM) Program risk reduction is less than EPSS and additional Operational Mitigations. As a result, we transitioned the EVM Program to three new risk-informed VM programs.
  - Focused Tree Inspections: We developed specific areas of focus (referred to as Areas of Concern), primarily in the HFRA, where we will concentrate our efforts to inspect and address high-risk locations, such as those that have experienced higher volumes of vegetation damage during PSPS events, outages, and/or ignitions.
  - VM for Operational Mitigations: This program is intended to help reduce outages and potential ignitions using a risk informed, targeted plan to mitigate potential vegetation contacts based on historic vegetation caused outages on EPSS-enabled circuits. We will initially focus on mitigating potential vegetation contacts in circuit protection zones that have experienced vegetation caused outages. Scope of work will be developed by using EPSS and historical outage data and vegetation failure from the Wildfire Distribution Risk Model v3 risk model. EPSS-enabled devices vegetation outages extent of condition inspections may generate additional tree work.

– Tree Removal Inventory: This is a long-term program intended to systematically work down trees that were previously identified through EVM inspections. We will develop annual risk-ranked work plans and mitigate the highest risk-ranked areas first and will continue monitor the condition of these trees through our established inspection programs.

Please see Section 8.2.2, Vegetation Management, and Inspections in PG&E’s 2023–2025 WMP for additional details.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.15

NUMBER OF CPUC-REPORTABLE IGNITIONS IN HFTD AREAS

(TRANSMISSION)

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
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(TRANSMISSION)

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PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.15
NUMBER OF CPUC-REPORTABLE IGNITIONS IN HFTD AREAS (TRANSMISSION)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.15) Overview

1. Metric Definition

Safety and Operational Metrics (SOM) 3.15 – Number of California Public Utilities Commission (CPUC)-Reportable Ignitions in High Fire Threat District (HFTD) areas (Transmission) is defined as:

Number of CPUC-reportable ignitions involving overhead transmission circuits in HFTD Areas.

A CPUC-Reportable Ignition refers to a fire incident where the following three criteria are met: (1) Ignition is associated with Pacific Gas and Electric Company (PG&E or the Company) electrical assets, (2) something other than PG&E facilities burned, and (3) the resulting fire travelled more than one linear meter from the ignition point.[1]

For this SOM, reporting is specific to Tier 2 and Tier 3 HFTDs.

PG&E provides the CPUC with annual ignition data in the Fire Incident Data Collection Plan, to the Office of Energy Infrastructure and Safety quarterly via quarterly geographic information system, data reporting, in quarterly Wildfire Mitigation Plan (WMP) updates, and the Safety Performance Metrics Report.

2. Introduction of Metric

The number of CPUC-Reportable Ignitions in HFTDs provides one way to gauge the level of wildfire risk that customers and communities are exposed to from overhead transmission assets. PG&E's objective is to

1 Please CPUC Decision (D.) 14-02-015, issued February 5, 2014 for additional details.

minimize the number of CPUC-Reportable ignitions in the right locations during the right conditions that may trigger a catastrophic wildfire.

3. Audit Results

In the Audit Report, Metric 3.15 received a Metric Accuracy Finding of "None." There were no Other Findings for this metric.[2]

B. (3.15) Metric Performance

1. Historical Data (2015 – June 2025)

PG&E implemented the Fire Incident Data Collection Plan, in response to D.14-02-015, in June 2014 and our record, the Ignitions Tracker, includes all CPUC-Reportable ignitions from June 2014 to present. The 2014 data does not represent a complete year and is excluded in this analysis.

PG&E's overhead transmission circuits traverse approximately 5,400 miles of terrain in the HFTD areas where the overhead conductor is primarily bare wire, supported by structures consisting of poles and towers. The annual number of CPUC-Reportable ignitions is too low to detect any statistical pattern.

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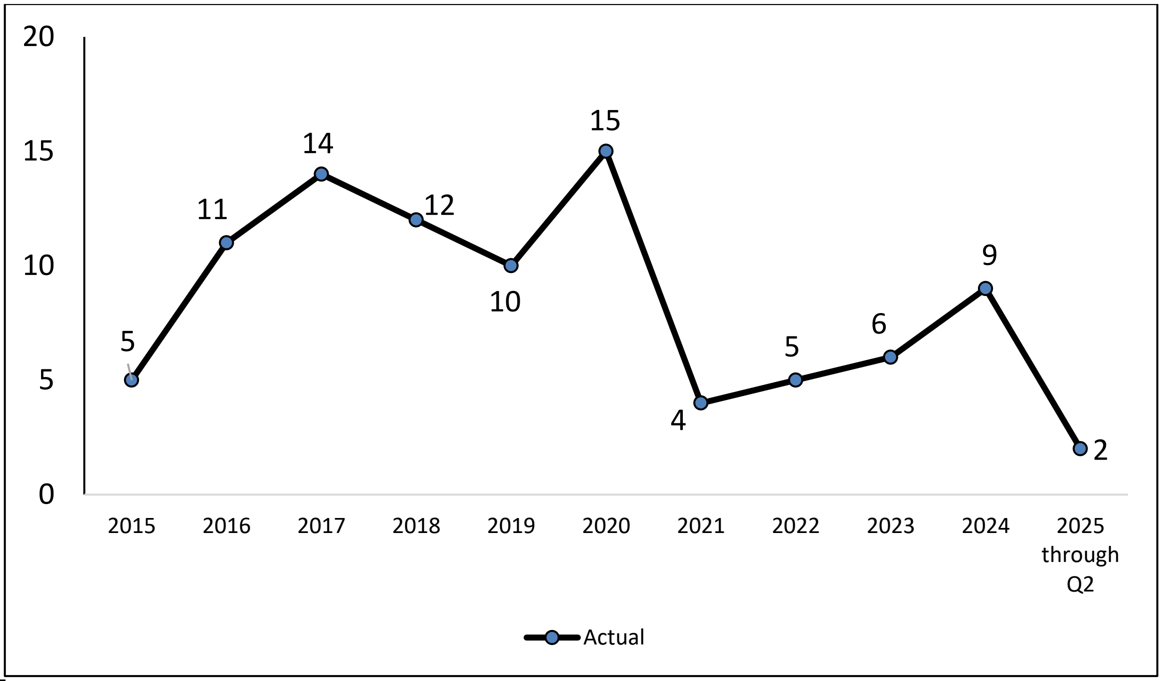
2 Audit Report, p. 8, Table 1-1.

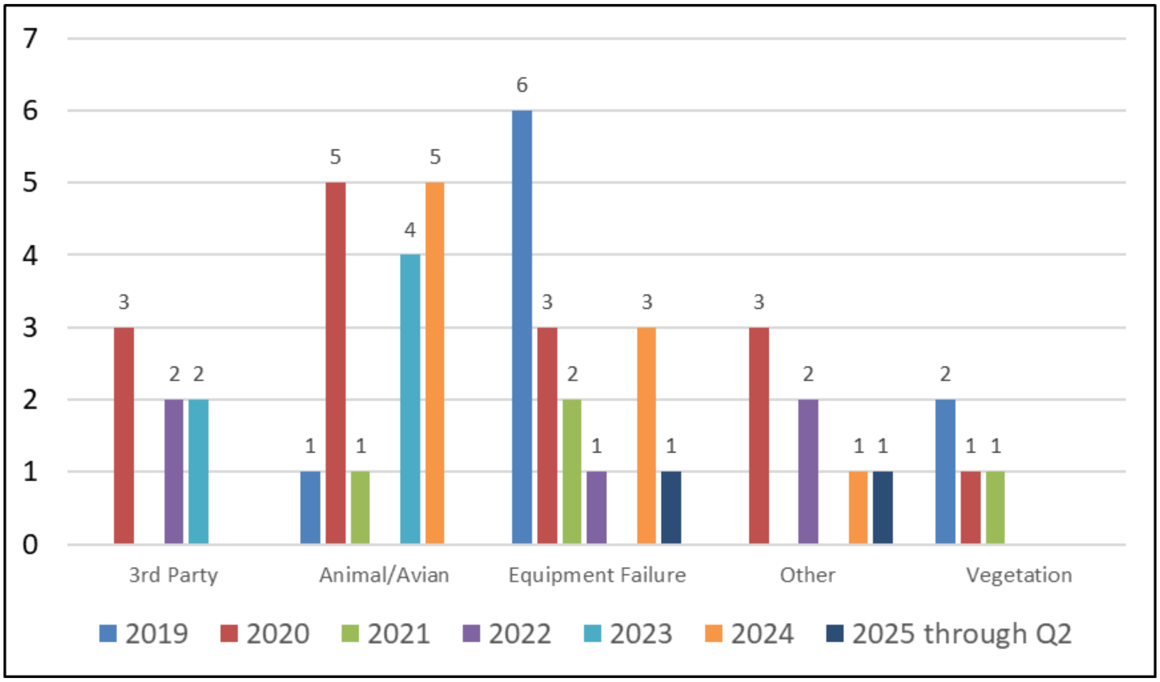
FIGURE 3.15-1
HISTORICAL PERFORMANCE (2015 – Q2 2025)



Note: As part of a Risk Assessment Improvement Plan item in PG&E's 2023 – 2025 WMP, PG&E reviewed historic ignitions data and reattributed certain historical events, resulting in slight changes in the count of ignitions in scope for this metric for historical years (some years increased while others decreased). In general, ignition counts represent a snapshot in time and are subject to change based on new data.

The main causes of CPUC-Reportable ignitions have been collected and classified. These fall into five broad categories: third-party contact, animal contact, equipment failure, vegetation contact, and other causes. The counts for 2019 through Q2 2025 are shown in the graph below (Figure 3.15-2).

FIGURE 3.15-2
HISTORIC (2019 – Q2 2025) PERFORMANCE BY SUSPECTED CAUSE



2. Data Collection Methodology

Data will be collected per PG&E's Fire Incident Data Collection Plan (Utility Standard/Procedure RISK-6306S/P). Results will be inclusive of unique HFTD CPUC-Reportable ignitions attributable to the transmission asset class with overhead construction types.

The following ignition events captured by PG&E's Fire Incident Data Collection Plan (Utility Standard/Procedure RISK-6306S/P) will be excluded for this metric:

- Duplicate events;
- Ignitions that do not meet CPUC reporting criteria;
- Ignition events outside of Tier 2 and Tier 3 HFTD;
- Distribution Ignitions; and
- Ignitions attributable to underground or pad mounted assets as these are not overhead assets. Ignitions caused by non-overhead assets in HFTD are rare and, as the fires are often contained to the asset, pose less of a wildfire risk.

3. Metric Performance for the Reporting Period

Historically, reportable transmission ignitions in HFTD are low in volume with variability year-to-year, which complicates the detection of significant trends. PG&E observed two CPUC-reportable ignitions on overhead transmission assets through Q2 2025; the official cause of one ignition is unknown, however PG&E suspects it to have been caused by bird guano on an insulator (animal/avian cause), and one is equipment failure.

C. (3.15) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

PG&E proposes no changes to the 1 and 5-year targets for this period. PG&E set the 2025 and 2029 upper limit of the target range to account for the previous five years of actual results and variability driven by weather, and external factors like seasonal bird migration.

2. Target Methodology

To establish the 1-Year and 5-Year targets, PG&E considered the following factors:

- Historical Data and Trends: PG&E has layered significant wildfire mitigation strategies over the past eight years and, outside of PG&E's own ignition record, to help guide in target setting. PG&E is utilizing the previous 5-year worth of ignition actuals (2020 – 2024) to set 2025 and 2029 target setting;
- Benchmarking: PG&E benchmarks extensively with other utilities in terms of wildfire risk and ignition reduction. Specifically, PG&E reviews utility ignition trends (where available) and analyzes the risk associated large utility wildfires around the world;
- Regulatory Requirements: CPUC D.14-02-015;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The targets for this metric are suitable for Enhanced Oversight and Enforcement as they consider the potential for an increase in severe weather events due to climate change; and
- Other Qualitative Considerations: The target range takes consideration for some variability in weather.

3. 2025 Target

PG&E's target for 2025 is 4-12. The upper and bottom ends of this range represents the 5-year previous average (eight ignitions) subtracting/adding a full standard deviation (four ignitions) for those same years to account for variability.

4. 2029 Target

PG&E's target for 2029 is 4-12. The upper and bottom ends of this range represents the 5-year previous average (8 ignitions) subtracting/adding a full standard deviation (4 ignitions) for those same years to account for variability. The upper end of the range is 12 in 2025 and 2029 because the volume of transmission ignitions is low, while variability year-to-year remains high.

D. (3.15) Performance Against Target

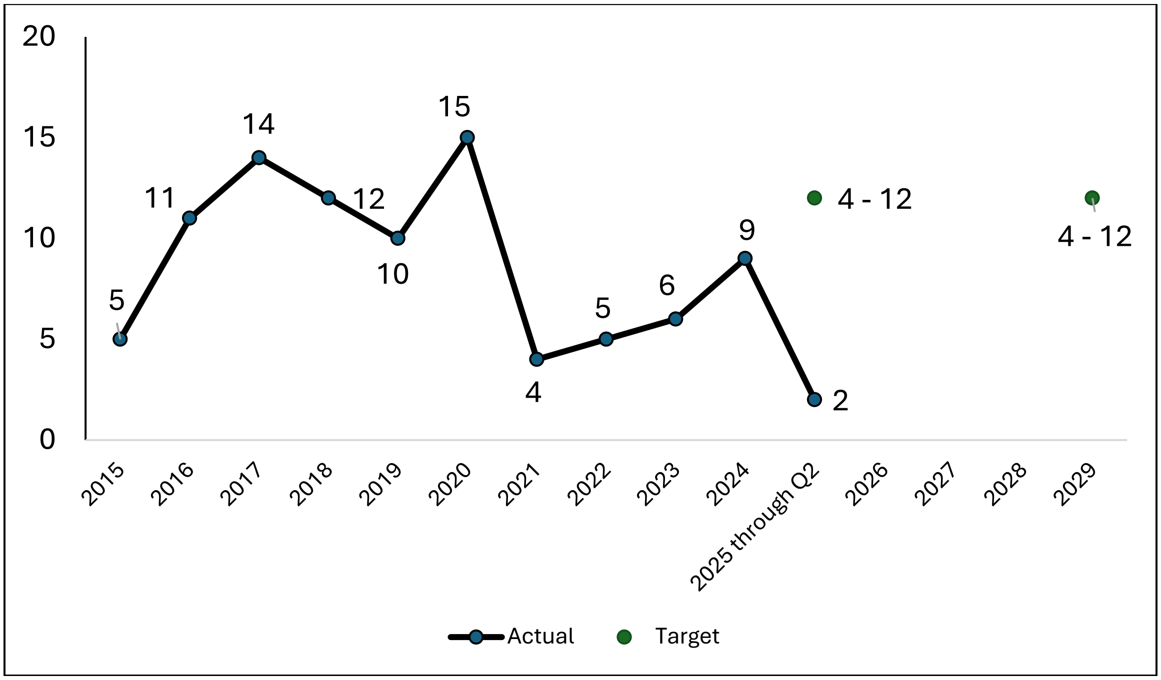
1. Progress Towards the 1-Year Target

As demonstrated in Figure 3.15-3 below, PG&E observed two CPUC-reportable ignitions on overhead transmission assets through Q2 2025, within our 2025 target range of 4 – 12 ignitions.

2. Progress Towards the 5-Year Target

As discussed in Section E below, PG&E is continuing to deploy several programs to keep metric performance within the Company's target range. PG&E expects no deviation from delivering the 2029 goal for this metric.

FIGURE 3.15-3
HISTORICAL PERFORMANCE (2015 – Q2 2025) AND TARGETS (2025 AND 2029)



Note: As part of a Risk Assessment Improvement Plan item in PG&E's 2023 – 2025 WMP, PG&E reviewed historic ignitions data and reattributed certain historical events, resulting in slight changes in the count of ignitions in scope for this metric for historical years (some years increased while others decreased). In general, ignition counts represent a snapshot in time and are subject to change based on new data.

E. (3.15) Current and Planned Work Activities

Through continual execution of its WMP, PG&E has taken action to reduce ignition risk associated with its transmission system, including:

- Utility Defensible Space Program/Proactive Support Structure Clearing: In 2023, PG&E expanded on Defensible Space Requirements in Public Resources Code Section 4292. Defensible Space is defined by three primary zones of clearance whereas in 2022 there were two zones. Starting in 2023 the first zone (0-5 feet (ft.)) from energized equipment or building is referred to as Zone 0 or the "Ember – Resistant Zone" and is intended to be void of any combustibles. The second zone (5-30 ft.) surrounding energized equipment and building is called the "Clean Zone" and in most cases (with minimal exceptions) is clear of trees and most vegetation. The third and final zone of clearance (30-100 ft.) is the "Reduced Fuel Zone" where vegetation is permitted if it is reduced or thinned and maintained regularly and within the requirements listed within PG&E's hardening procedures.

  - Approximately 2,700 support structures were completed through this program in 2023 and 2024; and
  - PG&E is targeting an additional 651 support structures in 2025 through the UDS program.
  - In addition to the 2025 UDS scope, PG&E is executing support structure clearing and utility defensible space projects associated with approximately 4,000 high-risk support structures in HFTD/High Fire Risk Area (HFRA). As 80 percent of PG&E's transmission-caused ignitions in HFTD and HFRA occur within 30 feet of the base of the structure (1), this effort is critical in reducing significant wildfire risk in the locations where wildfire risk and consequence are highest.

Please see Section 8.2.3.5, Substation Defensible Space (Mitigation) in PG&E's 2023-2025 WMP for additional details.

- Conductor Replacement and Removal: In 2021, PG&E completed 93.8 miles of conductor replacements and 10 miles of conductor removals. All this work took place on lines traversing HFTD areas. In 2022, PG&E removed or replaced 32 circuit miles of conductor in HFTD or HFRA. In 2023, PG&E removed or replaced 43 circuit miles of conductor in HFTD or HFRA. An additional 5 miles are planned through 2025.

Please see Section 8.1.2.5.1, Traditional Overhead Hardening – Transmission Conductor in PG&E's 2023-2025 WMP for additional details.

- Conductor Splice Shunts: A conductor splice is a potential point of failure within a conductor span, due to factors such as corrosion, moisture intrusion, vibration, and workmanship variability. To reduce the risk of failure, PG&E had initiated a program to install a shunt splice on top of the existing splices on This installation eliminates the splice as a single point of failure, as a failure of the original splice would not result in down conductor. Lines prioritized for this program are based on higher risk splice and wildfire consequence. In 2023, 20 transmission lines had splice shunts installed. In 2024, 22 transmission lines had splice shunts installed. An additional 25 lines are planned through 2025.

Please see Section 8.1.2.5.1, Traditional Overhead Hardening – Transmission Conductor in PG&E's 2023-2025 WMP for additional details.

- Conductor Segment Replacements: Another program has been initiated to replace targeted conductor segments within a line. A transmission line may consist of multiple conductor types, including spans of higher-risk segments such as small-sized conductors. This program reduces risk for lines where the conductor segments are may be at higher risk, but the supporting structures are generally in good condition and there is no expected additional electrical capacity need to increase the conductor size. PG&E plans to complete segment replacements on two lines in HFTD/HFRA in 2025.

  Please see Section 8.1.2.5.1, Traditional Overhead Hardening – Transmission Conductor in PG&E's 2023-2025 WMP for additional details.

- Proactive Animal Abatement: Given that avian-caused ignitions are the top driver in recent years, PG&E is exploring two specific mitigations associated with reducing risk of avian related ignitions:
  - PG&E has designed dielectric covers to cover a portion of steel lattice towers where we have observed faults caused by avian contact. PG&E is committing to installing these devices at 22 towers in 2025 and conducting a feasibility study to inform future programs as part of a WMP initiative. Please see Qualitative commitment GH-13 Section 8.2.12 and 8.2.12.2 Other Technologies and Systems not Listed Above – Transmission in PG&E's 2026 2028 WMP for additional details.
  - Executing an annual program to remove bird nests after nesting season.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.16

PERCENTAGE OF CPUC-REPORTABLE IGNITIONS IN

HFTD AREAS

(TRANSMISSION)

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.16
PERCENTAGE OF CPUC-REPORTABLE IGNITIONS IN
HFTD AREAS
(TRANSMISSION)

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PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.16
PERCENTAGE OF CPUC-REPORTABLE IGNITIONS IN HFTD AREAS (TRANSMISSION)

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (3.16) Overview

1. Metric Definition

Safety and Operational Metrics (SOM) 3.16 – percentage of California Public Utilities Commission (CPUC)-Reportable Ignitions in High Fire Threat District (HFTD) Areas (Transmission) is defined as:

The number of CPUC-reportable ignitions involving overhead transmission circuits in HFTD divided by circuit miles of overhead transmission lines in HFTD multiplied by 1,000 miles (ignitions per 1,000 HFTD circuit mile).

A CPUC-reportable ignition refers to a fire incident where the following three criteria are met: (1) Ignition is associated with Pacific Gas and Electric Company (PG&E) electrical assets, (2) something other than PG&E facilities burned, and (3) the resulting fire travelled more than one linear meter from the ignition point.[1]

For this SOM, reporting is specific to Tier 2 and Tier 3 HFTDs.

PG&E provides the CPUC with annual ignition data in the Fire Incident Data Collection Plan, to the Office of Energy Infrastructure and Safety quarterly via quarterly GIS data reporting, in quarterly Wildfire Mitigation Plan (WMP) updates, and the Safety Performance Metrics Report.

2. Introduction of Metric

The number of CPUC-reportable ignitions in HFTDs, normalized by circuit mileage, provides one way to gauge the level of wildfire risk that

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[1] Please see CPUC Decision (D.) 14-02-015, issued February 5, 2014 for additional details.

customers and communities are exposed to from overhead transmission assets. PG&E's objective is to minimize the number of CPUC-reportable ignitions in the right locations during the right conditions that may trigger a catastrophic wildfire.

3. Audit Results

In the Audit Report, Metric 3.16 received a Metric Accuracy Finding of "None." The Other Findings for this metric were "Line miles were inconsistent amongst reports and data sources."[2] The findings have been resolved. We are coordinating to ensure accuracy amongst reports and data sources going forward.

B. (3.16) Metric Performance

1. Historical Data (2015-June 2025)

PG&E implemented the Fire Incident Data Collection Plan, in response to CPUC D.14-02-015, in June 2014 and our record, the Ignitions Tracker, includes all CPUC-reportable ignitions from June 2014 to present. The 2014 data does not represent a complete year and is excluded in this analysis.

PG&E's overhead transmission circuits traverse approximately 5,400 miles of terrain in the HFTD areas where the overhead conductor is primarily bare wire, supported by structures consisting of poles and towers. The annual number of CPUC-reportable ignitions is too low and too variable to detect any statistical pattern.

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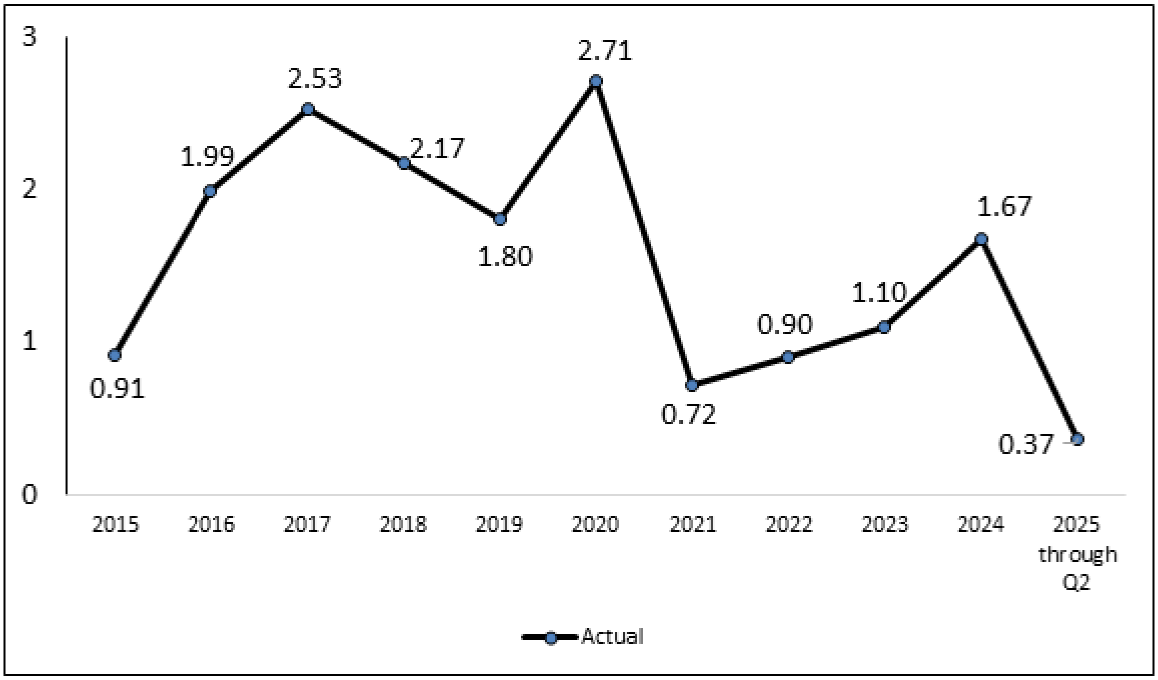
2 Audit Report, p. 8, Table 1-1.

FIGURE 3.16-1
HISTORICAL PERFORMANCE
(2015 – Q2 2025)



Note: As part of a Risk Assessment Improvement Plan item in PG&E's 2023-2025 WMP, PG&E reviewed historic ignitions data and reattributed certain historical events, resulting in slight changes in the count of ignitions in scope for this metric for historical years (some years increased while others decreased). In general, ignition counts represent a snapshot in time and are subject to change based on new data.

2. Data Collection Methodology

Data will be collected per PG&E's Fire Incident Data Collection Plan (Utility Standard/Procedure RISK-6306S/P). Results will be inclusive of unique HFTD CPUC-reportable ignitions attributable to the transmission asset class with overhead construction types.

The following ignition events captured by PG&E's Fire Incident Data Collection Plan (Utility Standard/Procedure RISK-6306S/P) will be excluded for this metric:

- Duplicate events;
- Ignitions that do not meet CPUC reporting criteria;
- Ignition events outside of Tier 2 and Tier 3 HFTD;
- Distribution Ignitions; and
- Ignitions attributable to underground or pad mounted assets, as these are not overhead assets. Ignitions caused by non-overhead assets in

HFTD are rare and, as the fires are often contained to the asset, pose less of a wildfire risk.

The circuit mileage utilized to calculate the 2015-2022 performance of this metric originates from PG&E's Electrical Asset Data Reports, refreshed December 2022. The 2023-24 performance and targets are based on an updated sum of overhead circuit mileage, refreshed in 2023.

3. Metric Performance for the Reporting Period

Historically, reportable transmission ignitions in HFTD are low in volume with variability year-to-year, which complicates the detection of significant trends. PG&E observed two CPUC reportable ignitions on overhead transmission assets through Q2 2025 (corresponding to a rate of 0.37 ignitions per 1,000 circuit miles); the official cause of one ignition is unknown, however PG&E suspects it to have been caused by bird guano on an insulator (animal/avian cause), and one is equipment failure.

C. (3.16) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

PG&E proposes no changes to the 1 and 5-year targets for this period. PG&E set the 2025 and 2029 upper limit of the target range to account for the previous 5 years of actual results and variability driven by weather, and external factors like seasonal bird migration.

2. Target Methodology

To establish the 1-Year and 5-Year targets, PG&E considered the following factors:

- Historical Data and Trends: PG&E has layered significant wildfire mitigation strategies over the past 8 years and, outside of PG&E's own ignition record, to help guide in target setting. PG&E is utilizing the previous 5-years worth of ignition actuals (2020-2024) to set 2025 and 2029 target setting;
- Benchmarking: PG&E benchmarks extensively with other utilities in terms of wildfire risk and ignition reduction. Specifically, PG&E reviews utility ignition trends (where available) and analyzes the risk associated large utility wildfires around the world;
- Regulatory Requirements: CPUC D.14-02-015;

- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The targets for this metric are suitable for Enhanced Oversight and Enforcement as they consider the potential for an increase in severe weather events due to climate change; and
- Other Qualitative Considerations: The target range takes consideration for some variability in weather.

3. 2025 Target

PG&E's target for 2025 is 4-12 (corresponding to a rate of 0.74- 2.23 ignitions per 1,000 circuit miles). The upper and bottom ends of this range represents the 5-year previous average (8 ignitions) subtracting/adding a full standard deviation (4 ignitions) for those same years to account for variability.

4. 2029 Target

PG&E's target for 2029 is 4-12 (corresponding to a rate of 0.74 – 2.23 ignitions per 1,000 circuit miles). The upper and bottom ends of this range represents the 5-year previous average (8 ignitions) subtracting/adding a full standard deviation (4 ignitions) for those same years to account for variability. The upper end of the range stays at 12 in 2025 and 2029 because the volume of transmission ignitions is low, while variability year to year remains high.

D. (3.16) Performance Against Target

1. Progress Towards the 1-Year Target

As demonstrated in Figure 3.16-2 below, PG&E observed two CPUC-reportable ignitions on overhead transmission assets through Q2 2025 (corresponding to a rate of 0.37 ignitions per 1,000 circuit miles), within our 2025 target range of 4 – 12 ignitions (corresponding to a rate of 0.74 – 2.23 ignitions per 1,000 circuit miles).

2. Progress Towards the 5-Year Target

As discussed in Section E below, PG&E is continuing to deploy several programs to keep metric performance within the Company's target range. PG&E expects no deviation from delivering the 2029 goal for this metric.

FIGURE 3.16-2
HISTORICAL PERFORMANCE (2015 – Q2 2025) AND
TARGETS (2025 AND 2029)

Note: As part of a Risk Assessment Improvement Plan item in PG&E's 2023-2025 WMP, PG&E reviewed historic ignitions data and reattributed certain historical events, resulting in slight changes in the count of ignitions in scope for this metric for historical years (some years increased while others decreased). In general, ignition counts represent a snapshot in time and are subject to change based on new data.

E. (3.16) Current and Planned Work Activities

Through continual execution of its WMP, PG&E has taken action to reduce ignition risk associated with its transmission system, including:

- Utility Defensible Space Program/ Proactive Support Structure Clearing: In 2023, PG&E expanded on Defensible Space Requirements in Public Resources Code Section 4292. Defensible Space is defined by three primary zones of clearance whereas in 2022 there were two zones. Starting in 2023 the first zone (0-5 feet (ft.)) from energized equipment or building is referred to as Zone 0 or the "Ember – Resistant Zone" and is intended to be void of any combustibles. The second zone (5-30 ft.) surrounding energized equipment and building is called the "Clean Zone" and in most cases (with minimal exceptions) is clear of trees and most vegetation. The third and final zone of clearance (30-100 ft.) is the "Reduced Fuel Zone" where vegetation is permitted if it is reduced or thinned and maintained regularly and within the requirements listed within PG&E's hardening procedures.

- Approximately 2,700 support structures were completed through this program in 2023 and 2024;
- PG&E is targeting an additional 651 support structures in 2025 through the UDS program; and
- In addition to the 2025 UDS scope, PG&E is executing support structure clearing and utility defensible space projects associated with approximately 4,000 high-risk support structures in High Fire Threat District/High Fire Risk Area (HFRA) As 80 percent of PG&E's transmission-caused ignitions in High Fire Threat Districts and HFRAs occur within 30 feet of the base of the structure (1), this effort is critical in reducing significant wildfire risk in the locations where wildfire risk and consequence are highest.

Please see Section 8.2.3.5, Substation Defensible Space (Mitigation) in PG&E's 2023-2025 WMP for additional details.

- Conductor Replacement and Removal: In 2021, PG&E completed 93.8 miles of conductor replacements and 10 miles of conductor removals. All this work took place on lines traversing HFTD areas. In 2022, PG&E removed or replaced 32 circuit miles of conductor in HFTD or HFRA. In 2023, PG&E removed or replaced 43 circuit miles of conductor in HFTD or HFRA. An additional 5 miles are planned through 2025.

  Please see Section 8.1.2.5.1, Traditional Overhead Hardening – Transmission Conductor in PG&E's 2023-2025 WMP for additional details.

- Conductor Splice Shunts: A conductor splice is a potential point of failure within a conductor span, due to factors such as corrosion, moisture intrusion, vibration, and workmanship variability. To reduce the risk of failure, PG&E had initiated a program to install a shunt splice on top of the existing splices on This installation eliminates the splice as a single point of failure, as a failure of the original splice would not result in down conductor. Lines prioritized for this program are based on higher risk splice and wildfire consequence. In 2023, 20 transmission lines had splice shunts installed. In 2024, 22 transmission lines had splice shunts installed. An additional 25 lines are planned through 2025.

  Please see Section 8.1.2.5.1, Traditional Overhead Hardening – Transmission Conductor in PG&E's 2023-2025 WMP for additional details.

- Conductor Segment Replacements: Another program has been initiated to replace targeted conductor segments within a line. A transmission line may consist of multiple conductor types, including spans of higher-risk segments such as small-sized conductors. This program reduces risk for lines where the conductor segments are may be at higher risk, but the supporting structures are generally in good condition and there is no expected additional electrical capacity need to increase the conductor size. PG&E plans to complete segment replacements on 2 lines in HFTD/HFRA in 2025.

  Please see Section 8.1.2.5.1, Traditional Overhead Hardening – Transmission Conductor in PG&E's 2023-2025 WMP for additional details.
- Proactive Animal Abatement: Given that avian-caused ignitions are the top driver in recent years, PG&E is exploring two specific mitigations associated with reducing risk of avian related ignitions:
  - PG&E has designed dielectric covers to cover a portion of steel lattice towers where we have observed faults caused by avian contact. PG&E is committing to installing these devices at 22 towers in 2025 and conducting a feasibility study to inform future programs as part of a WMP initiative. Please see Qualitative commitment GH-13 Section 8.2.12 and 8.2.12.2 Other Technologies and Systems not Listed Above – Transmission in PG&E's 2026 2028 WMP for additional details; and
  - Executing an annual program to remove bird nests after nesting season.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 4.1

NUMBER OF GAS DIG-INS PER 1,000 UNDERGROUND SERVICE ALERT (USA) TICKETS ON TRANSMISSION AND DISTRIBUTION PIPELINES

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 4.1
NUMBER OF GAS DIG-INS PER 1,000 UNDERGROUND
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SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 4.1
NUMBER OF GAS DIG-INS PER 1,000 UNDERGROUND SERVICE ALERT (USA) TICKETS ON TRANSMISSION AND DISTRIBUTION PIPELINES

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (4.1) Overview

1. Metric Definition

Safety and Operational Metric 4.1 – Number of Gas Dig-Ins per 1,000 tickets on Transmission and Distribution Pipelines is defined as:

The number of gas dig-ins per 1,000 Underground Service Alert (USA) tickets received for gas. A gas dig-in refers to damage (impact or exposure) which occurs during excavation activities and results in a repair or replacement of an underground gas facility. Excludes fiber and electric tickets. Also excludes tickets originated by the Utility itself or by utility contractors.

2. Introduction of Metric

Reducing gas dig-ins increases public safety and improves reliability. It is therefore important to take reasonable steps to reduce this risk because gas dig-ins represent a potential risk to people, property, and the environment.

If ignited, gas from a dig-in could produce a fire or explosion, either of which could result property damage, injury or even death. Release of gas from a dig-in also produces a possible health hazard from inhalation of natural gas. Finally, dig-ins typically produce a disruption or loss of service to one or more customers.

For all these reasons, fewer dig-ins reduces risk to public safety and minimizes interruption to the gas business and customers.

3. Audit Results

In the Audit Report, Metric 4.1 received a Metric Accuracy Finding of "None." There were no Other Findings for this metric.[1]

B. (4.1) Metric Performance

1. Historical Data (2018 – June 2025)

For this metric, Pacific Gas and Electric Company (PG&E or the Company or the Utility) has seven years of historic data available, which includes 2018-June 2025. The past seven years were used for analysis in target setting. Over the historical reporting period, performance improved as demonstrated by both an overall upward trend in USA tickets and a downward trend in gas dig-ins.

FIGURE 4.1-1
THIRD-PARTY TICKETS AND TOTAL DIG-IN COUNTS
2018 – JUNE 2025

	3rd Party Ticket Counts									Dig-In Count							
Month	2018	2019	2020	2021	2022	2023	2024	2025	Month	2018	2019	2020	2021	2022	2023	2024	2025
January	66,605	66,900	74,736	69,544	83,536	60,314	76,150	85,610	January	100	89	93	118	118	79	77	77
February	62,387	58,586	70,016	74,323	80,127	61,733	72,219	76,831	February	131	78	119	116	106	79	65	58
March	66,538	74,563	69,991	95,177	93,432	68,744	78,603	83,710	March	103	103	98	126	143	66	82	69
April	71,514	85,215	67,071	93,335	83,657	73,186	86,984	93,180	April	147	140	117	147	120	111	110	95
May	75,794	86,339	71,786	87,432	87,005	83,866	86,518	90,578	May	209	140	128	139	150	123	114	128
June	69,824	81,989	80,614	93,008	88,319	80,983	78,908	86,917	June	176	176	170	183	149	121	114	122
July	68,927	92,787	80,926	84,316	81,346	75,831	87,875		July	190	196	201	170	145	110	141	
August	74,158	89,869	76,521	87,507	94,628	85,879	89,998		August	186	200	182	175	156	135	152	
September	64,678	84,840	79,684	84,126	86,949	79,082	84,797		September	173	167	178	163	124	139	138	
October	77,779	91,022	81,680	82,106	87,461	84,875	93,954		October	179	191	155	135	131	117	129	
November	64,861	72,476	72,089	82,859	79,547	76,765	73,354		November	139	149	131	101	96	119	91	
December	56,219	64,452	73,995	71,744	62,951	63,816	76,550		December	110	87	126	64	45	73	68	
Total	819,284	949,038	899,109	1,005,477	1,008,958	895,074	985,910	516,826	Total	1,843	1,716	1,698	1,637	1,483	1,272	1,281	549

2. Data Collection Methodology

The data used for this metric reporting is maintained in two files. Together, these databases identify the number of dig-ins and the 811 tickets, respectively. To ensure accuracy of the Master Dig-In File data, three data sources are reviewed:

1) The repair data file recorded in SAP- (Obtained using Business Objects GCM058 Quarterly GQI Extract Report);
2) The Event Management (EM) Tool obtained from Gas Dispatch, data file; and

[1] Audit Report, p. 8, Table 1-1.

3) The Dig-In Reduction Teams (DiRT) Pronto download file, obtained from the DiRT team data download report.

Events that meet the definition of dig-in are recorded as a ratio of total dig-ins (count) divided by the third-party USA tickets (count) multiplied by 1,000. This metric does not include tickets originated by the Utility itself or by utility contractors.

This metric also does not include PG&E dig-ins to third parties (e.g., sewer, water, telecommunications). Dig-ins are reported in real-time, so they should be captured for the reporting period. However, in the event dig-ins are reported after the reporting cycle is closed, the dig-in would be captured in the next reporting cycle (i.e., the next quarter of the current year or the first quarter of the next year). Electric and Fiber dig-ins are also excluded from the dig-in count. Also excluded from the dig-in count are the following (since damages are not from excavation activity):

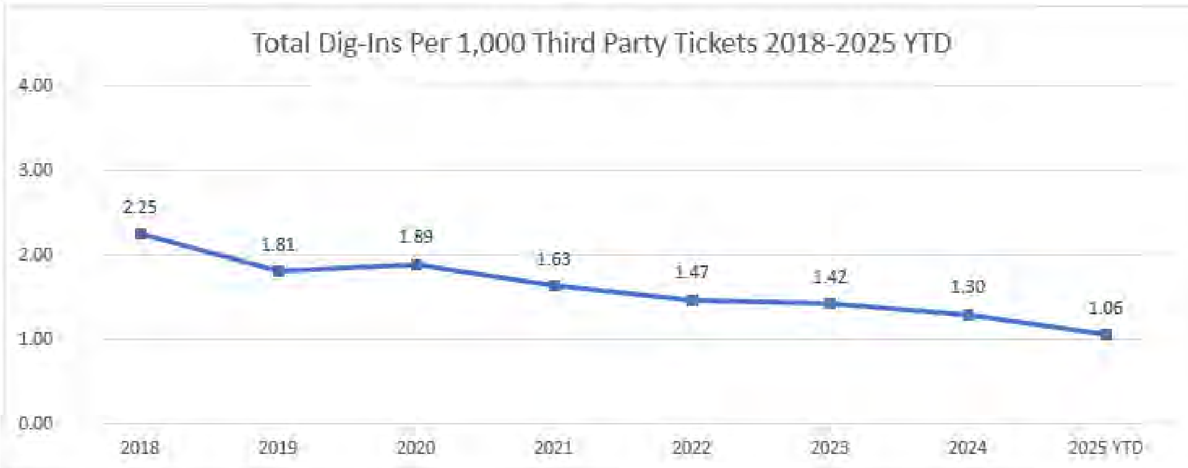
- Damages to above-ground infrastructure, such as meters and risers, or overbuilds;
- Pre-existing damages (e.g., due to corrosion or old wrap);
- Any intentional damage to a pipeline (e.g., drilling or cutting);
- Damage caused by driving over a covered facility (heavy vehicles damage gas pipe, non-excavation);
- Damage to abandoned facilities;
- Damage due to materials failure (e.g., Aldyl-A pipe);
- Damage caused to gas or electric lines by trench collapse or soldering work; and
- Facility has been fully exposed, and damage is not as a result of excavation activity (as defined by California Government Code 4216 (G)) (e.g., cutting tree roots, object/person contact to exposed gas line;
- Damage deemed unavoidable (e.g. tree root embedded gas line).

3. Metric Performance for the Reporting Period

There has been an overall downward trend in the number of dig-ins per 1,000 third-party USA tickets. PG&E attributes the reduction to current and planned Damage Prevention activities. Overall, PG&E has worked to increase knowledge of the requirement to call 811 before digging through

Public Awareness Campaigns and by providing training and education to contractors. PG&E continues to show an improvement in its dig-in ratio.

FIGURE 4.1-2
TOTAL DIG-INS PER 1,000 THIRD-PARTY TICKETS
2018 – JUNE 2025



C. (4.1) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

Updated targets are provided below.

2. Target Methodology

To establish the 1-year and 5-year targets, PG&E considered the following factors:

- Historical Data and Trends: Comparable data is available starting in 2018. Performance has been consistent with a downward trend from 2018-June 2025;
- Benchmarking: Although this metric is not benchmarkable as defined (benchmarkable metrics include total tickets rather than only a subset of tickets), benchmark data was used and derived as proxy guideposts to understand PG&E performance for third-party tickets to inform target setting. The target is set at a level consistent with strong performance.
- Regulatory Requirements: None;
- Attainable Within Known Resources/Work Plan: Yes;
- Appropriate/Sustainable Indicators for Enhanced Oversight Enforcement: Yes, performance at or below the set target is a

sustainable assumption for maintaining metric performance, plus room for non-significant variability; and

- Other Qualitative Considerations: None.

3. 2025 Target

The 2025 target is to maintain metric performance at or better than a rate of 1.94 based on the factors described above. This improvement is based upon the Damage Prevention Organization's Dig-in Reduction Program. This target represents an appropriate indicator light to signal a review of potential performance issues. Target should not be interpreted as intention to worsen performance.

4. 2029 Target

The 2029 target is to maintain performance better than a rate of 1.90 based on the factors described above. Annual targets should continue to be informed by available benchmarking data.

D. (4.1) Performance Against Target

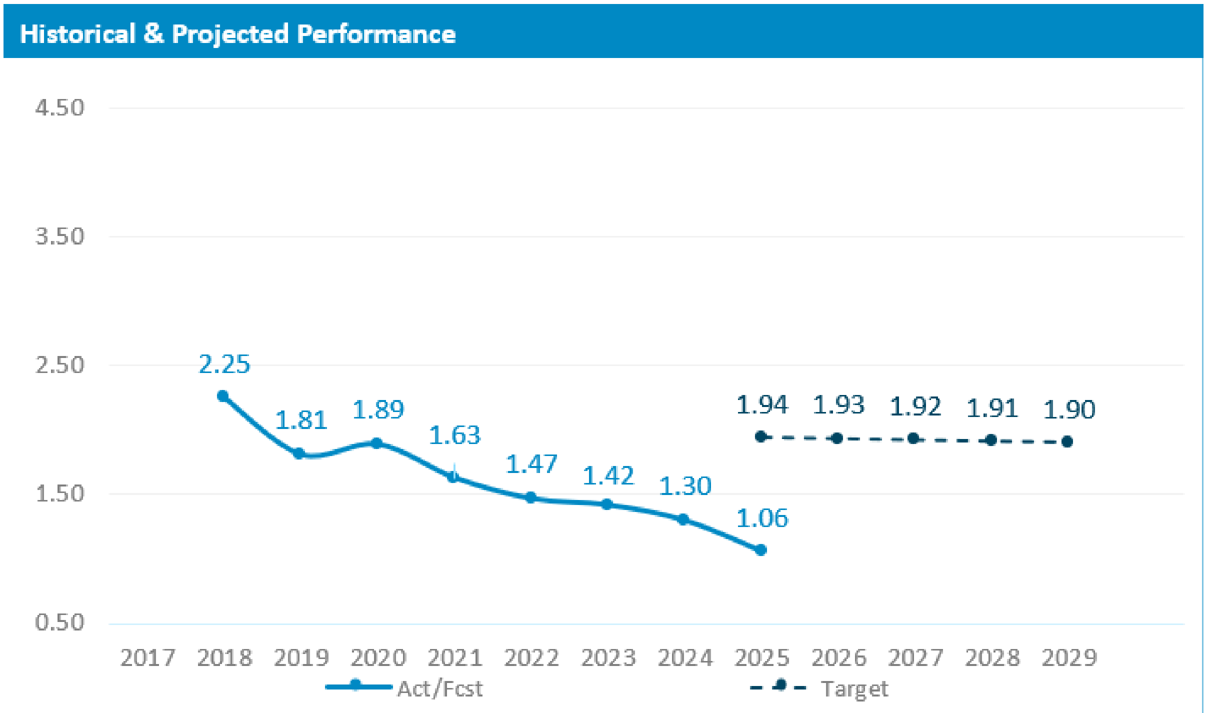
1. Maintaining Performance Against the 1-Year Target

As demonstrated in Figure 4.1-3, PG&E saw a 1.06 Gas Dig-In rate in 2025 YTD (Jan. – Jun.), which is better than the Company's 1-year target of 1.94 and remains consistent with the Company's objective of maintaining first quartile performance.

2. Maintaining Performance Against the 5-Year Target

As discussed in Section E, PG&E continues to use the Damage Prevention and DiRT programs to maintain performance in its efforts toward the Company's 5-year target.

FIGURE 4.1-3
TOTAL DIG-INS PER 1,000 THIRD-PARTY TICKETS
2018 – JUNE 2025 AND
TARGETS 2025 THROUGH 2029



1yr Target (2025)	5yr Target (2029)
≤ 1.94	≤ 1.90

E. (4.1) Current and Planned Work Activities

PG&E’s Damage Prevention team is responsible for the overall management of PG&E’s Damage Prevention Program, by managing the risks associated with excavations around PG&E’s facilities and conducting investigations. As an additional control to manage the Damage Prevention Program, PG&E has its Dig-In Reduction Team (DiRT). DiRT consists of 23 people (2 Supervisors, 15 PG&E Employees and 6 Contractors) deployed systemwide to investigate dig-ins. Team members work closely with various local PG&E operations personnel and respond to referrals from those employees when they observe excavations potentially not in compliance with the requirements of California Government Code Section 4216. DiRT personnel also assist the Ground Patrol team when they respond to immediate threats identified in the air by the Aerial Patrol team and other PG&E groups, in order to intervene in unsafe digging activities by third parties and follow-up to educate excavators as necessary.

PG&E's Damage Prevention activities include educational outreach activities for professional excavators, local public officials, emergency responders, and the general public who live and work within PG&E's service territory. The program communicates safe excavation practices, required actions prior to excavating near underground pipelines, availability of pipeline location information, and other gas safety information through a variety of methods throughout the year. These efforts are aimed at increasing public awareness about the importance of utilizing the 811 Program before an excavation project is started, understanding the markings that have been placed, and following safe excavation practices after subsurface installations have been marked. Specific activities aimed at preventing dig-ins include:

- Updating the Locate and Mark Field Guide and procedures to provide clear instruction around critical processes for locating underground assets, including troubleshooting of difficult to locate facilities;
- PG&E participates in the Common Ground Alliance (CGA) – Damage Prevention Institute (DPI). PG&E began this program that is now run by a third-party and available to utilities and excavators across the nation. The program sets safety criteria that PG&E contractors are required to meet to be eligible to do work on behalf of the Utility. The CGA is an internationally-recognized program, with companies in Canada adopting and implementing its certification requirements. The DPI is a way that PG&E is making its own communities safer, and bringing best safety practices to the industry;
- An 811 Ambassador program, which utilizes all PG&E employees to properly identify unsafe excavation activities where employees learn how to identify excavation-related delineations and utility operator markings; and
- In 2023 PG&E re-vamped its Locate and Mark training program to ensure that our locators are receiving the best training available. This training consists of multiple classroom-based modules as well as on the job training with trained peer coaches.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 4.2

NUMBER OF OVERPRESSURE EVENTS

PACIFIC GAS AND ELECTRIC COMPANY
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NUMBER OF OVERPRESSURE EVENTS

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PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 4.2
NUMBER OF OVERPRESSURE EVENTS

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (4.2) Overview

1. Metric Definition

Safety and Operational Metric 4.2 – Number of Overpressure (OP) events is defined as:

OP events as reportable under General Order (GO) 112-F 122.2(d)(5).

2. Introduction of Metric

An OP event occurs when the gas pressure exceeds the Maximum Allowable Operating Pressure (MAOP) of the pipeline, plus the build ups, set forth in the Code of Federal Regulations (CFR) – 49 CFR 192.201.

This metric tracks the occurrence of OP events, which includes:

1) High pressure Gas Distribution (GD):
   a) (MAOP 1 pound per square inch gauge (psig) to 12 psig) greater than 50 percent above MAOP.
   b) (MAOP 12 psig to 60 psig) greater than 6 psig above MAOP; and
2) Gas Transmission (GT) pipelines greater than 10 percent above MAOP (or the pressure produces a hoop stress of ≥75 percent Specified Minimum Yield Strength, whichever is lower).

OP events on low pressure systems are excluded from this metric because they are not defined in federal code 49 CFR 192.201.

OP events have the potential to overstress pipelines which pose significant safety and operational risks to Pacific Gas and Electric Company's (PG&E) gas system. PG&E has implemented multiple controls and mitigations to reduce OP events.

Following the San Bruno event in 2010, an Overpressure Elimination (OPE) task force was established to identify the root causes of OP events and develop corrective actions.

In 2011, several decisions were made in response to San Bruno incident. One of the most important corrective actions was to lower the normal operating pressure below the MAOP across the system, which resulted in a significant drop-off of OP events from 2011-2012.

Beginning in 2013, causal evaluations were conducted on all OP events. Corrective actions from these evaluations included: equipment and design review, training, fatigue management, improved Gas Event Reporting, and improved work procedures.

In 2015, several benchmarking studies and industry evaluations were conducted to learn OP elimination best practice. The benchmarking studies and analyses helped influence the development and strategies of the OPE Program.

In 2017, after the Folsom OP event,[1] the OPE Program was stood up under one sponsor with dedicated resources. The OPE Program formalized a two-pronged strategy to mitigate the risk of large OP events, while reducing operational risk: (1) Human (HU) Performance Strategy, and (2) Equipment (EQ)-Related Strategy.

In 2020, PG&E retooled an effort to reduce the number of HU Performance-related events. PG&E contracted with Exponent to perform an analysis on the OP and near hit events using the Human Factors Analysis and Classification System to drive focused actions to improve. This effort helped the team to develop the HU Performance tools to: identify and control risk, improve efficiency, avoid delays, reduce errors, prevent events, and promote excellent performance at every facility.

3. Audit Results

In the Audit Report, Metric 4.2 received a Metric Accuracy Finding of "None." The Other Findings for this metric include "Low pressure events are

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1 On January 24, 2017, the Hydraulically Independent System that delivers gas to the Folsom area experienced a large OP event in excess of the system's 60 psig MAOP. The OP event caused damage to the regulator station equipment and resulted in a significant number of leaks on plastic distribution piping. Inspection of the station revealed that the station filter had been clogged with debris and the regulator boot had been eroded by contaminants. Further investigation revealed that an upstream pigging project scraped corrosion scales from internal pipe walls. The scale—along with other debris—traveled downstream, until eventually collecting at Folsom, causing the OP event.

excluded from the calculation."[2] While Federal code 49 CFR 192.201 does not provide a numerical threshold for events on low pressure systems, PG&E tracks these events internally based on the guidelines set forth in CPUC General Order 58-A and can be provided upon request.

B. (4.2) Metric Performance

1. Historical Data (2011 – June 2025)

Historical data of OP events is available since year 2011. Various data points of each OP event including location, Corrective Action Program (CAP) number, date, cause, corrective action, etc. are documented in the OP master list file attachment.

Data source of the metric is commonly from the Supervisory Control and Data Acquisition (SCADA) system, and from direct accounts, including gauge pressure readings, chart recorders, electronic recorders, and metering data.

The availability of data has expanded throughout the years due to the increase in pressure monitoring devices allowing more OP events to be identified and recorded. In 2012, PG&E had 1,409 SCADA pressure points on its pipeline system, and by end of December 2023, that number had grown to 7,042. As of the end of 2024, there were 7,321 SCADA pressure points throughout the PG&E system, and as of the end of June 2025, there are now 7,390 SCADA pressure points.

2. Data Collection Methodology

PG&E has both an automated process and field process for logging Gas OP events. For the automated process, the SCADA system monitors EQ pressure and notifies potential issues to Gas Control through alarms. For the field process, field personnel are required to gauge pressure during maintenance and clearances and report to Gas Control if an abnormal operating condition arises. The Gas OP metric reporting process flow is as follows:

[2] Audit Report, p. 8, Table 1-1.

1) Control Room Alarm/Third-Party Notification of abnormal pressure reading or Gas Pipeline Operations and Maintenance (GPOM) finds abnormal pressure reading during maintenance.
2) GPOM performs on-site investigation (validates pressure reading and compares onsite pressure with SCADA pressure upon arrival). "As-found" and "as-left" pressures are recorded on maintenance form.
3) Gas Control Room creates Abnormal Incident Report and issues e-page. FIMP reviews the e-page, creates a CAP, and prepares a Quick Hit.
4) OP event is recorded on OP Master List, and Apparent Cause Evaluation is conducted to determine root cause and any corrective actions as applicable.

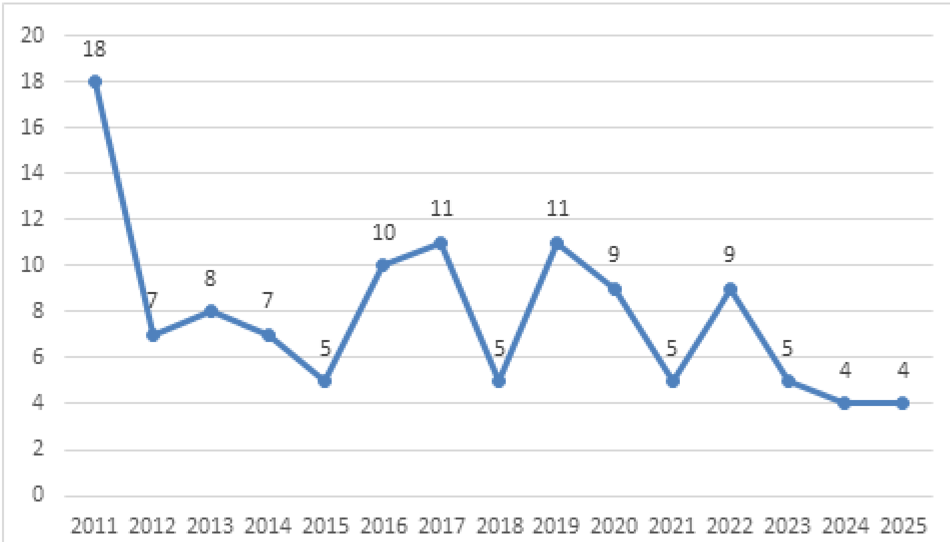
Several controls are in place for this metric:

1) Each OP event is entered into our system of record SAP system CAP to ensure retention of record history.
2) Each OP event's datasets (location, CAP number, date, cause, corrective action etc.) are reviewed by Facility Integrity Management Program team to ensure accuracy and are logged in the OP Master List which is viewable by all PG&E employees; and
3) Each OP event is distributed to stakeholders by an electronic page (e-page) and an e-mail (Quick Hit), reviewed on the next Daily Operations Briefing with leadership.

3. Metric Performance for the Reporting Period

PG&E has experienced four OP events during the first six months of 2025. Although this mid-year number is equal to the total OP events that occurred in all of 2024 (which was the lowest OP events recorded since PG&E begin tracking this metric in 2011), this number is actually less than half of the Safety and Operational Metrics target of 10 events that would indicate poor performance in 2025. None of these 4 events resulted in a loss of containment.

FIGURE 4.2-1
OP EVENTS 2011 – Q2 2025



C. (4.2) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

None. The 2025 target is set to be 10 (i.e., same as 2024 target); the 2029 target is set to be 8 (i.e., one less than the 2028 target).

2. Target Methodology

To establish the 1-year and 5-year targets, PG&E considered the following factors:

- Historical Data and Trends: OP events have ranged from 4 to 11 events per year since 2012. We exclude data from 2011, because it was the first year OP data was collected and several anomalies were embedded in the data and is shown for reference purposes only. The upper limit for target-setting is based on the maximum number of events in the past thirteen years;
- Benchmarking: This metric is not traditionally benchmarkable; however, PG&E has contracted with third parties to conduct international and North American industry evaluations. The benchmarking studies indicated that PG&E has demonstrated strong performance in this area;
- Regulatory Requirements: OP events as reportable under California Public Utilities Commission GO No.112-F, 122.2(d)(5);
- Attainable Within Known Resources/Workplan: Yes;

- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: Yes, performance at or below the maximum of the past thirteen years is a sustainable assumption for maintaining metric performance, plus room for non-significant variability; and
- Other Qualitative Considerations: The approach of using the maximum of the past thirteen years includes the consideration of the expected impact of ongoing SCADA device installations—improved system visibility and monitoring points may result in a higher number of observed OP events. Additionally, as the OP Program has expanded, there has been an increase in pressure monitoring devices throughout the system, which allows more OP events to be identified and recorded.

3. 2025 Target

The upper limit for the 2025 target is based on the maximum of the past thirteen years historical performance. The target is based on the highest number annual events, within 95 percent confidence level (within two standard deviations) of the average number of events, and reflects a trend of continuous improvement. This target represents an appropriate indicator light to signal a review of potential performance issues. Target should not be interpreted as intention to worsen performance.

4. 2029 Target

The 2029 target reflects a 5-year outlook target demonstrating continued focus on improvement year-over-year. This target demonstrates continued focus on improvement year-over-year. PG&E continues to review operations and look for opportunities to perform work to further reduce OP events and contribute to system safety. However, it should be noted that in D.21-11-069 the Commission denied or reduced funding for a number of the OPE mitigation programs in the 2023 General Rate Case final decision, especially in the GD area.[3] It is unknown what impact this will have on the future trend of OP events, but not adopting these programs is expected to decrease the pace of PG&E's mitigation efforts to reduce OP events in the

[3] The GT and GD Station OPP Enhancement Programs were not adopted by the commission. Similarly, GD SCADA RTU installations were not adopted. All three of these programs are risk mitigations for large OP events.

future. Therefore, despite not receiving authorization from the rate case, PG&E continues to fund the OP elimination efforts - although at a reduced pace.

D. (4.2) Performance Against Target

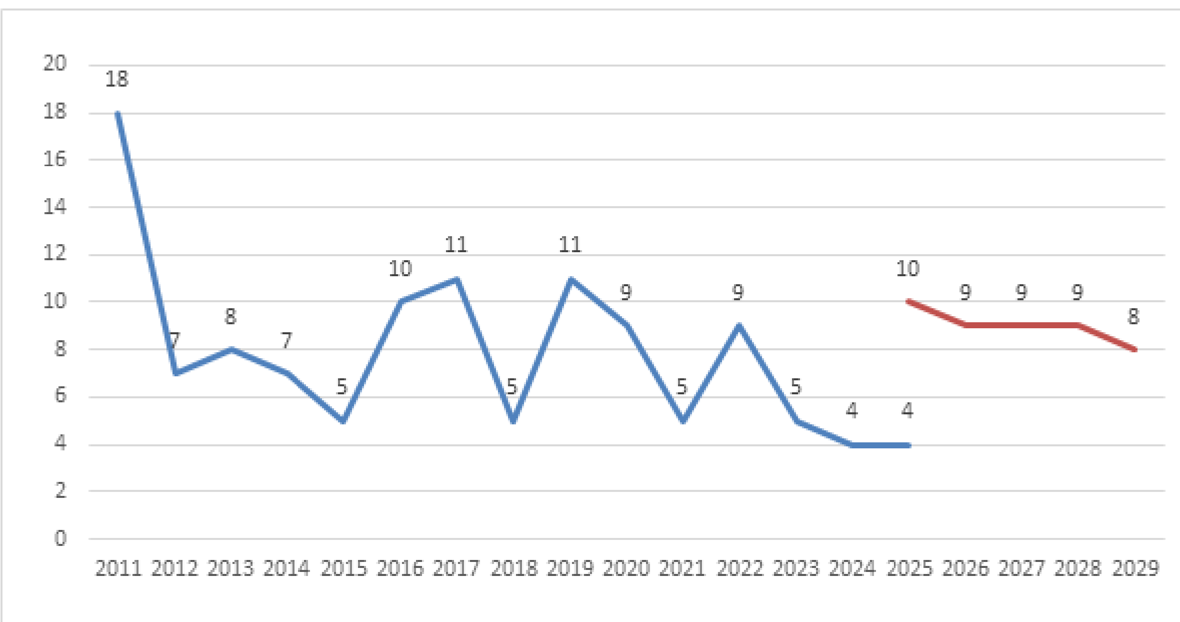
1. Progress Towards the 1-Year Target

In the first six months of 2025, four OP events occurred in PG&E's gas system, which is less than one-half of the Company's 1-year target of equal to or less than 10.

2. Progress Towards the 5-Year Target

As discussed in Section E below, PG&E is deploying several programs to maintain or improve the long-term performance of the Over Pressure metric to meet the Company's 5-year performance target.

FIGURE 4.2-2
OP EVENTS 2011 – Q2 2025 AND TARGETS 2025 THROUGH 2029



E. (4.2) Current and Planned Work Activities

PG&E's initial objective included plans to execute the secondary Overpressure Protection Program (OPP) to mitigate common failure mode failure OP events for both GT and GD over a 10-year period (2018-2027). As noted, funding for the following mitigation programs was eliminated in the 2023 GRC decision:

- Gas Distribution: Since the inception of the common failure mode mitigation program through the first six months of 2025, PG&E has retrofitted approximately 1,008 GD pilot-operated stations. By end of 2023, PG&E has exceeded the goal of retrofitting 50 percent of GD pilot-operated stations. PG&E will continue the retrofitting of GD pilot-operation stations to mitigate the common failure mode OP events in the Gas Distribution System. These retrofits will be executed at a considerably reduced pace in comparison to what was proposed in the GRC (see footnote 2 on page 4.2-7).
- Gas Transmission: In 2019, PG&E started rebuilding and retrofitting Large Volume Customer Regulators (LVCR) sets specifically to address OP risks and started rebuilding and/or retrofitting Large Volume Customer Meter (LVCM) sets in 2023. Since the inception of the common failure mode mitigation program through the first six months of 2025, PG&E has rebuilt and/or retrofitted with slam shuts approximately 132 GT pilot-operated stations. PG&E will continue modifying GT LVCRs/LVCMs to mitigate the common failure mode OP events in the Gas Transmission System. The modification of this regulation equipment will be executed at a considerably reduced pace in comparison to what was proposed in the 2023 GRC (see footnote 2 on page 4.2-7).

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 4.3

TIME TO RESPOND ON SITE TO EMERGENCY NOTIFICATION

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TIME TO RESPOND ON SITE TO EMERGENCY NOTIFICATION

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (4.3) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 4.3 – Time to Respond On-Site to Emergency Notification is defined as:

Average time and median time to respond on-site to a gas-related emergency notification from the time of notification to the time a Gas Service Representative (GSR) (or qualified first responder) arrived onsite. Emergency notification includes all notifications originating from 911 calls and calls made directly to the utilities' safety hotlines.

The data used to determine the average time and median time shall be provided in increments as defined in General Order 112-F 123.2 (c) as supplemental information, not as a metric.

2. Introduction of Metric

Gas emergency response measures Pacific Gas and Electric Company's (PG&E or the Company) ability to respond with urgency to hazardous or unsafe situations that may be a threat to customer and public safety. In some situations, GSRs respond to emergency situations as first responders. Responding to emergency situations is PG&E's highest priority so that PG&E can prevent or ameliorate hazardous situations. PG&E's goal is to have a GSR on-site as quickly as possible for customer generated gas odor calls. Faster response time to Emergency Notifications reduces the length of emergent situations.

PG&E's GSRs respond to approximately 500,000 gas service customer requests annually. These requests include investigating reports of possible gas leaks; carbon monoxide monitoring; Pilot re-lights; appliance safety checks; and maintenance work, including Atmospheric Corrosion remediation and regulator replacements.

Consistent with current practice, PG&E will continue to treat all customer-reported gas odor calls as Immediate Response (IR) and will attempt to respond to such calls within 60 minutes. To meet this goal, PG&E utilizes industry best practices, such as: mobile data terminals, real-time Global Positioning Systems, backup on-call technicians, and shift coverage of 24 hours a day, seven days a week.

3. Audit Results

In the Audit Report, Metric 4.3 received a Metric Accuracy Finding of "None." The Other Findings for this metric include "Response times for crews who were already onsite included for a small number of events."[1] With respect to this finding, response times for crews who were already onsite are excluded from the metric. However, very short response times may be included for a small number of events but do not affect the accuracy of our reported metric.

B. (4.3) Metric Performance

1. Historical Data (2011-June 2025)

Historical data is presented as a value in minutes for response time, indicated as both an average and a median value for all Emergency Notifications for each calendar year.

Data sets prior to 2014 come from historically submitted documentation; data sets from 2014 forward come from the Customer Data Warehouse system (a database for Field Automated Systems (FAS) data) and go through a rigorous, multi-step audit process prior to submission to ensure accuracy and precision.

2. Data Collection Methodology

The response time by PG&E is measured from the time PG&E is notified—defined as the order creation time in Customer Care and Billing by the contact center—to the time a GSR or a PG&E-qualified first responder arrives on-site to the emergency location (including Business Hours and After Hours). PG&E notification time is defined as when a gas emergency order is created and timestamped.

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1 Audit Report, p. 8, Table 1-1.

Using PG&E's FAS, the average response time is measured for all IR gas emergency orders generated where a GSR or qualified first responder is required to respond.

The following IR gas emergency jobs are excluded in the total gas emergency orders volume count:

- Level 2 and above emergencies;[2]
- If the source is a non-planned release of PG&E gas, the original call is included—the gas emergency itself—and all subsequent related orders are excluded;
- If the source is either a planned release of PG&E gas or another non-leak-related event, all related orders from the metric are excluded, including the original call;
  - If technician finds Grade 1 or Class A leak not previously identified by Company personnel, the order will be included in the metric even if the leak was clearly not the source of odor complaint.
- Duplicate orders for assistance;
  - If it is confirmed that internal PG&E personnel made an IR for the wrong address and there are two IRs made for one incident, we will manually adjust the Taken Time of 2nd IR (the correct address) to the actual time the call was created, and then exclude the 1st IR (the incorrect address). For now, the Customer Data Warehouse/Business Objectives team will have to manually adjust the Taken Time.
- Cancelled orders;
- For multiple leak calls from the same Multi-Meter Manifold;[3]
- Unknown premise tag with no nearby gas facility; and
- If the FAS system is unavailable—such as during a tech down event—the jobs cannot be created in our system, and are therefore, an exception (not available to be included in the volume).

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[2] Defined in the Gas Emergency Response Plan as a region-wide emergency event that may require 1-2 days for service restoration.

[3] The first order is included, and all subsequent orders are excluded.

3. Metric Performance for the Reporting Period

Since 2011, PG&E has improved and maintained strong performance in this metric. In 2025, we have achieved an average response time of 19.8 minutes and a recorded median response time of 18.3 minutes, compared to 19.5 minutes of average response time and 18.0 minutes of median response time for the same period in 2024. Our performance in 2025 outperformed target and was among our best response times over the past nine years as shown in Figure 4.3-1. This was made possible by continued focus by our Field Teams and Gas Dispatch deploying Lean practices, cross collaboration and continued accountability and focus on this metric.

FIGURE 4.3-1
AVERAGE RESPONSE TIME
(2017-Q2 2025)

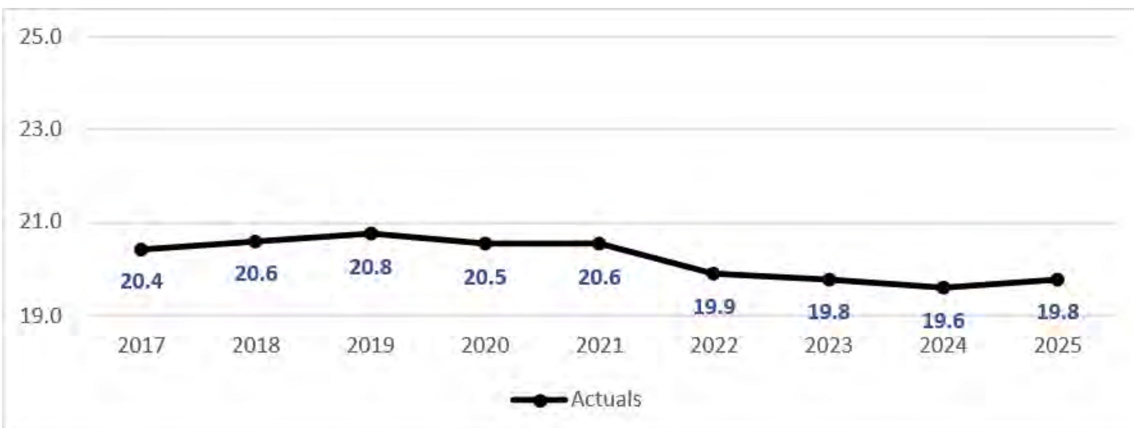
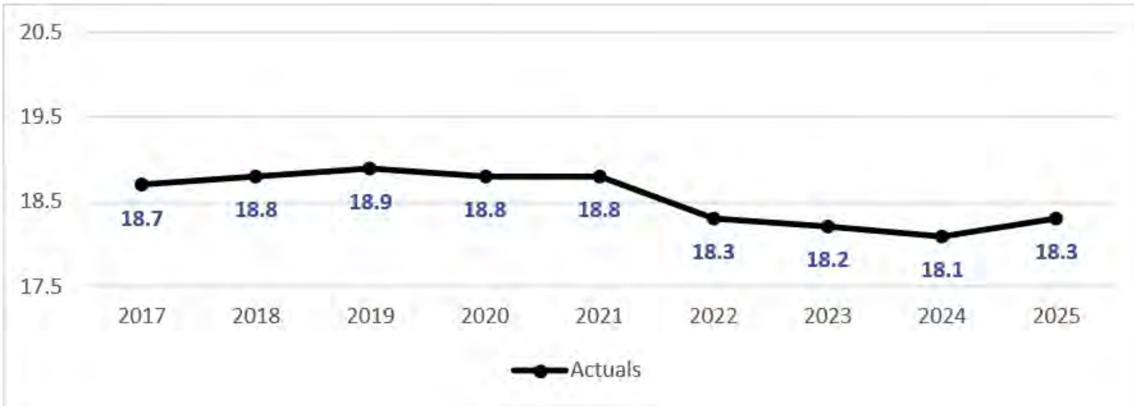


FIGURE 4.3-2
MEDIAN RESPONSE TIME
(2017-Q2 2025)



C. (4.3) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

None. Applying the same methodology as in the last SOMs report, there will be a reduction to the 1-year and 5-year targets as described below, reflecting a trend of improved performance.

2. Target Methodology

To establish the 1-year and 5-year targets, PG&E considered the following factors:

- Historical Data and Trends: Comparable data is available starting in 2015. Performance has been consistent from 2015-Q2 2025 and maintains top quartile;
- Benchmarking: The targets for average response time and median response time are informed by available benchmarking data and targets are set at a level consistent with strong performance;
- Regulatory Requirements: None;
- Attainable Within Known Resources/Work Plan: Yes;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: Yes, performance at or below the set targets is a sustainable assumption for maintaining average and median response time performance, plus room for non-significant variability; and
- Other Qualitative Considerations: None.

3. 2025 Target

The 2025 target is to maintain performance better than or equal to 21.3 minutes for average response time and 19.6 minutes for median response time, based on the factors described above. These targets represent values that serve as appropriate indicator lights to signal a review of potential performance issues. Targets should not be interpreted as intention to worsen performance.

4. 2029 Target

The 2029 target is to maintain performance better than or equal to 20.9 minutes for average response time and 19.2 minutes for median response time, based on the factors described above. Annual targets should continue to be informed by available benchmarking data.

D. (4.3) Performance Against Target

1. Maintaining Performance Against the 1-Year Target

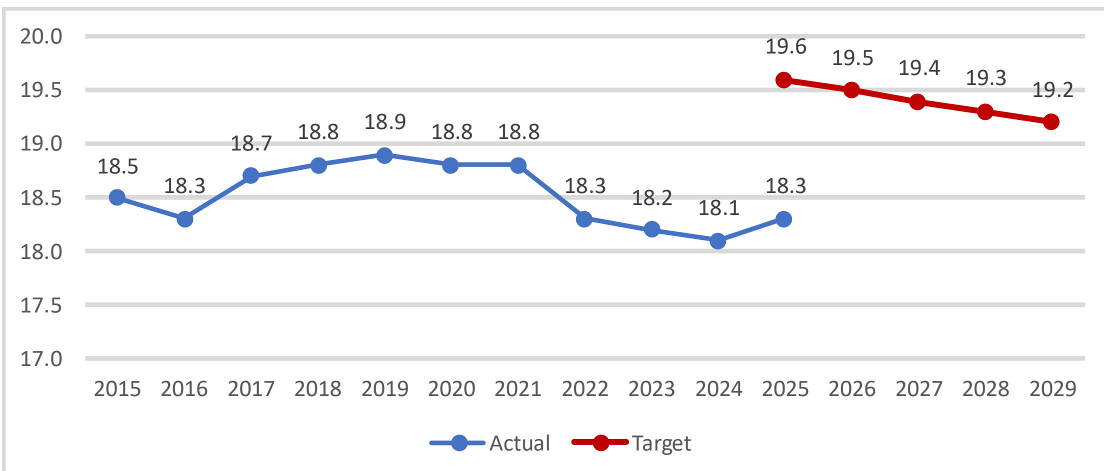
As demonstrated in Figure 4.3-3 and 4.3-4, PG&E saw an average response time of 19.8 minutes and a median response time of 18.3 minutes in 2025 which exceeded the Company's 2025 target of 21.3 and 19.6 minutes, respectively.

2. Maintaining Performance Against the 5-Year Target

As discussed in Section E below, PG&E continues to employ thorough review, auditing, and cross-functional programs to maintain performance in pursuit of the Company's 5-year target.

FIGURE 4.3-3
AVERAGE RESPONSE TIME 2014-Q2 2025 AND TARGETS THROUGH 2029

FIGURE 4.3-4
MEDIAN RESPONSE TIME 2015-Q2 2025 AND TARGETS THROUGH 2029



E. (4.3) Current and Planned Work Activities

Below is a summary description of the key activities that are tied to performance and their description of that tie.

- Field Service and Gas Dispatch: PG&E's Field Service and Gas Dispatch partner together to respond to customer Gas Emergency (odor calls). There is a shared responsibility in the overall performance of this work. GSRs are deployed systemwide, 24 hours a day—utilizing an on-call as needed;
- Monitoring Controls: Activities which help us to maintain our Gas Emergency Response include continued focus and visibility in our Daily Operating Reviews, Weekly Operating Reviews, and Cross Functional

Reviews. These help to illustrate several key drivers, including Dispatch Handle Time, Drive Time, and Wrap Time; and

- Audits: PG&E performs audits on Emergency calls to identify opportunities.
- Data Analysis: Staffing and historical Gas Emergency Response volume are reviewed to help drive decisions. We utilize Best Practice of Dispatching to the closest resource. In addition, Dispatcher Ride Alongs with GSRs have been implemented to drive cross-functional understanding.

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CHAPTER 4.4

GAS SHUT-IN TIME, MAINS

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The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (4.4) Introduction

1. Metric Definition

Safety and Operational Metric (SOM) 4.4 – Gas Shut-In Time, Mains is defined as:

Median time to shut-in gas when an uncontrolled or unplanned gas release occurs on a main. The data used to determine the median time shall be provided in increments as defined in General Order 112-F 123.2 (c) as supplemental information, not as a metric.

2. Introduction of Metric

The measurement of Gas Shut in Time captures the median duration of time required to respond to and mitigate potentially hazardous gas leak conditions. These leak conditions are associated with the public safety risk of loss of containment on Gas Distribution Main or Service. The term "shut in" refers to the act of stopping the gas flow. It is important for the flow of gas to be stopped to avoid consequences such as overpressure events or explosions and so that work can be safely performed to make repairs in a timely manner. Performance aims for faster response times as a measure of prevention resulting in lower risk of an incident impacting public safety and minimized interruption to the gas business and customers. It is imperative that we promptly and effectively resolve any hazardous conditions on our distribution network while balancing timeliness, customer outages, and employee safety.

The timing for the response starts when the Pacific Gas and Electric Company (PG&E, the Company, or the Utility) first receives the report of a potential gas leak and ends when the Utility's qualified representative determines, per the Utility's emergency standards, that the reported leak is not hazardous, a leak does not exist, or the Utility's representative completes actions to mitigate a hazardous leak and render it as being non-hazardous (i.e., by shutting-off gas supply, eliminating subsurface leak migration, repair, etc.) per the Utility's standards.

This metric measures the median number of minutes required for a qualified PG&E responder to arrive onsite and stop the flow of gas as result of damages impacting gas mains from PG&E distribution network. It does not include instances where a qualified representative determines that the reported leak is not hazardous, or a leak does not exist.

3. Audit Results

In the Audit Report, Metric 4.4 received a Metric Accuracy Finding of "None." There were no Other Findings for this metric.[1]

B. (4.4) Metric Performance

1. Historical Data (2014 – June 2025)

Historical data for Shut-In the Gas (SITG) Main metric is available for the period 2014 through Q2 2025. The data captures the median time that a qualified first responder requires to respond and stop gas flow during incidents involving an unplanned and uncontrolled release of gas on distribution mains. This data includes incidents related to distribution main pipelines and regulator stations because of third-party dig-ins, vehicle impacts, explosion, pipe rupture, and material failure.

Before 2014, PG&E used a decentralized emergency process to manage emergencies (i.e., each division used its own resources like mappers, planners, among others to track and manage emergencies). Similarly, support organizations like Dispatch, Mapping and Planning used their own management tools to help schedule and manage emergency information. Dispatch used a management tool called Outage Management that recorded times at various stages of the process (i.e., when the emergency call came in, when the Gas Service Representative arrived at the site, when the leak was isolated, etc.). The Distribution Control Room used a tool called Gas Logging System to record incoming information.

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[1] Audit Report, p. 8, Table 1-1.

In 2014, a centralized process was implemented to allow Distribution, Transmission, Dispatch, Planning and Mapping personnel to be co-located and work together as a team to manage emergencies. This centralized process also allowed the development of the Event Management Tool (EMT) system.

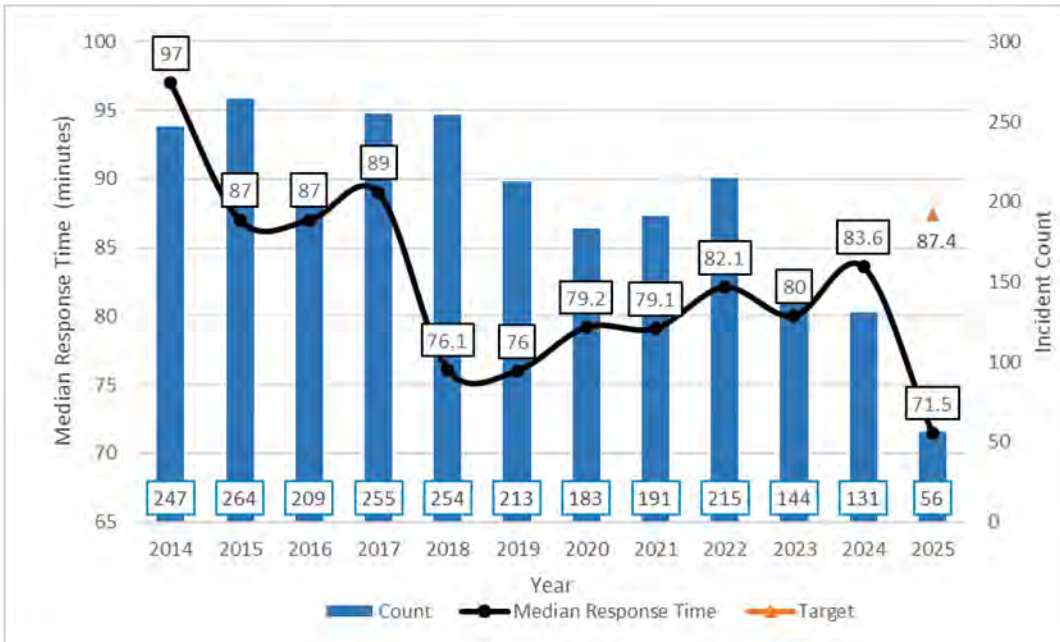
2. Data Collection Methodology

The EMT is currently used as the official system to track gas emergencies from start to finish. It is used by Dispatch and Gas Distribution Control Center teams to create emergency events and collect incident information and allows PG&E to run reports and retrieve historical information. The data captures the time that a qualified first responder requires to respond and stop gas flow during incidents involving an unplanned and uncontrolled release of gas on distribution mains. There are distinct types of incidents recorded in the EMT: explosions, corrosion, cross bore, pipe damage, dig-ins, evacuations, exposed pipe—no gas leak, fires, gas leaks (including Grade 1), high concentration areas, Hi/Lo pressures, material failure, pipe ruptures, vehicle impacts, among others. The EMT provides access to the latest information on an incident. All emergency data is consolidated and stored in one place.

3. Metric Performance for the Reporting Period

The range of data available to calculate the historical shut-in the gas median time for Mains is from 2014 through Q2 2025. Over this reporting period, performance improved from 97 minutes in 2014 to 71.5 minutes median time in 2025. This long-term improvement is due to strategically prearranging construction crews in locations with high frequency of damages after business hours and weekends, understanding root causes for long shut-in time incidents and sharing best practices system wide during weekly performance review calls. These proactive actions combined with response to incidents that did not involve complicated isolation strategies resulted in a 14 percent improvement compared to 2024 results. This mid-year result drastically reverses the upward trend in performance in the 2019 to 2024 period despite the continuous downward trend in the number of main incidents. It is important to note that the lower volume of incidents can result in pronounced median time fluctuations throughout the year. Decreased incident numbers can be attributed to efforts put forth by damage prevention teams within PG&E.

FIGURE 4.4-1
GAS SHUT-IN TIME, MAINS MEDIAN RESPONSE TIME
2014-Q2 2025



Year	Count	Median	Target
2014	247	97	
2015	264	87	
2016	209	87	
2017	255	89	
2018	254	76.1	
2019	213	76	
2020	183	79.2	
2021	191	79.1	
2022	215	82.1	
2023	144	80	
2024	131	83.6	
2025	56	71.5	87.4

C. (4.4) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

The 2025 target is set as the average of the annual median times the past 7-years (2018-2024) + 10 percent. The 2029 target will be flat, aligned with 2025 target. This target is set to prioritize the safety of our customers, employees, and to minimize service disruptions by allowing PG&E personnel to make informed shut-in gas isolation decisions according to field conditions rather than hastily take actions to shut-in the gas to meet a more stringent target.

2. Target Methodology

To establish the 1-year and 5-year targets, PG&E considered the following factors:

- Historical Data and Trends: As of 2024, the target was based on the average of the 2018-2021 median historical data, plus 10 percent. Starting in 2025, the target is based on the average of the 2018-2024 historical data, plus 10 percent. The 7-year period is being used to include recent performance in target setting calculations. Furthermore, the 7-year period is used because 2018 was when the FAS system was first utilized, and this data period is consistent with current operational practices. The use of 10 percent allows for non-significant variability, and accounts for the consideration of risk during shut in events.
- Benchmarking: Not available;
- Regulatory Requirements: None;
- Attainable Within Known Resources/Work Plan: Yes;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: Yes, performance at or below the average of the 2018-2024 annual median response time plus 10 percent is a sustainable assumption for maintaining the improvement from 2018-2024 time frame plus room for non-significant variability; and
- Other Qualitative Considerations: Reducing shut in time to the lowest possible result is not necessarily the best approach from a public safety standpoint, and there is consideration of risk in various situations. In

some instances, the safest decision for our employees and the public is to allow the gas to escape before crews shut it off.

3. 2025 Target

The 2025 target is to maintain performance at or lower than 87.4 minutes based on the factors described above. This target was established to account for the consideration of risk in various situations and aligns with our commitment to the safe operations of our assets. This target represents an appropriate indicator light to signal a review of potential performance issues. Target should not be interpreted as intention to worsen performance.

4. 2029 Target

The 2029 target is to maintain performance at or lower than 87.4 minutes, based on the factors described above.

D. (4.4) Performance Against Target

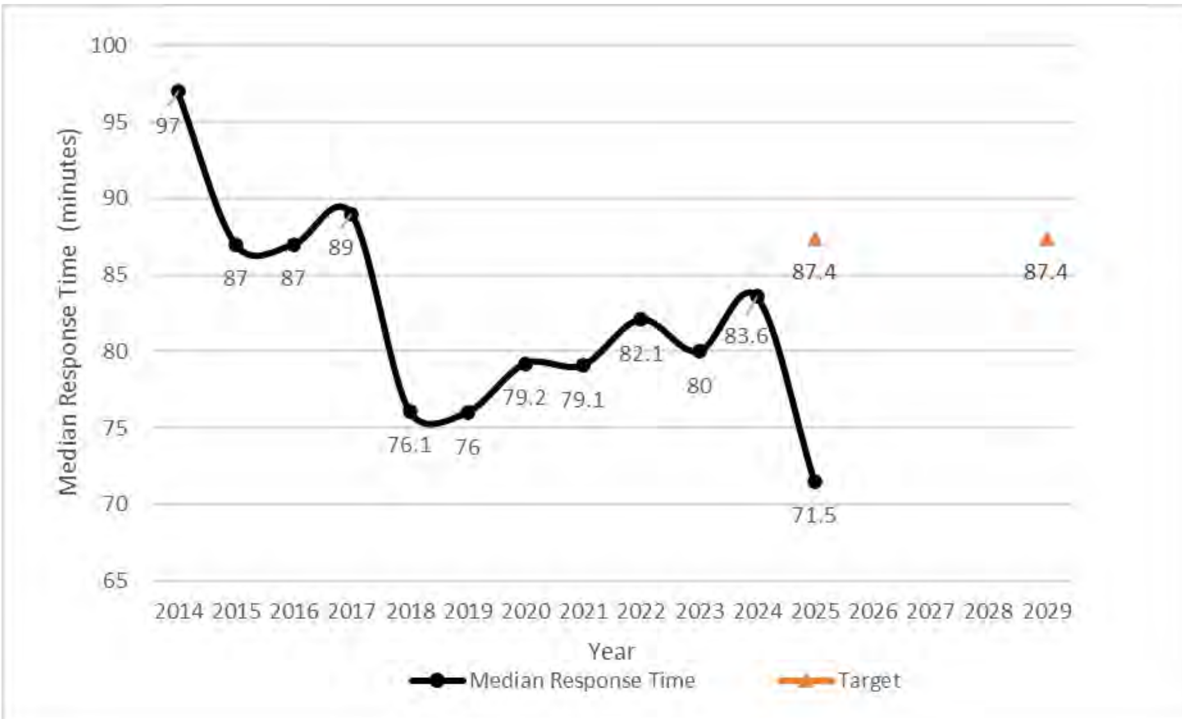
1. Maintaining Performance Against the 1-Year Target

As demonstrated in Figure 4.4-2, PG&E saw a median response time of 71.5 minutes in 2025, which is better than the Company's 1-year target of 87.4 minutes.

2. Maintaining Performance Against the 5-Year Target

As discussed in Section E, PG&E will continue mitigating the risk of loss of containment on Gas Distribution Mains and Services and employing its various programs to maintain performance in its efforts toward its 5-year target.

FIGURE 4.4-2
GAS SHUT IN TIME, MAINS MEDIAN RESPONSE TIME 2014-Q2 2025 AND TARGETS 2025 THROUGH 2029



E. (4.4) Current and Planned Work Activities

PG&E will continue to drive metric progress through performance management and supervisor-out-in-the-field initiatives. This metric will continue to mitigate the risk of loss of containment on Gas Distribution Main or Service by reducing distribution pipeline rupture with ignition.

The metric is supported by the following programs which focus on improving public safety: Field Services and Gas Maintenance and Construction (M&C).

- Gas Field Service: Field Service responds to gas service requests, which include investigation reports of possible gas leaks, carbon monoxide monitoring, customer requests for starts and stops of gas service, appliance pilot re-lights, appliance safety checks, as well as emergency situations as first responders; and
- Gas Maintenance and Construction: Gas M&C performs routine maintenance of PG&E's gas distribution facilities, which includes emergency response due to dig-ins, as well as leak repairs.

The following process improvement initiatives have been implemented to help achieve metric results:

- Purchased and implemented emergency trailers in every division, allowing for emergency equipment to be accessed quickly and easily;
- Purchased additional steel squeezers for 2-8” steel pipe (housed on emergency trailers);
- Implemented Emergency Management tool (EM tool) to alert M&C of SITG events when notified by third-party emergency organizations;
- Established concurrent response protocol (dispatch M&C and Field Service resources) when notified by emergency agencies. Utility Procedure TD-6100P-03 Major Gas Event Response: Fire, Explosion, and Gas Pipeline Rupture was updated in 2021 to align with PG&E’s response and communication protocols; and
- Implemented 30-60-90-120+ minute communication protocols between Gas Distribution Control Center and Incident Commander to ensure consistent communication and issue escalation during events.

The following process improvement initiatives are on-going to help achieve metric results:

- Daily Operating Reviews to identify deviations from the targets for the previous 24 hours and identify countermeasures for continuous improvement;
- Weekly Operating Review meetings weekly to share best practices and review long duration events;
- Live action drills to simulate emergency scenarios, practicing isolation procedures and documenting lessons learned;
- Time duration threshold to review incidents during Gas Daily Briefings reduced from >120 to > 90 minutes;
- Dispatching two M&C crews along with an excavation truck to assist in excavation timeliness;
- Dispatching locate and mark representative upon initial discovery to assist in leak location prior to M&C crew arrival;
- Dispatch initiating underground service alerts followed by immediate notification to allow for immediate marking of facilities;
- Increasing number of isolation valves along a pipeline for ease of isolation;
- Gas Distribution Control Center to contact M&C Superintendent at the 90-minute mark instead of the previous 120-minute protocol. This updated

guideline is to increase collaboration among different stakeholders and improve delivery and implementation of isolation strategies;

- Pilot update to EMT tool to have Gas Distribution Control Center and Planning Team develop and communicate isolation strategies to Maintenance and Construction crews < 30 minutes from initial incident notification; and
- Completed pilot process to have General Construction crews provide emergency support if Division M&C Crews not available due to rest period (pilot program in San Jose, Fresno and Bakersfield).

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 4.5

GAS SHUT IN TIME, SERVICES

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The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (4.5) Overview

1. Metric Definition

Safety and Operational Metric 4.5 – Gas Shut-In Time, Services is defined as:

Median time to shut-in gas when an uncontrolled or unplanned gas release occurs on a service. The data used to determine the median time shall be provided in increments as defined in General Order 112-F 123.2 (c) as supplemental information, not as a metric.

2. Introduction of Metric

The measurement of Gas Shut-In Time captures the median duration of time required to respond to and mitigate potentially hazardous gas leak conditions. These leak conditions are associated with the public safety risk of loss of containment on Gas Distribution Main or Service. The term “shut-in” refers to the act of stopping the gas flow. It is important for the flow of gas to be stopped to avoid consequences such as overpressure events or explosions and so that work can be safely performed to make repairs in a timely manner. Performance aims for faster response times as a measure of prevention resulting in lower risk of an incident impacting public safety and minimized interruption to the gas business and customers. It is imperative that we promptly and effectively resolve any hazardous conditions on our distribution network while balancing timeliness, customer outages, and employee safety.

The timing for the response starts when Pacific Gas and Electric Company (PG&E, the Company, or the Utility) first receives the report of a potential gas leak and ends when the Utility’s qualified representative determines, per the Utility’s emergency standards, that the reported leak is not hazardous, a leak does not exist, or the Utility’s representative completes actions to mitigate a hazardous leak and render it as being non-hazardous (e.g., by shutting-off gas supply, eliminating subsurface leak migration, repair, etc.) per the Utility's standards.

This metric measures the median number of minutes required for a qualified PG&E responder to arrive onsite and stop the flow of gas as result of damages impacting gas mains from PG&E distribution network. It does not include instances where a qualified representative determines that the reported leak is not hazardous, or a leak does not exist.

3. Audit Results

In the Audit Report, Metric 4.5 received a Metric Accuracy Finding of "None." There were no Other Findings for this metric.[1]

B. (4.5) Metric Performance

1. Historical Data (2014 – June 2025)

Historical data for Shut-In the gas (SITG) Services metric is available for the period 2014 – Q2 2025. The data captures the median time that a qualified first responder is required to respond and stop gas flow during incidents involving an unplanned and uncontrolled release of gas on services. This data includes incidents related to distribution services and related components such as service lines, valves, risers, and meters due to third party dig-ins, vehicle impacts, explosion, pipe rupture, and material failure.

Before 2014, PG&E used a decentralized emergency process to manage emergencies, i.e., each division used its own resources like mappers, planners, among others to track and manage emergencies. Similarly, support organizations like Dispatch, Mapping and Planning used their own management tools to help schedule and manage emergency information. Dispatch used a management tool called Outage Management that recorded times at various stages of the process (i.e., when the emergency call came in, when the Gas Service Representative (GSR) arrived at the site, when the leak was isolated, etc.). The Distribution

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[1] Audit Report, p. 8, Table 1-1.

Control Room used a tool called Gas Logging System to record incoming information.

In 2014, a centralized process was implemented to allow Distribution, Transmission, Dispatch, Planning and Mapping personnel to be co-located and work together as a team to manage emergencies. This centralized process also allowed the development of the Event Management Tool (EMT) system.

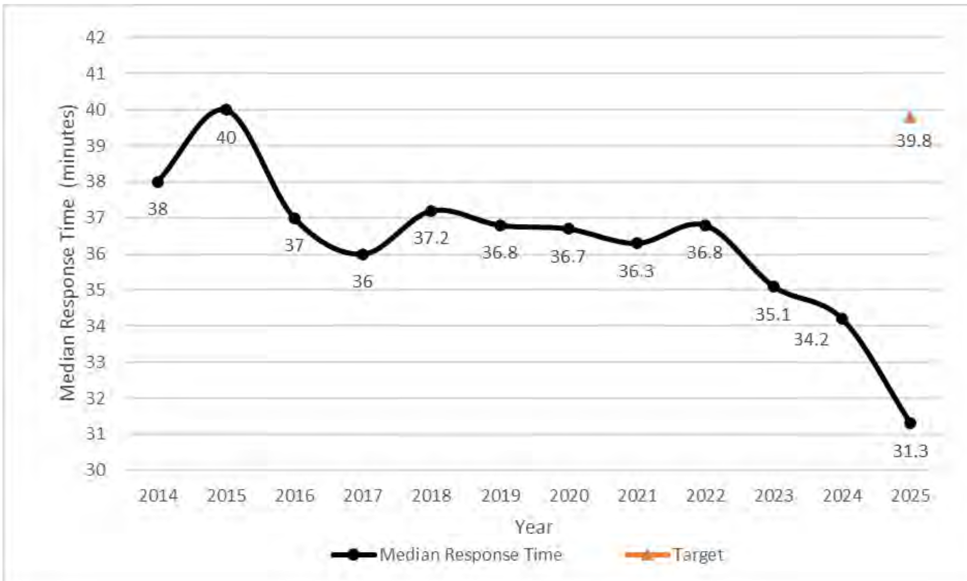
2. Data Collection Methodology

The EMT is currently used as the official system to track gas emergencies from start to finish. The EMT is used by Dispatch and Gas Distribution Control Center (GDCC) teams to create emergency events and collect incident information and allows PG&E to run reports and retrieve historical information. There are distinct types of incidents recorded in the EMT: explosions, corrosion, cross bore, pipe damage, dig-ins, evacuations, exposed pipe—no gas leak, fires, gas leaks (including Grade 1), high concentration areas, Hi/Lo pressures, material failure, pipe ruptures, vehicle impacts, among others. The EMT provides access to the latest information on an incident. All emergency data is consolidated and stored in one place.

3. Metric Performance for the Reporting Period

The range of data available to calculate the historical SITG median time for Services is from 2014 to Q2 2025. Over this reporting period, performance improved by 17.6 percent, decreasing from 38.0 minutes in 2014 to 31.3 minutes through Q2 2025. This response time represents an improvement of 8.5 percent compared to 2024 end of year results. The continuous improvement is due to strategically prearranging construction crews in locations with high frequency of damages after business hours and weekends, understanding root causes for long shut-in time incidents, sharing best practices system wide during weekly performance review calls, First Responders personnel squeezing services on arrival when possible, and Excess Flow Valves stopping flow of gas when triggered.

FIGURE 4.5-1
GAS SHUT IN TIME, SERVICES MEDIAN RESPONSE TIME 2014-Q2 2025



C. (4.5) 1-Year Target and 5-Year Target

1. Updates to 1-Year and 5-Year Targets Since Last Report

The 2025 target is set as the average of the annual median times the past seven years (2018-2024) + 10%. The 2029 target will be flat aligned with 2025 target.

2. Target Methodology

To establish the 1-year and 5-year targets, PG&E considered the following factors:

- Historical Data and Trends: As of 2024, the target was based on the average of the 2018 - 2021 median historical data, plus 10 percent. Starting in 2025, the target is based on the average of the 2018-2024 historical data, plus 10 percent. The seven-year period is being used to include recent performance in target setting calculations. Furthermore, the seven-year period is used because 2018 was when the FAS system was first utilized, and this data period is consistent with current operational practices. The use of 10 percent allows for non-significant variability, and accounts for the consideration of risk during shut in events;
- Benchmarking: Not available;

- Regulatory Requirements: None;
- Attainable Within Known Resources/Work Plan: Yes;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: Yes, performance at or below the average of the 2018-2024 annual median response time plus 10 percent is a sustainable assumption for maintaining the improvement from 2018-2024 time-frame plus room for non-significant variability; and
- Other Qualitative Considerations: Reducing shut in time to the lowest possible result is not necessarily the best approach from a public safety standpoint, and there is consideration of risk in various situations. In some instances, the safest decision for our employees and the public is to allow gas to escape while we identify and perform the safest means of isolating the gas.

3. 2025 Target

The 2025 target is to maintain performance at or lower than 39.8 minutes based on the factors described above. This target was established to account for the consideration of risk in various situations and aligns with our commitment to the safe operations of our assets. This target represents an appropriate indicator light to signal a review of potential performance issues. Target should not be interpreted as intention to worsen performance.

4. 2029 Target

The 2029 target is to maintain performance at or lower than 39.8 minutes based on the factors described above.

D. (4.5) Performance Against Target

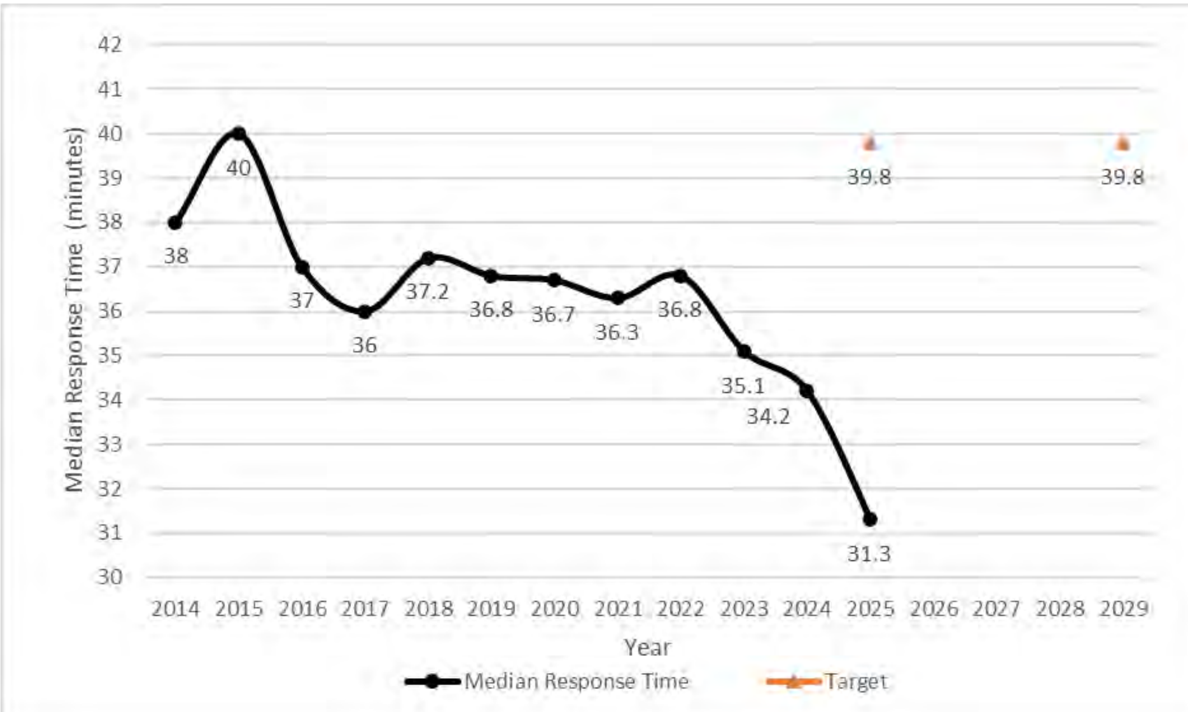
1. Maintain Performance Against the 1-Year Target

As demonstrated in Figure 4.5-2, PG&E saw a median response time of 31.3 minutes in 2025, which is better than the Company's 1-year target of 39.8 minutes.

2. Maintain Performance Against the 5-Year Target

As discussed in Section E, PG&E will continue mitigating the risk of loss of containment on Gas Distribution Mains and Services and employing its various programs to maintain performance in its efforts toward its 5-year target.

FIGURE 4.5-2
GAS SHUT IN TIME, SERVICES MEDIAN RESPONSE TIME 2014-Q2 2025 AND TARGETS FROM 2025 AND 2029



E. (4.5) Current and Planned Work Activities

PG&E will continue to drive metric progress through performance management and supervisor-out-in-the-field initiatives. This metric will continue to mitigate the risk of loss of containment on Gas Distribution Main or Service by reducing distribution pipeline rupture with ignition.

The metric is supported by the following programs which focus on improving public safety: Field Services and Gas Maintenance and Construction (M&C).

- Gas Field Service: Field Service responds to gas service requests, which include investigation reports of possible gas leaks, carbon monoxide monitoring, customer requests for starts and stops of gas service, appliance pilot re-lights, appliance safety checks, as well as emergency situations as first responders.

- Gas M&C: Gas M&C performs routine maintenance of PG&E's gas distribution facilities, which includes emergency response due to dig-ins, as well as leak repairs.

The following process improvement initiatives have been implemented to help achieve metric results:

- Enhanced plastic squeeze capability from approximately 50 percent to all GSRs for < 1" plastic pipe.
- Purchased and implemented emergency trailers in every division, allowing for emergency equipment to be accessed quickly and easily.
- Purchased additional steel squeezers for 2-8" steel pipe (housed on emergency trailers).
- Implemented Emergency Management tool (EM tool) to alert M&C of SITG events when notified by third-party emergency organizations.
- Established concurrent response protocol (dispatch M&C and Field Service resources) when notified by emergency agencies. Utility Procedure TD-6100P-03 Major Gas Event Response: Fire, Explosion, and Gas Pipeline Rupture was updated in 2021 to align with PG&E's response and communication protocols.
- Implemented and updated 30-60-90-120+ minute communication protocols between GDCC and Incident Commander to ensure consistent communication and issue escalation during events.
- Continue to explore alternatives to improve overall response time such as completion of pilot program to have General Construction crews provide emergency support if M&C crews are not available.

The following process improvement initiatives are on-going to help achieve metric results:

- Daily Operating Reviews to identify deviations from the targets for the previous 24 hours and identify countermeasures for continuous improvement.
- Weekly Operating Review meetings weekly to share best practices and review long duration events.
- Provide yearly plastic squeeze training for all Field Service employees as part of Operator Qualification refresher.

- Live action drills to simulate emergency scenarios, practicing isolation procedures and documenting lessons learned.
- Time duration threshold to review incidents during Gas Daily Briefings reduced from >120 to > 90 minutes.
- Dispatching locate and mark representative upon initial discovery to assist in leak location prior to M&C crew arrival.
- Dispatch initiating underground service alerts followed by immediate notification to allow for immediate marking of facilities.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 4.6

UNCONTROLLED RELEASE OF GAS ON

TRANSMISSION PIPELINES

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UNCONTROLLED RELEASE OF GAS ON TRANSMISSION PIPELINES

The material updates to this chapter since the April, 1, 2025 report are identified in blue font.

A. (4.6) Overview

1. Metric Definition

Safety and Operational Metrics (SOM) 4.6 – Uncontrolled Release of Gas on Transmission Pipelines is defined as:

The number of leaks, ruptures, or other loss of containment on transmission lines for the reporting period, including gas releases reported under Title 49 Code of Federal Regulations (CFR) Part 191.3.

2. Introduction of Metric

This metric tracks the total number of Grade 1, 2, and 3 leaks, as well as ruptures and other losses of containment on GT Pipelines which include; Gas Transmission (GT) pipelines and Distribution Service Lines (DSL). Leaks are an important indicator because each leak's uncontrolled flow of gas into the surrounding area can increase the consequence of incidents and cause disruption to our customers' gas service. Leaks are also an important indicator in evaluating the likelihood for where other incidents could occur due to similar criteria or conditions.

3. Audit Results

In the Audit Report, Metric 4.6 received a Metric Accuracy Finding of "None." The Other Findings for this metric include "Data should be pulled after the month closes."[1] This finding has been resolved. Refer to Section B.2 (Metric Performance – Data Collection Methodology) for further explanation.

1 Audit Report, p. 8, Table 1-1.

B. (4.6) Metric Performance

1. Historical Data (2016 – 2021)

Pacific Gas and Electric Company (PG&E) started by reviewing six years of historical data, comprising the years 2016 through 2021. In evaluating the data, PG&E noted changes in detection capabilities and frequency of surveys for the years after 2018. For this reason, the data used to develop these metrics is focused on 2019-2021.

2. Data Collection Methodology

Leak data is managed and pulled by the PG&E Leak Survey Process team. This data is extracted from PG&E's GCM013 report using SAP data. This report aggregates all leaks found during the reporting period including the location, line type, and grade of leak. Original grade is used for the metric criteria because it is not subject to change even if the leak condition or status changes due to regrade, cancelation, or repair.

In addition, transmission incidents reported to Pipeline and Hazardous Materials Safety Administration (PHMSA) that meet the incident reporting definition in CFR 191.3 are considered for metric inclusion. These events may be leaks, ruptures, or other incidents. For each reporting period, PG&E will review any transmission incidents reported to PHMSA and compare against the GCM013 leaks using available information like incident location (Route/MP, latitude/longitude, or street address) and date/time of incident to remove any duplicates between the two datasets.

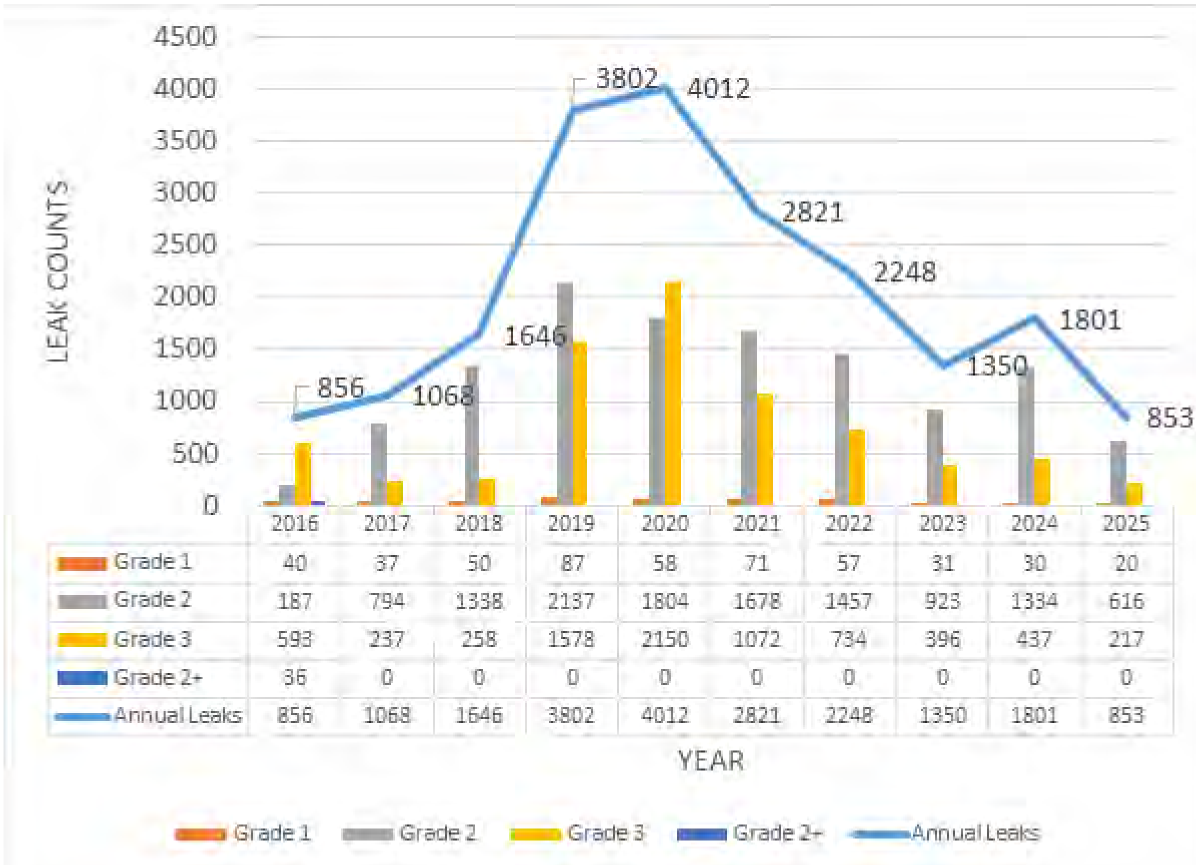
To ensure all transmission leaks from the previous month are reported, the GCM013 tool is executed on at least the 1st business day after the previous month's end to account for that month's leaks thus providing a "snapshot" of the Metric's monthly performance. This improvement was implemented on March 2024 after it was identified by PG&E Internal Audit in February 2024 that pulling the monthly snapshot on the last days of the month could lead to missing leaks for the final days of that month.

In January of the following year, an additional QC is performed. The GCM013 tool is executed to reconcile all of the previous year's leaks. This will account for any missed leaks that may have been added, and any leak notifications that were cancelled after the monthly snapshot(s) were established. This reconciliation is then utilized for the year end reporting period.

3. Metric Performance for the Reporting Period

The annual count of all leaks, ruptures, and loss of containment had been increasing steadily since 2016, with the largest increase seen from 2018 to 2019. This increase is primarily due to a California Air Resources Board (CARB) rule change which requires more frequent leak surveys. The increase has improved visibility and resulted in a larger leak dataset relative to prior years. In March 2017, CARB finalized and approved the Oil and Gas Greenhouse Gas (GHG) Rule codified under California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, "Climate Change," Article 4. Effective January 1, 2018, the GHG Rule covers emission standards, including, but not limited to, stringent leak detection and repair requirements for facilities in certain Oil and Gas sectors. This rule applies to PG&E's underground natural gas storage facilities and GT compressor stations. As a result, PG&E performs a quarterly leak survey at the impacted facilities and performs leak repairs based on CARB's repair timelines. Overall, the 853 leaks found in Quarter 1 and Quarter 2 are trending well below the 2025 target of 3440 unintentional releases. While there was an uptick in the number of leaks found in 2024, compared to the 1350 leaks found in 2023, the proactive maintenance performed, and replacement of components as required by CARB Oil and Gas Rule have contributed to the overall decline in transmission leaks since the high in 2020.

FIGURE 4.6-1
LEAKS BY GRADE TYPE: 2016 – Q2 2025



	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Grade 1	40	37	50	87	58	71	57	31	30	20
Grade 2	187	794	1338	2137	1804	1678	1457	923	1334	616
Grade 3	593	237	258	1578	2150	1072	734	396	437	217
Grade 2+	36	0	0	0	0	0	0	0	0	0
Annual Leaks	856	1068	1646	3802	4012	2821	2248	1350	1801	853

Note: Figure 4.6-1 does not contain the one count of PHMSA gas release reportable incident from March 2025.

C. (4.6) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

There have been no changes to the 1-year and 5-year target methodology since the last SOMs report filing. Applying this methodology, the targets have been updated as described below.

2. Target Methodology

To establish the 1-Year and 5-Year targets, PG&E considered the following factors:

- Historical Data and Trends: The targets are based on annual 1 percent reduction starting with the average of the three years of historical data between 2019-2021. Those three years were used as the timeframe most representative of current leak survey practices.

- Benchmarking: Not available;
- Regulatory Requirements: None;
- Attainable Within Known Resources/Work Plan: Yes;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: Yes, performance at or below the average of the past three years (2019-2021) is a sustainable assumption and allows for non-significant variability; and
- Other Qualitative Considerations: The target also takes into consideration that the results for this metric may fluctuate based on miles of leak surveys performed and changing CARB requirements. The number of leaks found has a correlative relationship to the miles of leak surveys performed and number of components surveyed. While this is a positive impact for risk visibility and mitigation, it can be a driver of varying trends appearing in the results.

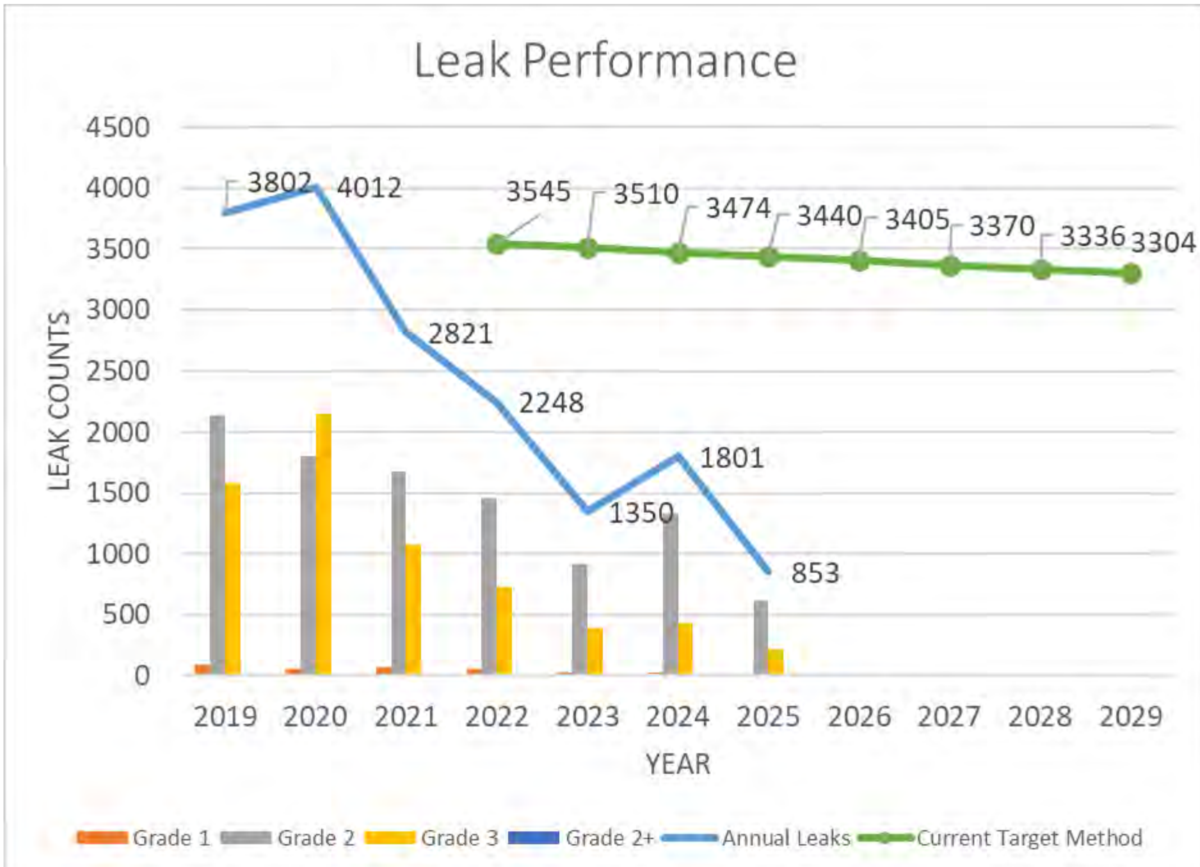
3. 2025 Target

The 2025 target is to maintain performance at or lower than 3,440 leaks, ruptures, or other loss of containment on GT pipelines. This proposed target is based on the baseline of leaks found from 2019-2021 (3,545 leaks, ruptures, or other loss of containment on GT pipelines). A 1 percent annual reduction is then applied to this baseline target which could be impacted by the factors described above (see Figure 4.6-2). This target aligns with our commitment to improved performance from the baseline established from the 2019-2021 results. This target represents an appropriate indicator to signal a review of potential performance issues. Even though the target is set at a performance level higher than 2024 performance, it should not be interpreted as intention to worsen performance.

4. 2029 Target

The 2029 target is to maintain performance at or lower than 3,304 events, which reflects a continued focus on improvement year over year and is based on the factors described above (see Figure 4.6-2).

FIGURE 4.6-2
LEAKS BY GRADE TYPE 2019 – Q2 2025 AND TARGETS THROUGH 2029



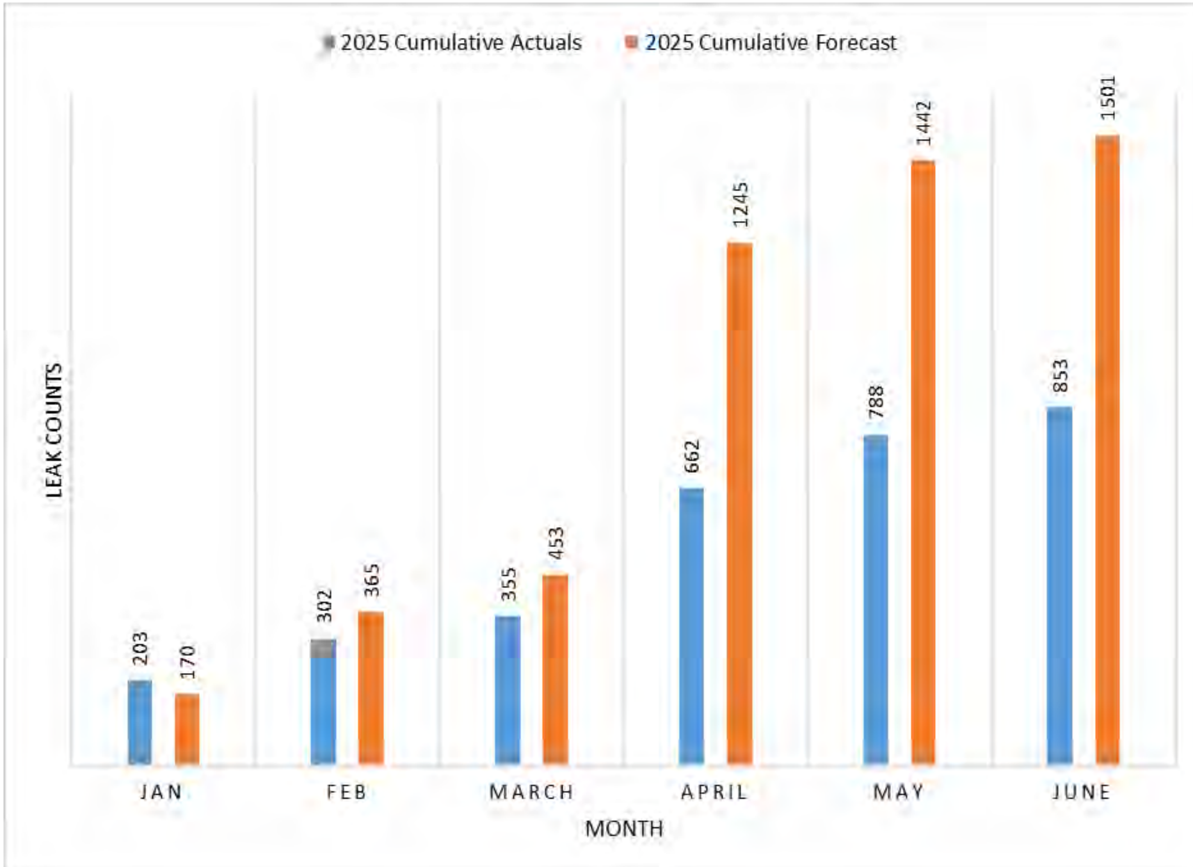
Note: Figure 4.6-2 does not contain the one count of PHMSA gas release reportable incident from March 2025.

D. (4.6) Performance Against Target

1. Maintaining Performance Against the 1-Year Target

Figure 4.6-3 demonstrates that PG&E identified 854 unintended gas release events from January 2025 to June 2025 (853 leaks and 1 PHMSA reportable incident from March 2025), which is about 75 percent below the company's one-year target of 3440 unintended gas release events.

FIGURE 4.6-3
UNCONTROLLED RELEASE OF GAS INCIDENTS FROM JANUARY TO JUNE 2025



Note: Figure 4.6-3 does not contain the one count of PHMSA gas release reportable incident from March 2025.

2. Progress Towards/Deviation From the 5-Year Target

As discussed in Section E, PG&E continues using surveys, assessments, risk mitigation, and its programs to achieve the Company's 5-year performance target.

E. (4.6) Current and Planned Work Activities

The primary programs that support the risk reduction goals of this metric are Transmission Integrity Management and Leak Management.

- <u>Transmission Integrity Management</u>: The Integrity Management Program provides the tools and processes for risk ranking and prioritization of remediation efforts. This program enables PG&E to focus on identifying and remediating threats to its system. The Transmission Integrity Management Program (TIMP) assesses the threats on every segment of transmission pipe, evaluates the associated risks, and acts to prevent or mitigate these threats. The TIMP approach for assessing risk is based on methodologies consistent with American Society of Mechanical Engineers B31.8S and is in compliance with 49 CFR Part 192 Subpart O. Many of PG&E's programs that mitigate, and control transmission pipe asset risks are developed and managed within the TIMP program. Examples of assessments or mitigative work that contribute to reducing or preventing significant incidents include strength testing, inline inspection, direct assessment, direct examination, and pipe replacement.

- Leak Management: The Leak Management Program addresses the risk of Loss of Containment (LOC) by finding and fixing leaks. PG&E performs leak survey of the GT and storage system twice per year, by either ground or aerial methods in accordance with General Order 112-F. Leak surveys of pipeline and equipment are commonly accomplished on foot or vehicle, by operator-qualified personnel, using a portable methane gas leak detector. Aerial leak surveys, in remote locations and areas difficult to access on the ground, are performed by helicopter using Light Detection and Ranging Infrared technology. Additional activities that complement the TIMP include risk-based leak surveys, mobile leak quantification, and replacing/removing high bleed pneumatic devices at compressor stations and storage facilities.
- In-line Inspection (ILI): In-line inspection is the most effective integrity assessment tool for identifying and repairing pipe anomalies whose continued growth could result in loss of containment. To utilize ILI, a pipeline must be upgraded to allow the passage of the ILI tools. PG&E plans on performing ILI upgrades at a pace of 4 upgrades per year. At the end of 2024, PG&E has 58 percent of the GT system capable of ILI. Work during the 2023 rate case period will contribute to PG&E's overall goal of upgrading the system so that 65 percent of PG&E's GT pipeline miles, are capable of ILI by end of 2038. None of the DSL pipe mileage that was transferred out of GT per TransDef is piggable via traditional ILI methods, and is not planned for future pigging upgrades.
- External Corrosion Direct Assessment (ECDA): PG&E expects to conduct ECDA indirect inspections on approximately 268 miles of transmission pipeline in HCAs during the 2023-2026 rate case period. ECDA indirect

inspections assess the cathodic protection and coating condition of pipelines to identify locations for direct examinations of the pipeline. These inspections and direct examinations inform mitigations needed to enhance cathodic protection and ensure external corrosion and the resulting leaks are minimized.

- Close Interval Survey: PG&E also has a Close Interval Survey (CIS) Program targeted at monitoring the effectiveness of the transmission pipelines' cathodic protection (CP) systems by reading the CP levels between the annual monitoring locations. This program annually assesses 3-10 percent of PG&E's gas transmission pipelines. Assessing the levels of CP between test points provides increased confidence that the readings obtained at test stations reflect conditions along the entire system and enable PG&E to make CP adjustments where CIS indicates additional CP is warranted. CIS is recognized as a best practice to assess CP along the entire pipeline, verify electrical isolation, and identify potential interference gradients that may compromise the integrity of the system.
- Strength Testing: Strength tests reduce significant loss of containment incidents like ruptures by confirming the integrity of a pipeline at its Maximum Allowable Operating Pressure (MAOP). They are conducted as a qualifying test for MAOP reconfirmation and for integrity assessments when:
  - Class location changes.
  - A section of pipe lacks a Traceable, Verifiable, and Complete (TVC) record of a test that supports the MAOP, per 192.624 and PUC 958; or
  - As an integrity assessment to verify pipeline integrity.

  Currently, approximately 88 percent of PG&E's GT pipelines have a TVC strength test. For the pipelines lacking TVC records, PG&E is prioritizing the pipelines in HCAs, MCAs, Class 3 and 4 in order to meet the 2028 and 2035 compliance dates specified in 192.624. After these compliance dates are met, PG&E will work to complete the remaining transmission pipelines required by PUC 958.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 4.7

TIME TO RESOLVE HAZARDOUS CONDITIONS

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TIME TO RESOLVE HAZARDOUS CONDITIONS

The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (4.7) Overview

1. Metric Definition

Safety and Operational Metric (SOM) 4.7 – Time to Resolve Hazardous Conditions (TRHC) is described as:

Median response time to resolve Grade 1 leaks. Time starts when the utility first receives the report and ends when a utility's qualified representative determines, per the utility's emergency standards, that the reported leak is not hazardous or the utility's representative completes actions to mitigate a hazardous leak and render it as being non-hazardous (i.e., by shutting-off gas supply, eliminating subsurface leak migration, repair, etc.) per the utility's standards.

The data used to determine the Median Time shall be provided in increments as defined in General Order 112-F 123.2 © as supplemental information, not as a metric.

2. Introduction of Metric

The measurement of TRHC captures the duration of time required to mitigate hazardous gas leak conditions. These leak conditions are associated with the public safety risk of loss of containment on Gas Distribution Main or Service. Performance aims for faster resolution times as a measure of prevention resulting in lower risk of an incident impacting public safety and minimized interruption to the gas business and customers. It is imperative that we promptly and effectively resolve any hazardous conditions on our distribution network while balancing timeliness, customer outages, and employee safety. Long duration blowing gas events have the potential to negatively impact public safety if an ignition source is present, as well as it poses a risk if migration into sub-surface structures occurs.

3. Audit Results

In the Audit Report, Metric 4.7 received a Metric Accuracy Finding of "None." There were no Other Findings for this metric.[1]

B. (4.7) Metric Performance

1. Historical Data (2018 – June 2025)

Historical data for TRHC Grade 1 Leaks metric is available for 2018 – Q2 2025. The data captures the time that a qualified first responder requires to respond and stop gas flow due to Grade 1 leaks. This data includes leaks identified in our distribution system and includes all facility types, i.e., customer facilities, service and main pipelines, meters, regulator stations, service risers, valves. It includes leaks identified by Pacific Gas and Electric Company (PG&E) personnel only and with a final resolution of leak repaired.

Before 2014, PG&E used a decentralized emergency process to manage emergencies (i.e., each division used its own resources like mappers, planners, among others to track and manage emergencies). Similarly, support organizations like Dispatch, Mapping and Planning used their own management tools to help schedule and manage emergency information. Dispatch used a management tool called Outage Management that recorded times at various stages of the process (i.e., when the emergency call came in, when the Gas Service Representative arrived at the site, when the leak was isolated, etc.). The Distribution Control Room used a tool called Gas Logging System to record incoming information.

In 2014, a centralized process was implemented to allow Distribution, Transmission, Dispatch, Planning and Mapping personnel to be co located and work together as a team to manage emergencies. This centralized process also allowed the development of the Event Management Tool (EMT) system which was implemented in 2018.

PG&E started tracking gas flow stop times for Grade 1 leaks in 2018 although this has not been a mandatory requirement, except when the

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[1] Audit Report, p. 8, Table 1-1.

incident is California Public Utilities Commission or Department of Transportation reportable.

2. Data Collection Methodology

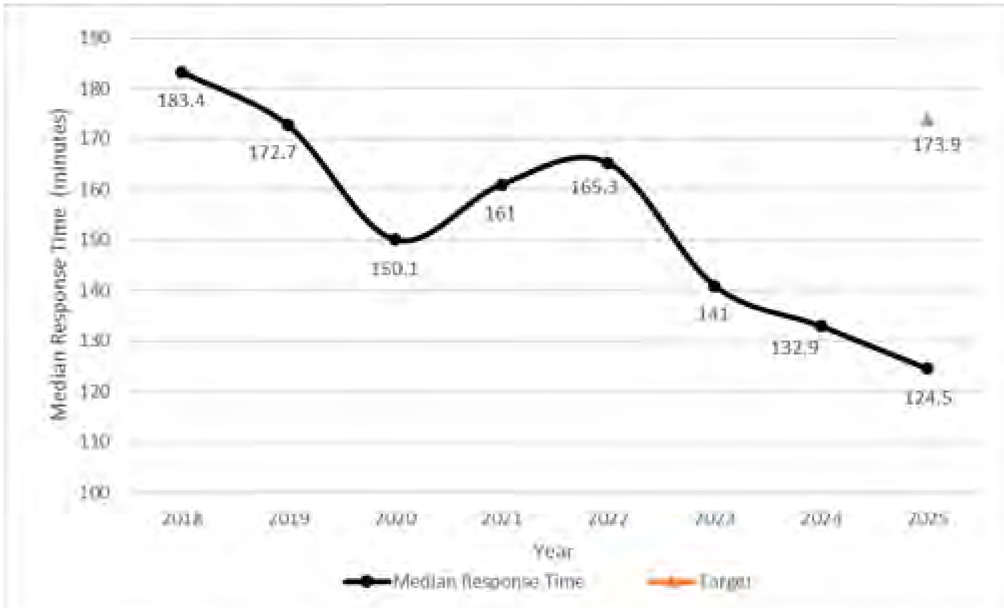
The EMT is currently used as the official system to track gas emergencies from start to finish. The EMT provides access to latest information on an incident. All emergency data is consolidated and stored in one place.

The EMT is used by Dispatch and Gas Distribution Control Center teams to create emergency events and collect incident information. It also allows us to run reports and retrieve historical information. There are distinct types of incidents recorded in the EMT: explosions, corrosion, cross bore, pipe damage, dig-ins, evacuations, exposed pipe—no gas leak, fires, gas leaks (including Grade 1), high concentration areas, Hi/Lo pressures, material failure, pipe ruptures, vehicle impacts, among others. No transmission events are included in the metric.

3. Metric Performance for Reporting Period

The range of data available to calculate the historical TRHC for Grade 1 leaks is from 2018 to Q2 2025. In this timeframe, performance improved significantly, decreasing from 183.4 minutes in 2018 to 124.5 minutes through Q2 2025. The performance in 2025 represents a 6.3 percent improvement over the performance of 132.9 minutes in 2024. This improvement is due to strategically prearranging construction crews in locations with high frequency of Grade 1 leaks after business hours and weekends, understanding root causes for long shut-in time incidents, sharing best practices system wide during weekly performance review calls, and improved partnership between Field Service and Maintenance and Construction (M&C) organizations.

FIGURE 4.7-1
TIME TO RESOLVE HAZARDOUS CONDITIONS MEDIAN RESPONSE TIME
2018-Q2 2025



C. (4.7) 1-Year Target and 5-Year Target

1. Updates to 1- and-5-Year Targets Since Last Report

The 2025 target is set as the average of the annual median times the past 7-years (2018-2024) + 10 percent. The 2029 target demonstrates a continued focus on improvement by reducing an additional 0.5 minutes each subsequent year.

2. Target Methodology

To establish the 1-year and 5-year targets, PG&E considered the following factors:

- Historical Data and Trends: As of 2024, the target was based on the average of the 2018-2021 historical data, plus 10 percent. Starting in 2025, the target is based on the average of the 2018-2024 historical data, plus 10 percent. The seven-year period is being used to include recent performance. The seven-year period was used because 2018 is the first year of available historical data. The use of 10 percent allows for non-significant variability, as well as unknown variability given that this is a new metric that has not been well measured and tracked in the past.

- Benchmarking: Not available;
- Regulatory Requirements: None;
- Attainable Within Known Resources/Work Plan: Yes;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: Yes, performance at or below the average of the 2018-2024 period, plus 10 percent, is a sustainable assumption for maintaining the improvement from 2018-2024 time-frame, plus room for non-significant variability and other unknown variables; and
- Other Qualitative Considerations: This is a new metric to PG&E that has not yet been closely tracked or well understood.

3. 2025 Target

The 2025 target is to maintain performance at or lower than 173.9 minutes based on the factors described above. 2025 target is the average of the annual median times the past 7-years (2018-2024) + 10 percent. This target aligns with our commitment to the safe operations of our assets. This target represents an appropriate indicator light to signal a review of potential performance issues. Target should not be interpreted as intention to worsen performance.

4. 2029 Target

The 2029 target is to maintain performance at or lower than 171.9 minutes based on the factors described above along with stepped improvement of 0.5 minutes year-over-year.

D. (4.7) Performance Against Target

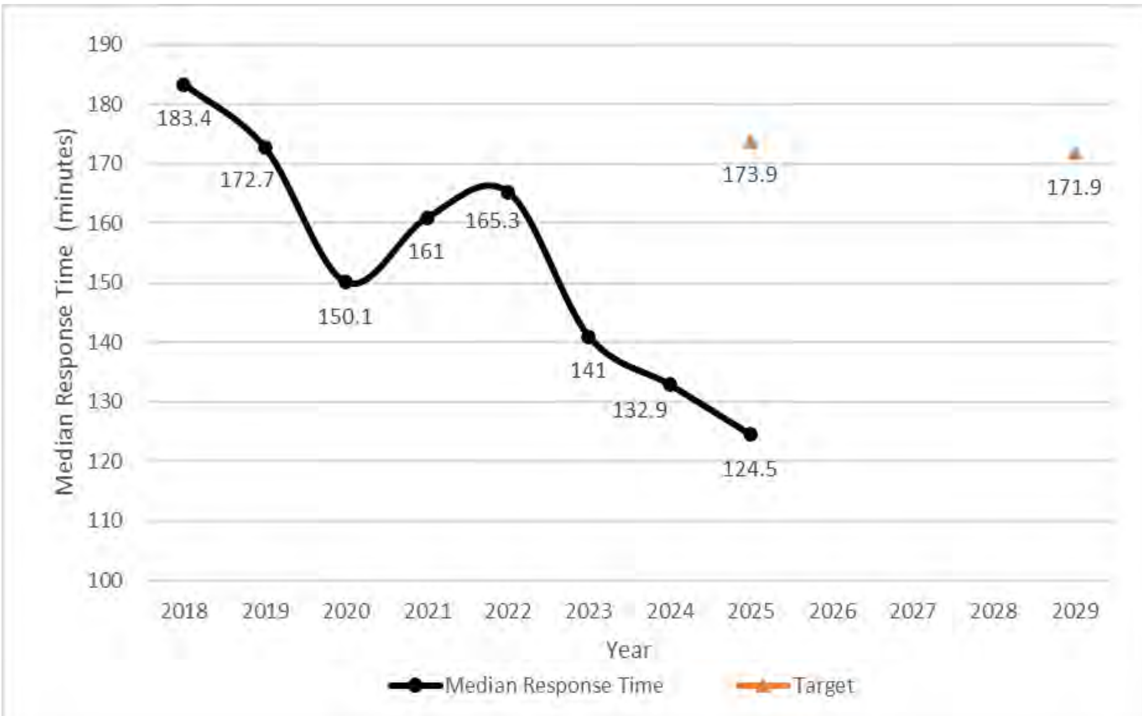
1. Maintaining Performance Against the 1-Year Target

As demonstrated in Figure 4.7-2, PG&E saw a median response time of 124.5 minutes in 2025 which is better than the Company's one-year target.

2. Maintaining Performance Against the 5-Year Target

As discussed in Section E, PG&E will continue mitigating the risk of loss of containment on Gas Distribution Mains and Services and employing its various programs to maintain performance in its efforts toward its five-year target.

FIGURE 4.7-2
TIME TO RESOLVE HAZARDOUS CONDITIONS MEDIAN RESPONSE TIME
2018-Q2 2025 AND
TARGETS FROM 2025 AND 2029



E. (4.7) Current and Planned Work Activities

Starting in 2022, PG&E is applying the definition as stated in Decision 21-11-009 to existing data for further visibility. There are on-going efforts in place to ensure traceable and verifiable data. PG&E plans to implement SAP controls to ensure that Field Service and M&C personnel are capturing this data at each occurrence. This will drive visibility into the metric to allow for performance management. This metric will continue to mitigate the risk of loss of containment on Gas Distribution Main or Service by reducing distribution pipeline rupture with ignition.

The metric is supported by the following programs which focus on improving public safety: Field Services and Gas M&C.

- Gas Field Service: Field Service responds to gas service requests, which include investigation reports of possible gas leaks, carbon monoxide monitoring, customer requests for starts and stops of gas service, appliance pilot re-lights, appliance safety checks, as well as emergency situations as first responders.

- Gas M&C: Gas M&C performs routine maintenance of PG&E's gas distribution facilities, which includes emergency response due to dig-ins, as well as leak repairs.

The following process improvement initiatives are on-going to help achieve metric results:

- Daily Operating Reviews to identify deviations from the targets for the previous 24hrs and identify countermeasures for continuous improvement;
- Weekly Operating Review meetings to share best practices and review long duration events;
- Provide yearly plastic squeeze training for all Field Service employees as part of Operator Qualification refresher;
- Live action drills to simulate emergency scenarios, practicing isolation procedures and documenting lessons learned;
- Other pilot initiatives completed in 2025:
  - Piloting process to auto dispatch notification to Gas M&C Superintendent if a grade 1 leak gas flow repair activities extend over 400 minutes; and
  - Piloting process for General Construction crews to provide emergency support when Division M&C Crews not available due to rest period (pilot in San Jose, Fresno, and Bakersfield).

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 5.1

CLEAN ENERGY GOALS COMPLIANCE METRIC

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 5.1
CLEAN ENERGY GOALS COMPLIANCE METRIC

TABLE OF CONTENTS

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 5.1
CLEAN ENERGY GOALS COMPLIANCE METRIC

The material updates to this chapter since the April 1, 2025 report are identified in blue font.[1]

A. (5.1) Overview

1. Metric Definition

Safety and Operational Metric 5.1 – Clean Energy Goals Compliance Metric is defined as:

Progress towards Pacific Gas and Electric Company's (PG&E) procurement obligations as adopted in Decision (D.) 21-06-035, D.19-11-016 and any subsequent decision(s) in Rulemaking (R.) 20-05-003, or a successor proceeding, updating these requirements.

2. Introduction to the Clean Energy Goals Compliance Metric

The Clean Energy Goals Compliance Metric (CEG Metric) directs PG&E to report on its progress towards meeting the procurement obligations in the following California Public Utilities Commission (Commission) decisions: (1) D.19-11-016, (2) D.21-06-035, and (3) D.23-02-040 (together, the Integrated Resource Planning (IRP) Decisions).[2]

In November 2019, the Commission issued D.19-11-016 in part to address near-term system reliability concerns beginning in 2021. D.19-11-016 requires incremental procurement of system-level Resource Adequacy (RA) capacity of 3,300 megawatts (MW) by all

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1 Consistent with the confidentiality of 2025 data in PG&E's IRP Compliance Filing filed June 2, 2025, there are no updates to the underlying data for this chapter from PG&E's Safety and Operational Metrics Report filed April 1, 2025. Data from 2025 will be included in PG&E's Safety and Operational Metrics Report to be filed March 31, 2026.

2 See D.22-02-004 directing PG&E to make progress towards procuring a 95 MW 4-hour energy storage project at the Kern-Lamont substation and a 50 MW 4-hour energy storage project at the Mesa substation, pp. 160-162; Ordering Paragraph (OP) 13 of D.22-02-004 exempts these energy storage projects from the Clean Energy Goals Compliance Metric.

Commission-jurisdictional Load-Serving Entities (LSE).[3] In line with state policy goals, the Commission also expressed a preference that LSEs pursue "preferred resources" such as new clean electricity capacity.[4] Of the 3,300 MW procurement order, PG&E is directed to procure 716.9 MW of RA capacity on behalf of its bundled service customers with online dates between the years 2021-2023.[5]

D.19-11-016 also allowed each non-investor-owned utility (non-IOU) LSE an opportunity to "opt-out" of its procurement obligation and required notification to the Commission in February 2020 to exercise this option. On April 15, 2020, the Commission issued a ruling increasing PG&E's procurement obligation by 48.2 MW, to an aggregated total of 765.1 MW, to account for LSE opt-outs.[6] PG&E is required to procure the 765.1 MW with the following online dates: 50 percent (382.6 MW) by August 1, 2021, 25 percent (191.3 MW) by August 1, 2022, and 25 percent (191.3 MW) by August 1, 2023.[7]

On July 29, 2022, PG&E filed supplemental Advice Letter (AL) 6654-E-A, discussing the fact that three "opt-out" LSEs ceased serving customers in California. As stated in AL 6654-E-A, PG&E consulted with the Commission's Energy Division, and it was determined that the total opt-out procurement obligation assigned to these three LSEs is 1.2 MW. As set forth in D.22-05-015, in the event of an "LSE bankruptcy, or any other exit from the market," any associated costs attributable to the opt-out procurement shall be allocated to the traditional cost allocation mechanism (CAM). On January 12, 2023, the Commission adopted Resolution (Res. E-5239 and clarified that the 1.2 MW of procurement that PG&E conducted on behalf of opt-out LSEs that subsequently ceased serving

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3 D.19-11-016, p. 34.

4 D.19-11-016, Conclusion of Law (COL) 22.

5 D.19-11-016, OP 3.

6 See Administrative Law Judge's Ruling Finalizing Load Forecasts and GHG Benchmarks for Individual 2020 IRP Filings and Assigning Procurement Obligations Pursuant to D.19-11-016, issued on April 15, 2020, p. 11.

7 Due to rounding, numbers presented throughout this chapter may not add up precisely to the totals provided.

customers will continue to count towards PG&E's procurement obligation under D.19-11-016.[8]

In June 2021, the Commission issued D.21-06-035 to address the mid-term (period of 2023-2026) reliability needs of the electric grid and to help achieve the state's greenhouse gas (GHG) emissions reduction targets. In the decision, the Commission ordered 11,500 MW of incremental resource procurement exclusively from zero-emitting resources, unless the resource otherwise qualifies under California's Renewables Portfolio Standard eligibility requirements.[9] Of this total, PG&E is required to procure 2,302 MW with the following online dates: 400 MW by August 1, 2023; 1,201 MW by June 1, 2024; 300 MW by June 1, 2025; and 400 MW by June 1, 2026. In addition, D.21-06-035 also required that 900 MW (of PG&E's 2,302 MW) have specific operational characteristics to spur the development of long-duration energy storage, increase the availability of firm clean energy, and serve as a replacement source of clean energy for the retiring Diablo Canyon Power Plant.[10]

In February 2023, the Commission issued D.23-02-040 which requires incremental procurement of system-level capacity of 4,000 MW by all LSEs to address projected increases in electric demand, increasing impacts of climate change, the likelihood of additional retirements of fossil-fueled generation, and the likelihood that delays beyond 2026 of long-duration energy storage and firm clean energy (collectively, long lead-time resources) required under D.21-06-035 will be necessary. Of this total, PG&E is required to procure 777 MW with the following online dates: 388 MW by June 1, 2026; and 388 MW by June 1, 2027. The decision also revised the online dates of long lead-time resources from June 1, 2026, to June 1, 2028, for all Commission-jurisdictional LSEs.

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8 Res.E-5239, p. 11.

9 D.21-06-035, OP 1.

10 *Id*., pp. 35-36; See also D.21-06-035, p. 56 requiring PG&E to procure 500 MW of zero-emitting resources by June 1, 2025, and 400 MW of long lead-time resources by June 1, 2026.

In aggregate, to date, the total amount of PG&E's procurement ordered under the IRP Decisions is 3,844.1 MW with online dates between 2021-2028. Table 1 outlines PG&E's procurement obligation for each year.

TABLE 5.1-1
PG&E'S TOTAL PROCUREMENT OBLIGATION PURSUANT TO THE IRP DECISIONS
(PRESENTED AS MW OF NET QUALIFYING CAPACITY (NQC))

Line No.	Online Date	D.19-11-016	D.21-06-035	D.23-02-040	Total
1	8/1/2021	382.6			382.6
2	8/1/2022	191.3			191.3
3	8/1/2023	191.3	400		591.3
4	6/1/2024		1,201		1,201
5	6/1/2025		300		300
6	6/1/2026			388	388
7	6/1/2027			388	388
8	6/1/2028		400		400
9	Total	765.1	2,302	777	3,844.1

3. Background on Net Qualifying Capacity

For the purpose of assessing whether an LSE's procurement obligation has been met in accordance with the IRP Decisions, the Commission uses capacity counting rules based on the Commission's RA Program and the results of effective load carrying capability (ELCC) modeling by consultants E3 and Astrapé.[11] The counting rules are generally expressed as a percentage that is applied to the nameplate capacity of the procured resource. For example, a 4-hour energy storage resource with a nameplate capacity of 100 MW can count 90.7 MW towards an LSE's 2024 requirement (100 MW * 90.7 percent ELCC = 90.7 MW of NQC). PG&E's procurement progress in this report is presented as MW of NQC based on the applicable counting rules and guidance provided by the Commission.[12]

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11 See D.21-06-035, p. 71 and D.23-02-040, pp. 28-29.

12 See the Incremental ELCC Study for Mid-Term Reliability Procurement (January 2023 Update), p. 10 at: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/20230210_irp_e3_astrape_updated_incremental_elcc_study.pdf; See also the Staff Memo on Incremental ELCC to be Used for Mid-Term Reliability Procurement (D.21-06-035) at: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2023-02-irp_mtr_elccs-public_transmittal_memo_v1.pdf.

4. Audit Results

In the Audit Report, Metric 5.1 received a Metric Accuracy Finding of "None." There were no Other Findings for this metric.[13]

B. (5.1) Metric Performance

1. Historical Data

Pursuant to the IRP Decisions, resource procurement obligations and compliance milestones began in 2021. The projects pertaining to PG&E's resource procurement obligations and compliance milestone date requirements of August 1, 2021, August 1, 2022, and August 1, 2023 have all achieved commercial operation.

Starting in 2024, the compliance milestone date for resources to be online by was set to June 1 per D.21 06 035. For the procurement milestone of June 1, 2024, PG&E had originally procured 2,685 MW to meet its 2,366.1 MW obligations. However, project development delays resulted in PG&E being unable to meet the June 1 compliance milestone date by 33.3 MW. As of the release of this report, all but two projects that were contracted to be online by June 1, 2024 are online.

TABLE 5.1-2
PG&E'S HISTORICAL METRIC PERFORMANCE (MW OF NQC)

Line No.	Online Date	Total Procurement Obligation	Actual Procured Capacity
1	8/1/2021	382.6	418.2
2	8/1/2022	573.8	585.2
3	8/1/2023	1,165.1	1,165.2
4	6/1/2024	2,366.1	2,332.8

13 Audit Report, p. 8, Table 1-1.

FIGURE 5.1-1
PG&E'S HISTORICAL METRIC PERFORMANCE (MW OF NQC)

PG&E relies upon three main sources of available data to monitor its procurement progress toward the IRP Decisions: (1) the baseline list of resources used to establish the procurement targets, (2) Commission rules and guidance on determining the MW of NQC, and (3) PG&E's internal database containing all of its energy procurement contracts approved by the Commission.

1) Baseline List of Resources: In establishing the procurement targets in the IRP Decisions, the Commission established baseline assumptions of resources available to meet system reliability needs. LSEs must demonstrate that the MW of NQC of the procured resource, new and/or existing, are incremental to the Commission's baseline assumptions.[14] PG&E uses this information to ensure resources are eligible to count towards its procurement obligations.

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14 See the Commission's baseline assumptions at: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/20200103_procurement_baseline_list.xlsx (D.19-11-016) and https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/d2106035_baseline_gen_list_20220902.xlsx (D.21-06-035).

2) Commission Rules and Guidance on MW of NQC: As described above, the amount of MW of NQC that can be used to count towards an LSE's procurement obligation is based on the Commission's rules and guidance. PG&E uses this information to determine the amount of MW of NQC that is eligible to count towards its procurement obligations.

3) PG&E's Internal Database: This database contains PG&E's energy procurement contracts approved by the Commission, including procurement contracts to meet PG&E's procurement obligations under the IRP Decisions. The data contained in this database is consistent with the procurement contracts and respective ALs filed for Commission approval.

2. Data Collection Methodology

As described above, PG&E uses the baseline list of resources and the Commission's rules and guidance on MW of NQC to monitor its procurement progress.[15]

3. Metric Performance for Reporting Period

PG&E procured sufficient incremental MW of NQC to meet and exceed its procurement obligations for incremental capacity with online dates in 2024 pursuant to D.19-11-016 and D.21-06-035.[16] However, due to project development delays, as further explained in section D.1, when possible PG&E procured bridge resources to replace delayed resources on a monthly basis beyond the June 1, 2024 online obligation date.

PG&E notes that the Commission stated that procurement:

> …amounts [that] are in excess of [an] LSE's obligation under D.19-11-016…may be counted toward the capacity requirements [in D.21-06-035] if they otherwise qualify.[17]

Moreover, D.21-06-035 stated that the Commission:

> …will allow LSEs to show procurement that they have conducted to support the Commission's orders or requirements in the context of the

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15 See the information maintained by the Commission at: https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/long-term-procurement-planning/more-information-on-authorizing-procurement/irp-procurement-track.

16 PG&E's ALs 5826-E, 6033-E, 6289-E, and 6477-E.

17 D.21-06-035, p. 80.

RPS program, as well as for emergency reliability purposes in R.20-11-003, as compliance toward the requirements herein.[18]

Accordingly, PG&E estimates that approximately 262 MW of NQC of its procurement toward the procurement for both D.19-11-016 and R.20-11-003 that have been approved by the Commission, and that are in excess of what is required by each of those decisions, may be applied towards its procurement obligations under D.21-06-035.[19]

On January 21, 2022, PG&E filed AL 6477-E requesting Commission approval of nine agreements resulting from PG&E's Mid-Term Reliability Phase 1 solicitation to meet its procurement obligations under D.21-06-035. These agreements total 1,434 MW of NQC and have been approved by the Commission.[20] Subsequently, unprecedented market upheavals affected the economic and commercial viability of several of the projects comprising of these nine agreements.[21] This unexpected market challenge posed a risk of project failures for all LSEs in the market procuring resources toward the IRP Decisions, including PG&E. As a result, to maintain the commercial viability of the projects, PG&E negotiated amendments for four of the nine projects. Amendments were presented to the Commission for approval on September 23, 2022. The Commission approved these amendments on December 1, 2022.[22]

On January 13, 2023, PG&E filed AL 6825-E, on February 14, 2023, PG&E filed AL 6861-E, and on September 13, 2023, PG&E filed AL 7022-E, requesting Commission approval of four additional agreements resulting from PG&E's Mid-Term Reliability Phase 2 solicitation to further meet its

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18 *Id*.

19 PG&E's AL 6289-E.

20 On April 21, 2022, the Commission adopted Res.E-5202 approving the nine agreements without modification as filed in PG&E's AL 6477-E.

21 For example, on July 20, 2022, PG&E filed AL 6658-E, requesting approval of contract amendments for the AMCOR and the North Central Valley projects after each developer described external barriers to completing their projects in line with their existing contract obligations.

22 PG&E's AL 6711-E.

procurement obligations under D.21-06-035. These agreements have been approved by the Commission.[23]

Despite the significant unprecedented market challenges PG&E has made steady progress towards achieving its procurement obligations under D.21-06-035.

As stated above, D.21-06-035 requires that 900 MW of NQC (of PG&E's 2,302 MW of NQC) have specific operational characteristics. Specifically, PG&E is directed to procure 500 MW of NQC of firm zero-emitting resources with online dates by June 1, 2025, and 400 MW of NQC of long lead-time resources with online dates by June 1, 2028.[24] PG&E issued its Mid-Term Reliability Phase 3 solicitation on February 7, 2023 to solicit additional resources toward fulfilling all of its procurement obligations under D.21-06-035, including, the 900 MW of NQC with specific operational characteristics.

On February 27, 2024, PG&E filed AL 7177-E, and on September 9, 2024, PG&E filed AL 7356-E, requesting Commission approval of five agreements resulting from PG&E's Mid-Term Reliability Phase 3 solicitation. These agreements have been approved by the Commission.[25] Additionally, on June 18, 2024, PG&E filed AL 7299-E and on November 4, 2024, PG&E filed AL 7420-E requesting approval of four agreements from the Mid-Term Reliability Phase 3 solicitation. These agreements are currently pending at the Commission. PG&E issued a Long Lead Time solicitation on October 15, 2024, to purchase 200 MW of Long Duration Energy Storage projects and 200 MW of Firm Zero-Emitting projects as directed by D.21-06-035. On July 16, 2025, PG&E filed AL 7648-E

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23 On April 27, 2023, the Commission adopted Res.E-5262 and Res.E-5263 approving PG&E's AL 6825-E and AL 6861-E. On January 11, 2024, the Commission adopted Res.E-5297 approving AL 7022-E.

24 The long lead-time (LLT) resources are comprised of: (1) firm zero-emitting generation with a capacity factor of at least 80 percent and (2) long-duration storage resources defined as having at least eight hours of duration.

25 On June 4, 2024, the Commission adopted Res. E-5325 approving PG&E's AL 7177-E and on February 20, 2025, the Commission adopted Res. E-5370 approving PG&E's AL 7356-E.

requesting Commission approval of one agreement resulting from this solicitation.

C. (5.1) 1-Year Target and 5-Year Target

1. Updates to 1-Year Target and 5-Year Target Since Last Report

The 1-year target has been updated to reflect PG&E's required procurement for 2025 under the IRP Decisions which is to procure 2,666.1 MW of cumulative NQC by June 1, 2025, as outlined in Table 5.1-1. The 5-year target has also been updated to reflect PG&E's additional procurement requirements, as outlined in Commission decision—D.23-02-040—issued in February 2023.[26] As summarized in Table 5.1-1, the 5-year target for 2029 remains the same as the 2028 target, which is to procure 3,844.1 MW of cumulative NQC by June 1, 2028. However, on May 30, 2025, PG&E filed AL 7605-E to request an extension to the online date requirement for the LLT resources pursuant to D.24-02-047 OP 16(b) If granted, the extension when coupled with adherence with D.25-09-007 (described below), would meet compliance with the target from June 1, 2028, until the approved extended online date.

2. Target Methodology

To establish the 1-year and 5-year targets, PG&E considered the following factors:

- Historical Data and Trends: Not Applicable;
- Benchmarking: Not applicable;
- Regulatory Requirements: The targets are set to match the cumulative procurement obligations set forth in the IRP Decisions;
- Attainable Within Known Resources/Work Plan: Yes;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: Yes;
- Other Considerations:
  - The target approach was established to meet the Commission's current procurement obligations. PG&E's procurement obligation may increase if other LSEs fail to meet their procurement

[26] D.23-02-040, p. 31.

obligations and PG&E is ordered by the Commission to make back-stop procurement on their behalf;[27] and

- The ability for procured capacity to actually come online by established contractual online dates can be impacted by external factors, as has occurred recently due to impacts of the COVID-19 pandemic, significant and unprecedent market challenges, supply chain disruptions and the Department of Commerce's investigation into potential solar module tariff circumvention.[28]

3. 2025 Target

The 1-year target for the CEG Metric is to procure 2,666.1 MW of cumulative NQC with an online date by June 1, 2025, which is equal to the cumulative procurement obligations for 2021, 2022, 2023, 2024, and 2025 as outlined in Table 5.1-1.

4. 2029 Target

The Integrated Resource Plan Decisions does not have a 2029 obligation to align with a new 5-year target for the CEG Metric. Therefore, the current target remains to procure 3,844.1 MW of cumulative NQC with an online date by June 1, 2028, which is equal to the cumulative procurement obligations for 2021-2028 as outlined in Table 5.1-1. However, given market and development challenges to procuring capacity from resources qualified to meet the 2028 obligations as the IRP Decisions require, PG&E requested an extension via AL 7608-E on May 30, 2025. If granted, the extension would allow up to 400 MW of Long Lead Time resources to be procured with a 2031 online date, instead of a 2028 online date, as long as PG&E also adheres to D.25-09-007 (described below), and the 2029 target would remain at 3,844.1 MW.

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[27] D.19-11-016, p. 67.

[28] Erne, David, Mark Kootstra. 2023. Final Draft Diablo Canyon Nuclear Power Plant Extension – CEC Analysis of Need to Support Reliability. California Energy Commission. Publication Number: CEC-200-2023-004.

D. (5.1) Performance Against Target

1. Progress Towards the 1-Year Target

PG&E executed contracts for sufficient incremental capacity with online dates on or before June 1, 2025, to meet the 1-tear target. However, counterparties have cited ongoing supply chain disruptions, interconnection delays, and permitting delays as impacting project development schedules and their ability to meet contractual online dates. As impacts to project online dates were identified, PG&E procured bridge resources, as permitted in D.21-06-035 and D.23-02-040, to mitigate against project online date delays[29]

2. Progress Towards the 5-Year Target

PG&E continues to make progress towards meeting the 5-year target. Within this overall procurement target, PG&E has a requirement to procure 900 MW of NQC with specific operational characteristics and the Commission decision for supplemental mid-term procurement as outlined above. In September 2023, PG&E filed for approval of one contract that is expected to count towards the operational characteristics as a Zero-Emitting Resource. Additionally, in June 2024, PG&E filed for approval of two renewable generation contracts which are expected to be contractually paired with an energy storage resource to count towards the operational characteristics as a Zero-Emitting Resource.

PG&E reiterates, and as outlined above, that developers and LSEs have experienced significant and unprecedented market challenges, increases in component prices, continued supply chain constraints, and industry-wide inflation on total project costs that have hindered the ability for developers to bring projects online by their contractual online dates.[30] In recognition of these challenges, the Commission provided mitigation tools in D.23-02-040,D.24-02-047, and D.24-09-006 for LSEs to continue making progress towards their procurement obligations to ensure system reliability

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[29] See footnote 1.

[30] Erne, David, Mark Kootstra. 2023. Final Draft Diablo Canyon Nuclear Power Plant Extension – CEC Analysis of Need to Support Reliability. California Energy Commission. Publication Number: CEC-200-2023-004.

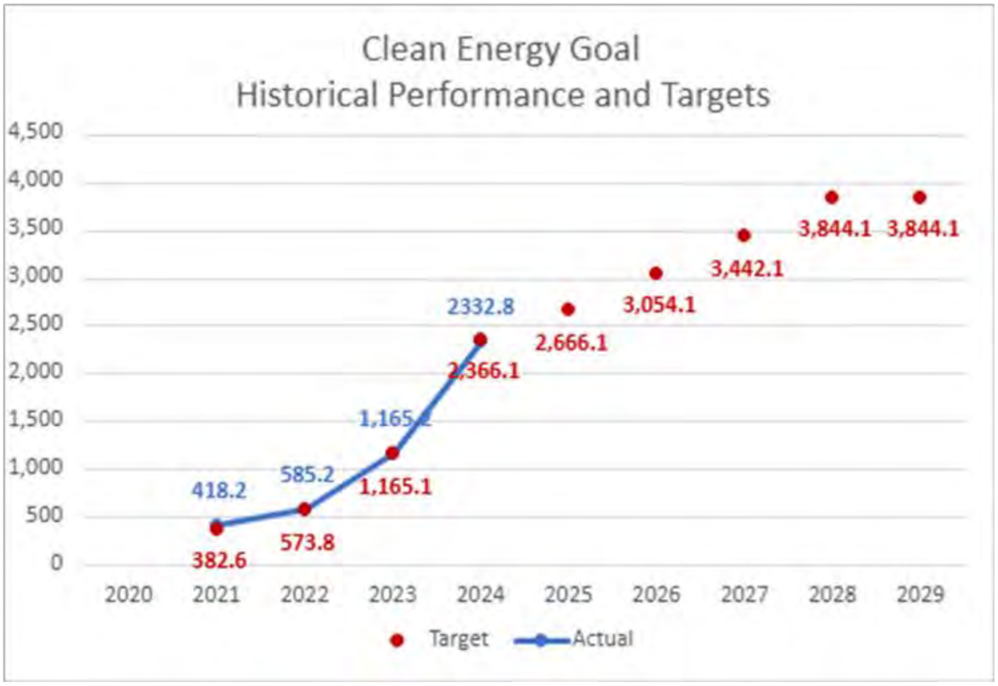
in the mid-term. These mitigation tools include extending the online date of long lead-time resources from 2026 to 2028, allowing LSEs to request for a further extension for long lead-time resources until 2031 for cost considerations or projects with later online dates, allowing the use of bridge resources and, in some cases, re-contracting with resources that are retiring or have expiring or expired contracts.[31]

Additionally, on September 18, 2025, the Commission approved D.25-09-007, which granted with modifications Southern California Edison Company's Petition for Modification of D.23-02-040 and D.24-02-047 filed on March 21, 2025. D.25-09-007 eliminated the option for LSEs to use bridge contracts as an alternative compliance mechanism going forward, given the high cost and lack of short-term reliability benefits such bridge contracts provide, and established that LSEs will be deemed compliant with their D.21-06-035 and D.23-02-040 (as modified by D.24-02-047) if they can show that: (1) they have sufficient executed long-term (ten years or more) contracts (for capacity and/or energy, as applicable) to meet the applicable procurement obligation; and (2) they have met their month-ahead system resource adequacy obligations for all months in which their procurement is delayed, by the final deadline for curing any resource adequacy deficiency.

PG&E will continue to work with developers and the Commission to address the challenges noted above in order to meet the current 5-year target, and any additional procurement requirements in support of the state's reliability needs.

31 D.23-02-040, COLs 7 and 12. D.24-02-047, OPs 16 and 19. D.24-09-006, OP 1.

FIGURE 5.1-2
PG&E'S CLEAN ENERGY GOAL HISTORICAL PERFORMANCE AND TARGETS (MW OF NQC)



E. (5.1) Current and Planned Work Activities

Below is a summary description of the key activities that are tied to performance and their description of that tie.

- Solicitations: As noted above, PG&E launched its Mid-Term Reliability Phase 2 and Phase 3 solicitations in April 2022 and February 2023, respectively, seeking to satisfy its remaining procurement obligations under the IRP Decisions, specifically to procure 500 MW of NQC of zero-emitting resources by June 1, 2025, and 400 MW of NQC of long lead time resources by June 1, 2028. PG&E issued an additional Long Lead Time solicitation on October 15, 2024.
- Supplemental Procurement Order: As described earlier, on February 23, 2023, the Commission issued D.23-02-040 increasing PG&E's procurement requirements through 2028. Accordingly, PG&E has incorporated the supplemental procurements order by this decision into its current and planned work activities.
- Procurement to Mitigate Delayed Resources: PG&E will pursue permitted long-term resources as compliance alternatives to cure procurement gaps where resources are delayed, as authorized by the IRP.

- Deemed Compliance: Where applicable, PG&E will seek to demonstrate deemed compliance, as authorized by D.25-09-007.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 6.1

QUALITY OF SERVICE

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The material updates to this chapter since the April 1, 2025 report are identified in blue font.

A. (6.1) Overview

Safety and Operational Metric (SOM) 6.1 – The Quality of Service Metric which is defined as:

The Average Speed of Answer (ASA) for Emergencies metric is a safety measure related to multiple risks, as well as quality of service and management measure, and is defined as follows: ASA in seconds for Emergency calls handled in Contact Center Operations (CCO).[1]

1. Introduction of Metric

A call is classified as an emergency when a caller selects the option of an emergency or hazard situation through the Interactive Voice Response (IVR) system. Once this option is selected the call is routed to an agent to receive the highest priority attention possible.

Not only is Emergency ASA a quality measurement of how efficiently we are able to answer customers calling us to report an emergency, but it is also a safety measurement. Answering the call is the first step ensuring the customer is safe.

The metric is calculated by determining the average amount of time it took to connect customers to a service representative for calls where the customer identifies via IVR that they are calling to report a hazardous or emergency situation, such as a suspected natural gas leak or downed power line.

2. Background

On an annual basis, Pacific Gas and Electric Company (PG&E or the Company) handles between 5 to 6 million customer calls. Between 2017 and 2021, emergency-related calls averaged nine percent of total call

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[1] Decision 21-11-019, Appendix A, p. 12.

volume; however, in the 2020 and 2021 years, emergencies calls have increased due to weather-related storms events, rotating outages, Public Safety Shutoffs (PSPS), and Enhanced Power Safety Settings (EPSS). In 2020 and 2021 emergency calls handled were 10 percent and 11 percent of total call volume, respectively.

Historically, PG&E has been able to successfully manage staffing needs to ensure emergency calls are answered quickly. The metric and associated targets are designed to maintain our performance.

3. Audit Results

In the Audit Report, Metric 6.1 received a Metric Accuracy Finding of "None." There were no Other Findings for this metric.[2]

B. (6.1) Metric Performance

1. Historical Data (2015 – June 2025)

PG&E has 10.5 years of historical data, representing 2015-June 2025, to include the total emergency calls handled and ASA by month.

The historical data for this metric provided with this report provides total emergency calls handled and the ASA performance by month and year.

2. Data Collection Methodology

The performance data is gathered from PG&E's telephony system, Cisco Unified Contact Center Enterprise (UCCE). The data includes the number of emergency calls handled and the total wait times (in seconds). Data is compiled each day for daily, weekly, monthly, and yearly reporting.

Historical data is collected using Microsoft's Management Studio application via a Structured Query Language server owned by the Workforce Management Reporting team.

The data is gathered by extracting summarized data for emergency specific call types. The call types are created by the Workforce Management Routing Team, to categorize the types of calls that are entering the phone system, Cisco UCCE.

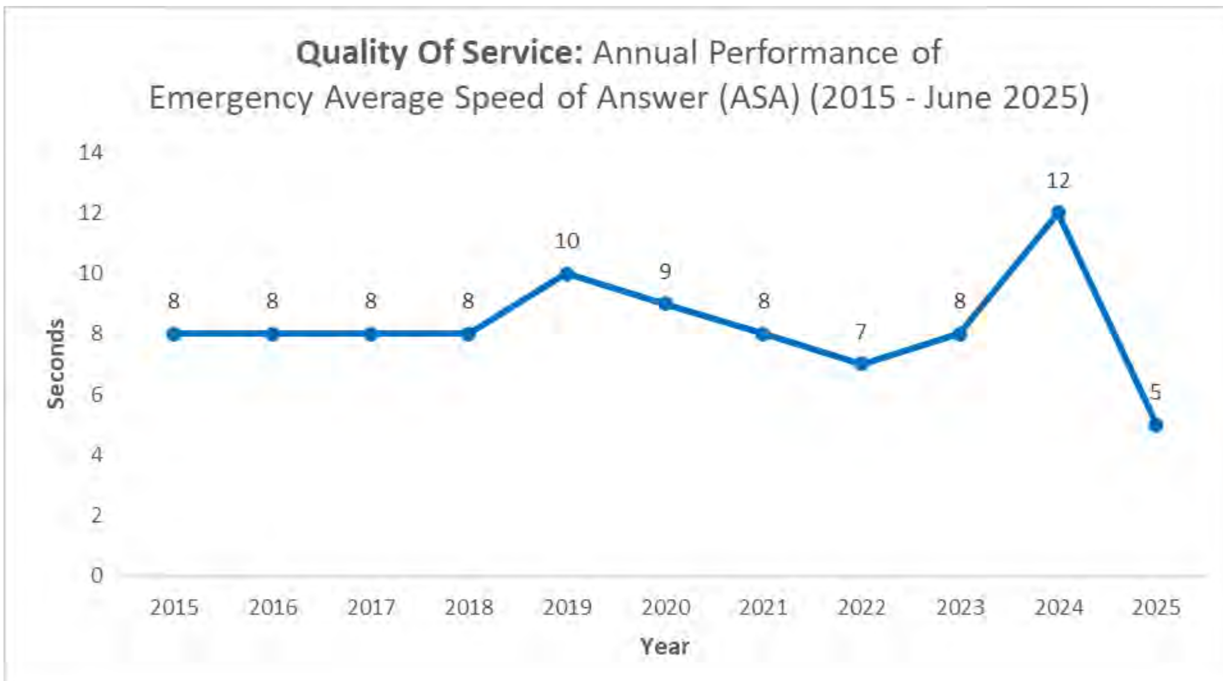
[2] Audit Report, p. 8, Table 1-1.

PG&E began archiving historical call data in 2015 once it was identified that Cisco UCCE system was truncating historical data as it was running out of storage.

3. Metric Performance for Reporting Period

Between 2015 and June 2025, the performance of Emergency ASA ranged between five and twelve seconds, with a median performance of eight seconds (see Figure 6.1-1). In 2024, PG&E's call wait time was highest (12 seconds) due to an atmospheric river in February 2024.

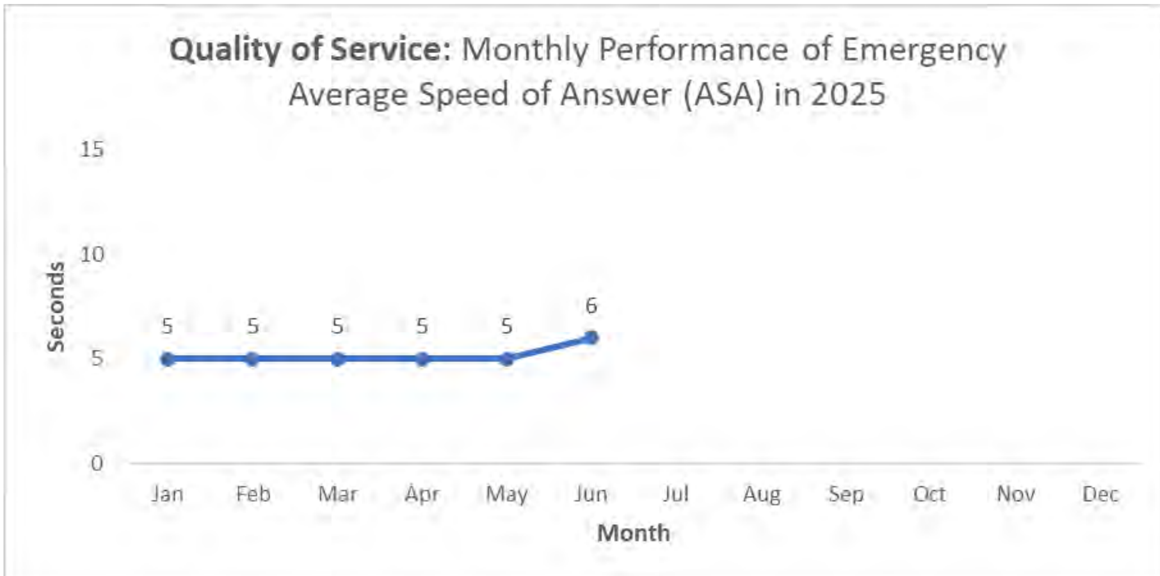
FIGURE 6.1-1
ANNUAL PERFORMANCE OF EMERGENCY ASA
(2015 – JUNE 2025)



In 2025, the Emergency ASA performance was 5 seconds through June. Over the course of the year, monthly performance metrics fluctuated between five seconds and six seconds, as illustrated in Figure 6.1-2.

Primary drivers to the performance were based on unanticipated incidents (e.g., weather incidents impacting power outages, unplanned power outages) and call center representative staffing availability.

FIGURE 6.1-2
MONTHLY PERFORMANCE OF EMERGENCY ASA IN 2025



C. (6.1) 1-Year Target and 5-Year Target

1. Updates to 1- and 5-Year Targets Since Last Report

There have been no changes to the 1-year and 5-year targets since the last SOMs report filing. The 2025 1-year target is to be at or below 15 seconds and the 2029 5-year target is to be at or below 15 seconds.

2. Target Methodology

To establish the 1-year and 5-year targets, PG&E considered the following factors:

- Historical Data and Trends: The target is based on the average of years 2015 to 2019 historical data. These years were utilized as they are most consistent with current operational practices, including the expansion of PSPS, EPSS, and Rotating outage programs. The average of this period is used as a reasonable indicator for sustaining and maintaining the performance going forward;
- Benchmarking: Not available;
- Regulatory Requirements: None;
- Attainable Within Known Resources/Work Plan: Yes, performance at or below the set target is sustainable; and
- Other Qualitative Considerations: None.

3. 2025 Target

The 2025 target is to be at or below 15 seconds for the year to maintain performance based on the factors described above.

4. 2029 Target

The 2029 target is to be at or below 15 seconds for the year to maintain performance based on the factors described above.

D. (6.1) Performance Against Target

1. Progress Towards the 1-Year Target

As demonstrated in Figure 6.1-1 above, PG&E's 2025 performance was 5 seconds, within the Company's 1-year target.

2. Progress Towards the 5-Year Target

As discussed in Section E below, PG&E has implemented a number of processes to maintain longer-term performance of this metric to meet the Company's 5-year target.

E. (6.1) Current and Planned Work Activities

The performance of this metric is significantly driven by Contact Center Representative resourcing. The CCO are staffed to handle forecasted volume based on historical trends. As staffing needs change due to upcoming events (e.g., PSPS, weather impacts, storm, or heat-related outages) overtime is offered and planned in advance to increase staffing needs. Mandatory overtime (employees are required to stay on shift) and Emergency overtime (PG&E's Workforce Management team will send out notifications to offer Emergency overtime to employees currently not on shift) are available options during same-day operations to support additional staffing needs. PG&E is forecasting to maintain the current level of staffing for 2025-2029.

Additionally, providing customers upfront messages of extended wait times via IVR can be used to set expectations and advise customers to call back unless there is an emergency.