

**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 2020 Risk Assessment and Mitigation Phase Report.

A.20-06-012  
(Filed on June 30, 2020)

**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, 2023.

A.21-06-021  
(Filed on June 30, 2021)

(U 39 M)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U39M)  
2023 SAFETY PERFORMANCE METRICS REPORT  
IN COMPLIANCE WITH CALIFORNIA PUBLIC UTILITIES COMMISSION  
DECISIONS 19-04-020 AND 21-11-009**

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Dated: April 1, 2024

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IN COMPLIANCE WITH CALIFORNIA PUBLIC UTILITIES COMMISSION  
DECISIONS 19-04-020 AND 21-11-009**

Pacific Gas and Electric Company (PG&E) submits its 2023 Safety Performance Metrics Report in compliance with Decisions (D.) 19-04-020 and 21-11-009.

In 19-04-020, the *Phase Two Decision Adopting Risk Spending Accountability Report Requirements and Safety Performance Metrics For Investor-Owned Utilities And Adopting A Safety Model Approach For Small And Multi-Jurisdictional Utilities*, the California Public Utilities Commission (Commission) directed the large investor owned utilities to annually file a Safety Performance Metrics Report on March 31.<sup>1</sup> The Safety Performance Metrics Report must include:

- The last ten years for all Safety Performance Metrics for which such data exists;
- A narrative context about the value of the safety metrics;

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<sup>1</sup> D.19-04-020, p. 26.

- Identification of the metrics linked to or used for purposes of determining executive compensation levels for positions director-level and above;
- Descriptions of bias controls that the utility has in place for reporting of the metrics;
- Examples of how the metrics have informed training and supported risk-informed decision-making;
- Explanations of how the metrics reflect progress against safety goals included in the utility's General Rate Case; and
- A high-level summary of the total estimated and recorded risk-related spend.<sup>2</sup>

In the *Order Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities*, the Commission reassessed the Safety Performance Metrics adopted in D.19-04-020.<sup>3</sup> At the conclusion of Phase I of that proceeding, the Commission adopted 32 Safety Performance Metrics in D.21-11-009. The report attached hereto covers the revised set of Safety Performance Metrics.

PG&E's 2023 Safety Performance Metrics Report is provided as the Attachment.

Respectfully Submitted,

By: /s/ Peter Ouborg

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<sup>2</sup> D.19-04-020, pp. 25-27, p. 63, Ordering Paragraph 6.

<sup>3</sup> See Assigned Commissioner's Scoping Memo and Ruling, p. 5, dated November 2, 2020.

**PACIFIC GAS AND ELECTRIC COMPANY**

**ATTACHMENT**

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**PACIFIC GAS AND ELECTRIC COMPANY**

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**IN COMPLIANCE WITH**  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
**DECISION 19-04-020 AND DECISION 21-11-009**

**APRIL 1, 2024**

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PACIFIC GAS AND ELECTRIC COMPANY  
2023 SAFETY PERFORMANCE METRICS REPORT

TABLE OF CONTENTS

Section	Title	Page
1	INTRODUCTION	1-1
2	METRIC DATA EXAMPLES	2-1
3	BIAS CONTROLS AND METHODOLOGY	3-1
4	2023 IMPUTED ADOPTED VALUES FOR SAFETY-RELATED RISK MITIGATION AND CONTROLS ACTIVITIES	4-1
5	SAFETY PERFORMANCE METRICS	5-1
Attachment A	MONTHLY METRIC DATA TABLES	AtchA-1
Attachment B	REPORT METRIC 22 – PUBLIC SIF SUBCATEGORIES PER SPD REQUEST	AtchB-1

**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**SECTION 1**  
**INTRODUCTION**

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **2023 SAFETY PERFORMANCE METRICS REPORT**  
3                                   **SECTION 1**  
4                                   **INTRODUCTION**

5 **I. Introduction**

6           Pacific Gas and Electric Company (PG&E) submits its 2023 Safety  
7           Performance Metrics Report (SPMR) in compliance with Decision (D.) 19-04-020  
8           and D.21-11-009 concerning the Risk-Based Decision-Making Framework  
9           proceeding, Rulemaking 20-07-013. The purpose of the SPMR is to provide the  
10          Commission and interested parties' information on PG&E's performance related  
11          to key safety metrics.

12          Safety is PG&E's most important responsibility. Our customers and  
13          communities deserve the assurance that we will deliver electricity and natural  
14          gas safely and reliably.

15          PG&E is committed to continuing to improve the safety of our workforce and  
16          the public. Benchmarking and safety metrics are measured and analyzed to  
17          drive business decisions and the right behavior as we continue to strengthen our  
18          safety efforts. PG&E monitors our progress with a focus on leading indicators as  
19          well as lagging metrics to show our progress over time. This helps PG&E  
20          identify and address the underlying causes of safety incidents to prevent them  
21          from reoccurring.

22          The information in this SPMR confirms areas where PG&E has shown  
23          significant safety progress over the past decade. At the same time, as shown in  
24          other datasets, we have more work to do.

25          PG&E's focus is on building an accountable, transparent organization that  
26          embraces a Speak Up culture, where raising issues and ideas are encouraged.  
27          PG&E's safety stand is "Everyone and Everything is Always Safe." To support  
28          this stand, one of the key initiatives under PG&E's 10-Year True North Strategy  
29          is to drive toward public and coworker safety. Our objective continues to be  
30          demonstrating, through our actions, that we are working every day towards  
31          restoring trust with sustained performance and accountability.



1 **a. Background**

2 Pursuant to D.19-04-020, for its 2019 and 2020 reporting years, PG&E  
 3 reported performance against 25 Safety Performance Metrics (SPM),  
 4 including providing up to 10 years of historical data.

5 On November 9, 2021, through the Commission’s Risk Based Decision  
 6 Making Framework rulemaking process that began on November 17, 2020,  
 7 the Commission approved D.21-11-009 approving 32 existing, updated, and  
 8 new SPMs. Accordingly, in this SPMR, PG&E is providing metric data on the  
 9 32 metrics shown in the table below. Please see Section 5 for more detailed  
 10 information on each individual metric.

11 **b. Summary of 2023 Metric Data**

Metric Name	Units	2023 Data
1. Transmission & Distribution (T&D) Overhead Wires-Down Non-Major Event Days	Number of wires-down events	3,074
2. Transmission & Distribution (T&D) Overhead Wires Down - Major Event Days	Number of wires-down events	7,173
3. Electric Emergency Response Time	The time in minutes that an electric crew person or a qualified first responder takes to respond after receiving a call which results in an emergency order.	Average: 32 minutes Median: 29 minutes
4. Fire Ignitions	Number of ignitions	379
5. Gas Dig-In	The number of 3rd party gas dig ins per 1,000 USA tags/tickets	Gas Tickets: 1,253,563 3rd Party Dig-ins: 1,230 3rd Party Dig-in Ratio: 0.98
6. Gas In-Line Inspection	Total number of miles of inspections performed and percentage inspected by ILI.	461.5 miles inspected by ILI in 2023 out of a total of 6,386 miles of Transmission Lines which is equivalent to 7% inspected annually.
7. Gas in-Line Upgrade	Miles	60.8
8. Gas Shut-In Time – Mains	Time in minutes required to stop the flow of gas for Distribution Mains	EOY (Median): 80.0 EOY (Avg): 96.6
9. Gas Shut-In Time – Services	Time in minutes required to stop the flow of gas for Distribution Services	EOY (Median): 35.3 EOY (Avg): 45.4

Metric Name	Units	2023 Data
10. Cross Bore Intrusions	Number of cross bore intrusions per 1,000 inspections	Inspections Complete: 8,085 Cross Bores Found: 29 Find Rate: 3.59 per 1,000 inspections.
11. Gas Emergency Response Time	The time in minutes that a gas service representative or a qualified first responder takes to respond after receiving a call which results in an emergency order.	Median: 18.2 Average: 19.8
12. Natural Gas Storage Baseline Inspections Performed	Number of Assessments completed/Number scheduled or targeted	EOY Well Baseline Inspections: 21 EOY % Progress to Goal: 83%
13. Gas System Internal Inspection Status	Percentage	EOY System Piggability: 50.93% EOY Piggable Milage Total: 3,253
14. Employee Days Away, Restricted and Transfer (DART) Rate	DART Cases times 200,000 divided by employee hours worked	0.700 EOY
15. Rate of SIF Actual (Employee)	Number of SIF-Actual cases among employees x 200,000/employee hours worked	0.011 EOY
16. Rate of SIF Actual (Contractor)	Number of SIF-Actual cases among contractors x200,000/contractor hours worked	0.004 EOY
17. Rate of SIF Potential (Employee)	Number of SIF-Potential cases among employees x 200,000/employee hours worked	0.080 EOY
18. Rate of SIF Potential (Contractor)	Number of SIF-Potential cases among contractors x 200,000/contractor hours worked	0.110 EOY
19. Contractor Days Away, Restricted Transfer (DART)	OSHA DART Rate	0.290 EOY
20. Public Serious Injuries and Fatalities	Number of Serious Injuries and Fatalities	17
21. Helicopter/ Flight Accident or Incident	Number of accidents or incidents (as defined in 49 CFR Section 830.5 "Immediate Notification") per 100,000 flight hours.	Total Incidents: 0 Total number of flight hours per year for reporting the number of incidents per 100,000 flight hours: 29,508

Metric Name	Units	2023 Data
22. percentage of Serious Injury and Fatality Corrective Actions Completed on Time.	Total number of SIF corrective actions completed on time (as measured by the due date accepted by functional area Corrective Action Review Boards (CARB)) divided by the total number of SIF corrective actions past due or completed.	98%
23. Hard Brake Rate	Total number of hard braking events per thousand miles driven in a given period	0.3
24. Driver's Call Complaint Rate	Total number of driver complaint calls received per 1 million miles driven	4.6
25. Wires-Down not resulting in Automatic De-energization	Percentage of wires down occurrences	Distribution: 9.3% Transmission: 1.0%
26. Missed Inspections and Patrols for Electric Circuits	Percentage of structures that missed inspection relative to total required structures.	Distribution Patrols: 3.94% Distribution Inspections: 0.00% Transmission Patrols: 0.00% Transmission Inspection: 0.00%
27. Overhead Conductor Size in High Fire Threat District Tiers 2 and 3, HFTD	Percentage of primary distribution overhead conductors in Tiers 2 and 3 HFTD that is #6 copper (6Cu) relative to total circuit miles	10.49%
28. Gas Operation Corrective Actions Backlog	Percentage of work orders past due for completion in the past calendar year	Distribution Overdue Work Orders: 2,575 Total Work Orders: 13,397 EOY: 0.19 Transmission Overdue Work Orders: 4 Total Work Orders: 304 EOY: 0.01
29. GO-95 Corrective Actions (Tiers 2 and 3, HFTD)	Percentage of corrective actions completed	Distribution: 8% Transmission: 47% Vegetation Management: 98%
30. Gas Overpressure Events	Number of occurrences	Distribution: 3 Transmission: 2
31. Gas In-Line Inspections Missed	Number of Missed Inspections	Gas in-line inspections missed: 0

Metric Name	Units	2023 Data
32. Overhead Conductor Safety Index	Number of occurrences per 1,000 circuit miles	Total Events: 3,074 Total Events per 1,000 circuit miles: 31.23

**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**SECTION 2**  
**METRIC DATA EXAMPLES**

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **2023 SAFETY PERFORMANCE METRICS REPORT**  
3   **SECTION 2**  
4   **METRIC DATA EXAMPLES**

5 **II. Metric Data Examples** Prior to the SPMR, Pacific Gas and Electric Company  
6 (PG&E or the Company) tracked many of these metrics because they provide  
7 valuable insight on our safety performance. As required in Decision (D.) 19-04-020,  
8 PG&E provides three to five examples of how PG&E uses these metric data to  
9 (1) improve staff or contractor training and/or take corrective actions aimed at  
10 minimizing top risks or risk drivers; and (2) support risk-based decision-making.

11       a) Metric 1 – Wires Down: Informs Risk-Based Decision Making.

12                   Transmission and Distribution (T&D) Overhead Wires Down data is used  
13 to inform the Overhead Primary Deteriorated Conductor Replacement  
14 program. The program centralizes the prioritization, tracking, and funding of  
15 conductor replacement projects in non-high fire threat district (HFTD) areas  
16 and targets replacement of primary conductor segments with elevated wires  
17 down rates, especially small conductor and overlap of corrosion zones.

18                   The program is informed with the Wires Down Database which tracks  
19 high priority replacement attributes about the conductor (such as size, type,  
20 known splices, annealing, etc.) as well as environmental factors and risks  
21 (such as corrosion zone, snow loading zone, and HFTD). These attributes  
22 and factors are used to determine conductor replacement project initiation,  
23 justification, and priority, as well as to determine failure trends of types of  
24 conductors and environmental factors, that may increase asset health  
25 deterioration. The Overhead Primary Deteriorated Conductor Replacement  
26 Program targets areas with the greatest public safety consequence, high  
27 priority replacement attributes, and areas experiencing repeat Wires Down  
28 events.

29       b) Metric 3 – Electric Emergency Response Time: Corrective Action/Training.

30                   In 2023, performance data for PG&Es Electric Emergency Responses  
31 were reviewed as part of its daily operation review cadence. If any individual  
32 responses are below target, they are investigated for understanding and  
33 potential tactic adjustment. With significant weather events providing the

1 greatest challenge to universal timely electric emergency response, gas  
2 construction resources were added to the population of trained electric  
3 emergency standby resources. This helped PG&E staff more locations with  
4 a denser amount of standby personnel before significant events. As an  
5 additional step, consultation with PG&E's Meteorology experts in advance of  
6 scheduling emergency standby resources in 2023 helped to better pinpoint  
7 the location and timing of incoming wind.

8 c) Metric 4 – Fire Ignitions: Informs Risk-Based Decision Making.

9 PG&E started cataloging reportable ignition data in June 2014 per our  
10 Fire Incident Data Collection Plan (RISK-6306S) and has used the data to  
11 gauge performance and drive data-driven wildfire risk reduction strategies.

12 Through maturation of the Enhanced Powerline Safety Settings (EPSS)  
13 Program and widespread deployment of high-impedance fault detection  
14 technology like Downed Conductor Detection (DCD), PG&E finished 2023  
15 with 64 CPUC reportable ignitions in HFTD attributable to PG&E assets.  
16 These results show approximately 49 percent reduction from the 2020 to  
17 2022 annual average of 125 ignitions. More importantly, PG&E reduced the  
18 overall risk associated with these 64 ignitions by focusing our efforts to  
19 eliminate ignitions during the conditions that pose the greatest risk of starting  
20 a catastrophic wildfire. PG&E reduced the count of ignitions where the Fire  
21 Potential Index was in Fire Potential Index (FPI) R3 conditions or greater for  
22 that geospatial and temporal location from 75 ignitions, based on previous  
23 year averages, to 27 ignitions in 2023. PG&E can expect to see improved  
24 performance on this metric through continual execution of the Wildfire  
25 Mitigation Plan and maturation of key wildfire mitigation strategies, including:

- 26 • Maturation of the EPSS Program;
- 27 • Public Safety Power Shutoff; and
- 28 • System hardening inclusive of undergrounding.

29 d) Metric 14 – Employee Days Away, Restricted and Transfer (DART):

30 Corrective Action and Informs Risk-Based Decision Making.

31 PG&E program efforts are designed to address employee safety, which  
32 was informed by the Employee Lost Work Day (LWD), and Employee DART  
33 Rate metrics. These program efforts include expanding PG&E's ergonomic  
34 programs and increasing the number of Industrial Athlete Specialists for job

1 site evaluations. A primary goal of the efforts is reduced injury severity  
2 through injury prevention and early intervention care for employees. In  
3 alignment with this, we have strengthened the identification of the highest  
4 risk work groups and tasks for field and vehicle ergonomic injuries. We  
5 identify high risk computer users through predictive modeling and provide  
6 targeted interventions. Additional efforts also include enhanced injury  
7 management containment for injuries at risk for escalation to DART and  
8 providing our people leaders with additional injury management training.  
9 This metric remains in effect and continues to be monitored.

10 e) Metric 15 – Employee SIF and Metric 20 – Public SIF: Motor Vehicle Safety  
11 Corrective Action and Informs Risk Informed Decision Making.

12 PG&E uses cause analysis of SIFs to develop mitigations designed to  
13 improve these safety metrics. For example, use of mobile devices while  
14 driving is one of the potential causes of employee motor vehicle related SIFs.  
15 As a follow-up to the three-month pilot on the cell phone blocking technology  
16 conducted in 2021, the cell blocking program is now in use with  
17 approximately 2,000 active users and has effectively suppressed over  
18 335,000 texts and over 83,000 calls in 2023.

19 f) Metric 24 – Drivers Complaint Rate: Corrective Action/Improved Training.

20 The Drivers Complaint Rate metric data is used to inform the Drivers  
21 Scorecard, which provides leaders a continuous review of the drivers'  
22 preventative motor vehicle incidents (PMVI), and call Complaints, and sets  
23 limits when action needs to be taken. The scorecard also includes a motor  
24 vehicle training details status report and any additional training needs based  
25 on employee PMVI status. This scorecard is designed to provide employees  
26 with timely coaching and to reduce overall Motor Vehicle Safety Incident risk.  
27 The scorecard was rolled out in mid-2021 enterprise-wide, with a dashboard  
28 for leaders to access a single source containing multiple data points related  
29 to driver/vehicle risk.

30 g) Metric 16 – Contractor SIF: Corrective Action/Improved Training and Informs  
31 Risk-Based Decision Making.

32 To improve this safety metric, in late 2022, PG&E began facilitating  
33 Contractor Safety Quality Assurance Reviews (CSQAR) with selected  
34 Contractors with adverse trends in safety performance and who are at risk of



1 experiencing a Serious Injury or Fatality. Initially, the focus is on Contractors  
2 with high incident counts, at-risk finding rates, and hours worked.

3 A CSQAR is a detailed assessment of the Contractor's safety program  
4 implementation and field safety performance. PG&E partners with the  
5 Contractors on the CSQAR process, which includes a desktop review, safety  
6 culture survey, barrier analysis, and leadership engagement with a focus on  
7 the elimination of serious injuries and fatalities. Safety concerns or issues  
8 identified are documented and a safety improvement plan for compliance and  
9 mitigation, as well as any additional training needs, is established by the  
10 Contractor. Once PG&E accepts the safety improvement plan, PG&E and  
11 the Contractor will participate in a documented Effectiveness Review to  
12 validate its implementation and effectiveness.

13 Contractor Safety Quality Assurance Reviews (CSQAR) were completed  
14 in 2023 with the identified top at-risk contract companies. All contract  
15 companies were active and positive participants and 77 percent of these  
16 contract companies did not experience a SIF throughout the remaining 2023.

17 h) Metrics 15 through 18 – Employee SIF Actual, Contractor SIF Actual,  
18 Employee SIF Potential, and Contractor SIF Potential Inform Risk-Based  
19 Decision Making for the 2024 RAMP analysis.

20 The SIF actual and potential metrics for the employee and contractor  
21 workforce support implementation of the SIF Capacity & Learning Model  
22 which is aligned with the Edison Electric Institute (EEI) Safety Classification  
23 and Learning model to inform risk-based decision making for both the  
24 Employee Safety Incident and Contractor Safety Incident risks. In addition,  
25 the metrics have been incorporated into the risk RAMP model analyses and  
26 inform health and safety program effectiveness.

27 i) Metric 11 – Gas Emergency Response; Metric 30 – Gas Overpressure  
28 Events: Corrective Action/Improved Training

29 In 2023, Gas continued the journey of Process Safety Management  
30 maturity. The Process Safety Indicator (PSI) dashboard, based on a pyramid  
31 framework, is reviewed monthly at Gas Safety Excellence and Process  
32 Safety Progress Meetings and other senior leadership platforms. This  
33 includes review of relevant metrics, including Safety Performance Metrics  
34 such as gas dig-ins, shut in the gas average time, cross bore intrusions, and

1 gas emergency response. Gas continued to be compliant, per a third-party  
2 assessment, with the intent of API RP754, Process Safety Performance  
3 Indicators, demonstrating a commitment to incident prevention.

4 The metrics alignment framework helps to drive ownership and  
5 accountability to ensure leading indicators are acted upon to prevent a major  
6 gas incident that can lead to serious injuries, fatalities, or cause significant  
7 interruption to the gas business. These metrics continue to be evaluated  
8 during Daily Operating Reviews (DORs or huddles) to ensure that Gas drives  
9 the appropriate continuous improvement conversations.

10 The dashboard was expanded to be presented at the Quality and  
11 Process Improvement Committee (QPIC). Updates to align each of the  
12 metrics to the correct Mega Process also took place, ensuring ownership and  
13 accountability.

14 j) Metric 5 – Gas Dig-In: Corrective Action and Informs Risk-Based Decision  
15 Making

16 Analysis of Third-Party at Fault dig-ins revealed that 59 percent of the  
17 events occurred without an 811 ticket. This issue continues to be a  
18 challenge because no statutory requirements beyond civil penalties exists,  
19 and homeowners are exempt from the requirement to call 811. The Damage  
20 Prevention Organization continues to explore additional opportunities to  
21 mitigate these challenges. Identifying top dig-in contributors and questioning  
22 those offenders has provided additional risk mitigation opportunities as listed  
23 below:

- 24 • Conducted third-party safe excavation workshops (delivered to  
25 contractors by Dig-In Reduction Team and Locate and Mark);
- 26 • Each contractor involved in a dig-in was offered a free safe excavation  
27 workshop with a focus on plumbing and fencing;
- 28 • In 2023, third-party workshops and second-party at-fault reviews were  
29 just some of the efforts that contributed towards:
  - 30 – Locator At Faults were down 38 percent compared to 2022;
  - 31 – Total Dig-ins were down 14 percent compared to 2022;
  - 32 – Second-Party Dig-ins were down 52 percent compared to 2022;
  - 33 – Third-Party Dig-ins were down 11 percent compared to 2022;

1           – PG&E achieved 1st Quartile for total dig-in, ending the year with a  
2           ratio of 1.01; and

- 3           • No Underground Service Alert (USA) Ticket: social media-Next Door  
4           Posts, reviewed by zip code and compared to same quarter prior year.

5 k) Metric 9 – Shut in Times – Services: Corrective Action/Improved Training

6           As a result of our Continuous Improvement initiatives and with focus on  
7           customer and employee safety, we explored alternatives to improve overall  
8           response and gas flow stop times when responding to distribution facility  
9           damages, including services.

10          Analysis of 2022 service shut-in data indicated that when First  
11          Responders (Field Services Personnel – Gas Service Representatives or  
12          GSRs) can squeeze services there is a 47 percent improvement in overall  
13          gas flow stop median times compared to when Maintenance and  
14          Construction (M&C) crews complete same task. Despite small sample size  
15          of 34 incidents with Squeezed By details, analysis indicated the median time  
16          to stop the flow of gas by GSRs was 26.9 minutes compared to 51.3 minutes  
17          for M&C.

18          Therefore, for 2023, PG&E emphasized the importance of providing  
19          GSRs with service squeeze training to improve overall performance.

20          From a total of 1,273 service damages responded to in 2023:

- 21          • GSRs squeezed 654 (51%) with a median time of 27.4 minutes
- 22          • M&C squeezed 562 (44%) with a median time of 53.1 minutes

23 l) Metric 11 – Gas Emergency Response: Informs Risk-Based Decision Making

24          Gas Emergency Response measures PG&E’s ability to respond with  
25          urgency to hazardous or unsafe situations that may be a threat to customer  
26          and public safety. In some situations, GSRs respond to emergency  
27          situations as first responders. Responding to emergency situations is  
28          PG&E’s highest priority so that PG&E can prevent or ameliorate hazardous  
29          situations. PG&E’s goal is to have a GSR on-site as quickly as possible for  
30          gas immediate response calls. Faster response time to Emergency  
31          Notifications reduces the length of emergent situations. Consistent with  
32          current practice, PG&E treats all customer-reported gas odor calls as  
33          Immediate Response (IR) and will attempt to respond to such calls within 60  
34          minutes. To meet this goal, PG&E utilizes best practices, such as: mobile

1 data terminals, real time Global Positioning Systems, shift coverage 24 hours  
2 a day/seven days a week in specific high-volume areas, and backup on-call  
3 technicians. In 2023, we achieved the highest response time in 8 years and  
4 was made possible by continued focus by our Field Teams and Gas Dispatch  
5 deploying Lean practices, cross collaboration, accountability, focus on  
6 problem solving and initiatives.

7 m) Metric 30 – Gas Over Pressure Events: Informs Risk-Based Decision Making

8 By reviewing Gas Over Pressure Events metric data PG&E has identified  
9 human performance and equipment failure as the two most common causes  
10 for Overpressure events. As result of benchmarking with other utilities and in  
11 alignment with our internal strategic objectives, PG&E presented the Over  
12 Pressure Protection (OPP) Enhancement Program in the 2019 Gas  
13 Transmission and Storage Rate Case, and in both the 2020 and 2023  
14 General Rate Case testimony. By end of 2023, the slam shut valve  
15 installation program (a method of secondary OPP) has installed slam shut  
16 devices at 939 gas distribution stations and 97 gas transmission stations.

17 n) Metric 30 – Gas Over Pressure Events: Corrective Action/Improved  
18 Training.

19 By reviewing Gas Over Pressure Events metric data PG&E has identified  
20 human performance and equipment failure as the two most common causes  
21 for over pressure events. In 2018, PG&E implemented the HU (Human  
22 Performance) Tools and Capability Training series that consisted of  
23 capability building activities with the goal to reduce over pressure events  
24 linked to HU causes. In 2021, 100 percent of supervisors and grassroots  
25 leads were trained. In 2022, PG&E evaluated the clearance process to  
26 determine gaps and improve clearance writing and execution methodology to  
27 prevent over pressure events, and in 2023 a full-time person was assigned to  
28 lead the initiative to improve the development and execution of the clearance  
29 process.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**SECTION 3**  
**BIAS CONTROLS AND METHODOLOGY**

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **2023 SAFETY PERFORMANCE METRICS REPORT**  
3   **SECTION 3**  
4                                   **BIAS CONTROLS AND METHODOLOGY**

5 **I. Bias Controls and Methodology**

6           In general, Pacific Gas and Electric Company (PG&E) utilizes multiple bias  
7 controls and systems to ensure reporting of the metric data cannot be  
8 manipulated or skewed. These controls include:

- 9       • Internal and external auditing;
- 10      • Use of third-party data collection and resources;
- 11      • Use of state mandated reporting to safety regulators such as the  
12       Occupational Safety and Health Administration;
- 13      • Reliance on automated processes such as the Supervisory Control and  
14       Data Acquisition system that actively monitor our gas equipment;
- 15      • Use of database systems such as the Energy Management tool and SAP for  
16       accurate data input;
- 17      • Use of automatically generated change logs for every notification down to  
18       the field-by-field basis to ensure integrity of system controls and retention of  
19       record history;
- 20      • Ensuring that only specific personnel or teams can enter or edit data such  
21       as the Centralized Inspection Review Team;
- 22      • Review of the data by the process team to ensure accuracy;
- 23      • Review of many of the metrics included in this report by Business, Process,  
24       Governance teams, and leadership to discuss performance and take action;  
25       and
- 26      • Regular review by PG&E’s Internal Audit and Law Department of many of  
27       the metrics identified in this report.

28           PG&E has provided a description of the specific bias controls applicable to  
29 each metric in the bias control section within the metric discussion.

30 Individual or Group Performance Tied to Metrics

31           PG&E sets goals annually for employees in our goals system iConnect, that  
32 cascade throughout each Functional Area. For a given year:

33 1) Senior Leaders identify the most significant areas of focus;

- 1        2) Senior Leaders set high level goals (e.g., Short-Term Incentive Plan metrics)
- 2            and provide direction on other areas of focus;
- 3        3) Goal setting is disaggregated and managed within the Functional Area
- 4        4) Downstream leaders set operational goals to meet objectives; and
- 5        5) Goal setting is managed locally.

6            For this report, to determine if a metric is tied to a specific goal PG&E  
7 reviewed all available 2023 goals and metrics for Officers and Directors for the  
8 Enterprise. PG&E met this requirement by searching all Functional Area goals  
9 for each Safety Performance Metrics Report (SPMR) metric name and identified  
10 the officers and Directors with performance goals that are tied to each SPMR  
11 metric.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**SECTION 4**  
**2023 IMPUTED ADOPTED VALUES FOR**  
**SAFETY-RELATED RISK MITIGATION AND CONTROLS**  
**ACTIVITIES**



1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **2023 SAFETY PERFORMANCE METRICS REPORT**  
3   **SECTION 4**  
4                                   **2023 IMPUTED ADOPTED VALUES FOR**  
5 **SAFETY-RELATED RISK MITIGATION AND CONTROLS ACTIVITIES**

6 **IV. 2023 Imputed Adopted Values for Safety-Related and Risk Mitigation and**  
7 **Controls Activities**

8           The total estimated risk mitigation and control spending level as adopted in  
9           the 2023 General Rate Case (GRC) for 2023 and the recorded spend is  
10          provided in Tables 4-1 (expense) and 4-2 (capital) below. Please refer to Pacific  
11          Gas and Electric Company's (PG&E or the Company) 2023 Risk Spending  
12          Accountability Report (RSAR) that will include additional detail on activities  
13          presented in PG&E's 2020 Risk Assessment and Mitigation Phase (RAMP)  
14          Report and 2023 GRC, including variance explanations for those  
15          activities/programs that meet the California Public Utilities Commission's  
16          variance criteria threshold.

**TABLE 4-1**  
**2023 TOTAL SAFETY-RELATED RISK MITIGATION AND CONTROLS IMPUTED ADOPTED**  
**VALUES AND RECORDED COSTS EXPENSE**  
**(THOUSANDS OF DOLLARS)**

Line No.	Functional Area	2023 Imputed Adopted Costs	2023 Actual Costs	Difference for 2023 (\$)	Spending percent Variance for 2023 (%)
1	Gas Distribution	\$438,691.6	\$349,820.6	\$(88,871.0)	(20.3)%
2	Gas Transmission and Storage (GT&S)	525,468.7	448,261.0	(77,207.6)	(14.7)%
3	Electric Distribution	2,168,752.6	2,137,797.1	(30,955.5)	(1.4)%
4	Nuclear Generation	312,572.5	322,033.6	(9,461.07)	(3.0)%
5	Power Generation	239,373.0	200,226.5	39,146.52	16.4%
6	Customer and Communications	54,319.9	49,455.3	(4,864.5)	(9.0)%
7	Shared Services/ Information Technology (IT)	151,398.96	206,946.20	(55,547.25)	(37)%
8	Human Resources (HR)	40,427.0	32,021.5	(8,406.0)	(21)%
9	Total	\$3,931,004.26	\$3,745,561.80	\$(184,442.46)	(4.69)%

Note: This table is comprised of all Major Work Categories (MWC) or Maintenance Activity Types (MAT) that are related to safety -related risk mitigation activities included in the 2023 GRC.

- (1) The Enterprise, Health & Safety (EH&S) imputed adopted and actual costs reflect department costs only. Occupational Health adopted and actual costs are included in Corporate Items at a much higher level of detail for consistency at the Company level.
- (2) Safety, Reliability, and/or Maintenance (SRM) spend in several Shared Service organizations (Transportation & Aviation Services, Sourcing, Corporate Real Estate Strategy and Services (CRESS), and Land & Environmental Management) include investments that support Wildfire mitigations and are recorded in the Wildfire Mitigation Balancing Account, Wildfire Mitigation Plan Memorandum Account (WMPMA), and Fire Risk Mitigation Memorandum Account.
- (3) SRM spend in the CRESS organization also includes investments addressing the move from the San Francisco General Office (SFGO) to the new Oakland General Office (OGO), and are recorded in the General Office Sale Memorandum Account (GOSMA).

**TABLE 4-2**  
**2023 TOTAL SAFETY-RELATED RISK MITIGATION AND CONTROLS**  
**IMPUTED ADOPTED VALUES AND RECORDED COSTS CAPITAL**  
**(THOUSANDS OF DOLLARS)**

Line No.	Functional Area	2023 Imputed Adopted Costs	2023 Actual Costs	Difference for 2023 (\$)	Spending percent Variance for 2023 (%)
1	Gas Distribution	\$776,084.9	\$785,826.6	\$9,741.6	1.3%
2	GT&S	787,305.5	658,440.0	(128,865.5)	(16.4)%
3	Electric Distribution	2,727,103.2	3,319,414.7	592,311.5	21.7%
4	Nuclear Generation	12,314.0	11,014.4	1,299.59	10.6%
5	Power Generation	368,112.2	280,236.1	87,876.09	23.9%
6	Customer and Communications	111,413.5	102,788.9	(8,624.6)	(7.7)%
7	Shared Services/IT	478,137.54	421,515.22	56,622.31	12%
8	HR	1,102.4	539.1	(563.3)	(51)%
9	Total	\$5,261,573.24	\$5,579,775.02	\$318,201.73	6.05%

Note: This table is comprised of all MWCs or MATs that are related to safety-related risk mitigation activities included in the 2023 GRC.

- (1) The EH&S imputed adopted and actual costs reflect department costs only. Occupational Health adopted and actual costs are included in Corporate Items at a much higher level of detail for consistency at the Company level.
- (2) SRM spend in CRESS include investments that support Wildfire mitigations and are recorded in the WMPMA.
- (3) SRM spend in the CRESS organization also includes investments addressing the move from the SFGO to the new OGO and are recorded in the GOSMA.

1            In response to SPD's request, PG&E provides the total 2023 GRC risk  
2            spend for 2023 broken down by RAMP chapter in Tables 4-3 (expense) and 4-4  
3            (capital). PG&E's 2023 RSAR, to be submitted May 31, 2024, will identify all  
4            programs that have SRM activities. The 2023 RSAR will present risk spending  
5            using the organization of risks presented in the 2020 RAMP and will also  
6            separately identify SRM costs that were not directly in the 2020 RAMP.

**TABLE 4-3**  
**2023 TOTAL SAFETY-RELATED RISK MITIGATION**  
**IMPUTED ADOPTED VALUES AND RECORDED COSTS BY RAMP CHAPTER EXPENSE**  
**(THOUSANDS OF DOLLARS)**

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2023 Imputed Adopted Costs	2023 Actual Costs	Difference for 2023 (\$)	Spending percent Variance for 2023 (%)
1	Gas	7	3	Loss of Containment on Gas Transmission Pipeline	\$399,441.7	\$325,547.0	\$(73,546.4)	(2)%
2	Gas	8	3	Loss of Containment on Gas Distribution Main or Service	\$296,256.3	\$240,745.2	\$(55,511.1)	(2)%
3	Gas	9	3	Large Overpressure Event Downstream of Gas Maintenance and Construction (M&C) Facility	\$63,538.9	\$56,626.2	\$(6,912.7)	(1)%
4	Gas	19	3	Loss of Containment at Gas M&C or Compression and Processing (C&P) Facility	\$107,678.8	\$97,610.0	\$(10,068.7)	(1)%
5	Gas	19	3	Loss of Containment on Gas Customer Connected Equipment	\$114,831.5	\$83,029.1	\$(31,802.5)	(3)%
6	Gas	19	3	Loss of Containment at Natural Gas Storage Well or Reservoir	\$41,661.5	\$28,939.2	\$(12,722.2)	(3)%
7	Gas	19	3	Loss of Containment on Liquid Natural Gas (LNG)/Compressed Natural Gas (CNG) Portable Equipment	\$2,650.8	\$3,617.0	\$966.2	(4)%
8	Gas	19	3	Loss of Containment on CNG Station Equipment	\$4,592.7	\$3,453.7	\$(1,139.0)	(2)%
9	Gas	Not in 2020 RAMP	3	Insufficient Capacity to Meet Customer Demand	\$41,172.8	\$30,304.0	\$(10,868.8)	(3)%
10	Gas	Not in 2020 RAMP	3	N/A	\$88,402.3	\$101,449.9	\$13,047.6	1%

**TABLE 4-3**  
**2023 TOTAL SAFETY-RELATED RISK MITIGATION**  
**IMPUTED ADOPTED VALUES AND RECORDED COSTS BY RAMP CHAPTER EXPENSE**  
**(THOUSANDS OF DOLLARS)**  
**(CONTINUED)**

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2023 Imputed Adopted Costs	2023 Actual Costs	Difference for 2023 (\$)	Spending percent Variance for 2023 (%)
11	Electric	10	4	Wildfire	\$1,729,305.4	\$1,622,835.4	\$(106,469)	(6)%
12	Electric	11	4	Failure of Distribution Overhead Assets	\$1,191,918.7	\$1,209,855.3	\$17,396.5	2%
13	Electric	12	4	Failure of Distribution Network Assets	\$5,157.3	\$6,152.8	\$995.5	19%
14	Electric	19	4	Failure of Distribution Underground Assets	\$36,997.7	\$35,311.6	\$(1,686.1)	(5)%
15	Electric	19	4	Failure of Substation Assets	\$24,889.4	\$31,061.4	\$6,162.0	25%
16	Electric	20	4	Cross-Cutting Factors – Emergency Preparedness and Response	\$27,969.5	\$20,541.0	\$(7,428.5)	(27)%
17	Electric	Not in 2020 RAMP	4	N/A	\$191,829.5	\$267,062.6	\$75,233.0	39%
18	Power Generation	13	5	Hydro System Safety – Dams	\$19,147.9	\$12,962.1	\$6,185.8	32.3%
19	Power Generation	Not in RAMP	5	N/A	\$220,225.1	\$187,264.4	\$32,960.7	15.0%
20	Nuclear Generation	Not in RAMP	5	N/A	\$312,572.5	\$322,033.6	\$(9,461.1)	(3.0)%
21	Customer and Comms	Not in RAMP	6	N/A	\$54,319.9	\$49,455.3	\$(4,864.5)	(9.0)%
22	HR	Not in RAMP	8	N/A	\$40,427.0	\$32,080.8	\$(8,346.3)	(21)%
23	EH&S	15, 16, 17, 18	7	Multiple	\$38,433.57	\$38,023.02	\$410.56	1%
24	Transportation & Aviation Services	Not in RAMP	7	N/A	\$5,891.90	\$4,702.15	\$1,189.75	20%
25	Sourcing	Not in RAMP	7	N/A	–	\$3,930.46	\$(3,930.46)	–
26	CRESS	14	7	Real Estate and Facilities Failure	\$46,632.64	\$62,979.91	\$(16,347.26)	(35)%
27	Land & Environmental Management	Not in RAMP	7	N/A	\$2,367.95	\$2,992.22	\$(624.27)	(26)%
28	ERIM	20	7	Cross-Cutting Factors	\$551.19	\$421.95	\$129.24	23%
29	Cyber and Corporate Security	20	7	Cross-Cutting Factors	\$57,521.70	\$55,055.03	\$2,466.68	4%
30	IT	20	7	Cross-Cutting Factors	–	\$38,841.47	\$(38,841.47)	–

**TABLE 4-4**  
**2023 TOTAL SAFETY-RELATED RISK MITIGATION IMPUTED ADOPTED VALUES AND**  
**RECORDED COSTS BY RAMP CHAPTER CAPITAL**  
**(THOUSANDS OF DOLLARS)**

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2023 Imputed Adopted Costs	2023 Actual Costs	Difference for 2023 (\$)	Spending percent Variance for 2023 (%)
1	Gas	7	3	Loss of Containment on Gas Transmission Pipeline	\$480,469.6	\$368,401.1	\$(112,068.5)	(2)%
2	Gas	8	3	Loss of Containment on Gas Distribution Main or Service	\$665,801.5	\$647,663.0	\$(18,138.5)	–
3	Gas	9	3	Large Overpressure Event Downstream of Gas M&C Facility	\$147,896.1	\$178,792.6	\$30,896.4	2%
4	Gas	19	3	Loss of Containment at Gas M&C or C&P Facility	\$291,995.6	\$223,748.0	\$(68,247.6)	(2)%
5	Gas	19	3	Loss of Containment on Gas Customer Connected Equipment	\$2,476.4	\$10,418.5	\$7,942.1	32%
6	Gas	19	3	Loss of Containment at Natural Gas Storage Well or Reservoir	\$93,448.7	\$125,593.8	\$32,145.1	3%
7	Gas	19	3	Loss of Containment on LNG/CNG Portable Equipment	\$4,489.5	\$5,781.0	\$1,291.5	3%
8	Gas	19	3	Loss of Containment on CNG Station Equipment	\$4,889.5	\$3,489.7	\$(1,399.8)	(3)%
9	Gas	Not in 2020 RAMP	3	Insufficient Capacity to Meet Customer Demand	\$53,208.8	\$60,803.2	\$7,594.4	1%
10	Gas	Not in 2020 RAMP	3	N/A	\$999.1	\$6,004.1	\$5,005.0	50%
11	Electric	10	4	Wildfire	\$1,470,524	\$1,995,511.1	\$524,987.6	36%
12	Electric	11	4	Failure of Distribution Overhead Assets	\$1,435,514	\$1,797,224.4	\$361,710.2	25%
13	Electric	12	4	Failure of Distribution Network Assets	\$46,335	\$22,397	\$(23,939)	(52)%

**TABLE 4-4**  
**2023 TOTAL SAFETY-RELATED RISK MITIGATION IMPUTED ADOPTED VALUES AND**  
**RECORDED COSTS BY RAMP CHAPTER CAPITAL**  
**(THOUSANDS OF DOLLARS)**  
**(CONTINUED)**

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2023 Imputed Adopted Costs	2023 Actual Costs	Difference for 2023 (\$)	Spending percent Variance for 2023 (%)
14	Electric	19	4	Failure of Distribution Underground Assets	\$161,068	\$117,800	\$(43,268)	(27)%
15	Electric	19	4	Failure of Substation Assets	\$131,265	\$80,947	\$(50,318)	(38)%
16	Electric	20	4	Cross-Cutting Factors – Emergency Preparedness and Response	5,932	4,596	(1,336)	(23)%
17	Electric	Not in 2020 RAMP	4	N/A	776,589	1,004,085	227,496	29%
18	Power Generation	13	5	Hydro System Safety – Dams	\$123,123.2	\$42,834.2	\$80,289.0	65.2%
19	Power Generation	Not in RAMP	5	N/A	\$244,989.1	\$237,402.0	\$7,587.1	3.1%
20	Nuclear Generation	Not in RAMP	5	N/A	\$12,314.0	\$11,014.4	\$1,299.6	10.6%
21	Customer and Comms	Not in RAMP	6	N/A	\$111,413.5	\$102,788.9	\$(8,624.6)	(7.7)%
22	HR	Not in RAMP	8	N/A	\$1,102.4	\$539.1	\$(563.3)	(51)%
23	CRESS	14	7	Real Estate and Facilities Failure	\$140,796.84	\$127,869.04	\$12,927.79	9%
23	ERIM	20	7	Cross-Cutting Factors	\$2,204.76	\$4,891.23	\$(2,686.47)	(122)%
24	Cyber and Corporate Security	20	7	Cross-Cutting Factors	\$47,524.75	\$43,233.94	\$4,290.81	9%
25	IT	20	7	20: Cross-Cutting Factors	\$286,508.81	\$245,521.02	\$40,987.80	14%
26	EH&S	15, 16, 17, 18	7	Third-Party Safety Incident Employee Safety Incident Contractor Safety Incident Motor Vehicle Safety Incident	\$1,102.38	–	–	0%

Note: These values may not align with PG&E's final 2023 RSAR since the 2023 RSAR will be submitted on May 31, 2024, after the submission of this report. All values are from the 2020 RAMP as updated in the 2023 GRC. Values should not be totaled. Some costs mitigate multiple risks and therefore are reflected in more than one 2020 RAMP chapter (e.g., double counted due to the nature of how mitigation activities function).

(a) Activities in this category are related to wildfire.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**SECTION 5**  
**SAFETY PERFORMANCE METRICS**



1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **2023 SAFETY PERFORMANCE METRICS REPORT**  
3   **SECTION 5**  
4                                   **SAFETY PERFORMANCE METRICS**

5   **V. Safety Performance Metrics**

6       **Metric 1: T&D Overhead Wires Down Non-Major Event Days**

7       **Metric Name and Description:** T&D Overhead Wires Down Non-Major Event  
8       Days – Number of instances where an electric transmission or primary  
9       distribution conductor is broken, or remains intact, and falls from its intended  
10      position to rest on the ground or a foreign object; a conductor is considered  
11      energized unless confirmed in an idle state (i.e., de-energized); excludes down  
12      secondary distribution wires and “Major Event Days” (MED) (typically due to  
13      severe storm events) as defined by the Institute of Electrical and Electronics  
14      Engineers (IEEE) Standard 1366.

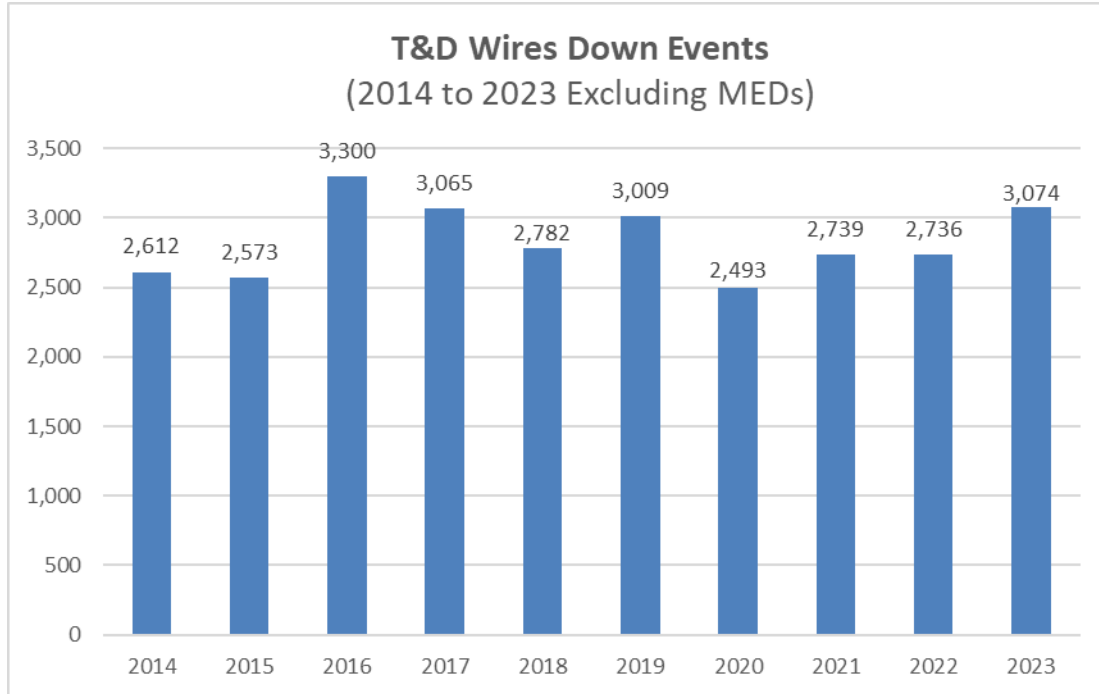
15      **Risks:** Wildfire, Failure of Electric Transmission Overhead Assets, and Failure  
16      of Electric Distribution Overhead Assets

17      **Category:** Electric

18      **Units:** Number of wire down events

1 **Summary:**

**FIGURE 5-1  
T&D OVERHEAD WIRES DOWN METRIC DATA EXCLUDING MEDS (ANNUAL)**



**Historical Number of MEDs**

2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
5	10	3	30	7	31	14	25	5	20

Note: The data in this figure is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

2 **Narrative Context:** In 2012, PG&E initiated the Wires Down Program (including  
 3 introduction of the wires down metric) to address the Company's increased  
 4 focus on public safety by reducing the number of conductors that fail and result  
 5 in a contact with the ground, a vehicle, or other object. Before 2012, wires down  
 6 data was collected in the OUTAGE and ESLIC databases but not tracked or  
 7 used as a metric. As part of the Wires Down Program, in an effort to identify and  
 8 mitigate the root cause of wires down incidents, Electric Operations  
 9 implemented a program to visit wires down locations to gather essential data,  
 10 understand the cause, and develop work plans to mitigate future wires down  
 11 incidents.

1 Significant work has been performed to reduce wires down, including  
2 replacing overhead conductors, vegetation clearing, hardening of distribution  
3 circuits, infrared inspections of overhead lines to identify and repair hot spots,  
4 and investigating wire down incidents and implementing learnings/corrective  
5 actions.

6 PG&E's Vegetation Management team conducts site visits of  
7 vegetation-caused wires-down events as part of its standard tree-caused service  
8 interruption investigation process. The data obtained from site visits supports  
9 efforts to reduce future vegetation-caused wires-down events. The data  
10 collected from these investigations also helps identify failure patterns by tree  
11 species that are associated with wires-down events.

12 2023 experienced 3,074 wire down events compared to 2,736 in 2022, a  
13 12 percent increase. 2023 performance was not in line with the 10-year  
14 historical average of 2,838 due to the historical atmospheric river weather events  
15 incurred in Q1 2023. Improvements have been made to the wires down forecast  
16 model to include weather day and non-weather day information to better  
17 understand events not related to weather. This provided better insights to blue  
18 sky day conductor performance and improved forecasting performance.

19 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
20 **or Higher) Compensation Levels and/or Incentives?**

21 No, in 2023, T&D Overhead Wires Down Non-Major Event Days is not a  
22 STIP metric.

23 **Is Metric Linked to the Determination of Individual or Group Performance**  
24 **Goals?**

25 No, T&D Overhead Wires Down is not linked to 2023 individual or group  
26 performance goals for Director-level, or higher, positions.

27 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

28 No, T&D Overhead Wires Down is not linked to 2023 individual performance  
29 goals for Director-level, or higher, positions.

30 **Bias Controls:** Internal Auditing performed a validation of the 2023 metric  
31 performance. The wires down events are reported by field and control center  
32 personnel per uniform reporting guidelines as the events occur.

- 1 • Engineers conduct post wire down event reviews (typically for the non-MED  
2 events) and will initiate corrections to the data via the outage quality team to  
3 ensure the reporting guidelines were followed and the records align with  
4 information reported by repair crews.
- 5 • The outage quality team processes all valid change requests received and  
6 also initiates corrections based on their reviews and findings of the collected  
7 outage information.

8 **Rate Case Safety Goal Progress:** The T&D Wires Down metric (excluding  
9 downed secondary distribution wires and MEDs) is not a 2023 GRC or 2020  
10 RAMP stated safety goal.

11 Significant work was performed to reduce wires down, including replacing  
12 overhead conductor, vegetation clearing, hardening of distribution circuits,  
13 infrared inspections of overhead lines to identify and repair hot spots,  
14 investigating wires down incidents, and implementing learnings/corrective  
15 actions.

16 **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 2: Transmission and Distribution (T&D) Overhead Wires Down –**  
2 **Major Event Days (MED)**

3 **Metric Name and Description:** T&D Overhead Wires Down – MEDs – Number  
4 of instances where an electric transmission or primary distribution conductor is  
5 broken, or remains intact, and falls from its intended position to rest on the  
6 ground or a foreign object; a conductor is considered energized unless  
7 confirmed in an idle state (i.e., de-energized). Includes MEDs (typically due to  
8 severe storm events) as defined by the Institute of Electrical and Electronics  
9 Engineers (IEEE) Standard 1366.

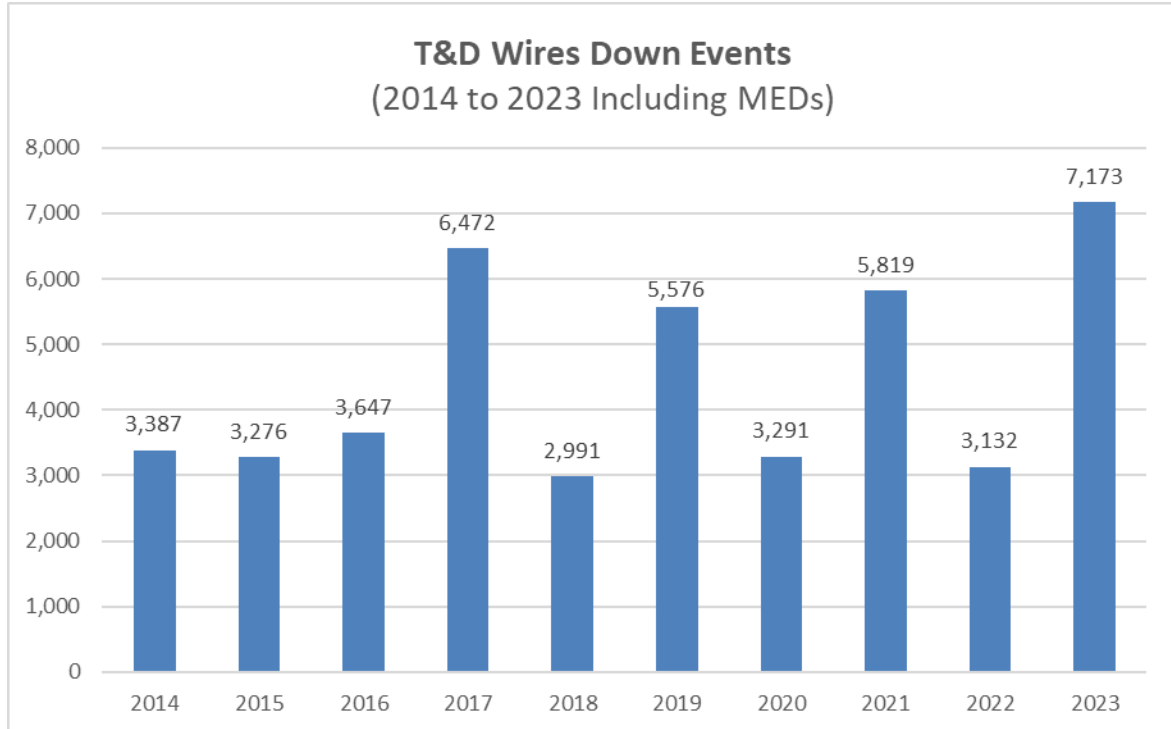
10 **Risks:** Wildfire, Failure of Electric Transmission Overhead Assets, and Failure  
11 of Electric Distribution Overhead Assets

12 **Category:** Electric

13 **Units:** Number of wire down events

1 **Summary:**

**FIGURE 5-2  
T&D OVERHEAD WIRES DOWN METRIC DATA (ANNUAL)**



**Historical Number of MEDs**

2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
5	10	3	30	7	31	14	25	5	20

Note: The data in this figure is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

2 **Narrative Context:** The metric, inclusive of MEDs is not being used for internal  
3 reporting purposes. PG&E focuses on transmission and primary distribution  
4 conductor wire down events, excluding MEDs. As can be seen in the data  
5 above, particularly in 2017, 2019, 2021, and 2023 the results for this metric  
6 fluctuate heavily based on the number of severe weather event days in a  
7 particular year. PG&E uses the IEEE 1366 Standard titled IEEE Guide for  
8 Electric Power Distribution Reliability Indices to define and apply excludable  
9 MEDs to measure the performance of its electric system under normally  
10 expected operating conditions. Its purpose is to allow major events to be  
11 analyzed apart from daily operation and avoid allowing daily trends to be hidden  
12 by the large statistical effect of major events. Per the Standard, the MED

1 classification is calculated from the natural log of the daily System Average  
2 Interruption Duration Index (SAIDI) values over the past five years. The SAIDI  
3 index is used as the basis since it leads to consistent results and is a good  
4 indicator of operational and design stress. Given the fluctuations in this metric  
5 from weather patterns, PG&E does not view it as an appropriate metric to  
6 properly assess system performance or improvement.

7 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
8 **or Higher) Compensation Levels and/or Incentives?**

9 No, in 2023, T&D Overhead Wires Down–MEDs was not used as a STIP  
10 metric.

11 **Is Metric Linked to the Determination of Individual or Group Performance**  
12 **Goals?**

13 No, T&D Overhead Wires Down–MEDs is not linked to 2023 individual or  
14 group performance goals for Director-level, or higher, positions.

15 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

16 No, T&D Overhead Wires Down–MEDs is not linked to 2023 individual  
17 performance goals for Director-level, or higher, positions.

18 **Bias Controls:** Internal Auditing performed a validation of the 2023 metric  
19 performance. The wires down events are reported by field and control center  
20 personnel per uniform reporting guidelines as the events occur.

- 21 • Engineers conduct post wire down event reviews (typically for the non-MED  
22 events) and will initiate corrections to the data via the outage quality team to  
23 ensure the reporting guidelines were followed and the records align with  
24 information reported by repair crews.
- 25 • The outage quality team processes all valid change requests received and  
26 also initiates corrections based on their reviews and findings of the collected  
27 outage information.

28 **Rate Case Safety Goal Progress:** The T&D Wires Down metric (including  
29 MEDs) is not a 2023 GRC or 2020 RAMP stated safety goal.

30 Significant work was performed to reduce wires down, including replacing  
31 overhead conductor, vegetation clearing, hardening of distribution circuits,

1 infrared inspections of overhead lines to identify and repair hot spots,  
2 investigating wires down incidents, and implementing learnings/corrective  
3 actions.

4 **Monthly Data:** See Attachment A at the end of this report.



1       **Metric 3: Electric Emergency Response Time**

2       **Metric Name and Description:** Electric Emergency Response Time –  
3       Average time and median time in minutes to respond on-site to an electric  
4       related emergency notification from the time of notification to the time a  
5       representative (or qualified first responder) arrived onsite. Emergency  
6       notification includes all notifications originating from 911 calls and calls made  
7       directly to the utilities’ safety hotlines. The data used to determine the average  
8       time and median time shall be provided in increments as defined in (GO) 112-F  
9       123.2 (c) as supplemental information, not as a metric.

10      **Risks:** Wildfire, Overhead Conductor, Public Safety, Worker Safety<sup>1</sup>

11      **Category:** Electric

12      **Units:** The time in minutes that an electric crew person or a qualified first  
13      responder takes to respond after receiving a call which results in an emergency  
14      order.

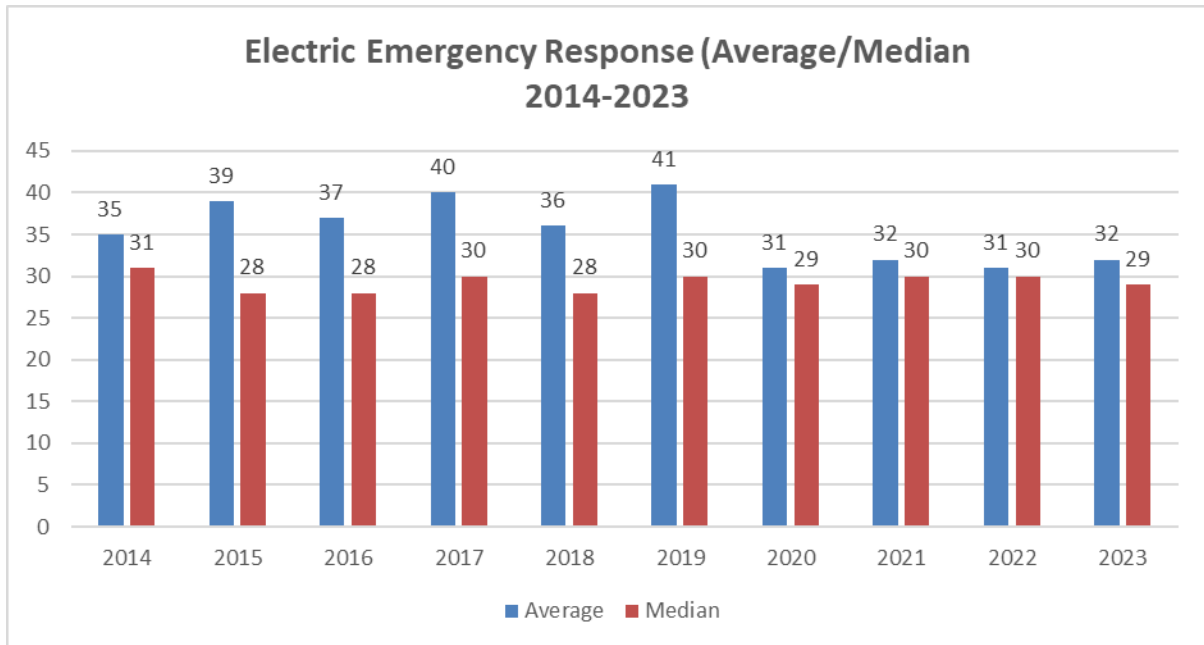
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1      The Corporate Risk Register now has the following risks: (1) Wildfire, (2) Electric Transmission System-Wide Blackout, (3) Failure of Electric Distribution Overhead Assets, (4) Failure of Electric Distribution Underground Assets (5) Failure of Electric Transmission Overhead Assets, (6) Failure of Electric Distribution Substation Assets, (7) Failure of Electric Transmission Underground Assets (8) Failure of Electric Transmission Substation Assets, (9) Failure of Electric Distribution Network Assets, (10) Emergency Preparedness and Response.

1

**Summary:**

**FIGURE 5-3  
ELECTRIC EMERGENCY RESPONSE TIME (AVERAGE AND MEDIAN)  
(ANNUAL)**



2

**Narrative Context:** PG&E’s response to 911 calls and the amount of time it takes field resources to respond to those calls is primary performance metric used to evaluate PG&E’s commitment to public safety. There is a direct linkage between public safety and a utility’s response to emergency situations, which is why PG&E selected emergency response time for this element of the performance metric.

3

The keys to performing well on this metric are accurately predicting when large volumes of calls will come in (based on weather forecasts) and ensuring there are enough resources on hand to respond to all calls. This requires coordinating across departments (like Electric and Gas Operations) to share resources to respond when high volumes of 911 calls are anticipated. These tactics are especially important during stormy weather; high call volume during bad weather days may vary from year-to-year.

4

Metric performance has been driven by proactive scheduling of resources for 911 response, coordination across multiple functional areas on training and availability of resources for weather days and improved understanding of shifts

5

1 in storm fronts and impacts on the system. Additional actions include faster  
2 resource notification, utilization of GPS to integrate vehicle and the 911 standby  
3 tag locations and use of supplemental (non-traditional) resources.

4 PG&E's average response to 911 electric-related emergencies improved by  
5 9 percent and median response time improved by 7 percent from 2014-2023. In  
6 2023, PG&E's median showed a reduction of one minute and average response  
7 time showed an increase of one minute compared to 2022 performance. First  
8 quartile response times were also maintained.

9 PG&E began benchmarking its response to 911 calls with other utilities in  
10 2012. PG&E's 2011 performance was 3rd quartile, improving to 2nd quartile in  
11 2012-2014, and reaching 1st quartile in 2015. Since 2015, PG&E's historical  
12 performance has been within the first quartile and best-in-class in some years.

13 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
14 **or Higher) Compensation Levels and/or Incentives?**

15 Yes, Electric Emergency Response Time (within 60 minutes) was used as a  
16 STIP metric for 2023.

17 **Is Metric Linked to the Determination of Individual or Group Performance**  
18 **Goals?**

19 Yes, Electric Emergency Response Time (within 60 minutes) is linked to  
20 2023 performance goals for one or more Director-level, or higher, position.

21 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

22 Yes, Electric Emergency Response Time (within 60 minutes) is linked to all  
23 individual goals as part of 2023 STIP plan. In addition, this metric may be  
24 included as part of an individual's performance goals.

25 **Bias Controls:** The metric performance data is captured and stored in the  
26 Outage Information System (OIS) database. Each 911 call has a time stamp.  
27 The start time of a 911 call involves receipt by utility personnel and entry into the  
28 OIS database (creation of a tag). The tag is created in the OIS database when  
29 the PG&E personnel is on the phone with the 911 dispatch agency (there is a  
30 direct 911 stand-by line into Gas dispatch, where all 911 stand-by calls are  
31 routed). This process removes the delay between the time the call is received  
32 and entered into the system. IA performed a validation of the 2023 metric

1 performance and periodically validated the controls in 2023 in place for  
2 gathering metric data and the Utility's performance in meeting the metric.

3 **Rate Case Safety Goal Progress:** This safety metric does not support a 2023  
4 General Rate Case (GRC) safety goal. See 2023 GRC (Application 21-06-021)  
5 Exhibit 4 Chapter 5 for a complete description of PG&E's Emergency  
6 Preparedness and Response for Electric Distribution.

7 **Monthly Data:** See Attachment A at the end of this report.

1       **Metric 4: Fire Ignitions**

2       **Metric Name and Description:** Fire Ignitions – The number of fire incidents  
3       annually reportable to the California Public Utilities Commission (CPUC) per  
4       Decision (D.) 14-02-015.

5       **Risks:** Failure of Electric Distribution Overhead Assets (no Enhanced Powerline  
6       Safety Settings), Failure of Electric Transmission Overhead Assets, Failure of  
7       Electric Distribution Underground Assets, Failure of Electric Transmission  
8       Underground Assets, Wildfire, Employee Safety Incident, Contractor Safety  
9       Incident, Third-Party Risk.<sup>2</sup>

10      **Category:** Electric

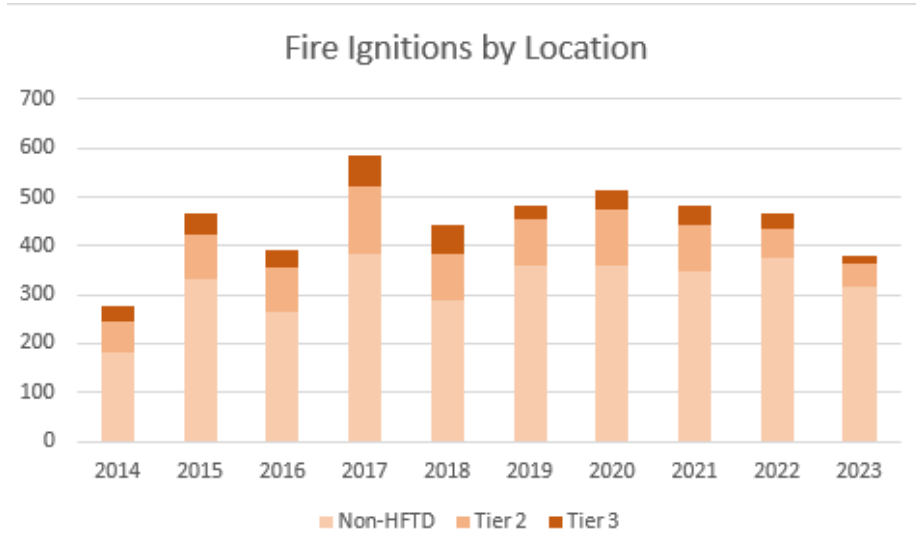
11      **Units:** Number of reportable ignitions.

12      **Summary:**

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2       The Corporate Risk Register now has the following risks: (1) Wildfire, (2) Electric Transmission System-Wide Blackout, (3) Failure of Electric Distribution Overhead Assets, (4) Failure of Electric Distribution Underground Assets (5) Failure of Electric Transmission Overhead Assets, (6) Failure of Electric Distribution Substation Assets, (7) Failure of Electric Transmission Underground Assets (8) Failure of Electric Transmission Substation Assets, (9) Failure of Electric Distribution Network Assets, (10) Emergency Preparedness and Response.

**FIGURE 5-4A  
FIRE IGNITION METRIC DATA (ANNUAL)<sup>3</sup>**



**TABLE 5-4B  
FIRE IGNITIONS METRIC DATA BY LOCATION (ANNUAL)**

Year	Non-HFTD	Tier 2	Tier 3	Zone 1	Total
2014	181	64	32		277
2015	332	91	42		465
2016	267	88	36		391
2017	383	139	62		584
2018	288	95	61		444
2019	361	92	28		481
2020	361	115	38		514
2021	347	95	39		481
2022	377	59	30		466
2023	315	50	14	0	379

Note: This data reflects minor changes to the historic count of reportable ignitions. In 2023, Pacific Gas and Electric Company (PG&E) reviewed and reattributed all ignitions in our ignition record to improve data completeness and accuracy for risk assessment purposes. Please see PG&E's Risk Assessment Improvement Plan item RE-01 in PG&E's 2023 – 2025 Wildfire Mitigation Plan.

<sup>3</sup> This report reflects 2 ignitions in 2023 that meet Electric Incident Report criteria, defined by Appendix B to CPUC D.06-04-055, for which PG&E has not formed a conclusion about the origin or cause.

1 **Narrative Context:** Reportable Fire Ignitions is a primary metric used to  
2 evaluate PG&E’s commitment to public safety. This metric tracks the number of  
3 fire ignitions associated with electrical assets that meet the CPUC definition in  
4 D.14-02-015 within PG&E’s service territory. PG&E began tracking this data in  
5 July 2014. The data is collected from multiple sources and validated through our  
6 Fire Incident Data Collection Processes (RISK-6306S/P):

- 7 • The Field Applications System (FAS) provides ignition information from Field  
8 Operations employee’s as they respond to Field Orders. When a Field  
9 Operation employee arrives at an incident location and identifies signs that  
10 an ignition occurred, Field Operations selects “Yes” in the “Fire Incident”  
11 field of their mobile device. This then opens an “Ignitions” tab where the  
12 Field Operations enters information related to the ignition, including the fire  
13 location, suppressing agency information, whether media is on site, if the fire  
14 was extinguished, suspected cause, equipment ID numbers, weather, facility  
15 impacted, estimated wind, event element, fire size, type of construction, and  
16 evidence collected. Field Operations also attaches pictures to the Field  
17 Order. This information is received by the Ignition Investigation team who  
18 quality check (QC) and further investigate the ignitions.
- 19 • The Fire Host Form is an application used by all field operations to report  
20 ignition events associated to or potentially associated to PG&E electrical  
21 facilities, regardless of the fire/ignition size. With the Fire Host form a field  
22 order is not necessary for field operations to report a fire/ignition. The fire  
23 host form is used by field operations to provide information related to the  
24 ignition, similar to the “Field Application System.”
- 25 • The Transmission Outage Tracking and Logging system provides  
26 information about any planned or unplanned outages on Transmission and  
27 Substation assets. The information is logged into office items reports, work  
28 cards, interruption reports, log details and notifications by the Grid Control  
29 Operators. The Ignition Investigation team perform daily reviews of these  
30 records/reports to identify any potential ignition related events.
- 31 • Trans-Sub Update Emails are email sent by the Transmission Grid Control  
32 Center regarding “trouble” or “force-outs” or “interruptions” that may mention  
33 if an ignition occurred as a result. The Ignition Investigation team perform  
34 daily reviews of these emails to identify any potential ignition related events.

- 1 • The Integrated Logging Information System (ILIS)/Outage Information  
2 System (OIS) systems contain information related to outages and switching  
3 to restore customers that were de-energized due to an equipment failure or  
4 electric incident. This information applies only to ignitions that result in an  
5 outage and contains information about the fault, potential causes of the fault,  
6 location and circuit information, customers affected by the outage, and steps  
7 and times to restore power to affected customers.
- 8 • The information received from these systems goes through a thorough  
9 investigation process. This process ensures that all required information for  
10 an event is received shortly after the event has occurred, and also ensures  
11 the ignition data is complete and accurate. The information is received by  
12 the Ignition Investigation team and entered into the Ignitions Database. The  
13 Ignition Investigations team then verifies the fire location, High Fire Threat  
14 District (HFTD), event element, suspected initiating cause and other fields.  
15 The Ignition Investigation team also communicates with Field Operations  
16 and responding fire agency incident leads to gather additional information on  
17 the incident.
- 18 • Discrepancies identified in our system of records  
19 (ILIS/OIS/FAS/Transmission Operation Tracking and Logging) are corrected  
20 during this investigation phase.
- 21 • The data is also sent to the appropriate Asset Family Owners to help those  
22 teams identify and address failure trends and align mitigation strategies with  
23 areas of risk. This data is also utilized to inform the wildfire risk model.

24 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
25 **or Higher) Compensation Levels and/or Incentives?**

26 Yes, Fire Ignitions was used as a STIP metric for 2023.

27 **Is Metric Linked to the Determination of Individual or Group Performance**  
28 **Goals?**

29 Yes, Fire Ignitions is linked to 2023 group performance goals for one or  
30 more Director-level, or higher, position.



1 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

2 Yes, Fire Ignitions is linked to all individual goals as part of 2023 STIP plan.  
3 In addition, this metric may be included as part of an individual's performance  
4 goals.

5 **Bias Controls:** The Ignition Investigation team has a documented and  
6 transparent ignition analysis process to ensure that all required information for  
7 an event is received shortly after the event occurred, is complete, and is  
8 accurate. IA performed a validation of the 2023 metric performance and  
9 periodically validated the controls in 2023 in place for gathering metric data and  
10 the Utility's performance in meeting the metric.

11 **Rate Case Safety Goal Progress:** While this metric was not a stated safety  
12 goal in the 2023 General Rate Case (GRC), PG&E tracks the number of fires  
13 (ignitions) as a key performance indicator in our Short Term Incentive Plan and  
14 as part of other external commitments, like the Safety Operation Metrics 3.13,  
15 3.14, 3.15, and 3.16 PG&E's 2023 GRC testimony<sup>4</sup> discussed planned work to  
16 mitigate the risk of wildfires and indicated that the controls for this risk will  
17 continue to be strengthened in the future due to the increasing severity of  
18 drought conditions and climate change, the size of PG&E's electric system, and  
19 the quantity and diversity of trees in the Company's service territory.

20 **Monthly Data:** See attachment A at the end of this report.

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<sup>4</sup> See 2023 (Application 21.06.021) GRC Exhibit (PG&E-4), Chapter 4-4.6 (Wildfire Risk and Policy Overview) for a complete description of PG&E's wildfire controls and mitigations. See also Chapter 9 for a description of PG&E's Vegetation Management program. All referenced testimony is to PG&E February 25, 2022 update to the 2023 GRC testimony.

1 **Metric 5: Third party Gas Dig-In**

2 **Metric Name and Description** The number of third-party gas dig-ins per 1,000  
3 Underground Service Alert (USA) tags/tickets received for gas. The ticket count  
4 excludes fiber and electric tickets. A gas dig-in refers to any impact or exposure  
5 that results in the need to repair an underground facility due to a weakening or  
6 the partial or complete destruction of the facility, including, but not limited to, the  
7 protective coating, lateral support, cathodic protection or the housing for the line  
8 device or facility. A third-party dig-in is damage caused by someone other than  
9 the utility or a utility contractor.

10 The Company participates in a one-call “811” public service program  
11 administered by USA. USA provides the Company notification of activities that  
12 could be damaging to the Company’s gas pipelines. These notifications are  
13 referred to as USA tickets. A ticket is the receipt of information by the Company  
14 from USA regarding onsite meetings, project designs, or a planned excavation.  
15 The ticket component of this metric includes Pacific Gas and Electric Company  
16 (PG&E) gas tickets received from all parties (i.e., first-, second-, and  
17 third-parties).

18 **Risks:** Loss of Containment (LoC) on Gas Transmission Pipeline; LoC on Gas  
19 Distribution Main or Service<sup>5</sup>

20 **Category:** Gas

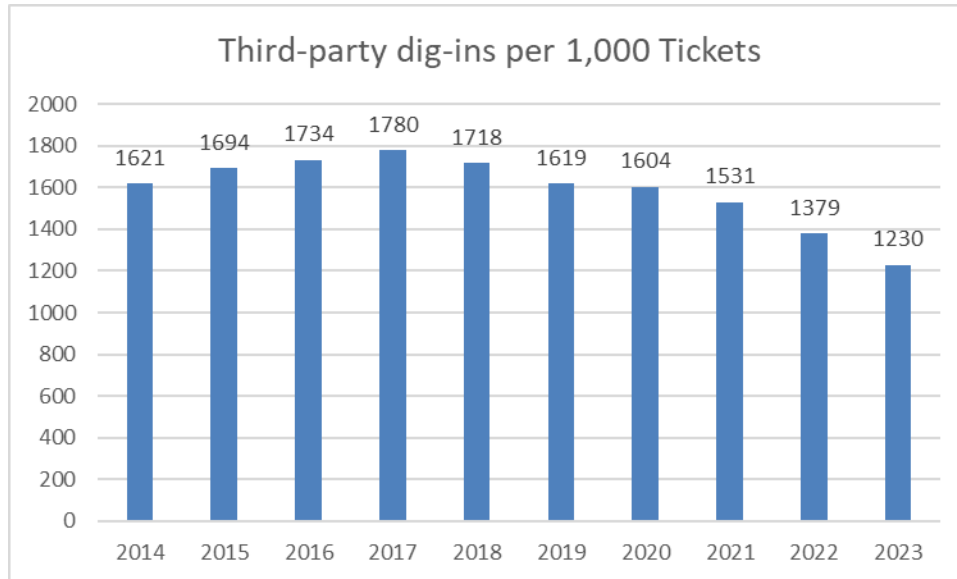
21 **Units:** The number of third-party gas dig-ins per 1,000 USA tags/tickets.

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5 The Corporate Risk Register now has the following risks: LoC on Gas Transmission Pipeline; LoC on Gas Distribution Main or Service.

1 **Summary:**

**FIGURE 5-5  
THIRD-PARTY DIG-INS PER 1,000 TICKETS (ANNUAL)**



2 **Narrative Context:** There has been a downward trend in the number of  
3 third-party dig-ins since 2017. A key contributor to the steady decline in dig-ins  
4 is attributed to increased participation in PG&E’s Safe Excavation Workshops.  
5 From 2019-2023, PG&E has conducted 1,024 Safe Excavation workshops  
6 providing training to 16,926 contractors. Additionally, PG&E has noted a  
7 49 percent reduction in the number of repeat offenders, (contractors with 2 or  
8 more dig-ins in a single year).

9 To continuously focus on improving performance, metric results are reported  
10 monthly and reviewed at leadership meetings and weekly huddles to discuss  
11 results and actions to take, as needed.

12 **Is Metric Used for the Purposes of Determining Executive (Director Level  
13 or Higher) Compensation Levels and/or Incentives?**

14 Yes, Gas Dig-In was used as a STIP metric for 2023.

15 **Is Metric Linked to the Determination of Individual or Group Performance  
16 Goals?**

17 Yes, Gas Dig-In is linked to 2023 group performance goals for one or more  
18 Director-level, or higher, position.

1 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

2 Yes, Gas Dig-In is linked to all individual goals as part of 2023 STIP plan. In  
3 addition, this metric may be included as part of an individual's performance  
4 goals.

5 **Bias Controls:** All dig-ins are reviewed by the Damage Prevention team to  
6 determine appropriate delineation of first-party, second-party, or third-party  
7 dig-in. Total USA tickets are determined by the California one-call system,  
8 independent to PG&E.

9 The metric definition for this metric including targets, target setting  
10 methodology, and exclusions, is documented and approved by Gas Operations  
11 Leadership. Metric results are reported monthly by the Gas Operations  
12 Business Process Governance team and reviewed at leadership meetings to  
13 discuss performance and act as needed. In the event that there is a resulting  
14 need for budget changes, approval must be obtained from the Gas Operations  
15 and Engineering Leadership team at the Enterprise-driven Project Delivery  
16 Center Change Control Forum.

17 On a quarterly basis, a supporting documentation package is prepared by  
18 the Damage Prevention team, reviewed by the Business Process Governance  
19 team, and then routed for Gas Operations Senior Leadership approval. The  
20 support packages are also reviewed quarterly by Compensation and by Internal  
21 Audit who performed a validation of the 2023 metric performance and  
22 periodically validated the controls in 2023 in place for gathering metric data and  
23 the Utility's performance in meeting the metric.

24 **Rate Case Safety Goal Progress:** This metric supports and reflects progress  
25 in PG&E's safety goal described in the 2023 General Rate Case (GRC) of dig-in  
26 prevention for the safety of PG&E employees, PG&E's contractors, and the  
27 public at large by reduced dig-ins per 1,000 tickets.<sup>6</sup>

28 Specific Damage Prevention and Public Safety programs and initiatives that  
29 contribute to dig-in reduction included in the 2023 GRC were: (1) Locate and  
30 Mark; (2) Standby Governance; (3) the Dig-in Reduction Team; (4) updates to  
31 the Locate and Mark Field Guide to provide clear instruction around critical

---

6 See 2023 GRC Exhibit (PG&E-3), pp. 8-15 to 8-16.

1 processes for locating underground assets, including troubleshooting of difficult  
2 to locate facilities; (5) continued participation in the Gold Shovel Standard which  
3 PG&E began but is now run by a third-party and available to utilities and  
4 excavators across the nation; and, (6) the 811 Ambassador program which  
5 utilizes all PG&E employees to properly identify unsafe excavation activities.<sup>7</sup>

6 **Monthly Data:** See Attachment A at the end of this report.

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<sup>7</sup> See 2023 GRC Exhibit (PG&E-3), pp. 8-10 to 8-15.

1 **Metric 6: Gas In-Line Inspection (ILI)**

2 **Metric Name and Description:** Gas ILI – Total miles of transmission pipe  
3 inspected annually by ILI and percentage of transmission pipelines inspected  
4 annually by inline inspections.

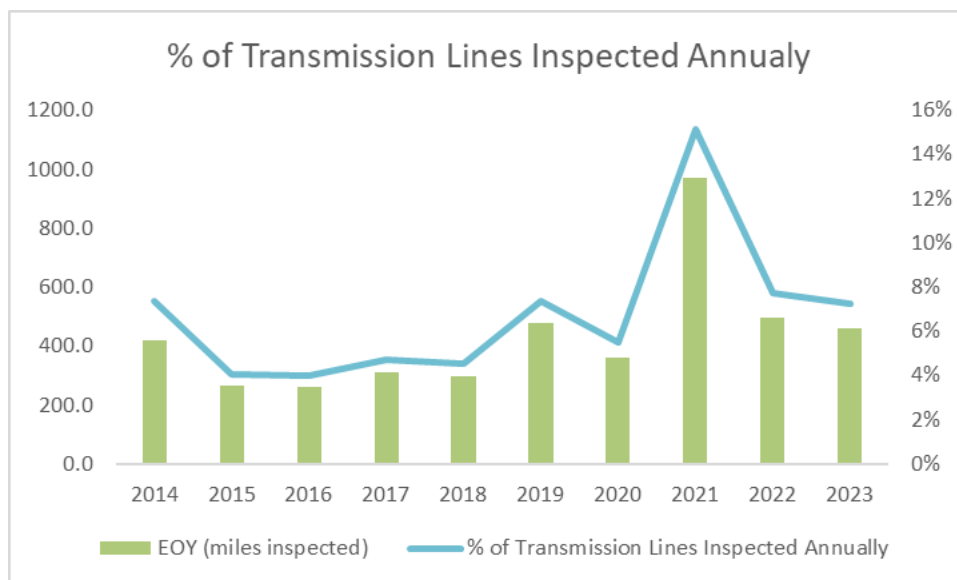
5 **Risks:** Loss of Containment (LoC) on Gas Transmission Pipeline<sup>8</sup>

6 **Category:** Gas

7 **Units:** Total number of miles of inspections performed and percentage  
8 inspected by ILI annually.

9 **Summary:**

**FIGURE 5-6  
MILES OF PIPELINE INSPECTED (ANNUAL)**



10 **Narrative Context:**

11 This metric measures Pacific Gas and Electric Company’s (PG&E) ILI work  
12 completed, including activities that exceed current code requirements. After the  
13 pipeline is upgraded to accommodate an ILI tool, cleaning and inspections are  
14 conducted to collect data about the pipe. This data is analyzed for pipeline  
15 anomalies that must be remediated through the Direct Examination and Repair  
16 process where the anomaly is exposed, examined, and repaired, as necessary.

---

<sup>8</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LoC) on Gas Transmission Pipeline

1 The information from Direct Examination and Repair is used to generate  
2 additional prevention/mitigation activities to improve the long-term safety and  
3 reliability of the pipeline.

4 Total miles of pipeline in-line inspected with traditional ILI tools vary by year  
5 and are correlated with miles of pipeline upgraded and required re-inspection  
6 miles. Decision 11-06-017, as codified by Public Utilities Code Section 958,  
7 requires natural gas transmission pipelines in California to be capable of ILIs,  
8 where warranted. In addition, both Title 49 of the Code of Federal Regulations –  
9 Transportation Part 192, Subpart O, and PG&E’s traditional ILI Program  
10 procedures requires reassessments, which drive the required ILI re-inspection  
11 miles in a given year. Further, ILI is the most reliable pipeline integrity  
12 assessment tool currently available to natural gas pipeline operators to assess  
13 the internal and external condition of transmission line pipe. The number of  
14 miles upgraded each year is based on a number of factors such as: individual ILI  
15 run lengths, risk identified on each ILI run, compliance due dates from identified  
16 threat(s), balancing of system hydraulics and resources. In 2023, PG&E  
17 inspected a total of 461.5 miles of pipe.

18 To continuously focus on improving performance, metric results are reported  
19 monthly and reviewed at leadership meetings and weekly huddles to discuss  
20 results and take action as needed. Performance in 2023 was on target. As  
21 noted above, the number of miles in-line inspected vary by year and are  
22 correlated with miles of pipeline upgraded and required re-inspection miles.

23 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
24 **or Higher) Compensation Levels and/or Incentives?**

25 No, in 2023, Gas ILI metric was not used as a STIP metric.

26 **Is Metric Linked to the Determination of Individual or Group Performance**  
27 **Goals?**

28 No, Gas ILI is not linked to 2023 individual or group performance goals for  
29 one or more Director-level, or higher, positions.

1 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

2 No, Gas ILI is not linked to 2023 individual performance goals for  
3 Director-level, or higher, positions.

4 **Bias Controls:** Metric results are reported monthly in the Centralized Metrics  
5 Repository (CMR), facilitated by the Operations Support, Reporting and  
6 Analytics team, and performance is reviewed monthly at Operating Reviews.  
7 Any required leadership support is requested in these Reviews.

8 **Rate Case Safety Goal Progress:** This metric supports PG&E’s safety goal  
9 described in the 2023 GRC of approximately 69 percent of its system being  
10 capable of Traditional ILI by the end of 2036 with the first time ILI completed the  
11 following year, 2037. In addition, pipeline sections that have had a baseline ILI  
12 inspection must be reassessed within 7 years, following the requirements of  
13 Subpart O and PG&E’s procedures.<sup>9</sup> However, it should be noted the 2023  
14 GRC Final Decision (D.23-11-069) adopted an ILI inspection forecast that  
15 reduced the pace of ILI work by eliminating 28 traditional ILI assessments on  
16 pipe not yet ILI enabled and deferring 23 ILI projects with compliance due dates  
17 in 2027.<sup>10</sup> This represents a decrease of required ILI system capability from  
18 69 percent by the end of 2036 to 65 percent by the end of 2038.

19 **Monthly Data:** See Attachment A at the end of this report.

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<sup>9</sup> See 2023 GRC Exhibit (PG&E-3), p. 5-28.

<sup>10</sup> See D.23-11-069, p. 90 to 92.



1 **Metric 7: Gas In-Line Upgrade**

2 **Metric Name and Description:** Gas In-Line Upgrade – Miles of gas  
3 transmission lines upgraded annually to permit inline inspections.

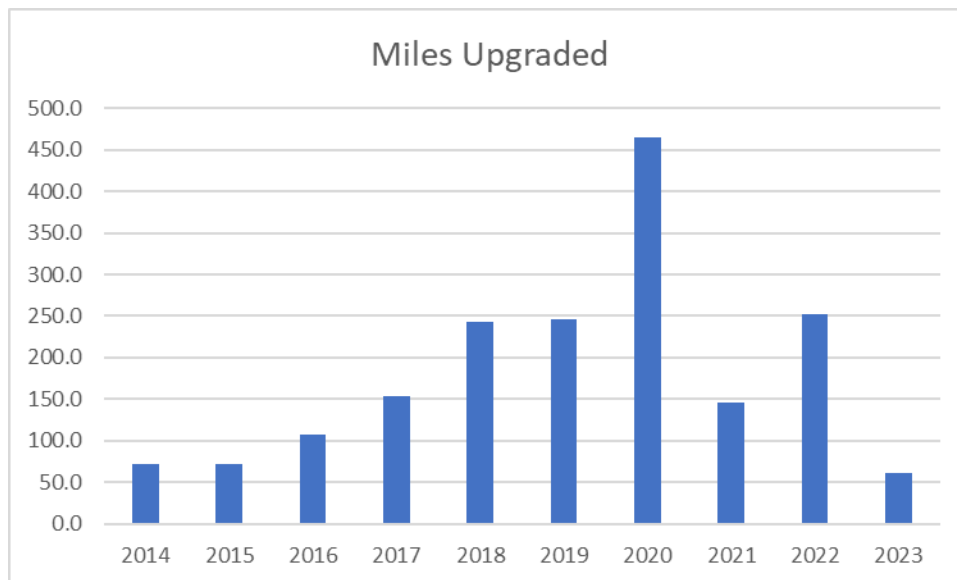
4 **Risks:** Loss of Containment (LoC) on Gas Transmission Pipeline<sup>11</sup>

5 **Category:** Gas

6 **Units:** Miles

7 **Summary:**

**FIGURE 5-7  
MILES OF PIPELINE UPGRADED (ANNUAL)**



8 **Narrative Context:** This metric measures the number of miles of complete  
9 planned Traditional In-Line Inspection (ILI) Upgrade projects, including activities  
10 that exceed current code requirements. Prior to running a Traditional ILI tool in  
11 a pipeline, a pipeline must be modified with portals called “launchers” and  
12 “receivers,” and pipeline features that would obstruct the passage of the tool to  
13 make the pipeline piggable must be replaced.

14 D.11-06-017, as codified by Pub. Util. Section 958, requires natural gas  
15 transmission pipelines in California be capable of ILIs, where warranted. ILI is  
16 the most reliable pipeline integrity assessment tool currently available to natural

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<sup>11</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LoC) on Gas Transmission Pipeline.

1 gas pipeline operators to assess the internal and external condition of  
2 transmission line pipe. The number of miles upgraded each year is based on  
3 several factors such as: individual ILI run lengths, risk identified on each ILI run,  
4 compliance due dates from identified threat(s), balancing of system hydraulics  
5 and resources. There are three major phases to an ILI Program. This metric is  
6 to track progress on the first phase, which involves modifying or upgrading the  
7 existing pipeline system to accommodate a traditional ILI tool. PG&E refers to  
8 this as “Traditional ILI Upgrades,” which involve capital improvements to make  
9 the pipelines piggable. It includes installing pig launchers and receivers in  
10 appropriate locations to introduce and remove the cleaning and ILI tools from the  
11 inside of the pipeline. It also includes replacing certain segments of pipe,  
12 valves, fittings, or other appurtenances that, if left in the system, would obstruct  
13 the movement of the tool through the pipeline.<sup>12</sup>

14 While the metric for this program is “miles upgraded,” the miles targeted for  
15 a given year may vary greatly. The amount of work associated with Traditional  
16 ILI Upgrades is based on projects and is not directly related to miles. This is the  
17 reason that PG&E’s 2023 General Rate Case forecast for the Traditional ILI  
18 Upgrade Program was based on a cost per project basis and did not use the  
19 length of projects as a forecasting basis.

20 To continuously focus on improving performance, metric results are reported  
21 monthly and reviewed at leadership meetings and weekly huddles to discuss  
22 results and act as needed.

23 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
24 **or Higher) Compensation Levels and/or Incentives?**

25 No, in 2023, Gas In-line Upgrade was not used as a STIP metric.

26 **Is Metric Linked to the Determination of Individual or Group Performance**  
27 **Goals?**

28 Yes, Gas In-Line Upgrade is linked to 2023 individual or group performance  
29 goals for one or more Director-level, or higher, position.

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<sup>12</sup> For instance, it involves replacing reduced port valves and other obstructions, such as drip tubes, miter bends, short-radius elbows, and unbarred tees from the pipeline.

1 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

2 Yes, in 2023, the following position(s) include individual performance goals  
3 that are linked to Gas In-Line Upgrade:

- 4 • **Director:** Gas Engineering (1)

5 **Bias Controls:** Monitoring controls exist for this metric. Metric results are  
6 reported monthly by the GO Business Process Governance team and reviewed  
7 at leadership meetings and huddles to discuss performance and take action. In  
8 the event that there is a resulting need for budget changes, approval must be  
9 obtained from the Gas Operations and Engineering Leadership team at the  
10 Enterprise-driven Project Delivery Center Change Control Forum (PDC-CCF).

11 **Rate Case Safety Goal Progress:** This metric supports PG&E’s safety goal  
12 described in the 2023 GRC to upgrade the system to be capable of ILI for  
13 4,553 transmission pipeline miles by the end of 2036, which is approximately  
14 69 percent of PG&E’s Gas Transmission pipeline miles.<sup>13</sup> However, it should  
15 be noted the 2023 GRC Decision (D.23-11-069) reduced the number of ILI  
16 Upgrade projects per year from PG&E’s forecasted 12 to 4.<sup>14</sup> As a result, the  
17 goal has since been adjusted to make approximately 65 percent of the system  
18 capable of ILI by the end of 2038.

19 **Monthly Data:** See Attachment A at the end of this report.

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<sup>13</sup> See 2023 GRC Exhibit (PG&E-3), p. 5-27.

<sup>14</sup> See D.23-11-069, p. 88.

1 **Metric 8: Gas Shut-In Time – Mains**

2 **Metric Name and Description:** Gas Shut-In Time – Mains – Median time to  
3 shut-in gas when an uncontrolled or unplanned gas release occurs on a main.  
4 The data used to determine the median time shall be provided in increments as  
5 defined in General Order 112-F 123.2 (c) as supplemental information, not as a  
6 metric.

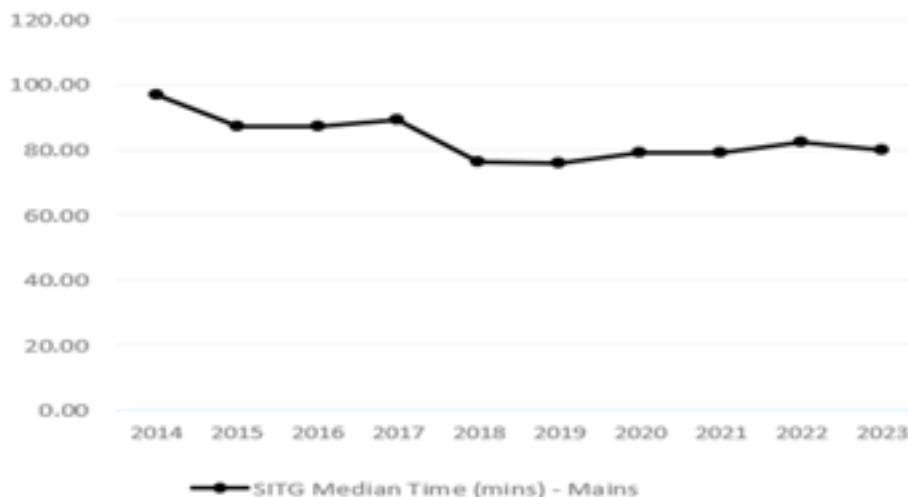
7 **Risks:** Loss of Containment (LoC) on Gas Distribution Main or Service<sup>15</sup>

8 **Category:** Gas

9 **Units:** Time in minutes required to stop the flow of gas for Distribution Mains

10 **Summary:**

**FIGURE 5-8  
SITG MEDIAN TIME – MAINS METRIC DATA (ANNUAL)**



11 **Narrative Context:** This metric measures the median time required for a  
12 qualified PG&E responder to arrive onsite and stop the flow of gas as result of  
13 damages impacting gas mains from PG&E’s distribution network.

14 In 2014, PG&E began to measure the time required for resources to  
15 respond to and make safe instances of blowing gas on distribution mains.  
16 Specifically measured are distribution events relating to dig-ins, vehicle impacts,  
17 explosions, and material failures. In 2014, considering from a median

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<sup>15</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LOC) on Gas Distribution Main or Service.

1 standpoint, it required PG&E 97 minutes to respond to and make safe events  
2 involving distribution mains. In 2023, this response time by PG&E has  
3 substantially improved to 80.0 minutes leading to a reduction by almost  
4 18 percent compared to 2014 and almost 3 percent compared to 2022

5 Metric results have improved and have been achieved through the following  
6 process improvements implemented in the past ten years:

- 7 • Enhanced plastic squeeze capability from approximately 50 percent to all  
8 Gas Service Representatives (GSR) < 1.5” plastic pipe;
- 9 • Provide yearly plastic squeeze training for all Field Service employees;
- 10 • Purchased and implemented emergency trailers in every division, allowing  
11 for emergency equipment to be accessed quickly and easily;
- 12 • Purchased additional steel squeezers for 2-8” steel pipe (housed on  
13 emergency trailers);
- 14 • Implemented Emergency Management tool (EM tool) to alert maintenance  
15 and construction (M&C) of SITG events when notified by third-party  
16 emergency organizations;
- 17 • Established concurrent response protocol (dispatch M&C and Field Service  
18 resources) when notified by emergency agencies;
- 19 • Implemented 30-60-90-120+ minute communication protocols between Gas  
20 Distribution Control Center (GDCC) and Incident Commander (IC) to ensure  
21 consistent communication and issue escalation during events; and
- 22 • Tier 3 incident review meetings weekly to share best practices and review  
23 long duration events.

24 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
25 **or Higher) Compensation Levels and/or Incentives?**

26 No, in 2023, Gas Shut-In Time – Main was not used as a STIP metric.

27 **Is Metric Linked to the Determination of Individual or Group Performance**  
28 **Goals?**

29 Yes, Gas Shut-In Time – Mains is linked to 2023 individual or group  
30 performance goals for one or more Director-level, or higher, position.

31 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

32 Yes, in 2023, the following position(s) include individual performance goals  
33 that are linked to Gas Shut-In Time – Main.

1 • **Senior Vice President:** Gas Operations (1)

2 **Bias Controls:** Dispatch incidents are logged and tracked in the EM tool  
3 database. The most current system (administered through Dynamic 365, which  
4 was implemented in 2018) automatically generates a change log for every  
5 notification at the field level to ensure system controls and retention of record  
6 history. The data is reviewed by the Gas Operations Business Process  
7 Governance to ensure accuracy.

8 The metric definition for this metric including targets, target setting  
9 methodology, and exclusions, are documented and approved by Gas Operations  
10 Leadership. Metric results are reported monthly by the Reporting and Analytics  
11 and Metrics team and reviewed at leadership meetings to discuss performance  
12 and take action. IA performed a validation of the 2023 metric performance. In  
13 the event that there is a resulting need for budget changes, approval must be  
14 obtained from the Gas Operations and Engineering Leadership team at the  
15 Enterprise-driven Project Delivery Center Change Control Forum (PDC-CCF).

16 **Rate Case Safety Goal Progress:** While this metric is not specifically stated in  
17 the 2023 GRC, it is tracked and reported in PG&E's Safety and Operational  
18 Metrics Report.

19 **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 9: Gas Shut-In Time – Services**

2 **Metric Name and Description:** Gas Shut-In Time – Services Median time to  
3 shut-in gas when an uncontrolled or unplanned gas release occurs on a service.  
4 The data used to determine the median time shall be provided in increments as  
5 defined in GO 112-F 123.2 (c) as supplemental information, not as a metric.

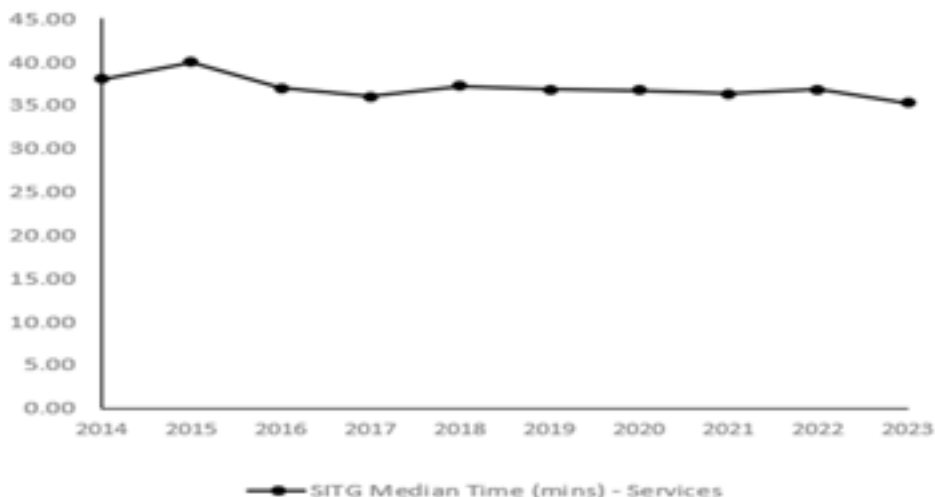
6 **Risks:** Loss of Containment (LoC) on Gas Distribution Main or Service<sup>16</sup>

7 **Category:** Gas

8 **Units:** Time in minutes required to stop the flow of gas for Distribution Services

9 **Summary:**

**FIGURE 5-9  
SITG MEDIAN TIME- SERVICES METRIC DATA (ANNUAL)**



10 **Narrative Context:** PG&E has measured the median time required to respond  
11 to and make safe instances of blowing gas on distribution services since 2014.  
12 Specifically measured are distribution events relating to dig-ins, vehicle impacts,  
13 explosions, material failures and pipeline leaks. In 2014, considering from a  
14 median standpoint, it required PG&E 38 minutes to respond to and make safe  
15 events involving distribution services. In 2023, the median response time was  
16 35.3 minutes, a reduction of 7 percent compared to 2014 and 4 percent  
17 compared to 2022. Metric results have improved and have been achieved

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<sup>16</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LOC) on Gas Distribution Main or Service

1 through the following process improvements implemented during the past  
2 eight years:

- 3 • Enhanced plastic squeeze capability from ~50 percent to all GSRs < 1.5”  
4 plastic pipe;
- 5 • Provide yearly plastic squeeze training for all Field Service employees;
- 6 • Purchased and implemented emergency trailers in every division, allowing  
7 for emergency equipment to be accessed quickly and easily;
- 8 • Purchased additional steel squeezers for 2-8” steel pipe (housed on  
9 emergency trailers);
- 10 • Implemented Emergency Management tool (EM) tool to alert M&C of SITG  
11 events when notified by third-party emergency organizations;
- 12 • Established concurrent response protocol (dispatch M&C and Field Service  
13 resources) when notified by emergency agencies;
- 14 • Implemented 30-60-90-120+ minute communication protocols between  
15 GDCC and IC to ensure consistent communication and issue escalation  
16 during events; and
- 17 • Tier 3 incident review meetings weekly to share best practices and review  
18 long duration events.

19 **Is Metric Used for the Purposes of Determining Executive (Director Level  
20 or Higher) Compensation Levels and/or Incentives?**

21 No, in 2023, Gas Shut-In Time – Services was not used as a STIP metric.

22 **Is Metric Linked to the Determination of Individual or Group Performance  
23 Goals?**

24 Yes, Gas Shut-In Time – Services is linked to 2023 individual or group  
25 performance goals for one or more Director-level, or higher, position.

26 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

27 Yes, in 2023, the following position(s) include individual performance goals  
28 that are linked to Gas Shut-In Time – Services :

- 29 • **Senior Vice President:** Gas Operations (1)

30 **Bias Controls:** Dispatch incidents are logged and tracked in the EM tool  
31 database. The most current system (administered through Dynamic 365 which  
32 was implemented in 2018) automatically generates a change log for every



1 notification down to the field by field basis to ensure system controls and  
2 retention of record history. The data is reviewed by the process team to ensure  
3 accuracy.

4 Monitoring controls also exist for this metric. The metric definition for this  
5 metric including targets, target setting methodology, and exclusions, are  
6 documented and approved by Gas Operations Leadership. Metric results are  
7 reported monthly by the Reporting and Analytics and reviewed at leadership  
8 meetings and huddles to discuss performance and take action. In the event  
9 that there is a resulting need for budget changes, approval must be obtained  
10 from the Gas Operations and Engineering Leadership team at the  
11 Enterprise-driven Project Delivery Center Change Control Forum (PDC-CCF).

12 IA performed a validation of the 2023 metric performance.

13 **Rate Case Safety Goal Progress:** While this metric is not specifically  
14 stated in the 2023 GRC, it is tracked and reported in PG&E's Safety and  
15 Operational Metrics Report.

16 **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 10: Cross Bore Intrusions**

2 **Metric Name and Description:** Cross Bore Intrusions – Cross bore intrusions  
3 found per 1,000 inspections, reported on an annual basis.

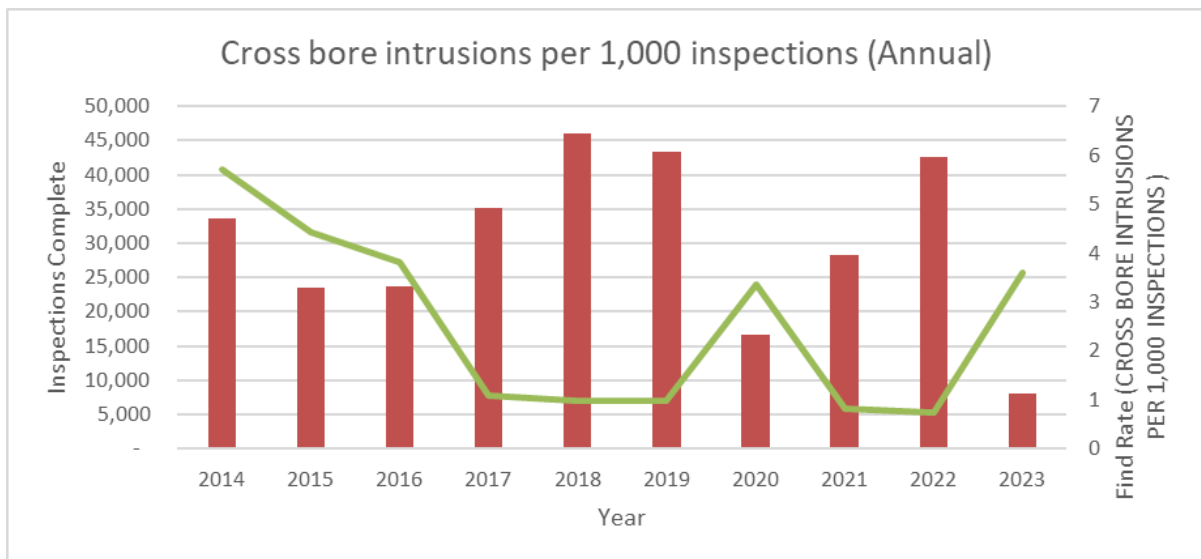
4 **Risks:** Loss of Containment (LoC) on Gas Distribution Main or Service<sup>17</sup>

5 **Category:** Gas

6 **Units:** Number of cross bore intrusions

7 **Summary:**

**FIGURE 5-10**  
**CROSS BORE INTRUSIONS PER 1,000 INSPECTIONS (ANNUAL)**



8 **Narrative Context:** The Cross Bore Intrusion metric measures the number of  
9 cross bores found per 1,000 inspections. A cross bore refers to a gas main or  
10 service that has been installed unintentionally, using trenchless technology,  
11 through a wastewater or storm drain system. Inspections refer to inspection of  
12 potential conflict locations and repair occurrences of cross bore discoveries in  
13 any location within PG&E territory. Cross bores pose a risk as they can result in  
14 a gas leak into the sewer system if damaged during mechanical sewer cleaning  
15 operations which may result in loss of containment and potential migration and

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<sup>17</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LOC) on Gas Distribution Main or Service.

1 ignition of gas. The risk is mitigated by repairing the cross bore after finding it by  
2 inspection.

3 Since 2013, there has been a declining trend in find rate. There was an  
4 uptick in the find rate and a decrease in the number of inspections completed in  
5 2023 compared to prior years due to a focus on completing work in the City of  
6 San Francisco. This area has been identified as the highest risk of potential  
7 legacy cross bores, however, is also one of the most difficult geographic  
8 locations to perform inspections, which resulted in slower production.

9 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
10 **or Higher) Compensation Levels and/or Incentives?**

11 No, in 2023, Cross Bore Intrusions was not used as a STIP metric.

12 **Is Metric Linked to the Determination of Individual or Group Performance**  
13 **Goals?**

14 Yes, Cross Bore Intrusions is linked to 2023 individual or group performance  
15 goals for one or more Director-level, or higher, position.

16 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

17 Yes, in 2023, the following position(s) include individual performance goals  
18 that are linked to Cross Bore Intrusions:

- 19 • **Director:** Gas Operations (1).

20 **Bias Controls:** Cross bore inspection counts are logged and tracked within  
21 SAP as work is completed based on clerical updates from the field. A validation  
22 is conducted by the Distribution Operations team to ensure units and work type  
23 are correctly coded (inspection vs. repair) within the database. Cross bores  
24 found are logged by the field and tracked by the Cross Bore Program  
25 management team. When a potential cross bore intrusion is located, field  
26 personnel will contact the Cross Bore Program management team and will also  
27 call PGE-5000. This triggers a response for a Gas Service Representative and  
28 Locate and Mark operator to help validate the intrusion.

- 1 **Rate Case Safety Goal Progress:** This safety metric does not support a stated
- 2 safety goal in the 2023 GRC.<sup>18</sup>
- 3 **Monthly Data:** See Attachment A at the end of this report.

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<sup>18</sup> See 2023 GRC Exhibit (PG&E-3), p. 4-25.

1       **Metric 11: Gas Emergency Response Time**

2               **Metric Name and Description:** Gas Emergency Response Time – The  
3 average and median time in minutes a gas service representative (GSR)  
4 (or qualified first responder) takes to respond to a gas-related emergency  
5 notification, from the time of notification to the time of onsite arrival. Emergency  
6 notifications include all notifications originating from 911 calls and calls made  
7 directly to the utility’s safety hotlines. The data used to determine the average  
8 and median time shall be provided in increments as defined in General Order  
9 112-F 123.2 (c) as supplemental information, not as a metric. This information is  
10 identical to that of which is included in our Gas Emergency Response Business  
11 Process Review (BPR) and is excel data.

12       **Risks:** Loss of Containment (LoC) on Gas Distribution Main or Service<sup>19</sup>

13       **Category:** Gas

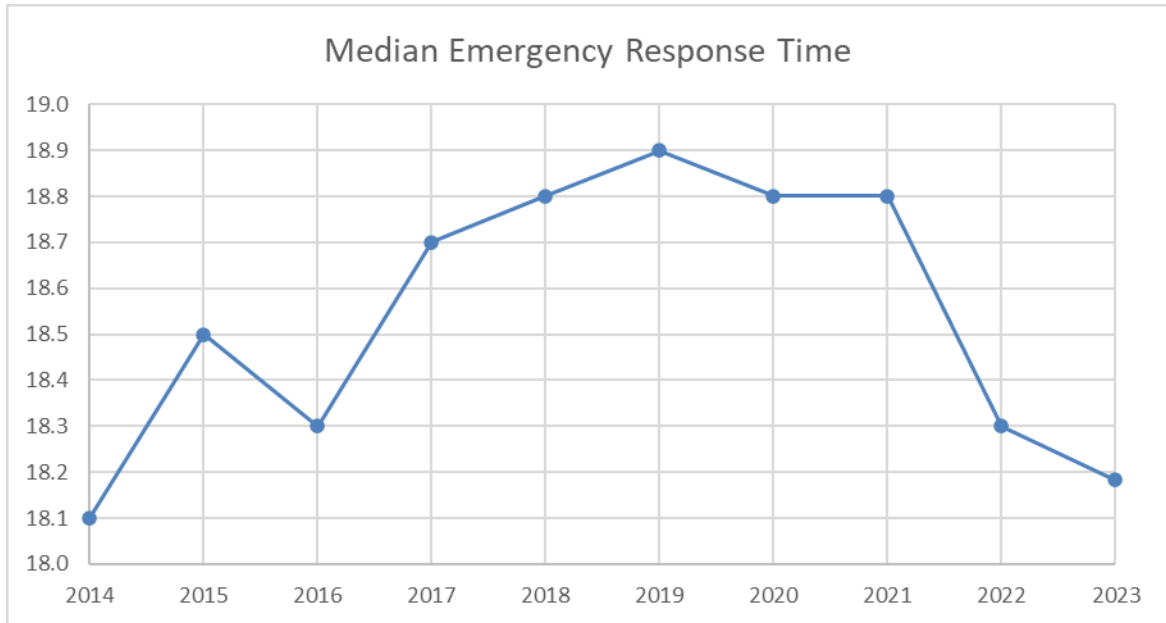
14       **Units:** The time in minutes that a GSR (or a qualified first responder) takes to  
15 respond after receiving a call which results in an emergency order.

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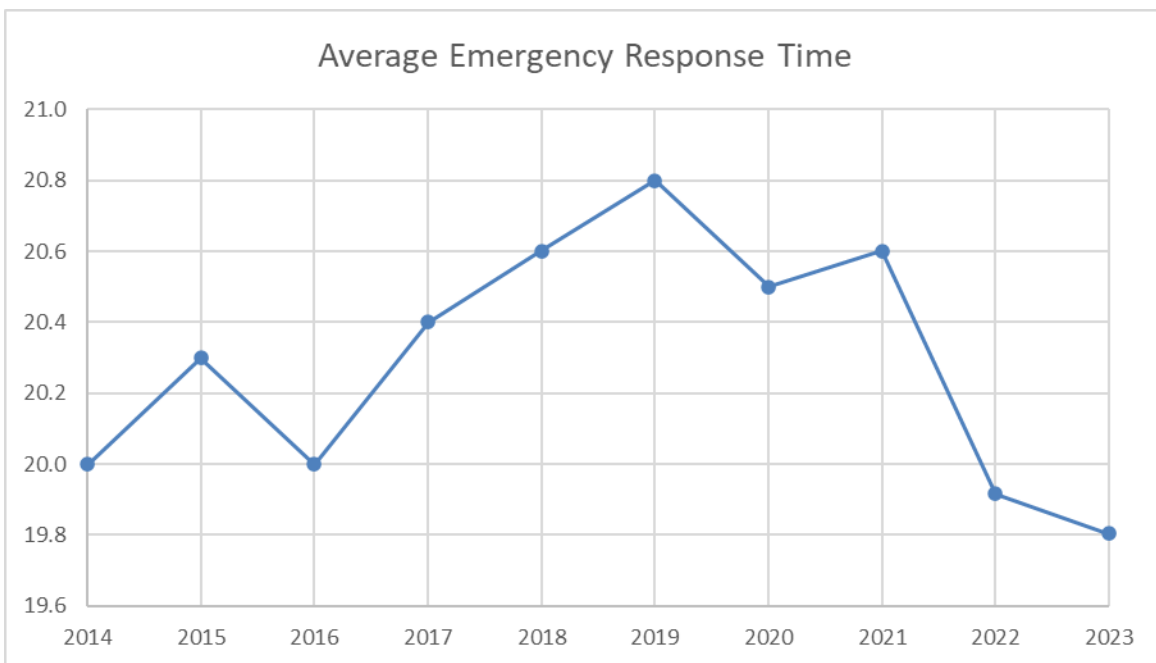
<sup>19</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LOC) on Gas Distribution Main or Service.

**Summary:**

**FIGURE 5-11A  
MEDIAN EMERGENCY RESPONSE TIME (ANNUAL)**



**FIGURE 5-11B  
AVERAGE EMERGENCY RESPONSE TIME (ANNUAL)**



1 **Narrative Context:** The average response time is measured from the time  
2 PG&E is notified of the gas emergency order/immediate response (IR) until a  
3 GSR or a qualified first responder arrives onsite to the emergency location  
4 (including Business Hours and After Hours). PG&E has maintained steady  
5 performance for the last several years. From 2014-2023, there has been a  
6 6 percent decrease in the average response time. From 2014-2023, the median  
7 time to respond to respond on-site to a gas emergency notification improved by  
8 5 percent. To continuously focus on improving performance, metric results are  
9 reported weekly and monthly and reviewed at leadership meetings and weekly  
10 huddles to discuss results and act as needed. We also share preliminary daily  
11 results for Daily Operating Reviews.

12 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
13 **or Higher) Compensation Levels and/or Incentives?**

14 Yes, Gas Emergency Response Time was used as a STIP metric for 2023.

15 **Is Metric Linked to the Determination of Individual or Group Performance**  
16 **Goals?**

17 Yes, Gas Emergency Response Time is linked to 2023 performance goals  
18 for one or more Director-level, or higher, position.

19 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

20 Yes, Gas Emergency Response Time linked to all individual goals as part of  
21 2023 STIP plan. In addition, this metric may be included as part of an  
22 individual's performance goals.

23 **Bias Controls:** All response times to emergency calls are reviewed by the  
24 Immediate Response (IR) team to determine appropriate adjustments and  
25 exclusions, and the average response time is calculated. Response times are  
26 captured electronically using PG&E's Field Automation System and are verified  
27 on a sample basis.

28 Monitoring controls also exist for this metric. The metric definition for this  
29 metric including targets, target setting methodology, and exclusions, are  
30 documented and approved by Gas Operations Leadership. Metric results are  
31 reported monthly in the Centralized Metrics Repository (CMR), facilitated by the  
32 Operations Support, Reporting and Analytics team, and performance is reviewed

1 monthly at Operating Reviews. Any required leadership support is requested in  
2 these Reviews.

3 IA performed a validation of the 2023 metric performance and periodically  
4 validated the controls in 2023 in place for gathering metric data and the Utility's  
5 performance in meeting the metric.

6 **Rate Case Safety Goal Progress:** This safety metric supports a safety goal  
7 described in the 2023 GRC have a GSR on-site as quickly as possible for  
8 customer generated gas odor calls. Consistent with current practice, PG&E will  
9 continue to treat all customer-reported gas odor calls as IR and will attempt to  
10 respond to such calls within 60 minutes.<sup>20</sup>

11 **Monthly Data:** See Attachment A at the end of this report.

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<sup>20</sup> See 2023 GRC Exhibit (PG&E-3), p. 8-27 to 8-28.



1 **Metric 12: Natural Gas Storage Baseline Assessments Performed**

2 **Metric Name and Description:** Natural Gas Storage Baseline Assessments  
3 Performed – Tracks the progress of completing baseline and reassessment  
4 inspections that were expected to be completed within a given year. It reports  
5 the number of storage well baseline assessments completed as a percentage of  
6 the number scheduled to be completed in the period. The number scheduled  
7 will depend on any regulatory required inspections as well as any initiated by the  
8 utility.

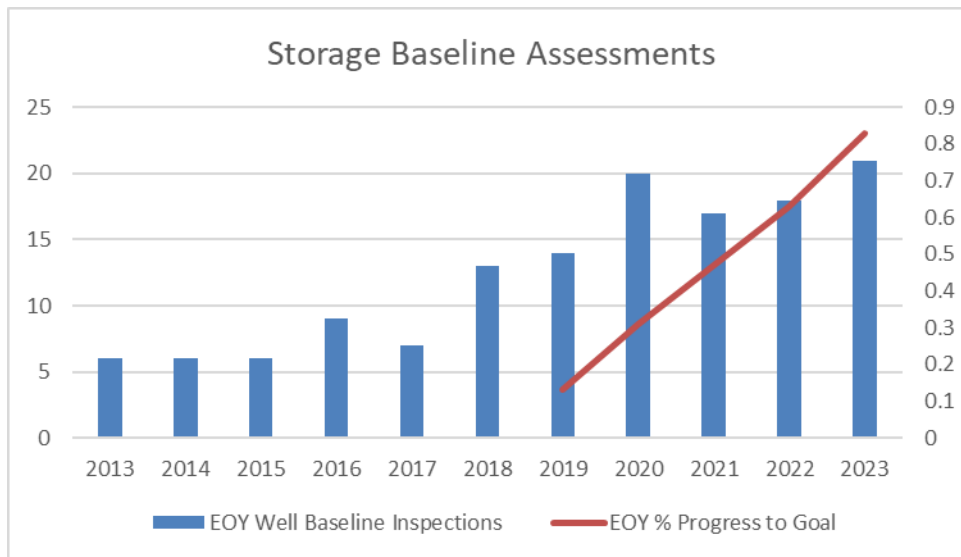
9 **Risks:** Loss of Containment (LoC) at Natural Gas Storage Well or Reservoir  
10 (NGSWR)<sup>21</sup>

11 **Category:** Gas

12 **Units:** Number of Assessments completed/Number scheduled or targeted

13 **Summary:**

**FIGURE 5-12  
STORAGE BASELINE WELL ASSESSMENTS (ANNUAL)**



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<sup>21</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LoC) at Natural Gas Storage Well or Reservoir (NGSWR).

1 **Narrative Context:** The Natural Gas Storage Baseline Inspections metric  
2 measures the number of baseline well assessments performed since 2013.  
3 PG&E planned to complete baseline well production casing assessments on  
4 109 wells by 2024 per objectives defined in PG&E's Gas Storage Asset  
5 Management Plan and also adjusted to incorporate an accelerated pace  
6 required by regulation changes in the storage industry at both federal and state  
7 levels.

8 In 2023, all wells have been baselined with the original tool. PG&E  
9 completed 21 well inspections in 2023 and is on track to complete 100 percent  
10 of baseline inspections by 2024.

11 However, wells that were inspected prior to 2019 must be re-baselined using  
12 additional well inspection baselining tools that are now required under the new  
13 regulations, effective October 2018. The plan approved by the California  
14 Geologic Energy Management Division (CalGEM) requires baseline casing  
15 inspections under the full inspection tool suite by 2024. PG&E is on track to  
16 complete the remaining well re-baseline inspections and conversions to dual  
17 barrier construction in 2024 in alignment with the CalGEM June 1, 2021 plan.  
18 PG&E is currently seeking approval from CalGEM for a risk-based reinspection  
19 interval.

20 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
21 **or Higher) Compensation Levels and/or Incentives?**

22 No, in 2023, Natural Gas Storage Baseline Inspections Performed was not  
23 used as a STIP metric.

24 **Is Metric Linked to the Determination of Individual or Group Performance**  
25 **Goals?**

26 No, Natural Gas Storage Baseline Inspections Performed is not linked to  
27 2023 individual or group performance goals for one or more Director-level, or  
28 higher, position.

1 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

2 No, in 2023, Natural Gas Storage Baseline Inspections Performed is not  
3 linked to 2023 individual performance goals for Director-level, or higher,  
4 positions.

5 **Bias Controls:** Data Integrity – Project completion (assessment complete) is  
6 tracked in the P6 scheduling tool and database and the Reservoir Engineering  
7 team is responsible for validating that the assessment is a first-time inspection  
8 and not a reinspection of the same well. CalGEM is also responsible for  
9 validating work completion as well inspection log survey results must be  
10 submitted as part of regulation.

11 **Rate Case Safety Goal Progress:** This safety metric supports a safety goal  
12 described in the 2023 GRC to complete baseline inspections on wells at the  
13 McDonald Island and Los Medanos underground storage facilities by 2023.<sup>22</sup>  
14 In addition, PG&E is on track to complete well conversions at McDonald Island  
15 and Los Medanos to dual barrier by 2024.

16 **Monthly Data:** See Attachment A at the end of this report.

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<sup>22</sup> See 2023 GRC Exhibit (PG&E-3), pp. 7-17 to 7-18.

1 **Metric 13: Gas Pipelines That Can Be Internally Inspected**

2 **Metric Name and Description:** Gas Pipelines That Can Be  
3 Internally-Inspected – Total miles and percent of system that can be internally  
4 inspected (“pigged”) relative to all transmission pipelines in the system.

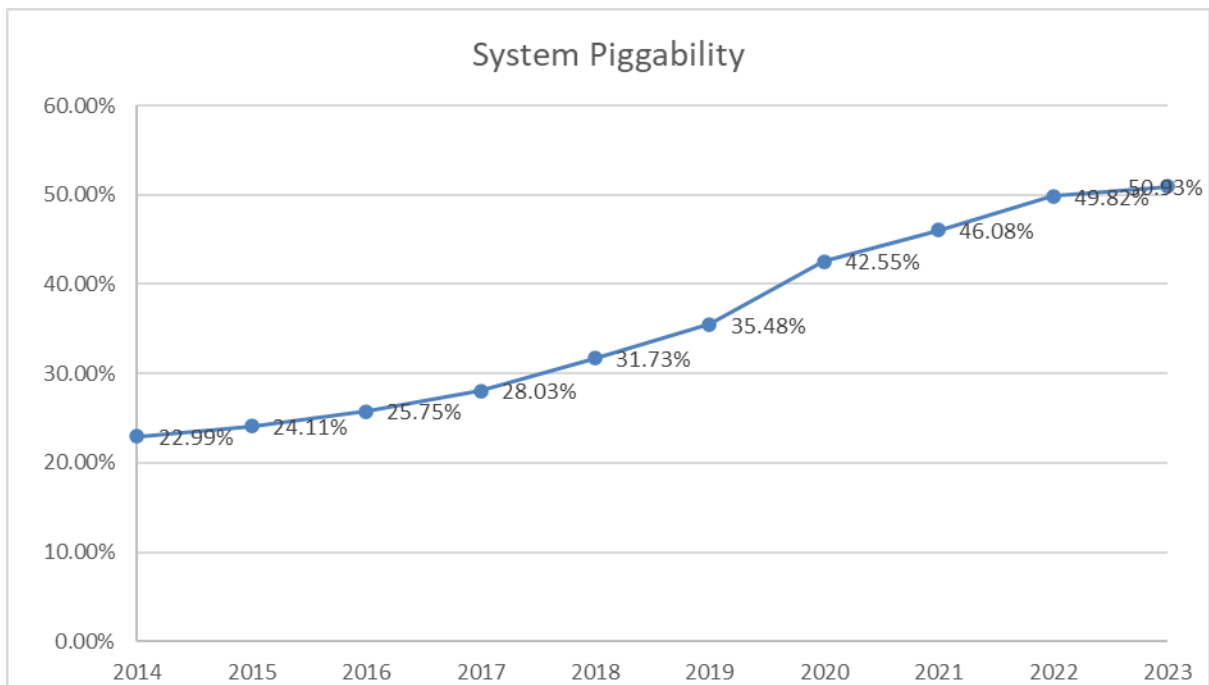
5 **Risks:**

6 **Category:** Gas

7 **Units:** Miles and percentage

8 **Summary:** Loss of Containment (LoC) on Gas Transmission Pipeline<sup>23</sup>

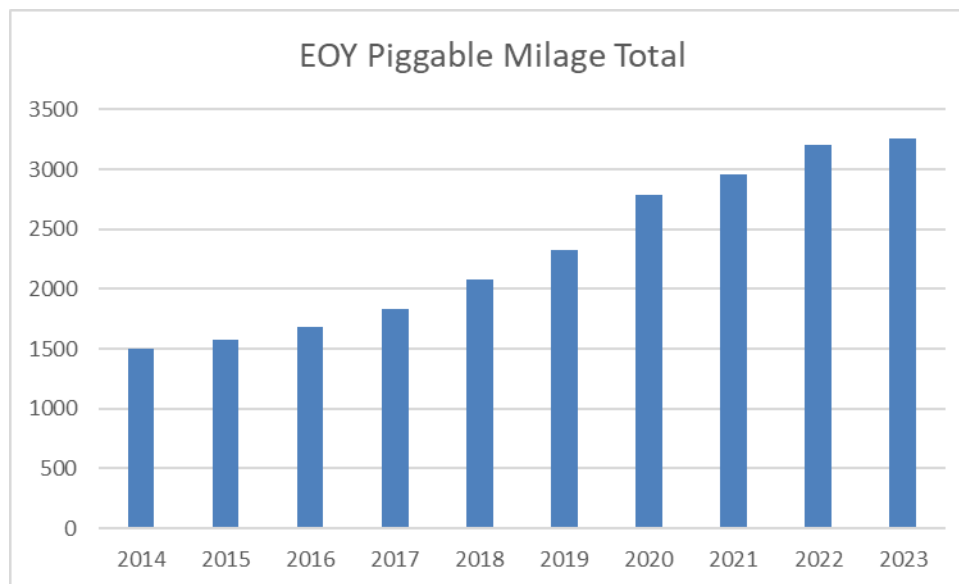
**FIGURE 5-13A  
GAS PIPELINES THAT CAN BE INTERNALLY-INSPECTED (ANNUAL)**



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<sup>23</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LoC) on Gas Transmission Pipeline.

**FIGURE 5-13B  
GAS PIPELINES THAT CAN BE INTERNALLY-INSPECTED (ANNUAL)**



1 **Narrative Context:** In-Line Inspection (ILI) is the most reliable pipeline integrity  
2 assessment tool currently available to natural gas pipeline operators to assess  
3 the internal and external condition of transmission line pipe. In 2023, PG&E  
4 upgraded 60.75 miles, for a total of 3247.8 system piggable miles.

5 **Is Metric Used for the Purposes of Determining Executive (Director Level  
6 or Higher) Compensation Levels and/or Incentives?**

7 No, in 2023, Gas Pipelines That Can Be Internally Inspected was not used  
8 as a STIP metric.

9 **Is Metric Linked to the Determination of Individual or Group Performance  
10 Goals?**

11 No, Gas Pipelines That Can Be Internally Inspected is not linked to 2023  
12 individual or group performance goals for one or more Director-level, or higher,  
13 positions.

14 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

15 No, Gas Pipelines That Can Be Internally Inspected is not linked to 2023  
16 individual performance goals for Director-level, or higher, positions.

1       **Bias Controls:** Monitoring controls exist for this metric. Metric results are  
2 reported monthly in the Centralized Metrics Repository (CMR), facilitated by the  
3 Operations Support, Reporting and Analytics team, and performance is reviewed  
4 monthly at Operating Reviews. Any required leadership support is requested in  
5 these Reviews.

6       **Rate Case Safety Goal Progress:** This metric supports PG&E’s safety goal  
7 described in the 2023 GRC to upgrade the system to be capable of ILI for 4,553  
8 transmission pipeline miles by the end of 2036, which is approximately  
9 69 percent of PG&E’s Gas Transmission pipeline miles.<sup>24</sup> However, it should  
10 be noted the 2023 GRC Decision (D.23-11-069) reduced the number of ILI  
11 Upgrade projects per year from PG&E’s forecasted 12 to four (4).<sup>25</sup> As a result,  
12 the goal may have to be adjusted beyond 2036.

13       **Monthly Data:** See Attachment A at the end of this report.

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<sup>24</sup> See 2023 GRC Exhibit (PG&E-3), p. 5-27.

<sup>25</sup> See D.23-11-069, p. 88.

1 **Metric 14: Employee DART Rate**

2 **Metric Name and Description:** Employee DART Rate – DART Rate is  
3 calculated based on number of OSHA recordable injuries resulting in Days Away  
4 from work and/or Days on Restricted Duty or Job Transfer, and hours worked.

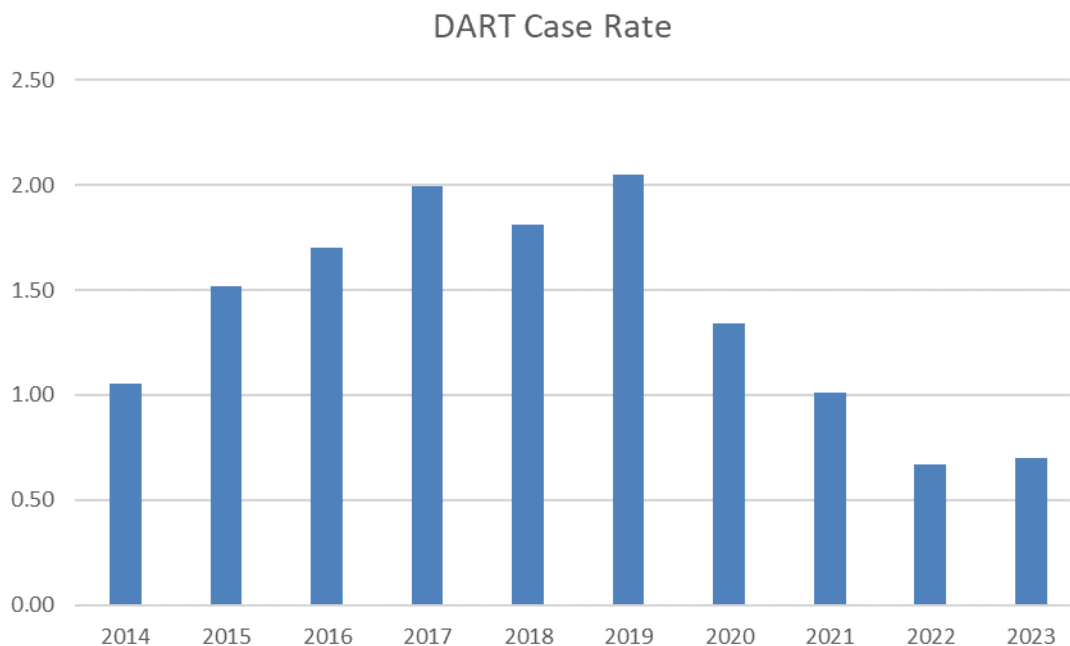
5 **Risks:** Employee Safety Incident<sup>26</sup>

6 **Category:** Injuries

7 **Units:** DART Cases times 200,000 divided by employee hours worked

8 **Summary:**

**FIGURE 5-14  
EMPLOYEE DART CASE RATE METRIC DATA (ANNUAL)**



9 **Narrative Context:** PG&E began tracking the employee DART Case Rate in  
10 2011. This metric showed a rate increase from 2014 until 2019 driven primarily  
11 by restricted duty cases related to sprains and strains. Since 2019, there has  
12 been a 66 percent decrease in the DART rate.

13 Efforts supporting a reduction include the expansion of PG&E's ergonomic  
14 programs and increased Industrial Athlete Specialists for job site evaluations.  
15 A primary goal of the efforts is reduced injury severity through injury prevention

---

<sup>26</sup> The Corporate Risk Register includes the following risk: Employee Safety Incident.

1 and early intervention care for employees. In alignment with this, we have  
2 strengthened the identification of the highest risk work groups and tasks for field  
3 and vehicle ergonomic injuries. We identify high risk computer users through  
4 predictive modeling and provide targeted interventions. Additional efforts also  
5 include enhanced injury management containment for injuries at risk for  
6 escalation to DART and providing our people leaders with additional injury  
7 management training.

8 As follow-up to the response to SPD's expectation about DART case  
9 correlation with SIF incidents, PG&E is continuing to review DART cases and  
10 SIF incidents for a reliable correlation. A slightly higher DART rate and a lower  
11 number of SIF incidents occurred in 2023. Due to the small number of  
12 SIF-Actual incidents this analysis has been challenging. Nevertheless, we are  
13 continuing to explore this trend and have no new finding to share at this time.

14 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
15 **or Higher) Compensation Levels and/or Incentives?**

16 No, in 2023, Employee DART Rate was not used as STIP metric.

17 **Is Metric Linked to the Determination of Individual or Group Performance**  
18 **Goals?**

19 Yes, Employee DART Rate is linked to 2023 individual or group  
20 performance goals for one or more Director-level, or higher, position.

21 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

22 Yes, in 2023, the following position(s) include individual performance goals  
23 that are linked to Employee DART Rate.

- 24 • **Chief:** Enterprise Health and Safety (1), Finance (1), Generation (2),  
25 Human Resources & Enterprise Change Office (1), Operations (1)
- 26 • **Director:** Corporate Affairs (1), Customer & Communications (4), Electric  
27 Engineering (6), Electric Operations (24), Engineering, Planning &  
28 Strategy (3), Enterprise Health and Safety (7), Finance (4), Gas Engineering  
29 (5), Gas Operations (11), Generation (16), Human Resources & Enterprise  
30 Change Office (2), Information Technology (4), Operations (26), Shared  
31 Services (7), Supply Chain (3)



- 1 • **Senior Director:** Customer & Communications (4), Electric Engineering (3),  
2 Electric Operations (10), Enterprise Health & Safety (4), Finance (3), Gas  
3 Engineering (1), Gas Operations (9), General Counsel, Ethics, Risk &  
4 Compliance (1), Generation (3), Information Technology (1), Operations (8),  
5 Shared Services (3)
- 6 • **Vice President:** Customer & Communications (3), Electric Operations (2),  
7 Enterprise Health & Safety (1), Finance (1), Gas Operations (2), Generation  
8 (2), Human Resources & Enterprise Change Office (1), Operations (1),  
9 Shared Services (1), Supply Chain/Materials (1)
- 10 • **Senior Vice President:** Electric Engineering (1), Gas Engineering (1), Gas  
11 Operations (1), Generation (1)

12 **Bias Controls:** OSHA regulates the definition of a DART case and we use  
13 multiple sources to determine if the injury meets the criteria for DART. This  
14 includes feedback from the physician, the employee, and the supervisor.

15 **Rate Case Safety Goal Progress:** The metric is stated in 2023 GRC Safety  
16 and Health chapter (Chapter 1).<sup>27</sup> The year-end target for DART rate in 2023  
17 was 0.64. The year-end target for 2024 is 0.68. As previously mentioned, since  
18 2019 there has been a 66 percent decrease in the employee DART rate. The  
19 annual average number of DART cases was used in the 2020 RAMP model  
20 consequence analysis for the Employee Safety Incident risk.<sup>28</sup> RAMP model  
21 results for the risk reduction programs being implemented indicate a reduction in  
22 employee DART cases through 2026.

23 **Monthly Data:** See Attachment A at the end of this report.

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<sup>27</sup> PG&E 2023 GRC Exhibit (PG&E-7), Chapter 1, Safety and Health , p. 1-24.

<sup>28</sup> PG&E 2020 RAMP Report, Chapter 16, Risk Mitigation Plan: Employee Safety Incident.

1       **Metric 15: Rate of Serious Injuries or Fatalities (SIF) Actual (Employee)**

2       **Metric Name and Description:** Rate of SIF Actual (Employee) is calculated  
3       using the formula: Number of SIF-Actual cases among employees x 200,000/  
4       employee hours worked, where SIF Actual is counted using the methodology  
5       developed by the Edison Electric Institute’s (EEI) Occupational Safety and  
6       Health Committee (OS&HC) Safety and Classification Learning (SCL) Model.

7       If a utility has implemented a replicable substantially similar evaluation  
8       methodology for assessing SIF Actual, the utility may use that method for  
9       reporting this metric. If a utility opts to report the rate of SIF Actual using a  
10      method other than the EEI Safety Classification Model, it must explain how its  
11      methodology for counting SIF Actual differs and why it chose to use it.

12      As a supplemental reporting requirement to the SIF Actual (SIF-A) Rate for  
13      comparative purposes, all utilities shall also provide SIF-A data based on  
14      California Division of Occupational Safety and Health (Cal/OSHA) reporting  
15      requirements under Section 6409.1 of the California Labor Code.

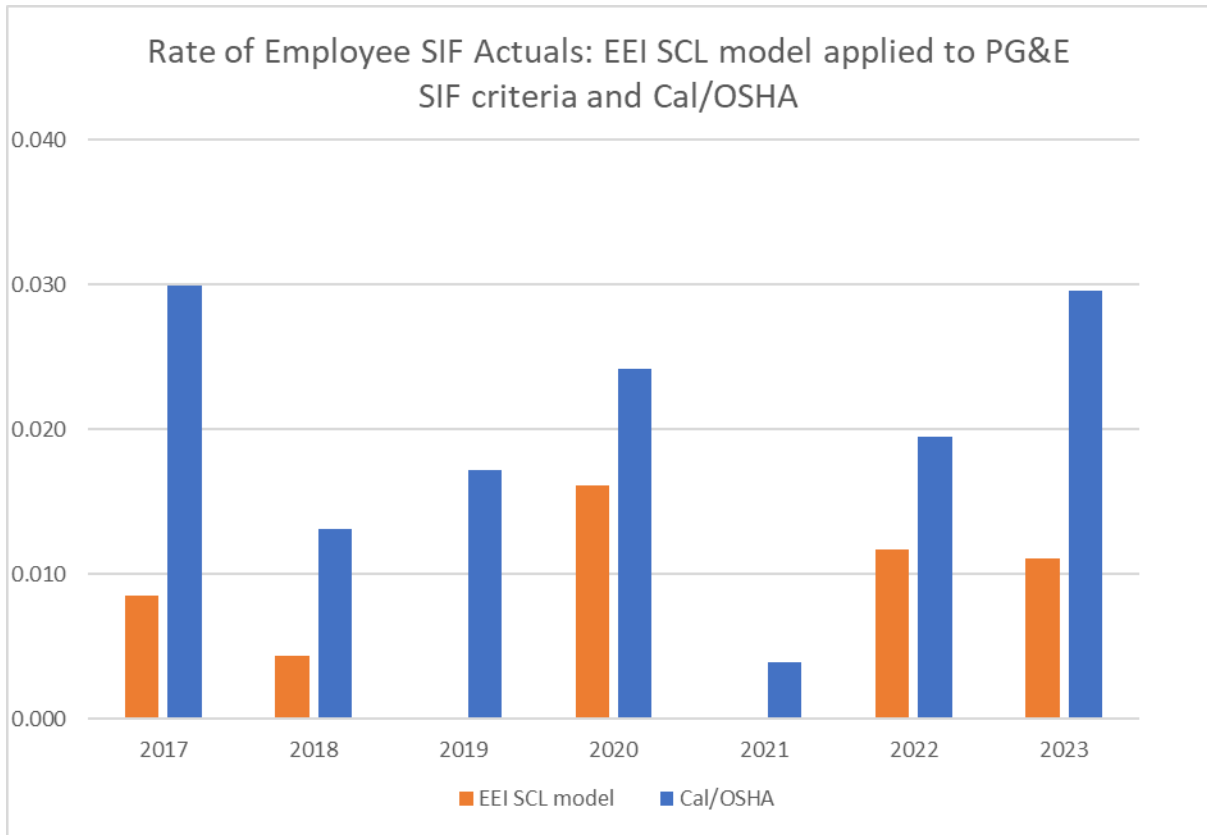
16      **Risks:** Employee Safety Incident

17      **Category:** Injuries

18      **Units:** Rate of SIF-Actual (SIF-A) cases among employees x 200,000/employee  
19      hours worked

1 **Summary:**

**FIGURE 5-15**  
**RATE OF SIF ACTUAL (EMPLOYEE) EEI SCL MODEL AND CAL/OSHA<sup>(a)</sup>**  
**DEFINITIONS COMPARISON**



(a) Per Cal/OSHA, a serious injury or illness is defined as one involving inpatient hospitalization, regardless of length of time, for other than medical observation or diagnostic testing; amputation; loss of an eye; or serious degree of permanent disfigurement.

2 **Narrative Context:** Pacific Gas and Electric Company’s (PG&E or the  
3 Company) SIF Program was deployed at the end of 2016 to establish a  
4 classification and cause evaluation process for coworker and contractor serious  
5 injuries or fatalities.<sup>29</sup> The goal of PG&E’s SIF Program is to reduce the number  
6 and severity of safety incidents that result in a SIF. The program objective is to  
7 learn from safety incidents by performing cause evaluations on each SIF-Actual

<sup>29</sup> Per I.14-08-022, Kern Order Instituting Investigation (Kern OII) (Aug. 28, 2014) Settlement Agreement with California Public Utilities Commission (CPUC) see D.15-07-014.

1 (SIF-A) and SIF Potential (SIF-P) incident, implementing corrective actions, and  
2 sharing key findings across the enterprise.

3 In August of 2020, PG&E adopted Edison Electric International's (EEI)  
4 Safety Classification Learning (SCL) Model to mature classification of its SIF  
5 incidents.<sup>30</sup> Adopting the EEI SCL Model has improved PG&E's SIF Program  
6 by bringing a consistent and objective approach to reviewing and classifying SIF  
7 incidents and identifying high-energy tasks. The EEI SCL model does not  
8 directly define a SIF-A, rather it classifies incidents into categories: High-Energy  
9 SIF (HSIF),<sup>31</sup> Low-Energy SIF (LSIF),<sup>32</sup> Potential SIF (PSIF),<sup>33</sup> Capacity,<sup>34</sup>  
10 Exposure,<sup>35</sup> Success,<sup>36</sup> and Low Severity.<sup>37</sup> The HSIF terminology is fairly  
11 new to the industry; however, it is equivalent to a SIF-A with regard to how  
12 serious life threatening, life-altering or fatalities are determined.<sup>38</sup>  
13 While PG&E uses the EEI SCL model methodology to classify and track SIF-A  
14 incidents, PG&E's SIF Program differs slightly from the EEI model in that PG&E  
15 includes all types of Motor Vehicle Incidents (MVI) in its SIF counts, whereas the  
16 EEI SCL model does not.<sup>39</sup> PG&E believes that all MVIs (even where any injury  
17 did not occur) should be considered for SIF potentiality and will continue to

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**30** See, SCL Model at <https://esafetyline.net/eei/docs/eeiSCLmodel.pdf> at p. 17.

**31** *Id.* at p. 17, HSIF is defined as: "Incident with a release of high energy in the absence of a direct control where a serious injury is sustained."

**32** *Id.* at p. 17, LSIF is defined as: "Incident with a release of low energy in the absence of a direct control where a serious injury is sustained."

**33** *Id.* at p. 17, 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."

**34** *Id.* at p. 17, 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."

**35** *Id.* at p. 17, Exposure is defined as: "Condition where high energy is present in the absence of a direct control."

**36** *Id.* at p. 17, Success is defined as: "Condition where a high energy incident does not occur because of the presence of a direct control."

**37** *Id.* at p. 17, Low Severity is defined as: "Incident with a release of low energy where no serious injury is sustained."

**38** EEI Safety Classification and Learning (SCL) Model, Serious Injury or Fatality defined as Life-threatening or life-altering incident.

**39** This has been discussed during learning sessions with EEI and conversations with the SCL author that some MVIs do not fit within the parameters of the SCL model. PG&E uses its own MVI SIF classification process per SAFE-1002S: Motor Vehicle Standard, which is outside the SCL model classification process.

1 include them in the SIF counts. This may differ slightly from how other utilities  
2 classify and categorize MVIs.

3 This SPM definition includes the use of the EEI OS&HC serious injury  
4 criteria,<sup>40</sup> which defines a serious injury using fourteen specific injury criteria. In  
5 operation, and in discussions with peer utilities and EEI, PG&E finds that the  
6 OS&HC criteria does not align with the life altering/life threatening aspects of the  
7 SIF Program objective and is in contradiction to the SCL model purpose. PG&E  
8 does, however, define serious injury in its SIF Program,<sup>41</sup> which is substantially  
9 similar to the OS&HC criteria. The difference is that PG&E considers life  
10 altering/life threatening a substantial factor in serious injury determination.<sup>42</sup>  
11 As allowed by CPUC SPM definition for a SIF-A (Employee) incident, PG&E  
12 uses substantially similar criteria to classify an injury as serious as compared to  
13 the EEI OS&HC criteria including life threatening/life altering into the SIF-A  
14 determination. This determination can also include a third party medical  
15 consultant to review and concur with a serious injury classifications. This model  
16 allows the Company to focus its safety and risk mitigation efforts on the most  
17 serious outcomes and highest risk work where a high energy incident occurred.

18 There have been thirteen SIF-A Employee incidents between 2017 and  
19 2023, which include five fatalities and eight serious injuries. The events involved  
20 injuries caused by an intentional act of violence by a third-party, electrical  
21 contacts, a pipeline drying (pigging) line-of-fire incident, finger amputation due to  
22 the improper equipment use, and MVIs (including Off-Road Utility Vehicles  
23 (OUV)). Corrective actions have been taken to address the identified causes

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**40** Occupational Safety & Health Committee: Serious Injury & Fatality Criteria (SIF) can be reviewed at:  
<https://images.magnetmail.net/images/clients/EEI //attach/Environment/hsif2022.pdf>.

**41** SAFE-1100S: Serious Injury or Fatality Standard, Appendix A Examples of a Serious Injury.

**42** Per SAFE-1100S: PG&E defines a SIF-A (analogous to a EEI SCL HSIF) as: A work-related high-energy incident consequential from work at or for PG&E that results in any of the following to employees, contractors, or directly supervised contractors:

- A fatality – work-related fatal injury or illness;
- A life-threatening injury or illness that required immediate life-preserving action that if not applied immediately would likely have resulted in the death of that person;
- A life-altering injury or illness that resulted in a permanent and significant loss of a major body part or organ function.

1 and prevent potential future similar outcomes that could lead to a SIF-A event,  
2 including:

- 3 • Eliminated OUVs from use within PG&E, including rental of OUVs;
- 4 • Standing down all barehand electrical work until further notice; and
- 5 • Establishing the Enterprise Safe Access Asset Program Proposal to inspect  
6 and maintain PG&E road access to our assets.

7 The implementation of the PG&E Safety Excellence Management System  
8 (PSEMS) and stronger focus on workforce safety initiatives, such as  
9 development of critical risk standards, enhancing the field safety observations  
10 program, leader engagement, and lean operating model, will continue to reduce  
11 this trend.

12 With regard to Cal/OSHA reporting requirements, there were eight serious  
13 incidents involving PG&E employees in 2023, three of which were classified as  
14 SIF-Actual incidents using PG&E criteria.

Date	SIF Type	Incident	Summary
6/28/2023	Serious injury	Fresno Fall From Pole	A PG&E crew was performing a pole replacement when a crew member climbing the new pole fell.
4/17/2023	Serious injury	Campbell Electric Contact	A PG&E crew was replacing a street light service line. Employee made contact with energized conductor while installing the line.
1/31/2023	Fatality	Platina Tire Changing Fatality	A PG&E vegetation management inspector was fatally injured as he was changing a tire on his vehicle.

15 Cause evaluations were performed, and corrective actions have been or are  
16 being implemented.

17 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
18 **or Higher) Compensation Levels and/or Incentives?**

19 No, in 2023, Rate of SIF Actual (Employee) was not used as a STIP metric.

20 **Is Metric Linked to the Determination of Individual or Group Performance**  
21 **Goals?**

22 Yes, Rate of SIF Actual (Employee) is linked to 2023 performance goals for  
23 one or more Director-level, or higher, position.

24 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

25 Yes, in 2023, the following position(s) include individual performance goals  
26 that are linked to Rate of SIF Actual (Employee):

- 1 • Chief: Enterprise Health & Safety (1), Generation (2), Human Resources &  
2 Enterprise Change Office (1)
- 3 • Director: Customer & Communications (1), Electric Engineering (1), Electric  
4 Operations (19), Engineering, Planning & Strategy (2), Enterprise Health &  
5 Safety (6), Gas Operations (11), Generation (16), Human Resources &  
6 Enterprise Change Office (2), Information Technology (2), Operations (28),  
7 Shared Services (8), Supply Chain (2)
- 8 • Senior Director: Customer & Communications (2), Electric Engineering (2),  
9 Electric Operations (9), Enterprise Health & Safety (4), Gas Engineering (1),  
10 Gas Operations (6), Generation (3), Operations (9), Shared Services (2);
- 11 • Vice President: Customer & Communications (2), Electric Operations (1),  
12 Enterprise Health & Safety (1), Gas Operations (2), Generation (2), Human  
13 Resources & Enterprise Change Office (1), Operations (2), Shared  
14 Services (1)
- 15 • Senior Vice President: Gas Engineering (1), Gas Operations (1),  
16 Generation (1)

17 **Bias Controls:** Data is compiled by the Enterprise Health & Safety Team.  
18 Employee SIF events are reviewed weekly. IA performed a validation of the  
19 2023 metric performance and periodically validated the controls in 2023 in place  
20 for gathering metric data and the Utility's performance in meeting the metric.

21 **Rate Case Safety Goal Progress:** This metric is specifically stated in the 2023  
22 GRC<sup>43</sup> as a safety goal metric.

23 **Monthly Data:** See Attachment A at the end of this report.

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<sup>43</sup> PG&E 2023 GRC Exhibit (PG&E-7), Chapter 1, Safety and Health, p. 1-24.

1       **Metric 16: Rate of Serious Injuries or Fatalities (SIF) Actual (Contractor)**

2       **Metric Name and Description:** Rate of SIF Actual (Contractor) is calculated  
3       using the formula: Number of SIF-Actual cases among employees x 200,000/  
4       employee hours worked, where SIF Actual is counted using the methodology  
5       developed by the Edison Electric Institute’s (EEI) Occupational Safety and  
6       Health Committee (OS&HC) Safety and Classification Learning (SCL) Model.

7       If a utility has implemented a replicable, substantially similar evaluation  
8       methodology for assessing incidents where a SIF occurred, the utility may use  
9       that method for reporting this metric. If a utility opts to report the rate of SIF  
10      Actual using a method other than the EEI SCL Model, it must explain how its  
11      methodology for counting SIF-A differs and why it chose to use it.

12      As a supplemental reporting requirement to the SIF-A Rate for comparative  
13      purposes, all utilities shall also report SIF-A Rate data based on California  
14      Division of Occupational Safety and Health (Cal/OSHA) reporting requirements  
15      under Section 6409.1 of the California Labor Code

16      **Risks:** Contractor Safety Incident

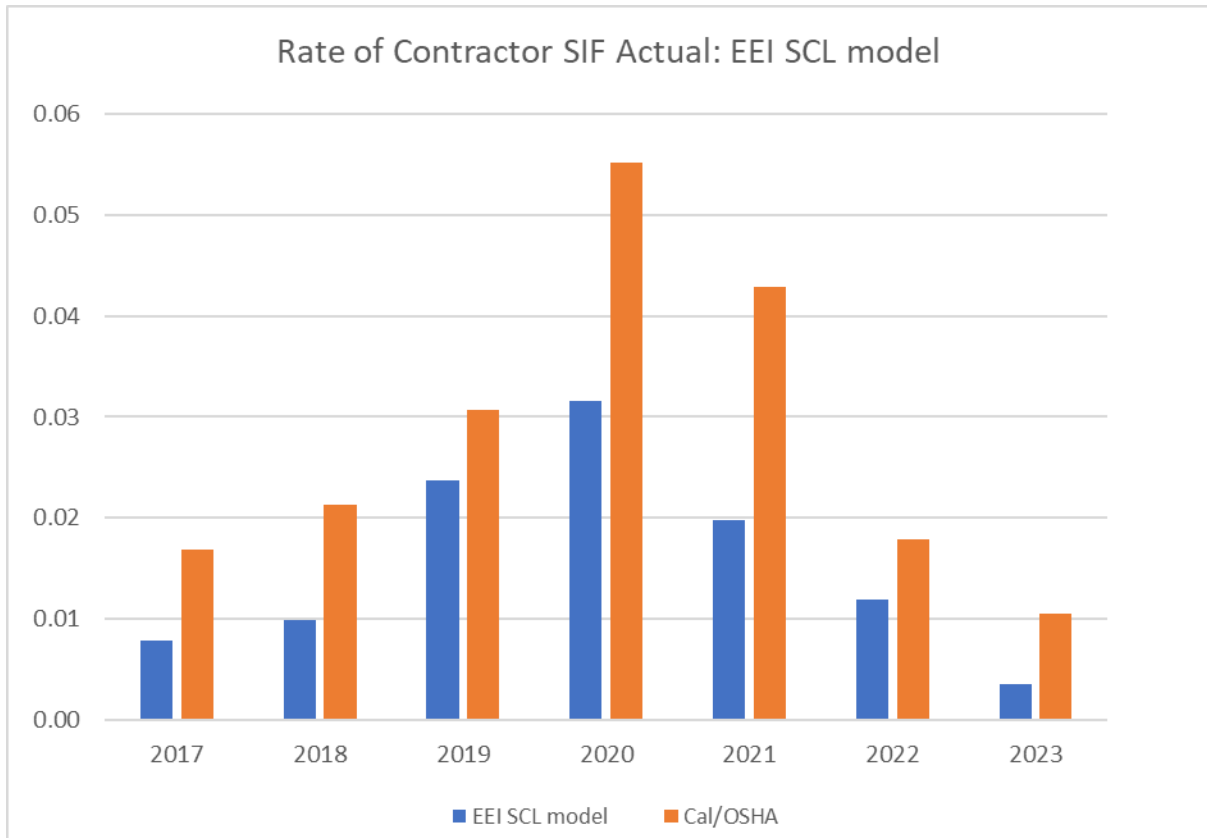
17      **Category:** Injuries

18      **Units:** Rate of SIF Actual (SIF-A) cases among contractors x 200,000/contractor  
19      hours worked



**Summary:**

**FIGURE 5-16  
RATE OF SIF ACTUAL (CONTRACTOR) EEI SCL MODEL AND CAL/OSHA<sup>(a)</sup>  
DEFINITIONS COMPARISON**



- (a) Per Cal/OSHA, a serious injury or illness is defined as one involving inpatient hospitalization, regardless of length of time, for other than medical observation or diagnostic testing; amputation; loss of an eye; or serious degree of permanent disfigurement.

2 **Narrative Context:** Pacific Gas and Electric Company's (PG&E or the  
3 Company) SIF Program was deployed at the end of 2016 to establish a  
4 classification and cause evaluation process for coworker and contractor SIF.<sup>44</sup>  
5 The goal of PG&E's SIF Program is to reduce the number and severity of safety  
6 incidents that result in a SIF. The program objective is to learn from safety  
7 incidents by performing cause evaluations on each SIF-Actual (SIF-A) and SIF

<sup>44</sup> Per I.14-08-022, Kern Order Instituting Investigation (Kern OII) (Aug. 28, 2014) Settlement Agreement with California Public Utilities Commission (CPUC) see D.15-07-014.

1 Potential (SIF-P) incident, implementing corrective actions, and sharing key  
2 findings across the enterprise.

3 In August of 2020, PG&E adopted Edison Electric International's (EEI)  
4 Safety Classification Learning (SCL) Model to mature classification of its SIF  
5 incidents.<sup>45</sup> Adopting the EEI SCL Model has improved PG&E's SIF Program  
6 by bringing a consistent and objective approach to reviewing and classifying SIF  
7 incidents and identifying high-energy tasks. The EEI SCL model does not  
8 directly define a SIF-A, rather it classifies incidents into categories: High-Energy  
9 SIF (HSIF),<sup>46</sup> Low-Energy SIF (LSIF),<sup>47</sup> Potential SIF (PSIF),<sup>48</sup> Capacity,<sup>49</sup>  
10 Exposure,<sup>50</sup> Success,<sup>51</sup> and Low Severity.<sup>52</sup> The HSIF terminology is fairly  
11 new to the industry; however, it is equivalent to a SIF-A with regard to how  
12 serious life threatening, life-altering or fatalities are determined.<sup>53</sup>  
13 While PG&E uses the EEI SCL model methodology to classify and track SIF-A  
14 incidents, PG&E's SIF Program differs slightly from the EEI model in that PG&E  
15 includes all types of Motor Vehicle Incidents (MVI) in its SIF counts, whereas the  
16 EEI SCL model does not.<sup>54</sup> PG&E believes that all MVIs (even where any injury  
17 did not occur) should be considered for SIF potentiality and will continue to

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**45** See, SCL Model at <https://esafetyline.net/eei/docs/eeiSCLmodel.pdf> at p. 17.

**46** *Id.* at p. 17, HSIF is defined as: "Incident with a release of high energy in the absence of a direct control where a serious injury is sustained."

**47** *Id.* at p. 17, LSIF is defined as: "Incident with a release of low energy in the absence of a direct control where a serious injury is sustained."

**48** *Id.* at p. 17, 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."

**49** *Id.* at p. 17, 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."

**50** *Id.* at p. 17, Exposure is defined as: "Condition where high energy is present in the absence of a direct control."

**51** *Id.* at p. 17, Success is defined as: "Condition where a high energy incident does not occur because of the presence of a direct control."

**52** *Id.* at p. 17, Low Severity is defined as: "Incident with a release of low energy where no serious injury is sustained."

**53** EEI Safety Classification and Learning (SCL) Model, SIF defined as Life-threatening or life-altering incident.

**54** This has been discussed during learning sessions with EEI and conversations with the SCL author that some MVIs do not fit within the parameters of the SCL model. PG&E uses its own MVI SIF classification process per SAFE-1002S: Motor Vehicle Standard, which is outside the SCL model classification process.

1 include them in the SIF counts. This may differ slightly from how other utilities  
2 classify and categorize contractor MVIs.

3 This SPM definition includes the use of the EEI OS&HC serious injury  
4 criteria,<sup>55</sup> which defines a serious injury using fourteen specific injury criteria. In  
5 operation, and in discussions with other utilities and EEI, PG&E finds that the  
6 OS&HC criteria does not align with the life altering/life threatening aspects of the  
7 SIF Program objective and is in contradiction to the SCL model purpose. PG&E  
8 does, however, define serious injury in its SIF Program,<sup>56</sup> which is substantially  
9 similar to the OS&HC criteria. The difference is that PG&E considers life  
10 altering/life threatening a substantial factor in serious injury determination.<sup>57</sup>  
11 As allowed by CPUC SPM definition for a SIF-A (Employee) incident, PG&E  
12 uses substantially similar criteria to classify an injury as serious, as compared to  
13 the EEI OS&HC criteria including life threatening/life altering into the SIF-A  
14 determination. This determination also includes a third-party medical consultant  
15 to review and concur with the serious designation. This model allows the  
16 Company to focus its safety and risk mitigation efforts on the most serious  
17 outcomes and highest risk work where a high energy incident occurred.

18 There have been 26 contractor SIF-A incidents between 2017 and 2023,  
19 which include 13 fatalities and 13 serious injuries. There is no common thread  
20 between the incidents. The SIF-A events encompass broad job task types  
21 including, helicopter operations, dropped objects, vegetation management, MVI  
22 or Off-Highway Utility Vehicles, and electrical contacts. One contractor SIF-A

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**55** Occupational Safety & Health Committee: Serious Injury & Fatality Criteria (SIF) can be reviewed at:  
<https://images.magnetmail.net/images/clients/EEI //attach/Environment/hsif2022.pdf>.

**56** SAFE-1100S: Serious Injury or Fatality Standard, Appendix A Examples of a Serious Injury.

**57** PG&E defines a SIF-A (analogous to a EEI SCL HSIF) as: A work-related high-energy incident consequential from work at or for PG&E that results in any of the following to employees, contractors, or directly supervised contractors:

- A fatality – work-related fatal injury or illness;
- A life-threatening injury or illness that required immediate life-preserving action that if not applied immediately would likely have resulted in the death of that person;
- A life-altering injury or illness that resulted in a permanent and significant loss of a major body part or organ function.

1 motor vehicle incident occurred in 2023 which resulted in a fatality. There were  
2 no serious injuries.

3 With regard to Cal/OSHA reporting requirements, there were 3 contractor  
4 incidents reported as serious injuries.

5 Implementation of Contractor Safety Program (CSP), in addition to  
6 executing corrective actions will drive down incidents. The CSP, evaluated as  
7 part of the 2020 RAMP Report, is in progress through 2026. Please see Metric  
8 19 narrative for additional detail about the additional programs being  
9 implemented.

10 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
11 **or Higher) Compensation Levels and/or Incentives?**

12 No, in 2023, Rate of SIF-Actual (Contractor) was not used as a STIP metric.

13 **Is Metric Linked to the Determination of Individual or Group Performance**  
14 **Goals?**

15 Yes, Rate of SIF-Actual (Contractor) is linked to 2023 performance goals for  
16 one or more Director-level, or higher, position.

17 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

18 Yes, in 2023, the following position(s) include individual performance goals  
19 that are linked to Rate of SIF-Actual (Contractor).

- 20 • Chief: Engineering, Planning & Strategy (1), Generation (2), Human  
21 Resources & Enterprise Change Office (1)
- 22 • Director: Customer & Communications (1), Electric Engineering (1), Electric  
23 Operations (19), Engineering, Planning & Strategy (4), Enterprise Health &  
24 Safety (6), Gas Operations (5), Generation (16), Human Resources &  
25 Enterprise Change Office (2), Information Technology (2), Operations (28),  
26 Shared Services (7), Supply Chain (2)
- 27 • Senior Director: Customer & Communications (1), Electric Engineering (2),  
28 Electric Operations (9), Enterprise Health & Safety (4), Gas Engineering (1),  
29 Gas Operations (4), Generation (3), Operations (9), Shared Services (2)
- 30 • Vice President: Customer & Communications (2), Electric Operations (1),  
31 Enterprise Health & Safety (2), Gas Operations (1), Generation (2), Human

- 1 Resources & Enterprise Change Office (1), Operations (2), Shared  
2 Services (1)  
3 • Senior Vice President: Gas Engineering (1), Gas Operations (1),  
4 Generation (1)

5 **Bias Controls:** Data is compiled by the Enterprise Health & Safety Team.  
6 Contractor SIF events are reviewed weekly. IA performed a validation of the  
7 2023 metric performance and periodically validated the controls in 2023 in place  
8 for gathering metric data and the Utility's performance in meeting the metric.

9 **Rate Case Safety Goal Progress:** This metric is specifically stated in the 2023  
10 GRC<sup>58</sup> as a safety goal metric.

11 **Monthly Data:** See Attachment A at the end of this report.

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<sup>58</sup> PG&E 2023 GRC Exhibit (PG&E-7), Chapter 1, Safety and Health, p. 1-24.

1 **Metric 17: Rate of Serious Injuries or Fatalities (SIF) Potential (Employee)**

2 **Metric Name and Description:** Rate of SIF Potential (Employee) is calculated  
3 using the formula:

4 Number of SIF Potential cases among employees x 200,000/employee hours  
5 worked, where a SIF incident, in this case would be events that could have led  
6 to a reportable SIF. Potential SIF incidents are identified using the Edison  
7 Electric Institute (EEI) Safety Classification and Learning Model.<sup>59</sup>

8 If a utility has implemented a replicable, substantially similar evaluation  
9 methodology for assessing SIF Potential (SIF-P), the utility may use that method  
10 for reporting this metric. If a utility opts to report the rate of SIF-P using a  
11 method other than the EEI Safety Classification Model, it must explain how its  
12 methodology for counting SIF-P differs and why it chose to use it.

13 As a supplemental reporting requirement to the rate of SIF Potential (Employee),  
14 all utilities shall provide information about the key lessons learned from Potential  
15 SIF (Employee) incidents.

16 Findings from 2023 SIF Potential incident investigations show gaps in  
17 communication, skill-based errors and standards that are not well defined or  
18 understood. The implementation of the PG&E Safety Excellence Management  
19 System (PSEMS) and stronger focus on workforce safety initiatives, such as  
20 development and training of critical risk standards, enhancing the field safety  
21 observations program, and leader engagement are intended to close these  
22 gaps.

23 **Risks:** Employee Safety Incident

24 **Category:** Injuries and Near Hits

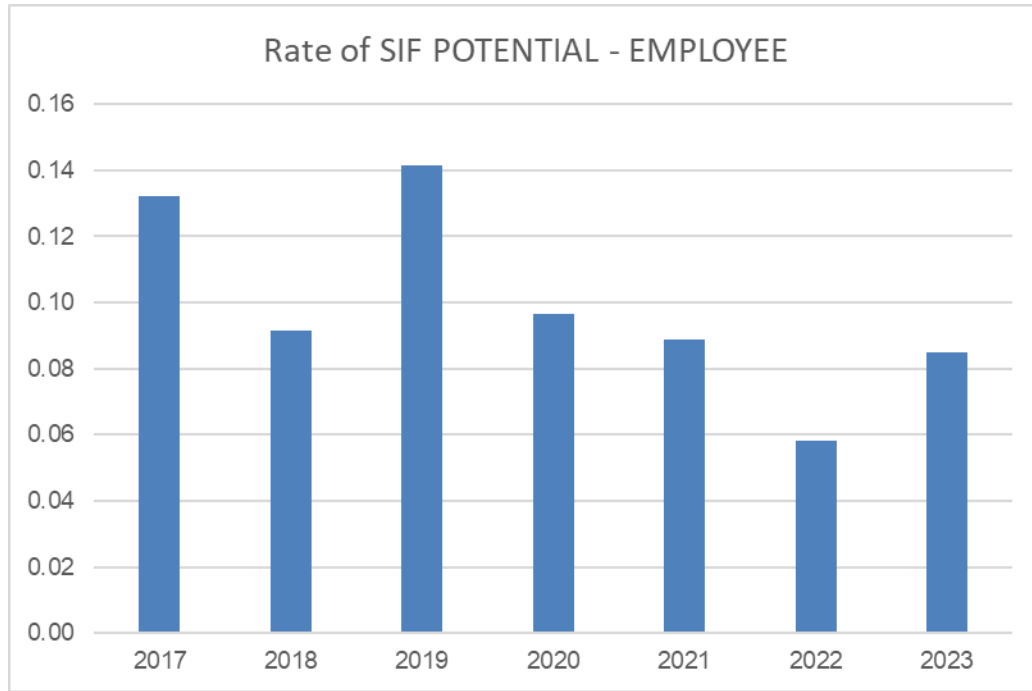
25 **Units:** Number of SIF-Potential (SIF-P) cases among employees x  
26 200,000/employee hours worked

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59 Edison Electric Institute Safety Classification and Learning Model at:  
<https://esafetyline.net/eei/docs/eeiSCLmodel.pdf>.

1 **Summary:**

**FIGURE 5-17**  
**RATE OF SERIOUS INJURIES OR FATALITIES (SIF) POTENTIAL (EMPLOYEE)**



2 **Narrative Context:** PG&E’s SIF Program was deployed at the end of 2016 to  
3 establish a classification and cause evaluation process for coworker and  
4 contractor serious injuries or fatalities.<sup>60</sup> The goal of PG&E’s SIF program is to  
5 reduce the number and severity of safety incidents that result in a SIF. The  
6 program objective is to learn from safety incidents by performing cause  
7 evaluations on each SIF-Actual (SIF-A) and SIF Potential (SIF-P) incident,  
8 implementing corrective actions, and sharing key findings across the enterprise.  
9 As such, this metric is considered bi-directional as a higher rate can indicate that  
10 employees have an increased willingness to report SIF Potential incidents. As  
11 part of PG&E’s Speak Up culture, employees and contractors are encouraged to  
12 report all safety incidents. Leaders are expected to create the space for workers  
13 to feel comfortable to speak up and escalate safety concerns and failures.

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<sup>60</sup> Per Investigation 14-08-022, Kern Order Instituting Investigation (Kern OII) (Aug. 28, 2014) Settlement Agreement with California Public Utilities Commission see Decision 15-07-014.

1 From 2016 to mid-2020, SIF-P classification was based on the reasonable  
2 chance that the incident could have resulted in a SIF-A.<sup>61</sup> This classification  
3 was subjective and left room for interpretation. In August of 2020, PG&E  
4 adopted Edison Electric International’s Safety Classification Learning (SCL)  
5 Model to classify its serious injury or fatality (SIF) incidents.<sup>62</sup> Adopting the EEI  
6 SCL Model improved PG&E’s SIF program by bringing a consistent and  
7 objective approach to reviewing and classifying SIF incidents and identifying  
8 high-energy tasks. The EEI SCL model classifies incidents into very distinct  
9 categories: High-Energy SIF (HSIF),<sup>63</sup> Low-Energy SIF (LSIF),<sup>64</sup> Potential SIF  
10 (PSIF),<sup>65</sup> Capacity,<sup>66</sup> Exposure,<sup>67</sup> Success<sup>68</sup> & Low Severity.<sup>69</sup> PG&E has  
11 fully adopted the PSIF terminology into its SIF Program.<sup>70</sup>

12 While PG&E uses the EEI SCL model methodology to classify and track SIF  
13 incidents, PG&E’s SIF program differs slightly from the EEI model in that PG&E  
14 includes all types of Motor Vehicle Incidents (MVI) in its SIF counts, whereas the  
15 EEI SCL model does not.<sup>71</sup> PG&E believes that all motor vehicle incidents

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61 SAFE-1100P-01 Rev.0 Published 03/31/0217.

62 See, SCL Model at <https://esafetyline.net/eei/docs/eeiSCLmodel.pdf> at p. 17.

63 *Id.* at p. 17, HSIF is defined as: “Incident with a release of high energy in the absence of a direct control where a serious injury is sustained.”

64 *Id.* at p. 17, LSIF is defined as: “Incident with a release of low energy in the absence of a direct control where a serious injury is sustained.”

65 *Id.* at p. 17, 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.”

66 *Id.* at p. 17, 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.”

67 *Id.* at p. 17, Exposure is defined as: “Condition where high energy is present in the absence of a direct control.”

68 *Id.* at p. 17, Success is defined as: “Condition where a high energy incident does not occur because of the presence of a direct control.”

69 *Id.* at p. 17, Low Severity is defined as: “Incident with a release of low energy where no serious injury is sustained.”

70 SAFE-1100S Rev 5, p. 10. Also, see SAFE-1100S Rev 5 Attachment 1, SIF Determination Flowchart

71 This has been discussed during learning sessions with EEI and conversations with the SCL author that some MVI’s do not fit within the parameters of the SCL model. PG&E uses its own MVI SIF classification process per SAFE-1002S: Motor Vehicle Standard, which is outside the SCL model classification process.



1 (even where any injury did not occur) should be considered for SIF potentiality  
2 and will continue to include them in the SIF counts. This may differ slightly from  
3 how other utilities classify and categorize MVIs.

4 In 2021 through 2023, PG&E saw a slight decrease in SIF-P Employee  
5 incidents. The most common events involved motor vehicle incidents. Motor  
6 vehicle program improvements have been taken to address employee incidents  
7 including, installing driver technology to monitor and track driver habits, i.e.,  
8 acceleration, hard braking, speed, etc.

9 Continued measures are being implemented by the addition of the Regional  
10 Safety Directors through safety campaigns and communications and  
11 problem-solving sessions. The implementation of the Enterprise Safety  
12 Management System and stronger focus on workforce safety initiatives, such as  
13 development of critical risk standards, enhancing the field safety observations  
14 program, leader engagement, and lean operating model, is expected to continue  
15 to reduce this trend.

16 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
17 **or Higher) Compensation Levels and/or Incentives?**

18 No, in 2023, Rate of SIF Potential (Employee) was not used as a STIP  
19 metric.

20 **Is Metric Linked to the Determination of Individual or Group Performance**  
21 **Goals?**

22 Yes, Rate of SIF Potential (Employee), is linked to 2023 individual or group  
23 performance goals as described in the next section.

24 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

25 Yes, Rate of SIF Potential (Employee), is linked to 2023 individual  
26 performance goals for Director-level, or higher, positions.

- 27 • **Chief:** Enterprise Health and Safety (1), Generation (2), Human Resources  
28 & Enterprise Change Office (1)
- 29 • **Director:** Customer & Communications (1), Electric Engineering (1),  
30 Electric Operations (19), Engineering, Planning & Strategy (1), Enterprise  
31 Health and Safety (6), Gas Operations (11), Generation (16), Human

- 1 Resources & Enterprise Change Office (2), Information Technology (2),  
2 Operations (28), Shared Services (7), Supply Chain (2)
- 3 • **Senior Director:** Customer & Communications (2), Electric Engineering (1),  
4 Electric Operations (9), Enterprise Health & Safety (4), Gas Engineering (1),  
5 Gas Operations (6), Generation (3), Operations (9), Shared Services (2)
  - 6 • **Vice President:** Customer & Communications (2), Electric Operations (1),  
7 Enterprise Health & Safety (1), Gas Operations (2), Generation (2),  
8 Operations (2), Human Resources & Enterprise Change Office (1),  
9 Operations (2), Shared Services (1)
  - 10 • **Senior Vice President:** Gas Engineering (1), Generation (1)
  - 11 • **Bias Controls:** SIF events are reviewed weekly by Enterprise Health &  
12 Safety

13 **Rate Case Safety Goal Progress:** This metric is not specifically stated in the  
14 2023 GRC as a safety goal metric. This metric is tracked internally as track and  
15 trend only.

16 **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 18: Rate of Serious Injuries or Fatalities (SIF) Potential (Contractor)**

2 **Metric Name and Description:** Rate of SIF Potential (contractor) is calculated  
3 using the formula:

4 Number of SIF Potential cases among contractors x 200,000/contractor hours  
5 worked, where a SIF incident, in this case would be events that could have led  
6 to a reportable SIF. Potential SIF incidents are identified using the EEI Safety  
7 Classification and Learning Model.<sup>72</sup>

8 If a utility has implemented a replicable, substantially similar evaluation  
9 methodology for assessing SIF Potential (SIF-P), the utility may use that method  
10 for reporting this metric. If a utility opts to report the rate of SIF-P using a  
11 method other than the EEI Safety Classification Model, it must explain how its  
12 methodology for counting SIF-P differs and why it chose to use it.

13 As a supplemental reporting requirement to the Rate of SIF Potential  
14 (Contractor), all utilities shall provide information about key lessons learned from  
15 SIF-P (Contractor) incidents.

16 Findings from 2023 SIF Potential incident investigations show gaps in  
17 communication and job safety analysis completion, skill-based knowledge, and  
18 safe work standards and procedures that are not well defined or understood.

19 Continuous improvement of the Contractor Safety pre-qualification and  
20 Functional Area oversight programs to address program gaps include Contractor  
21 Safety Quality Assurance Reviews (CSQARs) which are conducted with  
22 selected Contractors with adverse trends in safety performance and who are at  
23 risk of experiencing a Serious Injury or Fatality and, implementation of the SIF  
24 Capacity & Learning model which redefines safety as measured by the presence  
25 of essential controls and the ability to experience failures safely.

26 Also expected to help reduce SIF P events involving contractors is the  
27 implementation of the PG&E Safety Excellence Management System (PSEMS)

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72 Edison Electric Institute Safety Classification and Learning Model at:  
<https://esafetyline.net/eei/docs/eeiSCLmodel.pdf>.

1 and stronger focus on workforce safety initiatives, such as development of  
2 critical risk standards, enhancing the field safety observations program, leader  
3 engagement, and lean operating model.

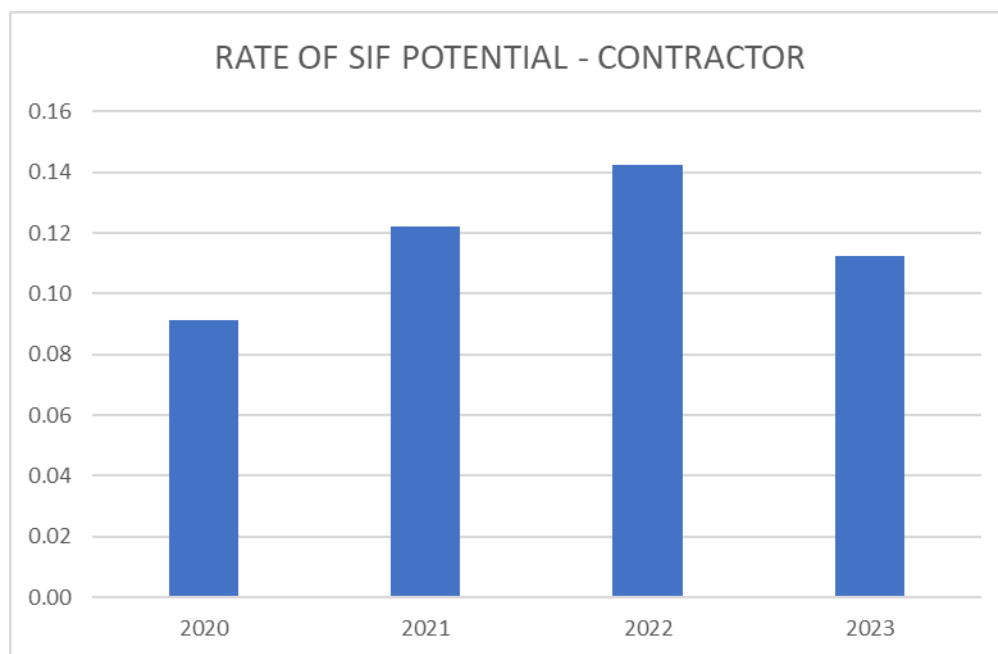
4 **Risks:** Contractor Safety Incident

5 **Category:** Injuries & Near Hits

6 **Units:** Number of SIF-Potential (SIF-P) cases among employees x  
7 200,000/contractor hours worked

8 **Summary:**

**FIGURE 5-18**  
**RATE OF SERIOUS INJURIES OR FATALITIES (SIF) POTENTIAL (CONTRACTOR)**



9 **Narrative Context:** PG&E’s Serious Injury or Fatality (SIF) program was  
10 deployed at the end of 2016 to establish a classification and cause evaluation  
11 process for coworker and contractor serious injuries or fatalities.<sup>73</sup> The goal of  
12 PG&E’s SIF program is to reduce the number and severity of safety incidents  
13 that result in a SIF. The program objective is to learn from safety incidents by

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<sup>73</sup> Per I.14-08-022, Kern Order Instituting Investigation (Kern OII) (Aug. 28, 2014) Settlement Agreement with California Public Utilities Commission see Decision 15-07-014.

1 performing cause evaluations on each SIF-Actual (SIF-A) and SIF Potential  
2 (SIF-P) incident, implementing corrective actions, and sharing key findings  
3 across the enterprise. As such, this metric is considered bi-directional as a  
4 higher rate can indicate that employees and contractors have an increased  
5 willingness to report SIF Potential incidents. As part of PG&E's Speak Up  
6 culture, employees and contractors are encouraged to report all safety incidents.  
7 In June of 2020, PG&E expanded the SIF program to include investigating  
8 contractor incidents rising to SIF-P classification.<sup>74</sup> This increased the number  
9 and types of injuries and incidents that contractors are required to report in 2020  
10 through 2022. Prior to 2020, only contractor incidents that resulted in a SIF-A<sup>75</sup>  
11 were investigated by PG&E. The contractor was responsible for investigating all  
12 other incidents and reporting action plans back to PG&E.  
13 From 2017 to mid-2020, SIF-P classification was based on the reasonable  
14 chance that the incident could have resulted in a SIF-A.<sup>76</sup> This classification  
15 was subjective and left room for interpretation. In August of 2020, PG&E  
16 adopted Edison Electric International's Safety Classification Learning (SCL)  
17 Model to classify its serious injury or fatality (SIF) incidents.<sup>77</sup> Adopting the EEI  
18 SCL Model improved PG&E's SIF program by bringing a consistent and  
19 objective approach to reviewing and classifying SIF incidents and identifying  
20 high-energy tasks. The EEI SCL model classifies incidents into very distinct  
21 categories: High-Energy SIF (HSIF),<sup>78</sup> Low-Energy SIF (LSIF),<sup>79</sup> Potential SIF

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**74** SAFE-1100S-B001: Contractor SIF-P Incidents: Requiring SIF-P Incidents and Cause Evaluations Published 6/2020.

**75** Per SAFE-1100S Rev.00 (2017): Serious Injury or Fatality Standard, an incident resulting in a fatality or serious injury that was life threatening or life altering.

**76** SAFE-1100P-01 Rev.0 Published 03/31/0217.

**77** See, SCL Model at <https://esafetyline.net/eei/docs/eeiSCLmodel.pdf> at p. 17.

**78** *Id.* at p. 17, HSIF is defined as: "Incident with a release of high energy in the absence of a direct control where a serious injury is sustained."

**79** *Id.* at p. 17, LSIF is defined as: "Incident with a release of low energy in the absence of a direct control where a serious injury is sustained."

1 (PSIF),<sup>80</sup> Capacity,<sup>81</sup> Exposure,<sup>82</sup> Success<sup>83</sup> & Low Severity.<sup>84</sup> PG&E has  
2 fully adopted the PSIF terminology into its SIF Program.<sup>85</sup>

3 While PG&E uses the EEI SCL model methodology to classify and track SIF  
4 incidents, PG&E's SIF program differs slightly from the EEI model in that PG&E  
5 includes all types of Motor Vehicle Incidents (MVI) in its SIF counts, whereas the  
6 EEI SCL model does not.<sup>86</sup> PG&E believes that all motor vehicle incidents  
7 (even where any injury did not occur) should be considered for SIF potentiality  
8 and will continue to include them in the SIF counts. This may differ slightly from  
9 how other utilities classify and categorize MVIs.

10 Between 2020 and 2023, there have been a total of 131 SIF-P contractor  
11 incidents. The most common events involved electrical contacts, motor vehicle  
12 incidents and falls from heights (electrical poles and trees). As discussed  
13 above, PG&E is continuing to implement Contractor Safety pre-qualification and  
14 Functional Area oversight program improvements through the Regional Safety  
15 Directors including safety campaigns and communications, problem-solving  
16 sessions, and contractor safety oversight improvement.

17 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
18 **or Higher) Compensation Levels and/or Incentives?**

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80 *Id.* at p. 17, 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."

81 *Id.* at p. 17, 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."

82 *Id.* at p. 17, Exposure is defined as: "Condition where high energy is present in the absence of a direct control."

83 *Id.* at p. 17, Success is defined as: "Condition where a high energy incident does not occur because of the presence of a direct control."

84 *Id.* at p. 17, Low Severity is defined as: "Incident with a release of low energy where no serious injury is sustained."

85 SAFE-1100S Rev 5, p. 10. Also, see SAFE-1100S Rev 5 Attachment 1, SIF Determination Flowchart.

86 This has been discussed during learning sessions with EEI and conversations with the SCL author that some MVI's do not fit within the parameters of the SCL model. PG&E uses its own MVI SIF classification process per SAFE-1002S: Motor Vehicle Standard, which is outside the SCL model classification process.

1 No, in 2023, Rate of SIF Potential (contractor), was not used as a STIP  
2 metric.

3 **Is Metric Linked to the Determination of Individual or Group Performance**  
4 **Goals?**

5 Yes, Rate of SIF Potential (contractor), is linked to 2023 individual or group  
6 performance goals for one or more Director-level, or higher, position.

7 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

8 Yes, in 2023, the following position(s) include individual performance goals  
9 that are linked to Rate of SIF Potential (Contractor).

- 10 • **Chief:** Enterprise Health and Safety (1), Human Resources & Enterprise  
11 Change Office (1)
- 12 • **Director:** Customer & Communications (1), Electric Engineering (1),  
13 Electric Operations (19), Engineering, Planning & Strategy (3), Enterprise  
14 Health and Safety (6), Gas Operations (4), Generation (7), Human  
15 Resources & Enterprise Change Office (2), Information Technology (1),  
16 Operations (24), Shared Services (8), Supply Chain (1)
- 17 • **Senior Director:** Customer & Communications (1), Electric Engineering (1),  
18 Electric Operations (9), Enterprise Health & Safety (4), Gas Engineering (1),  
19 Gas Operations (4), Generation (1), Operations (9), Shared Services (2)
- 20 • **Vice President:** Customer & Communications (2), Electric Operations (1),  
21 Enterprise Health & Safety (1), Gas Operations (1), Generation (1), Human  
22 Resources & Enterprise Change Office (1), Operations (2), Shared Services  
23 (1)
- 24 • **Senior Vice President:** Gas Engineering (1), Generation (1)

25 **Bias Controls:** SIF events are reviewed weekly by Enterprise Health & Safety

26 **Rate Case Safety Goal Progress:** A rate of SIF Potential (Contractor) metric is  
27 not stated in the 2023 GRC Safety and Health chapter (Chapter 1). This metric  
28 is tracked internally as track and trend only.

29 **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 19: Contractor DART**

2 **Metric Name and Description:** Contractor DART – DART Rate: DART Cases  
3 include OSHA recordable LWD Cases and injuries that involve job transfer or  
4 restricted work activity. DART Rate is calculated as DART Cases times 200,000  
5 divided by contractor hours worked.<sup>87</sup>

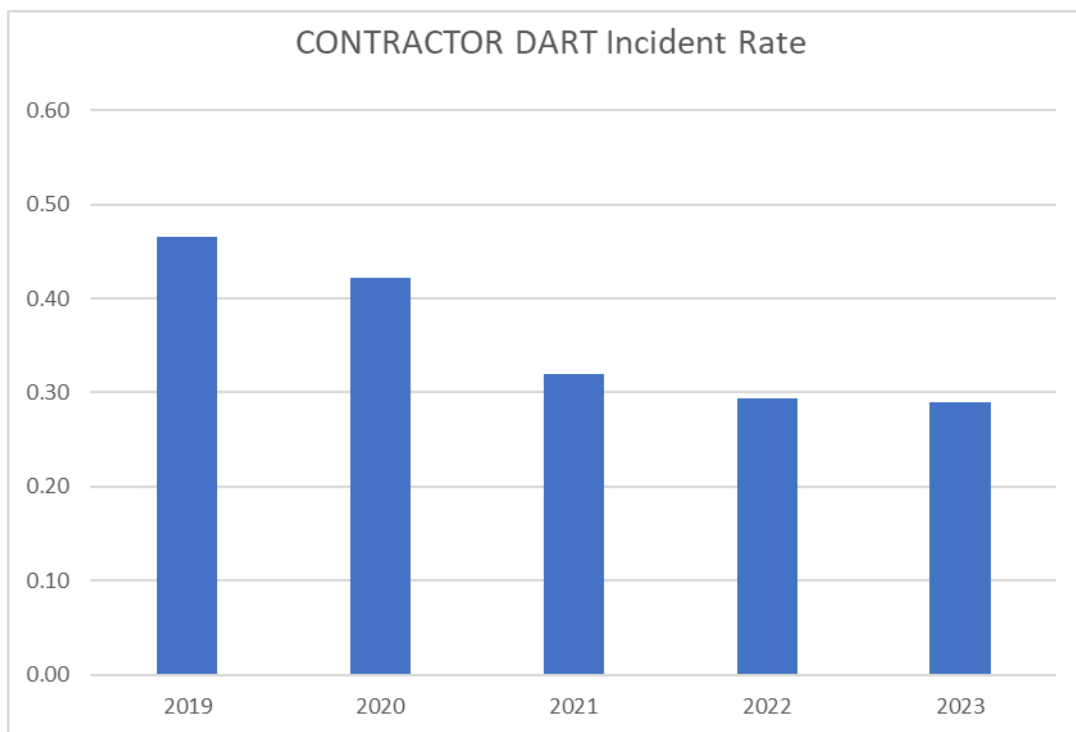
6 **Risks:** Contractor Safety Incident<sup>88</sup>

7 **Category:** Injuries

8 **Units:** OSHA recordable times 200,000 divided by contractor hours worked  
9 associated with work for the reporting utility

10 **Summary:**

**FIGURE 5-19  
CONTRACTOR DART RATE METRIC DATA (ANNUAL)**



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<sup>87</sup> Contractors included are performing medium to high-risk work.

<sup>88</sup> The Corporate Risk Register includes the following risk: Contractor Safety Incident.



1 **Narrative Context:** Contractor DART case rate data became available with the  
2 implementation of the Contractor Safety Program which was fully in place at the  
3 beginning of 2017. Pacific Gas and Electric Company (PG&E) did not track this  
4 metric prior to 2017. Data show that DART case rates for PG&E contractors  
5 decreased from 2018 through 2023 with the increase in the PG&E contractor  
6 workforce. This is due to the continuous improvement of the Contractor Safety  
7 pre-qualification and Functional Area oversight programs. Planned program  
8 mitigations include Contractor Safety Quality Assurance Reviews (CSQARs)  
9 which are conducted with selected Contractors with adverse trends in safety  
10 performance and who are at risk of experiencing a Serious Injury or Fatality and,  
11 implementation of the SIF Capacity & Learning model which redefines safety as  
12 measured by the presence of essential controls and the ability to experience  
13 failures safely.

14 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
15 **or Higher) Compensation Levels and/or Incentives?**

16 No, in 2023, Contractor DART – DART Rate was not used as a STIP metric.

17 **Is Metric Linked to the Determination of Individual or Group Performance**  
18 **Goals?**

19 Yes, Contractor DART – DART Rate is linked to 2023 individual or group  
20 performance goals for one or more Director-level, or higher, position.

21 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

22 Yes, in 2023, the following position(s) include individual performance goals  
23 that are linked to Contractor DART – DART Rate:

- 24 • **Chief:** Generation (2)
- 25 • **Director:** Corporate Affairs (1), Electric Engineering (1), Electric Operations  
26 (14), Engineering, Planning & Strategy (3), Gas Operations (3), Generation  
27 (13), Operations (2), Information Technology (1), Shared Services (1) ,  
28 Supply Chain (1)
- 29 • **Senior Director:** Customer & Communications (1), Electric Engineering (2),  
30 Electric Operations (6), Generation (3), Operations (2), Shared Services (1)
- 31 • **Vice President:** Customer & Communications (1), Electric Operations (2),  
32 Gas Operations (1), Generation (2)

1       •   **Senior Vice President:** Gas Operations (1), Generation (1)

2       **Bias Controls:** OSHA regulates the definition of a DART case. The PG&E  
3       specific information is self-reported by the contractors. The contractor company  
4       OSHA logs are verified annually by an external third party.

5       **Rate Case Safety Goal Progress:** This metric was not a stated metric in the  
6       2023 GRC Enterprise Safety and Health chapter (Chapter 1). The Narrative  
7       Context section above summarizes the continued steps PG&E is taking to  
8       reduce the Contractor DART Rate.

9       **Monthly Data:** See Attachment A at the end of this report.

1       **Metric 20: Public SIF**

2       **Metric Name and Description:** Public serious injuries or fatalities (SIF) –  
3       A fatality or personal injury requiring in-patient hospitalization involving utility  
4       facilities or equipment. Equipment includes utility vehicles used during the  
5       course of business.

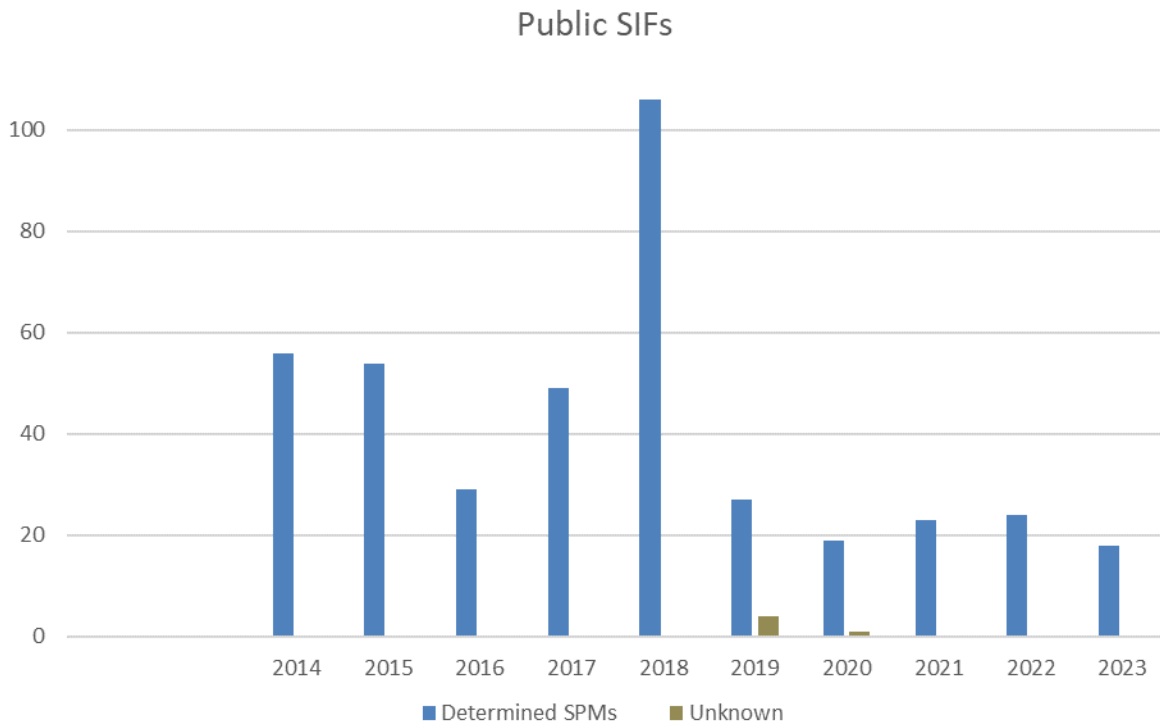
6       **Risks:** For the 2024 Risk Assessment and Mitigation Phase (RAMP) filing,  
7       Public Contact with Intact Energized Electrical Equipment replaces the  
8       Third-Party Safety Incident risk (Public Safety).

9       **Category:** Injuries

10      **Units:** Number of SIF

11      **Summary:**

**FIGURE 5-20  
PUBLIC SIF METRIC DATA (ANNUAL)**



Note: At this time PG&E has included injuries reported with the Kincadee (2019), and Zogg (2020) wildfires as unknown subject to additional review.

1 **Narrative Context:** The Public SIF metric includes all public safety incidents  
 2 involving a Pacific Gas and Electric Company (PG&E) asset, where a member of  
 3 the public was seriously injured, regardless of assigned fault. The data is  
 4 reported by the total number of injuries per incident. In general, the number of  
 5 Public SIF incidents (and injuries) has trended down since 2014, with the  
 6 exception of the incidents in 2018 due to wildfires. Excluding wildfire, the  
 7 primary drivers for the incidents include motor vehicle/distribution pole incidents,  
 8 third-party electrical contact, and incidents on PG&E hydroelectric owned or  
 9 managed property including drownings.<sup>89</sup>

10 In 2023, there were 18 confirmed Public Safety Incidents meeting the Safety  
 11 Performance Metric Public SIF definition (involving a PG&E asset regardless of

<sup>89</sup> For Fire Ignition metric information see Metric 4. For electrical contact information see Metrics 1 and 2. Public SIF related to the failure of an asset are included in the risk analysis for asset-based event risks.

1 fault) that resulting in 11 serious injuries and 7 fatalities. The confirmed public  
2 incidents included:

- 3 • Eight electrical contacts (4 serious injuries, 4 fatalities);
- 4 • One car-pole incident (1 serious injury);
- 5 • Five Company or Contractor Motor Vehicle Incidents (4 serious injuries,  
6 1 fatality);
- 7 • Three incidents involving members of the public using a PG&E owned or  
8 managed recreational area (3 fatalities due to drowning); and
- 9 • One Job Site incident (1 serious injury).
- 10 • One wires down (de-energized) and motorcycle involvement.

11 The downward trend in public safety incidents can be attributed to the  
12 broader asset management programs in Electric Operations (EO) (including  
13 Wildfire mitigation), Gas Operations (GO) and Power Generation. It should be  
14 noted that four Public SIF incidents not previously reported have been added to  
15 the 2023 report. They include:

- 16 • 3/27/2022 – MVI (Third Party Involved) – Bicycle collision resulting in a  
17 serious injury;
- 18 • 5/4/2022 – Electric Contact – Car pole resulted in a low hanging and  
19 subsequent fire. Third party attempted to put out the fire and contacted the  
20 energized line resulting in a serious injury;
- 21 • 10/18/2022 – Electric Contact – Third party vehicle hit a pole and caused it  
22 to fall into the street. Another vehicle made contact with the pole or guy wire  
23 and caused the guy wire to strike a third party individual resulting in a  
24 serious injury;
- 25 • 12/26/2022 – car pole fatality (added March 7, 2024, not included in the  
26 January 31, 2024, submittal); and
- 27 • 9/30/2023 – Third party motorcyclist contact with de-energized wires down  
28 (reported February 10, 2024, not included in the January 31, 2024,  
29 submittal).

30 In 2020, a risk was added to the PG&E enterprise risk register to place  
31 increased emphasis on Public SIFs that are unrelated to a PG&E asset failure or  
32 incorrect operations. The 2024 RAMP filing will include the 3rd-Party (Human)  
33 Contact with Intact Electric Equipment risk which focuses on public contact with  
34 intact energized .lines Risk reduction leverages Functional Area (previously

1 Line of Business) controls and mitigations specific to public safety including EO,  
2 GO, and Hydroelectric Operations Public Awareness and Job Site Safety  
3 programs, EO Transmission and Distribution safety design requirements, GO  
4 physical security controls including Meter Protection, and Hydroelectric Dam  
5 Surveillance monitoring and warning systems and signage.

6 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
7 **or Higher) Compensation Levels and/or Incentives?**

8 No, in 2023, Public SIF was not used as a STIP metric.

9 **Is Metric Linked to the Determination of Individual or Group Performance**  
10 **Goals?**

11 Yes, Public SIF, is linked to 2023 individual or group performance for one or  
12 more Director-level, or higher, position.

13 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

14 Yes, in 2023, the following position(s) include individual performance goals  
15 that are linked to Public SIF:

- 16 • **Chief:** Generation (2), Operations (1)
- 17 • **Director:** Engineering Planning & Strategy (3), Gas Operations (7),  
18 Generation (15), Shared Services (4), Supply Chain (1)
- 19 • **Senior Director:** Gas Operations (2), Generation (3), Operations (1),  
20 Shared Services (1)
- 21 • **Vice President:** Generation (2), Gas Operations (1)
- 22 • **Senior Vice President:** Generation (1)

23 **Bias Controls:** This data is reviewed and compiled by PG&E's Law  
24 Department. IA performed a validation of the 2023 metric performance.

25 **Rate Case Safety Goal Progress:** The Third-Party Safety Incident risk was  
26 added to the PG&E event-based risk register in 2020 to place greater emphasis  
27 on third party safety incidents that do not involve the failure of a PG&E asset. A  
28 third-party safety incident metric is not stated in the 2023 GRC Safety and  
29 Health chapter (Chapter 1).

1           The Public SIF metric dataset was used with the 2020 RAMP<sup>90</sup> and 2024  
2 RAMP analyses. For the 2024 RAMP filing this risk has been refined to Public  
3 Contact with Intact Energized Electrical Equipment to place greater emphasis on  
4 hazards associated with intact and energized electrical equipment.

5           See the Narrative Context explanation above for explanation of steps PG&E  
6 is taking to reduce the Public SIF rate.

7           **Monthly Data:** See Attachment A at the end of this report.

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<sup>90</sup> PG&E 2020 RAMP Report, Chapter 15, Risk Mitigation Plan: Third-Party Safety Incident.

1 **Metric 21: Helicopter/Flight Accident or Incident**

2 **Metric Name and Description:** Helicopter/Flight Accident or Incident – Defined  
3 by Federal Aviation Regulations, reportable to the Federal Aviation  
4 Administration per 49 Code of Federal Regulations (CFR) Section 830.

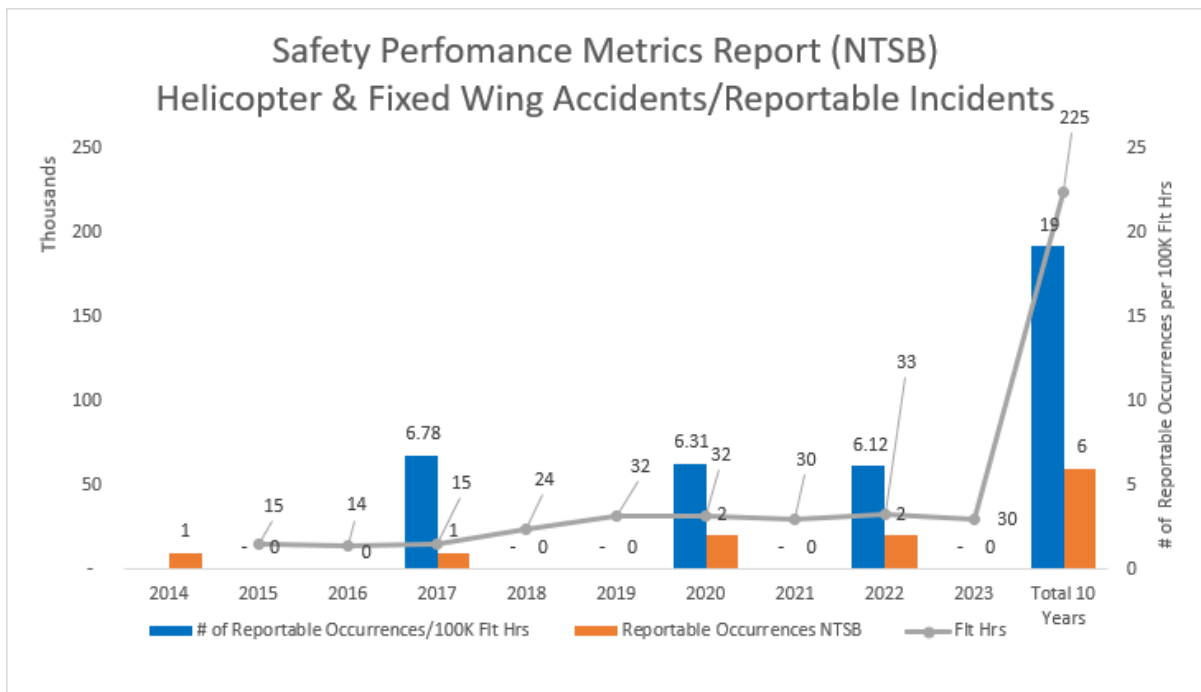
5 **Risks:** Aviation Incident, Public Contact with Intact Energized Electrical  
6 Equipment, Contractor Safety Incident, and Employee Safety Incident.<sup>91</sup>

7 **Category:** Vehicle

8 **Units:** Number of accidents or incidents (as defined in 49 CFR Section 830.5  
9 “Immediate Notification”) per 100,000 flight hours.

10 **Summary:**

**FIGURE 5-21  
HELICOPTER/FLIGHT ACCIDENT OR INCIDENT METRIC DATA (ANNUAL)**



Note: Annual flight data for 2014 is not provided due to lower confidence in accuracy.

<sup>91</sup> The Corporate Risk Register now has the following risks: Aviation Incident, Employee Safety Incident, Contractor Safety Incident, and Public Contact with Intact Energized Electrical Equipment.



1 **Narrative Context:** For the past 10 years, there have been six reportable  
2 incidents per 49 CFR 830.5.

3 There were no reportable incidents in 2023.

4 **Risk Reduction Measures:**

- 5 • Helicopter Operations contracted a third-party auditor to conduct a gap  
6 analysis of all Helicopter Contractors to the International Standards for  
7 Business Aviation Organization (IS-BAO). This gap analysis was reviewed  
8 with all the contractors to support their pursuit of IS-BAO certification.  
9 Forty percent have obtained the certification in 2023.
- 10 • Helicopter Operations has reduced the number of helicopter contractors by  
11 52%, improving management oversight.
- 12 • Aviation services developed and implemented a comprehensive training and  
13 qualification program for all internal and external FAA-licensed pilots.
- 14 • In 2023, Aviation Services, Fixed Wing Operations completed a third-party  
15 audit and was granted Stage II certification by the International Standards  
16 for Business Aviation Organization (IS-BAO), and is preparing for their  
17 Stage III certification in 2025.
- 18 • Aviation Services deployed the first phase of their newly developed Flight  
19 Management System (FMS) software package, improving their process  
20 adherence and controls, support a new technical review process, and  
21 provide improved flight data management and operational control.

22 **Is Metric Used for the Purposes of Determining Executive (Director Level  
23 or Higher) Compensation Levels and/or Incentives?**

24 No, in 2023, Helicopter/Flight Accident or Incident was not as a STIP metric.

25 **Is Metric Linked to the Determination of Individual or Group Performance  
26 Goals?**

27 Yes, Helicopter/Flight Accident or Incident is linked to 2023 individual or  
28 group performance goals for one or more Director-level, or higher, position.

29 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

30 Yes, in 2023, the following position(s) include individual performance goals  
31 that are linked to Helicopter/Flight Accident or Incident:

- 1 • **Director:** Shared Services (1)
- 2 • **Vice President:** Shared Services (1)

3 **Bias Controls:** None.

4 **Rate Case Safety Goal Progress:** This metric does not represent a 2023 GRC  
5 stated safety goal. This metric is a key risk indicator for the Aviation Incident  
6 risk.

7 **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 22: Percentage of Serious Injury and Fatality (SIF) Corrective**  
2 **Actions Completed on Time**

3 **Metric Name and Description:** percentage of Serious Injury or Fatality (SIF)  
4 Corrective Actions Completed on Time. A SIF corrective action is one that is  
5 tied to a SIF actual or potential injury or near hit.

6 **Risks:** Employee Safety Incident, Contractor Safety Incident, and Motor Vehicle  
7 Safety Incident.<sup>92</sup>

8 **Category:** Injuries and Near Hits

9 **Units:** Total number of SIF corrective actions completed on time (as measured  
10 by the due date accepted by LOB Corrective Action Review Boards) divided by  
11 the total number of SIF corrective actions past due or completed.

12 **Summary:**

**FIGURE 5-22**  
**SIF TIMELINESS OF CORRECTIVE ACTIONS METRIC DATA (ANNUAL)**



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<sup>92</sup> The Corporate Risk Register now has the following risks Employee Safety Incident, Contractor Safety Incident, and Motor Vehicle Safety Incident.

1 **Narrative Context:** Corrective action timeliness is a key ingredient to ensuring  
2 that measures are taken to strengthen the capacity to work safe while  
3 performing high-energy job tasks by implementing effective direct controls.  
4 Between 2017 and 2019, Pacific Gas and Electric Company (PG&E) had an  
5 average corrective action timeliness rate of 96-percent. In 2020, it dropped to  
6 79-percent. The drop in 2020 can largely be attributed to the pandemic, which  
7 caused cancellations of field visits and delayed shipment of tools or materials  
8 required to complete corrective actions on time. In addition, in 2020, PG&E  
9 prohibited the extension of any corrective actions related to SIF incidents,  
10 without justification and the Chief Safety Officer's approval. In previous years,  
11 approval to extend due dates was based on the line of business action owner  
12 and their leadership. Since 2021, corrective actions have been consistently  
13 completed on time with annual average of 97 to 98 percent.

14 PG&E continues to monitor and review corrective actions on a weekly basis  
15 to ensure the support, tools and resources are available to complete actions on  
16 time and with quality.

17 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
18 **or Higher) Compensation Levels and/or Incentives?**

19 No, in 2023, percentage of Serious Injury or Fatality (SIF) Corrective Actions  
20 Completed on Time was not used as a STIP metric.

21 **Is Metric Linked to the Determination of Individual or Group Performance**  
22 **Goals?**

23 Yes, percentage of Serious Injury or Fatality (SIF) Corrective Actions  
24 Completed on Time is linked to 2023 individual or group performance goals for  
25 one or more Director-level, or higher, position.

26 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

27 Yes, in 2023, the following position(s) include individual performance goals  
28 that are linked to percentage of Serious Injury or Fatality (SIF) Corrective  
29 Actions Completed on Time:

- 30 • **Director:** Customer & Communications (1); Enterprise Health & Safety (2),  
31 Operations (1)

32 **Bias Controls:** None

- 1 **Rate Case Safety Goal Progress:** This metric was a stated Key Safety Metric
- 2 in Table 1-1 of the 2023 GRC testimony on Safety and Health.<sup>93</sup>
- 3 **Monthly Data:** See Attachment A at the end of this report.

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<sup>93</sup> PG&E GRC Exhibit (PG&E-7), Chapter 1, Safety and Health, p. 1-22.

1 **Metric 23: Hard Brake Rate**

2 **Metric Name and Description:** Hard Brake Rate – The total number of hard  
3 braking events (greater than or equal to 8 mph per second decrease in speed)  
4 per thousand miles driven in a given period.

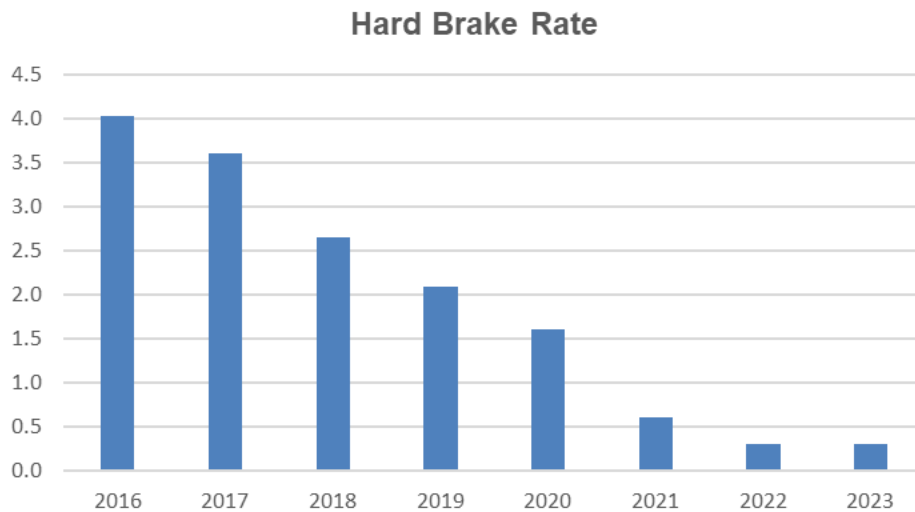
5 **Risks:** Motor Vehicle Safety Incident<sup>94</sup>

6 **Category:** Vehicle

7 **Units:** Total number of hard braking events per thousand miles driven in a  
8 given period.

9 **Summary:**

**FIGURE 5-23  
HARD BRAKE RATE METRIC DATA (ANNUAL)**



10 **Narrative Context:** PG&E began tracking the hard brake rate metric in 2016.  
11 The hard brake rate has been in steady decline between 2016 and 2023 with  
12 2023 remaining relatively the same as 2022. During the 2022-2023 time period,  
13 the number of vehicles tracking hard braking has also remained relatively the  
14 same.

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<sup>94</sup> The Corporate Risk Register now has the following risks: Motor Vehicle Safety Incident.

1 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
2 **or Higher) Compensation Levels and/or Incentives?**

3 No, in 2023, Hard Brake Rate was not used as a STIP metric.

4 **Is Metric Linked to the Determination of Individual or Group Performance**  
5 **Goals?**

6 Yes, Hard Brake Rate is linked to 2023 individual or group performance  
7 goals for one or more Director-level, or higher, position.

8 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

9 Yes, in 2023, the following position(s) include individual performance goals  
10 are linked to Hard Brake Rate :

- 11 • **Director:** Gas Operations (5)
- 12 • **Senior Director:** Gas Operations (2)
- 13 • **Vice President:** Gas Operations (1)

14 **Bias Controls:** Data on Hard Brake Rate is provided by a third-party vendor.

15 **Rate Case Safety Goal Progress:** This metric is specifically stated in the 2023  
16 GRC. It is also part of the Safe Driving Rate metric, which also includes Hard  
17 Acceleration. For 2023, this metric is track and trend and does not have a  
18 corresponding target.<sup>95</sup>

19 **Monthly Data:** See Attachment A at the end of this report.

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<sup>95</sup> PG&E 2023 GRC Exhibit (PG&E-7), Chapter 1, Safety and Health, p. 1-24.

1 **Metric 24: Driver’s Call Complaint Rate**

2 **Metric Name and Description:** Driver’s Call Complaint Rate – This metric  
3 measures the total number of Drivers Alert complaint reports received per  
4 1 million miles driven by vehicles included in the Drivers Alert Program. Driver  
5 reports are received from the “How Am I Driving” hotline or generated from  
6 telematics data. Supervisors are required to investigate, take corrective  
7 measures, and submit the investigation report for report notifications within 5  
8 working days. Driver complaint reports feed into the Safe Driver Coaching  
9 Program and are included on the Driver’s Scorecard.

10 **Risk:** Motor Vehicle Safety<sup>96</sup>

11 **Category:** Motor Vehicle

12 **Units:** Total number of Drivers Alert complaint reports received per 1 million  
13 miles driven

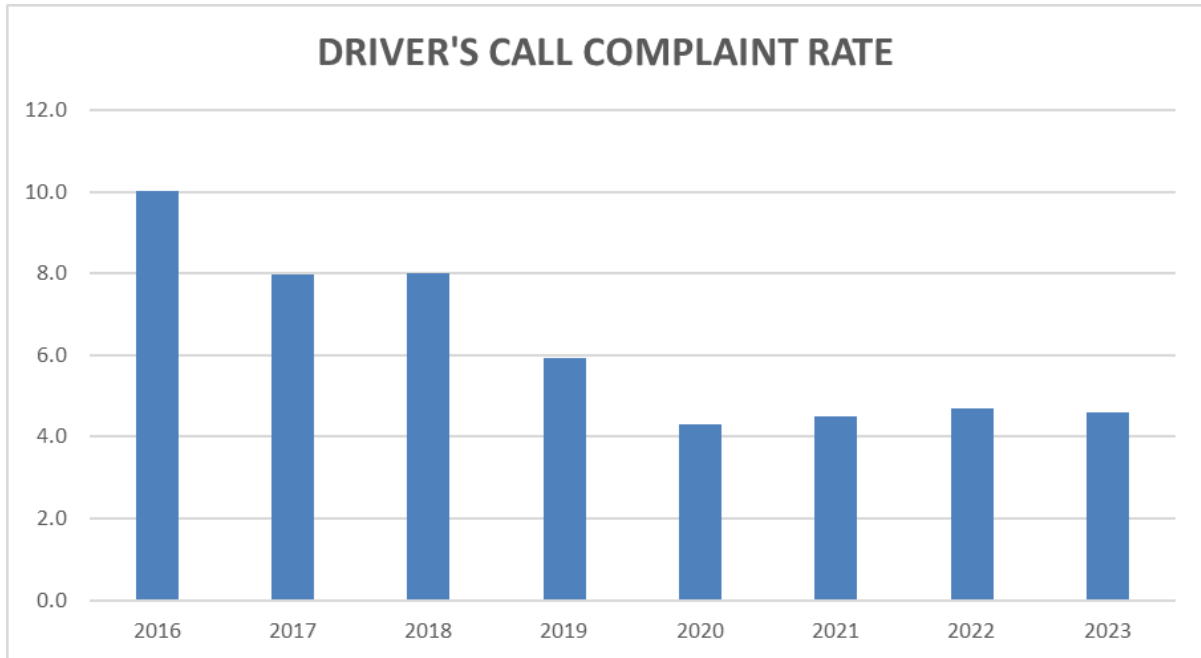
14 **Summary:**

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<sup>96</sup> The Corporate Risk Register now has the following risks: Motor Vehicle Safety Incident.



**FIGURE 5-24  
DRIVER'S CALL COMPLAINT RATE METRIC DATA (ANNUAL)**



1 **Narrative Context:** PG&E began tracking this metric in 2016. The driver  
2 complaint rate has dropped over 50 percent since 2016. There was a slight  
3 uptick in this metric in 2022 due to the introduction of a new report type  
4 regarding speeding events that are generated from our telematics data, but the  
5 rate has normalized and returned to a downward trend in 2023. For every  
6 complaint there is an e-mail to the Supervisor, which requires follow-up and  
7 coaching with the employee.

8 **Is Metric Used for the Purposes of Determining Executive (Director Level  
9 or Higher) Compensation Levels and/or Incentives?**

10 No, in 2023, Driver's Call Complaint Rate, was not used as a STIP metric.

11 **Is Metric Linked to the Determination of Individual or Group Performance  
12 Goals?**

13 No, Driver's Call Complaint Rate is not linked to 2023 individual or group  
14 performance goals for Director-level, or higher,.

1 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

2 No, Driver's Call Complaint Rate is not linked to 2023 individual  
3 performance goals for Director-level, or higher, positions.

4 **Bias Controls:** Data on driver check calls is provided by a third-party vendor.

5 **Rate Case Safety Goal Progress:** This metric was stated in the 2023 GRC as  
6 "Driver's Check Rate" and as track and trend only safety goal.<sup>97</sup> The name has  
7 since been updated to Driver's Call Complaint Rate.

8 **Monthly Data:** See Attachment A at the end of this report.

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<sup>97</sup> PG&E 2023 GRC Exhibit (PG&E-7), Chapter 1, Safety and Health, p. 1-24.

1 **Metric 25: Wires-Down not resulting in Automatic De-energization**

2 **Metric Name and Description:** Wires-Down not resulting in Automatic  
3 De-energization – This metric is defined as the number of occurrences of wire  
4 down events in the past calendar year that did not result in automatic (i.e., not  
5 manually activated) de-energization by circuit protection devices such as fuses,  
6 circuit breakers, and reclosers, etc. on all portions of a downed conductor that  
7 rest on the ground. This metric does not consider possible energization due to  
8 induced voltages from magnetic coupling of parallel circuits. Metric excludes  
9 secondary conductors and service drops. The metric is reported as  
10 a percentage of all wires down events in the past calendar year. Separate  
11 metrics are provided for transmission and distribution systems.

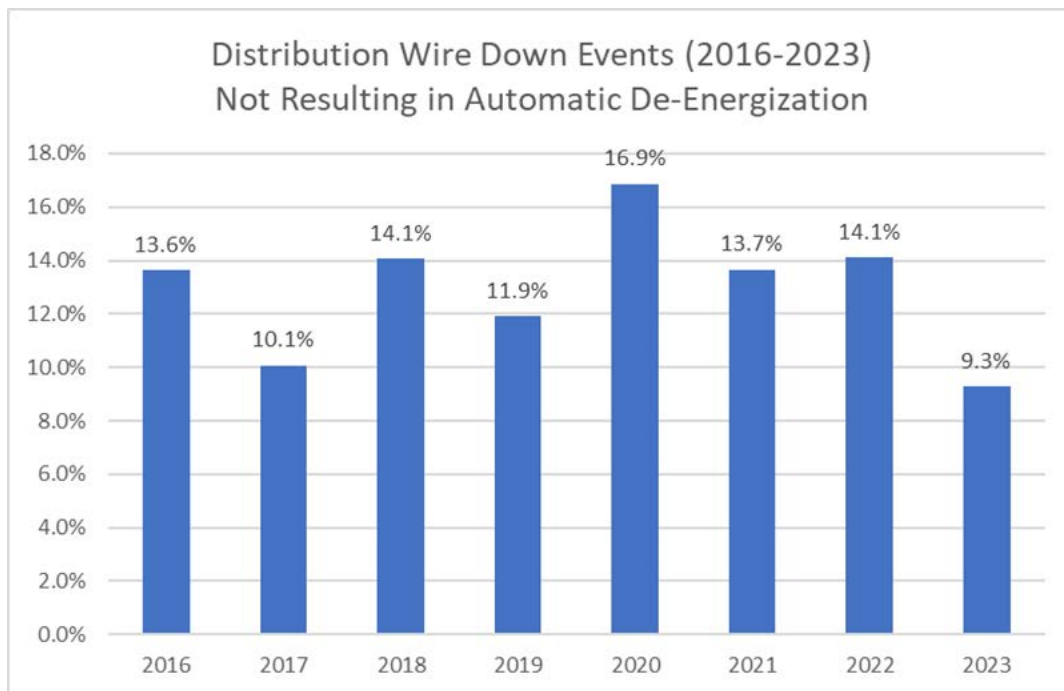
12 **Risks:** Electric Overhead, Wildfire

13 **Category:** Electric

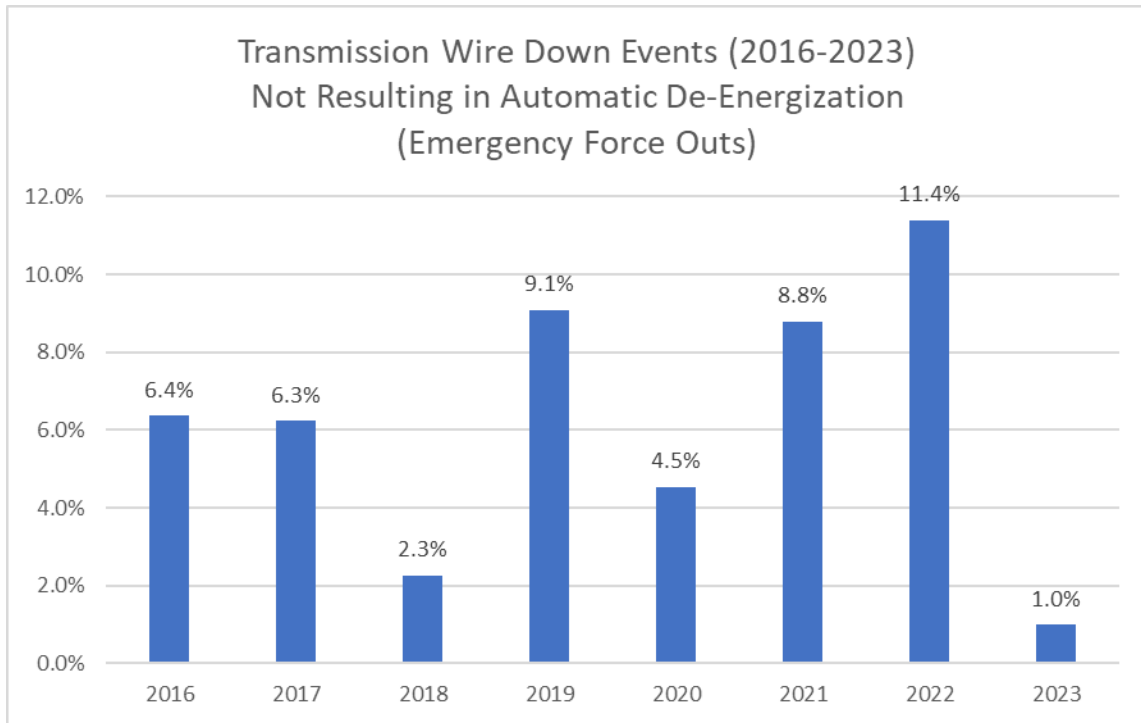
14 **Units:** Percentage of wires down occurrences

15 **Summary:**

**FIGURE 5-25A**  
**DISTRIBUTION WIRES-DOWN NOT RESULTING IN AUTOMATIC DE-ENERGIZATION (ANNUAL)**



**FIGURE 5-25B  
TRANSMISSION WIRES-DOWN NOT RESULTING IN AUTOMATIC DE-ENERGIZATION  
(ANNUAL)**



Note: The data in these figures are subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

1       **Narrative Context:** PG&E updated its outage reporting tools in 2015 to allow  
 2       for reporting when a distribution or transmission wire down event was noted by  
 3       field personnel as being energized upon arrival and as such, 2016 was the first  
 4       full year when this detail was reported in its outage data base. As can be seen  
 5       in Figure 5-25A, the distribution percentage value has ranged from 9.3 percent  
 6       in 2023 to 16.9 percent in 2020 with an eight-year average of 13.0 percent,  
 7       whereas the Transmission percentage value ranged from 1.0 percent in 2023 to  
 8       11.4 percent in 2022 with an eight -year average of 6.2 percent (Figure 5-25-B).  
 9       While PG&E has not tracked this specific metric in the past, for safety reasons,  
 10       field personnel generally treat wire down events as energized if unknown and  
 11       these percentages above represent the information reported as actually being  
 12       energized.

1 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
2 **or Higher) Compensation Levels and/or Incentives?**

3 No, in 2023, Wires-Down not resulting in Automatic De-energization, was  
4 not used as a STIP.

5 **Is Metric Linked to the Determination of Individual or Group Performance**  
6 **Goals?**

7 No, Wires-Down not resulting in Automatic De-energization is not linked to  
8 2023 individual or group performance goals for Director-level, or higher,  
9 positions.

10 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

11 No, Wires-Down not resulting in Automatic De-energization is not linked to  
12 2023 individual performance goals for Director-level, or higher, positions.

13 **Bias Controls:** The wires down events are reported by field and control center  
14 personnel per uniform reporting guidelines as the events occur.

- 15 • Engineers conduct post wire down event reviews (typically for the non-MED  
16 events) and will initiate corrections to the data via the outage quality team to  
17 ensure the reporting guidelines were followed and the records align with  
18 information reported by repair crews.
- 19 • The outage quality team processes all valid change requests received and  
20 also initiates corrections based on their reviews and findings of the collected  
21 outage information.

22 **Rate Case Safety Goal Progress:** This metric is not a 2023 GRC or 2020  
23 RAMP stated safety goal.

24 Significant work was performed to reduce wires down, including replacing  
25 overhead conductor, vegetation clearing, hardening of distribution circuits,  
26 infrared inspections of overhead lines to identify and repair hot spots,  
27 investigating wires down incidents, and implementing learnings/corrective  
28 actions.

29 **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 26: Missed Inspections and Patrols for Electric Circuits**

2 **Metric Name and Description:** Missed Inspections and Patrols for Electric  
3 Circuits – Metrics are calculated as annual number of overhead electric  
4 structures that did not comply with the inspection frequency requirements  
5 divided by total number of overhead electric structures with inspections due in  
6 the past calendar year. Separate metrics are provided for patrols, detailed  
7 inspections. Separate metrics are provided for primary distribution and  
8 transmission overhead circuits. “Minimum patrol frequency” refers to the  
9 frequency of patrols as specified in General Order (GO) 165. “Structures” refers  
10 to electric assets such as transformers, switching protective devices, capacitors,  
11 lines, poles, etc.

12 **Risks:** Electric Overhead, wildfire<sup>98</sup>

13 **Category:** Electric

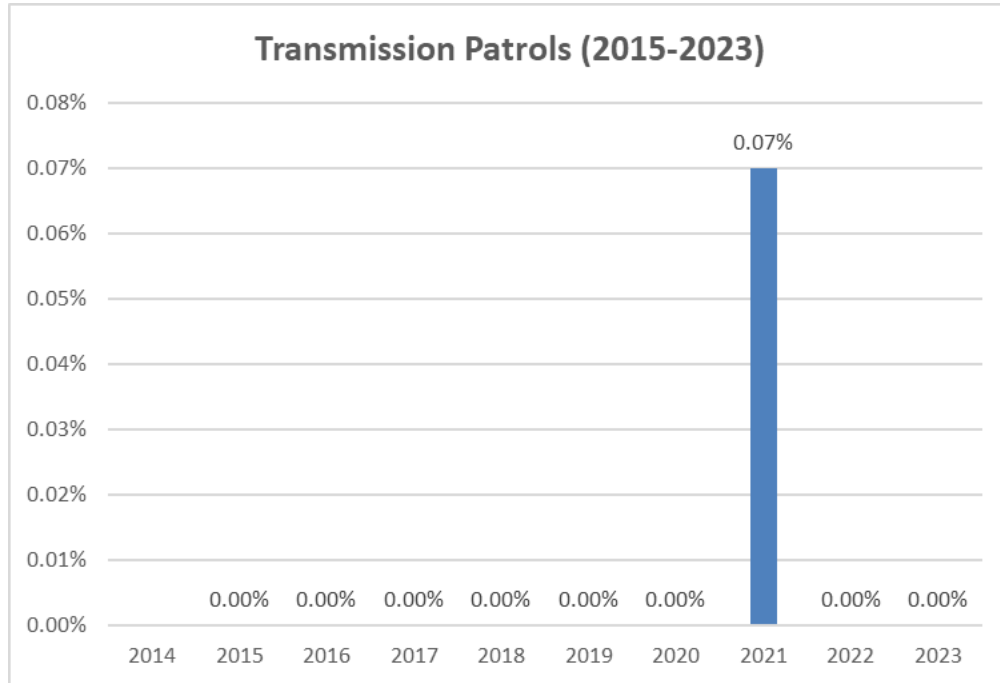
14 **Units:** percentage of structures that missed inspection relative to total required  
15 structures.

16 **Summary:**

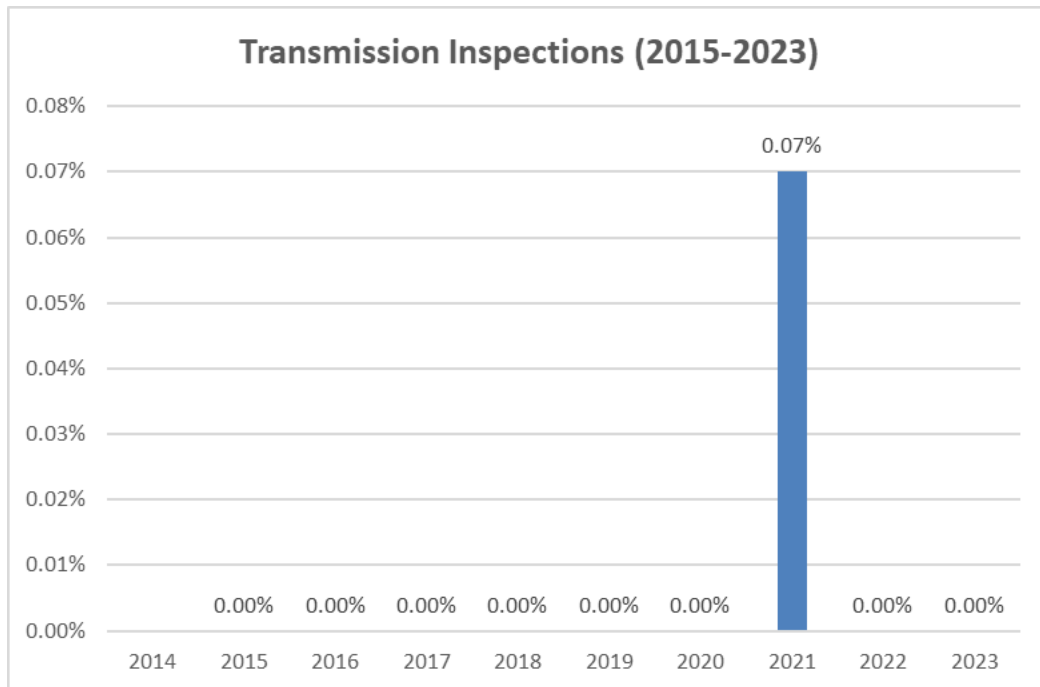
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<sup>98</sup> The Corporate Risk Register now has the following risks: (1) Wildfire, (2) Electric Transmission System-Wide Blackout, (3) Failure of Electric Distribution Overhead Assets, (4) Failure of Electric Distribution Underground Assets (5) Failure of Electric Transmission Overhead Assets, (6) Failure of Electric Distribution Substation Assets, (7) Failure of Electric Transmission Underground Assets (8) Failure of Electric Transmission Substation Assets, (9) Failure of Electric Distribution Network Assets, (10) Emergency Preparedness and Response

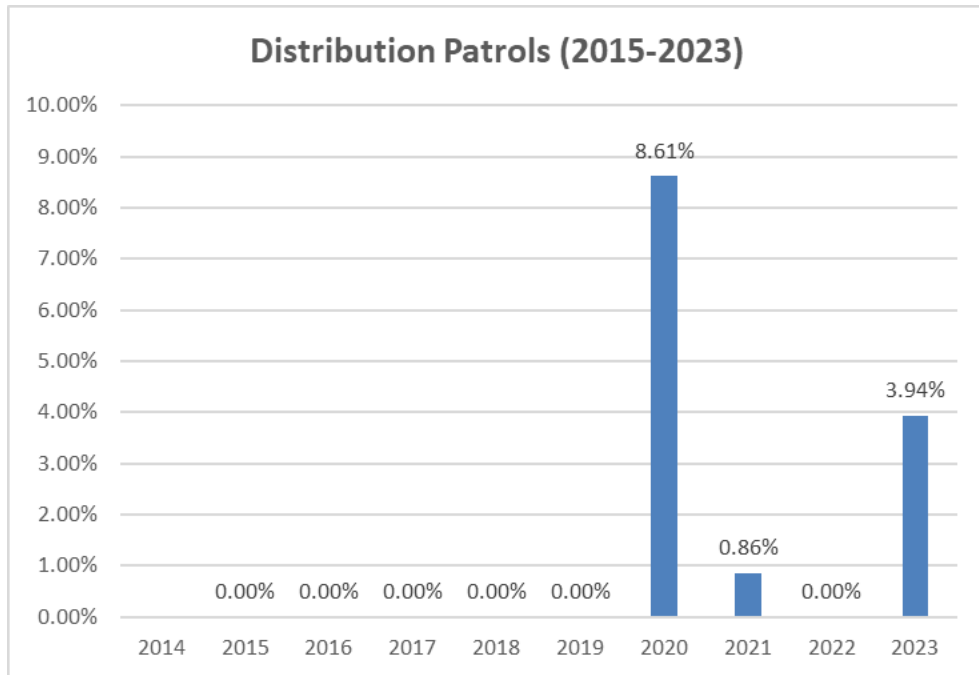
**FIGURE 5-26A  
MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS (ANNUAL)  
(TRANSMISSION PATROLS)**



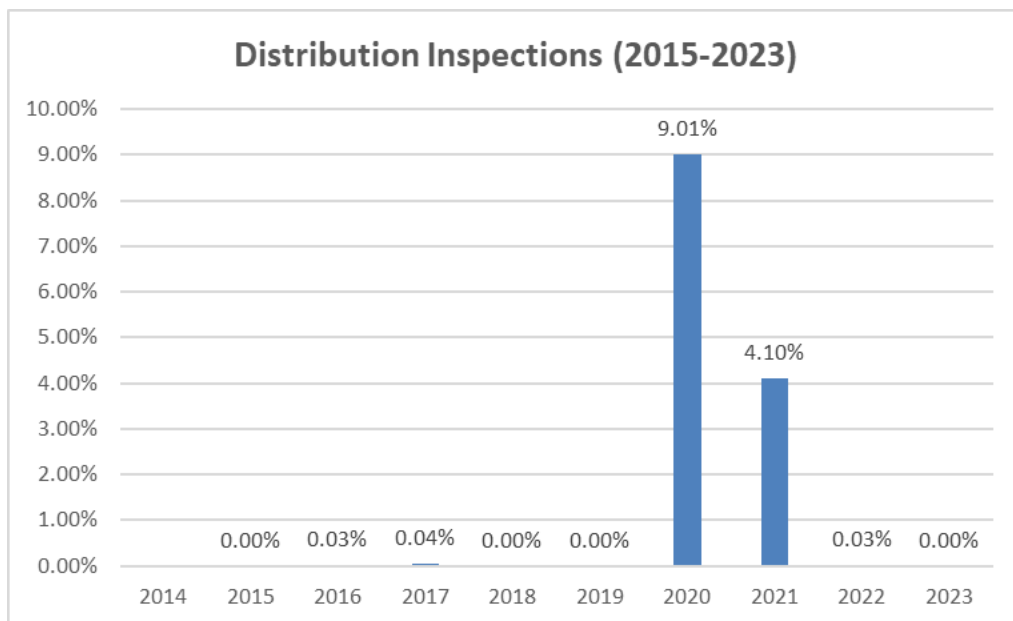
**FIGURE 5-26B  
MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS (ANNUAL)  
(TRANSMISSION INSPECTIONS)**



**FIGURE 5-26C  
MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS (ANNUAL)  
(DISTRIBUTION PATROLS)**



**FIGURE 5-26D  
MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS (ANNUAL)  
(DISTRIBUTION INSPECTIONS)**





1 **Narrative Context:**

2 Distribution Patrols and Inspections

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

5 Starting in 2015 and through 2019, we implemented the new GO 165  
6 requirement to complete patrols and inspections each year within a prescribed  
7 timeframe, based on the date of the last patrol or inspection. Our interpretation  
8 and implementation of this new language calculated the due date for each patrol  
9 or inspection each year as follows:

10 The California Public Utilities Commission (CPUC) twelve plus three (12+3)  
11 month Patrol and Inspection requirement defines:

- 12 • The due date for each “plat map” is based on the date the map was last  
13 inspected or patrolled.
- 14 • Inspections or patrols (of the facilities on a map) may not exceed 3  
15 additional months past the previous inspection or patrol date of that facilities  
16 on that map (maximum 15 months).
- 17 • Inspections or patrols may be performed before the due date.
- 18 • Inspections or patrols are performed by the end of the calendar year (12/31).
- 19 • The start of an inspection or a patrol starts a new inspection or patrol  
20 interval that must be completed within the prescribed timeframe.

21 For the years 2020 and 2021, we pivoted away from the “12+3” due date for  
22 completing patrols and inspections (of the facilities on a map), and instead  
23 directed our inspection program towards accelerating inspections for all  
24 inspectable electric facilities in the High Fire Threat Districts (HFTD) to be  
25 completed in first half of year and Non-HFTD inspections for second half of year.  
26 As a result, we completed patrols and inspections by “static” due dates of 8/31  
27 for HFTD areas, and 12/31 for Non-HFTD areas.

28 In 2023, PG&E completed 555,194 Distribution Patrols out of which 21,853  
29 were completed late leading to 3.94 percent patrols being completed late. PG&E  
30 also completed 230,502 Distribution inspections out of which 10 were completed  
31 late leading to 0 percent inspections being completed late.

## Transmission Patrols and Inspections

Patrols involve simple visual observations to identify obvious nonconformances. 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 remain circuit-based. 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).

The overhead transmission detailed inspection program has undergone significant evolution over the reporting period for the metric. 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 overhead transmission inspections: 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 overhead 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, annually for Tier 3 and on a 3-year cycle for Tier 2, compared to a 5-year cycle for non-HFTD. The 2020 inspections also included non-HFTD structures in PG&E-designated High Fire Risk Areas (HFRA), which were treated like Tier 2. The inspection program in 2021 continued using the HFTD-based cycles introduced in 2020 and imposed an in-year deadline for HFTD and HFRA inspections of 7/31, which PG&E committed to in the 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

1 June 2021 to ensure that all assets requiring an inspection under their  
2 prescribed cycles were included in the plan, including assets that were newly  
3 added to the asset registry. The 2022 inspection scope introduced the use of  
4 wildfire risk and consequence scores at the structure level to inform the selection  
5 of assets to be inspected.

6 Data provided for 2015-2019 reflects systemwide performance.  
7 HFTD-specific performance is not available prior to 2020. The HFTD data for  
8 patrols and inspections was tracked in SAP starting in 2020.

9 In 2023, PG&E completed 44,981 Transmission Patrols out of which  
10 0 structures fell below the minimum inspection frequency requirements leading  
11 to 0 percent patrols being completed late. PG&E also completed 54,717  
12 Transmission inspections out of which 0 structures fell below the minimum  
13 inspection frequency requirements leading to 0 percent inspections being  
14 completed late.

15 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
16 **or Higher) Compensation Levels and/or Incentives?**

17 No, in 2023, Missed Inspections and Patrols for Electric Circuits, was not  
18 used as a STIP metric.

19 **Is Metric Linked to the Determination of Individual or Group Performance**  
20 **Goals?**

21 No, Missed Inspections and Patrols for Electric Circuits, is not linked to 2023  
22 individual or group performance goals for Director-level, or higher, positions.

23 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

24 No, Missed Inspections and Patrols for Electric Circuits is not linked to 2023  
25 individual performance goals for Director-level, or higher, positions.

26 **Bias Controls:** Tracking spreadsheet at the division level for each of the  
27 18 distribution compliance offices, with all maintenance plans that are due for  
28 the year – including the following:

- 29 • Patrols: Date of last patrol, with calculated CPUC due date;  
30 • Inspections: Date of last inspection, with calculated CPUC due date;

- 1 • As work is completed, entries are made into the spreadsheet including the  
2 date that the work was started and completed, Inspector Name and LAN ID,  
3 etc.; and
- 4 • Tracking column indicating if the work was completed <= the CPUC due  
5 date.

6 Division spreadsheets are merged into a master file every week, with the  
7 following tracking mechanisms:

- 8 • “At Risk” report, which provides the work that is coming due in the next  
9 2 weeks & 6 weeks, for visibility;
- 10 • Summary report, by Division, showing volume of facilities that were  
11 completed on time or late;
- 12 • Recurring calls with Area Managers and Supervisor, to review the “At Risk”  
13 report to ensure visibility of upcoming due dates, understanding of any late  
14 units; and
- 15 • For late units, centralized tracking of all late units within the System  
16 Inspections “data response” team, including reason for work being complete  
17 late, remediation efforts needed, etc.

18 Supervisors have visibility in to CPUC due dates, are required to dispatch  
19 work to Inspectors in time to meet dates. Inspectors see CPUC due dates on  
20 paper map package and in the Inspect application, so that they can prioritize and  
21 ensure they complete the work by the due date. Due date requirements are  
22 covered during Inspector training courses. Contract resources have visibility into  
23 due dates, expectation is that they complete all assigned work by due dates.

24 “Engage” application – scheduling tool for Supervisor to assign OH  
25 inspections, includes the due date for each maintenance plan, so that  
26 supervisors have visibility and can ensure they are dispatching work in time to  
27 meet the CPUC due date. Daily “Attainment Report” for OH inspections  
28 completed in the Inspect application, which includes “asset required date”  
29 (CPUC due date and/or WMP date, whichever date is sooner) and completion  
30 date.

31 Various monthly reporting and metrics showing volume of patrols and  
32 inspections completed on time or late.

33 IA performed a validation of the 2023 metric performance.

1       **Rate Case Safety Goal Progress:** The Missed Inspections and Patrols metric is  
2 related to PG&E’s commitment to perform its Detailed Electric Distribution and  
3 Transmission Inspections in Compliance with its WMP, but also with GO 165.  
4 Significant work was performed to ensure electric facilities were inspected within  
5 their respective compliance timelines, but to ensure the inspections were  
6 effective in identifying non-conformances that required urgent repairs to  
7 mitigation for the potential of catastrophic wildfires. Furthermore, additional  
8 planning controls were developed to ensure all inspectable facilities are in a  
9 planned inspection cycle to avoid inspections being missed. See the 2023 GRC  
10 (A.21.06.021) Exhibit 4 Chapter 10 for a complete description of PG&E’s  
11 inspection programs and improvements for years 2023-2026.

12       **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 27: Overhead Conductor Size in High Fire Threat District, Tiers 2**  
2 **and 3, (HFTD)**

3 **Metric Name and Description:** Overhead Conductor Size in High Fire Threat  
4 District, Tiers 2 and 3, HFTD – percentage of primary distribution overhead  
5 conductors in Tiers 2 and 3 HFTD that is #6 copper (6Cu). Secondary  
6 conductors are excluded.

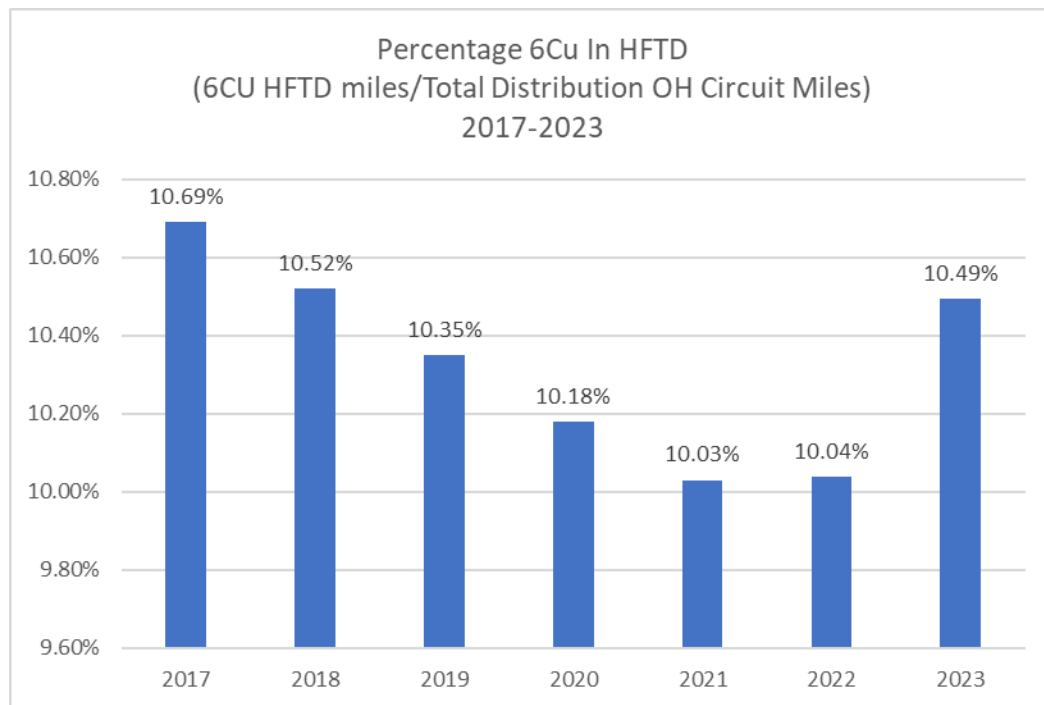
7 **Risks:** Electric Overhead, Wildfire

8 **Category:** Electric

9 **Units:** Percentage relative to total circuit miles

10 **Summary:**

**FIGURE 5-27**  
**OVERHEAD CONDUCTOR SIZE IN HIGH FIRE THREAT DISTRICT, TIERS 2 AND 3, (HFTD)**  
**(ANNUAL)**



11 **Narrative Context:** Pacific Gas and Electric Company’s (PG&E) system of  
12 record for our electric distribution facilities is Electric Distribution Geographic  
13 Information System (EDGIS). The EDGIS data points above show a reduction  
14 of 6Cu over time within PG&E’s distribution system. PG&E has eliminated the  
15 use of 6Cu in new construction, however it is still used in cases of maintenance  
16 and emergency work.

1 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
2 **or Higher) Compensation Levels and/or Incentives?**

3 No, in 2023, Overhead Conductor Size in High Fire Threat District, Tiers 2  
4 and 3, (HFTD) was not used as a STIP metric.

5 **Is Metric Linked to the Determination of Individual or Group Performance**  
6 **Goals?**

7 No, Overhead Conductor Size in High Fire Threat District, Tiers 2 and 3,  
8 (HFTD) is not linked to 2023 individual or group performance goals for  
9 Director-level, or higher, positions.

10 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

11 No, Overhead Conductor Size in High Fire Threat District, Tiers 2 and 3,  
12 (HFTD) is not linked to 2023 individual performance goals for Director-level, or  
13 higher, positions.

14 **Bias Controls:** There are currently no bias controls in place for measuring the  
15 amount of 6Cu in our system. There are a total of approximately 25,060  
16 Distribution overhead circuit miles located in the Tier 2 and Tier 3 HFTD areas.  
17 PG&E's data bases reflect the circuit miles that currently exist and do not  
18 maintain the historical values specifically in the Tier 2/3 areas. As such, PG&E  
19 has assumed these values have remained the same for all years from 2013  
20 through 2022 and assuming annual variances due to the circuit miles are very  
21 small. Beginning with 2023 performance, PG&E will report the nominally  
22 updated circuit mileage total annually.

23 **Rate Case Safety Goal Progress:** PG&E does not focus on this metric;  
24 therefore, it is not used to track safety performance. There is no safety goal  
25 associated with the amount of 6Cu in the 2023 GRC.

26 **Monthly Data:** See Attachment A at the end of this report. EDGIS system  
27 capabilities only have annual data snapshots as far back as 2017 and we  
28 currently do not have the ability to display the results in a monthly manner.

1       **Metric 28: Gas Operation Corrective Actions Backlog**

2       **Metric Name and Description:** Gas Operation (GO) Corrective Actions  
3       Backlog – Total number of overdue work orders generated to correct 49 Code of  
4       Federal Regulations (CFR) Part 192 non-compliances or infractions Notices of  
5       Violation that exceeded the maximum allowable/allotted time frame to complete  
6       the work order in the past calendar year divided by the total number of closed or  
7       still-open non-compliance or infraction Notices of Violation-related work orders in  
8       past calendar year, evaluated at the end of the year. Maximum  
9       allowable/allotted time is based on either applicable requirement in 49 CFR  
10      Part 192, or the utility’s internal standards. Separate metrics are provided for  
11     gas distribution (GD) and gas transmission (GT).

12     **Risks:** Loss of Containment (LoC) on Gas Transmission Pipeline; LoC on Gas  
13     Distribution Main or Service<sup>99</sup>

14     **Category:** Gas

15     **Units:** Percentage of work orders past due for completion in the past calendar  
16     year

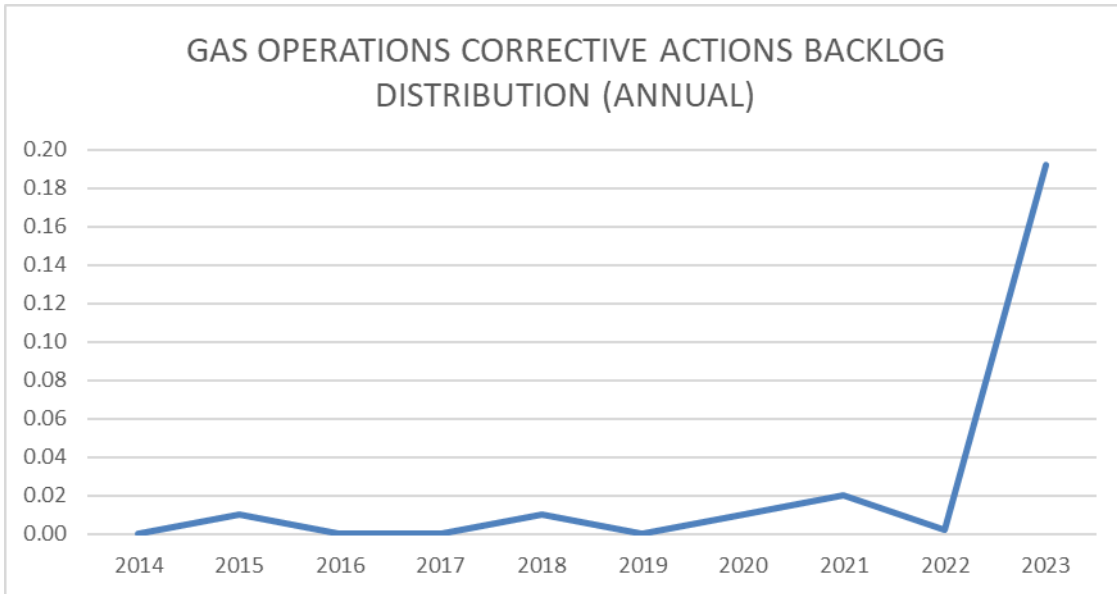
17     **Summary:**

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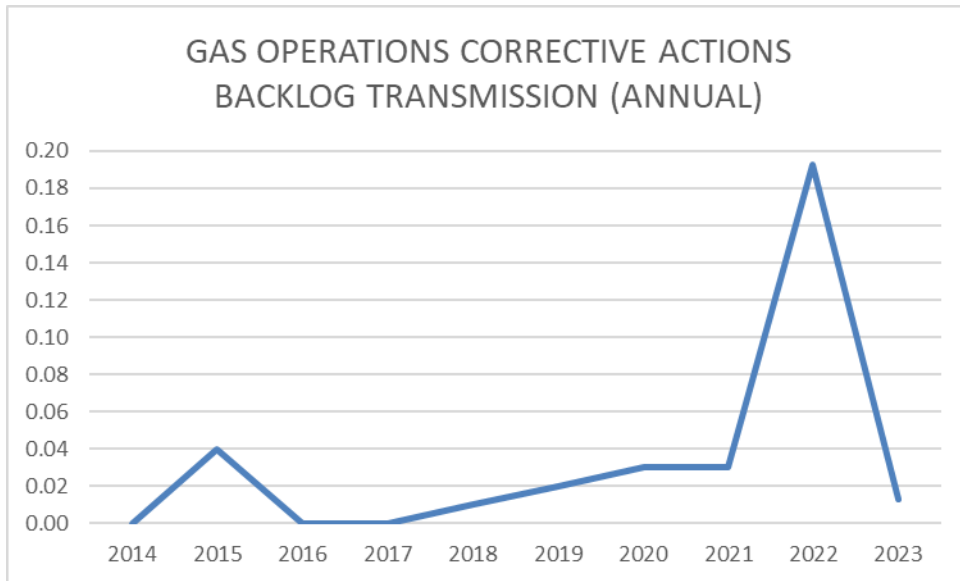
<sup>99</sup> The Corporate Risk Register now has the following risks: LoC on Gas Transmission Pipeline; LoC on Gas Distribution Main or Service.



**FIGURE 5-28A**  
**GAS OPERATIONS CORRECTIVE ACTIONS BACKLOG DISTRIBUTION (ANNUAL)**



**FIGURE 5-28B**  
**GAS OPERATIONS CORRECTIVE ACTIONS BACKLOG TRANSMISSION (ANNUAL)**



1 **Narrative Context:**

2 These metrics measure overdue corrective work orders (leveraging timeframes  
3 outlined in 49 CFR Part 192) as a percentage of total corrective workorders in a  
4 given calendar year. PG&E includes actions resulting from low cathodic  
5 protection reads and atmospheric corrosion remediation of bad coating or wrap  
6 at the air to soil interface in the calculation of this metric.

7 In 2023, Gas Distribution Corrective Action Backlog is 0.19. From  
8 2013-2022, there has been an 80 percent decrease in GO Corrective Backlog  
9 for Gas Distribution because of a self-report with 2,509 instances where there  
10 was delay on remediating atmospheric corrosion on meter sets and risers due to  
11 "Can't Get In" situations. In 2023, Gas Transmission Corrective Action Backlog  
12 was 0.01 which is a significant decrease compared to the data for the past  
13 4 years.

14 **Is Metric Used for the Purposes of Determining Executive (Director Level  
15 or Higher) Compensation Levels and/or Incentives?**

16 No, in 2023, GO Corrective Actions Backlog was not used as a STIP metric.

17 **Is Metric Linked to the Determination of Individual or Group Performance  
18 Goals?**

19 Yes, GO Corrective Actions Backlog is linked to 2023 individual or group  
20 performance goals for one or more Director-level, or higher, position.

21 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

22 Yes, in 2023, the following position(s) include individual performance goals  
23 that are linked to GO Corrective Actions Backlog.

- 24 • **Director:** Gas Engineering (7), Gas Operations (1)
- 25 • **Senior Director:** Gas Operations (1)

26 **Bias Controls:** Work orders are generated in our system of record and  
27 assigned due dates per guidance in 49 CFR Part 192. Overdue items are  
28 tracked by our compliance team and issued via a "self-report" to the CPUC. The  
29 data is tracked through monthly attainment reporting for different asset types.

30 **Rate Case Safety Goal Progress:** This safety metric is not related to a safety  
31 goal described in the 2023 General Rate Case.

1 **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 29: GO-95 Corrective Actions (Tiers 2 and 3, HFTD)**

2 **Metric Name and Description:** General Order (GO)-95 Corrective Actions  
3 (Tiers 2 and 3, High Fire Threat District (HFTD)) – The number of Priority Level  
4 2 notifications that were completed on time divided by the total number of  
5 Priority Level 2 notifications that were due in the calendar year in Tiers 2 and 3,  
6 HFTD. Consistent with GO 95 Rule 18 provisions, the proposed metric should  
7 exclude notifications that qualify for extensions under reasonable circumstances.  
8 Separate metrics are provided for distribution and transmission systems.

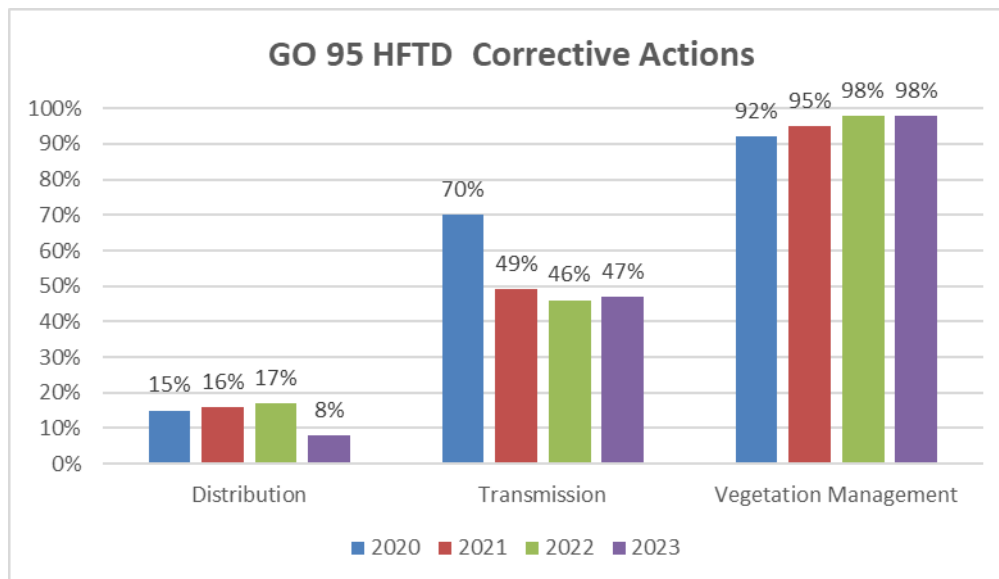
9 **Risks:** Electric safety and wildfire<sup>100</sup>

10 **Category:** Electric

11 **Units:** Percentage of corrective actions completed on time

12 **Summary:**

**FIGURE 5-29**  
**GO-95 CORRECTIVE ACTIONS (TIERS 2 AND 3, HFTD) (ANNUAL)**



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<sup>100</sup> The Corporate Risk Register now has the following risks: (1) Wildfire, (2) Electric Transmission System-Wide Blackout, (3) Failure of Electric Distribution Overhead Assets, (4) Failure of Electric Distribution Underground Assets (5) Failure of Electric Transmission Overhead Assets, (6) Failure of Electric Distribution Substation Assets, (7) Failure of Electric Transmission Underground Assets (8) Failure of Electric Transmission Substation Assets, (9) Failure of Electric Distribution Network Assets, (10) Emergency Preparedness and Response.

1 **Narrative Context:** The GO 95 Corrective Actions in HFTD metric measures  
2 the number of Priority Level 2 corrective notifications (tags) in HFTD that are  
3 completed in accordance with the GO 95 Rule 18 timelines.

4 This metric is associated with our Failure of Electric Distribution Overhead  
5 Asset Risk and Wildfire Risk, which are part of our 2020 Risk Assessment and  
6 Mitigation Phase Report filing.

7 The metric performance comprises an aggregated performance in electric  
8 distribution, transmission, and vegetation management. Metric performance is  
9 further discussed in the Safety & Operational Metric Report, Chapter 3-11.

10 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
11 **or Higher) Compensation Levels and/or Incentives?**

12 No, in 2023, GO-95 Corrective Actions (Tiers 2 and 3, HFTD) was not used  
13 as a STIP metric.

14 **Is Metric Linked to the Determination of Individual or Group Performance**  
15 **Goals?**

16 Yes, GO-95 Corrective Actions (Tiers 2 and 3, HFTD) is linked to 2023  
17 individual or group performance goals for one or more Director-level, or higher,  
18 position.

19 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

20 Yes, in 2023, the following position(s) include individual performance goals  
21 that are linked to GO-95 Corrective Actions (Tiers 2 and 3, HFTD):

- 22 • **Director:** Customer and Communications (1), Electrical Engineering (1)  
23 Electric Operations (8)
- 24 • **Senior Director:** Electric Engineering (2), Electric Operations (5);  
25 Operations (1)
- 26 • **Senior Vice President:** Electric Engineering (1)

27 **Bias Controls:**

- 28 • **Transmission:** Once a notification is released to Line Corrective  
29 notifications, the Centralized Inspection Review Team (CIRT) is the only  
30 group that can edit the priority, fire tier, and scope of work (via Facility  
31 Damage Action (FDA)/ Work Type Code (WTC)), due date, and other fields.  
32 Changes are controlled by adding the user status code PRTO status, which

1 severely limits the editable fields to anyone outside of CIRT. CIRT adds this  
2 status to all notifications that are reviewed.

- 3 • **Distribution:** Once a notification is entered into SAP, it is released for  
4 review in the gatekeeper screen, which has SAP controls built into it based  
5 on the FDA table that has the various FDAs (facility/damage/action), WTC  
6 (work type codes), tag priority, duration/due date, etc. The tags info  
7 (pictures, map, comments) are reviewed by the gatekeepers in CIRT and  
8 confirmed as EC. Once a tag is converted to an EC, edit functions to certain  
9 fields are limited to the compliance group.
- 10 • Internal Audit performed a validation of the 2023 metric performance.

11 **Rate Case Safety Goal Progress:** This metric is not a 2023 General Rate  
12 Case (GRC) stated safety goal but in the 2023 GRC the California Public Utilities  
13 Commission (Commission) established a new two-way balancing account to  
14 track work associated with overhead and Underground Electric Distribution  
15 Maintenance associated with tags resulting from inspections and other reporting.  
16 The Commission states in the 2023 GRC Decision (D.23-11-069) that:

17 *A balancing account will protect ratepayers from paying the cost of*  
18 *untracked deferred work and allow PG&E the flexibility to perform the work it*  
19 *can cost-effectively perform. In this balancing account, PG&E shall*  
20 *separately account for any additional costs associated with difficult to*  
21 *access or remote areas.<sup>101</sup>*

22 PG&E continues to focus its GO 95 Corrective Actions in HFTDs with a  
23 risk-informed prioritization of its work plans. PG&E's strategy focuses on  
24 reducing wildfire risk associated with open corrective notifications while  
25 deploying safety controls to manage the lower risk Level 2 Priority "E" corrective  
26 notifications. This approach allows strategic and targeted wildfire risk reductions  
27 to remain our primary focus.

28 See 2023 GRC (A.21.06.021) Exhibit 4 Chapter 11 for a detailed description  
29 of PG&E's Electric Distribution Overhead and Underground Maintenance  
30 program for PG&E's approach to GO-95 Corrective Actions.

31 **Monthly Data:** See Attachment A at the end of this report.

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<sup>101</sup> See D.23-11-069 page 353 and Ordering Paragraph 117.

1 **Metric 30: Gas Overpressure Events**

2 **Metric Name and Description:** Gas Overpressure Events - CPUC-reportable  
3 overpressure events are those that met the conditions specified in  
4 General Order 112-F, 122.2(d)(5) but are reported on the same frequency as the  
5 other Safety Performance Metrics. Separate metrics are provided for distribution  
6 and transmission systems. This metric measures both gas operational  
7 performance and the integrity of gas pipelines.

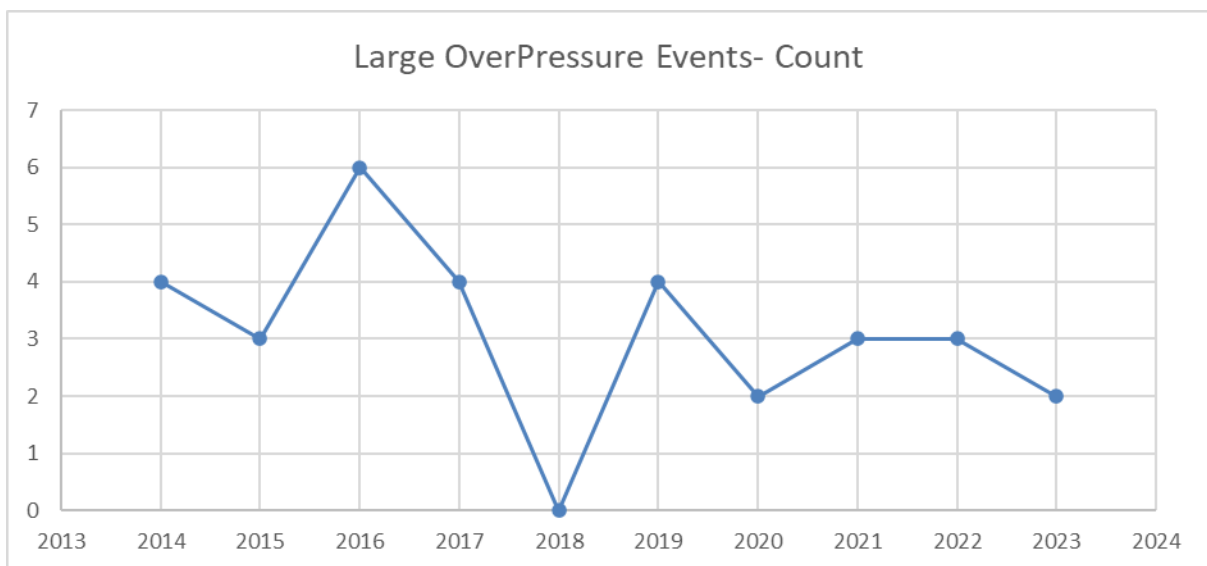
8 **Risks:** Large Overpressure Event Downstream of Gas Measurement and  
9 Control Facility; Loss of Containment (LoC) at Gas Measurement and Control or  
10 Compression and Processing Facility<sup>102</sup>

11 **Category:** Gas

12 **Units:** Number of occurrences

13 **Summary:**

**FIGURE 5-30  
GAS OVERPRESSURE EVENTS (ANNUAL)**



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<sup>102</sup> The Corporate Risk Register now has the following risks: Large Overpressure Event Downstream of Gas Measurement and Control Facility; LoC at Gas Measurement and Control or Compression and Processing Facility.

1 **Narrative Context:** A large Overpressure event is defined as any verified  
2 pressure reading that exceeds the design limits set forth in the Code of Federal  
3 Regulations (CFR) – 49 CFR 192.201. This metric tracks the occurrence of  
4 Overpressure events, which includes:

5 1. High pressure Gas Distribution

- 6 a. (Maximum Allowable Operating Pressure (MAOP) 1 pound per square  
7 inch gauge (psig) to 12 psig) greater than 50 percent above MAOP  
8 b. (MAOP 12 psig to 60 psig) greater than 6 psig

9 2. Gas Transmission pipelines greater than 10 percent above MAOP (or the  
10 pressure produces a hoop stress of  $\geq 75$  percent Specified Minimum Yield  
11 Strength, whichever is lower)

12 Overpressure events on low pressure systems are excluded from this metric  
13 because they are not defined in federal code 49 CFR 192.201. In the past  
14 10 years, the number of Overpressure events range between 5 to 11 with  
15 5 occurrences in 2023. PG&E continues to review operations and look for  
16 opportunities to perform work to further reduce OP events and contribute to  
17 system safety.

18 PG&E has identified human performance and equipment failure as the two  
19 most common causes for Overpressure events. Actions to eliminate  
20 Overpressure events were implemented, including station design and  
21 construction best practices; lock-out/tag-out process improvements; and  
22 distribution of information around associated Overpressure risk factors through  
23 training and communication initiatives. PG&E has been installing Supervisory  
24 Control and Data Acquisition (SCADA) points in the past years to increase  
25 system real-time visibility in the Gas Control Center which could provide better  
26 detection capabilities and allow more Overpressure events to be identified and  
27 recorded. PG&E also began installing sulfur filters on pilot-operated equipment  
28 in 2018. Large Volume Customer primary regulation sets also received  
29 accelerated inspections in 2018.

30 PG&E continues to review operations and look for opportunities to perform  
31 work to further limit potential MAOP exceedances. Each activity builds on the  
32 goal to eliminate large Overpressure events, thereby contributing to system  
33 safety and reliability.



1 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
2 **or Higher) Compensation Levels and/or Incentives?**

3 No, in 2023, Gas Overpressure Events was not used as a STIP metric.

4 **Is Metric Linked to the Determination of Individual or Group Performance**  
5 **Goals?**

6 Yes, Gas Overpressure Events is linked to 2023 individual or group  
7 performance goals for two Director-level positions.

8 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

9 Yes, in 2023, the following position(s) include individual performance goals  
10 that are linked to Gas Overpressure Events.

- 11 • **Director:** Gas Engineering (1)
- 12 • Senior Director: Gas Operations (1)
- 13 • Senior Vice President: Gas Operations (1)

14 **Bias Controls:** PG&E has both an automated process and field process for  
15 logging Gas Overpressure events. For the automated process, SCADA system  
16 monitors equipment pressure and notifies potential issues to Gas Control  
17 through alarms. For the field process, field personnel are required to gauge  
18 pressure during maintenance and clearances, and report to Gas Control if an  
19 abnormal operating condition arises.

20 IA performed a validation of the 2023 metric performance.

- 21 1. Each Overpressure event is entered into our SAP Corrective Action Program  
22 (CAP) system of record to ensure retention of record history.
- 23 2. Each Overpressure event's datasets (location, CAP number, date, cause,  
24 corrective action, etc.) are reviewed by the Facility Integrity Management  
25 Program team to ensure accuracy and are logged in the Overpressure  
26 master list which is viewable by all PG&E employees.
- 27 3. Each Overpressure event is distributed to stakeholders by an electronic page  
28 (epage) and an email (Quick Hit), which is reviewed in the next Daily  
29 Operations Briefing with leadership.

1       **Rate Case Safety Goal Progress:** This metric supports a safety goal described  
2       in the 2023 General Rate Case (GRC) to utilize PG&E’s Overpressure  
3       Protection Enhancements Program to mitigate large overpressure events due to  
4       equipment-related failure at regulator stations.<sup>103</sup> However, it should be noted  
5       the 2023 GRC decision did not approve continued funding of this program for  
6       the 2023-2026 rate case period.<sup>104</sup>

7       **Monthly Data:** See Attachment A at the end of this report.

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<sup>103</sup> See 2023 GRC Exhibit (PG&E-3), pp. 6-60, line 4 to 6-60, line 2.

<sup>104</sup> See D.23-11-069, p. 139.

1 **Metric 31: Gas In-Line Inspections Missed**

2 **Metric Name and Description:** Gas In-Line Inspections Missed - The number  
3 of gas pipeline in-line inspections that missed the required reassessment  
4 interval, according to the relevant intervals established pursuant to 49 CFR,  
5 Part 192.

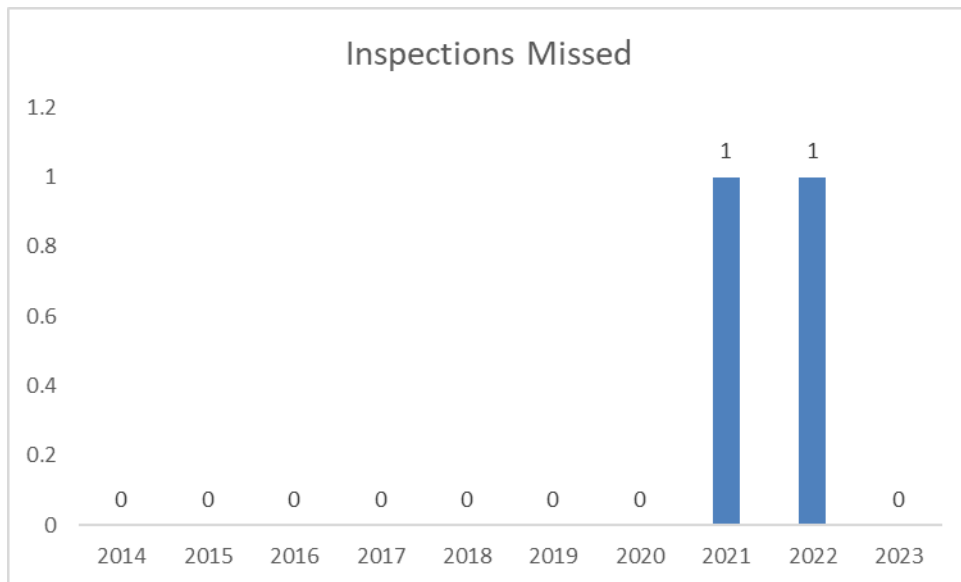
6 **Risks:** Loss of Containment (LoC) on Gas Transmission Pipeline<sup>105</sup>

7 **Category:** Gas

8 **Units:** Number of Missed Inspections

9 **Summary:**

**TABLE 5-31  
GAS IN-LINE INSPECTIONS MISSED**



10 **Narrative Context:** From 2014–2020, there were no instances of gas pipeline  
11 in-line inspections that missed the required reassessment interval, according to  
12 the relevant intervals established pursuant to 49 CFR, Part 192. However, in  
13 2021 and in 2022, PG&E recorded 1 instance of gas pipeline in-line inspection  
14 that missed the required reassessment interval. These missed inspections were  
15 due to potential customer reliability impacts and safety concerns related to

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<sup>105</sup> The Corporate Risk Register now has the following risks: LoC on Gas Transmission Pipeline

1 fatigue of the construction and operations personnel. In 2023, there were no  
2 instances of missed gas pipelines inspections.

3 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
4 **or Higher) Compensation Levels and/or Incentives?**

5 No, in 2023, Gas In-Line Inspections Missed was not used as a STIP metric.

6 **Is Metric Linked to the Determination of Individual or Group Performance**  
7 **Goals?**

8 No, Gas In-Line Inspections Missed is not linked to 2023 individual or group  
9 performance goals for Director-level, or higher, positions.

10 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

11 No, Gas In-Line Inspections Missed metric is not linked to 2023 individual  
12 performance goals for Director-level, or higher, positions.

13 **Bias Controls:** Missed gas in-line inspections identified through the corrective  
14 action program are reviewed as a non-conformance by the Gas Regulatory  
15 Compliance Department. Non-conformance results are then reported to the  
16 California Public Utilities Commission, as required.

17 **Rate Case Safety Goal Progress:** Non-compliance for missed ILI inspections  
18 is tied to a safety goal in the 2023 General Rate Case as it is a mandatory  
19 federal safety requirement PG&E is committed to meeting.

20 **Monthly Data:** See Attachment A at the end of this report.

1       **Metric 32: Overhead Conductor Safety Index**

2       **Metric Name and Description:** Overhead Conductor Safety Index – Overhead  
3       Conductor Safety Index is the sum of all annual occurrences on overhead  
4       transmission or primary voltage distribution conductors satisfying one or more of  
5       the following conditions divided by total circuit miles in the system x 1,000:

- 6       1) A conductor or splice becomes physically broken;
- 7       2) A conductor is dislodged from its intended design position due to either  
8       malfunction of its attachment points and/or supporting structures or contact  
9       with foreign objects (including vegetation);
- 10      3) A conductor falls from its intended position to rest on the ground or a foreign  
11      object;
- 12      4) A conductor comes into contact with communication circuits, guy wires, or  
13      conductors of a lower voltage; or
- 14      5) A power pole carrying normally energized conductors leans by more than  
15      45 degrees in any direction relative to the vertical reference when measured  
16      at ground level.

17       Separate metrics are reported for transmission and primary voltage distribution  
18       conductors. Secondary voltage conductors and service drops are not included  
19       in this metric.

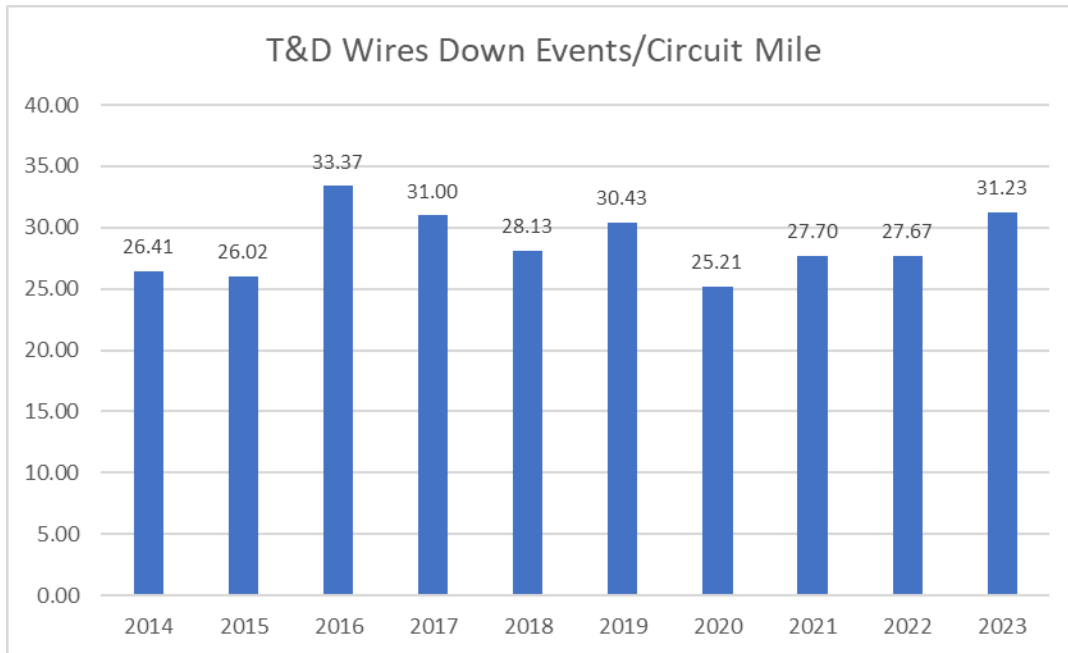
20       **Risks:** Wildfire, Transmission Overhead Conductor, Distribution Overhead  
21       Conductor Primary

22       **Category:** Electric

23       **Units:** Number of occurrences per 1,000 circuit miles

1 **Summary:**

**FIGURE 5-32<sup>106</sup>**  
**OVERHEAD CONDUCTOR SAFETY INDEX (ANNUAL)**



Note: The data in this figure is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

2 **Narrative Context:** PG&E does not currently have the ability to report out on  
3 this metric per the five subcomponents listed above, as we do not track  
4 conductor failures at that level of granularity. PG&E, along with the other CA  
5 IOUs, will report the Overhead Conductor Safety Index metric as a rate of our  
6 T&D wires down SPM metric 1 (excluding MEDs and secondary wires). The  
7 rate is calculated as the number of T&D wires down divided by total circuit miles  
8 times 1,000. PG&E's rate for 2023 was 31.23.

<sup>106</sup> Figure 5-32 performance has been corrected to align with the metric definition to multiply the number of miles in the denominator by 1,000. This impacts all years and previously submitted 2021 and 2022 reports.

1 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
2 **or Higher) Compensation Levels and/or Incentives?**

3 No, in 2023, Overhead Conductor Safety Index was not used as a STIP  
4 metric.

5 **Is Metric Linked to the Determination of Individual or Group Performance**  
6 **Goals?**

7 No, Overhead Conductor Safety Index is not linked to 2023 individual or  
8 group performance goals for Director-level, or higher, positions.

9 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

10 No, Overhead Conductor Safety Index is not linked to 2023 individual  
11 performance goals for Director-level, or higher, positions.

12 **Bias Controls:** The wires down events are reported by field and control center  
13 personnel per uniform reporting guidelines as the events occur.

- 14 • Engineers conduct post wire down event reviews (typically for the non-MED  
15 events) and will initiate corrections to the data via the outage quality team to  
16 ensure the reporting guidelines were followed and the records align with  
17 information reported by repair crews.
- 18 • The outage quality team processes all valid change requests received and  
19 also initiates corrections based on their reviews and findings of the collected  
20 outage information.

21 **Rate Case Safety Goal Progress:** This metric is not a 2023 General Rate  
22 Case or 2020 RAMP stated safety goal.

23 Significant work was performed to reduce wires down, including replacing  
24 overhead conductor, vegetation clearing, hardening of distribution circuits,  
25 infrared inspections of overhead lines to identify and repair hot spots,  
26 investigating wires down incidents, and implementing learnings/corrective  
27 actions.

28 **Monthly Data:** See Attachment A at the end of this report.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**ATTACHMENT A**  
**MONTHLY METRIC DATA TABLES**



**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 1**

**TRANSMISSION AND DISTRIBUTION (T&D) OVERHEAD WIRES DOWN - NON-MAJOR EVENT DAYS**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	168	301	246	193	178	181	193	189	163	221	181	398	2,612
2	2015	158	237	143	185	154	198	183	225	188	219	274	409	2,573
3	2016	430	184	511	270	225	211	224	178	213	343	219	292	3,300
4	2017	283	376	378	242	263	238	233	215	230	204	246	157	3,065
5	2018	216	174	370	231	209	231	272	204	167	213	208	287	2,782
6	2019	335	249	335	238	311	206	198	210	216	138	232	341	3,009
7	2020	159	172	245	228	235	213	196	240	192	180	237	196	2,493
8	2021	261	187	292	174	217	238	213	181	208	255	248	265	2,739
9	2022	276	149	189	274	212	255	196	171	195	142	252	425	2,736
10	2023	383	231	772	211	175	152	177	253	147	157	197	219	3,074

(a) PG&E has utilized its Integrated Logging Information System-Operations Data Base (ILIS-ODB) to provide the number of distribution outages that involved distribution wire down event conditions.

(b) Distribution wire down conditions during PPS events are not included in these totals since these typically occur when the lines are de-energized and are generally not the initiating cause of the reported outage event.

(c) PG&E's current definition for distribution wire down events are only related to sustained outages of its primary distribution system reported in its ILIS-ODB data base.

(d) Transmission wire down events were not tracked until 2012 and 2013 was the first year distribution wire down events were uniformly tracked.

(e) The data in this table is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 2**

**TRANSMISSION AND DISTRIBUTION (T&D) OVERHEAD WIRES DOWN - MAJOR EVENT DAYS**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	168	301	246	193	178	181	193	216	163	221	181	1,146	3,387
2	2015	158	714	143	189	154	211	215	225	188	225	274	580	3,276
3	2016	430	274	714	270	225	211	224	178	213	397	219	292	3,647
4	2017	1,947	1,402	378	468	263	253	233	215	325	486	246	256	6,472
5	2018	216	174	431	231	214	231	283	204	167	219	334	287	2,991
6	2019	880	1,786	335	238	311	229	198	219	232	283	524	341	5,576
7	2020	264	393	515	228	235	213	196	375	233	206	237	196	3,291
8	2021	1,471	187	292	174	217	238	224	222	224	775	248	1,547	5,819
9	2022	276	149	189	274	212	255	196	171	223	142	252	793	3,132
10	2023	2,166	1,627	1,679	211	175	152	177	253	160	157	197	219	7,173

- (a) PG&E has utilized its Integrated Logging Information System-Operations Data Base (ILIS-ODB) to provide the number of distribution outages that involved distribution wire down event conditions.
- (b) Distribution wire down conditions during PSPS events are not included in these totals since these typically occur when the lines are de-energized and are generally not the initiating cause of the reported outage event.
- (c) PG&E's current definition for distribution wire down events are only related to sustained outages of its primary distribution system reported in its ILIS-ODB data base.
- (d) Transmission wire down events were not tracked until 2012 and 2013 was the first year distribution wire down events were uniformly tracked.
- (e) The data in this table is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 3**

**ELECTRIC EMERGENCY RESPONSE TIME**

**"Average and median time in minutes to respond on-site"  
2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY	
1	2014	avg												35	
		med													31
2	2015	avg	39	65	32	34	33	42	41	37	34	43	37	33	39
		med	29	34	28	28	28	27	28	28	27	28	26	27	28
3	2016	avg	39	32	32	43	35	39	33	39	33	37	33	46	37
		med	27	26	27	28	26	28	28	28	28	27	29	28	28
4	2017	avg	42	46	40	46	41	35	33	33	40	32	31	40	40
		med	31	33	28	31	28	27	30	30	28	29	27	28	30
5	2018	avg	27	30	35	41	41	38	39	39	35	36	37	36	36
		med	25	27	26	28	28	27	29	27	28	28	28	30	28
6	2019	avg	31	46	31	37	33	35	25	31	31	32	37	32	41
		med	29	32	29	30	29	31	29	30	30	31	32	30	30
7	2020	avg	31	39	30	30	29	29	30	33	30	30	30	30	31
		med	29	31	29	29	28	27	30	30	31	29	29	29	29
8	2021	avg	36	30	30	29	29	29	29	31	30	35	32	34	32
		med	32	29	29	27	29	28	29	30	30	32	31	30	30
9	2022	avg	37	30	30	30	29	30	30	30	30	30	31	31	31
		med	30	30	30	30	30	30	30	30	30	30	30	30	30
10	2023	avg	34	34	37	36	35	34	34	33	33	32	32	32	32
		med	32	32	32	31	31	31	30	30	30	30	30	29	30

(a) PG&E began tracking monthly data in 2015

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 4**

**FIRE IGNITIONS**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	1	1	1	2	3	49	74	40	36	41	18	12	277
2	2015	4	13	13	24	36	97	78	71	62	41	15	11	465
3	2016	2	5	1	26	38	83	67	66	59	37	7		391
4	2017	9	3	7	19	44	99	110	80	69	102	23	19	584
5	2018	5	8	6	10	37	101	88	72	50	35	30	3	445
6	2019	4	5	3	18	41	83	73	63	69	81	35	6	481
7	2020	1	16	11	17	52	106	67	86	54	60	28	16	514
8	2021	43	12	18	33	74	95	64	46	33	49	9	5	481
9	2022	5	18	21	45	64	80	69	57	58	33	15	2	467
10	2023	8	17	4	19	24	54	77	61	47	32	27	8	378

(a) Metric includes all powerline-involved fire incidents annually reportable to the CPUC per Decision 14-02-015 and within the entire PG&E service territory (not just HFTD). CPUC Fire Incident Data Collection Plan - For the purposes of the Data Collection Proposal, a reportable event is any event where utility facilities are associated with the following conditions: 1) A self-propagating fire of material other than electrical and/or communication facilities, and 2) The resulting fire traveled greater than one linear meter from the ignition point, and 3) The utility has knowledge that the fire occurred.

(b) PG&E began tracking this metric in 2014. The full year of metric data is only available for 2014-2023.

(c) PG&E has included 2 ignitions in 2023 that meet Electric Incident Report criteria, defined by Appendix B to CPUC D.06-04-055. PG&E has not formed a conclusion about the origin or cause of these particular ignitions.

(d) The Ignition Investigation CPUC reportable counts are subject to potential changes as new findings emerge during the ongoing investigation process. PG&E reserves making the final determination on CPUC reportability until our reporting data to the commission, April 1st the following calendar year, to allow for the maximum time to perform

2023 SAFETY PERFORMANCE METRICS

TABLE 5  
GAS DIG-INS  
2014-2023

Line No.	Year	UOM	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	Gas Tickets													671313
2	2014	3rd Party Dig-ins													1621
3	2014	3rd Party Dig-in Ratio													2.41
4	2015	Gas Tickets													788901
5	2015	3rd Party Dig-ins													1694
6	2015	3rd Party Dig-in Ratio													2.15
7	2016	Gas Tickets	60154	68599	73839	69660	74564	76594	70610	84300	78050	73127	68549	60926	858972
8	2016	3rd Party Dig-ins	84	115	114	114	147	179	167	211	190	142	145	91	1734
9	2016	3rd Party Dig-in Ratio	1.4	1.68	1.54	2.11	2	2.34	2.37	2.5	2.43	1.94	2.12	1.49	2.02
10	2017	Gas Tickets	62163	61145	82191	73287	85223	84379	77764	90450	81709	89552	80815	73387	942665
11	2017	3rd Party Dig-ins	65	79	155	128	175	181	192	205	162	172	129	137	1780
12	2017	3rd Party Dig-in Ratio	1.05	1.29	1.89	1.75	2.04	2.15	2.47	2.27	1.98	1.92	1.6	1.87	1.89
13	2018	Gas Tickets	82986	77901	84149	89657	95567	91232	94206	104059	87105	101917	85994	74937	1069710
14	2018	3rd Party Dig-ins	93	127	96	137	195	160	179	174	159	164	131	103	1718
15	2018	3rd Party Dig-in Ratio	1.12	1.63	1.14	1.53	2.04	1.75	1.9	1.67	1.83	1.61	1.52	1.37	1.61
16	2019	Gas Tickets	90140	93011	122101	130536	128393	122987	145646	157091	155556	165328	129355	115970	1556114
17	2019	3rd Party Dig-ins	83	76	98	132	135	161	188	193	156	178	137	82	1619
18	2019	3rd Party Dig-in Ratio	0.92	0.82	0.8	1.01	1.05	1.31	1.29	1.23	1	1.08	1.06	0.71	1.04
19	2020	Gas Tickets	132997	130127	124530	119393	126695	142897	140577	134692	141309	136592	102979	102140	1534928
20	2020	3rd Party Dig-ins	88	111	96	114	123	153	188	175	169	148	119	120	1604
21	2020	3rd Party Dig-in Ratio	0.66	0.85	0.77	0.95	0.97	1.07	1.34	1.3	1.2	1.08	1.16	1.17	1.05
22	2021	Gas Tickets	104556	129518	165637	167973	156393	162111	150562	162597	128307	119879	119327	106685	1673545
23	2021	3rd Party Dig-ins	114	104	118	143	134	169	150	163	151	130	97	58	1531
24	2021	3rd Party Dig-in Ratio	1.09	0.80	0.71	0.85	0.86	1.04	1.00	1.00	1.18	1.08	0.81	0.54	0.91
25	2022	Gas Tickets	123,346	118,056	136,994	120,911	128,489	133,665	120,526	147,872	151,495	163,674	135,757	103,980	1,584,765
26	2022	3rd Party Dig-ins	111	101	132	110	139	140	135	144	114	122	90	41	1379
27	2022	3rd Party Dig-in Ratio	0.90	0.86	0.96	0.91	1.08	1.05	1.12	0.97	0.75	0.75	0.66	0.39	0.87
28	2023	Gas Tickets	84,550	81,594	101,177	110,662	111,848	104,490	99,867	116,426	113,640	124,174	114,519	90,616	1,253,563
29	2023	3rd Party Dig-ins	75	76	62	109	121	119	106	128	137	108	116	73	1230
30	2023	3rd Party Dig-in Ratio	0.89	0.93	0.61	0.98	1.08	1.14	1.06	1.10	1.21	0.87	1.01	0.81	0.98

(a) PG&E has EOY data available as of 2014. Monthly data not available for years 2014 and 2015.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 6**

**GAS IN-LINE INSPECTION  
2014-2023**

**"Miles Inspected"**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY (miles inspected)	Current System Total (Transmission)	% of Transmission Lines Inspected Annually
1	2014		52.1	20.3	17.9	11.9	6.4	66.8		6.9	96.3		142.8	421.3	5733	7%
2	2015			133.3				23.0	60.2	43.8		5.1		265.4	6541	4%
3	2016	3.0	7.1	0.8	15.9	29.0	12.8	57.5	8.6	7.7	114.6	1.9	0.6	259.5	6530	4%
4	2017	0.7	21.3			33.4	73.4	9.1	28.0	27.3		55.4	60.2	308.8	6535	5%
5	2018	43.2	22.4	7.4	36.9	42.9	0.6	1.3	18.3	6.0	75.2	43.2		297.4	6531	5%
6	2019	0.0	22.5	39.9	44.8	88.7	54.1	13.7	121.8	17.1	12.8	53.3	9.3	478.0	6498	7%
7	2020	0.4	0.0	29.0	62.7	67.3	120.9	17.1	25.7	1.3	8.9	22.4	4.0	359.6	6551	5%
8	2021	0.0	94.9	91.6	0.1	73.0	160.5	108.8	152.5	137.7	0.1	74.6	76.7	970.5	6417	15%
9	2022	0.0	0.0	85.2	6.5	73.2	27.2	0.1	125.9	33.6	12.9	110.1	22.8	497.6	6425	8%
10	2023		9.9	54.6	22.0	0.1	38.3	10.1	76.6	11.5	172.9	54.7	10.8	461.5	6386	7%

(a) Includes miles inspected for PSEP and base reliability work

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 7**

**GAS IN-LINE UPGRADE**

**2014-2023**

**"Miles Upgraded"**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Miles Upgraded
1	2014	6.7		21.9		32.9					4.0	6.4		71.9
2	2015					6.3		12.2		11.2	5.8	11.3	25.3	72.1
3	2016	1.5				44.3	21.7	11.9		4.8	10.5	12.4		107.2
4	2017						54.2				53.4	22.4	24.4	154.4
5	2018							13.1			97.9	63.2	68.7	243.0
6	2019			36.3	62.8	2.6		3.1		70.7	10.7		59.6	245.7
7	2020			44.0	43.6	47.2	55.9	85.9			48.8	95.5	43.3	464.2
8	2021				26.7	65.9	21.9	6.6		14.5			10.0	145.6
9	2022			4.7		39.4	36.0	4.6	24.7	40.5	82.2	20.4		252.6
10	2023							32.9		12.2	9.9		5.7	60.8

(a) Includes miles upgraded in both PSEP and base reliability programs.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 8**

**SHUT IN THE GAS MEDIAN TIME - MAINS**

**2014-2023**

**"Median Number of Minutes"**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY (Median)	EOY (Avg)
1	2014													97.0	120.8
2	2015													87.0	102.8
3	2016													87.0	104.4
4	2017													89.0	103.8
5	2018													73.0	88.8
6	2019													73.7	85.1
7	2020													77.1	93.7
8	2021													73.3	102.6
9	2022													82.1	97.0
10	2023													80.0	96.6

(a) Monthly data not available due to various tools/databases utilized to measure SITG since 2012.



**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 9**

**SHUT IN THE GAS AVERAGE TIME - SERVICES**

**2014-2023**

**"Median Number of Minutes"**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY (Median)	EOY (Avg)
1	2014													38.0	52.2
2	2015													40.0	49.0
3	2016													37.0	45.8
4	2017													36.0	45.2
5	2018													34.0	43.3
6	2019													33.6	41.4
7	2020													33.0	41.9
8	2021													32.3	43.5
9	2022													36.8	47.5
10	2023													35.3	45.4

(a) Monthly data not available due to various tools/databases utilized to measure SITG since 2012.

2023 SAFETY PERFORMANCE METRICS REPORT

TABLE 10

CROSS BORE INTRUSIONS

2014-2023

Line No.	Year	Unit Type	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	Inspections Complete													33,570
2	2014	Cross Bores Found													193
3	2014	Find Rate													5.72
4	2015	Inspections Complete													23,531
5	2015	Cross Bores Found													104
6	2015	Find Rate													4.42
7	2016	Inspections Complete	707	520	1467	1023	901	748	2064	1874	5276	2233	4494	2346	23,653
8	2016	Cross Bores Found	4	1	7	6	7	9	11	11	11	11	8	8	90
9	2016	Find Rate	5.66	1.92	4.77	5.87	7.77	12.03	5.33	5.87	1.33	4.93	1.78	3.41	3.81
10	2017	Inspections Complete	509	1000	1438	1923	2031	1936	653	3023	4707	5481	6291	6168	35,160
11	2017	Cross Bores Found	1	5	15	4	5	1	2	1	1	3	0	0	38
12	2017	Find Rate	1.96	3.98	7.13	5.13	4.35	3.51	3.48	2.72	2.03	1.67	1.31	1.08	1.08
13	2018	Inspections Complete	3232	3215	2166	4419	3568	4407	4463	5613	4851	2701	3844	3569	46,048
14	2018	Cross Bores Found	2	5	4	4	6	2	3	4	1	6	1	7	45
15	2018	Find Rate	0.62	1.09	1.28	1.15	1.27	1.09	1.02	0.97	0.86	0.96	0.89	0.98	0.98
16	2019	Inspections Complete	1739	1647	4365	2086	2816	9120	3480	6103	3035	3780	3880	1374	43,425
17	2019	Cross Bores Found	5	3	6	3	3	1	5	5	3	2	2	2	40
18	2019	Find Rate	0.62	1.09	1.28	1.15	1.27	1.09	1.02	0.97	0.86	0.96	0.89	0.98	0.98
19	2020	Inspections Complete	1788	1211	493	1435	1295	3052	681	1743	396	1720	622	2229	16,665
20	2020	Cross Bores Found	5	3	7	10	4	1	7	3	4	3	6	3	56
21	2020	Find Rate	2.80	2.67	4.30	5.07	4.66	3.23	3.72	3.42	3.64	3.40	3.67	3.36	3.36
22	2021	Inspections Complete	1317	1389	1954	2300	1583	1629	2413	2593	3945	3278	3512	2380	28,293
23	2021	Cross Bores Found	0	1	9	2	0	2	2	3	3	0	0	1	23
24	2021	Find Rate	0.00	0.37	2.15	1.72	1.40	1.38	1.27	1.25	1.15	0.98	0.85	0.81	0.81
25	2022	Inspections Complete	0	0	4020	4178	3890	3711	4353	4535	5804	5928	2796	3430	42,645
26	2022	Cross Bores Found	0	0	1	1	8	8	2	2	2	4	2	2	32
27	2022	Find Rate	0.00	0.00	0.25	0.24	0.83	1.14	0.99	0.89	0.79	0.77	0.77	0.75	0.75
28	2023	Inspections Complete	1542	1429	1160	980	634	875	664	584	153	8	23	33	80,85
29	2023	Cross Bores Found	0	1	3	9	2	3	0	0	2	2	3	2	29
30	2023	Find Rate (CROSS BORE INTRUSIONS PER 1,000 INSPECTIONS)	0.00	0.34	0.97	2.54	2.61	2.72	2.47	2.54	2.74	2.99	3.35	3.59	3.59

(a) PG&E did not track this metric before 2013.

(b) From 2013-2015, the Cross-Bore Inspect on Program was executed by an external contractor. Monthly data is not currently available.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 11A**

**GAS EMERGENCY RESPONSE TIME**

**2014-2023**

**MEDIAN MINUTES**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Median Emergency Response Time
1	2014	18.1	18.3	18.3	17.8	18.0	17.8	17.4	17.8	18.2	18.4	18.4	18.0	18.1
2	2015	18.0	18.1	18.2	18.3	18.4	18.7	18.8	19.2	18.9	18.5	18.5	18.2	18.5
3	2016	18.8	18.5	18.4	18.4	18.2	18.1	18.1	18.2	18.0	18.0	15.2	18.3	18.3
4	2017	18.4	18.2	18.1	18.2	18.4	18.8	19.5	19.0	18.8	19.2	15.4	19.1	18.7
5	2018	18.8	18.6	18.5	18.8	18.7	18.8	18.9	19.3	19.3	19.1	18.7	18.5	18.8
6	2019	18.7	19.1	18.9	18.4	18.4	19.0	19.0	19.0	19.3	19.4	19.3	18.9	18.9
7	2020	19.0	19.1	17.8	17.7	18.5	19.1	19.2	19.1	18.7	18.9	19.1	18.8	18.8
8	2021	19.0	19.0	18.9	18.8	18.9	18.7	18.7	18.7	18.8	18.8	19.0	18.8	18.8
9	2022	18.7	18.3	17.8	18.0	18.4	18.2	18.1	18.1	18.4	18.2	18.3	18.5	18.3
10	2023	18.9	18.4	18.3	18.7	18.3	17.9	18.0	18.2	17.9	18.0	17.9	17.6	18.2

**TABLE 11B**

**GAS EMERGENCY RESPONSE TIME**

**2014-2023**

**AVERAGES**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Average Emergency Response Time
1	2014	19.9	20.3	20.0	19.7	19.9	19.6	19.4	19.7	20.2	20.2	20.4	19.7	20.0
2	2015	19.7	19.8	20.1	20.1	20.5	20.7	20.8	21.0	20.7	20.4	20.4	19.9	20.3
3	2016	20.6	20.2	20.1	20.2	19.8	19.9	19.8	19.7	20.0	19.6	19.9	20.0	20.0
4	2017	20.2	19.9	19.7	19.8	20.0	20.5	21.1	20.8	21.1	20.9	20.8	21.0	20.4
5	2018	20.5	20.5	20.3	20.5	20.4	20.5	20.8	21.2	21.3	21.0	20.4	20.4	20.6
6	2019	20.6	21.0	20.7	20.0	20.1	20.8	20.9	20.8	21.2	21.2	21.3	20.8	20.8
7	2020	20.9	20.9	19.5	19.4	20.3	20.7	20.8	20.9	20.3	20.4	21.5	20.5	20.5
8	2021	20.8	20.7	20.7	20.6	20.6	20.6	20.6	20.5	20.5	20.5	20.6	20.6	20.6
9	2022	20.4	19.7	19.4	19.6	19.9	19.9	19.8	19.6	20.2	19.9	20.0	20.4	19.9
10	2023	20.7	20.0	20.0	20.2	19.8	19.5	19.6	19.8	19.4	19.5	19.6	19.2	19.8

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**TABLE 12**  
**NATURAL GAS STORAGE BASELINE INSPECTIONS PERFORMED**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Well Baseline Inspections	EOY % Progress to Goal <sup>a</sup>
1	2014								2	3	1			6	see note (a)
2	2015						2	1	2	1				6	see note (a)
3	2016					1	1		2	3		1	1	9	see note (a)
4	2017							1	1	2	2	1		7	see note (a)
5	2018				3	2	4	1	2	1				13	see note (a)
6	2019			1	1	2	2	2	2	1	1	2		14	13%
7	2020				3	3	5	3	4	2				20	31%
8	2021			1	1	4	5	5				1		17	47%
9	2022			3	3	3	5	2	1	1				18	63%
10	2023			3	1	2	3	2	3	2	3	1	1	21	83%

(a) PG&E has a goal to complete baseline well production casing assessments on 109 wells by 2024 per plan approved by CalGEM. Wells baselined prior to 2019 will be re-baselined using an

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 13**

**GAS SYSTEM INTERNAL INSPECTION STATUS**

**2014-2023**

**System Piggability**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY System Piggability	EOY Piggable Mileage Total
1	2014													22.99%	1506
2	2015													24.11%	1580
3	2016													25.75%	1687
4	2017													28.03%	1836
5	2018													31.73%	2079
6	2019													35.48%	2325
7	2020													42.55%	2788
8	2021													46.08%	2957
9	2022													49.82%	3201
10	2023													50.93%	3253

(a) Piggability % is dynamic since the Current system total mileage changes over the course of the year. Monthly data: we don't have the data available since the # of transmission miles is constar

**2022 SAFETY PERFORMANCE METRICS REPORT  
2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 14**

**DART RATE**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	0.27	0.19	0.28	0.38	0.35	0.37	0.37	0.38	0.86	0.94	0.98	1.05	1.05
2	2015	0.23	0.59	0.72	0.70	0.73	1.11	1.25	1.33	1.39	1.46	1.53	1.52	1.52
3	2016	0.57	1.41	1.39	1.31	1.33	1.31	1.35	1.51	1.58	1.52	1.59	1.70	1.70
4	2017	0.36	0.83	1.05	1.61	1.90	1.89	2.03	2.03	2.01	2.02	1.99	1.99	1.99
5	2018	1.22	1.30	1.29	1.47	1.56	1.51	1.65	1.74	1.81	1.78	1.74	1.81	1.81
6	2019	0.65	0.98	1.43	1.66	1.76	1.89	1.96	2.09	2.01	2.03	2.04	2.05	2.05
7	2020	0.76	1.44	1.34	1.30	1.19	1.17	1.22	1.37	1.31	1.36	1.37	1.34	1.34
8	2021	0.36	0.76	0.78	0.94	1.05	1.13	1.07	1.02	0.98	1.02	1.02	1.01	1.01
9	2022	0.10	0.33	0.53	0.61	0.58	0.60	0.63	0.64	0.65	0.63	0.62	0.67	0.67
10	2023	0.26	0.44	0.47	0.53	0.62	0.61	0.62	0.69	0.72	0.71	0.70	0.70	0.70

(a) Change in reporting process in 2016 which resulted in earlier classification

(b) Rates are company-wide

(c) Rates are cumulative

(d) Rates are by classification date

**2023 SAFETY PERFORMANCE METRICS REPORT  
TABLE 15A**

**Rate of EMPLOYEE SIF Actual using EEI SCL Model  
2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY	EOY Rate SPM (SCL model)	EOY Labor Hours
1	2014															
2	2015															
3	2016															
4	2017	0	1	0	1	0	0	0	0	0	0	0	0	3	0.013	46,859,884
5	2018	0	0	0	0	0	0	0	1	0	0	0	0	1	0.004	45,913,811
6	2019	0	0	0	0	0	0	0	0	0	0	0	0	0	0.000	46,684,596
7	2020	0	0	1	0	0	0	0	1	0	0	1	1	4	0.016	49,672,365
8	2021	0	0	0	0	0	0	0	0	0	0	0	0	0	0.000	51,877,570
9	2022	0	0	0	1	0	0	1	0	0	1	0	0	3	0.012	51,472,190
10	2023	1	0	0	1	0	1	0	0	0	0	0	0	3	0.011	54,186,956

(a) PG&E started tracking Employee SIF Actuals using the EEI SCL Model in 2017.

Labor hours by Month

Years	January	February	March	April	May	June	July	August	September	October	November	December
2017	3,896,332	3,771,980	4,333,833	3,765,548	4,251,370	4,004,976	3,517,755		3,745,093	4,308,181	3,687,157	3,441,936
2018	3,598,158	3,610,153	4,120,015	3,755,744	3,963,225	3,745,561	3,670,275	4,221,669	3,549,021	4,264,909	4,117,251	3,297,829
2019	3,707,483	3,823,635	3,939,982	3,934,898	3,955,218	3,654,569	3,867,271	3,984,534	3,793,849	4,686,374	3,595,922	3,740,862
2020	3,673,876	3,681,169	4,145,234	4,038,426	3,761,387	4,256,322	4,421,339	4,334,463	4,573,318	4,882,418	3,694,751	4,209,662
2021	3,839,472	4,020,854	4,883,961	4,466,083	4,094,847	4,471,078	4,233,635	4,554,241	4,353,125	4,468,465	3,940,192	4,393,539
2022	3,979,523	3,956,928	4,904,881	4,401,608	4,469,137	4,307,925	3,926,194	4,691,017	4,362,886	4,413,172	4,020,005	4,038,914
2023	4,579,056	4,113,526	5,275,478	4,094,301	4,596,734	4,394,232	4,144,950	4,843,326	4,497,490	5,048,984	4,487,642	4,111,237

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 15B**

**Rate of EMPLOYEE SIF Actual using OSHA definition  
2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY	EOY Rate	EOY Labor Hours
1	2014	0	0	0	0	0	0	0	1	0	1	0	0	2	0.009	45,772,256
2	2015	0	1	0	1	0	1	0	0	1	0	0	0	5	0.021	46,832,638
3	2016	1	0	0	0	0	0	1	0	1	0	1	0	4	0.017	48,269,076
4	2017	1	2	0	2	0	1	1	0	0	0	0	0	7	0.030	46,859,884
5	2018	0	0	0	1	0	0	0	1	0	0	0	1	3	0.013	45,913,811
6	2019	1	1	0	0	0	0	0	0	1	0	1	0	4	0.017	46,684,596
7	2020	1	0	0	1	0	0	0	2	0	0	1	1	6	0.024	49,672,365
8	2021	0	0	0	0	0	0	0	0	1	0	0	0	1	0.004	51,877,570
9	2022	0	0	0	2	0	0	1	0	1	0	0	0	5	0.019	51,472,190
10	2023	1	1	1	1	2	1	1	0	0	0	0	0	8	0.030	54,186,956

Labor hours by Month

Years	January	February	March	April	May	June	July	August	September	October	November	December
2017	3,896,332	3,771,980	4,333,833	3,765,548	4,251,370	4,004,976	3,517,755	4,135,723	3,745,093	4,308,181	3,687,157	3,441,936
2018	3,598,158	3,610,153	4,120,015	3,755,744	3,963,225	3,745,561	3,670,275	4,221,669	3,549,021	4,264,909	4,117,251	3,297,829
2019	3,707,483	3,823,635	3,939,982	3,934,898	3,955,218	3,654,569	3,867,271	3,984,534	3,793,849	4,686,374	3,595,922	3,740,862
2020	3,673,876	3,681,169	4,145,234	4,038,426	3,761,387	4,256,322	4,421,339	4,334,463	4,573,318	4,882,418	3,694,751	4,209,662
2021	3,839,472	4,020,854	4,883,961	4,466,083	4,094,847	4,471,078	4,233,635	4,554,241	4,353,125	4,468,465	3,940,192	4,393,539
2022	3,979,523	3,956,928	4,904,881	4,401,608	4,469,137	4,307,925	3,926,194	4,691,017	4,362,886	4,413,172	4,020,005	4,038,914
2023	4,579,056	4,113,526	5,275,478	4,094,301	4,596,734	4,394,232	4,144,950	4,843,326	4,497,490	5,048,984	4,487,642	4,111,237

Rates

Years	January	February	March	April	May	June	July	August	September	October	November	December
2017	0.051	0.106	0.000	0.106	0.000	0.050	0.057	0.000	0.000	0.000	0.000	0.000
2018	0.000	0.000	0.000	0.053	0.000	0.000	0.000	0.047	0.000	0.000	0.000	0.061
2019	0.054	0.052	0.000	0.000	0.000	0.000	0.000	0.000	0.053	0.000	0.056	0.000
2020	0.054	0.000	0.048	0.000	0.000	0.000	0.000	0.092	0.000	0.000	0.054	0.048
2021	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.046	0.000	0.000	0.000
2022	0.000	0.000	0.000	0.091	0.000	0.046	0.051	0.000	0.046	0.000	0.000	0.000
2023	0.044	0.049	0.038	0.049	0.044	0.091	0.048	0.000	0.000	0.000	0.000	0.000



**2023 SAFETY PERFORMANCE METRICS REPORT  
TABLE 16A**

**Rate of CONTRACTOR SIF Actual using EEI SCL Model  
2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Rate
1	2014													
2	2015													
3	2016													0.01
4	2017													0.01
5	2018													0.01
6	2019													0.01
7	2020	0.00	0.00	0.00	0.00	0.00	0.25	0.10	0.00	0.08	0.04	0.00	0.00	0.04
8	2021	0.00	0.00	0.05	0.00	0.09	0.04	0.00	0.00	0.00	0.03	0.03	0.00	0.02
9	2022	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.06	0.00	0.00	0.00	0.05	0.01
10	2023	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.004

(a) PG&E started tracking Contractor SIF Actuals using the EEI SCL Model in 2017 annually and 2020 monthly.

**SIF A Counts**

Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Total
2017				1						1			2
2018		1							1				2
2019						1	2						3
2020	0	0	0	0	0	5	2	0	2	1	0	0	10
2021	0	0	1	0	2	1	0	0	0	1	1	0	6
2022	0	0	0	0	1	0	0	2	0	0	0	1	4
2023	1	0	0	0	0	0	0	0	0	0	0	0	1

**Labor Hours**

Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Total
2017													35,549,334
2018													37,533,432
2019													45,602,936
2020	4,679,580	4,184,702	4,092,337	3,362,517	3,705,474	3,957,041	3,902,279	4,148,883	5,155,493	5,213,213	4,522,152	3,803,737	50,727,409
2021	3,694,147	3,572,311	4,088,318	4,342,521	4,243,240	4,892,206	4,875,056	5,699,173	6,406,370	6,753,807	5,964,609	6,086,095	60,617,853
2022	5,311,209	5,245,628	5,950,423	6,202,406	6,023,686	6,182,635	5,871,857	6,190,324	6,448,971	6,035,112	4,236,212	3,657,865	67,356,326
2023	4,172,820	3,987,163	4,616,137	4,822,905	5,188,900	5,285,016	4,926,162	6,422,173	5,855,195	5,065,414	3,910,259	2,685,576	56,937,719

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**TABLE 16B**  
**Rate of CONTRACTOR SIF Actual using OSHA definition**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY	EOY Rate	EOY Labor Hours
1	2014	0	0	0	0	0	0	0	0	1	1	0	0	2		
2	2015	0	0	0	0	0	0	0	0	0	1	0	1	2		
3	2016	0	0	0	0	0	0	0	0	0	0	0	1	1		
4	2017	0	1	0	1	0	0	0	0	0	1	0	0	3	0.02	35,549,334
5	2018	0	1	0	0	0	0	0	2	1	0	0	0	4	0.02	37,533,432
6	2019	0	0	0	0	4	4	3	0	0	0	0	0	7	0.03	45,602,936
7 (a)	2020	0	0	1	0	0	4	2	0	5	1	0	1	14	0.06	50,727,409
8	2021	0	1	2	2	3	3	0	0	0	1	1	0	13	0.04	60,617,853
9	2022	2	0	0	0	1	0	0	2	0	0	0	1	6	0.02	67,356,326
10	2023	2	0	1	0	0	0	0	0	0	0	0	0	3	0.01	56,937,719

(a) Four additional SIF events were added to July and September for 2020. There was a gap in the process which resulted in under-reported incidents at the end of the year.

Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Total
2019	2,806,768	3,050,589	3,330,635	3,429,181	3,948,334	3,716,684	3,905,669	4,507,574	4,031,132	4,477,318	4,370,348	4,028,703	45,602,936
2020	4,679,580	4,184,702	4,092,337	3,362,517	3,705,474	3,957,041	3,902,279	4,148,883	5,155,493	5,213,213	4,522,152	3,803,737	50,727,409
2021	3,694,147	3,572,311	4,088,318	4,342,521	4,243,240	4,892,206	4,875,056	5,699,173	6,406,370	6,753,807	5,964,609	6,086,095	60,617,853
2022	5,311,209	5,245,628	5,950,423	6,202,406	6,023,686	6,182,635	5,871,857	6,190,324	6,448,971	6,035,112	4,236,212	3,657,865	67,356,326
2023	4,172,820	3,987,163	4,616,137	4,822,905	5,188,900	5,285,016	4,926,162	6,422,173	5,855,195	5,065,414	3,910,259	2,685,576	56,937,719

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 17**

**RATE OF SIF POTENTIAL - EMPLOYEE**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016													
4	2017	0.10	0.11	0.09	0.16	0.19	0.25	0.06	0.19	0.05	0.14	0.05	0.17	0.13
5	2018	0.06	0.06	0.10	0.11	0.05	0.00	0.16	0.14	0.17	0.09	0.10	0.06	0.09
6	2019	0.16	0.16	0.10	0.20	0.25	0.27	0.05	0.05	0.05	0.13	0.22	0.05	0.14
7	2020	0.05	0.27	0.10	0.05	0.16	0.00	0.14	0.09	0.00	0.04	0.22	0.10	0.10
8	2021	0.10	0.00	0.04	0.09	0.00	0.13	0.14	0.09	0.09	0.13	0.05	0.18	0.09
9	2022	0.00	0.10	0.16	0.14	0.00	0.05	0.00	0.00	0.09	0.05	0.10	0.00	0.06
10	2023	0.09	0.05	0.04	0.24	0.09	0.18	0.10	0.04	0.00	0.04	0.13	0.05	0.08

(a) Rates are monthly

(b) PG&E started tracking Employee SIF Potentials in 2017

**SIF P Counts**

Years	January	February	March	April	May	June	July	August	September	October	November	December	EOY
2017	2	2	2	3	4	5	1	4	1	3	1	3	31
2018	1	1	2	2	1	0	3	3	3	2	2	1	21
2019	3	3	2	4	5	5	1	1	1	3	4	1	33
2020	1	5	2	1	3	0	3	2	0	1	4	2	24
2021	2	0	1	2	0	3	3	2	2	3	1	4	23
2022	0	2	4	3	0	1	0	0	2	1	2	0	15
2023	2	1	1	5	2	4	2	1	0	1	3	1	23

**Labor hours by Month**

Years	January	February	March	April	May	June	July	August	September	October	November	December	EOY
2017	3,896,332	3,771,980	4,333,833	3,765,548	4,251,370	4,004,976	3,517,755	4,135,723	3,745,093	4,308,181	3,687,157	3,441,936	46,859,884
2018	3,598,158	3,610,153	4,120,015	3,755,744	3,963,225	3,745,561	3,670,275	4,221,669	3,549,021	4,264,909	4,117,251	3,297,829	45,913,811
2019	3,707,483	3,823,635	3,939,982	3,934,898	3,955,218	3,654,569	3,867,271	3,984,534	3,793,849	4,686,374	3,595,922	3,740,862	46,684,596
2020	3,673,876	3,681,169	4,145,234	4,038,426	3,761,387	4,256,322	4,421,339	4,334,463	4,573,318	4,882,418	3,694,751	4,209,662	49,672,365
2021	3,839,472	4,020,854	4,883,961	4,466,083	4,094,847	4,471,078	4,233,635	4,554,241	4,353,125	4,468,465	3,940,192	4,393,539	51,877,570
2022	3,979,523	3,956,928	4,904,881	4,401,608	4,469,137	4,307,925	3,926,194	4,691,017	4,362,886	4,413,172	4,020,005	4,038,914	51,472,190
2023	4,579,056	4,113,526	5,275,478	4,094,301	4,596,734	4,394,232	4,144,950	4,843,326	4,497,490	5,048,984	4,487,642	4,111,237	54,186,956

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 18**

**RATE OF SIF POTENTIAL - CONTRACTOR**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016													
4	2017													
5	2018													
6	2019													
7	2020						0.30	0.10	0.14	0.08	0.00	0.04	0.00	0.09
8	2021	0.11	0.00	0.10	0.09	0.24	0.29	0.00	0.14	0.12	0.12	0.03	0.16	0.12
9	2022	0.15	0.23	0.13	0.13	0.03	0.06	0.20	0.13	0.28	0.20	0.05	0.05	0.14
10	2023	0.10	0.10	0.13	0.08	0.12	0.26	0.12	0.09	0.07	0.12	0.05	0.07	0.11

(a) PG&E started tracking Contractor SIF Potentials in June of 2020

(b) Rates are monthly

**Contractor SIF P Counts**

Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
2020						6	2	3	2	0	1	0	14
2021	2	0	2	2	5	7	0	4	4	4	1	5	36
2022	4	6	4	4	1	2	6	4	4	9	6	1	48
2023	2	2	3	2	3	7	3	3	2	3	1	1	32

**Contractor Hours Worked**

Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
2020						3,957,041	3,902,279	4,148,883	5,155,493	5,213,213	4,522,152	3,803,737	30,702,798
2021	3,694,147	3,572,311	4,088,318	4,342,521	4,243,240	4,892,206	4,875,056	5,699,173	6,406,370	6,753,807	5,964,609	6,086,095	60,617,853
2022	5,311,209	5,245,628	5,950,423	6,202,406	6,023,686	6,182,635	5,871,857	6,190,324	6,448,971	6,035,112	4,236,212	3,657,865	67,356,326
2023	4,172,820	3,987,163	4,616,137	4,822,905	5,188,900	5,285,016	4,926,162	6,422,173	5,855,195	5,065,414	3,910,259	2,685,576	56,937,719

**2023 SAFETY PERFORMANCE METRICS REPORT  
TABLE 19**

**CONTRACTOR DART CASE RATE**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016													
4	2017	0.73	0.22	0.68	0.41	0.74	0.46	0.90	0.44	0.58	0.33	0.81	0.47	0.56
5	2018	0.85	1.21	0.95	0.54	0.14	0.44	0.50	0.57	0.83	0.37	0.47	0.39	0.61
6	2019	0.36	0.13	0.49	0.65	0.77	0.55	0.58	0.27	0.51	0.60	0.25	0.43	0.47
7	2020	0.34	0.43	0.15	0.24	0.22	0.71	0.77	0.34	0.78	0.42	0.22	0.37	0.42
8	2021	0.27	0.22	0.44	0.18	0.42	0.16	0.16	0.11	0.09	0.33	0.20	0.12	0.32
9	2022	0.53	0.38	0.35	0.31	0.33	0.31	0.29	0.32	0.32	0.30	0.31	0.29	0.29
10	2023	0	0.1	0.35	0.17	0.19	0.38	0.37	0.47	0.14	0.39	0.61	0.22	0.29

(a) ISNetworld program implementation began in 2017

(b) Data is self-reported for PG&E performance work

(c) Rates are cumulative for 2023

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 20**

**PUBLIC SIF**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	1	4	3	5	6	1	8	5	2	3	8	10	56
2	2015	1	5	3	8	2	8	5	6	6	4	5	1	54
3	2016	2	0	2	4	6	2	2	4	2	3	2	0	29
4	2017	2	0	3	2	0	2	4	4	2	26	3	1	49
5	2018	0	5	2	1	4	1	1	1	2	0	88	1	106
6	2019	3	1	2	1	2	3	4	2	3	2	2	2	27
7	2020	0	0	2	1	2	2	2	0	1	1	1	2	14
8	2021	2	1	0	6	2	2	3	4	2	0	1	0	23
9	2022	3	2	2	4	2	2	1	2	2	2	1	0	23
10	2023	0	1	0	1	4	0	3	2	1	4	2	0	18

NOTE: Since the 2021 SPM Report, four wildfire incidents have been included as determined SPMs (Atlas, Redwood Valley, Nuns, and Cascade wildfires) The Kincaide and Zogg wildfire incidents are pending final determination and not included at this time.

Three incident have been added to the 2022 metrics. The total count for 2022 is now 23.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 21A**

**HELICOPTER / FLIGHT ACCIDENT OR INCIDENT (TOTAL INCIDENTS)**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014									1				1
2	2015													1
3	2016													
4	2017							1						1
5	2018													
6	2019													
7	2020						1	1						2
8	2021													
9	2022					1								2
10	2023													

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 21B**

**(total number of flight hours per year for reporting the number of incidents per 100,000 flight hours)**

**HELICOPTER / FLIGHT ACCIDENT OR INCIDENT**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	647	700	1,120	1,179	1,097	1,150	905	1,328	1,531	1,376	850	766	12,650
2	2015	931	927	1,045	1,121	1,254	1,768	1,448	1,632	1,668	1,531	761	675	14,759
3	2016	564	816	1,091	775	730	1,274	1,634	1,744	1,449	1,351	808	636	12,871
4	2017	747	940	1,085	619	1,089	1,212	1,243	1,578	1,738	2,347	1,003	1,157	14,758
5	2018	678	1,041	1,241	1,241	1,128	2,538	2,029	3,491	3,165	3,700	2,039	1,452	23,745
6	2019	1,369	1,620	1,747	2,299	2,356	2,471	2,889	3,439	4,017	5,871	2,748	1,674	32,500
7	2020	1,913	2,140	1,935	2,101	2,662	2,157	3,333	3,119	3,427	4,670	2,284	1,660	31,401
8	2021	1,118	562	3,358	311	3,850	824	4,290	3,007	4,021	3,564	3,236	1,934	30,079
9	2022	1,886	1,708	2,100	1,942	2,441	2,653	2,783	3,606	3,255	4,423	3,634	1,084	31,514
10	2023	976	2334	2377	2658	2938	3106	2209	2795	2883	2736	2621	1874	29508

PG&E does not have the data before 2017.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 22**

**PERCENTAGE OF SIF CORRECTIVE ACTIONS COMPLETED ON TIME**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016													
4	2017				100%	100%	100%	87%	94%	100%	100%	96%	100%	100%
5	2018	100%	100%	100%	100%	96%	97%	96%	95%	92%	93%	93%	93%	93%
6	2019	69%	89%	91%	95%	95%	96%	96%	97%	95%	95%	93%	94%	94%
7	2020	86%	75%	65%	72%	68%	71%	72%	78%	78%	79%	80%	79%	79%
8	2021	72%	86%	92%	92%	95%	95%	94%	95%	96%	96%	97%	97%	97%
9	2022	97%	98%	98%	97%	98%	97%	97%	98%	98%	98%	98%	98%	98%
10	2023	100%	100%	99%	99%	99%	99%	99%	98%	98%	98%	98%	98%	98%

(a) Tracking began in 2017

(b) Percentages are cumulative



**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 23**

**HARD BRAKE RATE**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016	4.3	4.5	4.6	4.7	4.6	4.3	4.2	4.0	4.0	4.1	4.1	4.0	4.0
4	2017	3.3	3.3	3.4	3.4	3.5	3.6	3.7	3.7	3.7	3.7	3.6	3.6	3.6
5	2018	3.0	3.0	3.0	2.9	2.9	2.8	2.7	2.7	2.7	2.7	2.7	2.6	2.6
6	2019	2.1	2.2	2.2	2.2	2.2	2.2	2.1	2.1	2.1	2.1	2.1	2.1	2.1
7	2020	2.0	2.0	2.0	1.9	1.9	1.9	1.8	1.8	1.8	1.7	1.7	1.6	1.6
8	2021	1.0	1.0	0.9	0.9	0.9	0.8	0.8	0.7	0.7	0.6	0.6	0.6	0.6
9	2022	0.3	0.3	0.2	0.2	0.3	0.3	0.3	0.2	0.3	0.3	0.3	0.3	0.3
10	2023	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3

(a) Rates were not tracked until 2016

(b) Rates are cumulative

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 24**

**DRIVER'S CALL COMPLAINT RATE  
2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016	12.8	11.0	10.6	10.7	10.3	10.1	10.2	10.3	10.5	10.2	10.2	10.0	10.0
4	2017	6.5	7.9	8.5	8.2	8.4	8.6	8.4	9.4	9.7	8.0	7.9	8.0	8.0
5	2018	7.7	8.2	9.3	8.8	8.4	7.7	7.3	8.4	8.3	8.1	8.0	8.0	8.0
6	2019	5.4	6.2	6.3	5.7	5.8	6.0	6.4	6.4	6.3	6.3	6.1	5.9	5.9
7	2020	5.1	5.3	5.3	4.8	4.7	4.5	4.5	4.5	4.5	4.3	4.3	4.3	4.3
8	2021	2.6	2.5	2.7	3.0	2.7	2.7	4.3	4.5	4.7	4.7	4.6	4.5	4.5
9	2022	3.2	4.2	4.4	4.3	4.4	4.5	4.4	4.5	4.6	4.5	4.7	4.7	4.7
10	2023	6.8	6.1	6.0	6.0	5.7	5.4	5.2	5.1	5.0	4.8	4.7	4.6	4.6

(a) Rates were not tracked until 2016

(b) Rates are cumulative

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 25A**

**DISTRIBUTION WIRES-DOWN NOT RESULTING IN AUTOMATIC DE-ENERGIZATION (ANNUAL)**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2	2015	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3	2016	9.4%	15.7%	13.2%	14.7%	11.3%	17.7%	13.7%	15.3%	15.6%	15.1%	16.1%	10.7%	13.6%
4	2017	8.0%	7.3%	9.1%	10.1%	14.7%	13.5%	14.6%	19.0%	15.0%	9.6%	12.9%	15.1%	10.1%
5	2018	10.8%	9.5%	10.8%	15.4%	16.7%	18.4%	13.1%	20.1%	14.7%	14.9%	15.1%	12.3%	14.1%
6	2019	12.3%	9.0%	13.6%	13.7%	11.4%	15.7%	16.4%	15.0%	13.9%	15.9%	10.7%	13.9%	11.9%
7	2020	14.3%	11.8%	10.4%	17.6%	26.3%	23.7%	25.5%	18.6%	18.2%	18.8%	19.2%	9.7%	16.9%
8	2021	9.0%	14.8%	21.6%	19.8%	14.0%	20.3%	22.0%	23.4%	17.3%	18.4%	21.2%	8.0%	13.7%
9	2022	10.7%	20.3%	19.8%	14.4%	14.5%	13.9%	13.8%	15.5%	15.8%	17.6%	15.8%	10.8%	14.1%
10	2023	7.7%	6.8%	7.8%	10.0%	15.1%	17.2%	16.5%	10.8%	15.1%	14.7%	21.5%	16.5%	9.3%

- (a) PG&E updated its reporting tools and began reporting energized distribution wire down events starting in 2015 with 2016 being the first full year reporting these events.
- (b) For safety reasons, field personnel generally treat wire down events as energized if unknown and these percentages represent the information reported as actually being energized.
- (c) The data in this table is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

**TABLE 25B  
TRANSMISSION WIRES-DOWN NOT RESULTING IN AUTOMATIC DE-ENERGIZATION (ANNUAL)  
2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2	2015	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3	2016	0.0%	16.7%	0.0%	25.0%	0.0%	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%	0.0%	6.4%
4	2017	5.9%	13.6%	0.0%	0.0%	0.0%	0.0%	14.3%	0.0%	0.0%	9.1%	0.0%	0.0%	6.3%
5	2018	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	12.5%	0.0%	0.0%	0.0%	0.0%	0.0%	2.3%
6	2019	12.5%	3.7%	0.0%	20.0%	0.0%	0.0%	0.0%	0.0%	0.0%	66.7%	0.0%	0.0%	9.1%
7	2020	8.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	33.3%	0.0%	4.5%
8	2021	3.7%	33.3%	11.1%	0.0%	0.0%	0.0%	100.0%	25.0%	0.0%	20.0%	0.0%	3.8%	8.8%
9	2022	0.0%	0.0%	0.0%	0.0%	20.0%	0.0%	100.0%	66.7%	0.0%	0.0%	0.0%	0.0%	11.4%
10	2023	2.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%

- (a) PG&E updated its reporting tools and began reporting energized distribution wire down events starting in 2015 with 2016 being the first full year reporting these events.
- (b) For safety reasons, field personnel generally treat wire down events an energized if unknown and these percentages represent the information reported as actually being energized.
- (c) The data in this table is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.
- (d) Based on outages where the circuit was manually de-energized without securing in advance approval from CAISO (emergency force out).

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 26A**

**MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS**

**2014-2023**

***Transmission Patrols***

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	2016	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	2017	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	2018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	2019	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7	2020	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	2021	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.07%	0.00%	0.00%	0.00%	0.07%
9	2022	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	2023	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

(a) PG&E did not track this metric until 2015

**TABLE 26B**

**MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS**

**2014-2023**

***Transmission Inspections***

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	2016	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	2017	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	2018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	2019	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7	2020	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	2021	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	2022	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	2023	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

(a) PG&E did not track this metric until 2015

**TABLE 26C**  
**MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS**  
**2014-2023**  
**Distribution Patrols**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	2016	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	2017	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	2018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	2019	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%
7	2020	0.00%	0.00%	0.00%	60%	31.66%	30.00%	14.40%	2.58%	2.04%	1.36%	0.07%	0.00%	8.61%
8	2021	0.00%	0.00%	0.00%	7.93%	7.72%	1.61%	0.18%	0.00%	0.00%	0.00%	0.00%	0.00%	0.86%
9	2022			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	2023			0.00%	66.57%	0.59%	1.67%	2.21%	0.00%	0.00%	0.00%	0.00%	0.00%	3.94%

(a) PG&E did not track this metric until 2015

**TABLE 26D**  
**MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS**  
**2014-2023**  
**Distribution Inspections**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	2016	0.00%	0.00%	0.00%	0.22%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.03%
4	2017	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.42%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04%
5	2018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	2019	0.00%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7	2020	0.00%	0.00%	0.00%	94.58%	69.47%	44.51%	20.07%	5.15%	0.53%	0.18%	0.14%	0.00%	9.01%
8	2021	0.00%	0.00%	0.00%	55.39%	29.02%	17.51%	0.77%	0.72%	0.04%	0.06%	0.00%	0.00%	4.10%
9	2022			0.00%	0.00%	0.00%	0.00%	0.00%	10.39%	2.89%	8.68%	24.44%	125.00%	0.03%
10	2023			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

(a) PG&E did not track this metric until 2015

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 27**

**OVERHEAD CONDUCTOR SIZE IN HIGH FIRE THREAT DISTRICT, TIERS 2 AND 3, (HFTD)**

**2014-2023**

**Percentage of 6Cu in HFTD**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016													
4	2017													10.69%
5	2018													10.52%
6	2019													10.35%
7	2020													10.18%
8	2021													10.03%
9	2022													10.04%
10	2023													10.49%

(a) This is a new metric for PG&E to track, and EDGIS system capabilities only have annual data snapshots as far back as 2017 and we currently do not have the ability to display the results in a monthly manner.

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**TABLE 28A**  
**GAS OPERATION CORRECTIVE ACTIONS BACKLOG (ANNUAL)**  
**2014-2023**  
**GAS DISTRIBUTION**

Line No.	Year	Overdue Work Orders	Total Work orders	GAS OPERATIONS CORRECTIVE ACTIONS BACKLOG DISTRIBUTION (ANNUAL)
1	2014	8	6531	0.00
2	2015	74	7234	0.01
3	2016	2	7127	0.00
4	2017	22	4419	0.00
5	2018	48	4803	0.01
6	2019	37	24698	0.00
7	2020	74	11675	0.01
8	2021	324	13067	0.02
9	2022	44	20309	0.00
10	2023	2575	13397	0.19

**TABLE 28B**  
**GAS OPERATION CORRECTIVE ACTIONS BACKLOG (ANNUAL)**  
**2013-2022**  
**GAS TRANSMISSION**

Line No.	Year	Overdue Work Orders	Total Work orders	GAS OPERATIONS CORRECTIVE ACTIONS BACKLOG TRANSMISSION (ANNUAL)
1	2014	0	416	0.00
2	2015	17	404	0.04
3	2016	0	957	0.00
4	2017	0	518	0.00
5	2018	9	829	0.01
6	2019	10	559	0.02
7	2020	20	716	0.03
8	2021	32	977	0.03
9	2022	85	441	0.19
10	2023	4	304	0.01

Note: Monthly data not available.



**2023 SAFETY PERFORMANCE METRICS REPORT  
TABLE 29  
GO-95 CORRECTIVE ACTIONS (TIERS 2 AND 3, HFTD)**

**2014-2023  
DISTRIBUTION, TRANSMISSION AND VEGETATION MANAGEMENT**

Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY	
Distribution	2014													
	2015													
	2016													
	2017													
	2018													
	2019													
	2020	23%	30%	15%	12%	18%	28%	9%	19%	27%	16%	9%	12%	15%
	2021	7%	5%	21%	18%	11%	13%	15%	17%	22%	19%	18%	25%	16%
	2022	17%	22%	23%	19%	26%	23%	16%	24%	27%	9%	6%	5%	17%
	2023	5%	22%	21%	6%	6%	6%	6%	22%	23%	23%	29%	32%	8%
2014														
2015														
2016														
2017														
2018														
2019														
2020	71%	67%	68%	72%	76%	75%	77%	77%	75%	54%	34%	30%	70%	
2021	31%	39%	51%	55%	65%	52%	64%	78%	58%	45%	24%	33%	49%	
2022	25%	32%	61%	65%	53%	55%	97%	50%	34%	15%	16%	19%	46%	
2023	26%	35%	38%	38%	46%	55%	40%	31%	59%	76%	79%	73%	47%	
2014														
2015														
2016														
2017														
2018														
2019														
2020	98%	98%	84%	91%	94%	96%	96%	96%	92%	89%	88%	85%	92%	
2021	94%	95%	92%	94%	94%	91%	94%	96%	95%	96%	97%	98%	95%	
2022	99%	99%	98%	92%	98%	96%	98%	99%	99%	99%	99%	99%	98%	
2023	98%	99%	98%	98%	99%	99%	98%	98%	98%	98%	97%	99%	98%	

(a) PG&E's 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

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**TABLE 30A**  
**GAS TRANSMISSION LARGE OVERPRESSURE EVENTS**  
**2014-2023**

**Number of Large OP Events**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	1	0	0	0	0	0	0	2	0	0	0	0	3
2	2015	0	0	0	0	0	0	1	1	0	0	0	0	2
3	2016	0	0	0	1	0	1	0	0	0	1	0	1	4
4	2017	0	0	0	2	1	0	0	1	0	3	0	0	7
5	2018	0	0	0	0	0	1	1	0	0	1	2	1	5
6	2019	0	0	0	1	1	1	1	1	0	0	1	1	7
7	2020	0	1	1	0	0	2	1	2	0	0	0	0	7
8	2021	0	0	0	0	0	1	1	0	0	0	0	1	2
9	2022	1	0	1	1	0	0	1	1	1	0	0	0	6
10	2023	0	0	2	0	1	0	0	0	0	0	0	0	3

**TABLE 30B**  
**GAS DISTRIBUTION LARGE OVERPRESSURE EVENTS**  
**2014-2023**

**Number of Large OP Events**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Large OP Events
1	2014	2	0	0	0	0	0	0	0	0	0	2	0	4
2	2015	1	0	1	0	0	0	0	1	0	0	0	0	3
3	2016	0	0	0	0	0	2	1	1	0	1	1	0	6
4	2017	1	0	0	0	0	1	1	0	1	1	0	0	4
5	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2019	1	0	0	0	0	2	0	0	0	2	1	0	4
7	2020	0	0	0	0	0	0	1	0	1	0	0	0	2
8	2021	0	0	0	0	1	0	0	0	0	1	1	0	3
9	2022	0	0	0	0	1	0	0	1	1	0	0	0	3
10	2023	0	0	0	1	1	0	0	0	0	0	0	0	2

2023 SAFETY PERFORMANCE METRICS REPORT

TABLE 31

GAS IN-LINE INSPECTIONS MISSED

2014-2023

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	0	0	0	0	0	0	0	0	0	0	0	0	0
2	2015	0	0	0	0	0	0	0	0	0	0	0	0	0
3	2016	0	0	0	0	0	0	0	0	0	0	0	0	0
4	2017	0	0	0	0	0	0	0	0	0	0	0	0	0
5	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2021	0	0	0	0	0	0	0	0	0	0	0	1	1
9	2022	0	0	0	0	0	1	0	0	0	0	0	0	1
10	2023	0	0	0	0	0	0	0	0	0	0	0	0	0

**2023 SAFETY PERFORMANCE METRICS REPORT  
TABLE 32  
OVERHEAD CONDUCTOR SAFETY INDEX (ANNUAL)**

**2014-2023**

**A) T&D Wire Down Events (non MED)**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	168	301	246	193	178	181	193	189	163	221	181	398	2612
2	2015	158	237	143	185	154	198	183	225	188	219	274	409	2573
3	2016	430	184	511	270	225	211	224	178	213	343	219	292	3300
4	2017	283	376	378	242	263	238	233	215	230	204	246	157	3065
5	2018	216	174	370	231	209	231	272	204	167	213	208	287	2782
6	2019	335	249	335	238	311	206	198	210	216	138	232	341	3009
7	2020	159	172	245	228	235	213	196	240	192	180	237	196	2493
8	2021	261	187	292	174	217	238	213	181	208	255	248	265	2739
9	2022	276	149	189	274	212	255	196	171	195	142	252	425	2736
10	2023	383	231	772	211	175	152	177	253	147	157	197	219	3074

**B) T&D Wire Down Events (non MED)/Total Circuit Miles**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	1.70	3.04	2.49	1.95	1.80	1.83	1.95	1.91	1.65	2.23	1.83	4.02	26.41
2	2015	1.60	2.40	1.45	1.87	1.56	2.00	1.85	2.28	1.90	2.21	2.77	4.14	26.02
3	2016	4.35	1.86	5.17	2.73	2.28	2.13	2.27	1.80	2.15	3.47	2.21	2.95	33.37
4	2017	2.86	3.80	3.82	2.45	2.66	2.41	2.36	2.17	2.33	2.06	2.49	1.59	31.00
5	2018	2.18	1.76	3.74	2.34	2.11	2.34	2.75	2.06	1.69	2.15	2.10	2.90	28.13
6	2019	3.39	2.52	3.39	2.41	3.15	2.08	2.00	2.12	2.18	1.40	2.35	3.45	30.43
7	2020	1.61	1.74	2.48	2.31	2.38	2.15	1.98	2.43	1.94	1.82	2.40	1.98	25.21
8	2021	2.64	1.89	2.95	1.76	2.19	2.41	2.15	1.83	2.10	2.58	2.51	2.68	27.70
9	2022	2.79	1.51	1.91	2.77	2.14	2.58	1.98	1.73	1.97	1.44	2.55	4.30	27.67
10	2023	3.89	2.35	7.84	2.14	1.78	1.54	1.80	2.57	1.49	1.60	2.00	2.22	31.23

(a) Table 32B performance has been corrected to align with the metric definition to multiple by 1000. This impacts all years and previously submitted 2021 and 2022 reports.

(b) The data in this table is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**ATTACHMENT B**  
**REPORT METRIC 22 – PUBLIC SIF SUBCATEGORIES**  
**PER SPD REQUEST**

**PACIFIC GAS AND ELECTRIC COMPANY  
2023 PUBLIC SERIOUS INJURIES and FATALITIES (SIFs)**

Event Date	Description	SPD Subcategories	Serious Injury	Fatality	Total Parties Involved
2/6/2023	Individual tripped on an underground electrical box	Other Non-Categorized Cause (slip and trip)	1	0	1
4/24/2023	Drowning at Bass Lake adjacent to Lupine Campground Day Use area.	Other Non-Categorized Cause (drowning)	0	1	1
5/8/2023	A waste management garbage truck contacted a live guy cable. An employee contacted the truck with a metal trash bin.	Individual contact with conductor	1	0	1
5/17/2023	A 3rd party individual was unloading a manlift when the boom contacted the overhead primary line.	Individual contact with conductor	0	1	1
5/22/2023	A third-party individual opened a pad mount transformer and experienced an electric shock.	Individual contact with conductor	1	0	1
5/28/2023	An individual jumped from the Miocene Head Dam and drowned	Other Non-Categorized Cause (drowning)	0	1	1
7/10/2023	Coworker at a stop sign, failed to yield the right of way to third-party motorcyclist prior to making a left turn.	Vehicle collision with utility facilities	1	0	1
7/13/2023	A contract partner truck was traveling northeast and encountered a sudden stop in traffic. The driver was unable to come to a complete stop and collided with a third-party passenger vehicle.	Vehicle collision with utility facilities	1	0	1
7/14/2023	PG&E coworker was traveling southbound when a 3rd Party vehicle traveling northbound cut across all lanes and a collision occurred.	Vehicle collision with utility facilities	0	1	1
8/10/2023	A third-party individual, not performing work for PG&E, was doing work on a customer's equipment when the boom contacted the overhead primary line.	Individual contact with conductor	0	1	1
8/16/2023	A third-party individual made contact with downed primary lines which resulted in a fatality in Mendota, Fresno County.	Individual contact with conductor	0	1	1
10/5/2023	The driver of a truck and backhoe trailer with backhoe was hit by a third-party vehicle	Vehicle collision with utility facilities	1	0	1
10/5/2023	An unhoused person attempted to cut into an energized line.	Individual contact with conductor	1	0	1
10/18/2023	Drowning on Pinecrest lake	Other Non-Categorized Cause (drowning)	0	1	1
10/24/2023	A third-party tree crew made contact with the primary lines.	Individual contact with conductor	1	0	1
11/4/2023	A car pole incident resulted in a downed wire and member of the public being taken to hospital by ambulance.	Vehicle collision with utility facilities	1	0	1
11/7/2023	Troubleshooter observed a drone stuck in a tree with a metal ladder and metal pole near the tree as well as a deceased person on the ground.	Individual contact with conductor	0	1	1

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**PACIFIC GAS AND ELECTRIC COMPANY**

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**IN COMPLIANCE WITH**  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**  
**DECISION 19-04-020 AND DECISION 21-11-009**

**APRIL 1, 2024**

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PACIFIC GAS AND ELECTRIC COMPANY  
2023 SAFETY PERFORMANCE METRICS REPORT

TABLE OF CONTENTS

Section	Title	Page
1	INTRODUCTION	1-1
2	METRIC DATA EXAMPLES	2-1
3	BIAS CONTROLS AND METHODOLOGY	3-1
4	2023 IMPUTED ADOPTED VALUES FOR SAFETY-RELATED RISK MITIGATION AND CONTROLS ACTIVITIES	4-1
5	SAFETY PERFORMANCE METRICS	5-1
Attachment A	MONTHLY METRIC DATA TABLES	AtchA-1
Attachment B	REPORT METRIC 22 – PUBLIC SIF SUBCATEGORIES PER SPD REQUEST	AtchB-1



**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**SECTION 1**  
**INTRODUCTION**

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **2023 SAFETY PERFORMANCE METRICS REPORT**  
3                                   **SECTION 1**  
4                                   **INTRODUCTION**

5   **I. Introduction**

6                   Pacific Gas and Electric Company (PG&E) submits its 2023 Safety  
7   Performance Metrics Report (SPMR) in compliance with Decision (D.) 19-04-020  
8   and D.21-11-009 concerning the Risk-Based Decision-Making Framework  
9   proceeding, Rulemaking 20-07-013. The purpose of the SPMR is to provide the  
10   Commission and interested parties' information on PG&E's performance related  
11   to key safety metrics.

12                  Safety is PG&E's most important responsibility. Our customers and  
13   communities deserve the assurance that we will deliver electricity and natural  
14   gas safely and reliably.

15                  PG&E is committed to continuing to improve the safety of our workforce and  
16   the public. Benchmarking and safety metrics are measured and analyzed to  
17   drive business decisions and the right behavior as we continue to strengthen our  
18   safety efforts. PG&E monitors our progress with a focus on leading indicators as  
19   well as lagging metrics to show our progress over time. This helps PG&E  
20   identify and address the underlying causes of safety incidents to prevent them  
21   from reoccurring.

22                  The information in this SPMR confirms areas where PG&E has shown  
23   significant safety progress over the past decade. At the same time, as shown in  
24   other datasets, we have more work to do.

25                  PG&E's focus is on building an accountable, transparent organization that  
26   embraces a Speak Up culture, where raising issues and ideas are encouraged.  
27   PG&E's safety stand is "Everyone and Everything is Always Safe." To support  
28   this stand, one of the key initiatives under PG&E's 10-Year True North Strategy  
29   is to drive toward public and coworker safety. Our objective continues to be  
30   demonstrating, through our actions, that we are working every day towards  
31   restoring trust with sustained performance and accountability.

1 **a. Background**

2 Pursuant to D.19-04-020, for its 2019 and 2020 reporting years, PG&E  
 3 reported performance against 25 Safety Performance Metrics (SPM),  
 4 including providing up to 10 years of historical data.

5 On November 9, 2021, through the Commission’s Risk Based Decision  
 6 Making Framework rulemaking process that began on November 17, 2020,  
 7 the Commission approved D.21-11-009 approving 32 existing, updated, and  
 8 new SPMs. Accordingly, in this SPMR, PG&E is providing metric data on the  
 9 32 metrics shown in the table below. Please see Section 5 for more detailed  
 10 information on each individual metric.

11 **b. Summary of 2023 Metric Data**

Metric Name	Units	2023 Data
1. Transmission & Distribution (T&D) Overhead Wires-Down Non-Major Event Days	Number of wires-down events	3,074
2. Transmission & Distribution (T&D) Overhead Wires Down - Major Event Days	Number of wires-down events	7,173
3. Electric Emergency Response Time	The time in minutes that an electric crew person or a qualified first responder takes to respond after receiving a call which results in an emergency order.	Average: 32 minutes Median: 29 minutes
4. Fire Ignitions	Number of ignitions	379
5. Gas Dig-In	The number of 3rd party gas dig ins per 1,000 USA tags/tickets	Gas Tickets: 1,253,563 3rd Party Dig-ins: 1,230 3rd Party Dig-in Ratio: 0.98
6. Gas In-Line Inspection	Total number of miles of inspections performed and percentage inspected by ILI.	461.5 miles inspected by ILI in 2023 out of a total of 6,386 miles of Transmission Lines which is equivalent to 7% inspected annually.
7. Gas in-Line Upgrade	Miles	60.8
8. Gas Shut-In Time – Mains	Time in minutes required to stop the flow of gas for Distribution Mains	EOY (Median): 80.0 EOY (Avg): 96.6
9. Gas Shut-In Time – Services	Time in minutes required to stop the flow of gas for Distribution Services	EOY (Median): 35.3 EOY (Avg): 45.4

Metric Name	Units	2023 Data
10. Cross Bore Intrusions	Number of cross bore intrusions per 1,000 inspections	Inspections Complete: 8,085 Cross Bores Found: 29 Find Rate: 3.59 per 1,000 inspections.
11. Gas Emergency Response Time	The time in minutes that a gas service representative or a qualified first responder takes to respond after receiving a call which results in an emergency order.	Median: 18.2 Average: 19.8
12. Natural Gas Storage Baseline Inspections Performed	Number of Assessments completed/Number scheduled or targeted	EOY Well Baseline Inspections: 21 EOY % Progress to Goal: 83%
13. Gas System Internal Inspection Status	Percentage	EOY System Piggability: 50.93% EOY Piggable Milage Total: 3,253
14. Employee Days Away, Restricted and Transfer (DART) Rate	DART Cases times 200,000 divided by employee hours worked	0.700 EOY
15. Rate of SIF Actual (Employee)	Number of SIF-Actual cases among employees x 200,000/employee hours worked	0.011 EOY
16. Rate of SIF Actual (Contractor)	Number of SIF-Actual cases among contractors x200,000/contractor hours worked	0.004 EOY
17. Rate of SIF Potential (Employee)	Number of SIF-Potential cases among employees x 200,000/employee hours worked	0.080 EOY
18. Rate of SIF Potential (Contractor)	Number of SIF-Potential cases among contractors x 200,000/contractor hours worked	0.110 EOY
19. Contractor Days Away, Restricted Transfer (DART)	OSHA DART Rate	0.290 EOY
20. Public Serious Injuries and Fatalities	Number of Serious Injuries and Fatalities	17
21. Helicopter/ Flight Accident or Incident	Number of accidents or incidents (as defined in 49 CFR Section 830.5 "Immediate Notification") per 100,000 flight hours.	Total Incidents: 0 Total number of flight hours per year for reporting the number of incidents per 100,000 flight hours: 29,508

Metric Name	Units	2023 Data
22. percentage of Serious Injury and Fatality Corrective Actions Completed on Time.	Total number of SIF corrective actions completed on time (as measured by the due date accepted by functional area Corrective Action Review Boards (CARB)) divided by the total number of SIF corrective actions past due or completed.	98%
23. Hard Brake Rate	Total number of hard braking events per thousand miles driven in a given period	0.3
24. Driver's Call Complaint Rate	Total number of driver complaint calls received per 1 million miles driven	4.6
25. Wires-Down not resulting in Automatic De-energization	Percentage of wires down occurrences	Distribution: 9.3% Transmission: 1.0%
26. Missed Inspections and Patrols for Electric Circuits	Percentage of structures that missed inspection relative to total required structures.	Distribution Patrols: 3.94% Distribution Inspections: 0.00% Transmission Patrols: 0.00% Transmission Inspection: 0.00%
27. Overhead Conductor Size in High Fire Threat District Tiers 2 and 3, HFTD	Percentage of primary distribution overhead conductors in Tiers 2 and 3 HFTD that is #6 copper (6Cu) relative to total circuit miles	10.49%
28. Gas Operation Corrective Actions Backlog	Percentage of work orders past due for completion in the past calendar year	Distribution Overdue Work Orders: 2,575 Total Work Orders: 13,397 EOY: 0.19 Transmission Overdue Work Orders: 4 Total Work Orders: 304 EOY: 0.01
29. GO-95 Corrective Actions (Tiers 2 and 3, HFTD)	Percentage of corrective actions completed	Distribution: 8% Transmission: 47% Vegetation Management: 98%
30. Gas Overpressure Events	Number of occurrences	Distribution: 3 Transmission: 2
31. Gas In-Line Inspections Missed	Number of Missed Inspections	Gas in-line inspections missed: 0

Metric Name	Units	2023 Data
32. Overhead Conductor Safety Index	Number of occurrences per 1,000 circuit miles	Total Events: 3,074 Total Events per 1,000 circuit miles: 31.23

**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**SECTION 2**  
**METRIC DATA EXAMPLES**

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **2023 SAFETY PERFORMANCE METRICS REPORT**  
3   **SECTION 2**  
4   **METRIC DATA EXAMPLES**

5 **II. Metric Data Examples** Prior to the SPMR, Pacific Gas and Electric Company  
6 (PG&E or the Company) tracked many of these metrics because they provide  
7 valuable insight on our safety performance. As required in Decision (D.) 19-04-020,  
8 PG&E provides three to five examples of how PG&E uses these metric data to  
9 (1) improve staff or contractor training and/or take corrective actions aimed at  
10 minimizing top risks or risk drivers; and (2) support risk-based decision-making.

11       a) Metric 1 – Wires Down: Informs Risk-Based Decision Making.

12                   Transmission and Distribution (T&D) Overhead Wires Down data is used  
13 to inform the Overhead Primary Deteriorated Conductor Replacement  
14 program. The program centralizes the prioritization, tracking, and funding of  
15 conductor replacement projects in non-high fire threat district (HFTD) areas  
16 and targets replacement of primary conductor segments with elevated wires  
17 down rates, especially small conductor and overlap of corrosion zones.

18                   The program is informed with the Wires Down Database which tracks  
19 high priority replacement attributes about the conductor (such as size, type,  
20 known splices, annealing, etc.) as well as environmental factors and risks  
21 (such as corrosion zone, snow loading zone, and HFTD). These attributes  
22 and factors are used to determine conductor replacement project initiation,  
23 justification, and priority, as well as to determine failure trends of types of  
24 conductors and environmental factors, that may increase asset health  
25 deterioration. The Overhead Primary Deteriorated Conductor Replacement  
26 Program targets areas with the greatest public safety consequence, high  
27 priority replacement attributes, and areas experiencing repeat Wires Down  
28 events.

29       b) Metric 3 – Electric Emergency Response Time: Corrective Action/Training.

30                   In 2023, performance data for PG&Es Electric Emergency Responses  
31 were reviewed as part of its daily operation review cadence. If any individual  
32 responses are below target, they are investigated for understanding and  
33 potential tactic adjustment. With significant weather events providing the



1 greatest challenge to universal timely electric emergency response, gas  
2 construction resources were added to the population of trained electric  
3 emergency standby resources. This helped PG&E staff more locations with  
4 a denser amount of standby personnel before significant events. As an  
5 additional step, consultation with PG&E's Meteorology experts in advance of  
6 scheduling emergency standby resources in 2023 helped to better pinpoint  
7 the location and timing of incoming wind.

8 c) Metric 4 – Fire Ignitions: Informs Risk-Based Decision Making.

9 PG&E started cataloging reportable ignition data in June 2014 per our  
10 Fire Incident Data Collection Plan (RISK-6306S) and has used the data to  
11 gauge performance and drive data-driven wildfire risk reduction strategies.

12 Through maturation of the Enhanced Powerline Safety Settings (EPSS)  
13 Program and widespread deployment of high-impedance fault detection  
14 technology like Downed Conductor Detection (DCD), PG&E finished 2023  
15 with 64 CPUC reportable ignitions in HFTD attributable to PG&E assets.  
16 These results show approximately 49 percent reduction from the 2020 to  
17 2022 annual average of 125 ignitions. More importantly, PG&E reduced the  
18 overall risk associated with these 64 ignitions by focusing our efforts to  
19 eliminate ignitions during the conditions that pose the greatest risk of starting  
20 a catastrophic wildfire. PG&E reduced the count of ignitions where the Fire  
21 Potential Index was in Fire Potential Index (FPI) R3 conditions or greater for  
22 that geospatial and temporal location from 75 ignitions, based on previous  
23 year averages, to 27 ignitions in 2023. PG&E can expect to see improved  
24 performance on this metric through continual execution of the Wildfire  
25 Mitigation Plan and maturation of key wildfire mitigation strategies, including:

- 26 • Maturation of the EPSS Program;
- 27 • Public Safety Power Shutoff; and
- 28 • System hardening inclusive of undergrounding.

29 d) Metric 14 – Employee Days Away, Restricted and Transfer (DART):

30 Corrective Action and Informs Risk-Based Decision Making.

31 PG&E program efforts are designed to address employee safety, which  
32 was informed by the Employee Lost Work Day (LWD), and Employee DART  
33 Rate metrics. These program efforts include expanding PG&E's ergonomic  
34 programs and increasing the number of Industrial Athlete Specialists for job

1 site evaluations. A primary goal of the efforts is reduced injury severity  
2 through injury prevention and early intervention care for employees. In  
3 alignment with this, we have strengthened the identification of the highest  
4 risk work groups and tasks for field and vehicle ergonomic injuries. We  
5 identify high risk computer users through predictive modeling and provide  
6 targeted interventions. Additional efforts also include enhanced injury  
7 management containment for injuries at risk for escalation to DART and  
8 providing our people leaders with additional injury management training.  
9 This metric remains in effect and continues to be monitored.

10 e) Metric 15 – Employee SIF and Metric 20 – Public SIF: Motor Vehicle Safety  
11 Corrective Action and Informs Risk Informed Decision Making.

12 PG&E uses cause analysis of SIFs to develop mitigations designed to  
13 improve these safety metrics. For example, use of mobile devices while  
14 driving is one of the potential causes of employee motor vehicle related SIFs.  
15 As a follow-up to the three-month pilot on the cell phone blocking technology  
16 conducted in 2021, the cell blocking program is now in use with  
17 approximately 2,000 active users and has effectively suppressed over  
18 335,000 texts and over 83,000 calls in 2023.

19 f) Metric 24 – Drivers Complaint Rate: Corrective Action/Improved Training.

20 The Drivers Complaint Rate metric data is used to inform the Drivers  
21 Scorecard, which provides leaders a continuous review of the drivers'  
22 preventative motor vehicle incidents (PMVI), and call Complaints, and sets  
23 limits when action needs to be taken. The scorecard also includes a motor  
24 vehicle training details status report and any additional training needs based  
25 on employee PMVI status. This scorecard is designed to provide employees  
26 with timely coaching and to reduce overall Motor Vehicle Safety Incident risk.  
27 The scorecard was rolled out in mid-2021 enterprise-wide, with a dashboard  
28 for leaders to access a single source containing multiple data points related  
29 to driver/vehicle risk.

30 g) Metric 16 – Contractor SIF: Corrective Action/Improved Training and Informs  
31 Risk-Based Decision Making.

32 To improve this safety metric, in late 2022, PG&E began facilitating  
33 Contractor Safety Quality Assurance Reviews (CSQAR) with selected  
34 Contractors with adverse trends in safety performance and who are at risk of

1 experiencing a Serious Injury or Fatality. Initially, the focus is on Contractors  
2 with high incident counts, at-risk finding rates, and hours worked.

3 A CSQAR is a detailed assessment of the Contractor's safety program  
4 implementation and field safety performance. PG&E partners with the  
5 Contractors on the CSQAR process, which includes a desktop review, safety  
6 culture survey, barrier analysis, and leadership engagement with a focus on  
7 the elimination of serious injuries and fatalities. Safety concerns or issues  
8 identified are documented and a safety improvement plan for compliance and  
9 mitigation, as well as any additional training needs, is established by the  
10 Contractor. Once PG&E accepts the safety improvement plan, PG&E and  
11 the Contractor will participate in a documented Effectiveness Review to  
12 validate its implementation and effectiveness.

13 Contractor Safety Quality Assurance Reviews (CSQAR) were completed  
14 in 2023 with the identified top at-risk contract companies. All contract  
15 companies were active and positive participants and 77 percent of these  
16 contract companies did not experience a SIF throughout the remaining 2023.

17 h) Metrics 15 through 18 – Employee SIF Actual, Contractor SIF Actual,  
18 Employee SIF Potential, and Contractor SIF Potential Inform Risk-Based  
19 Decision Making for the 2024 RAMP analysis.

20 The SIF actual and potential metrics for the employee and contractor  
21 workforce support implementation of the SIF Capacity & Learning Model  
22 which is aligned with the Edison Electric Institute (EEI) Safety Classification  
23 and Learning model to inform risk-based decision making for both the  
24 Employee Safety Incident and Contractor Safety Incident risks. In addition,  
25 the metrics have been incorporated into the risk RAMP model analyses and  
26 inform health and safety program effectiveness.

27 i) Metric 11 – Gas Emergency Response; Metric 30 – Gas Overpressure  
28 Events: Corrective Action/Improved Training

29 In 2023, Gas continued the journey of Process Safety Management  
30 maturity. The Process Safety Indicator (PSI) dashboard, based on a pyramid  
31 framework, is reviewed monthly at Gas Safety Excellence and Process  
32 Safety Progress Meetings and other senior leadership platforms. This  
33 includes review of relevant metrics, including Safety Performance Metrics  
34 such as gas dig-ins, shut in the gas average time, cross bore intrusions, and

1 gas emergency response. Gas continued to be compliant, per a third-party  
2 assessment, with the intent of API RP754, Process Safety Performance  
3 Indicators, demonstrating a commitment to incident prevention.

4 The metrics alignment framework helps to drive ownership and  
5 accountability to ensure leading indicators are acted upon to prevent a major  
6 gas incident that can lead to serious injuries, fatalities, or cause significant  
7 interruption to the gas business. These metrics continue to be evaluated  
8 during Daily Operating Reviews (DORs or huddles) to ensure that Gas drives  
9 the appropriate continuous improvement conversations.

10 The dashboard was expanded to be presented at the Quality and  
11 Process Improvement Committee (QPIC). Updates to align each of the  
12 metrics to the correct Mega Process also took place, ensuring ownership and  
13 accountability.

14 j) Metric 5 – Gas Dig-In: Corrective Action and Informs Risk-Based Decision  
15 Making

16 Analysis of Third-Party at Fault dig-ins revealed that 59 percent of the  
17 events occurred without an 811 ticket. This issue continues to be a  
18 challenge because no statutory requirements beyond civil penalties exists,  
19 and homeowners are exempt from the requirement to call 811. The Damage  
20 Prevention Organization continues to explore additional opportunities to  
21 mitigate these challenges. Identifying top dig-in contributors and questioning  
22 those offenders has provided additional risk mitigation opportunities as listed  
23 below:

- 24 • Conducted third-party safe excavation workshops (delivered to  
25 contractors by Dig-In Reduction Team and Locate and Mark);
- 26 • Each contractor involved in a dig-in was offered a free safe excavation  
27 workshop with a focus on plumbing and fencing;
- 28 • In 2023, third-party workshops and second-party at-fault reviews were  
29 just some of the efforts that contributed towards:
  - 30 – Locator At Faults were down 38 percent compared to 2022;
  - 31 – Total Dig-ins were down 14 percent compared to 2022;
  - 32 – Second-Party Dig-ins were down 52 percent compared to 2022;
  - 33 – Third-Party Dig-ins were down 11 percent compared to 2022;

1           – PG&E achieved 1st Quartile for total dig-in, ending the year with a  
2           ratio of 1.01; and

- 3           • No Underground Service Alert (USA) Ticket: social media-Next Door  
4           Posts, reviewed by zip code and compared to same quarter prior year.

5 k) Metric 9 – Shut in Times – Services: Corrective Action/Improved Training

6           As a result of our Continuous Improvement initiatives and with focus on  
7           customer and employee safety, we explored alternatives to improve overall  
8           response and gas flow stop times when responding to distribution facility  
9           damages, including services.

10           Analysis of 2022 service shut-in data indicated that when First  
11           Responders (Field Services Personnel – Gas Service Representatives or  
12           GSRs) can squeeze services there is a 47 percent improvement in overall  
13           gas flow stop median times compared to when Maintenance and  
14           Construction (M&C) crews complete same task. Despite small sample size  
15           of 34 incidents with Squeezed By details, analysis indicated the median time  
16           to stop the flow of gas by GSRs was 26.9 minutes compared to 51.3 minutes  
17           for M&C.

18           Therefore, for 2023, PG&E emphasized the importance of providing  
19           GSRs with service squeeze training to improve overall performance.

20           From a total of 1,273 service damages responded to in 2023:

- 21           • GSRs squeezed 654 (51%) with a median time of 27.4 minutes
- 22           • M&C squeezed 562 (44%) with a median time of 53.1 minutes

23 l) Metric 11 – Gas Emergency Response: Informs Risk-Based Decision Making

24           Gas Emergency Response measures PG&E’s ability to respond with  
25           urgency to hazardous or unsafe situations that may be a threat to customer  
26           and public safety. In some situations, GSRs respond to emergency  
27           situations as first responders. Responding to emergency situations is  
28           PG&E’s highest priority so that PG&E can prevent or ameliorate hazardous  
29           situations. PG&E’s goal is to have a GSR on-site as quickly as possible for  
30           gas immediate response calls. Faster response time to Emergency  
31           Notifications reduces the length of emergent situations. Consistent with  
32           current practice, PG&E treats all customer-reported gas odor calls as  
33           Immediate Response (IR) and will attempt to respond to such calls within 60  
34           minutes. To meet this goal, PG&E utilizes best practices, such as: mobile

1 data terminals, real time Global Positioning Systems, shift coverage 24 hours  
2 a day/seven days a week in specific high-volume areas, and backup on-call  
3 technicians. In 2023, we achieved the highest response time in 8 years and  
4 was made possible by continued focus by our Field Teams and Gas Dispatch  
5 deploying Lean practices, cross collaboration, accountability, focus on  
6 problem solving and initiatives.

7 m) Metric 30 – Gas Over Pressure Events: Informs Risk-Based Decision Making

8 By reviewing Gas Over Pressure Events metric data PG&E has identified  
9 human performance and equipment failure as the two most common causes  
10 for Overpressure events. As result of benchmarking with other utilities and in  
11 alignment with our internal strategic objectives, PG&E presented the Over  
12 Pressure Protection (OPP) Enhancement Program in the 2019 Gas  
13 Transmission and Storage Rate Case, and in both the 2020 and 2023  
14 General Rate Case testimony. By end of 2023, the slam shut valve  
15 installation program (a method of secondary OPP) has installed slam shut  
16 devices at 939 gas distribution stations and 97 gas transmission stations.

17 n) Metric 30 – Gas Over Pressure Events: Corrective Action/Improved  
18 Training.

19 By reviewing Gas Over Pressure Events metric data PG&E has identified  
20 human performance and equipment failure as the two most common causes  
21 for over pressure events. In 2018, PG&E implemented the HU (Human  
22 Performance) Tools and Capability Training series that consisted of  
23 capability building activities with the goal to reduce over pressure events  
24 linked to HU causes. In 2021, 100 percent of supervisors and grassroots  
25 leads were trained. In 2022, PG&E evaluated the clearance process to  
26 determine gaps and improve clearance writing and execution methodology to  
27 prevent over pressure events, and in 2023 a full-time person was assigned to  
28 lead the initiative to improve the development and execution of the clearance  
29 process.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**SECTION 3**  
**BIAS CONTROLS AND METHODOLOGY**

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **2023 SAFETY PERFORMANCE METRICS REPORT**  
3   **SECTION 3**  
4                                   **BIAS CONTROLS AND METHODOLOGY**

5 **I. Bias Controls and Methodology**

6           In general, Pacific Gas and Electric Company (PG&E) utilizes multiple bias  
7 controls and systems to ensure reporting of the metric data cannot be  
8 manipulated or skewed. These controls include:

- 9       • Internal and external auditing;
- 10      • Use of third-party data collection and resources;
- 11      • Use of state mandated reporting to safety regulators such as the  
12       Occupational Safety and Health Administration;
- 13      • Reliance on automated processes such as the Supervisory Control and  
14       Data Acquisition system that actively monitor our gas equipment;
- 15      • Use of database systems such as the Energy Management tool and SAP for  
16       accurate data input;
- 17      • Use of automatically generated change logs for every notification down to  
18       the field-by-field basis to ensure integrity of system controls and retention of  
19       record history;
- 20      • Ensuring that only specific personnel or teams can enter or edit data such  
21       as the Centralized Inspection Review Team;
- 22      • Review of the data by the process team to ensure accuracy;
- 23      • Review of many of the metrics included in this report by Business, Process,  
24       Governance teams, and leadership to discuss performance and take action;  
25       and
- 26      • Regular review by PG&E’s Internal Audit and Law Department of many of  
27       the metrics identified in this report.

28           PG&E has provided a description of the specific bias controls applicable to  
29 each metric in the bias control section within the metric discussion.

30 Individual or Group Performance Tied to Metrics

31           PG&E sets goals annually for employees in our goals system iConnect, that  
32 cascade throughout each Functional Area. For a given year:

33 1) Senior Leaders identify the most significant areas of focus:



1        2) Senior Leaders set high level goals (e.g., Short-Term Incentive Plan metrics)  
2            and provide direction on other areas of focus;

3        3) Goal setting is disaggregated and managed within the Functional Area

4        4) Downstream leaders set operational goals to meet objectives; and

5        5) Goal setting is managed locally.

6            For this report, to determine if a metric is tied to a specific goal PG&E  
7        reviewed all available 2023 goals and metrics for Officers and Directors for the  
8        Enterprise. PG&E met this requirement by searching all Functional Area goals  
9        for each Safety Performance Metrics Report (SPMR) metric name and identified  
10       the officers and Directors with performance goals that are tied to each SPMR  
11       metric.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**SECTION 4**  
**2023 IMPUTED ADOPTED VALUES FOR**  
**SAFETY-RELATED RISK MITIGATION AND CONTROLS**  
**ACTIVITIES**

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **2023 SAFETY PERFORMANCE METRICS REPORT**  
3   **SECTION 4**  
4                                   **2023 IMPUTED ADOPTED VALUES FOR**  
5                                   **SAFETY-RELATED RISK MITIGATION AND CONTROLS ACTIVITIES**

6 **IV. 2023 Imputed Adopted Values for Safety-Related and Risk Mitigation and**  
7 **Controls Activities**

8           The total estimated risk mitigation and control spending level as adopted in  
9           the 2023 General Rate Case (GRC) for 2023 and the recorded spend is  
10          provided in Tables 4-1 (expense) and 4-2 (capital) below. Please refer to Pacific  
11          Gas and Electric Company's (PG&E or the Company) 2023 Risk Spending  
12          Accountability Report (RSAR) that will include additional detail on activities  
13          presented in PG&E's 2020 Risk Assessment and Mitigation Phase (RAMP)  
14          Report and 2023 GRC, including variance explanations for those  
15          activities/programs that meet the California Public Utilities Commission's  
16          variance criteria threshold.

**TABLE 4-1**  
**2023 TOTAL SAFETY-RELATED RISK MITIGATION AND CONTROLS IMPUTED ADOPTED**  
**VALUES AND RECORDED COSTS EXPENSE**  
**(THOUSANDS OF DOLLARS)**

Line No.	Functional Area	2023 Imputed Adopted Costs	2023 Actual Costs	Difference for 2023 (\$)	Spending percent Variance for 2023 (%)
1	Gas Distribution	\$438,691.6	\$349,820.6	\$(88,871.0)	(20.3)%
2	Gas Transmission and Storage (GT&S)	525,468.7	448,261.0	(77,207.6)	(14.7)%
3	Electric Distribution	2,168,752.6	2,137,797.1	(30,955.5)	(1.4)%
4	Nuclear Generation	312,572.5	322,033.6	(9,461.07)	(3.0)%
5	Power Generation	239,373.0	200,226.5	39,146.52	16.4%
6	Customer and Communications	54,319.9	49,455.3	(4,864.5)	(9.0)%
7	Shared Services/ Information Technology (IT)	151,398.96	206,946.20	(55,547.25)	(37)%
8	Human Resources (HR)	40,427.0	32,021.5	(8,406.0)	(21)%
9	Total	\$3,931,004.26	\$3,745,561.80	\$(184,442.46)	(4.69)%

Note: This table is comprised of all Major Work Categories (MWC) or Maintenance Activity Types (MAT) that are related to safety -related risk mitigation activities included in the 2023 GRC.

- (1) The Enterprise, Health & Safety (EH&S) imputed adopted and actual costs reflect department costs only. Occupational Health adopted and actual costs are included in Corporate Items at a much higher level of detail for consistency at the Company level.
- (2) Safety, Reliability, and/or Maintenance (SRM) spend in several Shared Service organizations (Transportation & Aviation Services, Sourcing, Corporate Real Estate Strategy and Services (CRESS), and Land & Environmental Management) include investments that support Wildfire mitigations and are recorded in the Wildfire Mitigation Balancing Account, Wildfire Mitigation Plan Memorandum Account (WMPMA), and Fire Risk Mitigation Memorandum Account.
- (3) SRM spend in the CRESS organization also includes investments addressing the move from the San Francisco General Office (SFGO) to the new Oakland General Office (OGO), and are recorded in the General Office Sale Memorandum Account (GOSMA).

**TABLE 4-2**  
**2023 TOTAL SAFETY-RELATED RISK MITIGATION AND CONTROLS**  
**IMPUTED ADOPTED VALUES AND RECORDED COSTS CAPITAL**  
**(THOUSANDS OF DOLLARS)**

Line No.	Functional Area	2023 Imputed Adopted Costs	2023 Actual Costs	Difference for 2023 (\$)	Spending percent Variance for 2023 (%)
1	Gas Distribution	\$776,084.9	\$785,826.6	\$9,741.6	1.3%
2	GT&S	787,305.5	658,440.0	(128,865.5)	(16.4)%
3	Electric Distribution	2,727,103.2	3,319,414.7	592,311.5	21.7%
4	Nuclear Generation	12,314.0	11,014.4	1,299.59	10.6%
5	Power Generation	368,112.2	280,236.1	87,876.09	23.9%
6	Customer and Communications	111,413.5	102,788.9	(8,624.6)	(7.7)%
7	Shared Services/IT	478,137.54	421,515.22	56,622.31	12%
8	HR	1,102.4	539.1	(563.3)	(51)%
9	Total	\$5,261,573.24	\$5,579,775.02	\$318,201.73	6.05%

Note: This table is comprised of all MWCs or MATs that are related to safety-related risk mitigation activities included in the 2023 GRC.

- (1) The EH&S imputed adopted and actual costs reflect department costs only. Occupational Health adopted and actual costs are included in Corporate Items at a much higher level of detail for consistency at the Company level.
- (2) SRM spend in CRESS include investments that support Wildfire mitigations and are recorded in the WMPMA.
- (3) SRM spend in the CRESS organization also includes investments addressing the move from the SFGO to the new OGO and are recorded in the GOSMA.

1 In response to SPD's request, PG&E provides the total 2023 GRC risk  
2 spend for 2023 broken down by RAMP chapter in Tables 4-3 (expense) and 4-4  
3 (capital). PG&E's 2023 RSAR, to be submitted May 31, 2024, will identify all  
4 programs that have SRM activities. The 2023 RSAR will present risk spending  
5 using the organization of risks presented in the 2020 RAMP and will also  
6 separately identify SRM costs that were not directly in the 2020 RAMP.

**TABLE 4-3**  
**2023 TOTAL SAFETY-RELATED RISK MITIGATION**  
**IMPUTED ADOPTED VALUES AND RECORDED COSTS BY RAMP CHAPTER EXPENSE**  
**(THOUSANDS OF DOLLARS)**

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2023 Imputed Adopted Costs	2023 Actual Costs	Difference for 2023 (\$)	Spending percent Variance for 2023 (%)
1	Gas	7	3	Loss of Containment on Gas Transmission Pipeline	\$399,441.7	\$325,547.0	\$(73,546.4)	(2)%
2	Gas	8	3	Loss of Containment on Gas Distribution Main or Service	\$296,256.3	\$240,745.2	\$(55,511.1)	(2)%
3	Gas	9	3	Large Overpressure Event Downstream of Gas Maintenance and Construction (M&C) Facility	\$63,538.9	\$56,626.2	\$(6,912.7)	(1)%
4	Gas	19	3	Loss of Containment at Gas M&C or Compression and Processing (C&P) Facility	\$107,678.8	\$97,610.0	\$(10,068.7)	(1)%
5	Gas	19	3	Loss of Containment on Gas Customer Connected Equipment	\$114,831.5	\$83,029.1	\$(31,802.5)	(3)%
6	Gas	19	3	Loss of Containment at Natural Gas Storage Well or Reservoir	\$41,661.5	\$28,939.2	\$(12,722.2)	(3)%
7	Gas	19	3	Loss of Containment on Liquid Natural Gas (LNG)/Compressed Natural Gas (CNG) Portable Equipment	\$2,650.8	\$3,617.0	\$966.2	(4)%
8	Gas	19	3	Loss of Containment on CNG Station Equipment	\$4,592.7	\$3,453.7	\$(1,139.0)	(2)%
9	Gas	Not in 2020 RAMP	3	Insufficient Capacity to Meet Customer Demand	\$41,172.8	\$30,304.0	\$(10,868.8)	(3)%
10	Gas	Not in 2020 RAMP	3	N/A	\$88,402.3	\$101,449.9	\$13,047.6	1%

**TABLE 4-3**  
**2023 TOTAL SAFETY-RELATED RISK MITIGATION**  
**IMPUTED ADOPTED VALUES AND RECORDED COSTS BY RAMP CHAPTER EXPENSE**  
**(THOUSANDS OF DOLLARS)**  
**(CONTINUED)**

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2023 Imputed Adopted Costs	2023 Actual Costs	Difference for 2023 (\$)	Spending percent Variance for 2023 (%)
11	Electric	10	4	Wildfire	\$1,729,305.4	\$1,622,835.4	\$(106,469)	(6)%
12	Electric	11	4	Failure of Distribution Overhead Assets	\$1,191,918.7	\$1,209,855.3	\$17,396.5	2%
13	Electric	12	4	Failure of Distribution Network Assets	\$5,157.3	\$6,152.8	\$995.5	19%
14	Electric	19	4	Failure of Distribution Underground Assets	\$36,997.7	\$35,311.6	\$(1,686.1)	(5)%
15	Electric	19	4	Failure of Substation Assets	\$24,889.4	\$31,061.4	\$6,162.0	25%
16	Electric	20	4	Cross-Cutting Factors – Emergency Preparedness and Response	\$27,969.5	\$20,541.0	\$(7,428.5)	(27)%
17	Electric	Not in 2020 RAMP	4	N/A	\$191,829.5	\$267,062.6	\$75,233.0	39%
18	Power Generation	13	5	Hydro System Safety – Dams	\$19,147.9	\$12,962.1	\$6,185.8	32.3%
19	Power Generation	Not in RAMP	5	N/A	\$220,225.1	\$187,264.4	\$32,960.7	15.0%
20	Nuclear Generation	Not in RAMP	5	N/A	\$312,572.5	\$322,033.6	\$(9,461.1)	(3.0)%
21	Customer and Comms	Not in RAMP	6	N/A	\$54,319.9	\$49,455.3	\$(4,864.5)	(9.0)%
22	HR	Not in RAMP	8	N/A	\$40,427.0	\$32,080.8	\$(8,346.3)	(21)%
23	EH&S	15, 16, 17, 18	7	Multiple	\$38,433.57	\$38,023.02	\$410.56	1%
24	Transportation & Aviation Services	Not in RAMP	7	N/A	\$5,891.90	\$4,702.15	\$1,189.75	20%
25	Sourcing	Not in RAMP	7	N/A	–	\$3,930.46	\$(3,930.46)	–
26	CRESS	14	7	Real Estate and Facilities Failure	\$46,632.64	\$62,979.91	\$(16,347.26)	(35)%
27	Land & Environmental Management	Not in RAMP	7	N/A	\$2,367.95	\$2,992.22	\$(624.27)	(26)%
28	ERIM	20	7	Cross-Cutting Factors	\$551.19	\$421.95	\$129.24	23%
29	Cyber and Corporate Security	20	7	Cross-Cutting Factors	\$57,521.70	\$55,055.03	\$2,466.68	4%
30	IT	20	7	Cross-Cutting Factors	–	\$38,841.47	\$(38,841.47)	–

**TABLE 4-4**  
**2023 TOTAL SAFETY-RELATED RISK MITIGATION IMPUTED ADOPTED VALUES AND**  
**RECORDED COSTS BY RAMP CHAPTER CAPITAL**  
**(THOUSANDS OF DOLLARS)**

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2023 Imputed Adopted Costs	2023 Actual Costs	Difference for 2023 (\$)	Spending percent Variance for 2023 (%)
1	Gas	7	3	Loss of Containment on Gas Transmission Pipeline	\$480,469.6	\$368,401.1	\$(112,068.5)	(2)%
2	Gas	8	3	Loss of Containment on Gas Distribution Main or Service	\$665,801.5	\$647,663.0	\$(18,138.5)	–
3	Gas	9	3	Large Overpressure Event Downstream of Gas M&C Facility	\$147,896.1	\$178,792.6	\$30,896.4	2%
4	Gas	19	3	Loss of Containment at Gas M&C or C&P Facility	\$291,995.6	\$223,748.0	\$(68,247.6)	(2)%
5	Gas	19	3	Loss of Containment on Gas Customer Connected Equipment	\$2,476.4	\$10,418.5	\$7,942.1	32%
6	Gas	19	3	Loss of Containment at Natural Gas Storage Well or Reservoir	\$93,448.7	\$125,593.8	\$32,145.1	3%
7	Gas	19	3	Loss of Containment on LNG/CNG Portable Equipment	\$4,489.5	\$5,781.0	\$1,291.5	3%
8	Gas	19	3	Loss of Containment on CNG Station Equipment	\$4,889.5	\$3,489.7	\$(1,399.8)	(3)%
9	Gas	Not in 2020 RAMP	3	Insufficient Capacity to Meet Customer Demand	\$53,208.8	\$60,803.2	\$7,594.4	1%
10	Gas	Not in 2020 RAMP	3	N/A	\$999.1	\$6,004.1	\$5,005.0	50%
11	Electric	10	4	Wildfire	\$1,470,524	\$1,995,511.1	\$524,987.6	36%
12	Electric	11	4	Failure of Distribution Overhead Assets	\$1,435,514	\$1,797,224.4	\$361,710.2	25%
13	Electric	12	4	Failure of Distribution Network Assets	\$46,335	\$22,397	\$(23,939)	(52)%



**TABLE 4-4**  
**2023 TOTAL SAFETY-RELATED RISK MITIGATION IMPUTED ADOPTED VALUES AND**  
**RECORDED COSTS BY RAMP CHAPTER CAPITAL**  
**(THOUSANDS OF DOLLARS)**  
**(CONTINUED)**

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2023 Imputed Adopted Costs	2023 Actual Costs	Difference for 2023 (\$)	Spending percent Variance for 2023 (%)
14	Electric	19	4	Failure of Distribution Underground Assets	\$161,068	\$117,800	\$(43,268)	(27)%
15	Electric	19	4	Failure of Substation Assets	\$131,265	\$80,947	\$(50,318)	(38)%
16	Electric	20	4	Cross-Cutting Factors – Emergency Preparedness and Response	5,932	4,596	(1,336)	(23)%
17	Electric	Not in 2020 RAMP	4	N/A	776,589	1,004,085	227,496	29%
18	Power Generation	13	5	Hydro System Safety – Dams	\$123,123.2	\$42,834.2	\$80,289.0	65.2%
19	Power Generation	Not in RAMP	5	N/A	\$244,989.1	\$237,402.0	\$7,587.1	3.1%
20	Nuclear Generation	Not in RAMP	5	N/A	\$12,314.0	\$11,014.4	\$1,299.6	10.6%
21	Customer and Comms	Not in RAMP	6	N/A	\$111,413.5	\$102,788.9	\$(8,624.6)	(7.7)%
22	HR	Not in RAMP	8	N/A	\$1,102.4	\$539.1	\$(563.3)	(51)%
23	CRESS	14	7	Real Estate and Facilities Failure	\$140,796.84	\$127,869.04	\$12,927.79	9%
23	ERIM	20	7	Cross-Cutting Factors	\$2,204.76	\$4,891.23	\$(2,686.47)	(122)%
24	Cyber and Corporate Security	20	7	Cross-Cutting Factors	\$47,524.75	\$43,233.94	\$4,290.81	9%
25	IT	20	7	20: Cross-Cutting Factors	\$286,508.81	\$245,521.02	\$40,987.80	14%
26	EH&S	15, 16, 17, 18	7	Third-Party Safety Incident Employee Safety Incident Contractor Safety Incident Motor Vehicle Safety Incident	\$1,102.38	–	–	0%

Note: These values may not align with PG&E's final 2023 RSAR since the 2023 RSAR will be submitted on May 31, 2024, after the submission of this report. All values are from the 2020 RAMP as updated in the 2023 GRC. Values should not be totaled. Some costs mitigate multiple risks and therefore are reflected in more than one 2020 RAMP chapter (e.g., double counted due to the nature of how mitigation activities function).

(a) Activities in this category are related to wildfire.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**SECTION 5**  
**SAFETY PERFORMANCE METRICS**

1                                   **PACIFIC GAS AND ELECTRIC COMPANY**  
2                                   **2023 SAFETY PERFORMANCE METRICS REPORT**  
3   **SECTION 5**  
4                                   **SAFETY PERFORMANCE METRICS**

5   **V. Safety Performance Metrics**

6       **Metric 1: T&D Overhead Wires Down Non-Major Event Days**

7       **Metric Name and Description:** T&D Overhead Wires Down Non-Major Event  
8       Days – Number of instances where an electric transmission or primary  
9       distribution conductor is broken, or remains intact, and falls from its intended  
10      position to rest on the ground or a foreign object; a conductor is considered  
11      energized unless confirmed in an idle state (i.e., de-energized); excludes down  
12      secondary distribution wires and “Major Event Days” (MED) (typically due to  
13      severe storm events) as defined by the Institute of Electrical and Electronics  
14      Engineers (IEEE) Standard 1366.

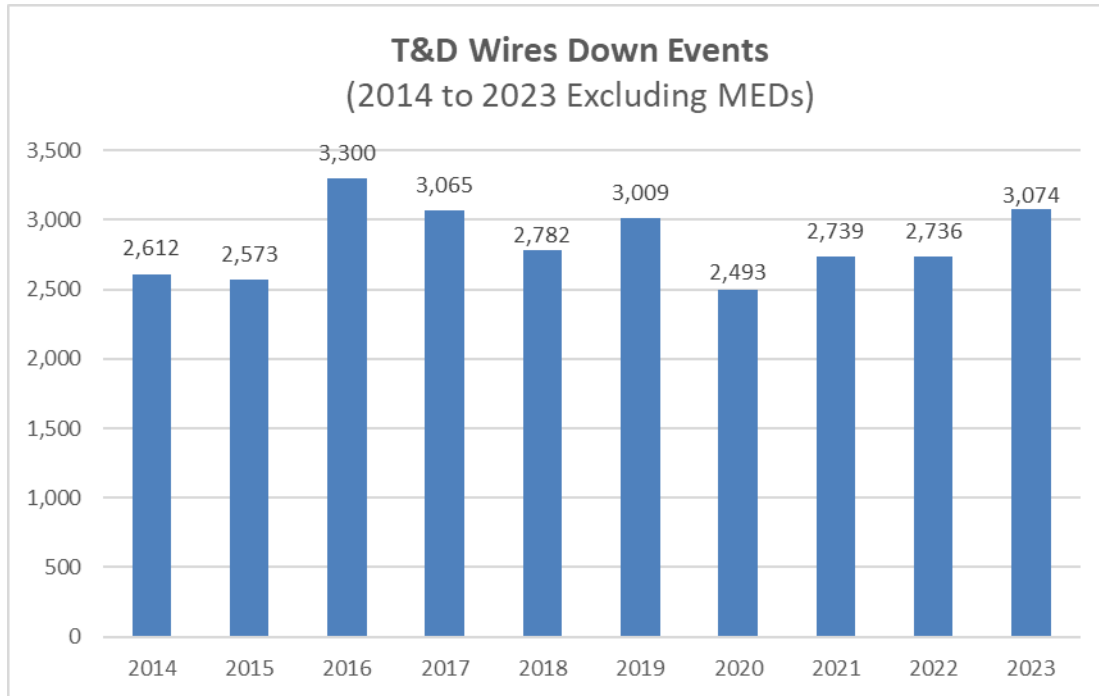
15      **Risks:** Wildfire, Failure of Electric Transmission Overhead Assets, and Failure  
16      of Electric Distribution Overhead Assets

17      **Category:** Electric

18      **Units:** Number of wire down events

1 **Summary:**

**FIGURE 5-1  
T&D OVERHEAD WIRES DOWN METRIC DATA EXCLUDING MEDS (ANNUAL)**



**Historical Number of MEDs**

2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
5	10	3	30	7	31	14	25	5	20

Note: The data in this figure is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

2 **Narrative Context:** In 2012, PG&E initiated the Wires Down Program (including  
 3 introduction of the wires down metric) to address the Company's increased  
 4 focus on public safety by reducing the number of conductors that fail and result  
 5 in a contact with the ground, a vehicle, or other object. Before 2012, wires down  
 6 data was collected in the OUTAGE and ESLIC databases but not tracked or  
 7 used as a metric. As part of the Wires Down Program, in an effort to identify and  
 8 mitigate the root cause of wires down incidents, Electric Operations  
 9 implemented a program to visit wires down locations to gather essential data,  
 10 understand the cause, and develop work plans to mitigate future wires down  
 11 incidents.

1 Significant work has been performed to reduce wires down, including  
2 replacing overhead conductors, vegetation clearing, hardening of distribution  
3 circuits, infrared inspections of overhead lines to identify and repair hot spots,  
4 and investigating wire down incidents and implementing learnings/corrective  
5 actions.

6 PG&E's Vegetation Management team conducts site visits of  
7 vegetation-caused wires-down events as part of its standard tree-caused service  
8 interruption investigation process. The data obtained from site visits supports  
9 efforts to reduce future vegetation-caused wires-down events. The data  
10 collected from these investigations also helps identify failure patterns by tree  
11 species that are associated with wires-down events.

12 2023 experienced 3,074 wire down events compared to 2,736 in 2022, a  
13 12 percent increase. 2023 performance was not in line with the 10-year  
14 historical average of 2,838 due to the historical atmospheric river weather events  
15 incurred in Q1 2023. Improvements have been made to the wires down forecast  
16 model to include weather day and non-weather day information to better  
17 understand events not related to weather. This provided better insights to blue  
18 sky day conductor performance and improved forecasting performance.

19 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
20 **or Higher) Compensation Levels and/or Incentives?**

21 No, in 2023, T&D Overhead Wires Down Non-Major Event Days is not a  
22 STIP metric.

23 **Is Metric Linked to the Determination of Individual or Group Performance**  
24 **Goals?**

25 No, T&D Overhead Wires Down is not linked to 2023 individual or group  
26 performance goals for Director-level, or higher, positions.

27 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

28 No, T&D Overhead Wires Down is not linked to 2023 individual performance  
29 goals for Director-level, or higher, positions.

30 **Bias Controls:** Internal Auditing performed a validation of the 2023 metric  
31 performance. The wires down events are reported by field and control center  
32 personnel per uniform reporting guidelines as the events occur.

- 1 • Engineers conduct post wire down event reviews (typically for the non-MED  
2 events) and will initiate corrections to the data via the outage quality team to  
3 ensure the reporting guidelines were followed and the records align with  
4 information reported by repair crews.
- 5 • The outage quality team processes all valid change requests received and  
6 also initiates corrections based on their reviews and findings of the collected  
7 outage information.

8 **Rate Case Safety Goal Progress:** The T&D Wires Down metric (excluding  
9 downed secondary distribution wires and MEDs) is not a 2023 GRC or 2020  
10 RAMP stated safety goal.

11 Significant work was performed to reduce wires down, including replacing  
12 overhead conductor, vegetation clearing, hardening of distribution circuits,  
13 infrared inspections of overhead lines to identify and repair hot spots,  
14 investigating wires down incidents, and implementing learnings/corrective  
15 actions.

16 **Monthly Data:** See Attachment A at the end of this report.

1       **Metric 2: Transmission and Distribution (T&D) Overhead Wires Down –**  
2       **Major Event Days (MED)**

3       **Metric Name and Description:** T&D Overhead Wires Down – MEDs – Number  
4       of instances where an electric transmission or primary distribution conductor is  
5       broken, or remains intact, and falls from its intended position to rest on the  
6       ground or a foreign object; a conductor is considered energized unless  
7       confirmed in an idle state (i.e., de-energized). Includes MEDs (typically due to  
8       severe storm events) as defined by the Institute of Electrical and Electronics  
9       Engineers (IEEE) Standard 1366.

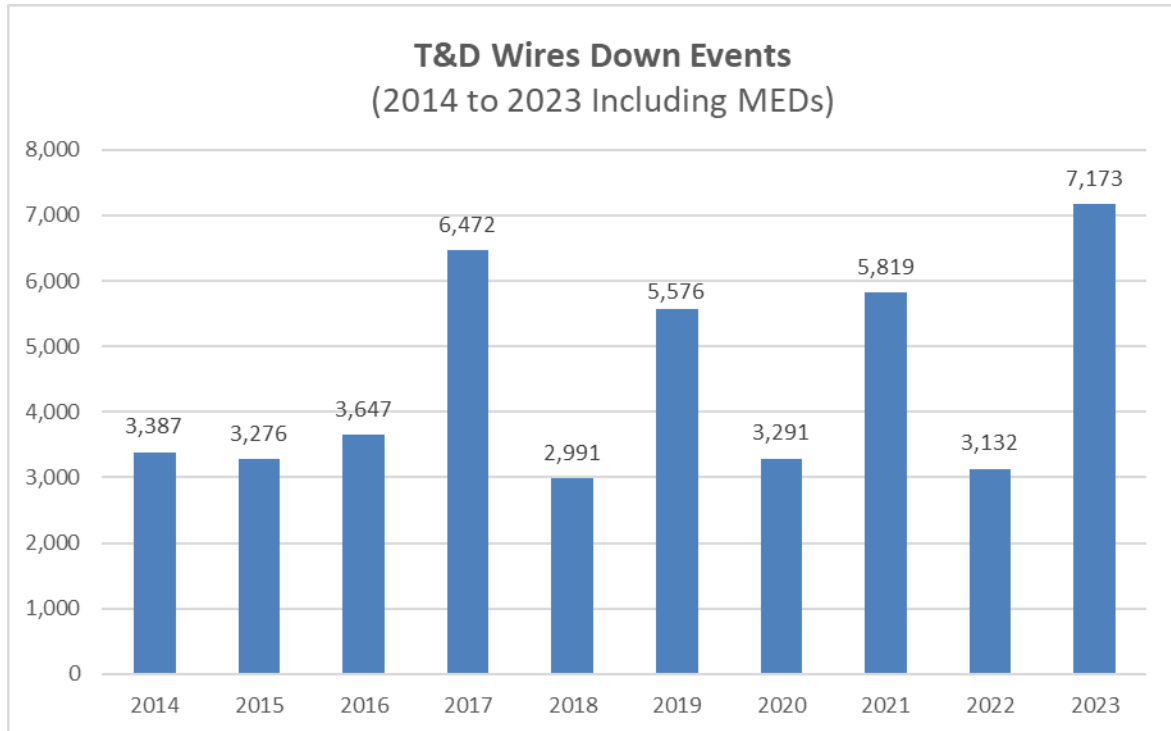
10      **Risks:** Wildfire, Failure of Electric Transmission Overhead Assets, and Failure  
11      of Electric Distribution Overhead Assets

12      **Category:** Electric

13      **Units:** Number of wire down events

1 **Summary:**

**FIGURE 5-2  
T&D OVERHEAD WIRES DOWN METRIC DATA (ANNUAL)**



**Historical Number of MEDs**

2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
5	10	3	30	7	31	14	25	5	20

Note: The data in this figure is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

2 **Narrative Context:** The metric, inclusive of MEDs is not being used for internal  
3 reporting purposes. PG&E focuses on transmission and primary distribution  
4 conductor wire down events, excluding MEDs. As can be seen in the data  
5 above, particularly in 2017, 2019, 2021, and 2023 the results for this metric  
6 fluctuate heavily based on the number of severe weather event days in a  
7 particular year. PG&E uses the IEEE 1366 Standard titled IEEE Guide for  
8 Electric Power Distribution Reliability Indices to define and apply excludable  
9 MEDs to measure the performance of its electric system under normally  
10 expected operating conditions. Its purpose is to allow major events to be  
11 analyzed apart from daily operation and avoid allowing daily trends to be hidden  
12 by the large statistical effect of major events. Per the Standard, the MED



1 classification is calculated from the natural log of the daily System Average  
2 Interruption Duration Index (SAIDI) values over the past five years. The SAIDI  
3 index is used as the basis since it leads to consistent results and is a good  
4 indicator of operational and design stress. Given the fluctuations in this metric  
5 from weather patterns, PG&E does not view it as an appropriate metric to  
6 properly assess system performance or improvement.

7 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
8 **or Higher) Compensation Levels and/or Incentives?**

9 No, in 2023, T&D Overhead Wires Down–MEDs was not used as a STIP  
10 metric.

11 **Is Metric Linked to the Determination of Individual or Group Performance**  
12 **Goals?**

13 No, T&D Overhead Wires Down–MEDs is not linked to 2023 individual or  
14 group performance goals for Director-level, or higher, positions.

15 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

16 No, T&D Overhead Wires Down–MEDs is not linked to 2023 individual  
17 performance goals for Director-level, or higher, positions.

18 **Bias Controls:** Internal Auditing performed a validation of the 2023 metric  
19 performance. The wires down events are reported by field and control center  
20 personnel per uniform reporting guidelines as the events occur.

- 21 • Engineers conduct post wire down event reviews (typically for the non-MED  
22 events) and will initiate corrections to the data via the outage quality team to  
23 ensure the reporting guidelines were followed and the records align with  
24 information reported by repair crews.
- 25 • The outage quality team processes all valid change requests received and  
26 also initiates corrections based on their reviews and findings of the collected  
27 outage information.

28 **Rate Case Safety Goal Progress:** The T&D Wires Down metric (including  
29 MEDs) is not a 2023 GRC or 2020 RAMP stated safety goal.

30 Significant work was performed to reduce wires down, including replacing  
31 overhead conductor, vegetation clearing, hardening of distribution circuits,

1 infrared inspections of overhead lines to identify and repair hot spots,  
2 investigating wires down incidents, and implementing learnings/corrective  
3 actions.

4 **Monthly Data:** See Attachment A at the end of this report.

1       **Metric 3: Electric Emergency Response Time**

2       **Metric Name and Description:** Electric Emergency Response Time –  
3       Average time and median time in minutes to respond on-site to an electric  
4       related emergency notification from the time of notification to the time a  
5       representative (or qualified first responder) arrived onsite. Emergency  
6       notification includes all notifications originating from 911 calls and calls made  
7       directly to the utilities’ safety hotlines. The data used to determine the average  
8       time and median time shall be provided in increments as defined in (GO) 112-F  
9       123.2 (c) as supplemental information, not as a metric.

10      **Risks:** Wildfire, Overhead Conductor, Public Safety, Worker Safety<sup>1</sup>

11      **Category:** Electric

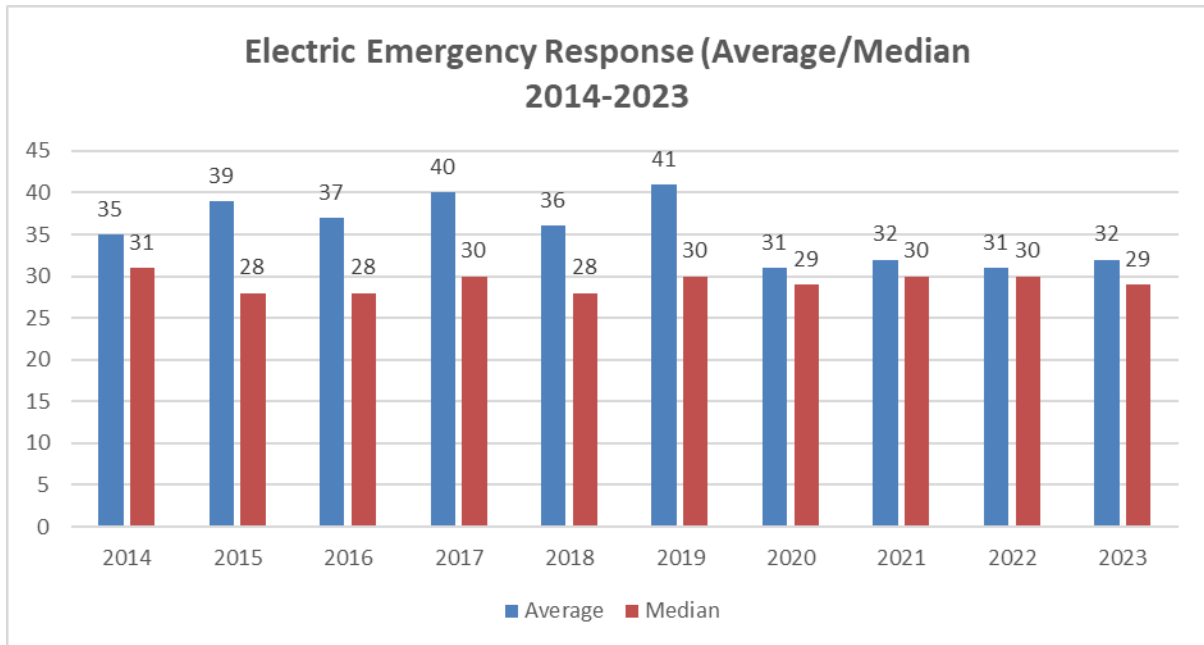
12      **Units:** The time in minutes that an electric crew person or a qualified first  
13      responder takes to respond after receiving a call which results in an emergency  
14      order.

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1      The Corporate Risk Register now has the following risks: (1) Wildfire, (2) Electric Transmission System-Wide Blackout, (3) Failure of Electric Distribution Overhead Assets, (4) Failure of Electric Distribution Underground Assets (5) Failure of Electric Transmission Overhead Assets, (6) Failure of Electric Distribution Substation Assets, (7) Failure of Electric Transmission Underground Assets (8) Failure of Electric Transmission Substation Assets, (9) Failure of Electric Distribution Network Assets, (10) Emergency Preparedness and Response.

1 **Summary:**

**FIGURE 5-3  
ELECTRIC EMERGENCY RESPONSE TIME (AVERAGE AND MEDIAN)  
(ANNUAL)**



2 **Narrative Context:** PG&E’s response to 911 calls and the amount of time it  
3 takes field resources to respond to those calls is primary performance metric  
4 used to evaluate PG&E’s commitment to public safety. There is a direct linkage  
5 between public safety and a utility’s response to emergency situations, which is  
6 why PG&E selected emergency response time for this element of the  
7 performance metric.

8 The keys to performing well on this metric are accurately predicting when  
9 large volumes of calls will come in (based on weather forecasts) and ensuring  
10 there are enough resources on hand to respond to all calls. This requires  
11 coordinating across departments (like Electric and Gas Operations) to share  
12 resources to respond when high volumes of 911 calls are anticipated. These  
13 tactics are especially important during stormy weather; high call volume during  
14 bad weather days may vary from year-to-year.

15 Metric performance has been driven by proactive scheduling of resources  
16 for 911 response, coordination across multiple functional areas on training and  
17 availability of resources for weather days and improved understanding of shifts

1 in storm fronts and impacts on the system. Additional actions include faster  
2 resource notification, utilization of GPS to integrate vehicle and the 911 standby  
3 tag locations and use of supplemental (non-traditional) resources.

4 PG&E's average response to 911 electric-related emergencies improved by  
5 9 percent and median response time improved by 7 percent from 2014-2023. In  
6 2023, PG&E's median showed a reduction of one minute and average response  
7 time showed an increase of one minute compared to 2022 performance. First  
8 quartile response times were also maintained.

9 PG&E began benchmarking its response to 911 calls with other utilities in  
10 2012. PG&E's 2011 performance was 3rd quartile, improving to 2nd quartile in  
11 2012-2014, and reaching 1st quartile in 2015. Since 2015, PG&E's historical  
12 performance has been within the first quartile and best-in-class in some years.

13 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
14 **or Higher) Compensation Levels and/or Incentives?**

15 Yes, Electric Emergency Response Time (within 60 minutes) was used as a  
16 STIP metric for 2023.

17 **Is Metric Linked to the Determination of Individual or Group Performance**  
18 **Goals?**

19 Yes, Electric Emergency Response Time (within 60 minutes) is linked to  
20 2023 performance goals for one or more Director-level, or higher, position.

21 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

22 Yes, Electric Emergency Response Time (within 60 minutes) is linked to all  
23 individual goals as part of 2023 STIP plan. In addition, this metric may be  
24 included as part of an individual's performance goals.

25 **Bias Controls:** The metric performance data is captured and stored in the  
26 Outage Information System (OIS) database. Each 911 call has a time stamp.  
27 The start time of a 911 call involves receipt by utility personnel and entry into the  
28 OIS database (creation of a tag). The tag is created in the OIS database when  
29 the PG&E personnel is on the phone with the 911 dispatch agency (there is a  
30 direct 911 stand-by line into Gas dispatch, where all 911 stand-by calls are  
31 routed). This process removes the delay between the time the call is received  
32 and entered into the system. IA performed a validation of the 2023 metric

1 performance and periodically validated the controls in 2023 in place for  
2 gathering metric data and the Utility's performance in meeting the metric.

3 **Rate Case Safety Goal Progress:** This safety metric does not support a 2023  
4 General Rate Case (GRC) safety goal. See 2023 GRC (Application 21-06-021)  
5 Exhibit 4 Chapter 5 for a complete description of PG&E's Emergency  
6 Preparedness and Response for Electric Distribution.

7 **Monthly Data:** See Attachment A at the end of this report.

1       **Metric 4: Fire Ignitions**

2       **Metric Name and Description:** Fire Ignitions – The number of fire incidents  
3       annually reportable to the California Public Utilities Commission (CPUC) per  
4       Decision (D.) 14-02-015.

5       **Risks:** Failure of Electric Distribution Overhead Assets (no Enhanced Powerline  
6       Safety Settings), Failure of Electric Transmission Overhead Assets, Failure of  
7       Electric Distribution Underground Assets, Failure of Electric Transmission  
8       Underground Assets, Wildfire, Employee Safety Incident, Contractor Safety  
9       Incident, Third-Party Risk.<sup>2</sup>

10      **Category:** Electric

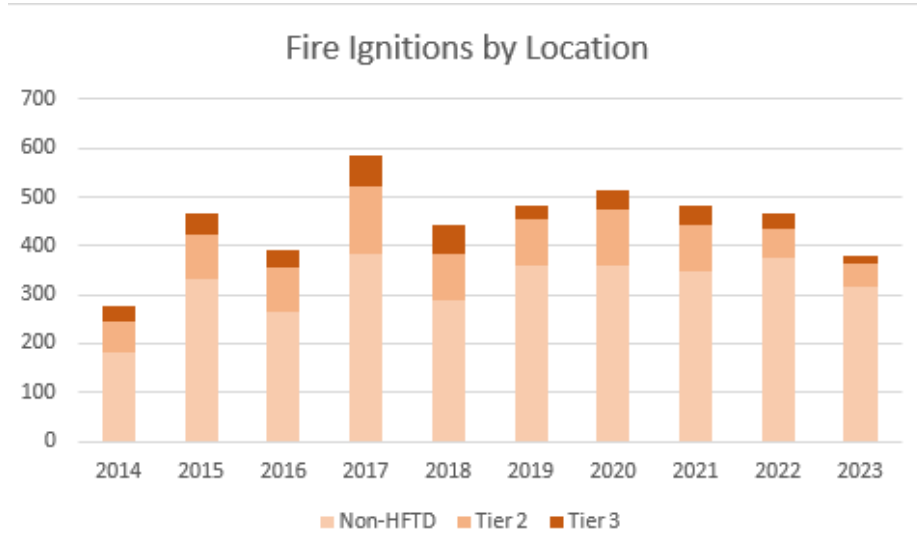
11      **Units:** Number of reportable ignitions.

12      **Summary:**

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2       The Corporate Risk Register now has the following risks: (1) Wildfire, (2) Electric Transmission System-Wide Blackout, (3) Failure of Electric Distribution Overhead Assets, (4) Failure of Electric Distribution Underground Assets (5) Failure of Electric Transmission Overhead Assets, (6) Failure of Electric Distribution Substation Assets, (7) Failure of Electric Transmission Underground Assets (8) Failure of Electric Transmission Substation Assets, (9) Failure of Electric Distribution Network Assets, (10) Emergency Preparedness and Response.

**FIGURE 5-4A  
FIRE IGNITION METRIC DATA (ANNUAL)<sup>3</sup>**



**TABLE 5-4B  
FIRE IGNITIONS METRIC DATA BY LOCATION (ANNUAL)**

Year	Non-HFTD	Tier 2	Tier 3	Zone 1	Total
2014	181	64	32		277
2015	332	91	42		465
2016	267	88	36		391
2017	383	139	62		584
2018	288	95	61		444
2019	361	92	28		481
2020	361	115	38		514
2021	347	95	39		481
2022	377	59	30		466
2023	315	50	14	0	379

Note: This data reflects minor changes to the historic count of reportable ignitions. In 2023, Pacific Gas and Electric Company (PG&E) reviewed and reattributed all ignitions in our ignition record to improve data completeness and accuracy for risk assessment purposes. Please see PG&E's Risk Assessment Improvement Plan item RE-01 in PG&E's 2023 – 2025 Wildfire Mitigation Plan.

<sup>3</sup> This report reflects 2 ignitions in 2023 that meet Electric Incident Report criteria, defined by Appendix B to CPUC D.06-04-055, for which PG&E has not formed a conclusion about the origin or cause.



1 **Narrative Context:** Reportable Fire Ignitions is a primary metric used to  
2 evaluate PG&E's commitment to public safety. This metric tracks the number of  
3 fire ignitions associated with electrical assets that meet the CPUC definition in  
4 D.14-02-015 within PG&E's service territory. PG&E began tracking this data in  
5 July 2014. The data is collected from multiple sources and validated through our  
6 Fire Incident Data Collection Processes (RISK-6306S/P):

- 7 • The Field Applications System (FAS) provides ignition information from Field  
8 Operations employee's as they respond to Field Orders. When a Field  
9 Operation employee arrives at an incident location and identifies signs that  
10 an ignition occurred, Field Operations selects "Yes" in the "Fire Incident"  
11 field of their mobile device. This then opens an "Ignitions" tab where the  
12 Field Operations enters information related to the ignition, including the fire  
13 location, suppressing agency information, whether media is on site, if the fire  
14 was extinguished, suspected cause, equipment ID numbers, weather, facility  
15 impacted, estimated wind, event element, fire size, type of construction, and  
16 evidence collected. Field Operations also attaches pictures to the Field  
17 Order. This information is received by the Ignition Investigation team who  
18 quality check (QC) and further investigate the ignitions.
- 19 • The Fire Host Form is an application used by all field operations to report  
20 ignition events associated to or potentially associated to PG&E electrical  
21 facilities, regardless of the fire/ignition size. With the Fire Host form a field  
22 order is not necessary for field operations to report a fire/ignition. The fire  
23 host form is used by field operations to provide information related to the  
24 ignition, similar to the "Field Application System."
- 25 • The Transmission Outage Tracking and Logging system provides  
26 information about any planned or unplanned outages on Transmission and  
27 Substation assets. The information is logged into office items reports, work  
28 cards, interruption reports, log details and notifications by the Grid Control  
29 Operators. The Ignition Investigation team perform daily reviews of these  
30 records/reports to identify any potential ignition related events.
- 31 • Trans-Sub Update Emails are email sent by the Transmission Grid Control  
32 Center regarding "trouble" or "force-outs" or "interruptions" that may mention  
33 if an ignition occurred as a result. The Ignition Investigation team perform  
34 daily reviews of these emails to identify any potential ignition related events.

- 1 • The Integrated Logging Information System (ILIS)/Outage Information  
2 System (OIS) systems contain information related to outages and switching  
3 to restore customers that were de-energized due to an equipment failure or  
4 electric incident. This information applies only to ignitions that result in an  
5 outage and contains information about the fault, potential causes of the fault,  
6 location and circuit information, customers affected by the outage, and steps  
7 and times to restore power to affected customers.
- 8 • The information received from these systems goes through a thorough  
9 investigation process. This process ensures that all required information for  
10 an event is received shortly after the event has occurred, and also ensures  
11 the ignition data is complete and accurate. The information is received by  
12 the Ignition Investigation team and entered into the Ignitions Database. The  
13 Ignition Investigations team then verifies the fire location, High Fire Threat  
14 District (HFTD), event element, suspected initiating cause and other fields.  
15 The Ignition Investigation team also communicates with Field Operations  
16 and responding fire agency incident leads to gather additional information on  
17 the incident.
- 18 • Discrepancies identified in our system of records  
19 (ILIS/OIS/FAS/Transmission Operation Tracking and Logging) are corrected  
20 during this investigation phase.
- 21 • The data is also sent to the appropriate Asset Family Owners to help those  
22 teams identify and address failure trends and align mitigation strategies with  
23 areas of risk. This data is also utilized to inform the wildfire risk model.

24 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
25 **or Higher) Compensation Levels and/or Incentives?**

26 Yes, Fire Ignitions was used as a STIP metric for 2023.

27 **Is Metric Linked to the Determination of Individual or Group Performance**  
28 **Goals?**

29 Yes, Fire Ignitions is linked to 2023 group performance goals for one or  
30 more Director-level, or higher, position.

1 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

2 Yes, Fire Ignitions is linked to all individual goals as part of 2023 STIP plan.  
3 In addition, this metric may be included as part of an individual's performance  
4 goals.

5 **Bias Controls:** The Ignition Investigation team has a documented and  
6 transparent ignition analysis process to ensure that all required information for  
7 an event is received shortly after the event occurred, is complete, and is  
8 accurate. IA performed a validation of the 2023 metric performance and  
9 periodically validated the controls in 2023 in place for gathering metric data and  
10 the Utility's performance in meeting the metric.

11 **Rate Case Safety Goal Progress:** While this metric was not a stated safety  
12 goal in the 2023 General Rate Case (GRC), PG&E tracks the number of fires  
13 (ignitions) as a key performance indicator in our Short Term Incentive Plan and  
14 as part of other external commitments, like the Safety Operation Metrics 3.13,  
15 3.14, 3.15, and 3.16 PG&E's 2023 GRC testimony<sup>4</sup> discussed planned work to  
16 mitigate the risk of wildfires and indicated that the controls for this risk will  
17 continue to be strengthened in the future due to the increasing severity of  
18 drought conditions and climate change, the size of PG&E's electric system, and  
19 the quantity and diversity of trees in the Company's service territory.

20 **Monthly Data:** See attachment A at the end of this report.

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<sup>4</sup> See 2023 (Application 21.06.021) GRC Exhibit (PG&E-4), Chapter 4-4.6 (Wildfire Risk and Policy Overview) for a complete description of PG&E's wildfire controls and mitigations. See also Chapter 9 for a description of PG&E's Vegetation Management program. All referenced testimony is to PG&E February 25, 2022 update to the 2023 GRC testimony.

1 **Metric 5: Third party Gas Dig-In**

2 **Metric Name and Description** The number of third-party gas dig-ins per 1,000  
3 Underground Service Alert (USA) tags/tickets received for gas. The ticket count  
4 excludes fiber and electric tickets. A gas dig-in refers to any impact or exposure  
5 that results in the need to repair an underground facility due to a weakening or  
6 the partial or complete destruction of the facility, including, but not limited to, the  
7 protective coating, lateral support, cathodic protection or the housing for the line  
8 device or facility. A third-party dig-in is damage caused by someone other than  
9 the utility or a utility contractor.

10 The Company participates in a one-call “811” public service program  
11 administered by USA. USA provides the Company notification of activities that  
12 could be damaging to the Company’s gas pipelines. These notifications are  
13 referred to as USA tickets. A ticket is the receipt of information by the Company  
14 from USA regarding onsite meetings, project designs, or a planned excavation.  
15 The ticket component of this metric includes Pacific Gas and Electric Company  
16 (PG&E) gas tickets received from all parties (i.e., first-, second-, and  
17 third-parties).

18 **Risks:** Loss of Containment (LoC) on Gas Transmission Pipeline; LoC on Gas  
19 Distribution Main or Service<sup>5</sup>

20 **Category:** Gas

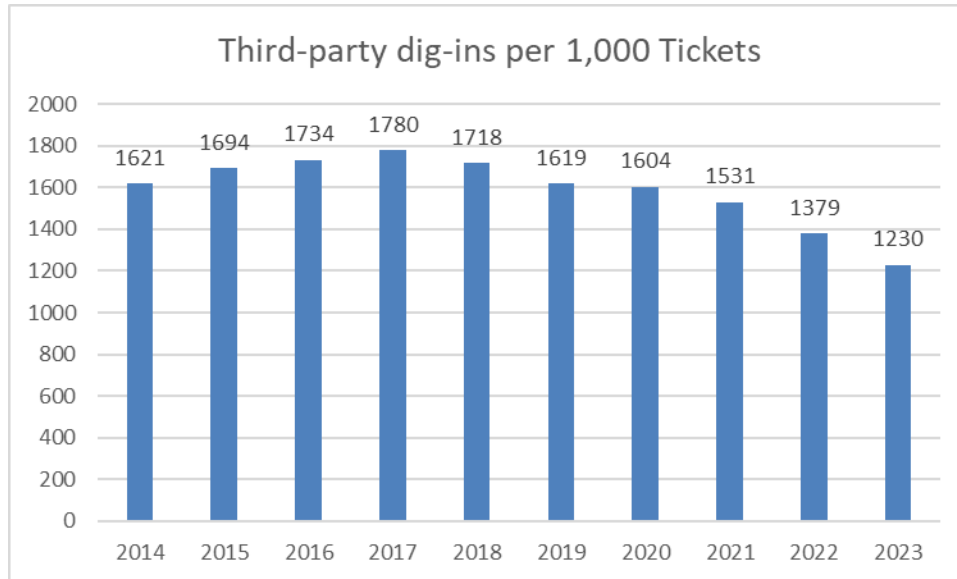
21 **Units:** The number of third-party gas dig-ins per 1,000 USA tags/tickets.

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5 The Corporate Risk Register now has the following risks: LoC on Gas Transmission Pipeline; LoC on Gas Distribution Main or Service.

1 **Summary:**

**FIGURE 5-5  
THIRD-PARTY DIG-INS PER 1,000 TICKETS (ANNUAL)**



2 **Narrative Context:** There has been a downward trend in the number of  
3 third-party dig-ins since 2017. A key contributor to the steady decline in dig-ins  
4 is attributed to increased participation in PG&E’s Safe Excavation Workshops.  
5 From 2019-2023, PG&E has conducted 1,024 Safe Excavation workshops  
6 providing training to 16,926 contractors. Additionally, PG&E has noted a  
7 49 percent reduction in the number of repeat offenders, (contractors with 2 or  
8 more dig-ins in a single year).

9 To continuously focus on improving performance, metric results are reported  
10 monthly and reviewed at leadership meetings and weekly huddles to discuss  
11 results and actions to take, as needed.

12 **Is Metric Used for the Purposes of Determining Executive (Director Level  
13 or Higher) Compensation Levels and/or Incentives?**

14 Yes, Gas Dig-In was used as a STIP metric for 2023.

15 **Is Metric Linked to the Determination of Individual or Group Performance  
16 Goals?**

17 Yes, Gas Dig-In is linked to 2023 group performance goals for one or more  
18 Director-level, or higher, position.

1 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

2 Yes, Gas Dig-In is linked to all individual goals as part of 2023 STIP plan. In  
3 addition, this metric may be included as part of an individual's performance  
4 goals.

5 **Bias Controls:** All dig-ins are reviewed by the Damage Prevention team to  
6 determine appropriate delineation of first-party, second-party, or third-party  
7 dig-in. Total USA tickets are determined by the California one-call system,  
8 independent to PG&E.

9 The metric definition for this metric including targets, target setting  
10 methodology, and exclusions, is documented and approved by Gas Operations  
11 Leadership. Metric results are reported monthly by the Gas Operations  
12 Business Process Governance team and reviewed at leadership meetings to  
13 discuss performance and act as needed. In the event that there is a resulting  
14 need for budget changes, approval must be obtained from the Gas Operations  
15 and Engineering Leadership team at the Enterprise-driven Project Delivery  
16 Center Change Control Forum.

17 On a quarterly basis, a supporting documentation package is prepared by  
18 the Damage Prevention team, reviewed by the Business Process Governance  
19 team, and then routed for Gas Operations Senior Leadership approval. The  
20 support packages are also reviewed quarterly by Compensation and by Internal  
21 Audit who performed a validation of the 2023 metric performance and  
22 periodically validated the controls in 2023 in place for gathering metric data and  
23 the Utility's performance in meeting the metric.

24 **Rate Case Safety Goal Progress:** This metric supports and reflects progress  
25 in PG&E's safety goal described in the 2023 General Rate Case (GRC) of dig-in  
26 prevention for the safety of PG&E employees, PG&E's contractors, and the  
27 public at large by reduced dig-ins per 1,000 tickets.<sup>6</sup>

28 Specific Damage Prevention and Public Safety programs and initiatives that  
29 contribute to dig-in reduction included in the 2023 GRC were: (1) Locate and  
30 Mark; (2) Standby Governance; (3) the Dig-in Reduction Team; (4) updates to  
31 the Locate and Mark Field Guide to provide clear instruction around critical

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6 See 2023 GRC Exhibit (PG&E-3), pp. 8-15 to 8-16.

1 processes for locating underground assets, including troubleshooting of difficult  
2 to locate facilities; (5) continued participation in the Gold Shovel Standard which  
3 PG&E began but is now run by a third-party and available to utilities and  
4 excavators across the nation; and, (6) the 811 Ambassador program which  
5 utilizes all PG&E employees to properly identify unsafe excavation activities.<sup>7</sup>

6 **Monthly Data:** See Attachment A at the end of this report.

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<sup>7</sup> See 2023 GRC Exhibit (PG&E-3), pp. 8-10 to 8-15.

1 **Metric 6: Gas In-Line Inspection (ILI)**

2 **Metric Name and Description:** Gas ILI – Total miles of transmission pipe  
3 inspected annually by ILI and percentage of transmission pipelines inspected  
4 annually by inline inspections.

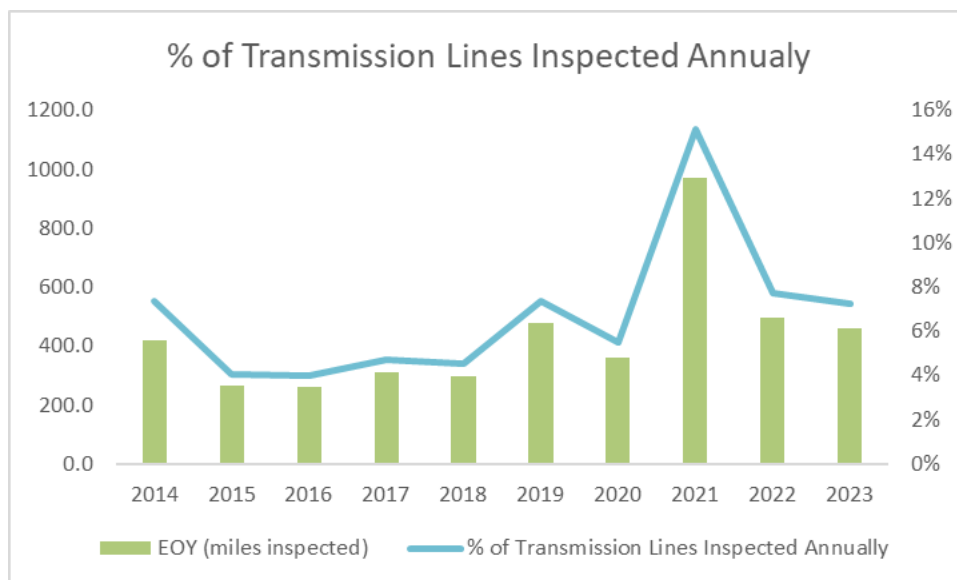
5 **Risks:** Loss of Containment (LoC) on Gas Transmission Pipeline<sup>8</sup>

6 **Category:** Gas

7 **Units:** Total number of miles of inspections performed and percentage  
8 inspected by ILI annually.

9 **Summary:**

**FIGURE 5-6  
MILES OF PIPELINE INSPECTED (ANNUAL)**



10 **Narrative Context:**

11 This metric measures Pacific Gas and Electric Company’s (PG&E) ILI work  
12 completed, including activities that exceed current code requirements. After the  
13 pipeline is upgraded to accommodate an ILI tool, cleaning and inspections are  
14 conducted to collect data about the pipe. This data is analyzed for pipeline  
15 anomalies that must be remediated through the Direct Examination and Repair  
16 process where the anomaly is exposed, examined, and repaired, as necessary.

---

<sup>8</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LoC) on Gas Transmission Pipeline



1 The information from Direct Examination and Repair is used to generate  
2 additional prevention/mitigation activities to improve the long-term safety and  
3 reliability of the pipeline.

4 Total miles of pipeline in-line inspected with traditional ILI tools vary by year  
5 and are correlated with miles of pipeline upgraded and required re-inspection  
6 miles. Decision 11-06-017, as codified by Public Utilities Code Section 958,  
7 requires natural gas transmission pipelines in California to be capable of ILIs,  
8 where warranted. In addition, both Title 49 of the Code of Federal Regulations –  
9 Transportation Part 192, Subpart O, and PG&E’s traditional ILI Program  
10 procedures requires reassessments, which drive the required ILI re-inspection  
11 miles in a given year. Further, ILI is the most reliable pipeline integrity  
12 assessment tool currently available to natural gas pipeline operators to assess  
13 the internal and external condition of transmission line pipe. The number of  
14 miles upgraded each year is based on a number of factors such as: individual ILI  
15 run lengths, risk identified on each ILI run, compliance due dates from identified  
16 threat(s), balancing of system hydraulics and resources. In 2023, PG&E  
17 inspected a total of 461.5 miles of pipe.

18 To continuously focus on improving performance, metric results are reported  
19 monthly and reviewed at leadership meetings and weekly huddles to discuss  
20 results and take action as needed. Performance in 2023 was on target. As  
21 noted above, the number of miles in-line inspected vary by year and are  
22 correlated with miles of pipeline upgraded and required re-inspection miles.

23 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
24 **or Higher) Compensation Levels and/or Incentives?**

25 No, in 2023, Gas ILI metric was not used as a STIP metric.

26 **Is Metric Linked to the Determination of Individual or Group Performance**  
27 **Goals?**

28 No, Gas ILI is not linked to 2023 individual or group performance goals for  
29 one or more Director-level, or higher, positions.

1 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

2 No, Gas ILI is not linked to 2023 individual performance goals for  
3 Director-level, or higher, positions.

4 **Bias Controls:** Metric results are reported monthly in the Centralized Metrics  
5 Repository (CMR), facilitated by the Operations Support, Reporting and  
6 Analytics team, and performance is reviewed monthly at Operating Reviews.  
7 Any required leadership support is requested in these Reviews.

8 **Rate Case Safety Goal Progress:** This metric supports PG&E’s safety goal  
9 described in the 2023 GRC of approximately 69 percent of its system being  
10 capable of Traditional ILI by the end of 2036 with the first time ILI completed the  
11 following year, 2037. In addition, pipeline sections that have had a baseline ILI  
12 inspection must be reassessed within 7 years, following the requirements of  
13 Subpart O and PG&E’s procedures.<sup>9</sup> However, it should be noted the 2023  
14 GRC Final Decision (D.23-11-069) adopted an ILI inspection forecast that  
15 reduced the pace of ILI work by eliminating 28 traditional ILI assessments on  
16 pipe not yet ILI enabled and deferring 23 ILI projects with compliance due dates  
17 in 2027.<sup>10</sup> This represents a decrease of required ILI system capability from  
18 69 percent by the end of 2036 to 65 percent by the end of 2038.

19 **Monthly Data:** See Attachment A at the end of this report.

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<sup>9</sup> See 2023 GRC Exhibit (PG&E-3), p. 5-28.

<sup>10</sup> See D.23-11-069, p. 90 to 92.

1 **Metric 7: Gas In-Line Upgrade**

2 **Metric Name and Description:** Gas In-Line Upgrade – Miles of gas  
3 transmission lines upgraded annually to permit inline inspections.

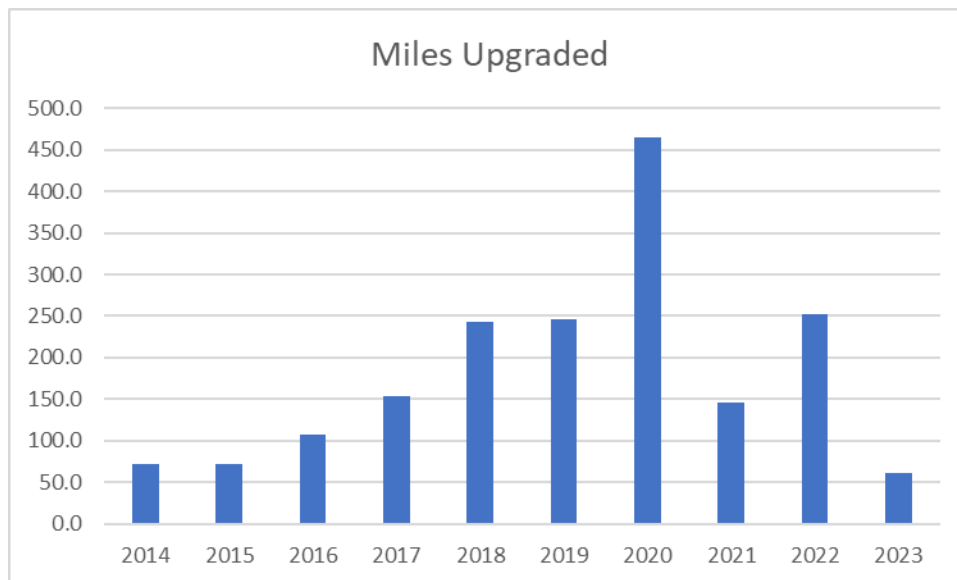
4 **Risks:** Loss of Containment (LoC) on Gas Transmission Pipeline<sup>11</sup>

5 **Category:** Gas

6 **Units:** Miles

7 **Summary:**

**FIGURE 5-7  
MILES OF PIPELINE UPGRADED (ANNUAL)**



8 **Narrative Context:** This metric measures the number of miles of complete  
9 planned Traditional In-Line Inspection (ILI) Upgrade projects, including activities  
10 that exceed current code requirements. Prior to running a Traditional ILI tool in  
11 a pipeline, a pipeline must be modified with portals called “launchers” and  
12 “receivers,” and pipeline features that would obstruct the passage of the tool to  
13 make the pipeline piggable must be replaced.

14 D.11-06-017, as codified by Pub. Util. Section 958, requires natural gas  
15 transmission pipelines in California be capable of ILIs, where warranted. ILI is  
16 the most reliable pipeline integrity assessment tool currently available to natural

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<sup>11</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LoC) on Gas Transmission Pipeline.

1 gas pipeline operators to assess the internal and external condition of  
2 transmission line pipe. The number of miles upgraded each year is based on  
3 several factors such as: individual ILI run lengths, risk identified on each ILI run,  
4 compliance due dates from identified threat(s), balancing of system hydraulics  
5 and resources. There are three major phases to an ILI Program. This metric is  
6 to track progress on the first phase, which involves modifying or upgrading the  
7 existing pipeline system to accommodate a traditional ILI tool. PG&E refers to  
8 this as “Traditional ILI Upgrades,” which involve capital improvements to make  
9 the pipelines piggable. It includes installing pig launchers and receivers in  
10 appropriate locations to introduce and remove the cleaning and ILI tools from the  
11 inside of the pipeline. It also includes replacing certain segments of pipe,  
12 valves, fittings, or other appurtenances that, if left in the system, would obstruct  
13 the movement of the tool through the pipeline.<sup>12</sup>

14 While the metric for this program is “miles upgraded,” the miles targeted for  
15 a given year may vary greatly. The amount of work associated with Traditional  
16 ILI Upgrades is based on projects and is not directly related to miles. This is the  
17 reason that PG&E’s 2023 General Rate Case forecast for the Traditional ILI  
18 Upgrade Program was based on a cost per project basis and did not use the  
19 length of projects as a forecasting basis.

20 To continuously focus on improving performance, metric results are reported  
21 monthly and reviewed at leadership meetings and weekly huddles to discuss  
22 results and act as needed.

23 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
24 **or Higher) Compensation Levels and/or Incentives?**

25 No, in 2023, Gas In-line Upgrade was not used as a STIP metric.

26 **Is Metric Linked to the Determination of Individual or Group Performance**  
27 **Goals?**

28 Yes, Gas In-Line Upgrade is linked to 2023 individual or group performance  
29 goals for one or more Director-level, or higher, position.

---

<sup>12</sup> For instance, it involves replacing reduced port valves and other obstructions, such as drip tubes, miter bends, short-radius elbows, and unbarred tees from the pipeline.

1 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

2 Yes, in 2023, the following position(s) include individual performance goals  
3 that are linked to Gas In-Line Upgrade:

- 4 • **Director:** Gas Engineering (1)

5 **Bias Controls:** Monitoring controls exist for this metric. Metric results are  
6 reported monthly by the GO Business Process Governance team and reviewed  
7 at leadership meetings and huddles to discuss performance and take action. In  
8 the event that there is a resulting need for budget changes, approval must be  
9 obtained from the Gas Operations and Engineering Leadership team at the  
10 Enterprise-driven Project Delivery Center Change Control Forum (PDC-CCF).

11 **Rate Case Safety Goal Progress:** This metric supports PG&E's safety goal  
12 described in the 2023 GRC to upgrade the system to be capable of ILI for  
13 4,553 transmission pipeline miles by the end of 2036, which is approximately  
14 69 percent of PG&E's Gas Transmission pipeline miles.<sup>13</sup> However, it should  
15 be noted the 2023 GRC Decision (D.23-11-069) reduced the number of ILI  
16 Upgrade projects per year from PG&E's forecasted 12 to 4.<sup>14</sup> As a result, the  
17 goal has since been adjusted to make approximately 65 percent of the system  
18 capable of ILI by the end of 2038.

19 **Monthly Data:** See Attachment A at the end of this report.

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<sup>13</sup> See 2023 GRC Exhibit (PG&E-3), p. 5-27.

<sup>14</sup> See D.23-11-069, p. 88.

1 **Metric 8: Gas Shut-In Time – Mains**

2 **Metric Name and Description:** Gas Shut-In Time – Mains – Median time to  
3 shut-in gas when an uncontrolled or unplanned gas release occurs on a main.  
4 The data used to determine the median time shall be provided in increments as  
5 defined in General Order 112-F 123.2 (c) as supplemental information, not as a  
6 metric.

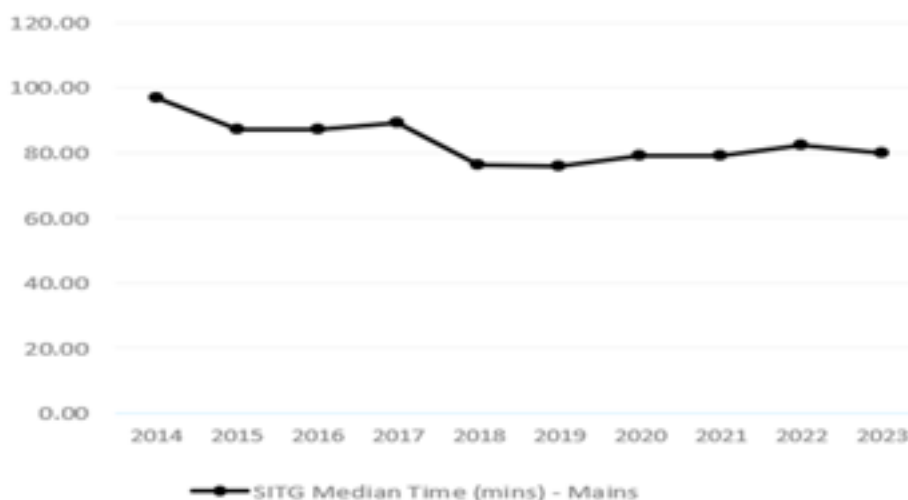
7 **Risks:** Loss of Containment (LoC) on Gas Distribution Main or Service<sup>15</sup>

8 **Category:** Gas

9 **Units:** Time in minutes required to stop the flow of gas for Distribution Mains

10 **Summary:**

**FIGURE 5-8  
SITG MEDIAN TIME – MAINS METRIC DATA (ANNUAL)**



11 **Narrative Context:** This metric measures the median time required for a  
12 qualified PG&E responder to arrive onsite and stop the flow of gas as result of  
13 damages impacting gas mains from PG&E’s distribution network.

14 In 2014, PG&E began to measure the time required for resources to  
15 respond to and make safe instances of blowing gas on distribution mains.  
16 Specifically measured are distribution events relating to dig-ins, vehicle impacts,  
17 explosions, and material failures. In 2014, considering from a median

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<sup>15</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LOC) on Gas Distribution Main or Service.

1 standpoint, it required PG&E 97 minutes to respond to and make safe events  
2 involving distribution mains. In 2023, this response time by PG&E has  
3 substantially improved to 80.0 minutes leading to a reduction by almost  
4 18 percent compared to 2014 and almost 3 percent compared to 2022

5 Metric results have improved and have been achieved through the following  
6 process improvements implemented in the past ten years:

- 7 • Enhanced plastic squeeze capability from approximately 50 percent to all  
8 Gas Service Representatives (GSR) < 1.5” plastic pipe;
- 9 • Provide yearly plastic squeeze training for all Field Service employees;
- 10 • Purchased and implemented emergency trailers in every division, allowing  
11 for emergency equipment to be accessed quickly and easily;
- 12 • Purchased additional steel squeezers for 2-8” steel pipe (housed on  
13 emergency trailers);
- 14 • Implemented Emergency Management tool (EM tool) to alert maintenance  
15 and construction (M&C) of SITG events when notified by third-party  
16 emergency organizations;
- 17 • Established concurrent response protocol (dispatch M&C and Field Service  
18 resources) when notified by emergency agencies;
- 19 • Implemented 30-60-90-120+ minute communication protocols between Gas  
20 Distribution Control Center (GDCC) and Incident Commander (IC) to ensure  
21 consistent communication and issue escalation during events; and
- 22 • Tier 3 incident review meetings weekly to share best practices and review  
23 long duration events.

24 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
25 **or Higher) Compensation Levels and/or Incentives?**

26 No, in 2023, Gas Shut-In Time – Main was not used as a STIP metric.

27 **Is Metric Linked to the Determination of Individual or Group Performance**  
28 **Goals?**

29 Yes, Gas Shut-In Time – Mains is linked to 2023 individual or group  
30 performance goals for one or more Director-level, or higher, position.

31 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

32 Yes, in 2023, the following position(s) include individual performance goals  
33 that are linked to Gas Shut-In Time – Main.

1 • **Senior Vice President:** Gas Operations (1)

2 **Bias Controls:** Dispatch incidents are logged and tracked in the EM tool  
3 database. The most current system (administered through Dynamic 365, which  
4 was implemented in 2018) automatically generates a change log for every  
5 notification at the field level to ensure system controls and retention of record  
6 history. The data is reviewed by the Gas Operations Business Process  
7 Governance to ensure accuracy.

8 The metric definition for this metric including targets, target setting  
9 methodology, and exclusions, are documented and approved by Gas Operations  
10 Leadership. Metric results are reported monthly by the Reporting and Analytics  
11 and Metrics team and reviewed at leadership meetings to discuss performance  
12 and take action. IA performed a validation of the 2023 metric performance. In  
13 the event that there is a resulting need for budget changes, approval must be  
14 obtained from the Gas Operations and Engineering Leadership team at the  
15 Enterprise-driven Project Delivery Center Change Control Forum (PDC-CCF).

16 **Rate Case Safety Goal Progress:** While this metric is not specifically stated in  
17 the 2023 GRC, it is tracked and reported in PG&E's Safety and Operational  
18 Metrics Report.

19 **Monthly Data:** See Attachment A at the end of this report.



1 **Metric 9: Gas Shut-In Time – Services**

2 **Metric Name and Description:** Gas Shut-In Time – Services Median time to  
3 shut-in gas when an uncontrolled or unplanned gas release occurs on a service.  
4 The data used to determine the median time shall be provided in increments as  
5 defined in GO 112-F 123.2 (c) as supplemental information, not as a metric.

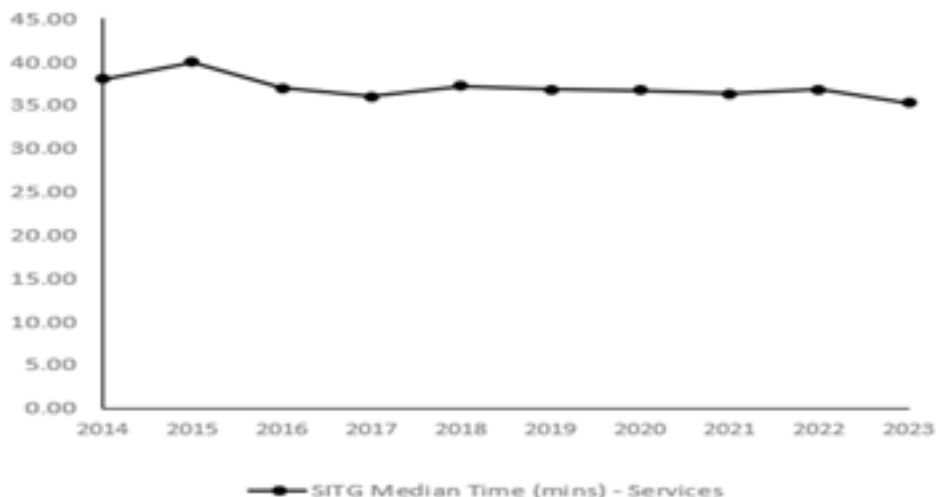
6 **Risks:** Loss of Containment (LoC) on Gas Distribution Main or Service<sup>16</sup>

7 **Category:** Gas

8 **Units:** Time in minutes required to stop the flow of gas for Distribution Services

9 **Summary:**

**FIGURE 5-9  
SITG MEDIAN TIME- SERVICES METRIC DATA (ANNUAL)**



10 **Narrative Context:** PG&E has measured the median time required to respond  
11 to and make safe instances of blowing gas on distribution services since 2014.  
12 Specifically measured are distribution events relating to dig-ins, vehicle impacts,  
13 explosions, material failures and pipeline leaks. In 2014, considering from a  
14 median standpoint, it required PG&E 38 minutes to respond to and make safe  
15 events involving distribution services. In 2023, the median response time was  
16 35.3 minutes, a reduction of 7 percent compared to 2014 and 4 percent  
17 compared to 2022. Metric results have improved and have been achieved

---

<sup>16</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LOC) on Gas Distribution Main or Service

1 through the following process improvements implemented during the past  
2 eight years:

- 3 • Enhanced plastic squeeze capability from ~50 percent to all GSRs < 1.5”  
4 plastic pipe;
- 5 • Provide yearly plastic squeeze training for all Field Service employees;
- 6 • Purchased and implemented emergency trailers in every division, allowing  
7 for emergency equipment to be accessed quickly and easily;
- 8 • Purchased additional steel squeezers for 2-8” steel pipe (housed on  
9 emergency trailers);
- 10 • Implemented Emergency Management tool (EM) tool to alert M&C of SITG  
11 events when notified by third-party emergency organizations;
- 12 • Established concurrent response protocol (dispatch M&C and Field Service  
13 resources) when notified by emergency agencies;
- 14 • Implemented 30-60-90-120+ minute communication protocols between  
15 GDCC and IC to ensure consistent communication and issue escalation  
16 during events; and
- 17 • Tier 3 incident review meetings weekly to share best practices and review  
18 long duration events.

19 **Is Metric Used for the Purposes of Determining Executive (Director Level  
20 or Higher) Compensation Levels and/or Incentives?**

21 No, in 2023, Gas Shut-In Time – Services was not used as a STIP metric.

22 **Is Metric Linked to the Determination of Individual or Group Performance  
23 Goals?**

24 Yes, Gas Shut-In Time – Services is linked to 2023 individual or group  
25 performance goals for one or more Director-level, or higher, position.

26 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

27 Yes, in 2023, the following position(s) include individual performance goals  
28 that are linked to Gas Shut-In Time – Services :

- 29 • **Senior Vice President:** Gas Operations (1)

30 **Bias Controls:** Dispatch incidents are logged and tracked in the EM tool  
31 database. The most current system (administered through Dynamic 365 which  
32 was implemented in 2018) automatically generates a change log for every

1 notification down to the field by field basis to ensure system controls and  
2 retention of record history. The data is reviewed by the process team to ensure  
3 accuracy.

4 Monitoring controls also exist for this metric. The metric definition for this  
5 metric including targets, target setting methodology, and exclusions, are  
6 documented and approved by Gas Operations Leadership. Metric results are  
7 reported monthly by the Reporting and Analytics and reviewed at leadership  
8 meetings and huddles to discuss performance and take action. In the event  
9 that there is a resulting need for budget changes, approval must be obtained  
10 from the Gas Operations and Engineering Leadership team at the  
11 Enterprise-driven Project Delivery Center Change Control Forum (PDC-CCF).

12 IA performed a validation of the 2023 metric performance.

13 **Rate Case Safety Goal Progress:** While this metric is not specifically  
14 stated in the 2023 GRC, it is tracked and reported in PG&E's Safety and  
15 Operational Metrics Report.

16 **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 10: Cross Bore Intrusions**

2 **Metric Name and Description:** Cross Bore Intrusions – Cross bore intrusions  
3 found per 1,000 inspections, reported on an annual basis.

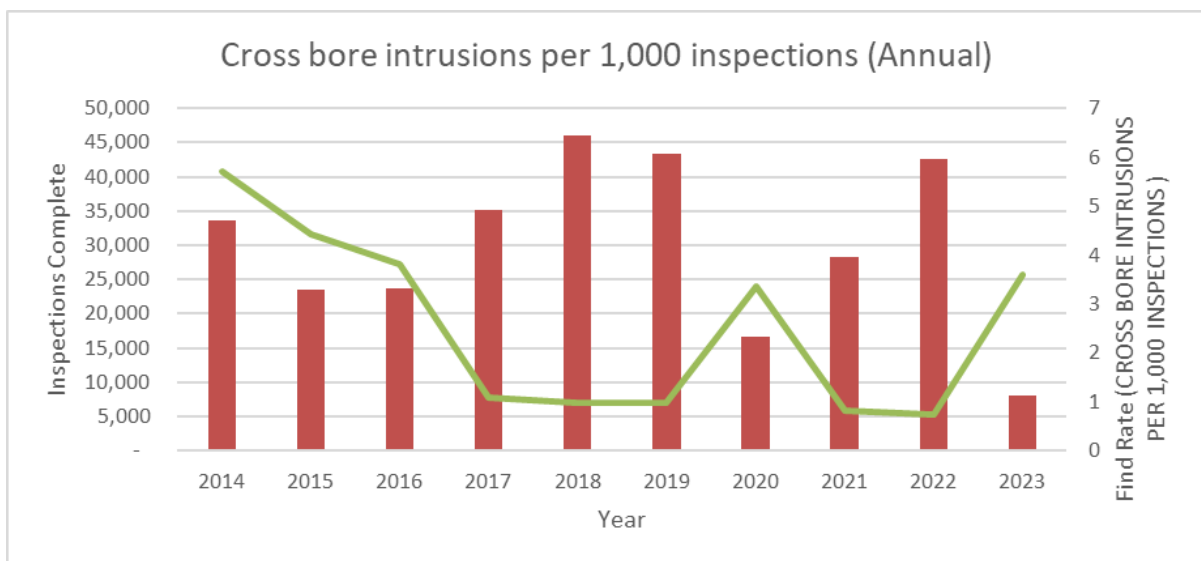
4 **Risks:** Loss of Containment (LoC) on Gas Distribution Main or Service<sup>17</sup>

5 **Category:** Gas

6 **Units:** Number of cross bore intrusions

7 **Summary:**

**FIGURE 5-10**  
**CROSS BORE INTRUSIONS PER 1,000 INSPECTIONS (ANNUAL)**



8 **Narrative Context:** The Cross Bore Intrusion metric measures the number of  
9 cross bores found per 1,000 inspections. A cross bore refers to a gas main or  
10 service that has been installed unintentionally, using trenchless technology,  
11 through a wastewater or storm drain system. Inspections refer to inspection of  
12 potential conflict locations and repair occurrences of cross bore discoveries in  
13 any location within PG&E territory. Cross bores pose a risk as they can result in  
14 a gas leak into the sewer system if damaged during mechanical sewer cleaning  
15 operations which may result in loss of containment and potential migration and

---

<sup>17</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LOC) on Gas Distribution Main or Service.

1 ignition of gas. The risk is mitigated by repairing the cross bore after finding it by  
2 inspection.

3 Since 2013, there has been a declining trend in find rate. There was an  
4 uptick in the find rate and a decrease in the number of inspections completed in  
5 2023 compared to prior years due to a focus on completing work in the City of  
6 San Francisco. This area has been identified as the highest risk of potential  
7 legacy cross bores, however, is also one of the most difficult geographic  
8 locations to perform inspections, which resulted in slower production.

9 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
10 **or Higher) Compensation Levels and/or Incentives?**

11 No, in 2023, Cross Bore Intrusions was not used as a STIP metric.

12 **Is Metric Linked to the Determination of Individual or Group Performance**  
13 **Goals?**

14 Yes, Cross Bore Intrusions is linked to 2023 individual or group performance  
15 goals for one or more Director-level, or higher, position.

16 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

17 Yes, in 2023, the following position(s) include individual performance goals  
18 that are linked to Cross Bore Intrusions:

- 19 • **Director:** Gas Operations (1).

20 **Bias Controls:** Cross bore inspection counts are logged and tracked within  
21 SAP as work is completed based on clerical updates from the field. A validation  
22 is conducted by the Distribution Operations team to ensure units and work type  
23 are correctly coded (inspection vs. repair) within the database. Cross bores  
24 found are logged by the field and tracked by the Cross Bore Program  
25 management team. When a potential cross bore intrusion is located, field  
26 personnel will contact the Cross Bore Program management team and will also  
27 call PGE-5000. This triggers a response for a Gas Service Representative and  
28 Locate and Mark operator to help validate the intrusion.

- 1     **Rate Case Safety Goal Progress:** This safety metric does not support a stated
- 2     safety goal in the 2023 GRC.<sup>18</sup>
  
- 3     **Monthly Data:** See Attachment A at the end of this report.

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<sup>18</sup> See 2023 GRC Exhibit (PG&E-3), p. 4-25.

1       **Metric 11: Gas Emergency Response Time**

2               **Metric Name and Description:** Gas Emergency Response Time – The  
3 average and median time in minutes a gas service representative (GSR)  
4 (or qualified first responder) takes to respond to a gas-related emergency  
5 notification, from the time of notification to the time of onsite arrival. Emergency  
6 notifications include all notifications originating from 911 calls and calls made  
7 directly to the utility’s safety hotlines. The data used to determine the average  
8 and median time shall be provided in increments as defined in General Order  
9 112-F 123.2 (c) as supplemental information, not as a metric. This information is  
10 identical to that of which is included in our Gas Emergency Response Business  
11 Process Review (BPR) and is excel data.

12       **Risks:** Loss of Containment (LoC) on Gas Distribution Main or Service<sup>19</sup>

13       **Category:** Gas

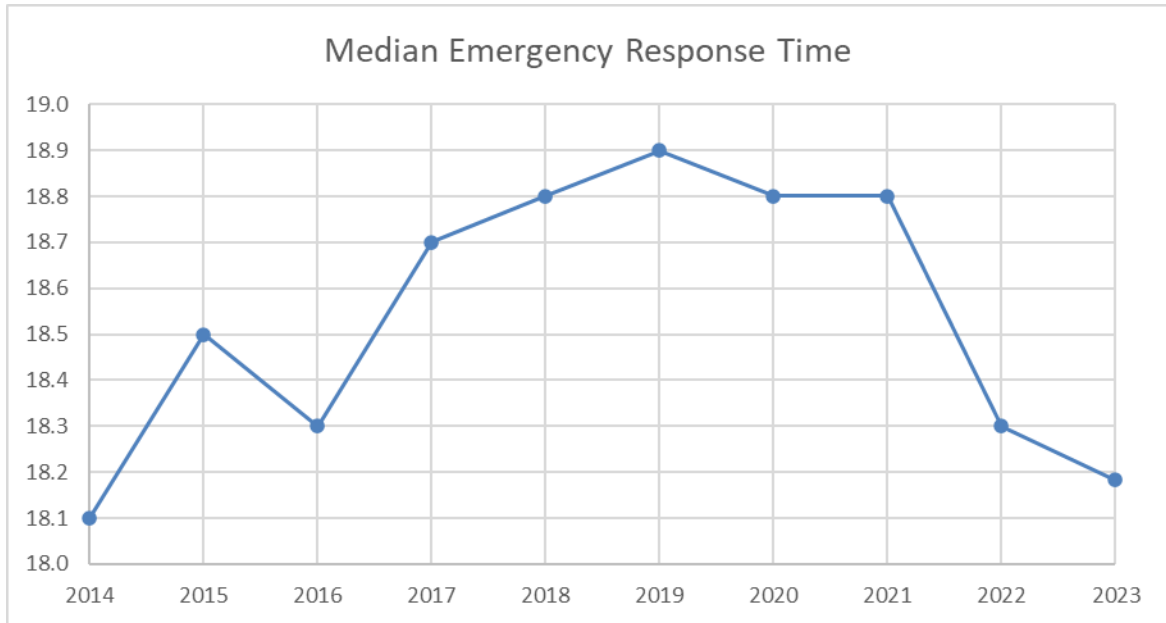
14       **Units:** The time in minutes that a GSR (or a qualified first responder) takes to  
15 respond after receiving a call which results in an emergency order.

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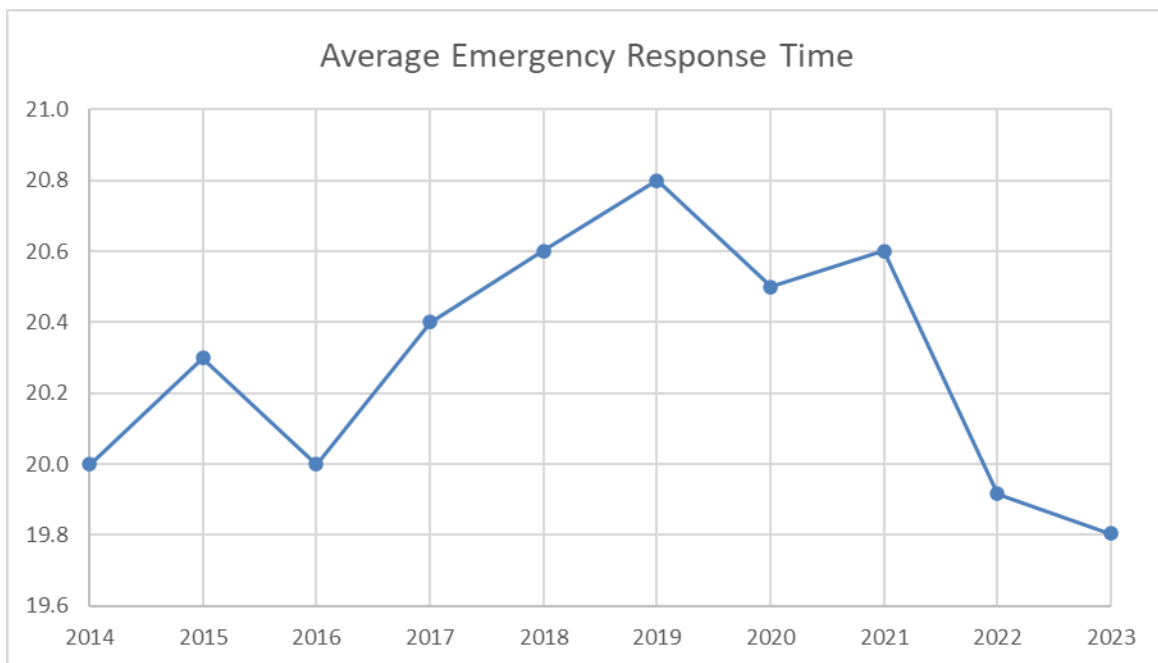
<sup>19</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LOC) on Gas Distribution Main or Service.

**Summary:**

**FIGURE 5-11A  
MEDIAN EMERGENCY RESPONSE TIME (ANNUAL)**



**FIGURE 5-11B  
AVERAGE EMERGENCY RESPONSE TIME (ANNUAL)**





1 **Narrative Context:** The average response time is measured from the time  
2 PG&E is notified of the gas emergency order/immediate response (IR) until a  
3 GSR or a qualified first responder arrives onsite to the emergency location  
4 (including Business Hours and After Hours). PG&E has maintained steady  
5 performance for the last several years. From 2014-2023, there has been a  
6 6 percent decrease in the average response time. From 2014-2023, the median  
7 time to respond to respond on-site to a gas emergency notification improved by  
8 5 percent. To continuously focus on improving performance, metric results are  
9 reported weekly and monthly and reviewed at leadership meetings and weekly  
10 huddles to discuss results and act as needed. We also share preliminary daily  
11 results for Daily Operating Reviews.

12 **Is Metric Used for the Purposes of Determining Executive (Director Level  
13 or Higher) Compensation Levels and/or Incentives?**

14 Yes, Gas Emergency Response Time was used as a STIP metric for 2023.

15 **Is Metric Linked to the Determination of Individual or Group Performance  
16 Goals?**

17 Yes, Gas Emergency Response Time is linked to 2023 performance goals  
18 for one or more Director-level, or higher, position.

19 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

20 Yes, Gas Emergency Response Time linked to all individual goals as part of  
21 2023 STIP plan. In addition, this metric may be included as part of an  
22 individual's performance goals.

23 **Bias Controls:** All response times to emergency calls are reviewed by the  
24 Immediate Response (IR) team to determine appropriate adjustments and  
25 exclusions, and the average response time is calculated. Response times are  
26 captured electronically using PG&E's Field Automation System and are verified  
27 on a sample basis.

28 Monitoring controls also exist for this metric. The metric definition for this  
29 metric including targets, target setting methodology, and exclusions, are  
30 documented and approved by Gas Operations Leadership. Metric results are  
31 reported monthly in the Centralized Metrics Repository (CMR), facilitated by the  
32 Operations Support, Reporting and Analytics team, and performance is reviewed

1 monthly at Operating Reviews. Any required leadership support is requested in  
2 these Reviews.

3 IA performed a validation of the 2023 metric performance and periodically  
4 validated the controls in 2023 in place for gathering metric data and the Utility's  
5 performance in meeting the metric.

6 **Rate Case Safety Goal Progress:** This safety metric supports a safety goal  
7 described in the 2023 GRC have a GSR on-site as quickly as possible for  
8 customer generated gas odor calls. Consistent with current practice, PG&E will  
9 continue to treat all customer-reported gas odor calls as IR and will attempt to  
10 respond to such calls within 60 minutes.<sup>20</sup>

11 **Monthly Data:** See Attachment A at the end of this report.

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<sup>20</sup> See 2023 GRC Exhibit (PG&E-3), p. 8-27 to 8-28.

1 **Metric 12: Natural Gas Storage Baseline Assessments Performed**

2 **Metric Name and Description:** Natural Gas Storage Baseline Assessments  
3 Performed – Tracks the progress of completing baseline and reassessment  
4 inspections that were expected to be completed within a given year. It reports  
5 the number of storage well baseline assessments completed as a percentage of  
6 the number scheduled to be completed in the period. The number scheduled  
7 will depend on any regulatory required inspections as well as any initiated by the  
8 utility.

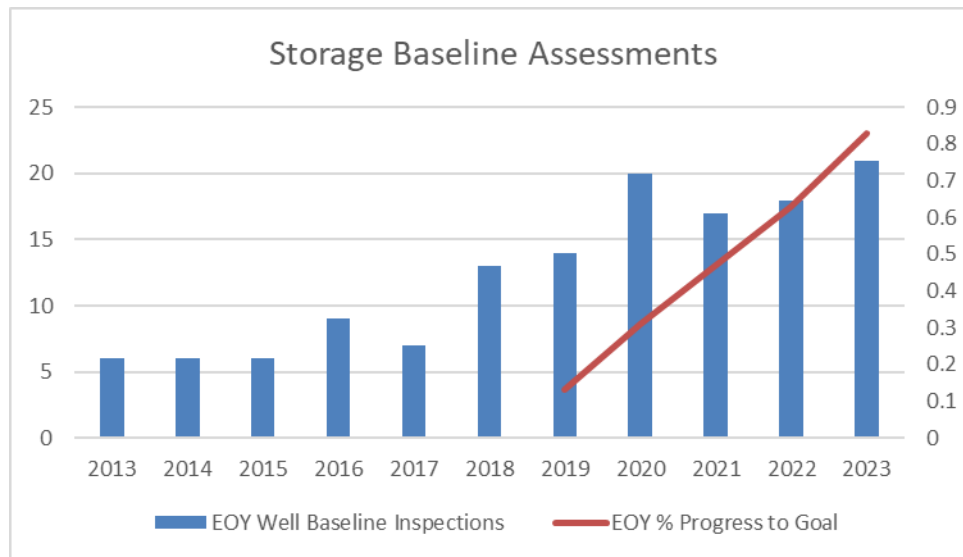
9 **Risks:** Loss of Containment (LoC) at Natural Gas Storage Well or Reservoir  
10 (NGSWR)<sup>21</sup>

11 **Category:** Gas

12 **Units:** Number of Assessments completed/Number scheduled or targeted

13 **Summary:**

**FIGURE 5-12  
STORAGE BASELINE WELL ASSESSMENTS (ANNUAL)**



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<sup>21</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LoC) at Natural Gas Storage Well or Reservoir (NGSWR).

1 **Narrative Context:** The Natural Gas Storage Baseline Inspections metric  
2 measures the number of baseline well assessments performed since 2013.  
3 PG&E planned to complete baseline well production casing assessments on  
4 109 wells by 2024 per objectives defined in PG&E's Gas Storage Asset  
5 Management Plan and also adjusted to incorporate an accelerated pace  
6 required by regulation changes in the storage industry at both federal and state  
7 levels.

8 In 2023, all wells have been baselined with the original tool. PG&E  
9 completed 21 well inspections in 2023 and is on track to complete 100 percent  
10 of baseline inspections by 2024.

11 However, wells that were inspected prior to 2019 must be re-baselined using  
12 additional well inspection baselining tools that are now required under the new  
13 regulations, effective October 2018. The plan approved by the California  
14 Geologic Energy Management Division (CalGEM) requires baseline casing  
15 inspections under the full inspection tool suite by 2024. PG&E is on track to  
16 complete the remaining well re-baseline inspections and conversions to dual  
17 barrier construction in 2024 in alignment with the CalGEM June 1, 2021 plan.  
18 PG&E is currently seeking approval from CalGEM for a risk-based reinspection  
19 interval.

20 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
21 **or Higher) Compensation Levels and/or Incentives?**

22 No, in 2023, Natural Gas Storage Baseline Inspections Performed was not  
23 used as a STIP metric.

24 **Is Metric Linked to the Determination of Individual or Group Performance**  
25 **Goals?**

26 No, Natural Gas Storage Baseline Inspections Performed is not linked to  
27 2023 individual or group performance goals for one or more Director-level, or  
28 higher, position.

1 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

2 No, in 2023, Natural Gas Storage Baseline Inspections Performed is not  
3 linked to 2023 individual performance goals for Director-level, or higher,  
4 positions.

5 **Bias Controls:** Data Integrity – Project completion (assessment complete) is  
6 tracked in the P6 scheduling tool and database and the Reservoir Engineering  
7 team is responsible for validating that the assessment is a first-time inspection  
8 and not a reinspection of the same well. CalGEM is also responsible for  
9 validating work completion as well inspection log survey results must be  
10 submitted as part of regulation.

11 **Rate Case Safety Goal Progress:** This safety metric supports a safety goal  
12 described in the 2023 GRC to complete baseline inspections on wells at the  
13 McDonald Island and Los Medanos underground storage facilities by 2023.<sup>22</sup>  
14 In addition, PG&E is on track to complete well conversions at McDonald Island  
15 and Los Medanos to dual barrier by 2024.

16 **Monthly Data:** See Attachment A at the end of this report.

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<sup>22</sup> See 2023 GRC Exhibit (PG&E-3), pp. 7-17 to 7-18.

1 **Metric 13: Gas Pipelines That Can Be Internally Inspected**

2 **Metric Name and Description:** Gas Pipelines That Can Be  
3 Internally-Inspected – Total miles and percent of system that can be internally  
4 inspected (“pigged”) relative to all transmission pipelines in the system.

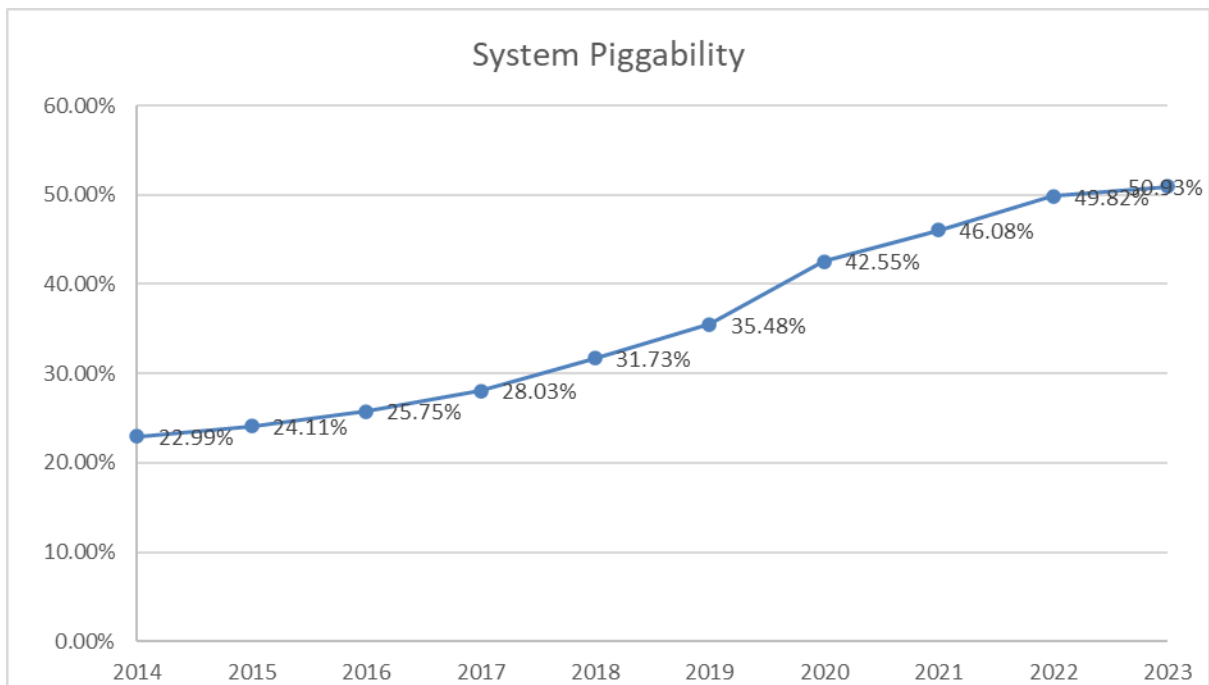
5 **Risks:**

6 **Category:** Gas

7 **Units:** Miles and percentage

8 **Summary:** Loss of Containment (LoC) on Gas Transmission Pipeline<sup>23</sup>

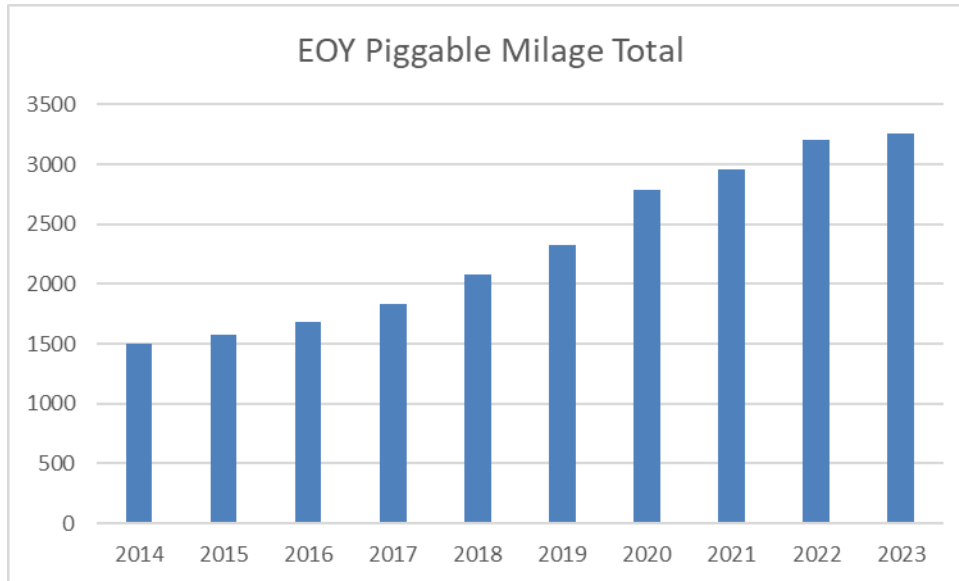
**FIGURE 5-13A**  
**GAS PIPELINES THAT CAN BE INTERNALLY-INSPECTED (ANNUAL)**



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<sup>23</sup> The Corporate Risk Register now has the following risks: Loss of Containment (LoC) on Gas Transmission Pipeline.

**FIGURE 5-13B  
GAS PIPELINES THAT CAN BE INTERNALLY-INSPECTED (ANNUAL)**



1 **Narrative Context:** In-Line Inspection (ILI) is the most reliable pipeline integrity  
2 assessment tool currently available to natural gas pipeline operators to assess  
3 the internal and external condition of transmission line pipe. In 2023, PG&E  
4 upgraded 60.75 miles, for a total of 3247.8 system piggable miles.

5 **Is Metric Used for the Purposes of Determining Executive (Director Level  
6 or Higher) Compensation Levels and/or Incentives?**

7 No, in 2023, Gas Pipelines That Can Be Internally Inspected was not used  
8 as a STIP metric.

9 **Is Metric Linked to the Determination of Individual or Group Performance  
10 Goals?**

11 No, Gas Pipelines That Can Be Internally Inspected is not linked to 2023  
12 individual or group performance goals for one or more Director-level, or higher,  
13 positions.

14 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

15 No, Gas Pipelines That Can Be Internally Inspected is not linked to 2023  
16 individual performance goals for Director-level, or higher, positions.

1       **Bias Controls:** Monitoring controls exist for this metric. Metric results are  
2 reported monthly in the Centralized Metrics Repository (CMR), facilitated by the  
3 Operations Support, Reporting and Analytics team, and performance is reviewed  
4 monthly at Operating Reviews. Any required leadership support is requested in  
5 these Reviews.

6       **Rate Case Safety Goal Progress:** This metric supports PG&E’s safety goal  
7 described in the 2023 GRC to upgrade the system to be capable of ILI for 4,553  
8 transmission pipeline miles by the end of 2036, which is approximately  
9 69 percent of PG&E’s Gas Transmission pipeline miles.<sup>24</sup> However, it should  
10 be noted the 2023 GRC Decision (D.23-11-069) reduced the number of ILI  
11 Upgrade projects per year from PG&E’s forecasted 12 to four (4).<sup>25</sup> As a result,  
12 the goal may have to be adjusted beyond 2036.

13       **Monthly Data:** See Attachment A at the end of this report.

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<sup>24</sup> See 2023 GRC Exhibit (PG&E-3), p. 5-27.

<sup>25</sup> See D.23-11-069, p. 88.



1 **Metric 14: Employee DART Rate**

2 **Metric Name and Description:** Employee DART Rate – DART Rate is  
3 calculated based on number of OSHA recordable injuries resulting in Days Away  
4 from work and/or Days on Restricted Duty or Job Transfer, and hours worked.

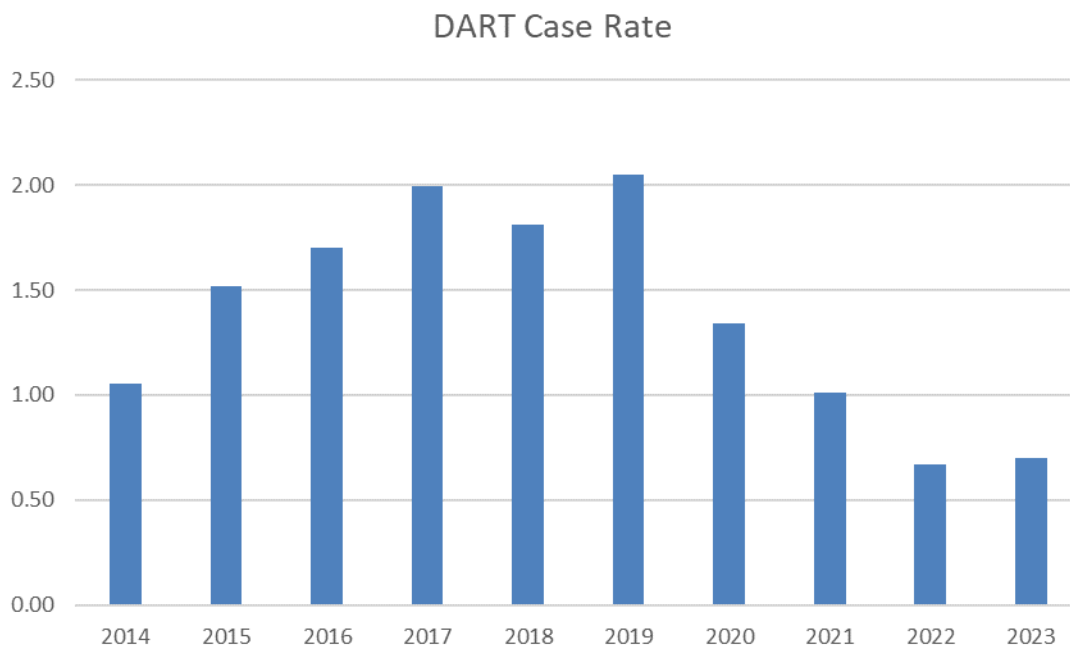
5 **Risks:** Employee Safety Incident<sup>26</sup>

6 **Category:** Injuries

7 **Units:** DART Cases times 200,000 divided by employee hours worked

8 **Summary:**

**FIGURE 5-14  
EMPLOYEE DART CASE RATE METRIC DATA (ANNUAL)**



9 **Narrative Context:** PG&E began tracking the employee DART Case Rate in  
10 2011. This metric showed a rate increase from 2014 until 2019 driven primarily  
11 by restricted duty cases related to sprains and strains. Since 2019, there has  
12 been a 66 percent decrease in the DART rate.

13 Efforts supporting a reduction include the expansion of PG&E's ergonomic  
14 programs and increased Industrial Athlete Specialists for job site evaluations.  
15 A primary goal of the efforts is reduced injury severity through injury prevention

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<sup>26</sup> The Corporate Risk Register includes the following risk: Employee Safety Incident.

1 and early intervention care for employees. In alignment with this, we have  
2 strengthened the identification of the highest risk work groups and tasks for field  
3 and vehicle ergonomic injuries. We identify high risk computer users through  
4 predictive modeling and provide targeted interventions. Additional efforts also  
5 include enhanced injury management containment for injuries at risk for  
6 escalation to DART and providing our people leaders with additional injury  
7 management training.

8 As follow-up to the response to SPD's expectation about DART case  
9 correlation with SIF incidents, PG&E is continuing to review DART cases and  
10 SIF incidents for a reliable correlation. A slightly higher DART rate and a lower  
11 number of SIF incidents occurred in 2023. Due to the small number of  
12 SIF-Actual incidents this analysis has been challenging. Nevertheless, we are  
13 continuing to explore this trend and have no new finding to share at this time.

14 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
15 **or Higher) Compensation Levels and/or Incentives?**

16 No, in 2023, Employee DART Rate was not used as STIP metric.

17 **Is Metric Linked to the Determination of Individual or Group Performance**  
18 **Goals?**

19 Yes, Employee DART Rate is linked to 2023 individual or group  
20 performance goals for one or more Director-level, or higher, position.

21 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

22 Yes, in 2023, the following position(s) include individual performance goals  
23 that are linked to Employee DART Rate.

- 24 • **Chief:** Enterprise Health and Safety (1), Finance (1), Generation (2),  
25 Human Resources & Enterprise Change Office (1), Operations (1)
- 26 • **Director:** Corporate Affairs (1), Customer & Communications (4), Electric  
27 Engineering (6), Electric Operations (24), Engineering, Planning &  
28 Strategy (3), Enterprise Health and Safety (7), Finance (4), Gas Engineering  
29 (5), Gas Operations (11), Generation (16), Human Resources & Enterprise  
30 Change Office (2), Information Technology (4), Operations (26), Shared  
31 Services (7), Supply Chain (3)

- 1 • **Senior Director:** Customer & Communications (4), Electric Engineering (3),  
2 Electric Operations (10), Enterprise Health & Safety (4), Finance (3), Gas  
3 Engineering (1), Gas Operations (9), General Counsel, Ethics, Risk &  
4 Compliance (1), Generation (3), Information Technology (1), Operations (8),  
5 Shared Services (3)
- 6 • **Vice President:** Customer & Communications (3), Electric Operations (2),  
7 Enterprise Health & Safety (1), Finance (1), Gas Operations (2), Generation  
8 (2), Human Resources & Enterprise Change Office (1), Operations (1),  
9 Shared Services (1), Supply Chain/Materials (1)
- 10 • **Senior Vice President:** Electric Engineering (1), Gas Engineering (1), Gas  
11 Operations (1), Generation (1)

12 **Bias Controls:** OSHA regulates the definition of a DART case and we use  
13 multiple sources to determine if the injury meets the criteria for DART. This  
14 includes feedback from the physician, the employee, and the supervisor.

15 **Rate Case Safety Goal Progress:** The metric is stated in 2023 GRC Safety  
16 and Health chapter (Chapter 1).<sup>27</sup> The year-end target for DART rate in 2023  
17 was 0.64. The year-end target for 2024 is 0.68. As previously mentioned, since  
18 2019 there has been a 66 percent decrease in the employee DART rate. The  
19 annual average number of DART cases was used in the 2020 RAMP model  
20 consequence analysis for the Employee Safety Incident risk.<sup>28</sup> RAMP model  
21 results for the risk reduction programs being implemented indicate a reduction in  
22 employee DART cases through 2026.

23 **Monthly Data:** See Attachment A at the end of this report.

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<sup>27</sup> PG&E 2023 GRC Exhibit (PG&E-7), Chapter 1, Safety and Health , p. 1-24.

<sup>28</sup> PG&E 2020 RAMP Report, Chapter 16, Risk Mitigation Plan: Employee Safety Incident.

1       **Metric 15: Rate of Serious Injuries or Fatalities (SIF) Actual (Employee)**

2       **Metric Name and Description:** Rate of SIF Actual (Employee) is calculated  
3       using the formula: Number of SIF-Actual cases among employees x 200,000/  
4       employee hours worked, where SIF Actual is counted using the methodology  
5       developed by the Edison Electric Institute’s (EEI) Occupational Safety and  
6       Health Committee (OS&HC) Safety and Classification Learning (SCL) Model.

7       If a utility has implemented a replicable substantially similar evaluation  
8       methodology for assessing SIF Actual, the utility may use that method for  
9       reporting this metric. If a utility opts to report the rate of SIF Actual using a  
10      method other than the EEI Safety Classification Model, it must explain how its  
11      methodology for counting SIF Actual differs and why it chose to use it.

12      As a supplemental reporting requirement to the SIF Actual (SIF-A) Rate for  
13      comparative purposes, all utilities shall also provide SIF-A data based on  
14      California Division of Occupational Safety and Health (Cal/OSHA) reporting  
15      requirements under Section 6409.1 of the California Labor Code.

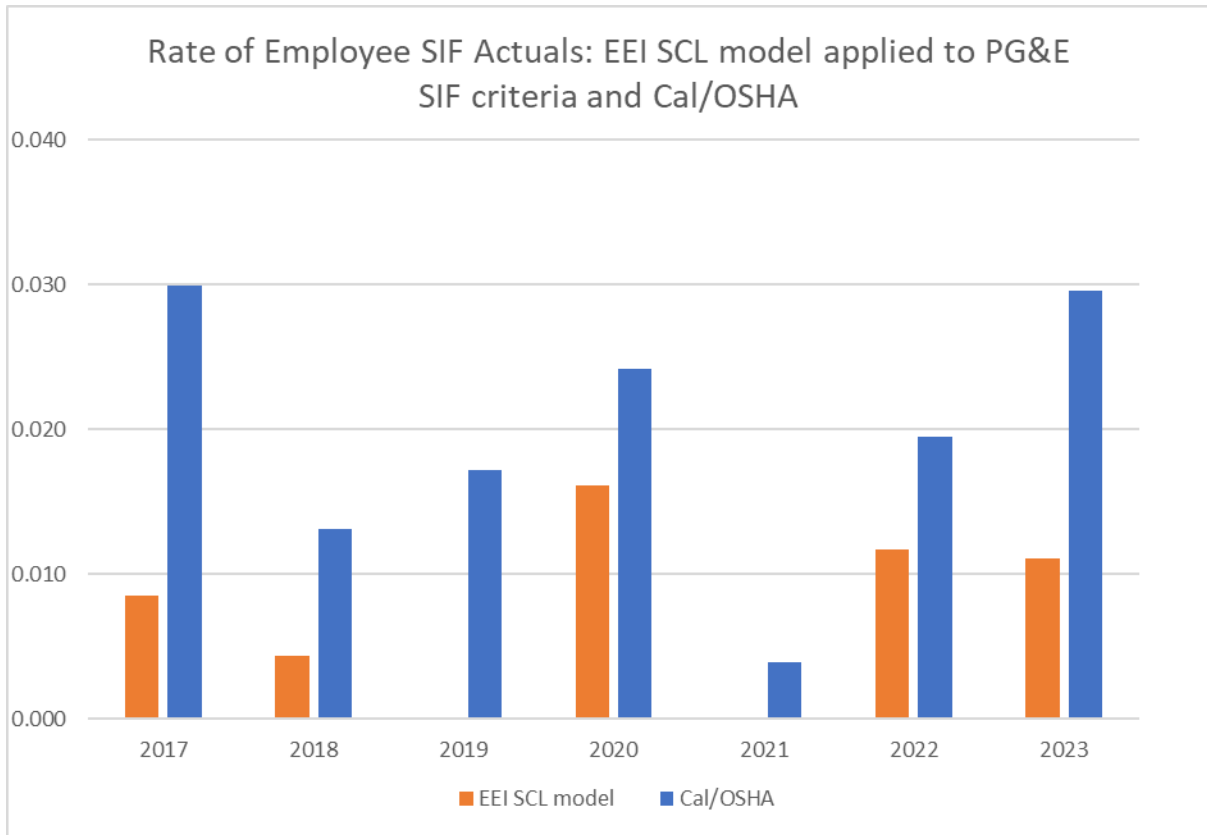
16      **Risks:** Employee Safety Incident

17      **Category:** Injuries

18      **Units:** Rate of SIF-Actual (SIF-A) cases among employees x 200,000/employee  
19      hours worked

1 **Summary:**

**FIGURE 5-15**  
**RATE OF SIF ACTUAL (EMPLOYEE) EEI SCL MODEL AND CAL/OSHA<sup>(a)</sup>**  
**DEFINITIONS COMPARISON**



(a) Per Cal/OSHA, a serious injury or illness is defined as one involving inpatient hospitalization, regardless of length of time, for other than medical observation or diagnostic testing; amputation; loss of an eye; or serious degree of permanent disfigurement.

2 **Narrative Context:** Pacific Gas and Electric Company’s (PG&E or the  
3 Company) SIF Program was deployed at the end of 2016 to establish a  
4 classification and cause evaluation process for coworker and contractor serious  
5 injuries or fatalities.<sup>29</sup> The goal of PG&E’s SIF Program is to reduce the number  
6 and severity of safety incidents that result in a SIF. The program objective is to  
7 learn from safety incidents by performing cause evaluations on each SIF-Actual

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<sup>29</sup> Per I.14-08-022, Kern Order Instituting Investigation (Kern OII) (Aug. 28, 2014) Settlement Agreement with California Public Utilities Commission (CPUC) see D.15-07-014.

1 (SIF-A) and SIF Potential (SIF-P) incident, implementing corrective actions, and  
2 sharing key findings across the enterprise.

3 In August of 2020, PG&E adopted Edison Electric International's (EEI)  
4 Safety Classification Learning (SCL) Model to mature classification of its SIF  
5 incidents.<sup>30</sup> Adopting the EEI SCL Model has improved PG&E's SIF Program  
6 by bringing a consistent and objective approach to reviewing and classifying SIF  
7 incidents and identifying high-energy tasks. The EEI SCL model does not  
8 directly define a SIF-A, rather it classifies incidents into categories: High-Energy  
9 SIF (HSIF),<sup>31</sup> Low-Energy SIF (LSIF),<sup>32</sup> Potential SIF (PSIF),<sup>33</sup> Capacity,<sup>34</sup>  
10 Exposure,<sup>35</sup> Success,<sup>36</sup> and Low Severity.<sup>37</sup> The HSIF terminology is fairly  
11 new to the industry; however, it is equivalent to a SIF-A with regard to how  
12 serious life threatening, life-altering or fatalities are determined.<sup>38</sup>  
13 While PG&E uses the EEI SCL model methodology to classify and track SIF-A  
14 incidents, PG&E's SIF Program differs slightly from the EEI model in that PG&E  
15 includes all types of Motor Vehicle Incidents (MVI) in its SIF counts, whereas the  
16 EEI SCL model does not.<sup>39</sup> PG&E believes that all MVIs (even where any injury  
17 did not occur) should be considered for SIF potentiality and will continue to

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**30** See, SCL Model at <https://esafetyline.net/eei/docs/eeiSCLmodel.pdf> at p. 17.

**31** *Id.* at p. 17, HSIF is defined as: "Incident with a release of high energy in the absence of a direct control where a serious injury is sustained."

**32** *Id.* at p. 17, LSIF is defined as: "Incident with a release of low energy in the absence of a direct control where a serious injury is sustained."

**33** *Id.* at p. 17, 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."

**34** *Id.* at p. 17, 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."

**35** *Id.* at p. 17, Exposure is defined as: "Condition where high energy is present in the absence of a direct control."

**36** *Id.* at p. 17, Success is defined as: "Condition where a high energy incident does not occur because of the presence of a direct control."

**37** *Id.* at p. 17, Low Severity is defined as: "Incident with a release of low energy where no serious injury is sustained."

**38** EEI Safety Classification and Learning (SCL) Model, Serious Injury or Fatality defined as Life-threatening or life-altering incident.

**39** This has been discussed during learning sessions with EEI and conversations with the SCL author that some MVIs do not fit within the parameters of the SCL model. PG&E uses its own MVI SIF classification process per SAFE-1002S: Motor Vehicle Standard, which is outside the SCL model classification process.

1 include them in the SIF counts. This may differ slightly from how other utilities  
2 classify and categorize MVIs.

3 This SPM definition includes the use of the EEI OS&HC serious injury  
4 criteria,<sup>40</sup> which defines a serious injury using fourteen specific injury criteria. In  
5 operation, and in discussions with peer utilities and EEI, PG&E finds that the  
6 OS&HC criteria does not align with the life altering/life threatening aspects of the  
7 SIF Program objective and is in contradiction to the SCL model purpose. PG&E  
8 does, however, define serious injury in its SIF Program,<sup>41</sup> which is substantially  
9 similar to the OS&HC criteria. The difference is that PG&E considers life  
10 altering/life threatening a substantial factor in serious injury determination.<sup>42</sup>  
11 As allowed by CPUC SPM definition for a SIF-A (Employee) incident, PG&E  
12 uses substantially similar criteria to classify an injury as serious as compared to  
13 the EEI OS&HC criteria including life threatening/life altering into the SIF-A  
14 determination. This determination can also include a third party medical  
15 consultant to review and concur with a serious injury classifications. This model  
16 allows the Company to focus its safety and risk mitigation efforts on the most  
17 serious outcomes and highest risk work where a high energy incident occurred.

18 There have been thirteen SIF-A Employee incidents between 2017 and  
19 2023, which include five fatalities and eight serious injuries. The events involved  
20 injuries caused by an intentional act of violence by a third-party, electrical  
21 contacts, a pipeline drying (pigging) line-of-fire incident, finger amputation due to  
22 the improper equipment use, and MVIs (including Off-Road Utility Vehicles  
23 (OUV)). Corrective actions have been taken to address the identified causes

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**40** Occupational Safety & Health Committee: Serious Injury & Fatality Criteria (SIF) can be reviewed at:  
<https://images.magnetmail.net/images/clients/EEI //attach/Environment/hsif2022.pdf>.

**41** SAFE-1100S: Serious Injury or Fatality Standard, Appendix A Examples of a Serious Injury.

**42** Per SAFE-1100S: PG&E defines a SIF-A (analogous to a EEI SCL HSIF) as: A work-related high-energy incident consequential from work at or for PG&E that results in any of the following to employees, contractors, or directly supervised contractors:

- A fatality – work-related fatal injury or illness;
- A life-threatening injury or illness that required immediate life-preserving action that if not applied immediately would likely have resulted in the death of that person;
- A life-altering injury or illness that resulted in a permanent and significant loss of a major body part or organ function.

1 and prevent potential future similar outcomes that could lead to a SIF-A event,  
2 including:

- 3 • Eliminated OUVs from use within PG&E, including rental of OUVs;
- 4 • Standing down all barehand electrical work until further notice; and
- 5 • Establishing the Enterprise Safe Access Asset Program Proposal to inspect  
6 and maintain PG&E road access to our assets.

7 The implementation of the PG&E Safety Excellence Management System  
8 (PSEMS) and stronger focus on workforce safety initiatives, such as  
9 development of critical risk standards, enhancing the field safety observations  
10 program, leader engagement, and lean operating model, will continue to reduce  
11 this trend.

12 With regard to Cal/OSHA reporting requirements, there were eight serious  
13 incidents involving PG&E employees in 2023, three of which were classified as  
14 SIF-Actual incidents using PG&E criteria.

Date	SIF Type	Incident	Summary
6/28/2023	Serious injury	Fresno Fall From Pole	A PG&E crew was performing a pole replacement when a crew member climbing the new pole fell.
4/17/2023	Serious injury	Campbell Electric Contact	A PG&E crew was replacing a street light service line. Employee made contact with energized conductor while installing the line.
1/31/2023	Fatality	Platina Tire Changing Fatality	A PG&E vegetation management inspector was fatally injured as he was changing a tire on his vehicle.

15 Cause evaluations were performed, and corrective actions have been or are  
16 being implemented.

17 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
18 **or Higher) Compensation Levels and/or Incentives?**

19 No, in 2023, Rate of SIF Actual (Employee) was not used as a STIP metric.

20 **Is Metric Linked to the Determination of Individual or Group Performance**  
21 **Goals?**

22 Yes, Rate of SIF Actual (Employee) is linked to 2023 performance goals for  
23 one or more Director-level, or higher, position.

24 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

25 Yes, in 2023, the following position(s) include individual performance goals  
26 that are linked to Rate of SIF Actual (Employee):



- 1 • Chief: Enterprise Health & Safety (1), Generation (2), Human Resources &  
2 Enterprise Change Office (1)
- 3 • Director: Customer & Communications (1), Electric Engineering (1), Electric  
4 Operations (19), Engineering, Planning & Strategy (2), Enterprise Health &  
5 Safety (6), Gas Operations (11), Generation (16), Human Resources &  
6 Enterprise Change Office (2), Information Technology (2), Operations (28),  
7 Shared Services (8), Supply Chain (2)
- 8 • Senior Director: Customer & Communications (2), Electric Engineering (2),  
9 Electric Operations (9), Enterprise Health & Safety (4), Gas Engineering (1),  
10 Gas Operations (6), Generation (3), Operations (9), Shared Services (2);
- 11 • Vice President: Customer & Communications (2), Electric Operations (1),  
12 Enterprise Health & Safety (1), Gas Operations (2), Generation (2), Human  
13 Resources & Enterprise Change Office (1), Operations (2), Shared  
14 Services (1)
- 15 • Senior Vice President: Gas Engineering (1), Gas Operations (1),  
16 Generation (1)

17 **Bias Controls:** Data is compiled by the Enterprise Health & Safety Team.  
18 Employee SIF events are reviewed weekly. IA performed a validation of the  
19 2023 metric performance and periodically validated the controls in 2023 in place  
20 for gathering metric data and the Utility's performance in meeting the metric.

21 **Rate Case Safety Goal Progress:** This metric is specifically stated in the 2023  
22 GRC<sup>43</sup> as a safety goal metric.

23 **Monthly Data:** See Attachment A at the end of this report.

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<sup>43</sup> PG&E 2023 GRC Exhibit (PG&E-7), Chapter 1, Safety and Health, p. 1-24.

1 **Metric 16: Rate of Serious Injuries or Fatalities (SIF) Actual (Contractor)**

2 **Metric Name and Description:** Rate of SIF Actual (Contractor) is calculated  
3 using the formula: Number of SIF-Actual cases among employees x 200,000/  
4 employee hours worked, where SIF Actual is counted using the methodology  
5 developed by the Edison Electric Institute’s (EEI) Occupational Safety and  
6 Health Committee (OS&HC) Safety and Classification Learning (SCL) Model.

7 If a utility has implemented a replicable, substantially similar evaluation  
8 methodology for assessing incidents where a SIF occurred, the utility may use  
9 that method for reporting this metric. If a utility opts to report the rate of SIF  
10 Actual using a method other than the EEI SCL Model, it must explain how its  
11 methodology for counting SIF-A differs and why it chose to use it.

12 As a supplemental reporting requirement to the SIF-A Rate for comparative  
13 purposes, all utilities shall also report SIF-A Rate data based on California  
14 Division of Occupational Safety and Health (Cal/OSHA) reporting requirements  
15 under Section 6409.1 of the California Labor Code

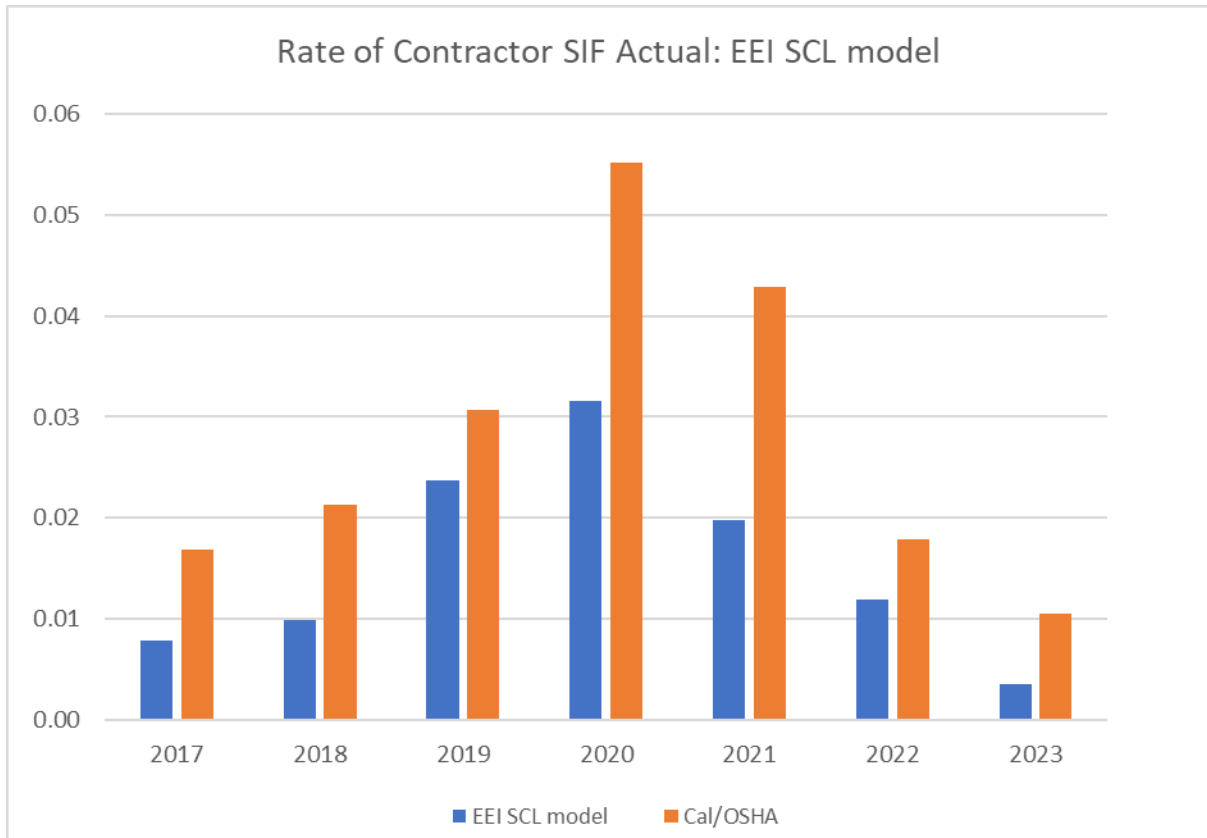
16 **Risks:** Contractor Safety Incident

17 **Category:** Injuries

18 **Units:** Rate of SIF Actual (SIF-A) cases among contractors x 200,000/contractor  
19 hours worked

**Summary:**

**FIGURE 5-16  
RATE OF SIF ACTUAL (CONTRACTOR) EEI SCL MODEL AND CAL/OSHA<sup>(a)</sup>  
DEFINITIONS COMPARISON**



- (a) Per Cal/OSHA, a serious injury or illness is defined as one involving inpatient hospitalization, regardless of length of time, for other than medical observation or diagnostic testing; amputation; loss of an eye; or serious degree of permanent disfigurement.

2 **Narrative Context:** Pacific Gas and Electric Company's (PG&E or the  
3 Company) SIF Program was deployed at the end of 2016 to establish a  
4 classification and cause evaluation process for coworker and contractor SIF.<sup>44</sup>  
5 The goal of PG&E's SIF Program is to reduce the number and severity of safety  
6 incidents that result in a SIF. The program objective is to learn from safety  
7 incidents by performing cause evaluations on each SIF-Actual (SIF-A) and SIF

<sup>44</sup> Per I.14-08-022, Kern Order Instituting Investigation (Kern OII) (Aug. 28, 2014) Settlement Agreement with California Public Utilities Commission (CPUC) see D.15-07-014.

1 Potential (SIF-P) incident, implementing corrective actions, and sharing key  
2 findings across the enterprise.

3 In August of 2020, PG&E adopted Edison Electric International's (EEI)  
4 Safety Classification Learning (SCL) Model to mature classification of its SIF  
5 incidents.<sup>45</sup> Adopting the EEI SCL Model has improved PG&E's SIF Program  
6 by bringing a consistent and objective approach to reviewing and classifying SIF  
7 incidents and identifying high-energy tasks. The EEI SCL model does not  
8 directly define a SIF-A, rather it classifies incidents into categories: High-Energy  
9 SIF (HSIF),<sup>46</sup> Low-Energy SIF (LSIF),<sup>47</sup> Potential SIF (PSIF),<sup>48</sup> Capacity,<sup>49</sup>  
10 Exposure,<sup>50</sup> Success,<sup>51</sup> and Low Severity.<sup>52</sup> The HSIF terminology is fairly  
11 new to the industry; however, it is equivalent to a SIF-A with regard to how  
12 serious life threatening, life-altering or fatalities are determined.<sup>53</sup>  
13 While PG&E uses the EEI SCL model methodology to classify and track SIF-A  
14 incidents, PG&E's SIF Program differs slightly from the EEI model in that PG&E  
15 includes all types of Motor Vehicle Incidents (MVI) in its SIF counts, whereas the  
16 EEI SCL model does not.<sup>54</sup> PG&E believes that all MVIs (even where any injury  
17 did not occur) should be considered for SIF potentiality and will continue to

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45 See, SCL Model at <https://esafetyline.net/eei/docs/eeiSCLmodel.pdf> at p. 17.

46 *Id.* at p. 17, HSIF is defined as: "Incident with a release of high energy in the absence of a direct control where a serious injury is sustained."

47 *Id.* at p. 17, LSIF is defined as: "Incident with a release of low energy in the absence of a direct control where a serious injury is sustained."

48 *Id.* at p. 17, 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."

49 *Id.* at p. 17, 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."

50 *Id.* at p. 17, Exposure is defined as: "Condition where high energy is present in the absence of a direct control."

51 *Id.* at p. 17, Success is defined as: "Condition where a high energy incident does not occur because of the presence of a direct control."

52 *Id.* at p. 17, Low Severity is defined as: "Incident with a release of low energy where no serious injury is sustained."

53 EEI Safety Classification and Learning (SCL) Model, SIF defined as Life-threatening or life-altering incident.

54 This has been discussed during learning sessions with EEI and conversations with the SCL author that some MVIs do not fit within the parameters of the SCL model. PG&E uses its own MVI SIF classification process per SAFE-1002S: Motor Vehicle Standard, which is outside the SCL model classification process.

1 include them in the SIF counts. This may differ slightly from how other utilities  
2 classify and categorize contractor MVIs.

3 This SPM definition includes the use of the EEI OS&HC serious injury  
4 criteria,<sup>55</sup> which defines a serious injury using fourteen specific injury criteria. In  
5 operation, and in discussions with other utilities and EEI, PG&E finds that the  
6 OS&HC criteria does not align with the life altering/life threatening aspects of the  
7 SIF Program objective and is in contradiction to the SCL model purpose. PG&E  
8 does, however, define serious injury in its SIF Program,<sup>56</sup> which is substantially  
9 similar to the OS&HC criteria. The difference is that PG&E considers life  
10 altering/life threatening a substantial factor in serious injury determination.<sup>57</sup>  
11 As allowed by CPUC SPM definition for a SIF-A (Employee) incident, PG&E  
12 uses substantially similar criteria to classify an injury as serious, as compared to  
13 the EEI OS&HC criteria including life threatening/life altering into the SIF-A  
14 determination. This determination also includes a third-party medical consultant  
15 to review and concur with the serious designation. This model allows the  
16 Company to focus its safety and risk mitigation efforts on the most serious  
17 outcomes and highest risk work where a high energy incident occurred.

18 There have been 26 contractor SIF-A incidents between 2017 and 2023,  
19 which include 13 fatalities and 13 serious injuries. There is no common thread  
20 between the incidents. The SIF-A events encompass broad job task types  
21 including, helicopter operations, dropped objects, vegetation management, MVI  
22 or Off-Highway Utility Vehicles, and electrical contacts. One contractor SIF-A

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**55** Occupational Safety & Health Committee: Serious Injury & Fatality Criteria (SIF) can be reviewed at:  
<https://images.magnetmail.net/images/clients/EEI //attach/Environment/hsif2022.pdf>.

**56** SAFE-1100S: Serious Injury or Fatality Standard, Appendix A Examples of a Serious Injury.

**57** PG&E defines a SIF-A (analogous to a EEI SCL HSIF) as: A work-related high-energy incident consequential from work at or for PG&E that results in any of the following to employees, contractors, or directly supervised contractors:

- A fatality – work-related fatal injury or illness;
- A life-threatening injury or illness that required immediate life-preserving action that if not applied immediately would likely have resulted in the death of that person;
- A life-altering injury or illness that resulted in a permanent and significant loss of a major body part or organ function.

1 motor vehicle incident occurred in 2023 which resulted in a fatality. There were  
2 no serious injuries.

3 With regard to Cal/OSHA reporting requirements, there were 3 contractor  
4 incidents reported as serious injuries.

5 Implementation of Contractor Safety Program (CSP), in addition to  
6 executing corrective actions will drive down incidents. The CSP, evaluated as  
7 part of the 2020 RAMP Report, is in progress through 2026. Please see Metric  
8 19 narrative for additional detail about the additional programs being  
9 implemented.

10 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
11 **or Higher) Compensation Levels and/or Incentives?**

12 No, in 2023, Rate of SIF-Actual (Contractor) was not used as a STIP metric.

13 **Is Metric Linked to the Determination of Individual or Group Performance**  
14 **Goals?**

15 Yes, Rate of SIF-Actual (Contractor) is linked to 2023 performance goals for  
16 one or more Director-level, or higher, position.

17 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

18 Yes, in 2023, the following position(s) include individual performance goals  
19 that are linked to Rate of SIF-Actual (Contractor).

- 20 • Chief: Engineering, Planning & Strategy (1), Generation (2), Human  
21 Resources & Enterprise Change Office (1)
- 22 • Director: Customer & Communications (1), Electric Engineering (1), Electric  
23 Operations (19), Engineering, Planning & Strategy (4), Enterprise Health &  
24 Safety (6), Gas Operations (5), Generation (16), Human Resources &  
25 Enterprise Change Office (2), Information Technology (2), Operations (28),  
26 Shared Services (7), Supply Chain (2)
- 27 • Senior Director: Customer & Communications (1), Electric Engineering (2),  
28 Electric Operations (9), Enterprise Health & Safety (4), Gas Engineering (1),  
29 Gas Operations (4), Generation (3), Operations (9), Shared Services (2)
- 30 • Vice President: Customer & Communications (2), Electric Operations (1),  
31 Enterprise Health & Safety (2), Gas Operations (1), Generation (2), Human

- 1 Resources & Enterprise Change Office (1), Operations (2), Shared  
2 Services (1)  
3 • Senior Vice President: Gas Engineering (1), Gas Operations (1),  
4 Generation (1)

5 **Bias Controls:** Data is compiled by the Enterprise Health & Safety Team.  
6 Contractor SIF events are reviewed weekly. IA performed a validation of the  
7 2023 metric performance and periodically validated the controls in 2023 in place  
8 for gathering metric data and the Utility's performance in meeting the metric.

9 **Rate Case Safety Goal Progress:** This metric is specifically stated in the 2023  
10 GRC<sup>58</sup> as a safety goal metric.

11 **Monthly Data:** See Attachment A at the end of this report.

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<sup>58</sup> PG&E 2023 GRC Exhibit (PG&E-7), Chapter 1, Safety and Health, p. 1-24.

1 **Metric 17: Rate of Serious Injuries or Fatalities (SIF) Potential (Employee)**

2 **Metric Name and Description:** Rate of SIF Potential (Employee) is calculated  
3 using the formula:

4 Number of SIF Potential cases among employees x 200,000/employee hours  
5 worked, where a SIF incident, in this case would be events that could have led  
6 to a reportable SIF. Potential SIF incidents are identified using the Edison  
7 Electric Institute (EEI) Safety Classification and Learning Model.<sup>59</sup>

8 If a utility has implemented a replicable, substantially similar evaluation  
9 methodology for assessing SIF Potential (SIF-P), the utility may use that method  
10 for reporting this metric. If a utility opts to report the rate of SIF-P using a  
11 method other than the EEI Safety Classification Model, it must explain how its  
12 methodology for counting SIF-P differs and why it chose to use it.

13 As a supplemental reporting requirement to the rate of SIF Potential (Employee),  
14 all utilities shall provide information about the key lessons learned from Potential  
15 SIF (Employee) incidents.

16 Findings from 2023 SIF Potential incident investigations show gaps in  
17 communication, skill-based errors and standards that are not well defined or  
18 understood. The implementation of the PG&E Safety Excellence Management  
19 System (PSEMS) and stronger focus on workforce safety initiatives, such as  
20 development and training of critical risk standards, enhancing the field safety  
21 observations program, and leader engagement are intended to close these  
22 gaps.

23 **Risks:** Employee Safety Incident

24 **Category:** Injuries and Near Hits

25 **Units:** Number of SIF-Potential (SIF-P) cases among employees x  
26 200,000/employee hours worked

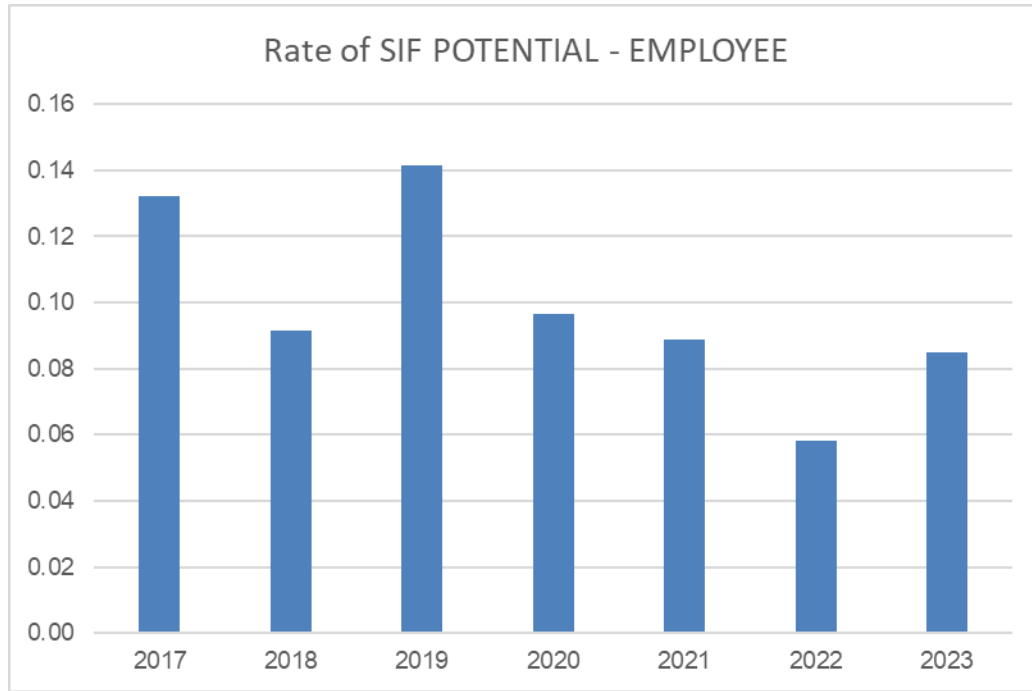
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59 Edison Electric Institute Safety Classification and Learning Model at:  
<https://esafetyline.net/eei/docs/eeiSCLmodel.pdf>.



1 **Summary:**

**FIGURE 5-17**  
**RATE OF SERIOUS INJURIES OR FATALITIES (SIF) POTENTIAL (EMPLOYEE)**



2 **Narrative Context:** PG&E’s SIF Program was deployed at the end of 2016 to  
3 establish a classification and cause evaluation process for coworker and  
4 contractor serious injuries or fatalities.<sup>60</sup> The goal of PG&E’s SIF program is to  
5 reduce the number and severity of safety incidents that result in a SIF. The  
6 program objective is to learn from safety incidents by performing cause  
7 evaluations on each SIF-Actual (SIF-A) and SIF Potential (SIF-P) incident,  
8 implementing corrective actions, and sharing key findings across the enterprise.  
9 As such, this metric is considered bi-directional as a higher rate can indicate that  
10 employees have an increased willingness to report SIF Potential incidents. As  
11 part of PG&E’s Speak Up culture, employees and contractors are encouraged to  
12 report all safety incidents. Leaders are expected to create the space for workers  
13 to feel comfortable to speak up and escalate safety concerns and failures.

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<sup>60</sup> Per Investigation 14-08-022, Kern Order Instituting Investigation (Kern OII) (Aug. 28, 2014) Settlement Agreement with California Public Utilities Commission see Decision 15-07-014.

1 From 2016 to mid-2020, SIF-P classification was based on the reasonable  
2 chance that the incident could have resulted in a SIF-A.<sup>61</sup> This classification  
3 was subjective and left room for interpretation. In August of 2020, PG&E  
4 adopted Edison Electric International’s Safety Classification Learning (SCL)  
5 Model to classify its serious injury or fatality (SIF) incidents.<sup>62</sup> Adopting the EEI  
6 SCL Model improved PG&E’s SIF program by bringing a consistent and  
7 objective approach to reviewing and classifying SIF incidents and identifying  
8 high-energy tasks. The EEI SCL model classifies incidents into very distinct  
9 categories: High-Energy SIF (HSIF),<sup>63</sup> Low-Energy SIF (LSIF),<sup>64</sup> Potential SIF  
10 (PSIF),<sup>65</sup> Capacity,<sup>66</sup> Exposure,<sup>67</sup> Success<sup>68</sup> & Low Severity.<sup>69</sup> PG&E has  
11 fully adopted the PSIF terminology into its SIF Program.<sup>70</sup>

12 While PG&E uses the EEI SCL model methodology to classify and track SIF  
13 incidents, PG&E’s SIF program differs slightly from the EEI model in that PG&E  
14 includes all types of Motor Vehicle Incidents (MVI) in its SIF counts, whereas the  
15 EEI SCL model does not.<sup>71</sup> PG&E believes that all motor vehicle incidents

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61 SAFE-1100P-01 Rev.0 Published 03/31/0217.

62 See, SCL Model at <https://esafetyline.net/eei/docs/eeiSCLmodel.pdf> at p. 17.

63 *Id.* at p. 17, HSIF is defined as: “Incident with a release of high energy in the absence of a direct control where a serious injury is sustained.”

64 *Id.* at p. 17, LSIF is defined as: “Incident with a release of low energy in the absence of a direct control where a serious injury is sustained.”

65 *Id.* at p. 17, 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.”

66 *Id.* at p. 17, 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.”

67 *Id.* at p. 17, Exposure is defined as: “Condition where high energy is present in the absence of a direct control.”

68 *Id.* at p. 17, Success is defined as: “Condition where a high energy incident does not occur because of the presence of a direct control.”

69 *Id.* at p. 17, Low Severity is defined as: “Incident with a release of low energy where no serious injury is sustained.”

70 SAFE-1100S Rev 5, p. 10. Also, see SAFE-1100S Rev 5 Attachment 1, SIF Determination Flowchart

71 This has been discussed during learning sessions with EEI and conversations with the SCL author that some MVI’s do not fit within the parameters of the SCL model. PG&E uses its own MVI SIF classification process per SAFE-1002S: Motor Vehicle Standard, which is outside the SCL model classification process.

1 (even where any injury did not occur) should be considered for SIF potentiality  
2 and will continue to include them in the SIF counts. This may differ slightly from  
3 how other utilities classify and categorize MVIs.

4 In 2021 through 2023, PG&E saw a slight decrease in SIF-P Employee  
5 incidents. The most common events involved motor vehicle incidents. Motor  
6 vehicle program improvements have been taken to address employee incidents  
7 including, installing driver technology to monitor and track driver habits, i.e.,  
8 acceleration, hard braking, speed, etc.

9 Continued measures are being implemented by the addition of the Regional  
10 Safety Directors through safety campaigns and communications and  
11 problem-solving sessions. The implementation of the Enterprise Safety  
12 Management System and stronger focus on workforce safety initiatives, such as  
13 development of critical risk standards, enhancing the field safety observations  
14 program, leader engagement, and lean operating model, is expected to continue  
15 to reduce this trend.

16 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
17 **or Higher) Compensation Levels and/or Incentives?**

18 No, in 2023, Rate of SIF Potential (Employee) was not used as a STIP  
19 metric.

20 **Is Metric Linked to the Determination of Individual or Group Performance**  
21 **Goals?**

22 Yes, Rate of SIF Potential (Employee), is linked to 2023 individual or group  
23 performance goals as described in the next section.

24 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

25 Yes, Rate of SIF Potential (Employee), is linked to 2023 individual  
26 performance goals for Director-level, or higher, positions.

- 27 • **Chief:** Enterprise Health and Safety (1), Generation (2), Human Resources  
28 & Enterprise Change Office (1)
- 29 • **Director:** Customer & Communications (1), Electric Engineering (1),  
30 Electric Operations (19), Engineering, Planning & Strategy (1), Enterprise  
31 Health and Safety (6), Gas Operations (11), Generation (16), Human

- 1 Resources & Enterprise Change Office (2), Information Technology (2),  
2 Operations (28), Shared Services (7), Supply Chain (2)
- 3 • **Senior Director:** Customer & Communications (2), Electric Engineering (1),  
4 Electric Operations (9), Enterprise Health & Safety (4), Gas Engineering (1),  
5 Gas Operations (6), Generation (3), Operations (9), Shared Services (2)
  - 6 • **Vice President:** Customer & Communications (2), Electric Operations (1),  
7 Enterprise Health & Safety (1), Gas Operations (2), Generation (2),  
8 Operations (2), Human Resources & Enterprise Change Office (1),  
9 Operations (2), Shared Services (1)
  - 10 • **Senior Vice President:** Gas Engineering (1), Generation (1)
  - 11 • **Bias Controls:** SIF events are reviewed weekly by Enterprise Health &  
12 Safety

13 **Rate Case Safety Goal Progress:** This metric is not specifically stated in the  
14 2023 GRC as a safety goal metric. This metric is tracked internally as track and  
15 trend only.

16 **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 18: Rate of Serious Injuries or Fatalities (SIF) Potential (Contractor)**

2 **Metric Name and Description:** Rate of SIF Potential (contractor) is calculated  
3 using the formula:

4 Number of SIF Potential cases among contractors x 200,000/contractor hours  
5 worked, where a SIF incident, in this case would be events that could have led  
6 to a reportable SIF. Potential SIF incidents are identified using the EEI Safety  
7 Classification and Learning Model.<sup>72</sup>

8 If a utility has implemented a replicable, substantially similar evaluation  
9 methodology for assessing SIF Potential (SIF-P), the utility may use that method  
10 for reporting this metric. If a utility opts to report the rate of SIF-P using a  
11 method other than the EEI Safety Classification Model, it must explain how its  
12 methodology for counting SIF-P differs and why it chose to use it.

13 As a supplemental reporting requirement to the Rate of SIF Potential  
14 (Contractor), all utilities shall provide information about key lessons learned from  
15 SIF-P (Contractor) incidents.

16 Findings from 2023 SIF Potential incident investigations show gaps in  
17 communication and job safety analysis completion, skill-based knowledge, and  
18 safe work standards and procedures that are not well defined or understood.

19 Continuous improvement of the Contractor Safety pre-qualification and  
20 Functional Area oversight programs to address program gaps include Contractor  
21 Safety Quality Assurance Reviews (CSQARs) which are conducted with  
22 selected Contractors with adverse trends in safety performance and who are at  
23 risk of experiencing a Serious Injury or Fatality and, implementation of the SIF  
24 Capacity & Learning model which redefines safety as measured by the presence  
25 of essential controls and the ability to experience failures safely.

26 Also expected to help reduce SIF P events involving contractors is the  
27 implementation of the PG&E Safety Excellence Management System (PSEMS)

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<sup>72</sup> Edison Electric Institute Safety Classification and Learning Model at:  
<https://esafetyline.net/eei/docs/eeiSCLmodel.pdf>.

1 and stronger focus on workforce safety initiatives, such as development of  
2 critical risk standards, enhancing the field safety observations program, leader  
3 engagement, and lean operating model.

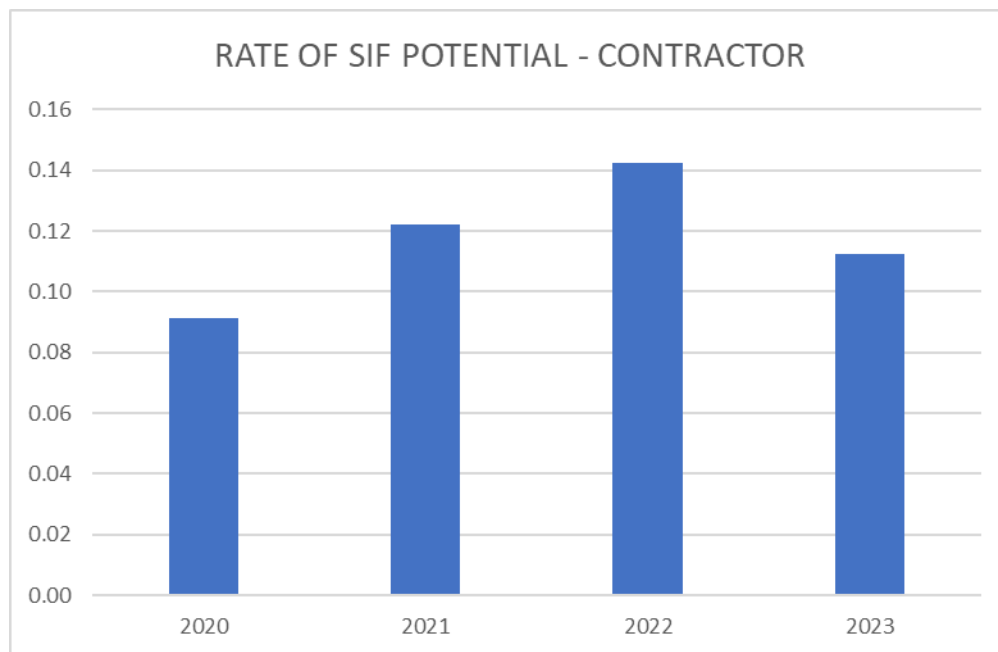
4 **Risks:** Contractor Safety Incident

5 **Category:** Injuries & Near Hits

6 **Units:** Number of SIF-Potential (SIF-P) cases among employees x  
7 200,000/contractor hours worked

8 **Summary:**

**FIGURE 5-18**  
**RATE OF SERIOUS INJURIES OR FATALITIES (SIF) POTENTIAL (CONTRACTOR)**



9 **Narrative Context:** PG&E’s Serious Injury or Fatality (SIF) program was  
10 deployed at the end of 2016 to establish a classification and cause evaluation  
11 process for coworker and contractor serious injuries or fatalities.<sup>73</sup> The goal of  
12 PG&E’s SIF program is to reduce the number and severity of safety incidents  
13 that result in a SIF. The program objective is to learn from safety incidents by

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<sup>73</sup> Per I.14-08-022, Kern Order Instituting Investigation (Kern OII) (Aug. 28, 2014) Settlement Agreement with California Public Utilities Commission see Decision 15-07-014.

1 performing cause evaluations on each SIF-Actual (SIF-A) and SIF Potential  
2 (SIF-P) incident, implementing corrective actions, and sharing key findings  
3 across the enterprise. As such, this metric is considered bi-directional as a  
4 higher rate can indicate that employees and contractors have an increased  
5 willingness to report SIF Potential incidents. As part of PG&E’s Speak Up  
6 culture, employees and contractors are encouraged to report all safety incidents.  
7 In June of 2020, PG&E expanded the SIF program to include investigating  
8 contractor incidents rising to SIF-P classification.<sup>74</sup> This increased the number  
9 and types of injuries and incidents that contractors are required to report in 2020  
10 through 2022. Prior to 2020, only contractor incidents that resulted in a SIF-A<sup>75</sup>  
11 were investigated by PG&E. The contractor was responsible for investigating all  
12 other incidents and reporting action plans back to PG&E.  
13 From 2017 to mid-2020, SIF-P classification was based on the reasonable  
14 chance that the incident could have resulted in a SIF-A.<sup>76</sup> This classification  
15 was subjective and left room for interpretation. In August of 2020, PG&E  
16 adopted Edison Electric International’s Safety Classification Learning (SCL)  
17 Model to classify its serious injury or fatality (SIF) incidents.<sup>77</sup> Adopting the EEI  
18 SCL Model improved PG&E’s SIF program by bringing a consistent and  
19 objective approach to reviewing and classifying SIF incidents and identifying  
20 high-energy tasks. The EEI SCL model classifies incidents into very distinct  
21 categories: High-Energy SIF (HSIF),<sup>78</sup> Low-Energy SIF (LSIF),<sup>79</sup> Potential SIF

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**74** SAFE-1100S-B001: Contractor SIF-P Incidents: Requiring SIF-P Incidents and Cause Evaluations Published 6/2020.

**75** Per SAFE-1100S Rev.00 (2017): Serious Injury or Fatality Standard, an incident resulting in a fatality or serious injury that was life threatening or life altering.

**76** SAFE-1100P-01 Rev.0 Published 03/31/0217.

**77** See, SCL Model at <https://esafetyline.net/eei/docs/eeiSCLmodel.pdf> at p. 17.

**78** *Id.* at p. 17, HSIF is defined as: “Incident with a release of high energy in the absence of a direct control where a serious injury is sustained.”

**79** *Id.* at p. 17, LSIF is defined as: “Incident with a release of low energy in the absence of a direct control where a serious injury is sustained.”

1 (PSIF),<sup>80</sup> Capacity,<sup>81</sup> Exposure,<sup>82</sup> Success<sup>83</sup> & Low Severity.<sup>84</sup> PG&E has  
2 fully adopted the PSIF terminology into its SIF Program.<sup>85</sup>

3 While PG&E uses the EEI SCL model methodology to classify and track SIF  
4 incidents, PG&E's SIF program differs slightly from the EEI model in that PG&E  
5 includes all types of Motor Vehicle Incidents (MVI) in its SIF counts, whereas the  
6 EEI SCL model does not.<sup>86</sup> PG&E believes that all motor vehicle incidents  
7 (even where any injury did not occur) should be considered for SIF potentiality  
8 and will continue to include them in the SIF counts. This may differ slightly from  
9 how other utilities classify and categorize MVIs.

10 Between 2020 and 2023, there have been a total of 131 SIF-P contractor  
11 incidents. The most common events involved electrical contacts, motor vehicle  
12 incidents and falls from heights (electrical poles and trees). As discussed  
13 above, PG&E is continuing to implement Contractor Safety pre-qualification and  
14 Functional Area oversight program improvements through the Regional Safety  
15 Directors including safety campaigns and communications, problem-solving  
16 sessions, and contractor safety oversight improvement.

17 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
18 **or Higher) Compensation Levels and/or Incentives?**

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80 *Id.* at p. 17, 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."

81 *Id.* at p. 17, 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."

82 *Id.* at p. 17, Exposure is defined as: "Condition where high energy is present in the absence of a direct control."

83 *Id.* at p. 17, Success is defined as: "Condition where a high energy incident does not occur because of the presence of a direct control."

84 *Id.* at p. 17, Low Severity is defined as: "Incident with a release of low energy where no serious injury is sustained."

85 SAFE-1100S Rev 5, p. 10. Also, see SAFE-1100S Rev 5 Attachment 1, SIF Determination Flowchart.

86 This has been discussed during learning sessions with EEI and conversations with the SCL author that some MVI's do not fit within the parameters of the SCL model. PG&E uses its own MVI SIF classification process per SAFE-1002S: Motor Vehicle Standard, which is outside the SCL model classification process.



1 No, in 2023, Rate of SIF Potential (contractor), was not used as a STIP  
2 metric.

3 **Is Metric Linked to the Determination of Individual or Group Performance**  
4 **Goals?**

5 Yes, Rate of SIF Potential (contractor), is linked to 2023 individual or group  
6 performance goals for one or more Director-level, or higher, position.

7 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

8 Yes, in 2023, the following position(s) include individual performance goals  
9 that are linked to Rate of SIF Potential (Contractor).

- 10 • **Chief:** Enterprise Health and Safety (1), Human Resources & Enterprise  
11 Change Office (1)
- 12 • **Director:** Customer & Communications (1), Electric Engineering (1),  
13 Electric Operations (19), Engineering, Planning & Strategy (3), Enterprise  
14 Health and Safety (6), Gas Operations (4), Generation (7), Human  
15 Resources & Enterprise Change Office (2), Information Technology (1),  
16 Operations (24), Shared Services (8), Supply Chain (1)
- 17 • **Senior Director:** Customer & Communications (1), Electric Engineering (1),  
18 Electric Operations (9), Enterprise Health & Safety (4), Gas Engineering (1),  
19 Gas Operations (4), Generation (1), Operations (9), Shared Services (2)
- 20 • **Vice President:** Customer & Communications (2), Electric Operations (1),  
21 Enterprise Health & Safety (1), Gas Operations (1), Generation (1), Human  
22 Resources & Enterprise Change Office (1), Operations (2), Shared Services  
23 (1)
- 24 • **Senior Vice President:** Gas Engineering (1), Generation (1)

25 **Bias Controls:** SIF events are reviewed weekly by Enterprise Health & Safety

26 **Rate Case Safety Goal Progress:** A rate of SIF Potential (Contractor) metric is  
27 not stated in the 2023 GRC Safety and Health chapter (Chapter 1). This metric  
28 is tracked internally as track and trend only.

29 **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 19: Contractor DART**

2 **Metric Name and Description:** Contractor DART – DART Rate: DART Cases  
3 include OSHA recordable LWD Cases and injuries that involve job transfer or  
4 restricted work activity. DART Rate is calculated as DART Cases times 200,000  
5 divided by contractor hours worked.<sup>87</sup>

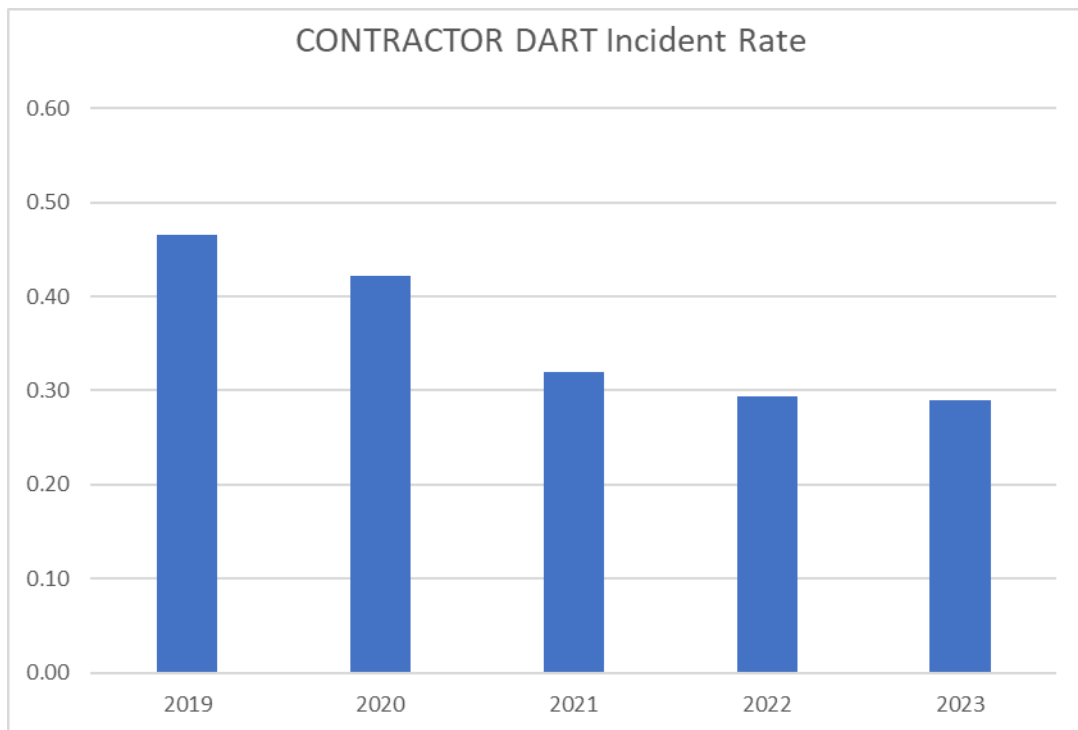
6 **Risks:** Contractor Safety Incident<sup>88</sup>

7 **Category:** Injuries

8 **Units:** OSHA recordable times 200,000 divided by contractor hours worked  
9 associated with work for the reporting utility

10 **Summary:**

**FIGURE 5-19  
CONTRACTOR DART RATE METRIC DATA (ANNUAL)**



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<sup>87</sup> Contractors included are performing medium to high-risk work.

<sup>88</sup> The Corporate Risk Register includes the following risk: Contractor Safety Incident.

1 **Narrative Context:** Contractor DART case rate data became available with the  
2 implementation of the Contractor Safety Program which was fully in place at the  
3 beginning of 2017. Pacific Gas and Electric Company (PG&E) did not track this  
4 metric prior to 2017. Data show that DART case rates for PG&E contractors  
5 decreased from 2018 through 2023 with the increase in the PG&E contractor  
6 workforce. This is due to the continuous improvement of the Contractor Safety  
7 pre-qualification and Functional Area oversight programs. Planned program  
8 mitigations include Contractor Safety Quality Assurance Reviews (CSQARs)  
9 which are conducted with selected Contractors with adverse trends in safety  
10 performance and who are at risk of experiencing a Serious Injury or Fatality and,  
11 implementation of the SIF Capacity & Learning model which redefines safety as  
12 measured by the presence of essential controls and the ability to experience  
13 failures safely.

14 **Is Metric Used for the Purposes of Determining Executive (Director Level  
15 or Higher) Compensation Levels and/or Incentives?**

16 No, in 2023, Contractor DART – DART Rate was not used as a STIP metric.

17 **Is Metric Linked to the Determination of Individual or Group Performance  
18 Goals?**

19 Yes, Contractor DART – DART Rate is linked to 2023 individual or group  
20 performance goals for one or more Director-level, or higher, position.

21 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

22 Yes, in 2023, the following position(s) include individual performance goals  
23 that are linked to Contractor DART – DART Rate:

- 24 • **Chief:** Generation (2)
- 25 • **Director:** Corporate Affairs (1), Electric Engineering (1), Electric Operations  
26 (14), Engineering, Planning & Strategy (3), Gas Operations (3), Generation  
27 (13), Operations (2), Information Technology (1), Shared Services (1) ,  
28 Supply Chain (1)
- 29 • **Senior Director:** Customer & Communications (1), Electric Engineering (2),  
30 Electric Operations (6), Generation (3), Operations (2), Shared Services (1)
- 31 • **Vice President:** Customer & Communications (1), Electric Operations (2),  
32 Gas Operations (1), Generation (2)

1       •   **Senior Vice President:** Gas Operations (1), Generation (1)

2       **Bias Controls:** OSHA regulates the definition of a DART case. The PG&E  
3       specific information is self-reported by the contractors. The contractor company  
4       OSHA logs are verified annually by an external third party.

5       **Rate Case Safety Goal Progress:** This metric was not a stated metric in the  
6       2023 GRC Enterprise Safety and Health chapter (Chapter 1). The Narrative  
7       Context section above summarizes the continued steps PG&E is taking to  
8       reduce the Contractor DART Rate.

9       **Monthly Data:** See Attachment A at the end of this report.

1       **Metric 20: Public SIF**

2       **Metric Name and Description:** Public serious injuries or fatalities (SIF) –  
3       A fatality or personal injury requiring in-patient hospitalization involving utility  
4       facilities or equipment. Equipment includes utility vehicles used during the  
5       course of business.

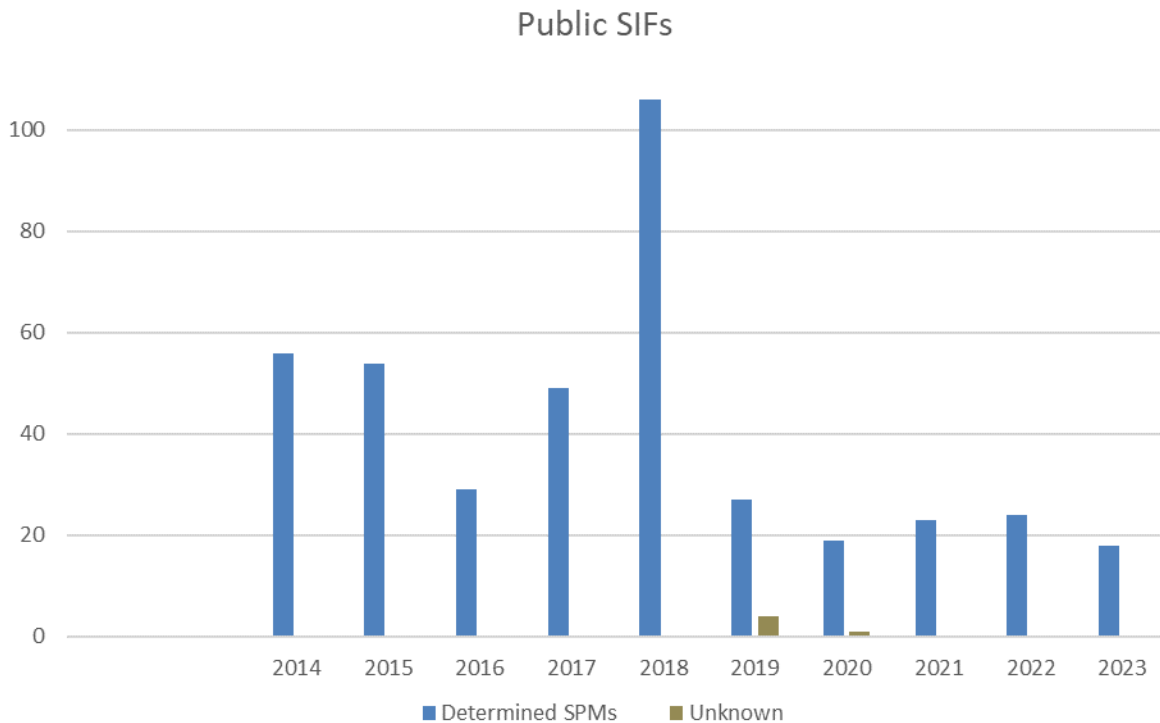
6       **Risks:** For the 2024 Risk Assessment and Mitigation Phase (RAMP) filing,  
7       Public Contact with Intact Energized Electrical Equipment replaces the  
8       Third-Party Safety Incident risk (Public Safety).

9       **Category:** Injuries

10      **Units:** Number of SIF

11      **Summary:**

**FIGURE 5-20  
PUBLIC SIF METRIC DATA (ANNUAL)**



Note: At this time PG&E has included injuries reported with the Kincadee (2019), and Zogg (2020) wildfires as unknown subject to additional review.

1 **Narrative Context:** The Public SIF metric includes all public safety incidents  
 2 involving a Pacific Gas and Electric Company (PG&E) asset, where a member of  
 3 the public was seriously injured, regardless of assigned fault. The data is  
 4 reported by the total number of injuries per incident. In general, the number of  
 5 Public SIF incidents (and injuries) has trended down since 2014, with the  
 6 exception of the incidents in 2018 due to wildfires. Excluding wildfire, the  
 7 primary drivers for the incidents include motor vehicle/distribution pole incidents,  
 8 third-party electrical contact, and incidents on PG&E hydroelectric owned or  
 9 managed property including drownings.<sup>89</sup>

10 In 2023, there were 18 confirmed Public Safety Incidents meeting the Safety  
 11 Performance Metric Public SIF definition (involving a PG&E asset regardless of

<sup>89</sup> For Fire Ignition metric information see Metric 4. For electrical contact information see Metrics 1 and 2. Public SIF related to the failure of an asset are included in the risk analysis for asset-based event risks.

1 fault) that resulting in 11 serious injuries and 7 fatalities. The confirmed public  
2 incidents included:

- 3 • Eight electrical contacts (4 serious injuries, 4 fatalities);
- 4 • One car-pole incident (1 serious injury);
- 5 • Five Company or Contractor Motor Vehicle Incidents (4 serious injuries,  
6 1 fatality);
- 7 • Three incidents involving members of the public using a PG&E owned or  
8 managed recreational area (3 fatalities due to drowning); and
- 9 • One Job Site incident (1 serious injury).
- 10 • One wires down (de-energized) and motorcycle involvement.

11 The downward trend in public safety incidents can be attributed to the  
12 broader asset management programs in Electric Operations (EO) (including  
13 Wildfire mitigation), Gas Operations (GO) and Power Generation. It should be  
14 noted that four Public SIF incidents not previously reported have been added to  
15 the 2023 report. They include:

- 16 • 3/27/2022 – MVI (Third Party Involved) – Bicycle collision resulting in a  
17 serious injury;
- 18 • 5/4/2022 – Electric Contact – Car pole resulted in a low hanging and  
19 subsequent fire. Third party attempted to put out the fire and contacted the  
20 energized line resulting in a serious injury;
- 21 • 10/18/2022 – Electric Contact – Third party vehicle hit a pole and caused it  
22 to fall into the street. Another vehicle made contact with the pole or guy wire  
23 and caused the guy wire to strike a third party individual resulting in a  
24 serious injury;
- 25 • 12/26/2022 – car pole fatality (added March 7, 2024, not included in the  
26 January 31, 2024, submittal); and
- 27 • 9/30/2023 – Third party motorcyclist contact with de-energized wires down  
28 (reported February 10, 2024, not included in the January 31, 2024,  
29 submittal).

30 In 2020, a risk was added to the PG&E enterprise risk register to place  
31 increased emphasis on Public SIFs that are unrelated to a PG&E asset failure or  
32 incorrect operations. The 2024 RAMP filing will include the 3rd-Party (Human)  
33 Contact with Intact Electric Equipment risk which focuses on public contact with  
34 intact energized .lines Risk reduction leverages Functional Area (previously

1 Line of Business) controls and mitigations specific to public safety including EO,  
2 GO, and Hydroelectric Operations Public Awareness and Job Site Safety  
3 programs, EO Transmission and Distribution safety design requirements, GO  
4 physical security controls including Meter Protection, and Hydroelectric Dam  
5 Surveillance monitoring and warning systems and signage.

6 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
7 **or Higher) Compensation Levels and/or Incentives?**

8 No, in 2023, Public SIF was not used as a STIP metric.

9 **Is Metric Linked to the Determination of Individual or Group Performance**  
10 **Goals?**

11 Yes, Public SIF, is linked to 2023 individual or group performance for one or  
12 more Director-level, or higher, position.

13 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

14 Yes, in 2023, the following position(s) include individual performance goals  
15 that are linked to Public SIF:

- 16 • **Chief:** Generation (2), Operations (1)
- 17 • **Director:** Engineering Planning & Strategy (3), Gas Operations (7),  
18 Generation (15), Shared Services (4), Supply Chain (1)
- 19 • **Senior Director:** Gas Operations (2), Generation (3), Operations (1),  
20 Shared Services (1)
- 21 • **Vice President:** Generation (2), Gas Operations (1)
- 22 • **Senior Vice President:** Generation (1)

23 **Bias Controls:** This data is reviewed and compiled by PG&E's Law  
24 Department. IA performed a validation of the 2023 metric performance.

25 **Rate Case Safety Goal Progress:** The Third-Party Safety Incident risk was  
26 added to the PG&E event-based risk register in 2020 to place greater emphasis  
27 on third party safety incidents that do not involve the failure of a PG&E asset. A  
28 third-party safety incident metric is not stated in the 2023 GRC Safety and  
29 Health chapter (Chapter 1).



1           The Public SIF metric dataset was used with the 2020 RAMP<sup>90</sup> and 2024  
2 RAMP analyses. For the 2024 RAMP filing this risk has been refined to Public  
3 Contact with Intact Energized Electrical Equipment to place greater emphasis on  
4 hazards associated with intact and energized electrical equipment.

5           See the Narrative Context explanation above for explanation of steps PG&E  
6 is taking to reduce the Public SIF rate.

7           **Monthly Data:** See Attachment A at the end of this report.

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<sup>90</sup> PG&E 2020 RAMP Report, Chapter 15, Risk Mitigation Plan: Third-Party Safety Incident.

1 **Metric 21: Helicopter/Flight Accident or Incident**

2 **Metric Name and Description:** Helicopter/Flight Accident or Incident – Defined  
 3 by Federal Aviation Regulations, reportable to the Federal Aviation  
 4 Administration per 49 Code of Federal Regulations (CFR) Section 830.

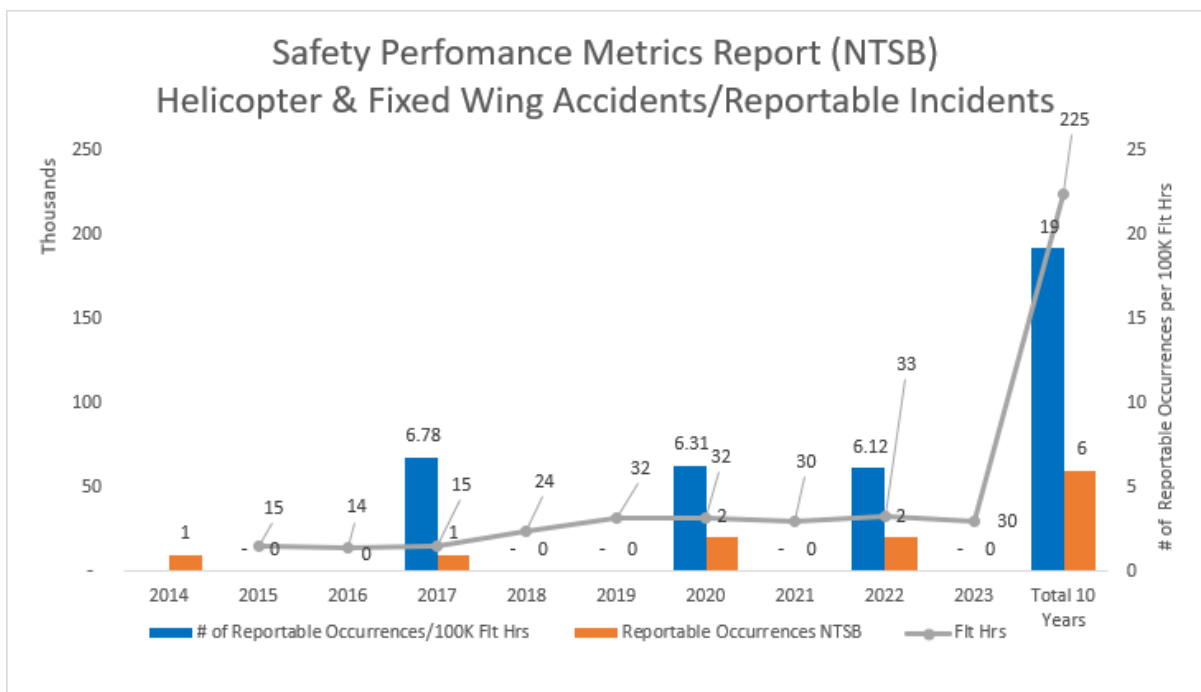
5 **Risks:** Aviation Incident, Public Contact with Intact Energized Electrical  
 6 Equipment, Contractor Safety Incident, and Employee Safety Incident.<sup>91</sup>

7 **Category:** Vehicle

8 **Units:** Number of accidents or incidents (as defined in 49 CFR Section 830.5  
 9 “Immediate Notification”) per 100,000 flight hours.

10 **Summary:**

**FIGURE 5-21  
 HELICOPTER/FLIGHT ACCIDENT OR INCIDENT METRIC DATA (ANNUAL)**



Note: Annual flight data for 2014 is not provided due to lower confidence in accuracy.

<sup>91</sup> The Corporate Risk Register now has the following risks: Aviation Incident, Employee Safety Incident, Contractor Safety Incident, and Public Contact with Intact Energized Electrical Equipment.

1 **Narrative Context:** For the past 10 years, there have been six reportable  
2 incidents per 49 CFR 830.5.

3 There were no reportable incidents in 2023.

4 **Risk Reduction Measures:**

- 5 • Helicopter Operations contracted a third-party auditor to conduct a gap  
6 analysis of all Helicopter Contractors to the International Standards for  
7 Business Aviation Organization (IS-BAO). This gap analysis was reviewed  
8 with all the contractors to support their pursuit of IS-BAO certification.  
9 Forty percent have obtained the certification in 2023.
- 10 • Helicopter Operations has reduced the number of helicopter contractors by  
11 52%, improving management oversight.
- 12 • Aviation services developed and implemented a comprehensive training and  
13 qualification program for all internal and external FAA-licensed pilots.
- 14 • In 2023, Aviation Services, Fixed Wing Operations completed a third-party  
15 audit and was granted Stage II certification by the International Standards  
16 for Business Aviation Organization (IS-BAO), and is preparing for their  
17 Stage III certification in 2025.
- 18 • Aviation Services deployed the first phase of their newly developed Flight  
19 Management System (FMS) software package, improving their process  
20 adherence and controls, support a new technical review process, and  
21 provide improved flight data management and operational control.

22 **Is Metric Used for the Purposes of Determining Executive (Director Level  
23 or Higher) Compensation Levels and/or Incentives?**

24 No, in 2023, Helicopter/Flight Accident or Incident was not as a STIP metric.

25 **Is Metric Linked to the Determination of Individual or Group Performance  
26 Goals?**

27 Yes, Helicopter/Flight Accident or Incident is linked to 2023 individual or  
28 group performance goals for one or more Director-level, or higher, position.

29 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

30 Yes, in 2023, the following position(s) include individual performance goals  
31 that are linked to Helicopter/Flight Accident or Incident:

- 1 • **Director:** Shared Services (1)
- 2 • **Vice President:** Shared Services (1)

3 **Bias Controls:** None.

4 **Rate Case Safety Goal Progress:** This metric does not represent a 2023 GRC  
5 stated safety goal. This metric is a key risk indicator for the Aviation Incident  
6 risk.

7 **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 22: Percentage of Serious Injury and Fatality (SIF) Corrective**  
2 **Actions Completed on Time**

3 **Metric Name and Description:** percentage of Serious Injury or Fatality (SIF)  
4 Corrective Actions Completed on Time. A SIF corrective action is one that is  
5 tied to a SIF actual or potential injury or near hit.

6 **Risks:** Employee Safety Incident, Contractor Safety Incident, and Motor Vehicle  
7 Safety Incident.<sup>92</sup>

8 **Category:** Injuries and Near Hits

9 **Units:** Total number of SIF corrective actions completed on time (as measured  
10 by the due date accepted by LOB Corrective Action Review Boards) divided by  
11 the total number of SIF corrective actions past due or completed.

12 **Summary:**

**FIGURE 5-22**  
**SIF TIMELINESS OF CORRECTIVE ACTIONS METRIC DATA (ANNUAL)**



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<sup>92</sup> The Corporate Risk Register now has the following risks Employee Safety Incident, Contractor Safety Incident, and Motor Vehicle Safety Incident.

1 **Narrative Context:** Corrective action timeliness is a key ingredient to ensuring  
2 that measures are taken to strengthen the capacity to work safe while  
3 performing high-energy job tasks by implementing effective direct controls.  
4 Between 2017 and 2019, Pacific Gas and Electric Company (PG&E) had an  
5 average corrective action timeliness rate of 96-percent. In 2020, it dropped to  
6 79-percent. The drop in 2020 can largely be attributed to the pandemic, which  
7 caused cancellations of field visits and delayed shipment of tools or materials  
8 required to complete corrective actions on time. In addition, in 2020, PG&E  
9 prohibited the extension of any corrective actions related to SIF incidents,  
10 without justification and the Chief Safety Officer's approval. In previous years,  
11 approval to extend due dates was based on the line of business action owner  
12 and their leadership. Since 2021, corrective actions have been consistently  
13 completed on time with annual average of 97 to 98 percent.

14 PG&E continues to monitor and review corrective actions on a weekly basis  
15 to ensure the support, tools and resources are available to complete actions on  
16 time and with quality.

17 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
18 **or Higher) Compensation Levels and/or Incentives?**

19 No, in 2023, percentage of Serious Injury or Fatality (SIF) Corrective Actions  
20 Completed on Time was not used as a STIP metric.

21 **Is Metric Linked to the Determination of Individual or Group Performance**  
22 **Goals?**

23 Yes, percentage of Serious Injury or Fatality (SIF) Corrective Actions  
24 Completed on Time is linked to 2023 individual or group performance goals for  
25 one or more Director-level, or higher, position.

26 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

27 Yes, in 2023, the following position(s) include individual performance goals  
28 that are linked to percentage of Serious Injury or Fatality (SIF) Corrective  
29 Actions Completed on Time:

- 30 • **Director:** Customer & Communications (1); Enterprise Health & Safety (2),  
31 Operations (1)

32 **Bias Controls:** None

- 1 **Rate Case Safety Goal Progress:** This metric was a stated Key Safety Metric
- 2 in Table 1-1 of the 2023 GRC testimony on Safety and Health.<sup>93</sup>
- 3 **Monthly Data:** See Attachment A at the end of this report.

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<sup>93</sup> PG&E GRC Exhibit (PG&E-7), Chapter 1, Safety and Health, p. 1-22.

1 **Metric 23: Hard Brake Rate**

2 **Metric Name and Description:** Hard Brake Rate – The total number of hard  
3 braking events (greater than or equal to 8 mph per second decrease in speed)  
4 per thousand miles driven in a given period.

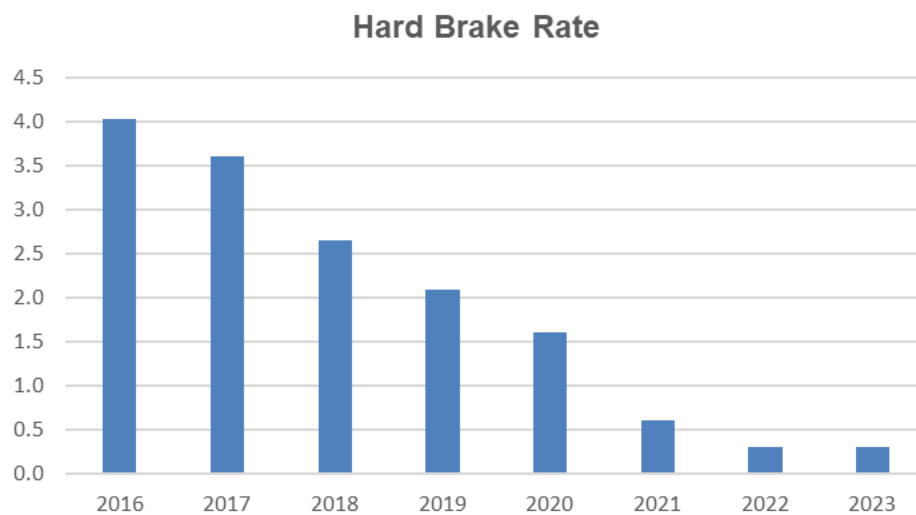
5 **Risks:** Motor Vehicle Safety Incident<sup>94</sup>

6 **Category:** Vehicle

7 **Units:** Total number of hard braking events per thousand miles driven in a  
8 given period.

9 **Summary:**

**FIGURE 5-23  
HARD BRAKE RATE METRIC DATA (ANNUAL)**



10 **Narrative Context:** PG&E began tracking the hard brake rate metric in 2016.  
11 The hard brake rate has been in steady decline between 2016 and 2023 with  
12 2023 remaining relatively the same as 2022. During the 2022-2023 time period,  
13 the number of vehicles tracking hard braking has also remained relatively the  
14 same.

---

<sup>94</sup> The Corporate Risk Register now has the following risks: Motor Vehicle Safety Incident.



1 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
2 **or Higher) Compensation Levels and/or Incentives?**

3 No, in 2023, Hard Brake Rate was not used as a STIP metric.

4 **Is Metric Linked to the Determination of Individual or Group Performance**  
5 **Goals?**

6 Yes, Hard Brake Rate is linked to 2023 individual or group performance  
7 goals for one or more Director-level, or higher, position.

8 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

9 Yes, in 2023, the following position(s) include individual performance goals  
10 are linked to Hard Brake Rate :

- 11 • **Director:** Gas Operations (5)
- 12 • **Senior Director:** Gas Operations (2)
- 13 • **Vice President:** Gas Operations (1)

14 **Bias Controls:** Data on Hard Brake Rate is provided by a third-party vendor.

15 **Rate Case Safety Goal Progress:** This metric is specifically stated in the 2023  
16 GRC. It is also part of the Safe Driving Rate metric, which also includes Hard  
17 Acceleration. For 2023, this metric is track and trend and does not have a  
18 corresponding target.<sup>95</sup>

19 **Monthly Data:** See Attachment A at the end of this report.

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<sup>95</sup> PG&E 2023 GRC Exhibit (PG&E-7), Chapter 1, Safety and Health, p. 1-24.

1 **Metric 24: Driver’s Call Complaint Rate**

2 **Metric Name and Description:** Driver’s Call Complaint Rate – This metric  
3 measures the total number of Drivers Alert complaint reports received per  
4 1 million miles driven by vehicles included in the Drivers Alert Program. Driver  
5 reports are received from the “How Am I Driving” hotline or generated from  
6 telematics data. Supervisors are required to investigate, take corrective  
7 measures, and submit the investigation report for report notifications within 5  
8 working days. Driver complaint reports feed into the Safe Driver Coaching  
9 Program and are included on the Driver’s Scorecard.

10 **Risk:** Motor Vehicle Safety<sup>96</sup>

11 **Category:** Motor Vehicle

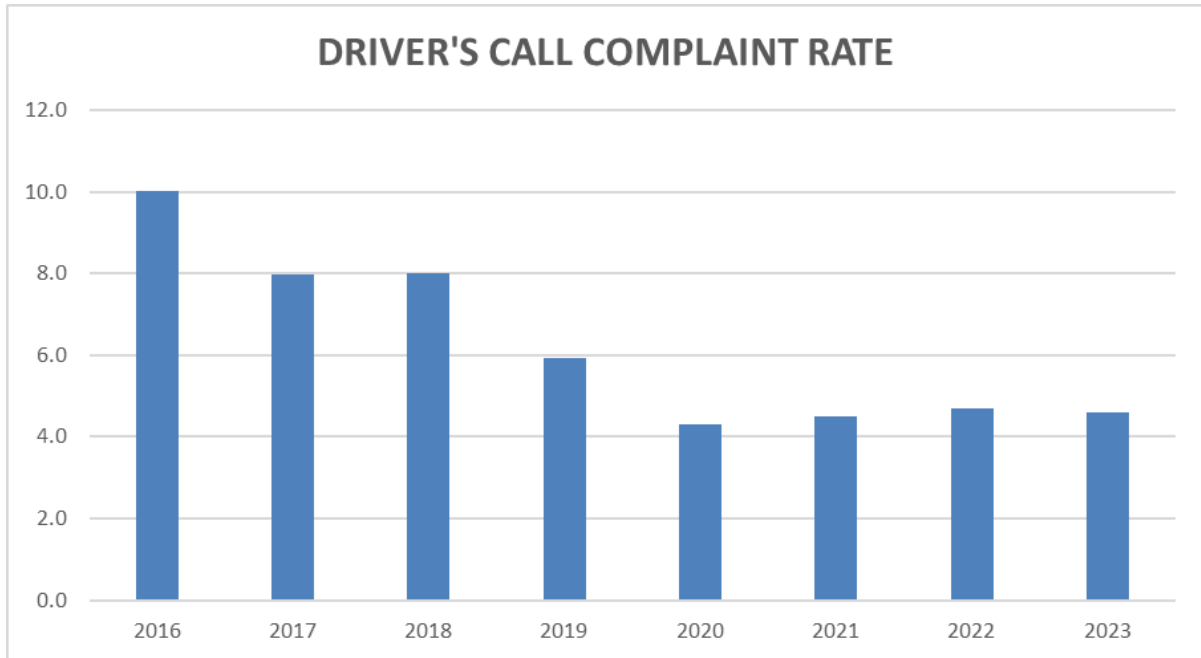
12 **Units:** Total number of Drivers Alert complaint reports received per 1 million  
13 miles driven

14 **Summary:**

---

<sup>96</sup> The Corporate Risk Register now has the following risks: Motor Vehicle Safety Incident.

**FIGURE 5-24  
DRIVER'S CALL COMPLAINT RATE METRIC DATA (ANNUAL)**



1 **Narrative Context:** PG&E began tracking this metric in 2016. The driver  
2 complaint rate has dropped over 50 percent since 2016. There was a slight  
3 uptick in this metric in 2022 due to the introduction of a new report type  
4 regarding speeding events that are generated from our telematics data, but the  
5 rate has normalized and returned to a downward trend in 2023. For every  
6 complaint there is an e-mail to the Supervisor, which requires follow-up and  
7 coaching with the employee.

8 **Is Metric Used for the Purposes of Determining Executive (Director Level  
9 or Higher) Compensation Levels and/or Incentives?**

10 No, in 2023, Driver's Call Complaint Rate, was not used as a STIP metric.

11 **Is Metric Linked to the Determination of Individual or Group Performance  
12 Goals?**

13 No, Driver's Call Complaint Rate is not linked to 2023 individual or group  
14 performance goals for Director-level, or higher,.

1 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

2 No, Driver's Call Complaint Rate is not linked to 2023 individual  
3 performance goals for Director-level, or higher, positions.

4 **Bias Controls:** Data on driver check calls is provided by a third-party vendor.

5 **Rate Case Safety Goal Progress:** This metric was stated in the 2023 GRC as  
6 "Driver's Check Rate" and as track and trend only safety goal.<sup>97</sup> The name has  
7 since been updated to Driver's Call Complaint Rate.

8 **Monthly Data:** See Attachment A at the end of this report.

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<sup>97</sup> PG&E 2023 GRC Exhibit (PG&E-7), Chapter 1, Safety and Health, p. 1-24.

1 **Metric 25: Wires-Down not resulting in Automatic De-energization**

2 **Metric Name and Description:** Wires-Down not resulting in Automatic  
3 De-energization – This metric is defined as the number of occurrences of wire  
4 down events in the past calendar year that did not result in automatic (i.e., not  
5 manually activated) de-energization by circuit protection devices such as fuses,  
6 circuit breakers, and reclosers, etc. on all portions of a downed conductor that  
7 rest on the ground. This metric does not consider possible energization due to  
8 induced voltages from magnetic coupling of parallel circuits. Metric excludes  
9 secondary conductors and service drops. The metric is reported as  
10 a percentage of all wires down events in the past calendar year. Separate  
11 metrics are provided for transmission and distribution systems.

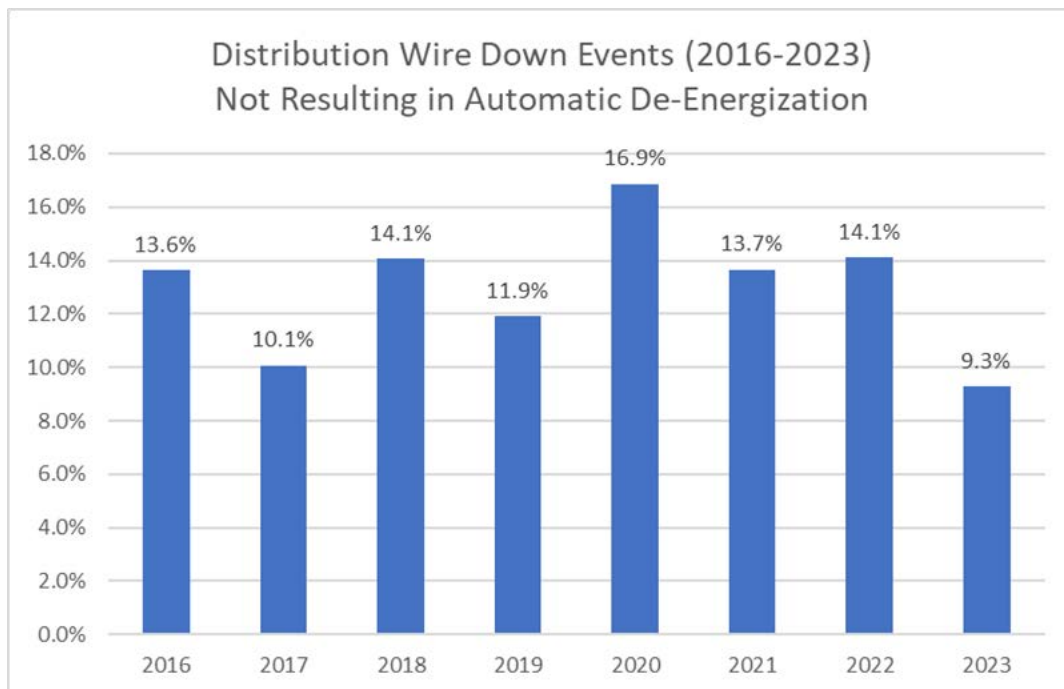
12 **Risks:** Electric Overhead, Wildfire

13 **Category:** Electric

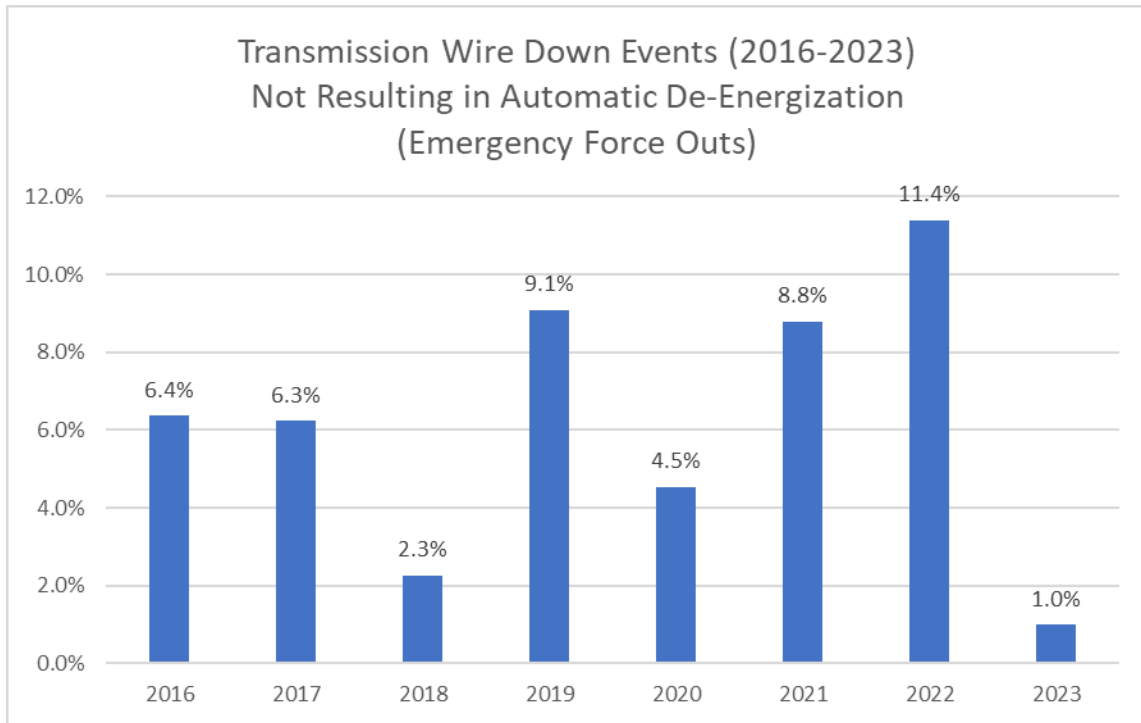
14 **Units:** Percentage of wires down occurrences

15 **Summary:**

**FIGURE 5-25A**  
**DISTRIBUTION WIRES-DOWN NOT RESULTING IN AUTOMATIC DE-ENERGIZATION (ANNUAL)**



**FIGURE 5-25B  
TRANSMISSION WIRES-DOWN NOT RESULTING IN AUTOMATIC DE-ENERGIZATION  
(ANNUAL)**



Note: The data in these figures are subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

1       **Narrative Context:** PG&E updated its outage reporting tools in 2015 to allow  
 2       for reporting when a distribution or transmission wire down event was noted by  
 3       field personnel as being energized upon arrival and as such, 2016 was the first  
 4       full year when this detail was reported in its outage data base. As can be seen  
 5       in Figure 5-25A, the distribution percentage value has ranged from 9.3 percent  
 6       in 2023 to 16.9 percent in 2020 with an eight-year average of 13.0 percent,  
 7       whereas the Transmission percentage value ranged from 1.0 percent in 2023 to  
 8       11.4 percent in 2022 with an eight -year average of 6.2 percent (Figure 5-25-B).  
 9       While PG&E has not tracked this specific metric in the past, for safety reasons,  
 10      field personnel generally treat wire down events as energized if unknown and  
 11      these percentages above represent the information reported as actually being  
 12      energized.

1 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
2 **or Higher) Compensation Levels and/or Incentives?**

3 No, in 2023, Wires-Down not resulting in Automatic De-energization, was  
4 not used as a STIP.

5 **Is Metric Linked to the Determination of Individual or Group Performance**  
6 **Goals?**

7 No, Wires-Down not resulting in Automatic De-energization is not linked to  
8 2023 individual or group performance goals for Director-level, or higher,  
9 positions.

10 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

11 No, Wires-Down not resulting in Automatic De-energization is not linked to  
12 2023 individual performance goals for Director-level, or higher, positions.

13 **Bias Controls:** The wires down events are reported by field and control center  
14 personnel per uniform reporting guidelines as the events occur.

- 15 • Engineers conduct post wire down event reviews (typically for the non-MED  
16 events) and will initiate corrections to the data via the outage quality team to  
17 ensure the reporting guidelines were followed and the records align with  
18 information reported by repair crews.
- 19 • The outage quality team processes all valid change requests received and  
20 also initiates corrections based on their reviews and findings of the collected  
21 outage information.

22 **Rate Case Safety Goal Progress:** This metric is not a 2023 GRC or 2020  
23 RAMP stated safety goal.

24 Significant work was performed to reduce wires down, including replacing  
25 overhead conductor, vegetation clearing, hardening of distribution circuits,  
26 infrared inspections of overhead lines to identify and repair hot spots,  
27 investigating wires down incidents, and implementing learnings/corrective  
28 actions.

29 **Monthly Data:** See Attachment A at the end of this report.

1       **Metric 26: Missed Inspections and Patrols for Electric Circuits**

2       **Metric Name and Description:** Missed Inspections and Patrols for Electric  
3       Circuits – Metrics are calculated as annual number of overhead electric  
4       structures that did not comply with the inspection frequency requirements  
5       divided by total number of overhead electric structures with inspections due in  
6       the past calendar year. Separate metrics are provided for patrols, detailed  
7       inspections. Separate metrics are provided for primary distribution and  
8       transmission overhead circuits. “Minimum patrol frequency” refers to the  
9       frequency of patrols as specified in General Order (GO) 165. “Structures” refers  
10      to electric assets such as transformers, switching protective devices, capacitors,  
11      lines, poles, etc.

12      **Risks:** Electric Overhead, wildfire<sup>98</sup>

13      **Category:** Electric

14      **Units:** percentage of structures that missed inspection relative to total required  
15      structures.

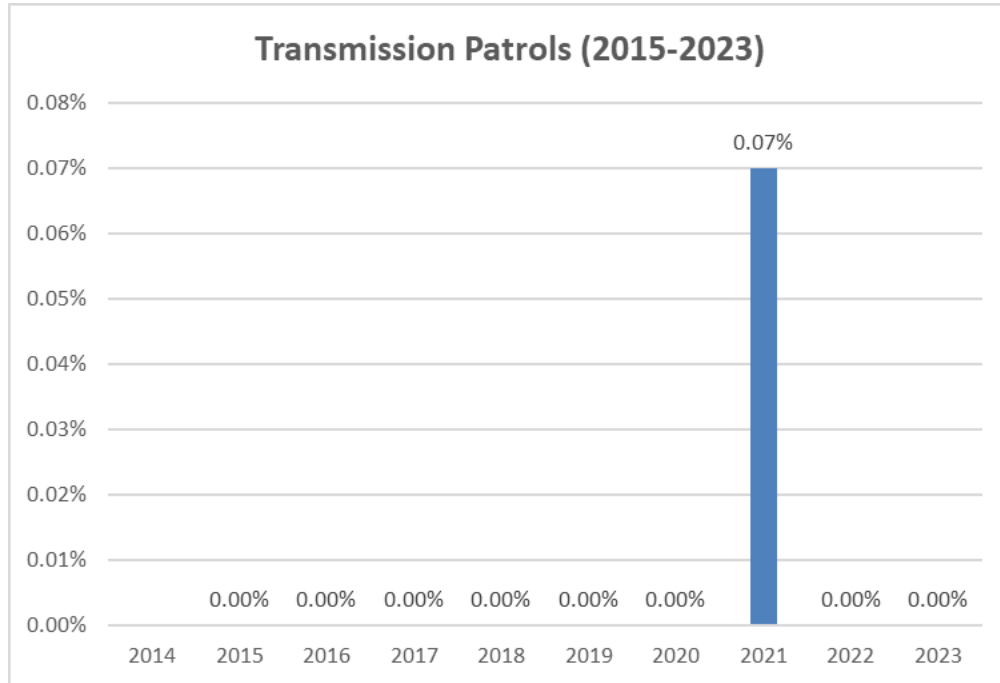
16      **Summary:**

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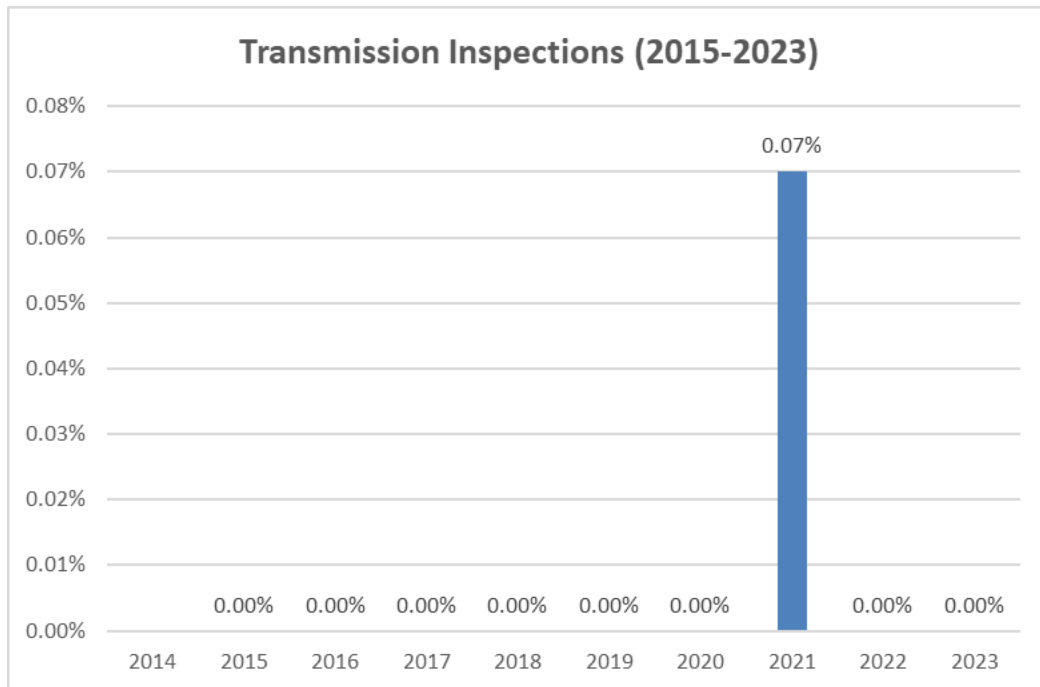
<sup>98</sup> The Corporate Risk Register now has the following risks: (1) Wildfire, (2) Electric Transmission System-Wide Blackout, (3) Failure of Electric Distribution Overhead Assets, (4) Failure of Electric Distribution Underground Assets (5) Failure of Electric Transmission Overhead Assets, (6) Failure of Electric Distribution Substation Assets, (7) Failure of Electric Transmission Underground Assets (8) Failure of Electric Transmission Substation Assets, (9) Failure of Electric Distribution Network Assets, (10) Emergency Preparedness and Response



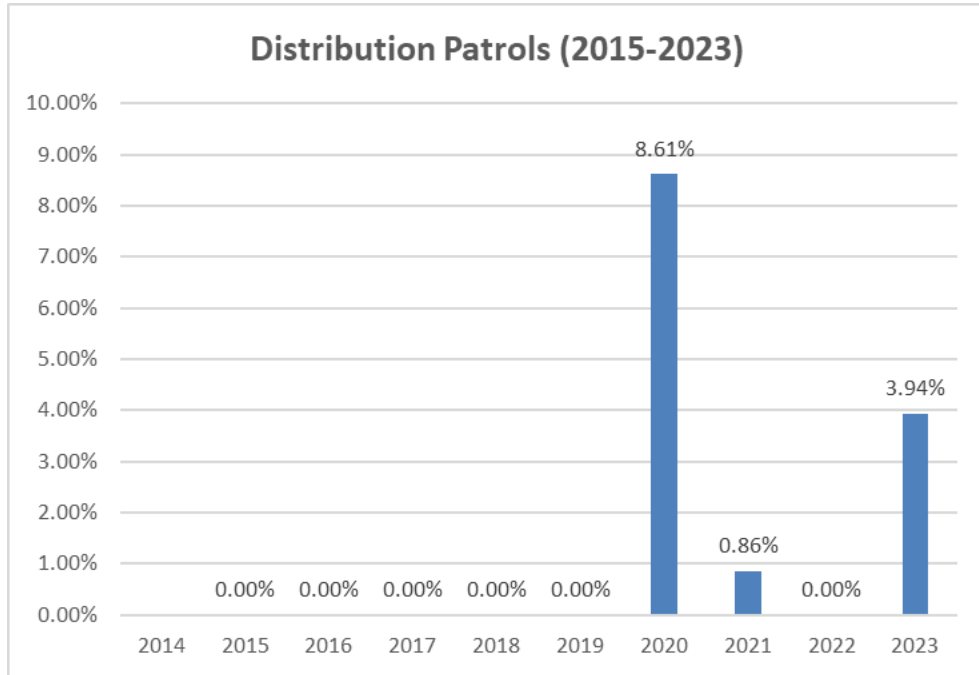
**FIGURE 5-26A  
MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS (ANNUAL)  
(TRANSMISSION PATROLS)**



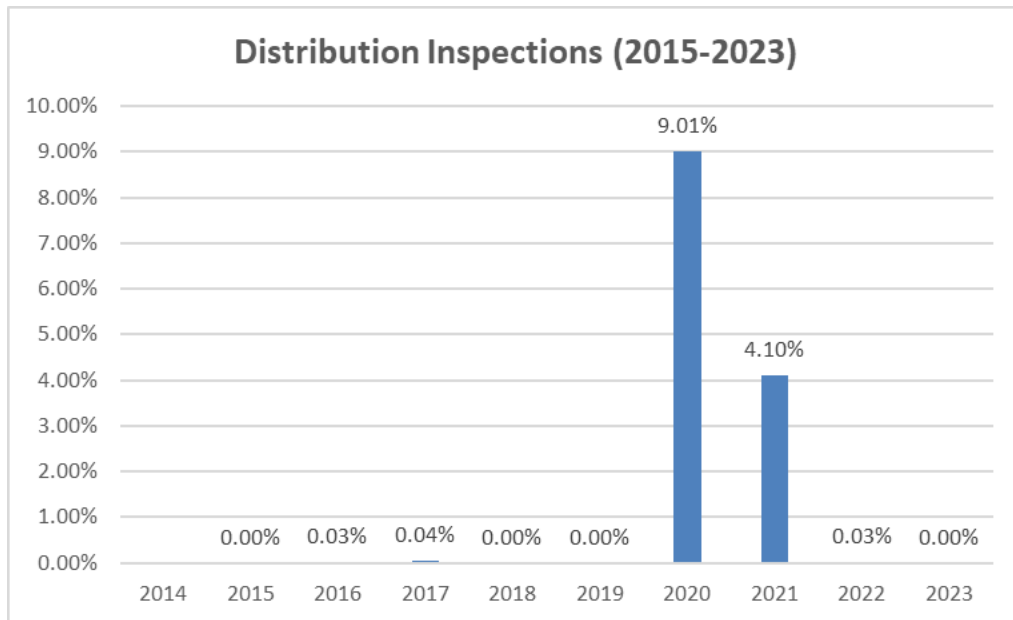
**FIGURE 5-26B  
MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS (ANNUAL)  
(TRANSMISSION INSPECTIONS)**



**FIGURE 5-26C  
MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS (ANNUAL)  
(DISTRIBUTION PATROLS)**



**FIGURE 5-26D  
MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS (ANNUAL)  
(DISTRIBUTION INSPECTIONS)**



1 **Narrative Context:**

2 Distribution Patrols and Inspections

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

5 Starting in 2015 and through 2019, we implemented the new GO 165  
6 requirement to complete patrols and inspections each year within a prescribed  
7 timeframe, based on the date of the last patrol or inspection. Our interpretation  
8 and implementation of this new language calculated the due date for each patrol  
9 or inspection each year as follows:

10 The California Public Utilities Commission (CPUC) twelve plus three (12+3)  
11 month Patrol and Inspection requirement defines:

- 12 • The due date for each “plat map” is based on the date the map was last  
13 inspected or patrolled.
- 14 • Inspections or patrols (of the facilities on a map) may not exceed 3  
15 additional months past the previous inspection or patrol date of that facilities  
16 on that map (maximum 15 months).
- 17 • Inspections or patrols may be performed before the due date.
- 18 • Inspections or patrols are performed by the end of the calendar year (12/31).
- 19 • The start of an inspection or a patrol starts a new inspection or patrol  
20 interval that must be completed within the prescribed timeframe.

21 For the years 2020 and 2021, we pivoted away from the “12+3” due date for  
22 completing patrols and inspections (of the facilities on a map), and instead  
23 directed our inspection program towards accelerating inspections for all  
24 inspectable electric facilities in the High Fire Threat Districts (HFTD) to be  
25 completed in first half of year and Non-HFTD inspections for second half of year.  
26 As a result, we completed patrols and inspections by “static” due dates of 8/31  
27 for HFTD areas, and 12/31 for Non-HFTD areas.

28 In 2023, PG&E completed 555,194 Distribution Patrols out of which 21,853  
29 were completed late leading to 3.94 percent patrols being completed late. PG&E  
30 also completed 230,502 Distribution inspections out of which 10 were completed  
31 late leading to 0 percent inspections being completed late.

## Transmission Patrols and Inspections

Patrols involve simple visual observations to identify obvious nonconformances. 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 remain circuit-based. 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).

The overhead transmission detailed inspection program has undergone significant evolution over the reporting period for the metric. 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 overhead transmission inspections: 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 overhead 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, annually for Tier 3 and on a 3-year cycle for Tier 2, compared to a 5-year cycle for non-HFTD. The 2020 inspections also included non-HFTD structures in PG&E-designated High Fire Risk Areas (HFRA), which were treated like Tier 2. The inspection program in 2021 continued using the HFTD-based cycles introduced in 2020 and imposed an in-year deadline for HFTD and HFRA inspections of 7/31, which PG&E committed to in the 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

1 June 2021 to ensure that all assets requiring an inspection under their  
2 prescribed cycles were included in the plan, including assets that were newly  
3 added to the asset registry. The 2022 inspection scope introduced the use of  
4 wildfire risk and consequence scores at the structure level to inform the selection  
5 of assets to be inspected.

6 Data provided for 2015-2019 reflects systemwide performance.  
7 HFTD-specific performance is not available prior to 2020. The HFTD data for  
8 patrols and inspections was tracked in SAP starting in 2020.

9 In 2023, PG&E completed 44,981 Transmission Patrols out of which  
10 0 structures fell below the minimum inspection frequency requirements leading  
11 to 0 percent patrols being completed late. PG&E also completed 54,717  
12 Transmission inspections out of which 0 structures fell below the minimum  
13 inspection frequency requirements leading to 0 percent inspections being  
14 completed late.

15 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
16 **or Higher) Compensation Levels and/or Incentives?**

17 No, in 2023, Missed Inspections and Patrols for Electric Circuits, was not  
18 used as a STIP metric.

19 **Is Metric Linked to the Determination of Individual or Group Performance**  
20 **Goals?**

21 No, Missed Inspections and Patrols for Electric Circuits, is not linked to 2023  
22 individual or group performance goals for Director-level, or higher, positions.

23 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

24 No, Missed Inspections and Patrols for Electric Circuits is not linked to 2023  
25 individual performance goals for Director-level, or higher, positions.

26 **Bias Controls:** Tracking spreadsheet at the division level for each of the  
27 18 distribution compliance offices, with all maintenance plans that are due for  
28 the year – including the following:

- 29
- Patrols: Date of last patrol, with calculated CPUC due date;
  - Inspections: Date of last inspection, with calculated CPUC due date;
- 30

- 1 • As work is completed, entries are made into the spreadsheet including the  
2 date that the work was started and completed, Inspector Name and LAN ID,  
3 etc.; and
- 4 • Tracking column indicating if the work was completed <= the CPUC due  
5 date.

6 Division spreadsheets are merged into a master file every week, with the  
7 following tracking mechanisms:

- 8 • “At Risk” report, which provides the work that is coming due in the next  
9 2 weeks & 6 weeks, for visibility;
- 10 • Summary report, by Division, showing volume of facilities that were  
11 completed on time or late;
- 12 • Recurring calls with Area Managers and Supervisor, to review the “At Risk”  
13 report to ensure visibility of upcoming due dates, understanding of any late  
14 units; and
- 15 • For late units, centralized tracking of all late units within the System  
16 Inspections “data response” team, including reason for work being complete  
17 late, remediation efforts needed, etc.

18 Supervisors have visibility in to CPUC due dates, are required to dispatch  
19 work to Inspectors in time to meet dates. Inspectors see CPUC due dates on  
20 paper map package and in the Inspect application, so that they can prioritize and  
21 ensure they complete the work by the due date. Due date requirements are  
22 covered during Inspector training courses. Contract resources have visibility into  
23 due dates, expectation is that they complete all assigned work by due dates.

24 “Engage” application – scheduling tool for Supervisor to assign OH  
25 inspections, includes the due date for each maintenance plan, so that  
26 supervisors have visibility and can ensure they are dispatching work in time to  
27 meet the CPUC due date. Daily “Attainment Report” for OH inspections  
28 completed in the Inspect application, which includes “asset required date”  
29 (CPUC due date and/or WMP date, whichever date is sooner) and completion  
30 date.

31 Various monthly reporting and metrics showing volume of patrols and  
32 inspections completed on time or late.

33 IA performed a validation of the 2023 metric performance.

1       **Rate Case Safety Goal Progress:** The Missed Inspections and Patrols metric is  
2 related to PG&E’s commitment to perform its Detailed Electric Distribution and  
3 Transmission Inspections in Compliance with its WMP, but also with GO 165.  
4 Significant work was performed to ensure electric facilities were inspected within  
5 their respective compliance timelines, but to ensure the inspections were  
6 effective in identifying non-conformances that required urgent repairs to  
7 mitigation for the potential of catastrophic wildfires. Furthermore, additional  
8 planning controls were developed to ensure all inspectable facilities are in a  
9 planned inspection cycle to avoid inspections being missed. See the 2023 GRC  
10 (A.21.06.021) Exhibit 4 Chapter 10 for a complete description of PG&E’s  
11 inspection programs and improvements for years 2023-2026.

12       **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 27: Overhead Conductor Size in High Fire Threat District, Tiers 2**  
2 **and 3, (HFTD)**

3 **Metric Name and Description:** Overhead Conductor Size in High Fire Threat  
4 District, Tiers 2 and 3, HFTD – percentage of primary distribution overhead  
5 conductors in Tiers 2 and 3 HFTD that is #6 copper (6Cu). Secondary  
6 conductors are excluded.

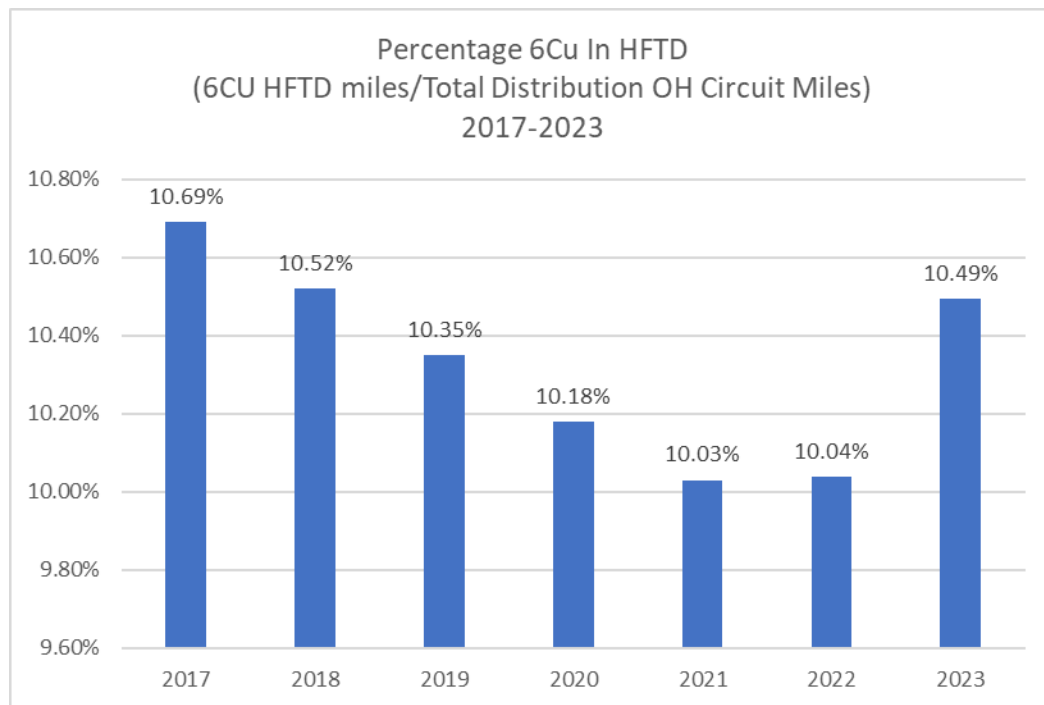
7 **Risks:** Electric Overhead, Wildfire

8 **Category:** Electric

9 **Units:** Percentage relative to total circuit miles

10 **Summary:**

**FIGURE 5-27**  
**OVERHEAD CONDUCTOR SIZE IN HIGH FIRE THREAT DISTRICT, TIERS 2 AND 3, (HFTD)**  
**(ANNUAL)**



11 **Narrative Context:** Pacific Gas and Electric Company’s (PG&E) system of  
12 record for our electric distribution facilities is Electric Distribution Geographic  
13 Information System (EDGIS). The EDGIS data points above show a reduction  
14 of 6Cu over time within PG&E’s distribution system. PG&E has eliminated the  
15 use of 6Cu in new construction, however it is still used in cases of maintenance  
16 and emergency work.



1 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
2 **or Higher) Compensation Levels and/or Incentives?**

3 No, in 2023, Overhead Conductor Size in High Fire Threat District, Tiers 2  
4 and 3, (HFTD) was not used as a STIP metric.

5 **Is Metric Linked to the Determination of Individual or Group Performance**  
6 **Goals?**

7 No, Overhead Conductor Size in High Fire Threat District, Tiers 2 and 3,  
8 (HFTD) is not linked to 2023 individual or group performance goals for  
9 Director-level, or higher, positions.

10 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

11 No, Overhead Conductor Size in High Fire Threat District, Tiers 2 and 3,  
12 (HFTD) is not linked to 2023 individual performance goals for Director-level, or  
13 higher, positions.

14 **Bias Controls:** There are currently no bias controls in place for measuring the  
15 amount of 6Cu in our system. There are a total of approximately 25,060  
16 Distribution overhead circuit miles located in the Tier 2 and Tier 3 HFTD areas.  
17 PG&E's data bases reflect the circuit miles that currently exist and do not  
18 maintain the historical values specifically in the Tier 2/3 areas. As such, PG&E  
19 has assumed these values have remained the same for all years from 2013  
20 through 2022 and assuming annual variances due to the circuit miles are very  
21 small. Beginning with 2023 performance, PG&E will report the nominally  
22 updated circuit mileage total annually.

23 **Rate Case Safety Goal Progress:** PG&E does not focus on this metric;  
24 therefore, it is not used to track safety performance. There is no safety goal  
25 associated with the amount of 6Cu in the 2023 GRC.

26 **Monthly Data:** See Attachment A at the end of this report. EDGIS system  
27 capabilities only have annual data snapshots as far back as 2017 and we  
28 currently do not have the ability to display the results in a monthly manner.

1       **Metric 28: Gas Operation Corrective Actions Backlog**

2       **Metric Name and Description:** Gas Operation (GO) Corrective Actions  
3       Backlog – Total number of overdue work orders generated to correct 49 Code of  
4       Federal Regulations (CFR) Part 192 non-compliances or infractions Notices of  
5       Violation that exceeded the maximum allowable/allotted time frame to complete  
6       the work order in the past calendar year divided by the total number of closed or  
7       still-open non-compliance or infraction Notices of Violation-related work orders in  
8       past calendar year, evaluated at the end of the year. Maximum  
9       allowable/allotted time is based on either applicable requirement in 49 CFR  
10      Part 192, or the utility’s internal standards. Separate metrics are provided for  
11     gas distribution (GD) and gas transmission (GT).

12     **Risks:** Loss of Containment (LoC) on Gas Transmission Pipeline; LoC on Gas  
13     Distribution Main or Service<sup>99</sup>

14     **Category:** Gas

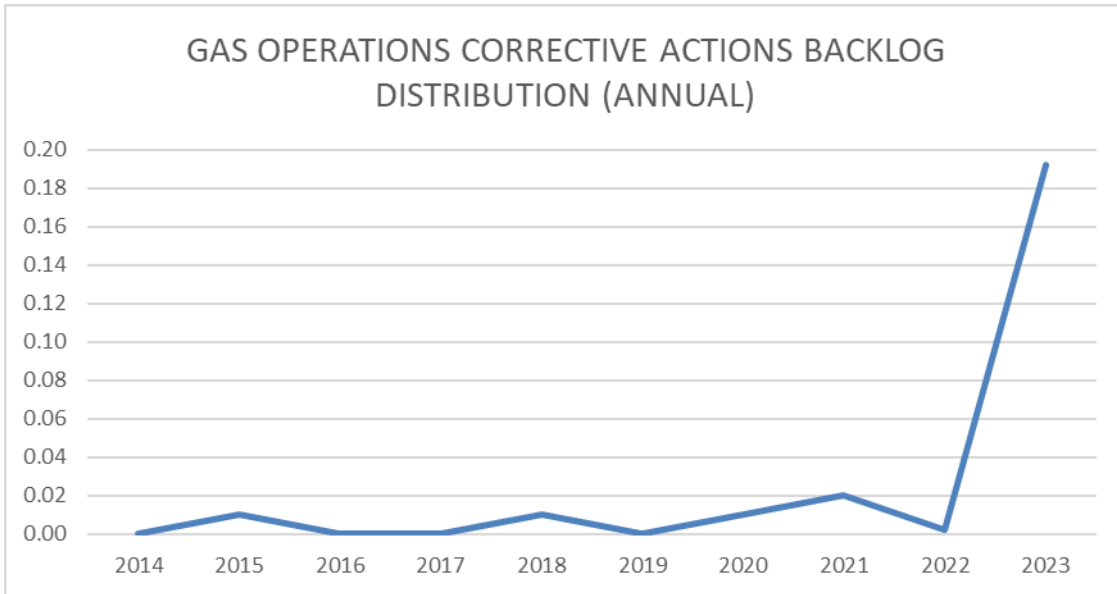
15     **Units:** Percentage of work orders past due for completion in the past calendar  
16     year

17     **Summary:**

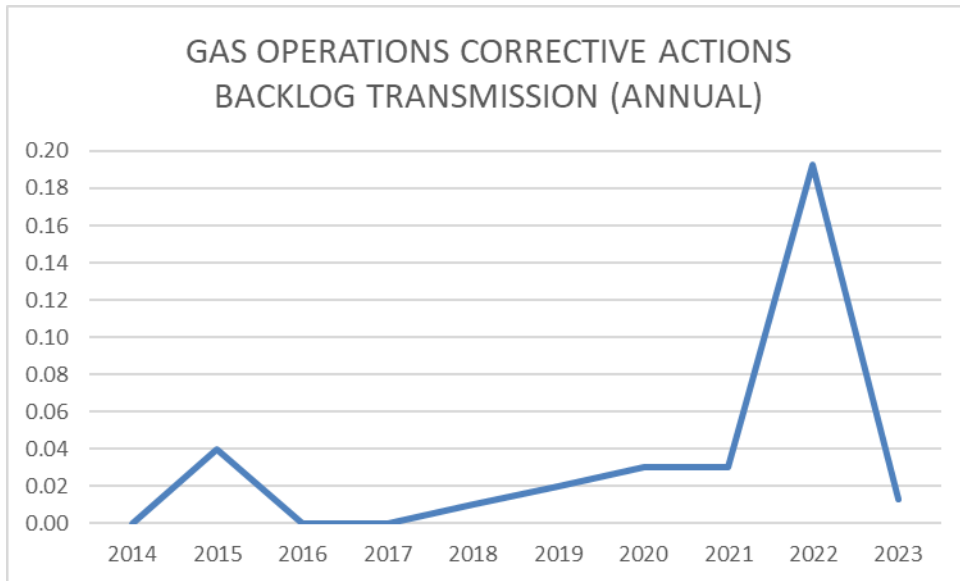
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<sup>99</sup> The Corporate Risk Register now has the following risks: LoC on Gas Transmission Pipeline; LoC on Gas Distribution Main or Service.

**FIGURE 5-28A**  
**GAS OPERATIONS CORRECTIVE ACTIONS BACKLOG DISTRIBUTION (ANNUAL)**



**FIGURE 5-28B**  
**GAS OPERATIONS CORRECTIVE ACTIONS BACKLOG TRANSMISSION (ANNUAL)**



1 **Narrative Context:**

2 These metrics measure overdue corrective work orders (leveraging timeframes  
3 outlined in 49 CFR Part 192) as a percentage of total corrective workorders in a  
4 given calendar year. PG&E includes actions resulting from low cathodic  
5 protection reads and atmospheric corrosion remediation of bad coating or wrap  
6 at the air to soil interface in the calculation of this metric.

7 In 2023, Gas Distribution Corrective Action Backlog is 0.19. From  
8 2013-2022, there has been an 80 percent decrease in GO Corrective Backlog  
9 for Gas Distribution because of a self-report with 2,509 instances where there  
10 was delay on remediating atmospheric corrosion on meter sets and risers due to  
11 "Can't Get In" situations. In 2023, Gas Transmission Corrective Action Backlog  
12 was 0.01 which is a significant decrease compared to the data for the past  
13 4 years.

14 **Is Metric Used for the Purposes of Determining Executive (Director Level  
15 or Higher) Compensation Levels and/or Incentives?**

16 No, in 2023, GO Corrective Actions Backlog was not used as a STIP metric.

17 **Is Metric Linked to the Determination of Individual or Group Performance  
18 Goals?**

19 Yes, GO Corrective Actions Backlog is linked to 2023 individual or group  
20 performance goals for one or more Director-level, or higher, position.

21 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

22 Yes, in 2023, the following position(s) include individual performance goals  
23 that are linked to GO Corrective Actions Backlog.

- 24 • **Director:** Gas Engineering (7), Gas Operations (1)
- 25 • **Senior Director:** Gas Operations (1)

26 **Bias Controls:** Work orders are generated in our system of record and  
27 assigned due dates per guidance in 49 CFR Part 192. Overdue items are  
28 tracked by our compliance team and issued via a "self-report" to the CPUC. The  
29 data is tracked through monthly attainment reporting for different asset types.

30 **Rate Case Safety Goal Progress:** This safety metric is not related to a safety  
31 goal described in the 2023 General Rate Case.

1 **Monthly Data:** See Attachment A at the end of this report.

1 **Metric 29: GO-95 Corrective Actions (Tiers 2 and 3, HFTD)**

2 **Metric Name and Description:** General Order (GO)-95 Corrective Actions  
3 (Tiers 2 and 3, High Fire Threat District (HFTD)) – The number of Priority Level  
4 2 notifications that were completed on time divided by the total number of  
5 Priority Level 2 notifications that were due in the calendar year in Tiers 2 and 3,  
6 HFTD. Consistent with GO 95 Rule 18 provisions, the proposed metric should  
7 exclude notifications that qualify for extensions under reasonable circumstances.  
8 Separate metrics are provided for distribution and transmission systems.

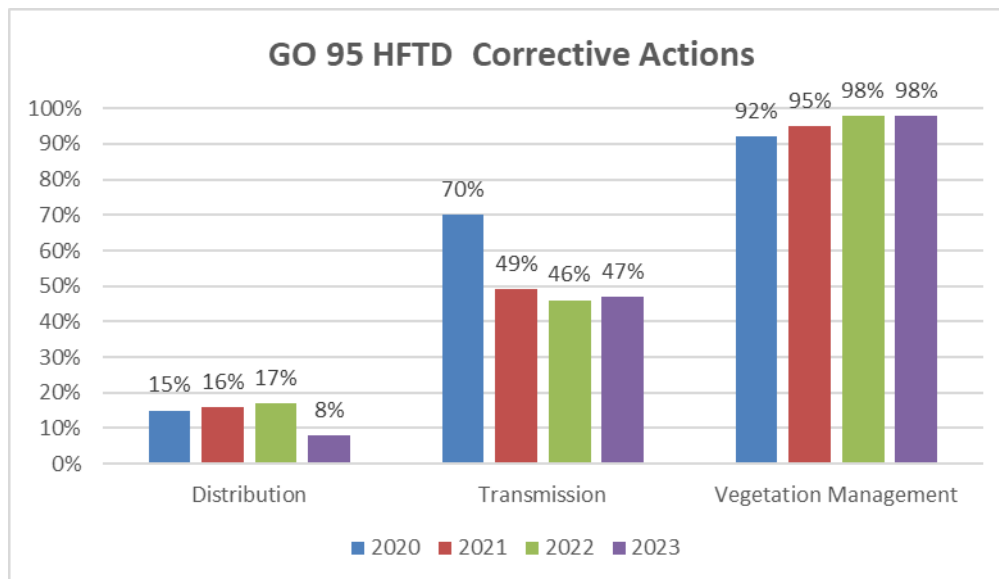
9 **Risks:** Electric safety and wildfire<sup>100</sup>

10 **Category:** Electric

11 **Units:** Percentage of corrective actions completed on time

12 **Summary:**

**FIGURE 5-29**  
**GO-95 CORRECTIVE ACTIONS (TIERS 2 AND 3, HFTD) (ANNUAL)**



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<sup>100</sup> The Corporate Risk Register now has the following risks: (1) Wildfire, (2) Electric Transmission System-Wide Blackout, (3) Failure of Electric Distribution Overhead Assets, (4) Failure of Electric Distribution Underground Assets (5) Failure of Electric Transmission Overhead Assets, (6) Failure of Electric Distribution Substation Assets, (7) Failure of Electric Transmission Underground Assets (8) Failure of Electric Transmission Substation Assets, (9) Failure of Electric Distribution Network Assets, (10) Emergency Preparedness and Response.

1 **Narrative Context:** The GO 95 Corrective Actions in HFTD metric measures  
2 the number of Priority Level 2 corrective notifications (tags) in HFTD that are  
3 completed in accordance with the GO 95 Rule 18 timelines.

4 This metric is associated with our Failure of Electric Distribution Overhead  
5 Asset Risk and Wildfire Risk, which are part of our 2020 Risk Assessment and  
6 Mitigation Phase Report filing.

7 The metric performance comprises an aggregated performance in electric  
8 distribution, transmission, and vegetation management. Metric performance is  
9 further discussed in the Safety & Operational Metric Report, Chapter 3-11.

10 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
11 **or Higher) Compensation Levels and/or Incentives?**

12 No, in 2023, GO-95 Corrective Actions (Tiers 2 and 3, HFTD) was not used  
13 as a STIP metric.

14 **Is Metric Linked to the Determination of Individual or Group Performance**  
15 **Goals?**

16 Yes, GO-95 Corrective Actions (Tiers 2 and 3, HFTD) is linked to 2023  
17 individual or group performance goals for one or more Director-level, or higher,  
18 position.

19 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

20 Yes, in 2023, the following position(s) include individual performance goals  
21 that are linked to GO-95 Corrective Actions (Tiers 2 and 3, HFTD):

- 22 • **Director:** Customer and Communications (1), Electrical Engineering (1)  
23 Electric Operations (8)
- 24 • **Senior Director:** Electric Engineering (2), Electric Operations (5);  
25 Operations (1)
- 26 • **Senior Vice President:** Electric Engineering (1)

27 **Bias Controls:**

- 28 • **Transmission:** Once a notification is released to Line Corrective  
29 notifications, the Centralized Inspection Review Team (CIRT) is the only  
30 group that can edit the priority, fire tier, and scope of work (via Facility  
31 Damage Action (FDA)/ Work Type Code (WTC)), due date, and other fields.  
32 Changes are controlled by adding the user status code PRTO status, which

1 severely limits the editable fields to anyone outside of CIRT. CIRT adds this  
2 status to all notifications that are reviewed.

- 3 • **Distribution:** Once a notification is entered into SAP, it is released for  
4 review in the gatekeeper screen, which has SAP controls built into it based  
5 on the FDA table that has the various FDAs (facility/damage/action), WTC  
6 (work type codes), tag priority, duration/due date, etc. The tags info  
7 (pictures, map, comments) are reviewed by the gatekeepers in CIRT and  
8 confirmed as EC. Once a tag is converted to an EC, edit functions to certain  
9 fields are limited to the compliance group.
- 10 • Internal Audit performed a validation of the 2023 metric performance.

11 **Rate Case Safety Goal Progress:** This metric is not a 2023 General Rate  
12 Case (GRC) stated safety goal but in the 2023 GRC the California Public Utilities  
13 Commission (Commission) established a new two-way balancing account to  
14 track work associated with overhead and Underground Electric Distribution  
15 Maintenance associated with tags resulting from inspections and other reporting.  
16 The Commission states in the 2023 GRC Decision (D.23-11-069) that:

17 *A balancing account will protect ratepayers from paying the cost of*  
18 *untracked deferred work and allow PG&E the flexibility to perform the work it*  
19 *can cost-effectively perform. In this balancing account, PG&E shall*  
20 *separately account for any additional costs associated with difficult to*  
21 *access or remote areas.<sup>101</sup>*

22 PG&E continues to focus its GO 95 Corrective Actions in HFTDs with a  
23 risk-informed prioritization of its work plans. PG&E's strategy focuses on  
24 reducing wildfire risk associated with open corrective notifications while  
25 deploying safety controls to manage the lower risk Level 2 Priority "E" corrective  
26 notifications. This approach allows strategic and targeted wildfire risk reductions  
27 to remain our primary focus.

28 See 2023 GRC (A.21.06.021) Exhibit 4 Chapter 11 for a detailed description  
29 of PG&E's Electric Distribution Overhead and Underground Maintenance  
30 program for PG&E's approach to GO-95 Corrective Actions.

31 **Monthly Data:** See Attachment A at the end of this report.

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<sup>101</sup> See D.23-11-069 page 353 and Ordering Paragraph 117.



1 **Metric 30: Gas Overpressure Events**

2 **Metric Name and Description:** Gas Overpressure Events - CPUC-reportable  
3 overpressure events are those that met the conditions specified in  
4 General Order 112-F, 122.2(d)(5) but are reported on the same frequency as the  
5 other Safety Performance Metrics. Separate metrics are provided for distribution  
6 and transmission systems. This metric measures both gas operational  
7 performance and the integrity of gas pipelines.

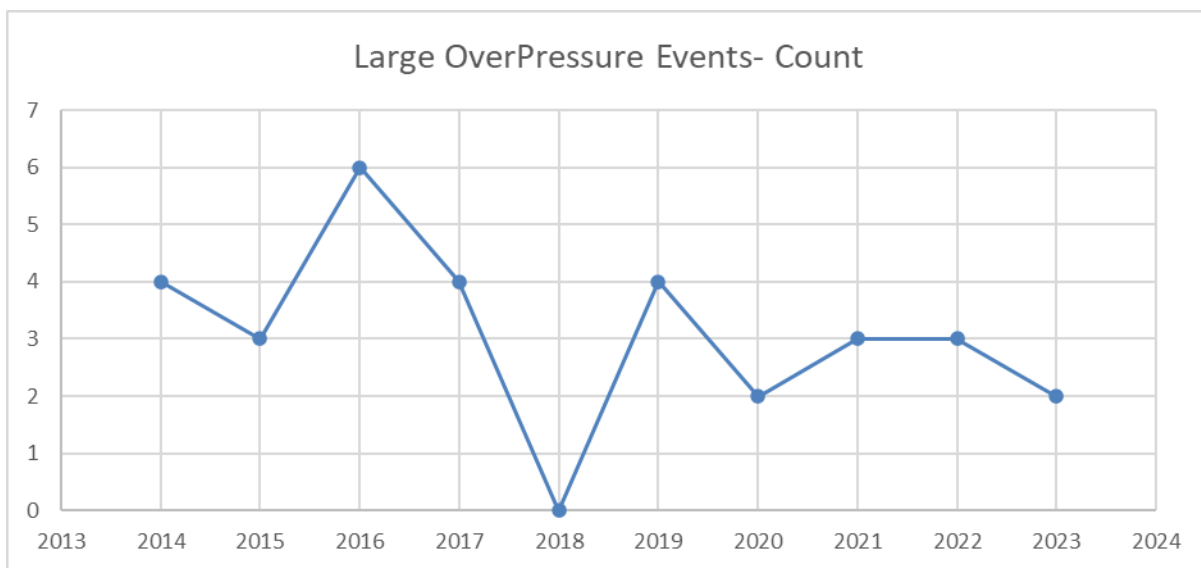
8 **Risks:** Large Overpressure Event Downstream of Gas Measurement and  
9 Control Facility; Loss of Containment (LoC) at Gas Measurement and Control or  
10 Compression and Processing Facility<sup>102</sup>

11 **Category:** Gas

12 **Units:** Number of occurrences

13 **Summary:**

**FIGURE 5-30  
GAS OVERPRESSURE EVENTS (ANNUAL)**



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<sup>102</sup> The Corporate Risk Register now has the following risks: Large Overpressure Event Downstream of Gas Measurement and Control Facility; LoC at Gas Measurement and Control or Compression and Processing Facility.

1 **Narrative Context:** A large Overpressure event is defined as any verified  
2 pressure reading that exceeds the design limits set forth in the Code of Federal  
3 Regulations (CFR) – 49 CFR 192.201. This metric tracks the occurrence of  
4 Overpressure events, which includes:

- 5 1. High pressure Gas Distribution
  - 6 a. (Maximum Allowable Operating Pressure (MAOP) 1 pound per square  
7 inch gauge (psig) to 12 psig) greater than 50 percent above MAOP
  - 8 b. (MAOP 12 psig to 60 psig) greater than 6 psig
- 9 2. Gas Transmission pipelines greater than 10 percent above MAOP (or the  
10 pressure produces a hoop stress of  $\geq 75$  percent Specified Minimum Yield  
11 Strength, whichever is lower)

12 Overpressure events on low pressure systems are excluded from this metric  
13 because they are not defined in federal code 49 CFR 192.201. In the past  
14 10 years, the number of Overpressure events range between 5 to 11 with  
15 5 occurrences in 2023. PG&E continues to review operations and look for  
16 opportunities to perform work to further reduce OP events and contribute to  
17 system safety.

18 PG&E has identified human performance and equipment failure as the two  
19 most common causes for Overpressure events. Actions to eliminate  
20 Overpressure events were implemented, including station design and  
21 construction best practices; lock-out/tag-out process improvements; and  
22 distribution of information around associated Overpressure risk factors through  
23 training and communication initiatives. PG&E has been installing Supervisory  
24 Control and Data Acquisition (SCADA) points in the past years to increase  
25 system real-time visibility in the Gas Control Center which could provide better  
26 detection capabilities and allow more Overpressure events to be identified and  
27 recorded. PG&E also began installing sulfur filters on pilot-operated equipment  
28 in 2018. Large Volume Customer primary regulation sets also received  
29 accelerated inspections in 2018.

30 PG&E continues to review operations and look for opportunities to perform  
31 work to further limit potential MAOP exceedances. Each activity builds on the  
32 goal to eliminate large Overpressure events, thereby contributing to system  
33 safety and reliability.

1 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
2 **or Higher) Compensation Levels and/or Incentives?**

3 No, in 2023, Gas Overpressure Events was not used as a STIP metric.

4 **Is Metric Linked to the Determination of Individual or Group Performance**  
5 **Goals?**

6 Yes, Gas Overpressure Events is linked to 2023 individual or group  
7 performance goals for two Director-level positions.

8 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

9 Yes, in 2023, the following position(s) include individual performance goals  
10 that are linked to Gas Overpressure Events.

- 11 • **Director:** Gas Engineering (1)
- 12 • Senior Director: Gas Operations (1)
- 13 • Senior Vice President: Gas Operations (1)

14 **Bias Controls:** PG&E has both an automated process and field process for  
15 logging Gas Overpressure events. For the automated process, SCADA system  
16 monitors equipment pressure and notifies potential issues to Gas Control  
17 through alarms. For the field process, field personnel are required to gauge  
18 pressure during maintenance and clearances, and report to Gas Control if an  
19 abnormal operating condition arises.

20 IA performed a validation of the 2023 metric performance.

- 21 1. Each Overpressure event is entered into our SAP Corrective Action Program  
22 (CAP) system of record to ensure retention of record history.
- 23 2. Each Overpressure event's datasets (location, CAP number, date, cause,  
24 corrective action, etc.) are reviewed by the Facility Integrity Management  
25 Program team to ensure accuracy and are logged in the Overpressure  
26 master list which is viewable by all PG&E employees.
- 27 3. Each Overpressure event is distributed to stakeholders by an electronic page  
28 (epage) and an email (Quick Hit), which is reviewed in the next Daily  
29 Operations Briefing with leadership.

1       **Rate Case Safety Goal Progress:** This metric supports a safety goal described  
2       in the 2023 General Rate Case (GRC) to utilize PG&E’s Overpressure  
3       Protection Enhancements Program to mitigate large overpressure events due to  
4       equipment-related failure at regulator stations.<sup>103</sup> However, it should be noted  
5       the 2023 GRC decision did not approve continued funding of this program for  
6       the 2023-2026 rate case period.<sup>104</sup>

7       **Monthly Data:** See Attachment A at the end of this report.

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<sup>103</sup> See 2023 GRC Exhibit (PG&E-3), pp. 6-60, line 4 to 6-60, line 2.

<sup>104</sup> See D.23-11-069, p. 139.

1 **Metric 31: Gas In-Line Inspections Missed**

2 **Metric Name and Description:** Gas In-Line Inspections Missed - The number  
3 of gas pipeline in-line inspections that missed the required reassessment  
4 interval, according to the relevant intervals established pursuant to 49 CFR,  
5 Part 192.

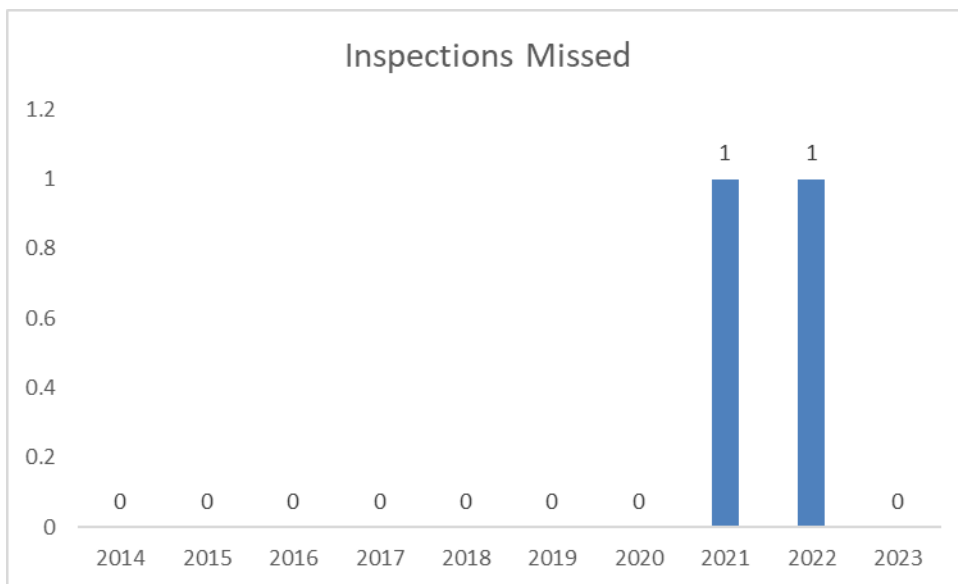
6 **Risks:** Loss of Containment (LoC) on Gas Transmission Pipeline<sup>105</sup>

7 **Category:** Gas

8 **Units:** Number of Missed Inspections

9 **Summary:**

**TABLE 5-31  
GAS IN-LINE INSPECTIONS MISSED**



10 **Narrative Context:** From 2014–2020, there were no instances of gas pipeline  
11 in-line inspections that missed the required reassessment interval, according to  
12 the relevant intervals established pursuant to 49 CFR, Part 192. However, in  
13 2021 and in 2022, PG&E recorded 1 instance of gas pipeline in-line inspection  
14 that missed the required reassessment interval. These missed inspections were  
15 due to potential customer reliability impacts and safety concerns related to

---

<sup>105</sup> The Corporate Risk Register now has the following risks: LoC on Gas Transmission Pipeline

1 fatigue of the construction and operations personnel. In 2023, there were no  
2 instances of missed gas pipelines inspections.

3 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
4 **or Higher) Compensation Levels and/or Incentives?**

5 No, in 2023, Gas In-Line Inspections Missed was not used as a STIP metric.

6 **Is Metric Linked to the Determination of Individual or Group Performance**  
7 **Goals?**

8 No, Gas In-Line Inspections Missed is not linked to 2023 individual or group  
9 performance goals for Director-level, or higher, positions.

10 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

11 No, Gas In-Line Inspections Missed metric is not linked to 2023 individual  
12 performance goals for Director-level, or higher, positions.

13 **Bias Controls:** Missed gas in-line inspections identified through the corrective  
14 action program are reviewed as a non-conformance by the Gas Regulatory  
15 Compliance Department. Non-conformance results are then reported to the  
16 California Public Utilities Commission, as required.

17 **Rate Case Safety Goal Progress:** Non-compliance for missed ILI inspections  
18 is tied to a safety goal in the 2023 General Rate Case as it is a mandatory  
19 federal safety requirement PG&E is committed to meeting.

20 **Monthly Data:** See Attachment A at the end of this report.

1       **Metric 32: Overhead Conductor Safety Index**

2       **Metric Name and Description:** Overhead Conductor Safety Index – Overhead  
3       Conductor Safety Index is the sum of all annual occurrences on overhead  
4       transmission or primary voltage distribution conductors satisfying one or more of  
5       the following conditions divided by total circuit miles in the system x 1,000:

- 6       1) A conductor or splice becomes physically broken;
- 7       2) A conductor is dislodged from its intended design position due to either  
8       malfunction of its attachment points and/or supporting structures or contact  
9       with foreign objects (including vegetation);
- 10      3) A conductor falls from its intended position to rest on the ground or a foreign  
11      object;
- 12      4) A conductor comes into contact with communication circuits, guy wires, or  
13      conductors of a lower voltage; or
- 14      5) A power pole carrying normally energized conductors leans by more than  
15      45 degrees in any direction relative to the vertical reference when measured  
16      at ground level.

17      Separate metrics are reported for transmission and primary voltage distribution  
18      conductors. Secondary voltage conductors and service drops are not included  
19      in this metric.

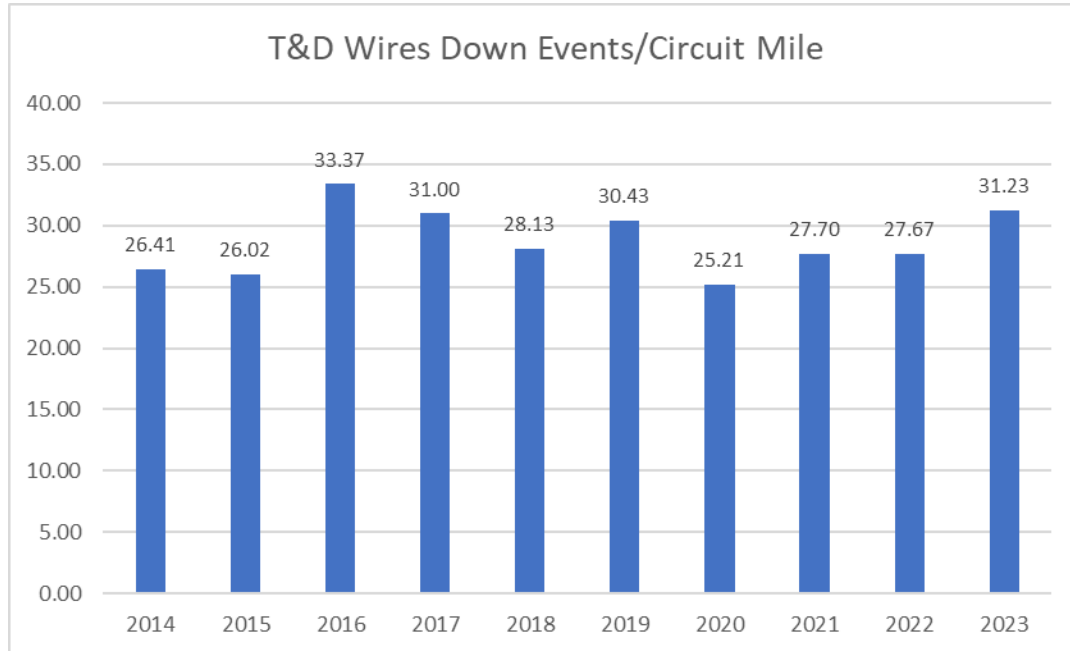
20      **Risks:** Wildfire, Transmission Overhead Conductor, Distribution Overhead  
21      Conductor Primary

22      **Category:** Electric

23      **Units:** Number of occurrences per 1,000 circuit miles

1 **Summary:**

**FIGURE 5-32<sup>106</sup>**  
**OVERHEAD CONDUCTOR SAFETY INDEX (ANNUAL)**



Note: The data in this figure is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

2 **Narrative Context:** PG&E does not currently have the ability to report out on  
3 this metric per the five subcomponents listed above, as we do not track  
4 conductor failures at that level of granularity. PG&E, along with the other CA  
5 IOUs, will report the Overhead Conductor Safety Index metric as a rate of our  
6 T&D wires down SPM metric 1 (excluding MEDs and secondary wires). The  
7 rate is calculated as the number of T&D wires down divided by total circuit miles  
8 times 1,000. PG&E's rate for 2023 was 31.23.

<sup>106</sup> Figure 5-32 performance has been corrected to align with the metric definition to multiply the number of miles in the denominator by 1,000. This impacts all years and previously submitted 2021 and 2022 reports.



1 **Is Metric Used for the Purposes of Determining Executive (Director Level**  
2 **or Higher) Compensation Levels and/or Incentives?**

3 No, in 2023, Overhead Conductor Safety Index was not used as a STIP  
4 metric.

5 **Is Metric Linked to the Determination of Individual or Group Performance**  
6 **Goals?**

7 No, Overhead Conductor Safety Index is not linked to 2023 individual or  
8 group performance goals for Director-level, or higher, positions.

9 **Is Metric Linked to Executive (Director Level or Higher) Positions?**

10 No, Overhead Conductor Safety Index is not linked to 2023 individual  
11 performance goals for Director-level, or higher, positions.

12 **Bias Controls:** The wires down events are reported by field and control center  
13 personnel per uniform reporting guidelines as the events occur.

- 14 • Engineers conduct post wire down event reviews (typically for the non-MED  
15 events) and will initiate corrections to the data via the outage quality team to  
16 ensure the reporting guidelines were followed and the records align with  
17 information reported by repair crews.
- 18 • The outage quality team processes all valid change requests received and  
19 also initiates corrections based on their reviews and findings of the collected  
20 outage information.

21 **Rate Case Safety Goal Progress:** This metric is not a 2023 General Rate  
22 Case or 2020 RAMP stated safety goal.

23 Significant work was performed to reduce wires down, including replacing  
24 overhead conductor, vegetation clearing, hardening of distribution circuits,  
25 infrared inspections of overhead lines to identify and repair hot spots,  
26 investigating wires down incidents, and implementing learnings/corrective  
27 actions.

28 **Monthly Data:** See Attachment A at the end of this report.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**ATTACHMENT A**  
**MONTHLY METRIC DATA TABLES**

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 1**

**TRANSMISSION AND DISTRIBUTION (T&D) OVERHEAD WIRES DOWN - NON-MAJOR EVENT DAYS**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	168	301	246	193	178	181	193	189	163	221	181	398	2,612
2	2015	158	237	143	185	154	198	183	225	188	219	274	409	2,573
3	2016	430	184	511	270	225	211	224	178	213	343	219	292	3,300
4	2017	283	376	378	242	263	238	233	215	230	204	246	157	3,065
5	2018	216	174	370	231	209	231	272	204	167	213	208	287	2,782
6	2019	335	249	335	238	311	206	198	210	216	138	232	341	3,009
7	2020	159	172	245	228	235	213	196	240	192	180	237	196	2,493
8	2021	261	187	292	174	217	238	213	181	208	255	248	265	2,739
9	2022	276	149	189	274	212	255	196	171	195	142	252	425	2,736
10	2023	383	231	772	211	175	152	177	253	147	157	197	219	3,074

(a) PG&E has utilized its Integrated Logging Information System-Operations Data Base (ILIS-ODB) to provide the number of distribution outages that involved distribution wire down event conditions.

(b) Distribution wire down conditions during PSPS events are not included in these totals since these typically occur when the lines are de-energized and are generally not the initiating cause of the reported outage event.

(c) PG&E's current definition for distribution wire down events are only related to sustained outages of its primary distribution system reported in its ILIS-ODB data base.

(d) Transmission wire down events were not tracked until 2012 and 2013 was the first year distribution wire down events were uniformly tracked.

(e) The data in this table is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 2**

**TRANSMISSION AND DISTRIBUTION (T&D) OVERHEAD WIRES DOWN - MAJOR EVENT DAYS**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	168	301	246	193	178	181	193	216	163	221	181	1,146	3,387
2	2015	158	714	143	189	154	211	215	225	188	225	274	580	3,276
3	2016	430	274	714	270	225	211	224	178	213	397	219	292	3,647
4	2017	1,947	1,402	378	468	263	253	233	215	325	486	246	256	6,472
5	2018	216	174	431	231	214	231	283	204	167	219	334	287	2,991
6	2019	880	1,786	335	238	311	229	198	219	232	283	524	341	5,576
7	2020	264	393	515	228	235	213	196	375	233	206	237	196	3,291
8	2021	1,471	187	292	174	217	238	224	222	224	775	248	1,547	5,819
9	2022	276	149	189	274	212	255	196	171	223	142	252	793	3,132
10	2023	2,166	1,627	1,679	211	175	152	177	253	160	157	197	219	7,173

- (a) PG&E has utilized its Integrated Logging Information System-Operations Data Base (ILIS-ODB) to provide the number of distribution outages that involved distribution wire down event conditions.
- (b) Distribution wire down conditions during PSPS events are not included in these totals since these typically occur when the lines are de-energized and are generally not the initiating cause of the reported outage event.
- (c) PG&E's current definition for distribution wire down events are only related to sustained outages of its primary distribution system reported in its ILIS-ODB data base.
- (d) Transmission wire down events were not tracked until 2012 and 2013 was the first year distribution wire down events were uniformly tracked.
- (e) The data in this table is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 3**

**ELECTRIC EMERGENCY RESPONSE TIME**

**"Average and median time in minutes to respond on-site"  
2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	avg												35
		med												
2	2015	avg	39	65	32	34	42	41	37	34	43	37	33	39
		med	29	34	28	28	27	28	28	27	28	28	26	27
3	2016	avg	39	32	32	43	39	33	39	33	37	33	46	37
		med	27	26	27	28	28	28	28	28	27	29	28	28
4	2017	avg	42	46	40	46	35	33	33	40	32	31	40	40
		med	31	33	28	31	27	30	30	28	29	27	28	30
5	2018	avg	27	30	35	41	38	39	39	35	36	37	36	36
		med	25	27	26	28	27	29	27	28	28	28	30	28
6	2019	avg	31	46	31	37	35	25	31	31	32	37	32	41
		med	29	32	29	30	31	29	30	30	31	32	30	30
7	2020	avg	31	39	30	30	29	30	33	30	30	30	30	31
		med	29	31	29	29	28	30	30	31	29	29	29	29
8	2021	avg	36	30	30	29	29	29	31	30	35	32	34	32
		med	32	29	29	27	29	28	29	30	32	31	30	30
9	2022	avg	37	30	30	30	30	30	30	30	30	31	31	31
		med	30	30	30	30	30	30	30	30	30	30	30	30
10	2023	avg	34	34	37	36	34	34	33	33	32	32	32	32
		med	32	32	32	31	31	31	30	30	30	30	29	29

(a) PG&E began tracking monthly data in 2015

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 4**

**FIRE IGNITIONS**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	1	1	1	2	3	49	74	40	36	41	18	12	277
2	2015	4	13	13	24	36	97	78	71	62	41	15	11	465
3	2016	2	5	1	26	38	83	67	66	59	37	7		391
4	2017	9	3	7	19	44	99	110	80	69	102	23	19	584
5	2018	5	8	6	10	37	101	88	72	50	35	30	3	445
6	2019	4	5	3	18	41	83	73	63	69	81	35	6	481
7	2020	1	16	11	17	52	106	67	86	54	60	28	16	514
8	2021	43	12	18	33	74	95	64	46	33	49	9	5	481
9	2022	5	18	21	45	64	80	69	57	58	33	15	2	467
10	2023	8	17	4	19	24	54	77	61	47	32	27	8	378

(a) Metric includes all powerline-involved fire incidents annually reportable to the CPUC per Decision 14-02-015 and within the entire PG&E service territory (not just HFTD). CPUC Fire Incident Data Collection Plan - For the purposes of the Data Collection Proposal, a reportable event is any event where utility facilities are associated with the following conditions: 1) A self-propagating fire of material other than electrical and/or communication facilities, and 2) The resulting fire traveled greater than one linear meter from the ignition point, and 3) The utility has knowledge that the fire occurred.

(b) PG&E began tracking this metric in 2014. The full year of metric data is only available for 2014-2023.

(c) PG&E has included 2 ignitions in 2023 that meet Electric Incident Report criteria, defined by Appendix B to CPUC D.06-04-055. PG&E has not formed a conclusion about the origin or cause of these particular ignitions.

(d) The Ignition Investigation CPUC reportable counts are subject to potential changes as new findings emerge during the ongoing investigation process. PG&E reserves making the final determination on CPUC reportability until our reporting data to the commission, April 1st the following calendar year, to allow for the maximum time to perform

2023 SAFETY PERFORMANCE METRICS

TABLE 5  
GAS DIG-INS  
2014-2023

Line No.	Year	UOM	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	Gas Tickets													671313
2	2014	3rd Party Dig-ins													1621
3	2014	3rd Party Dig-in Ratio													2.41
4	2015	Gas Tickets													788901
5	2015	3rd Party Dig-ins													1694
6	2015	3rd Party Dig-in Ratio													2.15
7	2016	Gas Tickets	60154	68599	73839	69660	74564	76594	70610	84300	78050	73127	68549	60926	858972
8	2016	3rd Party Dig-ins	84	115	114	114	147	179	167	211	190	142	145	91	1734
9	2016	3rd Party Dig-in Ratio	1.4	1.68	1.54	2.11	2	2.34	2.37	2.5	2.43	1.94	2.12	1.49	2.02
10	2017	Gas Tickets	62163	61145	82191	73287	85233	84379	77764	90450	81709	89552	80815	73387	942665
11	2017	3rd Party Dig-ins	65	79	155	128	175	181	192	205	162	172	129	137	1780
12	2017	3rd Party Dig-in Ratio	1.05	1.29	1.89	1.75	2.04	2.15	2.47	2.27	1.98	1.92	1.6	1.87	1.89
13	2018	Gas Tickets	82986	77901	84149	89657	95567	91232	94206	104059	87105	101917	85994	74937	1069710
14	2018	3rd Party Dig-ins	93	127	96	137	195	160	179	174	159	164	131	103	1718
15	2018	3rd Party Dig-in Ratio	1.12	1.63	1.14	1.53	2.04	1.75	1.9	1.67	1.83	1.61	1.52	1.37	1.61
16	2019	Gas Tickets	90140	93011	122101	130536	128393	122987	145646	157091	155556	165328	129355	115970	1556114
17	2019	3rd Party Dig-ins	83	76	98	132	135	161	188	193	156	178	137	82	1619
18	2019	3rd Party Dig-in Ratio	0.92	0.82	0.8	1.01	1.05	1.31	1.29	1.23	1	1.08	1.06	0.71	1.04
19	2020	Gas Tickets	132997	130127	124530	119393	126695	142897	140577	134692	141309	136592	102979	102140	1534928
20	2020	3rd Party Dig-ins	88	111	96	114	123	153	188	175	169	148	119	120	1604
21	2020	3rd Party Dig-in Ratio	0.66	0.85	0.77	0.95	0.97	1.07	1.34	1.3	1.2	1.08	1.16	1.17	1.05
22	2021	Gas Tickets	104556	129518	165637	167973	156393	162111	150562	162597	128307	119879	119327	106685	1673545
23	2021	3rd Party Dig-ins	114	104	118	143	134	169	150	163	151	130	97	58	1531
24	2021	3rd Party Dig-in Ratio	1.09	0.80	0.71	0.85	0.86	1.04	1.00	1.00	1.18	1.08	0.81	0.54	0.91
25	2022	Gas Tickets	123,346	118,056	136,994	120,911	128,489	133,665	120,526	147,872	151,495	163,674	135,757	103,980	1,584,765
26	2022	3rd Party Dig-ins	111	101	132	110	139	140	135	144	114	122	90	41	1379
27	2022	3rd Party Dig-in Ratio	0.90	0.86	0.96	0.91	1.08	1.05	1.12	0.97	0.75	0.75	0.66	0.39	0.87
28	2023	Gas Tickets	84,550	81,594	101,177	110,662	111,848	104,490	99,867	116,426	113,640	124,174	114,519	90,616	1,253,563
29	2023	3rd Party Dig-ins	75	76	62	109	121	119	106	128	137	108	116	73	1230
30	2023	3rd Party Dig-in Ratio	0.89	0.93	0.61	0.98	1.08	1.14	1.06	1.10	1.21	0.87	1.01	0.81	0.98

(a) PG&E has EOY data available as of 2014. Monthly data not available for years 2014 and 2015.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 6  
GAS IN-LINE INSPECTION  
2014-2023  
"Miles Inspected"**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY (miles inspected)	Current System Total (Transmission)	% of Transmission Lines Inspected Annually
1	2014		52.1	20.3	17.9	11.9	6.4	66.8		6.9	96.3		142.8	421.3	5733	7%
2	2015			133.3				23.0	60.2	43.8		5.1		265.4	6541	4%
3	2016	3.0	7.1	0.8	15.9	29.0	12.8	57.5	8.6	7.7	114.6	1.9	0.6	259.5	6530	4%
4	2017	0.7	21.3			33.4	73.4	9.1	28.0	27.3		55.4	60.2	308.8	6535	5%
5	2018	43.2	22.4	7.4	36.9	42.9	0.6	1.3	18.3	6.0	75.2	43.2		297.4	6531	5%
6	2019	0.0	22.5	39.9	44.8	88.7	54.1	13.7	121.8	17.1	12.8	53.3	9.3	478.0	6498	7%
7	2020	0.4	0.0	29.0	62.7	67.3	120.9	17.1	25.7	1.3	8.9	22.4	4.0	359.6	6551	5%
8	2021	0.0	94.9	91.6	0.1	73.0	160.5	108.8	152.5	137.7	0.1	74.6	76.7	970.5	6417	15%
9	2022	0.0	0.0	85.2	6.5	73.2	27.2	0.1	125.9	33.6	12.9	110.1	22.8	497.6	6425	8%
10	2023		9.9	54.6	22.0	0.1	38.3	10.1	76.6	11.5	172.9	54.7	10.8	461.5	6386	7%

(a) Includes miles inspected for PSEP and base reliability work



**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 7**

**GAS IN-LINE UPGRADE**

**2014-2023**

**"Miles Upgraded"**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Miles Upgraded
1	2014	6.7		21.9		32.9					4.0	6.4		71.9
2	2015					6.3		12.2		11.2	5.8	11.3	25.3	72.1
3	2016	1.5				44.3	21.7	11.9		4.8	10.5	12.4		107.2
4	2017						54.2				53.4	22.4	24.4	154.4
5	2018							13.1			97.9	63.2	68.7	243.0
6	2019			36.3	62.8	2.6		3.1		70.7	10.7		59.6	245.7
7	2020			44.0	43.6	47.2	55.9	85.9			48.8	95.5	43.3	464.2
8	2021				26.7	65.9	21.9	6.6		14.5			10.0	145.6
9	2022			4.7		39.4	36.0	4.6	24.7	40.5	82.2	20.4		252.6
10	2023							32.9		12.2	9.9		5.7	60.8

(a) Includes miles upgraded in both PSEP and base reliability programs.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 8**

**SHUT IN THE GAS MEDIUM TIME - MAINS  
2014-2023**

**"Median Number of Minutes"**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY (Median)	EOY (Avg)
1	2014													97.0	120.8
2	2015													87.0	102.8
3	2016													87.0	104.4
4	2017													89.0	103.8
5	2018													73.0	88.8
6	2019													73.7	85.1
7	2020													77.1	93.7
8	2021													73.3	102.6
9	2022													82.1	97.0
10	2023													80.0	96.6

(a) Monthly data not available due to various tools/databases utilized to measure SITG since 2012.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 9**

**SHUT IN THE GAS AVERAGE TIME - SERVICES**

**2014-2023**

**"Median Number of Minutes"**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY (Median)	EOY (Avg)
1	2014													38.0	52.2
2	2015													40.0	49.0
3	2016													37.0	45.8
4	2017													36.0	45.2
5	2018													34.0	43.3
6	2019													33.6	41.4
7	2020													33.0	41.9
8	2021													32.3	43.5
9	2022													36.8	47.5
10	2023													35.3	45.4

(a) Monthly data not available due to various tools/databases utilized to measure SITG since 2012.

2023 SAFETY PERFORMANCE METRICS REPORT

TABLE 10

CROSS BORE INTRUSIONS

2014-2023

Line No.	Year	Unit Type	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	Inspections Complete													33,570
2	2014	Cross Bores Found													193
3	2014	Find Rate													5.72
4	2015	Inspections Complete													23,531
5	2015	Cross Bores Found													104
6	2015	Find Rate													4.42
7	2016	Inspections Complete	707	520	1467	1023	901	748	2064	1874	5276	2233	4494	2346	23,653
8	2016	Cross Bores Found	4	1	7	6	7	9	11	11	11	7	8	8	90
9	2016	Find Rate	5.66	1.92	4.77	5.87	7.77	12.03	5.33	5.87	1.33	4.93	1.78	3.41	3.81
10	2017	Inspections Complete	509	1000	1438	1923	2031	1936	653	3023	4707	5481	6291	6168	35,160
11	2017	Cross Bores Found	1	5	15	4	5	1	2	2	1	3	0	0	38
12	2017	Find Rate	1.96	3.98	7.13	5.13	4.35	3.51	3.48	2.72	2.03	1.67	1.31	1.08	1.08
13	2018	Inspections Complete	3232	3215	2166	4419	3568	4407	4463	5613	4851	2701	3844	3569	46,048
14	2018	Cross Bores Found	2	5	4	4	6	2	3	4	1	6	1	7	45
15	2018	Find Rate	0.62	1.09	1.28	1.15	1.27	1.09	1.02	0.97	0.86	0.96	0.89	0.98	0.98
16	2019	Inspections Complete	1739	1647	4365	2086	2816	9120	3480	6103	3035	3780	3880	1374	43,425
17	2019	Cross Bores Found	5	3	6	3	3	1	5	5	3	2	2	2	40
18	2019	Find Rate	0.62	1.09	1.28	1.15	1.27	1.09	1.02	0.97	0.86	0.96	0.89	0.98	0.98
19	2020	Inspections Complete	1788	1211	493	1435	1295	3052	681	1743	396	1720	622	2229	16,665
20	2020	Cross Bores Found	5	3	7	10	4	1	7	3	4	3	6	3	56
21	2020	Find Rate	2.80	2.67	4.30	5.07	4.66	3.23	3.72	3.42	3.64	3.40	3.67	3.36	3.36
22	2021	Inspections Complete	1317	1389	1954	2300	1583	1629	2413	2593	3945	3278	3512	2380	28,293
23	2021	Cross Bores Found	0	1	9	2	0	2	2	3	3	0	0	1	23
24	2021	Find Rate	0.00	0.37	2.15	1.72	1.40	1.38	1.27	1.25	1.15	0.98	0.85	0.81	0.81
25	2022	Inspections Complete	0	0	4020	4178	3890	3711	4353	4535	5804	5928	2796	3430	42,645
26	2022	Cross Bores Found	0	0	1	1	8	8	2	2	2	4	2	2	32
27	2022	Find Rate	0.00	0.00	0.25	0.24	0.83	1.14	0.99	0.89	0.79	0.77	0.77	0.75	0.75
28	2023	Inspections Complete	1542	1429	1160	980	634	875	664	584	153	8	23	33	80,85
29	2023	Cross Bores Found	0	1	3	9	2	3	0	0	2	2	3	2	29
30	2023	Find Rate (CROSS BORE INTRUSIONS PER 1,000 INSPECTIONS)	0.00	0.34	0.97	2.54	2.61	2.72	2.47	2.54	2.74	2.99	3.35	3.59	3.59

(a) PG&E did not track this metric before 2013.

(b) From 2013-2015, the Cross-Bore Inspection Program was executed by an external contractor. Monthly data is not currently available.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 11A**

**GAS EMERGENCY RESPONSE TIME**

**2014-2023**

**MEDIAN MINUTES**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Median Emergency Response Time
1	2014	18.1	18.3	18.3	17.8	18.0	17.8	17.4	17.8	18.2	18.4	18.4	18.0	18.1
2	2015	18.0	18.1	18.2	18.3	18.4	18.7	18.8	19.2	18.9	18.5	18.5	18.2	18.5
3	2016	18.8	18.5	18.4	18.4	18.2	18.1	18.1	18.2	18.0	18.0	15.2	18.3	18.3
4	2017	18.4	18.2	18.1	18.2	18.4	18.8	19.5	19.0	18.8	19.2	15.4	19.1	18.7
5	2018	18.8	18.6	18.5	18.8	18.7	18.8	18.9	19.3	19.3	19.1	18.7	18.5	18.8
6	2019	18.7	19.1	18.9	18.4	18.4	19.0	19.0	19.0	19.3	19.4	19.3	18.9	18.9
7	2020	19.0	19.1	17.8	17.7	18.5	19.1	19.2	19.1	18.7	18.9	19.1	18.8	18.8
8	2021	19.0	19.0	18.9	18.8	18.9	18.7	18.7	18.7	18.8	18.8	19.0	18.8	18.8
9	2022	18.7	18.3	17.8	18.0	18.4	18.2	18.1	18.1	18.4	18.2	18.3	18.5	18.3
10	2023	18.9	18.4	18.3	18.7	18.3	17.9	18.0	18.2	17.9	18.0	17.9	17.6	18.2

**TABLE 11B**

**GAS EMERGENCY RESPONSE TIME**

**2014-2023**

**AVERAGES**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Average Emergency Response Time
1	2014	19.9	20.3	20.0	19.7	19.9	19.6	19.4	19.7	20.2	20.2	20.4	19.7	20.0
2	2015	19.7	19.8	20.1	20.1	20.5	20.7	20.8	21.0	20.7	20.4	20.4	19.9	20.3
3	2016	20.6	20.2	20.1	20.2	19.8	19.9	19.8	19.7	20.0	19.6	19.9	20.0	20.0
4	2017	20.2	19.9	19.7	19.8	20.0	20.5	21.1	20.8	21.1	20.9	20.8	21.0	20.4
5	2018	20.5	20.5	20.3	20.5	20.4	20.5	20.8	21.2	21.3	21.0	20.4	20.4	20.6
6	2019	20.6	21.0	20.7	20.0	20.1	20.8	20.9	20.8	21.2	21.2	21.3	20.8	20.8
7	2020	20.9	20.9	19.5	19.4	20.3	20.7	20.8	20.9	20.3	20.4	21.5	20.5	20.5
8	2021	20.8	20.7	20.7	20.6	20.6	20.6	20.6	20.5	20.5	20.5	20.6	20.6	20.6
9	2022	20.4	19.7	19.4	19.6	19.9	19.9	19.8	19.6	20.2	19.9	20.0	20.4	19.9
10	2023	20.7	20.0	20.0	20.2	19.8	19.5	19.6	19.8	19.4	19.5	19.6	19.2	19.8

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**TABLE 12**  
**NATURAL GAS STORAGE BASELINE INSPECTIONS PERFORMED**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Well Baseline Inspections	EOY % Progress to Goal <sup>a</sup>
1	2014								2	3	1			6	see note (a)
2	2015						2	1	2	1				6	see note (a)
3	2016					1	1		2	3		1	1	9	see note (a)
4	2017							1	1	2	2	1		7	see note (a)
5	2018					3	2	4	2	1	1			13	see note (a)
6	2019			1	1	2	2	2	2	1	1	2		14	13%
7	2020				3	3	5	3	4	2				20	31%
8	2021			1	1	4	5	5				1		17	47%
9	2022			3	3	3	5	2	1	1				18	63%
10	2023			3	1	2	3	2	3	2	3	1	1	21	83%

(a) PG&E has a goal to complete baseline well production casing assessments on 109 wells by 2024 per plan approved by CalGEM. Wells baselined prior to 2019 will be re-baselined using an

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 13**

**GAS SYSTEM INTERNAL INSPECTION STATUS**

**2014-2023**

**System Piggability**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY System Piggability	EOY Piggable Mileage Total
1	2014													22.99%	1506
2	2015													24.11%	1580
3	2016													25.75%	1687
4	2017													28.03%	1836
5	2018													31.73%	2079
6	2019													35.48%	2325
7	2020													42.55%	2788
8	2021													46.08%	2957
9	2022													49.82%	3201
10	2023													50.93%	3253

(a) Piggability % is dynamic since the Current system total mileage changes over the course of the year. Monthly data: we don't have the data available since the # of transmission miles is constar

**2022 SAFETY PERFORMANCE METRICS REPORT  
2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 14  
DART RATE**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	0.27	0.19	0.28	0.38	0.35	0.37	0.37	0.38	0.86	0.94	0.98	1.05	1.05
2	2015	0.23	0.59	0.72	0.70	0.73	1.11	1.25	1.33	1.39	1.46	1.53	1.52	1.52
3	2016	0.57	1.41	1.39	1.31	1.33	1.31	1.35	1.51	1.58	1.52	1.59	1.70	1.70
4	2017	0.36	0.83	1.05	1.61	1.90	1.89	2.03	2.03	2.01	2.02	1.99	1.99	1.99
5	2018	1.22	1.30	1.29	1.47	1.56	1.51	1.65	1.74	1.81	1.78	1.74	1.81	1.81
6	2019	0.65	0.98	1.43	1.66	1.76	1.89	1.96	2.09	2.01	2.03	2.04	2.05	2.05
7	2020	0.76	1.44	1.34	1.30	1.19	1.17	1.22	1.37	1.31	1.36	1.37	1.34	1.34
8	2021	0.36	0.76	0.78	0.94	1.05	1.13	1.07	1.02	0.98	1.02	1.02	1.01	1.01
9	2022	0.10	0.33	0.53	0.61	0.58	0.60	0.63	0.64	0.65	0.63	0.62	0.67	0.67
10	2023	0.26	0.44	0.47	0.53	0.62	0.61	0.62	0.69	0.72	0.71	0.70	0.70	0.70

(a) Change in reporting process in 2016 which resulted in earlier classification

(b) Rates are company-wide

(c) Rates are cumulative

(d) Rates are by classification date



**2023 SAFETY PERFORMANCE METRICS REPORT  
TABLE 15A**

**Rate of EMPLOYEE SIF Actual using EEI SCL Model  
2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY	EOY Rate SPM (SCL model)	EOY Labor Hours
1	2014															
2	2015															
3	2016															
4	2017	0	1	0	1	0	0	0	0	0	0	0	0	3	0.013	46,859,884
5	2018	0	0	0	0	0	0	0	1	0	0	0	0	1	0.004	45,913,811
6	2019	0	0	0	0	0	0	0	0	0	0	0	0	0	0.000	46,684,596
7	2020	0	0	1	0	0	0	0	1	0	0	1	1	4	0.016	49,672,365
8	2021	0	0	0	0	0	0	0	0	0	0	0	0	0	0.000	51,877,570
9	2022	0	0	0	1	0	0	1	0	1	0	0	0	3	0.012	51,472,190
10	2023	1	0	0	1	0	1	0	0	0	0	0	0	3	0.011	54,186,956

(a) PG&E started tracking Employee SIF Actuals using the EEI SCL Model in 2017.

Labor hours by Month

Years	January	February	March	April	May	June	July	August	September	October	November	December
2017	3,896,332	3,771,980	4,333,833	3,765,548	4,251,370	4,004,976	3,517,755		3,745,093	4,308,181	3,687,157	3,441,936
2018	3,598,158	3,610,153	4,120,015	3,755,744	3,963,225	3,745,561	3,670,275	4,221,669	3,549,021	4,264,909	4,117,251	3,297,829
2019	3,707,483	3,823,635	3,939,982	3,934,898	3,955,218	3,654,569	3,867,271	3,984,534	3,793,849	4,686,374	3,595,922	3,740,862
2020	3,673,876	3,681,169	4,145,234	4,038,426	3,761,387	4,256,322	4,421,339	4,334,463	4,573,318	4,882,418	3,694,751	4,209,662
2021	3,839,472	4,020,854	4,883,961	4,466,083	4,094,847	4,471,078	4,233,635	4,554,241	4,353,125	4,468,465	3,940,192	4,393,539
2022	3,979,523	3,956,928	4,904,881	4,401,608	4,469,137	4,307,925	3,926,194	4,691,017	4,362,886	4,413,172	4,020,005	4,038,914
2023	4,579,056	4,113,526	5,275,478	4,094,301	4,596,734	4,394,232	4,144,950	4,843,326	4,497,490	5,048,984	4,487,642	4,111,237

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 15B**

**Rate of EMPLOYEE SIF Actual using OSHA definition  
2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY	EOY Rate	EOY Labor Hours
1	2014	0	0	0	0	0	0	0	1	0	1	0	0	2	0.009	45,772,256
2	2015	0	1	0	1	0	1	0	0	1	0	0	0	5	0.021	46,832,638
3	2016	1	0	0	0	0	1	1	0	1	0	1	0	4	0.017	48,269,076
4	2017	1	2	0	2	0	1	1	0	0	0	0	0	7	0.030	46,859,884
5	2018	0	0	0	1	0	0	0	1	0	0	0	1	3	0.013	45,913,811
6	2019	1	1	0	0	0	0	0	0	1	0	1	0	4	0.017	46,684,596
7	2020	1	0	1	0	0	0	0	2	0	0	1	1	6	0.024	49,672,365
8	2021	0	0	0	0	0	0	0	0	1	0	0	0	1	0.004	51,877,570
9	2022	0	0	0	2	0	1	1	0	1	0	0	0	5	0.019	51,472,190
10	2023	1	1	1	1	2	1	1	0	0	0	0	0	8	0.030	54,186,956

Labor hours by Month

Years	January	February	March	April	May	June	July	August	September	October	November	December
2017	3,896,332	3,771,980	4,333,833	3,765,548	4,251,370	4,004,976	3,517,755	4,135,723	3,745,093	4,308,181	3,687,157	3,441,936
2018	3,598,158	3,610,153	4,120,015	3,755,744	3,963,225	3,745,561	3,670,275	4,221,669	3,549,021	4,264,909	4,117,251	3,297,829
2019	3,707,483	3,823,635	3,939,982	3,934,898	3,955,218	3,654,569	3,867,271	3,984,534	3,793,849	4,686,374	3,595,922	3,740,862
2020	3,673,876	3,681,169	4,145,234	4,038,426	3,761,387	4,256,322	4,421,339	4,334,463	4,573,318	4,882,418	3,694,751	4,209,662
2021	3,839,472	4,020,854	4,883,961	4,466,083	4,094,847	4,471,078	4,233,635	4,554,241	4,353,125	4,468,465	3,940,192	4,393,539
2022	3,979,523	3,956,928	4,904,881	4,401,608	4,469,137	4,307,925	3,926,194	4,691,017	4,362,886	4,413,172	4,020,005	4,038,914
2023	4,579,056	4,113,526	5,275,478	4,094,301	4,596,734	4,394,232	4,144,950	4,843,326	4,497,490	5,048,984	4,487,642	4,111,237

Rates

Years	January	February	March	April	May	June	July	August	September	October	November	December
2017	0.051	0.106	0.000	0.106	0.000	0.050	0.057	0.000	0.000	0.000	0.000	0.000
2018	0.000	0.000	0.000	0.053	0.000	0.000	0.000	0.047	0.000	0.000	0.000	0.061
2019	0.054	0.052	0.000	0.000	0.000	0.000	0.000	0.000	0.053	0.000	0.056	0.000
2020	0.054	0.000	0.048	0.000	0.000	0.000	0.000	0.092	0.000	0.000	0.054	0.048
2021	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.046	0.000	0.000	0.000
2022	0.000	0.000	0.000	0.091	0.000	0.046	0.051	0.000	0.046	0.000	0.000	0.000
2023	0.044	0.049	0.038	0.049	0.044	0.091	0.048	0.000	0.000	0.000	0.000	0.000

**2023 SAFETY PERFORMANCE METRICS REPORT  
TABLE 16A**

**Rate of CONTRACTOR SIF Actual using EEI SCL Model  
2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Rate
1	2014													
2	2015													
3	2016													
4	2017													0.01
5	2018													0.01
6	2019													0.01
7	2020	0.00	0.00	0.00	0.00	0.00	0.25	0.10	0.00	0.08	0.04	0.00	0.00	0.04
8	2021	0.00	0.00	0.05	0.00	0.09	0.04	0.00	0.00	0.00	0.03	0.03	0.00	0.02
9	2022	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.06	0.00	0.00	0.00	0.05	0.01
10	2023	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.004

(a) PG&E started tracking Contractor SIF Actuals using the EEI SCL Model in 2017 annually and 2020 monthly.

**SIF A Counts**

Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Total
2017				1						1			2
2018		1							1				2
2019						1	2						3
2020	0	0	0	0	0	5	2	0	2	1	0	0	10
2021	0	0	1	0	2	1	0	0	0	1	1	0	6
2022	0	0	0	0	1	0	0	2	0	0	0	1	4
2023	1	0	0	0	0	0	0	0	0	0	0	0	1

**Labor Hours**

Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Total
2017													35,549,334
2018													37,533,432
2019													45,602,936
2020	4,679,580	4,184,702	4,092,337	3,362,517	3,705,474	3,957,041	3,902,279	4,148,883	5,155,493	5,213,213	4,522,152	3,803,737	50,727,409
2021	3,694,147	3,572,311	4,088,318	4,342,521	4,243,240	4,892,206	4,875,056	5,699,173	6,406,370	6,753,807	5,964,609	6,086,095	60,617,853
2022	5,311,209	5,245,628	5,950,423	6,202,406	6,023,686	6,182,635	5,871,857	6,190,324	6,448,971	6,035,112	4,236,212	3,657,865	67,356,326
2023	4,172,820	3,987,163	4,616,137	4,822,905	5,188,900	5,285,016	4,926,162	6,422,173	5,855,195	5,065,414	3,910,259	2,685,576	56,937,719

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**TABLE 16B**  
**Rate of CONTRACTOR SIF Actual using OSHA definition**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY	EOY Rate	EOY Labor Hours
1	2014	0	0	0	0	0	0	0	0	1	1	0	0	2		
2	2015	0	0	0	0	0	0	0	0	0	1	0	1	2		
3	2016	0	0	0	0	0	0	0	0	0	0	0	1	1		
4	2017	0	1	0	1	0	0	0	0	0	1	0	0	3	0.02	35,549,334
5	2018	0	1	0	0	0	0	0	2	1	0	0	0	4	0.02	37,533,432
6	2019	0	0	0	0	0	4	3	0	0	0	0	0	7	0.03	45,602,936
7 (a)	2020	0	0	1	0	0	4	2	0	5	1	0	1	14	0.06	50,727,409
8	2021	0	1	2	2	3	3	0	0	0	1	1	0	13	0.04	60,617,853
9	2022	2	0	0	0	1	0	0	2	0	0	0	1	6	0.02	67,356,326
10	2023	2	0	1	0	0	0	0	0	0	0	0	0	3	0.01	56,937,719

(a) Four additional SIF events were added to July and September for 2020. There was a gap in the process which resulted in under-reported incidents at the end of the year.

Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Total
2019	2,806,768	3,050,589	3,330,635	3,429,181	3,948,334	3,716,684	3,905,669	4,507,574	4,031,132	4,477,318	4,370,348	4,028,703	45,602,936
2020	4,679,580	4,184,702	4,092,337	3,362,517	3,705,474	3,957,041	3,902,279	4,148,883	5,155,493	5,213,213	4,522,152	3,803,737	50,727,409
2021	3,694,147	3,572,311	4,088,318	4,342,521	4,243,240	4,892,206	4,875,056	5,699,173	6,406,370	6,753,807	5,964,609	6,086,095	60,617,853
2022	5,311,209	5,245,628	5,950,423	6,202,406	6,023,686	6,182,635	5,871,857	6,190,324	6,448,971	6,035,112	4,236,212	3,657,865	67,356,326
2023	4,172,820	3,987,163	4,616,137	4,822,905	5,188,900	5,285,016	4,926,162	6,422,173	5,855,195	5,065,414	3,910,259	2,685,576	56,937,719

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 17**

**RATE OF SIF POTENTIAL - EMPLOYEE**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016													
4	2017	0.10	0.11	0.09	0.16	0.19	0.25	0.06	0.19	0.05	0.14	0.05	0.17	0.13
5	2018	0.06	0.06	0.10	0.11	0.05	0.00	0.16	0.14	0.17	0.09	0.10	0.06	0.09
6	2019	0.16	0.16	0.10	0.20	0.25	0.27	0.05	0.05	0.05	0.13	0.22	0.05	0.14
7	2020	0.05	0.27	0.10	0.05	0.16	0.00	0.14	0.09	0.00	0.04	0.22	0.10	0.10
8	2021	0.10	0.00	0.04	0.09	0.00	0.13	0.14	0.09	0.09	0.13	0.05	0.18	0.09
9	2022	0.00	0.10	0.16	0.14	0.00	0.05	0.00	0.00	0.09	0.05	0.10	0.00	0.06
10	2023	0.09	0.05	0.04	0.24	0.09	0.18	0.10	0.04	0.00	0.04	0.13	0.05	0.08

(a) Rates are monthly

(b) PG&E started tracking Employee SIF Potentials in 2017

**SIF P Counts**

Years	January	February	March	April	May	June	July	August	September	October	November	December	EOY
2017	2	2	2	3	4	5	1	4	1	3	1	3	31
2018	1	1	2	2	1	0	3	3	3	2	2	1	21
2019	3	3	2	4	5	5	1	1	1	3	4	1	33
2020	1	5	2	1	3	0	3	2	0	1	4	2	24
2021	2	0	1	2	0	3	3	2	2	3	1	4	23
2022	0	2	4	3	0	1	0	0	2	1	2	0	15
2023	2	1	1	5	2	4	2	1	0	1	3	1	23

**Labor hours by Month**

Years	January	February	March	April	May	June	July	August	September	October	November	December	EOY
2017	3,896,332	3,771,980	4,333,833	3,765,548	4,251,370	4,004,976	3,517,755	4,135,723	3,745,093	4,308,181	3,687,157	3,441,936	46,859,884
2018	3,598,158	3,610,153	4,120,015	3,755,744	3,963,225	3,745,561	3,670,275	4,221,669	3,549,021	4,264,909	4,117,251	3,297,829	45,913,811
2019	3,707,483	3,823,635	3,939,982	3,934,898	3,955,218	3,654,569	3,867,271	3,984,534	3,793,849	4,686,374	3,595,922	3,740,862	46,684,596
2020	3,673,876	3,681,169	4,145,234	4,038,426	3,761,387	4,256,322	4,421,339	4,334,463	4,573,318	4,882,418	3,694,751	4,209,662	49,672,365
2021	3,839,472	4,020,854	4,883,961	4,466,083	4,094,847	4,471,078	4,233,635	4,554,241	4,353,125	4,468,465	3,940,192	4,393,539	51,877,570
2022	3,979,523	3,956,928	4,904,881	4,401,608	4,469,137	4,307,925	3,926,194	4,691,017	4,362,886	4,413,172	4,020,005	4,038,914	51,472,190
2023	4,579,056	4,113,526	5,275,478	4,094,301	4,596,734	4,394,232	4,144,950	4,843,326	4,497,490	5,048,984	4,487,642	4,111,237	54,186,956

**2023 SAFETY PERFORMANCE METRICS REPORT  
TABLE 18**

**RATE OF SIF POTENTIAL - CONTRACTOR  
2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016													
4	2017													
5	2018													
6	2019													
7	2020						0.30	0.10	0.14	0.08	0.00	0.04	0.00	0.09
8	2021	0.11	0.00	0.10	0.09	0.24	0.29	0.00	0.14	0.12	0.12	0.03	0.16	0.12
9	2022	0.15	0.23	0.13	0.13	0.03	0.06	0.20	0.13	0.28	0.20	0.05	0.05	0.14
10	2023	0.10	0.10	0.13	0.08	0.12	0.26	0.12	0.09	0.07	0.12	0.05	0.07	0.11

(a) PG&E started tracking Contractor SIF Potentials in June of 2020  
(b) Rates are monthly

**Contractor SIF P Counts**

Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
2020						6	2	3	2	0	1	0	14
2021	2	0	2	2	5	7	0	4	4	4	1	5	36
2022	4	6	4	4	1	2	6	4	9	6	1	1	48
2023	2	2	3	2	3	7	3	3	2	3	1	1	32

**Contractor Hours Worked**

Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
2020						3,957,041	3,902,279	4,148,883	5,155,493	5,213,213	4,522,152	3,803,737	30,702,798
2021	3,694,147	3,572,311	4,088,318	4,342,521	4,243,240	4,892,206	4,875,056	5,699,173	6,406,370	6,753,807	5,964,609	6,086,095	60,617,853
2022	5,311,209	5,245,628	5,950,423	6,202,406	6,023,686	6,182,635	5,871,857	6,190,324	6,448,971	6,035,112	4,236,212	3,657,865	67,356,326
2023	4,172,820	3,987,163	4,616,137	4,822,905	5,188,900	5,285,016	4,926,162	6,422,173	5,855,195	5,065,414	3,910,259	2,685,576	56,937,719

**2023 SAFETY PERFORMANCE METRICS REPORT  
TABLE 19**

**CONTRACTOR DART CASE RATE**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016													
4	2017	0.73	0.22	0.68	0.41	0.74	0.46	0.90	0.44	0.58	0.33	0.81	0.47	0.56
5	2018	0.85	1.21	0.95	0.54	0.14	0.44	0.50	0.57	0.83	0.37	0.47	0.39	0.61
6	2019	0.36	0.13	0.49	0.65	0.77	0.55	0.58	0.27	0.51	0.60	0.25	0.43	0.47
7	2020	0.34	0.43	0.15	0.24	0.22	0.71	0.77	0.34	0.78	0.42	0.22	0.37	0.42
8	2021	0.27	0.22	0.44	0.18	0.42	0.16	0.16	0.11	0.09	0.33	0.20	0.12	0.32
9	2022	0.53	0.38	0.35	0.31	0.33	0.31	0.29	0.32	0.32	0.30	0.31	0.29	0.29
10	2023	0	0.1	0.35	0.17	0.19	0.38	0.37	0.47	0.14	0.39	0.61	0.22	0.29

(a) ISNetworld program implementation began in 2017

(b) Data is self-reported for PG&E performance work

(c) Rates are cumulative for 2023

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 20**

**PUBLIC SIF**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	1	4	3	5	6	1	8	5	2	3	8	10	56
2	2015	1	5	3	8	2	8	5	6	6	4	5	1	54
3	2016	2	0	2	4	6	2	2	4	2	3	2	0	29
4	2017	2	0	3	2	0	2	4	4	2	26	3	1	49
5	2018	0	5	2	1	4	1	1	1	2	0	88	1	106
6	2019	3	1	2	1	2	3	4	2	3	2	2	2	27
7	2020	0	0	2	1	2	2	2	0	1	1	1	2	14
8	2021	2	1	0	6	2	2	3	4	2	0	1	0	23
9	2022	3	2	2	4	2	2	1	2	2	2	1	0	23
10	2023	0	1	0	1	4	0	3	2	1	4	2	0	18

NOTE: Since the 2021 SPM Report, four wildfire incidents have been included as determined SPMs (Atlas, Redwood Valley, Nuns, and Cascade wildfires) The Kincaide and Zogg wildfire incidents are pending final determination and not included at this time.

Three incident have been added to the 2022 metrics. The total count for 2022 is now 23.



**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 21A**

**HELICOPTER / FLIGHT ACCIDENT OR INCIDENT (TOTAL INCIDENTS)**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014									1				1
2	2015													1
3	2016													
4	2017							1						1
5	2018													
6	2019													
7	2020						1	1						2
8	2021													
9	2022					1								2
10	2023													

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 21B**

**(total number of flight hours per year for reporting the number of incidents per 100,000 flight hours)**

**HELICOPTER / FLIGHT ACCIDENT OR INCIDENT**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	647	700	1,120	1,179	1,097	1,150	905	1,328	1,531	1,376	850	766	12,650
2	2015	931	927	1,045	1,121	1,254	1,768	1,448	1,632	1,668	1,531	761	675	14,759
3	2016	564	816	1,091	775	730	1,274	1,634	1,744	1,449	1,351	808	636	12,871
4	2017	747	940	1,085	619	1,089	1,212	1,243	1,578	1,738	2,347	1,003	1,157	14,758
5	2018	678	1,041	1,241	1,241	1,128	2,538	2,029	3,491	3,165	3,700	2,039	1,452	23,745
6	2019	1,369	1,620	1,747	2,299	2,356	2,471	2,889	3,439	4,017	5,871	2,748	1,674	32,500
7	2020	1,913	2,140	1,935	2,101	2,662	2,157	3,333	3,119	3,427	4,670	2,284	1,660	31,401
8	2021	1,118	562	3,358	311	3,850	824	4,290	3,007	4,021	3,564	3,236	1,934	30,079
9	2022	1,886	1,708	2,100	1,942	2,441	2,653	2,783	3,606	3,255	4,423	3,634	1,084	31,514
10	2023	976	2334	2377	2658	2938	3106	2209	2795	2883	2736	2621	1874	29508

PG&E does not have the data before 2017.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 22**

**PERCENTAGE OF SIF CORRECTIVE ACTIONS COMPLETED ON TIME**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016													
4	2017				100%	100%	100%	87%	94%	100%	100%	96%	100%	100%
5	2018	100%	100%	100%	100%	96%	97%	96%	95%	92%	93%	93%	93%	93%
6	2019	69%	89%	91%	95%	95%	96%	96%	97%	95%	95%	93%	94%	94%
7	2020	86%	75%	65%	72%	68%	71%	72%	78%	78%	79%	80%	79%	79%
8	2021	72%	86%	92%	92%	95%	95%	94%	95%	96%	96%	97%	97%	97%
9	2022	97%	98%	98%	97%	98%	97%	97%	98%	98%	98%	98%	98%	98%
10	2023	100%	100%	99%	99%	99%	99%	99%	98%	98%	98%	98%	98%	98%

(a) Tracking began in 2017

(b) Percentages are cumulative

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 23**

**HARD BRAKE RATE**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016	4.3	4.5	4.6	4.7	4.6	4.3	4.2	4.0	4.0	4.1	4.1	4.0	4.0
4	2017	3.3	3.3	3.4	3.4	3.5	3.6	3.7	3.7	3.7	3.7	3.6	3.6	3.6
5	2018	3.0	3.0	3.0	2.9	2.9	2.8	2.7	2.7	2.7	2.7	2.7	2.6	2.6
6	2019	2.1	2.2	2.2	2.2	2.2	2.2	2.1	2.1	2.1	2.1	2.1	2.1	2.1
7	2020	2.0	2.0	2.0	1.9	1.9	1.9	1.8	1.8	1.8	1.7	1.7	1.6	1.6
8	2021	1.0	1.0	0.9	0.9	0.9	0.8	0.8	0.7	0.7	0.6	0.6	0.6	0.6
9	2022	0.3	0.3	0.2	0.2	0.3	0.3	0.3	0.2	0.3	0.3	0.3	0.3	0.3
10	2023	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3

(a) Rates were not tracked until 2016

(b) Rates are cumulative

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 24**

**DRIVER'S CALL COMPLAINT RATE  
2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016	12.8	11.0	10.6	10.7	10.3	10.1	10.2	10.3	10.5	10.2	10.2	10.0	10.0
4	2017	6.5	7.9	8.5	8.2	8.4	8.6	8.4	9.4	9.7	8.0	7.9	8.0	8.0
5	2018	7.7	8.2	9.3	8.8	8.4	7.7	7.3	8.4	8.3	8.1	8.0	8.0	8.0
6	2019	5.4	6.2	6.3	5.7	5.8	6.0	6.4	6.4	6.3	6.3	6.1	5.9	5.9
7	2020	5.1	5.3	5.3	4.8	4.7	4.5	4.5	4.5	4.5	4.3	4.3	4.3	4.3
8	2021	2.6	2.5	2.7	3.0	2.7	2.7	4.3	4.5	4.7	4.7	4.6	4.5	4.5
9	2022	3.2	4.2	4.4	4.3	4.4	4.5	4.4	4.5	4.6	4.5	4.7	4.7	4.7
10	2023	6.8	6.1	6.0	6.0	5.7	5.4	5.2	5.1	5.0	4.8	4.7	4.6	4.6

(a) Rates were not tracked until 2016

(b) Rates are cumulative

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 25A**

**DISTRIBUTION WIRES-DOWN NOT RESULTING IN AUTOMATIC DE-ENERGIZATION (ANNUAL)**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2	2015	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3	2016	9.4%	15.7%	13.2%	14.7%	11.3%	17.7%	13.7%	15.3%	15.6%	15.1%	16.1%	10.7%	13.6%
4	2017	8.0%	7.3%	9.1%	10.1%	14.7%	13.5%	14.6%	19.0%	15.0%	9.6%	12.9%	15.1%	10.1%
5	2018	10.8%	9.5%	10.8%	15.4%	16.7%	18.4%	13.1%	20.1%	14.7%	14.9%	15.1%	12.3%	14.1%
6	2019	12.3%	9.0%	13.6%	13.7%	11.4%	15.7%	16.4%	15.0%	13.9%	15.9%	10.7%	13.9%	11.9%
7	2020	14.3%	11.8%	10.4%	17.6%	26.3%	23.7%	25.5%	18.6%	18.2%	18.8%	19.2%	9.7%	16.9%
8	2021	9.0%	14.8%	21.6%	19.8%	14.0%	20.3%	22.0%	23.4%	17.3%	18.4%	21.2%	8.0%	13.7%
9	2022	10.7%	20.3%	19.8%	14.4%	14.5%	13.9%	13.8%	15.5%	15.8%	17.6%	15.8%	10.8%	14.1%
10	2023	7.7%	6.8%	7.8%	10.0%	15.1%	17.2%	16.5%	10.8%	15.1%	14.7%	21.5%	16.5%	9.3%

- (a) PG&E updated its reporting tools and began reporting energized distribution wire down events starting in 2015 with 2016 being the first full year reporting these events.
- (b) For safety reasons, field personnel generally treat wire down events as energized if unknown and these percentages represent the information reported as actually being energized.
- (c) The data in this table is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

**TABLE 25B  
TRANSMISSION WIRES-DOWN NOT RESULTING IN AUTOMATIC DE-ENERGIZATION (ANNUAL)  
2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2	2015	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3	2016	0.0%	16.7%	0.0%	25.0%	0.0%	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%	0.0%	6.4%
4	2017	5.9%	13.6%	0.0%	0.0%	0.0%	0.0%	14.3%	0.0%	0.0%	9.1%	0.0%	0.0%	6.3%
5	2018	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	12.5%	0.0%	0.0%	0.0%	0.0%	0.0%	2.3%
6	2019	12.5%	3.7%	0.0%	20.0%	0.0%	0.0%	0.0%	0.0%	0.0%	66.7%	0.0%	0.0%	9.1%
7	2020	8.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	33.3%	0.0%	4.5%
8	2021	3.7%	33.3%	11.1%	0.0%	0.0%	0.0%	100.0%	25.0%	0.0%	20.0%	0.0%	3.8%	8.8%
9	2022	0.0%	0.0%	0.0%	0.0%	20.0%	0.0%	100.0%	66.7%	0.0%	0.0%	0.0%	0.0%	11.4%
10	2023	2.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%

- (a) PG&E updated its reporting tools and began reporting energized distribution wire down events starting in 2015 with 2016 being the first full year reporting these events.
- (b) For safety reasons, field personnel generally treat wire down events an energized if unknown and these percentages represent the information reported as actually being energized.
- (c) The data in this table is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.
- (d) Based on outages where the circuit was manually de-energized without securing in advance approval from CAISO (emergency force out).

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 26A**

**MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS**

**2014-2023**

***Transmission Patrols***

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	2016	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	2017	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	2018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	2019	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7	2020	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	2021	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.07%	0.00%	0.00%	0.00%	0.07%
9	2022	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	2023	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

(a) PG&E did not track this metric until 2015

**TABLE 26B**

**MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS**

**2014-2023**

***Transmission Inspections***

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	2016	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	2017	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	2018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	2019	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7	2020	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	2021	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	2022	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	2023	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

(a) PG&E did not track this metric until 2015

**TABLE 26C**  
**MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS**  
**2014-2023**

		<u><b>Distribution Patrols</b></u>												
Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	2016	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	2017	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	2018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	2019	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%
7	2020	0.00%	0.00%	0.00%	60%	31.66%	30.00%	14.40%	2.58%	2.04%	1.36%	0.07%	0.00%	8.61%
8	2021	0.00%	0.00%	0.00%	7.93%	7.72%	1.61%	0.18%	0.00%	0.00%	0.00%	0.00%	0.00%	0.86%
9	2022			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	2023			0.00%	66.57%	0.59%	1.67%	2.21%	0.00%	0.00%	0.00%	0.00%	0.00%	3.94%

(a) PG&E did not track this metric until 2015

**TABLE 26D**  
**MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS**  
**2014-2023**

		<u><b>Distribution Inspections</b></u>												
Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	2016	0.00%	0.00%	0.00%	0.22%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.03%
4	2017	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.42%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04%
5	2018	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	2019	0.00%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7	2020	0.00%	0.00%	0.00%	94.58%	69.47%	44.51%	20.07%	5.15%	0.53%	0.18%	0.14%	0.00%	9.01%
8	2021	0.00%	0.00%	0.00%	55.39%	29.02%	17.51%	0.77%	0.72%	0.04%	0.06%	0.00%	0.00%	4.10%
9	2022			0.00%	0.00%	0.00%	0.00%	0.00%	10.39%	2.89%	8.68%	24.44%	125.00%	0.03%
10	2023			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

(a) PG&E did not track this metric until 2015



**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 27**

**OVERHEAD CONDUCTOR SIZE IN HIGH FIRE THREAT DISTRICT, TIERS 2 AND 3, (HFTD)**

**2014-2023**

**Percentage of 6Cu in HFTD**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
2	2015													
3	2016													
4	2017													10.69%
5	2018													10.52%
6	2019													10.35%
7	2020													10.18%
8	2021													10.03%
9	2022													10.04%
10	2023													10.49%

(a) This is a new metric for PG&E to track, and EDGIS system capabilities only have annual data snapshots as far back as 2017 and we currently do not have the ability to display the results in a monthly manner.

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**TABLE 28A**  
**GAS OPERATION CORRECTIVE ACTIONS BACKLOG (ANNUAL)**  
**2014-2023**  
**GAS DISTRIBUTION**

Line No.	Year	Overdue Work Orders	Total Work orders	GAS OPERATIONS CORRECTIVE ACTIONS BACKLOG DISTRIBUTION (ANNUAL)
1	2014	8	6531	0.00
2	2015	74	7234	0.01
3	2016	2	7127	0.00
4	2017	22	4419	0.00
5	2018	48	4803	0.01
6	2019	37	24698	0.00
7	2020	74	11675	0.01
8	2021	324	13067	0.02
9	2022	44	20309	0.00
10	2023	2575	13397	0.19

**TABLE 28B**  
**GAS OPERATION CORRECTIVE ACTIONS BACKLOG (ANNUAL)**  
**2013-2022**  
**GAS TRANSMISSION**

Line No.	Year	Overdue Work Orders	Total Work orders	GAS OPERATIONS CORRECTIVE ACTIONS BACKLOG TRANSMISSION (ANNUAL)
1	2014	0	416	0.00
2	2015	17	404	0.04
3	2016	0	957	0.00
4	2017	0	518	0.00
5	2018	9	829	0.01
6	2019	10	559	0.02
7	2020	20	716	0.03
8	2021	32	977	0.03
9	2022	85	441	0.19
10	2023	4	304	0.01

Note: Monthly data not available.



**2023 SAFETY PERFORMANCE METRICS REPORT**  
**TABLE 30A**  
**GAS TRANSMISSION LARGE OVERPRESSURE EVENTS**  
**2014-2023**

**Number of Large OP Events**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	1	0	0	0	0	0	0	2	0	0	0	0	3
2	2015	0	0	0	0	0	0	1	1	0	0	0	0	2
3	2016	0	0	0	1	0	1	0	0	0	1	0	1	4
4	2017	0	0	0	2	1	0	0	1	0	3	0	0	7
5	2018	0	0	0	0	0	1	1	0	0	1	2	1	5
6	2019	0	0	0	1	1	1	1	1	0	0	1	1	7
7	2020	0	1	1	0	0	2	1	2	0	0	0	0	7
8	2021	0	0	0	0	0	1	1	0	0	0	0	1	2
9	2022	1	0	1	1	0	0	1	1	1	0	0	0	6
10	2023	0	0	2	0	1	0	0	0	0	0	0	0	3

**TABLE 30B**  
**GAS DISTRIBUTION LARGE OVERPRESSURE EVENTS**  
**2014-2023**

**Number of Large OP Events**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Large OP Events
1	2014	2	0	0	0	0	0	0	0	0	0	2	0	4
2	2015	1	0	1	0	0	0	0	1	0	0	0	0	3
3	2016	0	0	0	0	0	2	1	1	0	1	1	0	6
4	2017	1	0	0	0	0	1	1	0	1	1	0	0	4
5	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2019	1	0	0	0	0	2	0	0	0	2	1	0	4
7	2020	0	0	0	0	0	0	1	0	1	0	0	0	2
8	2021	0	0	0	0	1	0	0	0	0	1	1	0	3
9	2022	0	0	0	0	1	0	0	1	1	0	0	0	3
10	2023	0	0	0	1	1	0	0	0	0	0	0	0	2

**2023 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 31**

**GAS IN-LINE INSPECTIONS MISSED**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	0	0	0	0	0	0	0	0	0	0	0	0	0
2	2015	0	0	0	0	0	0	0	0	0	0	0	0	0
3	2016	0	0	0	0	0	0	0	0	0	0	0	0	0
4	2017	0	0	0	0	0	0	0	0	0	0	0	0	0
5	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2021	0	0	0	0	0	0	0	0	0	0	0	1	1
9	2022	0	0	0	0	0	1	0	0	0	0	0	0	1
10	2023	0	0	0	0	0	0	0	0	0	0	0	0	0

**2023 SAFETY PERFORMANCE METRICS REPORT  
TABLE 32  
OVERHEAD CONDUCTOR SAFETY INDEX (ANNUAL)**

**2014-2023**

**A) T&D Wire Down Events (non MED)**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	168	301	246	193	178	181	193	189	163	221	181	398	2612
2	2015	158	237	143	185	154	198	183	225	188	219	274	409	2573
3	2016	430	184	511	270	225	211	224	178	213	343	219	292	3300
4	2017	283	376	378	242	263	238	233	215	230	204	246	157	3065
5	2018	216	174	370	231	209	231	272	204	167	213	208	287	2782
6	2019	335	249	335	238	311	206	198	210	216	138	232	341	3009
7	2020	159	172	245	228	235	213	196	240	192	180	237	196	2493
8	2021	261	187	292	174	217	238	213	181	208	255	248	265	2739
9	2022	276	149	189	274	212	255	196	171	195	142	252	425	2736
10	2023	383	231	772	211	175	152	177	253	147	157	197	219	3074

**B) T&D Wire Down Events (non MED)/Total Circuit Miles**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	1.70	3.04	2.49	1.95	1.80	1.83	1.95	1.91	1.65	2.23	1.83	4.02	26.41
2	2015	1.60	2.40	1.45	1.87	1.56	2.00	1.85	2.28	1.90	2.21	2.77	4.14	26.02
3	2016	4.35	1.86	5.17	2.73	2.28	2.13	2.27	1.80	2.15	3.47	2.21	2.95	33.37
4	2017	2.86	3.80	3.82	2.45	2.66	2.41	2.36	2.17	2.33	2.06	2.49	1.59	31.00
5	2018	2.18	1.76	3.74	2.34	2.11	2.34	2.75	2.06	1.69	2.15	2.10	2.90	28.13
6	2019	3.39	2.52	3.39	2.41	3.15	2.08	2.00	2.12	2.18	1.40	2.35	3.45	30.43
7	2020	1.61	1.74	2.48	2.31	2.38	2.15	1.98	2.43	1.94	1.82	2.40	1.98	25.21
8	2021	2.64	1.89	2.95	1.76	2.19	2.41	2.15	1.83	2.10	2.58	2.51	2.68	27.70
9	2022	2.79	1.51	1.91	2.77	2.14	2.58	1.98	1.73	1.97	1.44	2.55	4.30	27.67
10	2023	3.89	2.35	7.84	2.14	1.78	1.54	1.80	2.57	1.49	1.60	2.00	2.22	31.23

(a) Table 32B performance has been corrected to align with the metric definition to multiple by 1000. This impacts all years and previously submitted 2021 and 2022 reports.

(b) The data in this table is subject to change based on continuing review of prior period outages. Any changes are reflected in PG&E's March 2024 report.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**2023 SAFETY PERFORMANCE METRICS REPORT**  
**ATTACHMENT B**  
**REPORT METRIC 22 – PUBLIC SIF SUBCATEGORIES**  
**PER SPD REQUEST**

**PACIFIC GAS AND ELECTRIC COMPANY  
2023 PUBLIC SERIOUS INJURIES and FATALITIES (SIFs)**

Event Date	Description	SPD Subcategories	Serious Injury	Fatality	Total Parties Involved
2/6/2023	Individual tripped on an underground electrical box	Other Non-Categorized Cause (slip and trip)	1	0	1
4/24/2023	Drowning at Bass Lake adjacent to Lupine Campground Day Use area.	Other Non-Categorized Cause (drowning)	0	1	1
5/8/2023	A waste management garbage truck contacted a live guy cable. An employee contacted the truck with a metal trash bin.	Individual contact with conductor	1	0	1
5/17/2023	A 3rd party individual was unloading a manlift when the boom contacted the overhead primary line.	Individual contact with conductor	0	1	1
5/22/2023	A third-party individual opened a pad mount transformer and experienced an electric shock.	Individual contact with conductor	1	0	1
5/28/2023	An individual jumped from the Miocene Head Dam and drowned	Other Non-Categorized Cause (drowning)	0	1	1
7/10/2023	Coworker at a stop sign, failed to yield the right of way to third-party motorcyclist prior to making a left turn.	Vehicle collision with utility facilities	1	0	1
7/13/2023	A contract partner truck was traveling northeast and encountered a sudden stop in traffic. The driver was unable to come to a complete stop and collided with a third-party passenger vehicle.	Vehicle collision with utility facilities	1	0	1
7/14/2023	PG&E coworker was traveling southbound when a 3rd Party vehicle traveling northbound cut across all lanes and a collision occurred.	Vehicle collision with utility facilities	0	1	1
8/10/2023	A third-party individual, not performing work for PG&E, was doing work on a customer's equipment when the boom contacted the overhead primary line.	Individual contact with conductor	0	1	1
8/16/2023	A third-party individual made contact with downed primary lines which resulted in a fatality in Mendota, Fresno County.	Individual contact with conductor	0	1	1
10/5/2023	The driver of a truck and backhoe trailer with backhoe was hit by a third-party vehicle	Vehicle collision with utility facilities	1	0	1
10/5/2023	An unhoused person attempted to cut into an energized line.	Individual contact with conductor	1	0	1
10/18/2023	Drowning on Pinecrest lake	Other Non-Categorized Cause (drowning)	0	1	1
10/24/2023	A third-party tree crew made contact with the primary lines.	Individual contact with conductor	1	0	1
11/4/2023	A car pole incident resulted in a downed wire and member of the public being taken to hospital by ambulance.	Vehicle collision with utility facilities	1	0	1
11/7/2023	Troubleshooter observed a drone stuck in a tree with a metal ladder and metal pole near the tree as well as a deceased person on the ground.	Individual contact with conductor	0	1	1