BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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

PACIFIC GAS AND ELECTRIC COMPANY'S (U39M) SAFETY AND OPERATIONAL METRICS REPORT (CORRECTIONS TO METRIC 3.11 AND 3.16)

(ATTACHMENT 1 SUPPORTING DOCUMENTATION FILED ON ARCHIVAL GRADE DVD)

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Dated: September 25, 2025

PACIFIC GAS AND ELECTRIC COMPANY'S (U39M)
SAFETY AND OPERATIONAL METRICS REPORT
(CORRECTIONS TO METRIC 3.11 AND 3.16)

(ATTACHMENT 1 SUPPORTING DOCUMENTATION FILED ON ARCHIVAL GRADE DVD)

Pacific Gas and Electric Company (PG&E) hereby submits these corrections to its semi-annual Safety and Operational Metrics (SOMs) Report filed April 1, 2025. The corrections are limited to errors in Metric 3.11 (GO-95 Corrective Actions in HFTDs) and 3.16 (Percentage of CPUC-Reportable Ignitions in HFTD Areas Transmission). The historical data for SOMs Metric 3.11 has been corrected. PG&E has provided the corrections, shown in red font, as Attachment 1.

Respectfully Submitted,

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PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT A

Metric 3.11 – GO-95 Corrective Actions in HFTDs

Metric 3.11 – Historical Data *(Filed on Archival Grade DVD due to format)*

Metric 3.16 – Percentage of CPUC-Reportable Ignitions in HFTD Areas Transmission

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.11

GO-95 CORRECTIVE ACTIONS IN HFTDS

CORRECTED SEPTEMBER 25, 2025

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.11
GO-95 CORRECTIVE ACTIONS IN HFTDS CORRECTED SEPTEMBER 25, 2025

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PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
CHAPTER 3.11
GO-95 CORRECTIVE ACTIONS IN HFTDS CORRECTED
SEPTEMBER 25, 2025

The material updates to this chapter, since the September 30, 2024 report, are identified in blue font.

A. (3.11) Overview

1. Metric Definition

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

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

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

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

2. Introduction to the Metric

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

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

2 GO 95 Rule 18, B1ai-aiii.

our Wildfire Risk, which are part of our 2020 Risk Assessment and Mitigation Phase Report filing. Vegetation Management (VM) work generally follows wildfire risk priorities. Priority notifications are tracked to completion against procedural timelines that are consistent with the underlying risk of the work.

3. Background

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

- Corrective Notifications Identified from Inspections: PG&E routinely inspects our electric assets using a variety of methods, including observations when performing work in the area, periodic patrols, and inspections, and targeted condition-based and/or diagnostic testing and monitoring. These inspections of our overhead and underground electric assets are designed to meet GO 165 requirements. Regarding our equipment inspections process, when an inspector identifies a maintenance condition, the inspector may immediately correct the condition (e.g., performs minor repair work) and records the correction or records the uncorrected condition, which is also reviewed by a centralized inspection review team (CIRT). This additional review performed by the CIRT is to drive consistency in inspection results by having a centralized team review all field findings prior to recording the finding as a tag.

If the condition is not immediately corrected, the inspector fills out the initial tag. The centralized review team approves and prioritizes the corrective notification tag in our Work Management system. These tags are prioritized based on the risk posed by the condition and urgency of repairs. We also inspect vegetation in the vicinity of our facilities and apply a similar process, described below.

Regarding Priority Level 2 electric notifications pertaining to our equipment inspections, we have subdivided Priority Level 2 into three

categories: Priority “X”, Priority “B” and Priority “E”. In 2024, PG&E introduced priority X tags for Level 2 extremely urgent conditions that pose a high potential to safety or reliability but does not pose an immediate risk. These conditions should not wait six months to be addressed similar to other Level 2 conditions and are scheduled to be addressed within seven days.

Priority “B” notifications are scheduled to be addressed within 6 months. Priority “E” are scheduled to be completed within 6 months for Tier 3 and 12 months for Tier 2.

- VM: Regarding our VM Programs, we routinely inspect clearances between our overhead electric assets and adjacent vegetation through a variety of methods, including observations during recurring patrols and targeted program inspections. These inspections are conducted by VM personnel and/or contractors and are designed to identify if tree work is required to meet or, in some cases, exceed GO 95 Rule 35 requirements and fire safety regulations that require a minimum clearance of 4 feet year-round for high-voltage power lines in the California Public Utilities Commission-designated HFTD areas. GO 95 Rule 35 also requires the removal of dead, diseased, defective, and dying trees that could fall into the lines.

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

Program. It is important to note that this data is classified into two categories: (1) Vegetation Dead and Dying and (2) Vegetation Priority 2, where each record reflects work completed on a tree.

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

  We recognize that our electric Priority "X" and Priority "B" notifications, which we consider having a higher likelihood of creating an equipment failure than other Level 2 Priority notifications, have a more aggressive timeline to address than GO 95 Rule 18 Priority Level 2. However, consistent with the safety and operational metric definitions provided in Decision 21-11-009, we are reporting our performance against the timelines set forth in GO 95 Rule 18 and can provide, upon request, additional information as to how we are performing against our more aggressive internal timelines for our electric Priority "X" and Priority "B" notifications. Furthermore, we are including all EC and LC notifications, as well as all inspection-identified vegetation safety hazards that meet the definition of GO 95 Rule 18 Level 2.

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

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

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

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

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

Line No.	GO 95 Rule 18	PG&E Priority	Description	GO 95 Rule 18 Timeline for Corrective Action	PG&E Internal Timeline for Corrective Action (Electric Notifications)	PG&E Internal Timeline for Corrective Action (Vegetation Tree Work)
5	Level 3	F (Electric)	Any risk of low potential impact to safety or reliability	Take corrective action within 60 months subject to the specific exceptions.[(a)]	1. Corrective actions to be addressed within five years from date condition is identified.	N/A

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

B. (3.11) Metric Performance

1. Historical Data (2020 – 2024)

We are reporting historical data from the years 2020 through 2024.

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

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

2. Data Collection Methodology

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

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

3. Metric Performance for the Reporting Period

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

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

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

Given the high volume (e.g., approximately 4x the volume from prior years) of identified electric distribution and transmission corrective notifications in the 2019 WSIP, we pivoted from managing our electric corrective notifications based on due date to focusing our priority through a wildfire risk informed approach. This means we would complete Level 1 and Level 2 Priority "X" and Priority "B" corrective notifications first and manage the inventory of Level 2 Priority "E" and Level 3 corrective notifications.

Our approach for managing the inventory of Level 2 Priority "E" is to: (1) group high concentrations of individual capital intensive rebuild corrective notifications into new, more comprehensive, System Hardening projects, and (2) permanently remove electric lines out of service that have multiple corrective notifications and serve small numbers of customers, where service can be provided via alternate line interconnections or remote grid solutions and (3) bundle and prioritize corrective work execution for those Level 2 Priority "E" notifications that were of high wildfire risk informed priority based on risk spend efficiency as indicated in WMP RN-04. PG&E address its distribution maintenance tag log more quickly through the isolation zone bundling approach described in PG&E's 2023-2025 Wildfire Mitigation Plan (WMP), which was approved by the Office of Energy Infrastructure Safety (Energy Safety) on December 29, 2023. EC notifications are bundled by isolation zone to maximize the number of notifications completed within a single outage and/or planned day of work. Isolation zones are circuit segments located between sectionalizing devices. A bundle consists of all open notifications within a given isolation zone. Bundles are created across all EC types (pole, non-pole capital, non-pole

expense). While PG&E's maintenance tag plan described in its 2023-2025 WMP will result in some lower-risk maintenance tags exceeding the current GO 95, Rule 18 timelines, the plan is prudent because it will allow PG&E to reduce the maintenance tag log more quickly and execute more tags with the same amount of resources while reducing the amount of clearances needed per unit executed.

In 2024 PG&E saw a performance of 67.9 percent as shown in Figure 3.11-1 below. This performance is below the 2024 one-year target of 69 percent.

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

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

FIGURE 3.11-1
GO 95 CORRECTIVE ACTIONS IN HFTDS – HISTORICAL PERFORMANCE (2020 – 2024)

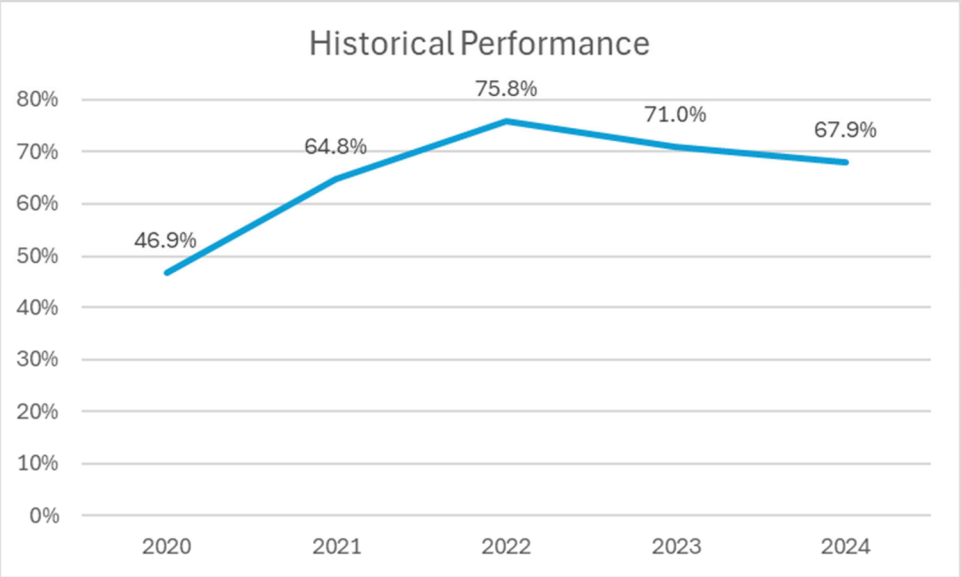

TABLE 3.11-2
GO 95 RULE 18 PRIORITY LEVEL 2 ACTUAL 2024
CORRECTIVE ACTIONS PERFORMANCE
(ELECTRIC DISTRIBUTION, ET AND VM)

Line No.	Year 2024	Level 2 Results
1	On Time	169,796
2	Past Due	80,283
3	% On Time	67.9%

TABLE 3.11-3
GO 95 RULE 18 LEVEL 2 ACTUAL 2024
CORRECTIVE ACTIONS PERFORMANCE
(ELECTRIC DISTRIBUTION ONLY)

Line No.	Year 2024	Level 2 Priority "E"	Level 2 Priority "B"	Level 2 Priority "B" From "E"	Level 2 Priority "X"	Level 2 Results
1	On Time	4,102	8,161	(358)	265	12,886
2	Past Due	74,660	589	723	0	75,972
3	% On Time	5.2%	93.3%	33.1%	100%	14.5%

TABLE 3.11-4
GO 95 RULE 18 LEVEL 2 ACTUAL 2024
CORRECTIVE ACTIONS PERFORMANCE
(ET ONLY)

Line No.	Year 2024	Level 2 Results
1	On Time	7,094
2	Past Due	3,305
3	% On Time	68.2%

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

TABLE 3.11-5
GO 95 RULE 18 LEVEL 2 ACTUAL 2024
CORRECTIVE ACTIONS PERFORMANCE
(VM)

Line No.	Year 2024	EVM Dead and Dying	Vegetation Dead and Dying	Vegetation Priority 2	Level 2 Results
1	On Time	6,177	97,479	46,160	149,816
2	Past Due	40	885	81	1,006
3	% On Time	99.4%	99.1%	99.8%	99.3%

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

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

The 1-year and 5-year targets have changed since the last SOMS filing.

2. Target Methodology

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

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

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

3. 2025 Target

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

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

Our distribution corrective notifications strategy will continue to focus on reducing wildfire risk associated with our open corrective notifications by working the highest risk spend efficiency bundles for Level 2 corrective notifications first versus managing corrective notification due dates. Using this approach in 2023 through 2024, we reduced the relative wildfire risk associated with backlog[3] open electric distribution corrective maintenance notifications in HFTD Tiers 2 and 3 by as much as 73.4 percent.

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

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

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

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

The following tables summarize PG&E's Year 2024 Target for Priority Level 2 notifications completed on time percentage, as well as a breakdown between the electric distribution, ET and VM Priority Level 2 notifications performance. Since the "B" priority will no longer be assigned to transmission notifications, as described above, transmission projections are not separated by "B" and "E" priority levels. Table 3.11-6 has been updated only to reflect Level 2 results due to the priority level changes in transmission.

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

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

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

Line No.	Year 2024	Level 2 Priority "E"	Level 2 Priority "B"	Level 2 Priority "B" From "E"	Level 2 Results
1	On Time	5,130	5,204	233	10,567
2	Past Due	46,169	3,286	2,150	51,605
3	% On Time	10%	61%	10%	17%

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

Line No.	Year 2024	Level 2 Results
1	On Time	6,820
2	Past Due	2,913
3	% On Time	70%

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

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

4. 2029 Target

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

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

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

Our distribution corrective notifications strategy will continue to focus on reducing the most wildfire risk associated with our open corrective notifications per dollar spent by working the highest risk bundles by isolation zone first versus managing corrective notification due dates. Furthermore, we are also revisiting opportunities to further align our distribution electric corrective action Priority levels (e.g., A, B, X, E, F, and H) with that of GO 95

Rule 18 (e.g., Levels 1, 2, and 3), which we expect will improve our performance in the long-term.

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

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

Line No.	Year 2029	Level 2 Results
1	On Time	192,934
2	Past Due	31,244
3	% On Time	86%

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

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

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

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

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

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

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

D. (3.11) Performance Against Target

1. Progress Towards 1-Year Target

As demonstrated in Figure 3.11-2 below, PG&E saw a performance of 67.9 percent in all of 2024, which fell below the Company's 1-year target of 69 percent. The root causes of lower performance are: (1) lower than expected on-time completions of Transmission corrective tags due to clearance constraints, emergency activations, and rescheduling conflicts, and (2) lower than expected on-time completions of VM work due to lower than expected find rates.

While the consolidated metric fell below target in 2024, Distribution saw an increase in on-time completions from 6k in 2023 to 13k in 2024, resulting in a greater reduction in wildfire risk and in the past due tags. Additionally, PG&E closed ~37 thousand more EC tags in 2024 compared to 2023. Furthermore, we began tracking priority B notifications across the system in greater detail to ensure that these higher risk EC notifications are included in our workplans, this has resulted in increased B tag on-time completion rate from 71 percent in 2023 to 93 percent in 2024.

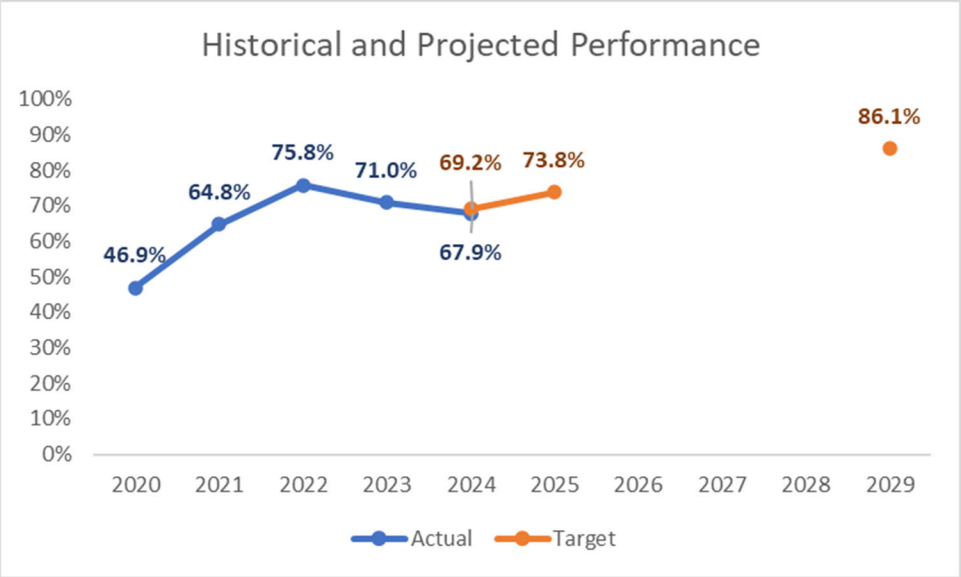
PG&E also made improvements to the inspection programs to increase effectiveness of identifying maintenance conditions that result in an asset failure. In 2024, PG&E analyzed the population of open tags and based on the engineering studies and a reassessment of failure modes, PG&E developed more objective criteria tied to failure for use during inspections and tag creation. Accordingly, PG&E streamlined its inspection checklists to

increase focus on identifying conditions on the five assets that are the most likely to lead to failures. These changes to inspections program in 2024 have allowed PG&E to reduce the creation of in-effective tags that have a lower risk of failure. While VM saw lower than expected completion volumes in 2024, VM exceeded their target of 98.2 percent by achieving an actual on-time rate of 99.3 percent.

2. Progress Towards the 5-Year Target

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

FIGURE 3.11-2
GO 95 CORRECTIVE ACTIONS IN HFTDS – HISTORICAL AND PROJECTED PERFORMANCE



E. (3.11) Current and Planned Work Activities

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

- System Hardening: System Hardening Program focuses on mitigating wildfire risk posed by distribution overhead assets in and near Tier 2 and 3 HFTDs in our service territory. This program targets high wildfire risk miles and applies various mitigation activities, including: (1) line removal, (2) conversion of distribution lines from overhead to underground, (3) application of Remote Grid alternatives, (4) mitigation of exposure

through relocation of overhead facilities, and (5) in-place overhead system hardening.

- Overhead Preventative Maintenance and Equipment Repair: Focuses on repair of electric equipment identified with corrective notifications. Our corrective notifications strategy will continue to focus on reducing wildfire risk associated with our open corrective notifications by working the highest risk Level 2 corrective notifications in a risk spend efficiency approach (bundling all open notifications by isolation zone and prioritizing by the most risk reduced per dollar spent starting in 2024) versus managing corrective notification due dates. We plan to accomplish this by continuing to complete Level 1 and Level 2 Priority "B" corrective notifications first and manage the inventory of Level 2 Priority "E" corrective notifications in a risk informed manner, where the highest risk spend efficiency isolation zone of bundled open notifications are targeted first, while deploying safety controls to manage the lower risk Level 2 Priority "E" corrective notifications. The approach allows strategic and targeted wildfire risk reductions, informed by customer impact and risk spend efficiencies, to continue to be our primary focus. PG&E will continue to utilize additional measures to ensure these past due notifications do not turn into realized risk by performing patrols, performing enhanced inspections like aerial and comprehensive pole inspections, and utilizing Enhanced Powerline Safety Settings and Public Safety Power Shutoff during heightened wildfire conditions. Overall, this combination of inspections, engineering containment and bundled execution continues to reduce the risk on PG&E's system.

PACIFIC GAS AND ELECTRIC COMPANY

SAFETY AND OPERATIONAL METRICS REPORT:

CHAPTER 3.16

PERCENTAGE OF CPUC-REPORTABLE IGNITIONS IN HFTD AREAS

(TRANSMISSION)

CORRECTED SEPTEMBER 25, 2025

PACIFIC GAS AND ELECTRIC COMPANY
SAFETY AND OPERATIONAL METRICS REPORT:
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SAFETY AND OPERATIONAL METRICS REPORT:
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PERCENTAGE OF CPUC-REPORTABLE IGNITIONS IN HFTD AREAS
(TRANSMISSION)
CORRECTED SEPTEMBER 25, 2025

The material updates to this chapter, since the September 30, 2024 report, are identified in blue font.

A. (3.16) Overview

1. Metric Definition

Safety and Operational Metrics (SOM) 3.16 – percentage of California Public Utilities Commission (CPUC)-Reportable Ignitions in High Fire Threat District (HFTD) Areas (Transmission) is defined as:

The number of CPUC-reportable ignitions involving overhead transmission circuits in HFTD divided by circuit miles of overhead transmission lines in HFTD multiplied by 1,000 miles (ignitions per 1,000 HFTD circuit mile).

A CPUC-reportable ignition refers to a fire incident where the following three criteria are met: (1) Ignition is associated with Pacific Gas and Electric Company (PG&E) electrical assets, (2) something other than PG&E facilities burned, and (3) the resulting fire travelled more than one linear meter from the ignition point.[1]

For this SOM, reporting is specific to Tier 2 and Tier 3 HFTDs.

PG&E provides the CPUC with annual ignition data in the Fire Incident Data Collection Plan, to the Office of Energy Infrastructure and Safety quarterly via quarterly GIS data reporting, in quarterly Wildfire Mitigation Plan (WMP) updates, and the Safety Performance Metrics Report.

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[1] Please see CPUC Decision (D.) 14-02-015, issued February 5, 2014 for additional details.

2. Introduction of Metric

The number of CPUC-reportable ignitions in HFTDs, normalized by circuit mileage, provides one way to gauge the level of wildfire risk that customers and communities are exposed to from overhead transmission assets. PG&E's objective is to minimize the number of CPUC-reportable ignitions in the right locations during the right conditions that may trigger a catastrophic wildfire.

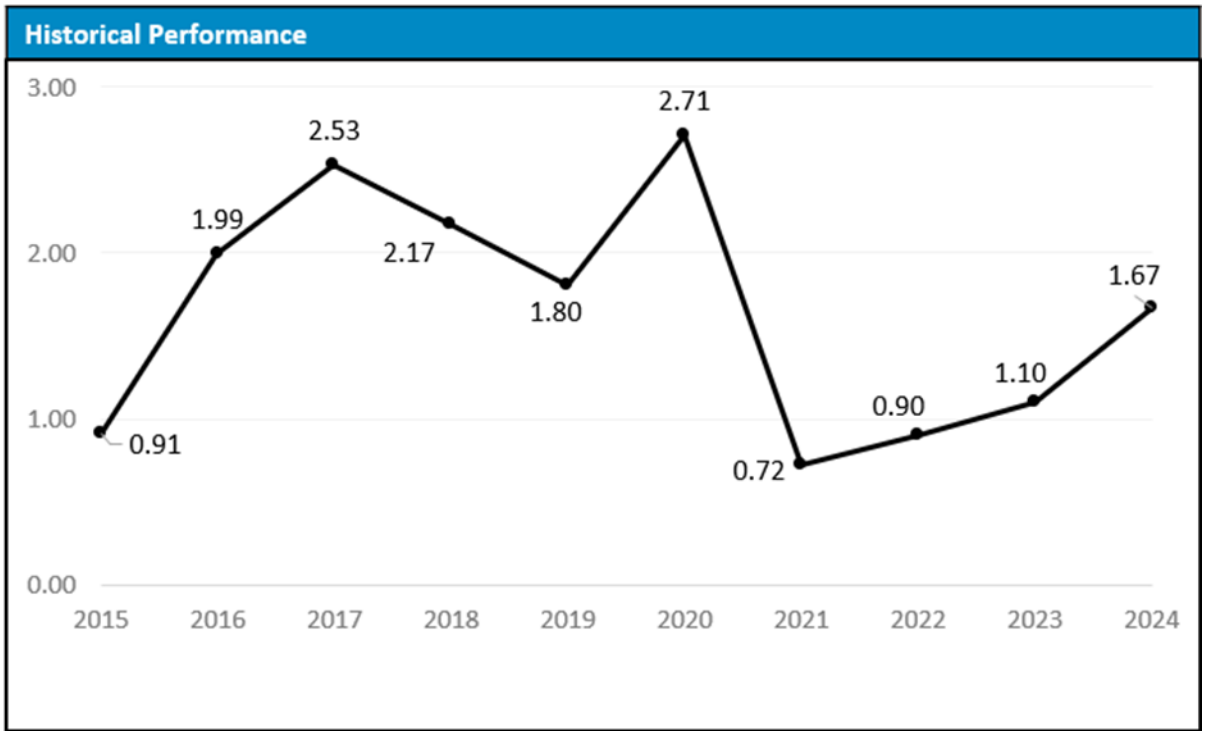
B. (3.16) Metric Performance

1. Historical Data (2015 – 2024)

PG&E implemented the Fire Incident Data Collection Plan, in response to CPUC D.14-02-015, in June 2014 and our record, the Ignitions Tracker, includes all CPUC-reportable ignitions from June 2014 to present. The 2014 data does not represent a complete year and is excluded in this analysis.

PG&E's overhead transmission circuits traverse approximately 5,400 miles of terrain in the HFTD areas where the overhead conductor is primarily bare wire, supported by structures consisting of poles and towers. The annual number of CPUC-reportable ignitions is too low and too variable to detect any statistical pattern.

FIGURE 3.16-1
HISTORICAL PERFORMANCE (2015 – 2024)



Note: As part of a Risk Assessment Improvement Plan item in PG&E's 2023 – 2025 WMP, PG&E reviewed historic ignitions data and reattributed certain historical events, resulting in slight changes in the count of ignitions in scope for this metric for historical years (some years increased while others decreased). In general, ignition counts represent a snapshot in time and are subject to change based on new data.

2. Data Collection Methodology

Data will be collected per PG&E's Fire Incident Data Collection Plan (Utility Standard/Procedure RISK-6306S/P). Results will be inclusive of unique HFTD CPUC-reportable ignitions attributable to the transmission asset class with overhead construction types.

The following ignition events captured by PG&E's Fire Incident Data Collection Plan (Utility Standard/Procedure RISK-6306S/P) will be excluded for this metric:

- Duplicate events;
- Ignitions that do not meet CPUC reporting criteria;
- Ignition events outside of Tier 2 and Tier 3 HFTD;
- Distribution Ignitions; and

- Ignitions attributable to underground or pad mounted assets, as these are not overhead assets. Ignitions caused by non-overhead assets in HFTD are rare and, as the fires are often contained to the asset, pose less of a wildfire risk.

The circuit mileage utilized to calculate the 2015-2022 performance of this metric originates from PG&E's Electrical Asset Data Reports, refreshed December 2022. The 2023-24 performance and targets are based on an updated sum of overhead circuit mileage, refreshed in 2023.

3. Metric Performance for the Reporting Period

Historically, reportable transmission ignitions in HFTD are low in volume with variability year to year, which complicates the detection of significant trends. PG&E observed nine CPUC reportable ignitions on overhead transmission assets through 2024 (corresponding to a rate of 1.67 ignitions per 1,000 circuit miles); one caused by bird guano on an insulator (contamination), one where the cause is unknown but suspected to have been avian related, five caused by confirmed bird contact, and two equipment failures.

C. (3.16) 1-Year Target and 5-Year Target

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

PG&E proposes to set the 2025 and 2029 upper limit of the target range to account for the previous 5 years of actual results and variability driven by weather, and external factors like seasonal bird migration.

2. Target Methodology

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

- Historical Data and Trends: PG&E has layered significant wildfire mitigation strategies over the past 8 years and, outside of PG&E's own ignition record, to help guide in target setting. PG&E is utilizing the previous 5-years worth of ignition actuals (2020-2024) to propose 2025 and 2029 target setting.
- Benchmarking: PG&E benchmarks extensively with other utilities in terms of wildfire risk and ignition reduction. Specifically, PG&E reviews

utility ignition trends (where available) and analyzes the risk associated large utility wildfires around the world;

- Regulatory Requirements: CPUC D.14-02-015;
- Appropriate/Sustainable Indicators for Enhanced Oversight and Enforcement: The targets for this metric are suitable for EOE as they consider the potential for an increase in severe weather events due to climate change; and
- Other Qualitative Considerations: The target range takes consideration for some variability in weather.

3. 2025 Target

PG&E's target for 2025 is 4-12 (corresponding to a rate of 0.74 – 2.23 ignitions per 1,000 circuit miles). The upper and bottom ends of this range represents the 5-year previous average (8 ignitions) subtracting/adding a full standard deviation (4 ignitions) for those same years to account for variability.[2]

4. 2029 Target

PG&E's target for 2029 is 4-12 (corresponding to a rate of 0.74 – 2.23 ignitions per 1,000 circuit miles). The upper and bottom ends of this range represents the 5-year previous average (8 ignitions) subtracting/adding a full standard deviation (4 ignitions) for those same years to account for variability. The upper end of the range stays at 12 in 2025 and 2029 because the volume of transmission ignitions is low, while variability year to year remains high.

D. (3.16) Performance Against Target

1. Progress Towards the 1-Year Target

As demonstrated in Figure 3.15 3 below, PG&E observed nine CPUC reportable ignitions on overhead transmission assets in 2024 (corresponding to a rate of 1.67 ignitions per 1,000 circuit miles), within our 2024 target range of 0 – 10 ignitions (corresponding to a rate of 0 – 1.85 ignitions per

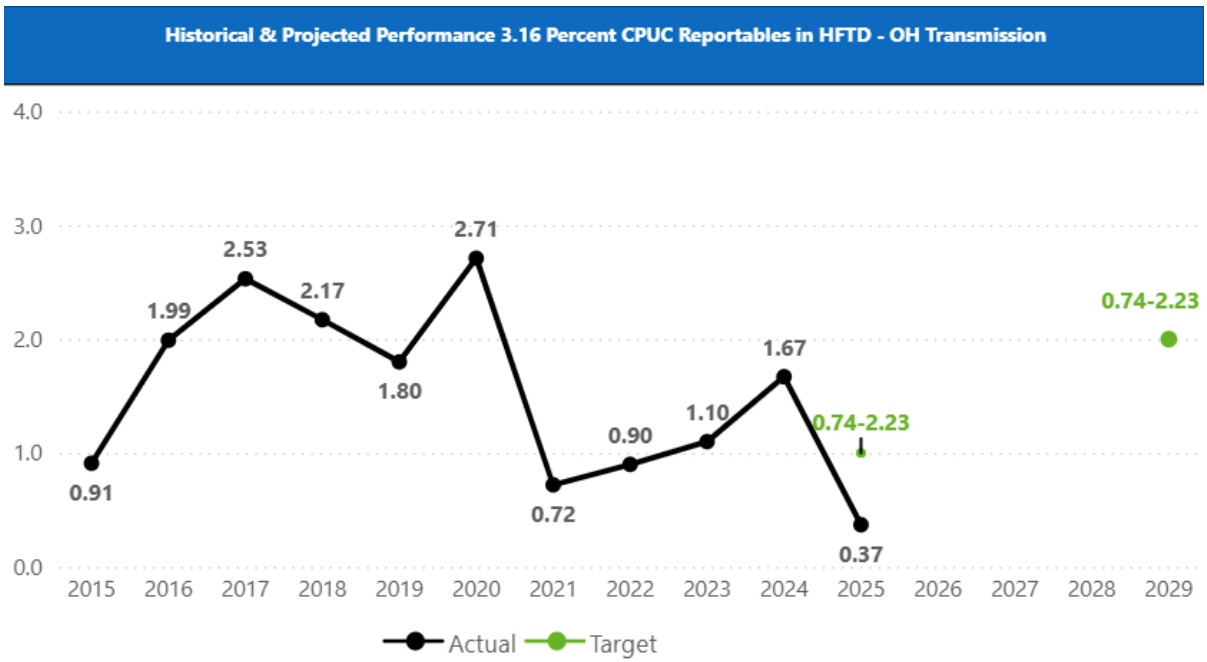
[2] The 2024 target has been corrected to reflect the 2023 mileage data for 2024 performance and target setting. PG&E inadvertently used 2022 mileage for the March report which resulted in a difference of 123 miles.

1,000 circuit miles). Most of the ignitions are confirmed or suspected to be avian related.

2. Progress Towards the 5-Year Target

As discussed in Section E below, PG&E is continuing to deploy several programs to keep metric performance within the Company's target range. PG&E expects no deviation from delivering the 2029 goal for this metric.

FIGURE 3.16-2
HISTORICAL PERFORMANCE (2015- 2024) AND TARGETS (2024, 2025 AND 2029)



Note: As part of a Risk Assessment Improvement Plan item in PG&E's 2023 – 2025 WMP, PG&E reviewed historic ignitions data and reattributed certain historical events, resulting in slight changes in the count of ignitions in scope for this metric for historical years (some years increased while others decreased). In general, ignition counts represent a snapshot in time and are subject to change based on new data.

E. (3.16) Current and Planned Work Activities

Through continual execution of its WMP, PG&E has taken action to reduce ignition risk associated with its transmission system, including:

- Utility Defensible Space Program: In 2023, PG&E expanded on Defensible Space Requirements in Public Resources Code Section 4292. Defensible Space is defined by three primary zones of clearance whereas in 2022 there

were two zones. Starting in 2023 the first zone (0-5 feet (ft.)) from energized equipment or building is referred to as Zone 0 or the "Ember – Resistant Zone" and is intended to be void of any combustibles. The second zone (5-30 ft.) surrounding energized equipment and building is called the "Clean Zone" and in most cases (with minimal exceptions) is clear of trees and most vegetation. The third and final zone of clearance (30-100 ft.) is the "Reduced Fuel Zone" where vegetation is permitted if it is reduced or thinned and maintained regularly and within the requirements listed within PG&E's hardening procedures.

  - Approximately 2,700 support structures were completed through this program in 2023 and 2024; and
  - PG&E is targeting an additional 665 support structures in 2024

  Please see Section 8.2.3.5, Substation Defensible Space (Mitigation) in PG&E's 2023-2025 WMP for additional details.

- Conductor Replacement and Removal: In 2021, PG&E completed 93.8 miles of conductor replacements and 10 miles of conductor removals. All this work took place on lines traversing HFTD areas. In 2022, PG&E removed or replaced 32 circuit miles of conductor in HFTD or High Fire Risk Area (HFRA). In 2023, PG&E removed or replaced 43 circuit miles of conductor in HFTD or HFRA. An additional 5 miles are planned through 2025.

  Please see Section 8.1.2.5.1, Traditional Overhead Hardening – Transmission Conductor in PG&E's 2023-2025 WMP for additional details.

- Conductor Splice Shunts: A conductor splice is a potential point of failure within a conductor span, due to factors such as corrosion, moisture intrusion, vibration, and workmanship variability. To reduce the risk of failure, PG&E had initiated a program to install a shunt splice on top of the existing splices on This installation eliminates the splice as a single point of failure, as a failure of the original splice would not result in down conductor. Lines prioritized for this program are based on higher risk splice and wildfire consequence. In 2023, 20 transmission lines had splice shunts installed. In 2024, 22 transmission lines had splice shunts installed. An additional 25 lines are planned through 2025.

Please see Section 8.1.2.5.1, Traditional Overhead Hardening – Transmission Conductor in PG&E's 2023-2025 WMP for additional details.

- Conductor Segment Replacements: Another program has been initiated to replace targeted conductor segments within a line. A transmission line may consist of multiple conductor types, including spans of higher-risk segments such as small-sized conductors. This program reduces risk for lines where the conductor segments are may be at higher risk, but the supporting structures are generally in good condition and there is no expected additional electrical capacity need to increase the conductor size. PG&E plans to complete segment replacements on 2 lines in HFTD/HFRA in 2025.

  Please see Section 8.1.2.5.1, Traditional Overhead Hardening – Transmission Conductor in PG&E's 2023-2025 WMP for additional details.

- Proactive Animal Abatement: Given that avian-caused ignitions are the top driver in recent years, PG&E is exploring two specific mitigations associated with reducing risk of avian related ignitions:
  - PG&E has designed dielectric covers to cover a portion of steel lattice towers where we have observed faults caused by avian contact. PG&E is committing to installing these devices at 22 towers in 2025 and conducting a feasibility study to inform future programs as part of a WMP initiative. Please see Qualitative commitment GH-13 Section 8.2.12 and 8.2.12.2 Other Technologies and Systems not Listed Above – Transmission in PG&E's 2026 2028 WMP for additional details; and
  - Executing an annual program to remove bird nests after nesting season. PG&E proactively removed 584 nests from transmission support structures in 2024.