

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Pacific Gas and Electric Company, for authority to decrease its rate and charges for electric and gas service and increase rates and charges for pipeline expansion service-test year 1996 general rate case consolidated with I9502015.

A.94-12-005
(Filed: December 9, 1994)

Commission Order Instituting Investigation into rates, charges, service and practices of PG&E; consolidates with A9412005; authority applies to A9212043 et al.

I.95-02-015
(Filed: February 22, 1995)

Commission Order Instituting Rulemaking, to develop standards for electric system reliability and safety pursuant to D96-09-073. Consolidated with I95-02-015

R.96-11-004
(Filed: November 6, 1996)

PUBLIC VERSION

**PACIFIC GAS AND ELECTRIC COMPANY'S
ANNUAL REPORT ON COMPLIANCE
WITH GENERAL ORDER 166
COMPLIANCE PERIOD: JANUARY 1, 2025, TO DECEMBER 31, 2025**

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Dated: April 30, 2026

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WITH GENERAL ORDER 166
COMPLIANCE PERIOD: JANUARY 1, 2025, TO DECEMBER 31, 2025**

Pursuant to General Order 166, Standard 11, Pacific Gas and Electric Company (PG&E) hereby submits its annual report on compliance with General Order 166 for the period January 1, 2025, through December 31, 2025 (Compliance Period). This report documents PG&E's compliance with each of the fourteen standards of the General Order.

Standard 1. Emergency Response Plan

Standard 1 requires PG&E to prepare an emergency response plan and update the plan annually to incorporate changes in procedures, conditions, law, or Commission policy.

Attached as Exhibit A is PG&E's Company Emergency Response Plan (CERP). PG&E's CERP consists of a base plan and functional and hazard annexes.

The following tables summarize required elements of Standard 1 locations within the PG&E CERP:

TABLE 1: LOCATION OF REQUIRED ELEMENTS

Standard 1 Crosswalk Sections and Subsections				
A. Internal Coordination	B. Independent System Operator/Transmission Owner Coordination	C. Media Coordination	D. External and Government Coordination	E. Wildfire Mitigation Plan
2 and subsections	2.5.1	1.1	1.1	2.9
3 and subsections	3.7.6.6	1.8	3.7.6.6	
4.1	4.4.2	3.3	4	
4.2	4.6	4.1	4.1	
4.3	6.6.3	4.4	4.3	
6 and subsections	9.3.4	4.5	4.4 and subsections	
9 and subsections	10.2.2	4.5.1	4.5 and subsections	
Appendix C through G	11.4.8	4.6	9 and subsections	
		9.2.5	Appendix C-E	
		9.2.11		
		Appendix A.2		
		Appendix C		
		Appendix E.9.3		

TABLE 2: LOCATION OF REQUIRED ELEMENTS

Standard 1 Crosswalk Sections and Subsections				
F. Safety Considerations	G. Damage Assessment	H. Restoration Priority Guidelines	I. Mutual Assistance	J. Plan Update
3.7.3 (Primary Reference)	3.7	1.7.1	1.7.1	Document Control
Additional Safety References	3.7.7	1.8	3.3	Plan Maintenance
1.5	3.7.7.1	2.5.2	3.7.8	1.1
1.7.2	3.7.7.2	2.6.1	4.1	
1.7.4	4.1	3	5	
1.7.5	5.3	3.7	5.2	
2.2.1	6.5.1	3.7.8	6.3.1	
2.2.2	10.1.2	4.1	8	
2.6	10.1.4	4.3	9.1	
2.6.1	Appendix H	4.5.1	9.3.1	
2.7.1.		5 and subsections	9.6.1	
2.7.1.1		6.3.6	10.1.5	
2.10		9.3	11.1.2	
3.2.2		9.3.2-9.3.4	11.1.3	
3.2.3		9.3.6	11.3	
3.7.3		3.7.3	12.1.2	

Standard 1 Crosswalk Sections and Subsections				
F. Safety Considerations	G. Damage Assessment	H. Restoration Priority Guidelines	I. Mutual Assistance	J. Plan Update
3.7.6.4		6.3.3	Appendix C-H	
3.7.6.6		6.3.5		
4.1		6.5		
4.3		8		
6.2.1		9.2.1		
6.2.4				
6.3.2				
6.3.3				
6.3.6				
9.2.4				
9.3.5				
9.5.1				
9.6.1				
9.7.1				
9.7.2				
10.3				
11.4.6				
11.5.4				
12.1				
12.1.2				
Appendix C and E				

In accordance with Standard 1, Element D, PG&E maintains contact information for California Governor’s Office of Emergency Services (Cal OES) regional offices and County government emergency management offices, set forth in Exhibit H as CERP EMER-3001M-Att01 and EMER-3001M-Att02, respectively. This contact information is accessible to coworkers responsible for coordinating emergency communications within PG&E’s internal Emergency Management (EMER) Guidance Document Library.

A key element of the CERP is the alignment of PG&E’s functional areas to the frameworks provided by the National Incident Management System (NIMS), California Standardized Emergency Management System (SEMS) and the NIMS/SEMS component Incident Command System (ICS). Adoption of these frameworks aligns PG&E with public

partners to execute a coordinated response that supports safe restoration of service and whole community recovery. Specifically, PG&E has adopted the following NIMS, SEMS, and ICS consistent operational components:

1. Formalized SEMS/ICS training and execution of the management by objectives concepts of ICS.
2. Whole community engagement through PG&E's presence in County Emergency Operations Centers and the State Operations Center, and actions of the Liaison Officer and team, leveraging coordination calls and collaboration of community and customer support.
3. Mutual Assistance agreement memberships at the California, Western Region, and National levels.
4. Use of the same framework as the SEMS Operational Area concept in the context of emergency organizational structure and levels, with emergencies beginning at the local level (Level 1) which is PG&E's base emergency posture.

SEMS/ICS training details can be found in CERP subsection 6.6.2, Training Program.

Whole community engagement is described in CERP section 4, Coordination and Communication. PG&E Liaison Officer actions are described in CERP subsection 9.2.7, Liaison Officer. Mutual Assistance agreements are outlined in CERP subsection 11.1.3, Collaboration with Utility and Trade Associations. SEMS Operational Area coordination framework details are described in CERP subsection 11.3, Local Government and Operational Areas, found in Exhibit A.

As required under Standard 1 Element E, PG&E's 2023-2025 Wildfire Mitigation Plan (WMP) (filed with the Office of Energy Infrastructure Safety on March 27, 2023, and updated through February 13, 2025), is available at https://www.pge.com/en_US/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan.page. The WMP describes in detail how PG&E is actively mitigating wildfire risks, including requirements specified in Standard 1, Element E, and was developed to be consistent with the requirements of the California Public Utilities Code §8386(a). The objective of the WMP is to reduce the risk and consequences of wildfires associated with utility electrical equipment.

The CERP addresses Elements A through J of Standard 1. The location of these elements within the CERP are identified in the tables above and within Exhibit D. PG&E's CERP Electric Annex is included as Exhibit B to this report. A summary of CERP and CERP Electric Annex updates is set forth below under the heading Standard 11 Annual Report.

Standard 2. Mutual Assistance Agreements

Standard 2 requires PG&E to enter into mutual assistance agreements with other utilities, to the extent such agreements would be practical and improve emergency response. Resources available to be shared under such agreements are subject to participant party availability in relation to current operational requirements.

For the Compliance Period ending December 31, 2025, PG&E maintained existing agreements with mutual aid associations, including the California Utilities Emergency Association (CUEA), the Western Region Mutual Assistance Agreement, the Edison Electric Institute (EEI), and the American Gas Association. In addition, PG&E had mutual assistance agreements with individual companies or agencies, including Florida Power and Light Company, Trinity County Public Utilities District (TCPUD), the Western Area Power Administration (WAPA), and the Yolo County Flood Control and Water Conservation District. These agreements provide the terms for requesting and delivering assistance, payment, cost recovery, and legal liability.

Along with mutual aid association and individual company or agency agreements, PG&E is a signatory to a December 8, 2017, multi-party memorandum of understanding for emergency assistance with the Puerto Rico Electric Power Authority (PREPA). This emergency assistance memorandum differs from the July 19, 2021, EEI agreement supplement, under which LUMA Energy assumed responsibility for operating and maintaining PREPA's transmission and distribution assets within the Commonwealth of Puerto Rico.

Copies of the agreements, PREPA memorandum and the EEI-LUMA Energy mutual assistance supplement are provided in Exhibit F.

Standard 3. Emergency Training and Exercises

As a guiding training principle, PG&E uses the SEMS to ensure all agencies (e.g., Cal OES regional offices and County government emergency management offices), PG&E and other Investor-Owned Utilities (IOUs) responding to a potential event are aligned to safely and efficiently communicate and respond.

In February 2020, PG&E, Cal OES, the CPUC, and the other IOUs entered into a multi-phase SEMS training related agreement to help ensure consistent training requirements for all Emergency Operations Center (EOC) staff.

For the 2025 General Order 166 Compliance Period, per Standard 3 Element C, PG&E continued to train EOC staff using an ICS Baseline, Expanded, and Position Specific approach, as follows:

- **ICS Baseline:** Foundational SEMS and NIMS courses required of all EOC personnel and pre-requisites required for any advanced training.
- **Expanded:** Expanded training required for some EOC positions (e.g., Section Chiefs, Public Information Officers, and Liaison Officers) to build upon ICS Baseline courses. This includes the following California Specialized Training Institute approved courses:
 - G-191 (EOC/ICS Interface)
 - G-626 (EOC Action Planning)
 - G-775 (EOC Management and Operations)
 - ICS-300 (Intermediate ICS for Expanding Incidents)
 - ICS-400 (Advanced ICS)
- **Position Specific:** Training focused on EOC specific roles.

PG&E used its CERP during the 2025 Public Safety Power Shutoff (PSPS) and Wildfire Exercise Series simulating R5-Plus fire weather.¹ This exercise was designed to test eight

¹ Extreme fire risk limiting the use of certain equipment and open flames in designated areas.

objectives aligned to PG&E's Core Capabilities.² Key activities included a Table Top Exercise (TTX) in March 2025, and a Full Scale Exercise (FSE) from April to May 2025.

The TTX took place on March 27, 2025, from 9:00 a.m. to 4:00 p.m. at PG&E's Vacaville EOC. Command & General Staff attended in person, while other PG&E participants joined virtually via Microsoft Teams as observers. The event included a PSPS Program & Technology Update and a detailed overview of the Meteorology Scenario for discussion.

PG&E held the FSE from April 28 to May 2, 2025, starting with Readiness Posture and on-call EOC positions on April 28, 2025. The EOC activated at noon, and the exercise ran each day from 6:00 a.m. to 6:00 p.m., concluding at 4:00 p.m. on the final day, followed by the Player Hotwash.

Per Standard 3 Element D, invitations for the FSE were sent out on February 15, 2025, to appropriate state and local authorities, including the Commission, state and regional offices of the OES, and emergency offices of the counties in which the exercise was to be performed. Exhibit G contains the After Action Report (AAR) evaluation for PG&E's 2025 PSPS and Wildfire Full Exercise Series, including the TTX and FSE.

PG&E also participated in a variety of other exercises designed to address hazards that could impact electric distribution facilities or services. Hazard types exercised include but may not be limited to winter storm preparedness, floods, cyber and physical security, and summer/capacity.

Standard 4. Summary of PG&E's Communications Strategy

Standard 4 requires PG&E to develop a written strategy for informing the public and relevant agencies of a Major Outage or Emergency, as defined by the General Order. PG&E's process for developing a strategy to communicate with the media, customers, regulatory

² Planning, Operational Coordination, Operational Communication, Public Information and Warning, Situational Awareness, Critical Resources, Fire Management and Suppression, and Natural and Cultural Resources.

agencies, and other governmental organizations is described and annually updated in the Emergency Communications Annex, which is an annex to the CERP.

Attached as Exhibit C, the PG&E CERP Emergency Communications Annex ensures coworkers with emergency communication positions have a thorough understanding of their roles, responsibilities, and processes and that the company speaks with “One Voice” to internal and external audiences.

Applicable to Major Outages, PG&E’s communications teams develop and implement a strategy for keeping the public apprised of important updates through a variety of channels before, during, and after emergencies. For PSPS events, PG&E uses multiple communications channels to notify the public including direct customer notifications, PSPS Address Alerts, the PG&E website, social media, information releases to local media, and Live Agent Call Center Support. For wildfire related information about PG&E’s notification strategies for 2025, refer to the Protocols for Emergency Communications section of PG&E’s WMP, available at the link provided in this report under the heading Standard 1, Emergency Response Plan.

PG&E activated its EOC four times during the Compliance Period for:

- Sequential PSPS events on January 20 and 22, 2025;
- Separate PSPS events on January 13 and June 19, 2025; and
- Simultaneous support to a San Francisco division outage beginning December 20, 2025, and a winter storm beginning December 22, 2025.

Post-event lessons learned as of May 6, 2025, are captured in PG&E’s 2025 CERP Emergency Communications Annex update, including detailed planning, process, and business continuity information and pre-approved message content for coworker use during or after an emergency incident or event.

The Company’s community outreach efforts include website communications, media engagement, community events, PSPS and wildfire preparedness regional townhalls, and open houses (webinars), Community Based Organization engagement, Medical Baseline customer

outreach, tribal government/community engagement, and the use of advisory boards. These outreach efforts help customers prepare for the unique impacts of wildfire, de-energization, and natural disaster or emergencies. PG&E makes a considerable effort to use a diversity of channels to best reach customers in the format of their choice.

PG&E's customer outage communications vary, depending on the type of outage and the configuration of the affected circuit and the overall posture of PG&E during the outage. PG&E deploys several methods to communicate with customers when they experience an outage, including via Customer Service Representatives, the PG&E website, social media, customer preference and notification via email, text, or voice message, and Automated Interactive Voice Response (IVR) telecom systems. When available, PG&E provides situational messaging up front on a toll-free number.

In cases of severe weather/storm events, PG&E employs pre-notifications by email to customers that have been impacted by storms in the past resulting in extended outages. In addition, PG&E uses ad-hoc notifications where immediate assessment and estimated time of restoration notifications cannot be accomplished due to extensive storm impacts. These messages are deployed to select customers through consultation with our local field operations teams by our Customer Strategy Officers in the local emergency operations centers.

PG&E also has extensive and detailed outage information available to customers and the public on its website. This information is available at: <https://www.pge.com/en/outages-and-safety.html>.

PG&E's coordination and communication strategy with tribal, state and local governmental agencies is contained in the CERP and the Emergency Communications Annex. PG&E Public Safety Specialists³ maintain state and local government contact

³ Managed by its Wildfire, Emergency & Operations, Emergency Field Operations organization, PG&E's Public Safety Specialist (PSS) program is a field-based resource that supports PG&E's response when deployed in support of incident or events. PSS personnel work with local, state, and federal agencies throughout the year to socialize PG&E's emergency response plans and execution goals.

information in coordination with PG&E's Local Government Affairs department. PG&E teams engage with local agencies throughout the year, with preparation for wildfire and PSPS season being a primary focus.

For transmission system issues, PG&E's Grid Control Center (GCC) is the official point of contact with the California Independent System Operator (CAISO). The GCC notifies the CAISO of abnormal system configurations or conditions. PG&E's plan for communicating and coordinating with the CAISO is described in the Electric Annex (Exhibit B) and the Emergency Communications Annex (Exhibit C).

Standard 5. Activation Standard

Standard 5 requires PG&E to begin coordinating its internal resources as set forth in its emergency and disaster preparedness plan within one hour of the identification of a Major Outage. PG&E did not experience a Major Outage in 2025, as defined by this General Order, during the Compliance Period.

Standard 6. Initial Notification Standard

Standard 6 requires PG&E to notify the Commission, affected Essential Customers, and the Office of Emergency Services Warning Center of the location, possible cause, and expected duration within one hour of identifying a Major Outage or newsworthy event. PG&E did not experience a Major Outage in 2025, as defined by this General Order, during the Compliance Period.

PG&E experienced a newsworthy event during the 2025 Compliance Period. On December 20, 2025, a substation fire resulted in a PG&E outage in San Francisco, impacting more than 100,000 customers. PG&E informed Cal OES of its EOC activation at 3:35 p.m., followed by a notification to the Commission at 3:39 p.m. regarding the incident. All impacted customers, including affected Essential Customers were notified on December 20, 2025, between 1:09 p.m. and 3:55 p.m. Customers received a notification that there was an initial disturbance with an estimated time of restoration.

Standard 7. Mutual Assistance Evaluation Standard

Standard 7 requires PG&E to evaluate the need for mutual assistance during a Major Outage. PG&E did not experience a Major Outage in 2025, as defined by this General Order, during the Compliance Period.

Standard 8. Major Outage and Restoration Estimate Communication Standard

Standard 8 requires PG&E to inform the public and relevant public safety agencies of the estimated time for restoring power during a Major Outage. PG&E did not experience a Major Outage in 2025, as defined by this General Order, during the Compliance Period.

PG&E reports its PSPS customer outage communications in accordance with the detailed reporting procedures set forth in Resolution ESRB-8 and Decision (D.) 19-05-042, issued in Phase 1 of the De-Energization Rulemaking Proceeding (R.18-12-005). This reporting protocol includes, as applicable, major outage notifications and restoration estimates sent to Essential Customers, state and local public agencies, and the media.

Per Standard 8, Element D and E, PG&E's CERP includes methods for restoration estimate methodology, for evaluating the accuracy of those forecasts following any emergency or disaster and is compatible with PSPS Guidelines.

Standard 9. Personnel Redeployment Planning Standard

Standard 9 requires PG&E to train personnel to assist with emergency activities (i.e., assess damage and perform safety standby) in preparation for responding to a Major Outage. Section 3 of the Electric Annex (Exhibit B) sets forth PG&E's personnel redeployment plan in support of safety standby and damage assessment during a Major Outage.

During the 2025 GO 166 Compliance Period, PG&E conducted training sessions for additional personnel that can be called upon to perform 911 Standby Training (TECH-0300) in lieu of their normal duties. As of December 31, 2025, 4,785 non-traditional emergency response coworkers (including meter system technicians, meter maintenance persons, gas service representatives, gas maintenance and construction workers, gas transmission and regulation workers, work & resource inspectors, mappers, estimators, etc.) had completed 911 Standby

training (TECH-0300). The training included how to: (1) identify hazards in the electric distribution system, (2) standby hazards safely, and (3) maintain safety for the public and themselves until a qualified electric worker (QEW) arrives at the scene. 911 standby resources are configured as one or two-person crews with limited knowledge of electric field equipment. When deployed in support of restoration and damage assessment, 911 standby personnel are responsible for cordoning off a hazardous condition and/or relieving a 911 agency until a QEW, crew or troubleshooter arrives to clear and/or repair the hazard.

Standard 10. Annual Pre-Event Coordination Standard

PG&E conducts frequent, recurring pre-event coordination activities with public safety partners at the tribal, state, county, and city levels throughout PG&E's service area. Key communication channels include:

- **Public Safety Specialist Team Engagements:** PG&E's Public Safety Specialist Team provides personalized engagements (e.g., meetings, calls) specific to external agency emergency preparedness needs and local issues. These engagements encompass a variety of outreach channels, including:
 - First responder workshops.
 - Wildfire safety town halls.
 - Cal OES Mutual Aid Region Advisory Committee meetings.
 - General regional coordinator meetings.
 - Professional meetings.
 - Trainings, exercises, and drills.
 - One-on-one delivery.
- **Local Government Forums:** PG&E offers an annual meeting opportunity to every city and county to review emergency plans, highlight programs of interest (such as PSPS), review prior year accomplishments and milestones, receive feedback, and learn of any pertinent city and county work.
- **PSPS Regional Working Groups:** PG&E hosts quarterly stakeholder working sessions to discuss:

- Post wildfire lessons learned,
- PSPS, and
- Wildfire safety updates.

The sessions are designed for utilities to gather feedback on their wildfire safety activities, including issues raised by local governments. Sessions provide an opportunity to assess the status existing action items and, per CPUC Public Safety Power Shutoff (PSPS) Phase 1 Decision⁴, provide a forum for PG&E to gather feedback on de-energization protocols and processes.

- **Tabletop and Functional Exercises:** PG&E hosts exercises to evaluate its ability to communicate effectively with partners during wildfire and PSPS outages, again efficiencies within roles and identify areas of improvement.
- **Community Wildfire Safety Program (Trainings and Workshops (Ad-hoc):** PG&E hosts trainings and workshops for agencies and other public safety partners, (e.g., PSPS Portal trainings, and deep dives on wildfire mitigation efforts).

PG&E includes public safety partners in the planning of and participation in annual PSPS tabletop and functional exercises. Strengths and areas for improvement are captured in exercise AARs, and corrective actions are leveraged to improve planning and coordination.

From January 1, 2025, to December 31, 2025, PG&E's Public Safety Specialist Team conducted a series of First Responder Workshops with local public safety agencies. A total of 5,938 representatives from 368 local public safety agencies were in attendance.

Standard 11. Annual Report

Standard 11 requires PG&E to submit an annual report describing compliance with these standards during the Compliance Period and to identify any modifications to PG&E's emergency plan. In accordance with Decision (D.) 21-05-019, this report covers the Compliance Period January 1, 2025, through December 31, 2025.

⁴ D. 19-05-042

The following is a summary of the changes that PG&E made to the emergency plan during the Compliance Period.

Company Emergency Response Plan

Areas added or updated in CERP versions in effect from January 1, 2025, to December 31, 2025, are identified in PG&E's Exhibit E attachment to its April 30, 2025, General Order 166 filing.

Electric Annex

Attached as Exhibit B is PG&E's CERP Electric Annex. Changes included in the July 1, 2025 update can be found in the change record at the beginning of the document. The Electric Annex to the CERP outlines PG&E's electric emergency management organizational structure, roles, and responsibilities, and describes the activities undertaken in response to electric emergency outage situations. The Annex is a key element to ensure the company is prepared for emergencies to minimize impact on the public, which may occur due to:

- Electric system failures
- Major outages.
- Newsworthy events
- Hazards posed by damage to electric facilities.

Emergency Communications Plan

Attached as Exhibit C is the PG&E CERP Emergency Communications Annex which was updated on May 6, 2025. Changes can be viewed in the change record at the beginning of the document. The Annex contains detailed planning, process, and business continuity information and pre-approved content to guide staff communications in response to an emergency or catastrophic event. The Annex supports all employees in emergency communication positions in understanding key roles, responsibilities, and processes, and that the company is speaking with "One Voice" to internal and external audiences.

To improve 2025 PSPS event communications, PG&E worked closely with external media outlets, including both paid and earned media, to build broad awareness among

Californians, share tips related to wildfire and PSPS preparedness, socialize available resources, and communicate PSPS event information. PG&E is also enhancing and formalizing coordination with multicultural media organizations for both preparedness outreach and in-event communications. For a detailed description of PG&E's engagement with external partners, refer to the External Collaboration and Coordination section of the 2023-2025 WMP.

Standard 11 also requires that PG&E report on the number of available repair and maintenance (R&M) personnel in each personnel classification and in each county during the Compliance Period. Exhibit I shows the number of PG&E R&M personnel in each job classification in each county, with company-wide totals as of December 31, 2025. 3,825 R&M employees were on staff during the Compliance Period.

Standard 12. Restoration Performance Benchmark for a Measured Event

Standard 12 stipulates a restoration performance benchmark for Measured Events. PG&E did not experience a Major Outage or Measured Event in 2025, as defined by this General Order, during the Compliance Period.

Standard 13. Call Center Benchmark for a Measured Event

Standard 13 stipulates call center performance benchmarking for Measured Events. PG&E did not experience a Major Outage or Measured Event in 2025, as defined by this General Order, during the Compliance Period.

Standard 14. Plan Development Coordination and Public Meeting

PG&E understands Standard 14 to require consultation and public meetings on its emergency plan development in accordance with D.21-05- 019.

In addition to First Responder Workshops, PG&E has invited service area municipalities to provide verbal and written input to its CERP and CERP Electric Annex.

On April 2, 2025, PG&E formally invited 292 City Managers and 48 County Executive Officers to participate in plan review meetings intended to gather feedback and provide consultation regarding PG&E's CERP and CERP Electric Annex. Details regarding meeting dates, times, locations, and representative attendees are outlined below: