

CONFIDENTIAL



PACIFIC GAS & ELECTRIC
NORTH STATE DISTRICT ATTORNEYS'
SAFETY MONITOR
FIRST ANNUAL COMPLIANCE REPORT

June 2, 2023



EXECUTIVE SUMMARY

Filsinger Energy Partners, Inc. (“FEP”) is engaged to serve as the North State DAs’ Safety Monitor (the “Monitor”) pursuant to the terms of the Plumas Superior Court Stipulated Final Judgment (the “Judgment”), filed April 11, 2022 (the “Effective Date”), by and among and Pacific Gas and Electric Company (“PG&E”) and Plumas County, Lassen County, Tehama County, Shasta County, and Butte County (collectively, the “North State Counties”), as well as that certain Retention Agreement for Sonoma Monitoring Services, dated as of the Effective Date, as amended on May 17, 2022, and August 25, 2022, between FEP and PG&E (the “Agreement”)¹. FEP will serve as the Monitor for a period of five years from the Effective Date (the “Effective Period”) plus any “Cure Periods” extending beyond the initial five years (the “Monitorship”). In this capacity, the Monitor has compiled this first Annual Compliance Report for the period from the Effective Date through April 10, 2023, the first year of the Monitorship.

The Monitor’s role, as described in the Judgment, is to monitor PG&E’s compliance with various commitments related to recovery from the 2021 Dixie Fire in the North State Counties and PG&E’s ongoing efforts to prevent wildfires in the future. To that end, the Monitor assesses PG&E’s compliance with its stated annual commitments and conducts quality assurance sampling reviews of PG&E inspections on its own electric transmission and electric distribution assets, as well as PG&E’s vegetation management patrols. PG&E’s failure to meet one or more of the “Performance Commitments” or “North State Counties’ Inspection Work Commitments” described in the Judgment results in a “Deficiency” as determined by the Monitor. When the Monitor determines the existence of a Deficiency, the Monitor and PG&E will follow the notice, meet and confer, and cure procedures set forth in the Judgment. The Monitor regularly communicates with PG&E and the District Attorneys for the North State Counties (collectively, the “North State DAs”) and sends all parties written notice of any Deficiencies identified by the Monitor. The Monitor also maintains a “Dashboard” to provide the parties with a visual representation of the location, type, and cure status of the various Deficiencies.

This Annual Compliance Report has been prepared by the Monitor for PG&E and the North State DAs, and includes the following items:

- Deficiency identification and reporting process;

¹ The Agreement also governs FEP’s role as the Sonoma County Safety Monitor pursuant to the terms of the Stipulated Final Judgment, dated April 11, 2022, in Case No. SCR745228-1 before the Superior Court of the State of California in and for the County of Sonoma, which arose from the 2019 Kincade Fire. While the Agreement governs both the North State Counties and Sonoma County monitorships, this Annual Compliance Report is focused on the North State Counties and a separate annual report will be issued by FEP in connection with its work on behalf of Sonoma County.



- Updates on PG&E's performance and progress towards meeting the Performance Commitments set forth in the Judgment;
- Updates on PG&E's performance and progress towards meeting the North State Counties' Inspection Work Commitments set forth in the Judgment, including its compliance with associated 2022 commitments under PG&E's 2022 Wildfire Mitigation Plan and internal procedures;
- Deficiencies identified by the Monitor during the first year of the Monitorship; and
- General considerations identified by the Monitor during the first year of the Monitorship.

The following table summarizes the Monitor's findings with respect to the Performance Commitments, the North State Counties' Inspection Work Commitments, and Deficiencies issued through the first year of the Monitorship.

Commitments	Findings from the 1 st Year of the Monitorship
<i>Jobs and Hiring</i>	PG&E confirms that it has incorporated the hiring commitments outlined in the Judgment into 2023 work and resource planning and hired 10 internal Vegetation Management inspector or vegetation operations inspector positions in 2022. PG&E indicates that it is on track to fulfill all commitments by the end of the Effective Period.
<i>Training</i>	The North State DA's confirm that PG&E has made all required training funding payments pursuant to the Judgment.
<i>All Sides Inspection Pilot Program</i>	PG&E confirms that it has completed the All Sides Inspection Pilot Program as described in the Judgment.
<i>Electric Transmission Asset Inspections</i>	PG&E confirms that 100% of the top 20% of risk ranked transmission structures in the Counties received both ground and aerial inspections during the 2022 work-year. The Monitor issued no Deficiencies resulting from reviews of Transmission Asset Inspections during the 2022 work year.
<i>Electric Distribution Asset Inspections</i>	PG&E confirms that all High Fire Threat District (HFTD) Tier 3 distribution structures in the North State Counties were inspected during work year 2022. PG&E confirms that each HFTD Tier 2 distribution structure in the North State Counties was inspected at least once in work years 2020, 2021, or 2022. PG&E has agreed to provide the Monitor with data substantiating compliance with this commitment within 30 days of the issuance of this Annual Compliance report. The Monitor issued 38 Deficiencies resulting from reviews of Distribution Asset Inspections during the first year of the Monitorship.
<i>Vegetation Management Inspections</i>	PG&E confirms that both routine vegetation management and tree mortality patrol inspections were conducted on all North State Counties distribution circuits in HFTD during the 2022 work year. PG&E has agreed to provide the Monitor with data substantiating compliance with this commitment within 30 days of the issuance of this Annual Compliance report. The Monitor issued 160 Deficiencies resulting from reviews of Vegetation Management Inspections during the first year of the Monitorship.



<i>Enhanced Powerline Safety Settings (EPSS)</i>	PG&E confirms that EPSS has been installed on all distribution circuits in HFTDs in the North State Counties by December 31, 2022. Within the North State Counties, 4,603 miles of electric distribution circuits are EPSS-capable.
<i>Undergrounding</i>	PG&E confirms that 115.9 miles of electric distribution lines have been undergrounded in the North State Counties by December 31, 2022, including 58.7 circuit miles as part of the Butte County Rebuild program in 2022.
<i>Public Safety Power Shutoff (PSPS)</i>	PG&E initiated one PSPS event during severe weather that took place between October 22-24, 2022, which the Monitor observed.

As provided in the Judgment, the Monitor will hold an “Annual Meeting” with PG&E, to which the North State DAs will be invited, to report on PG&E’s progress toward and compliance with the Performance Commitments and the North State Counties’ Inspection Work Commitments, including any anticipated Deficiencies identified to date, and provide a forum for PG&E and the North State DAs to discuss the Monitor’s updates. In accordance with the Judgment, the Monitor provides this Annual Compliance Report to PG&E and the North State DAs in advance of the Annual Meeting.²

² Whereas the Judgment calls for the Annual Compliance Report to be delivered no less than 30 days before the Annual Meeting, the parties are in the process of scheduling a mutually acceptable date for the Annual Meeting and may waive the 30-day requirement.



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INTRODUCTION

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

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

The Judgment emerges out of the Dixie Fire, a wildland fire that started in the Feather River Canyon on Tuesday, July 13, 2021. The Dixie Fire was ignited when a Douglas Fir fell onto the Bucks Creek 1101 12kV Overhead Distribution Line, which was owned and operated by PG&E. The conflagration burned for 104 days across 963,309 acres and five Counties before being fully contained on October 25, 2021. 1,973 wildland fire management personnel were deployed to fight the fire. One fatality was confirmed, and 1,311 structures were destroyed. The Dixie Fire stands as the largest recorded non-complex wildland fire in California history.

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

The Monitor is independent from PG&E and the North State Counties, as represented by the District Attorneys for the North State Counties (the “North State DAs”). The retention of the Monitor and the scope of the Monitor’s services were mutually agreed upon by PG&E and the North State DAs. The Performance Commitments and Inspection Work Commitments set forth in the Judgment apply specifically to the North State Counties. PG&E’s failure to meet one or more of the Performance Commitments or the Inspection Work Commitments at the time it is due, or a material failure by PG&E to perform the Inspection Work Commitments



during the Monitorship, results in a “Deficiency” as determined by the Monitor. When the Monitor determines the existence of a Deficiency, the Monitor and PG&E will follow the notice, meet and confer, and cure procedures set forth in the Judgment.

As this is the Monitor’s first Annual Compliance Report, the reporting period encompasses April 11, 2022, through April 10, 2023. As outlined in the Judgment, the Monitor will hold an Annual Meeting with PG&E, to which the North State DAs will be invited, to discuss this Annual Compliance Report and report on PG&E’s progress toward and compliance with the Performance Commitments and the Inspection Work Commitments.



DEFICIENCY IDENTIFICATION AND REPORTING

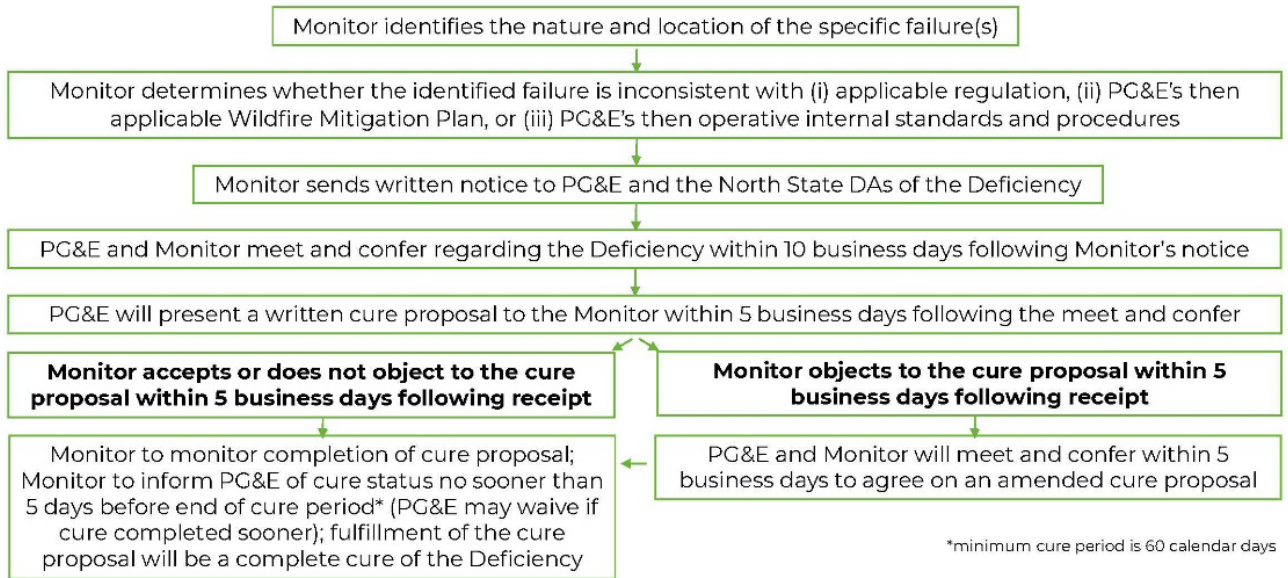
PG&E's failure to meet one or more of the Performance Commitments or the Inspection Work Commitments at the time it is due, or a material failure by PG&E to perform the Inspection Work Commitments during the Monitorship, results in a "Deficiency" as determined by the Monitor. For purposes of determining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

To determine the existence of a Deficiency, the Monitor analyzes whether the potential failure violates PG&E's commitment or obligation under (i) applicable regulation, (ii) PG&E's then applicable Wildfire Mitigation Plan ("WMP")³, or (iii) PG&E's then operative internal standards and procedures. If the Monitor determines that a violation has occurred, the Monitor provides written notice of the Deficiency to PG&E and the North State DAs. PG&E and the Monitor then meet and confer regarding the Deficiency within ten business days following the Monitor's written notice. PG&E then prepares and presents a written cure proposal to the Monitor within five business days following the meet and confer. After receipt of the written cure proposal, the Monitor can either accept or object to the cure proposal within five business days. If the Monitor accepts the cure proposal, the Monitor will confirm completion of the proposed cure by the agreed-upon cure deadline, and fulfillment of that cure proposal constitutes a complete cure of the Deficiency. If the Monitor objects to the cure proposal, PG&E and the Monitor will meet and confer again within five days of the objection to agree upon an amended cure proposal. The following flow chart depicts the aforementioned process.

³ The applicable WMP for the first year of the Monitorship is the 2022 Wildfire Mitigation Plan Update – Revised, filed with the Office of Energy Infrastructure Safety on July 26, 2022 (the "2022 WMP").



Meet and Confer / Cure Process







“PG&E has been tracking this commitment internally and is on track to fulfill this commitment by the end of the Effective Period. For example, PG&E has incorporated hiring commitments into 2023 work and resource planning as well as tracking progress against baseline on hiring commitments. In addition, PG&E has engaged in discussions with the [International Brotherhood of Electrical Workers] about posting new internal positions in the areas of systems inspections and vegetation management, which would include, but not be limited to, positions in the North State Counties.”

On May 16, 2023, PG&E updated their response to the Monitor’s status inquiry as follows:

“PG&E has been incorporating hiring commitments into work and resource planning and is continuing to do so for future year work and resource planning.

In the area of Systems Inspection within the North State Counties, PG&E currently has posted internal inspector positions which are moving through PG&E’s internal bidding process. These additional positions will need to go through an internal bidding process before they are eligible for external hire.

PG&E is also actively reviewing potential new System Inspection classifications involving patrollers, with only Qualified Electrical Worker (QEW) knowledge requirements.

In the area of Vegetation Management, PG&E has added approximately 10 internal vegetation management inspector and/or vegetation operations inspector (tree crew oversight) positions in the North State Counties in the last year, and is planning to increase internal VM staffing in the North State Counties further in 2023. Internal staffing projections for the North State Counties for 2023 are still going through PG&E’s internal leadership approval and have not yet been finalized.

Please note information provided is based on PG&E’s standard HR reports which in turn represent HR headcounts on a particular day. For example, headcount could change day-over-day depending on attrition and new hires.”

Performance Commitment 4 (Training)

Judgment Commitment

PG&E will provide funding to community colleges, in the amounts and on the timeline set out in the Monetary Relief Section, below, to fund one or more of the following:

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



- reasonable business judgment determines; and/or
- vi. The development and/or enrichment of certificate and degree programs in topics covering ecosystem restoration and applied fire management to allow students to be trained to respond to, and help prevent catastrophic wildfires.

Commitment Analysis

With respect to Performance Commitment 4, the North State DAs confirmed by signature on a document provided by PG&E to the Monitor that PG&E has timely made all required payments pursuant to Performance Commitment 4.

Performance Commitment 4 is complete.

Performance Commitment 5 (Inspection Pilot Program)

Judgment Commitment

Through 2022, PG&E will run a pilot program on a process to perform visual assessment on all sides of potential strike trees on designated routine distribution vegetation management patrols in High Fire Threat Districts in one or more of the North State Counties. In 2023, PG&E will implement a process to perform visual assessment on all sides of potential strike trees on designated routine distribution vegetation management patrols in HFTD overhead electric distribution miles in the North State Counties; this process will be informed by the 2022 pilot program.

Commitment Analysis

With respect to Performance Commitment 5, PG&E responded on November 4, 2022, to the Monitor's status inquiry as follows:

"The 2022 pilot program on a process to perform visual assessment on all sides of potential strike trees on designated routine distribution management patrol in HFTDs within the North State Counties referenced in Performance Commitment 5 has been completed. PG&E is assessing our current VM programs along with the results of the pilot and is developing holistic risk mitigation plans for 2023, including whether and the extent to which a visual assessment on all sides of potential strike trees will be continued in 2023; these plans will be set out in the Company's 2023 Wildfire Mitigation Plan."

PG&E provided the following updated status response on March 3, 2023:

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

The Monitor has participated in presentations and interviews with PG&E regarding the Inspection Pilot Program (the "All Sides Pilot") over recent weeks. PG&E has indicated that the All Sides Pilot took place between December 2021 and April of 2022 across 15 distribution vegetation management ("VM") projects in HFTD service areas representing



approximately 285 line miles across approximately 3,400 VM locations, including locations in Plumas and Butte Counties. The project required PG&E VM inspectors to perform a visual assessment of all sides of potential strike trees during VM patrols and use a checklist of eleven criteria to prescribe tree work. An affirmative answer to any of these criteria would result in an automatic prescription for removal.

In the above-mentioned presentations given after the completion of the All Sides Pilot, PG&E indicated that the exercise yielded several findings, including but not limited to the following:

- i. The All Sides Pilot yielded a ninefold increase in the number of trees prescribed for removal, as compared to the inspection standards used under Routine VM patrols.
- ii. The outcomes of the All Sides Pilot are comparable to the Enhanced Vegetation Management (“EVM”) program⁴, which was discontinued at the end of 2022, in terms of ignition risk reduction and the volume of tree removals prescribed. PG&E believes that both programs over-rotate to removals and reduce ignition risk by approximately 5%.
- iii. The use of the All Sides Pilot inspection methodology would be difficult to implement operationally across PG&E’s service territory. Notably, the inspection methodology and checklist were not easily adopted by inspectors, who were more familiar with the implementation of International Society of Arboriculture (“ISA”) standards.
- iv. Enhanced Powerline Safety Settings (“EPSS”), which are discussed in greater detail below, have proven much more effective at ignition reduction than the All Sides Pilot and the EVM program.⁵

PG&E does not intend to implement the All Sides Pilot program across the company's entire service area. Rather, PG&E has informed the Monitor that it will be conducting a new pilot program starting in Q2 2023 to conduct Focused Tree Inspections (“FTI”) in “Areas of Concern”, a process that involves performing an additional patrol on certain of PG&E's highest wildfire risk circuits identified through predictive and risk modeling. The FTIs include a “100% QC” process that will be conducted by ISA certified arborists with Tree Risk Assessment Qualification (“TRAQ”) training. PG&E has indicated that the FTI program will incorporate a “Level 2” (i.e., all sides) review of certain trees. The Monitor has requested additional detailed information regarding the FTI pilot program and intends to monitor the program's implementation.

⁴ The EVM program, which applied to a portion of PG&E’s distribution circuits each year, expanded radial and overhang clearance and evaluated potential strike trees using PG&E’s Tree Assessment Tool, which exceeded regulatory requirements for distribution circuits. Judgment, page 16.

⁵ EPSS is not mutually exclusive with the All Sides Pilot or EVM.



Status of Performance Commitments

During the first year of the Monitorship, PG&E has complied with all Performance Commitment deadlines relating to (i) funding requirements and (ii) program implementation, and the Monitor has not issued any Deficiencies relating to Performance Commitments.



INSPECTION WORK COMMITMENTS

This section addresses PG&E's performance and progress towards meeting the Inspection Work Commitments for the year under review. The six Inspection Work Commitments relate to the following areas of PG&E's operations: electric transmission asset inspections, electric distribution asset inspections, VM inspections, EPSS, electric distribution asset undergrounding, and Public Safety Power Shutoff. Each Inspection Work Commitment presented in this section begins with the corresponding commitment language from the Judgment, followed by any additional related commitments set forth in the 2022 WMP or PG&E's internal standards and procedures, followed by the Monitor's analysis of PG&E's progress toward or compliance with the commitments. For the inspection related commitments, each sub-section concludes with a description of the Monitor's quality assurance sampling reviews of PG&E's inspections and a discussion of Deficiencies issued in connection therewith for reviews conducted during the first year of the Monitorship.



Inspection Work Commitment (Electric Transmission Inspections)

Judgment Commitment

PG&E shall conduct Enhanced Equipment Inspections⁶ (and any associated repairs or corrective work as identified and prioritized on the then-operative annual risk- informed work plans) on electric transmission assets located in the North State Counties, pursuant to the then-applicable WMP and annual work plans; for 2022, this includes using at least two detailed inspection methods per structure per year: ground and aerial. PG&E shall submit annual plans for the safety inspections of those assets in the North State Counties to the North State DAs' Safety Monitor for review and feedback, and the North State DAs' Safety Monitor will use these annual plans to help fulfill its monitoring duties as set out in this Judgment.

2022 WMP Commitment

100% of all [transmission] structures in the top 20% will be inspected.⁷

Commitments Analysis:

PG&E reported to the Monitor that 100% of its electric transmission structures in HFTD and High Fire Risk Areas (“HFRA”) in the North State Counties that were inspected during 2022 received both ground and aerial inspections.⁸

Table 1. PG&E Transmission Assets - 2022 HFTD/HFRA

Project	Ground Inspection Completed	Aerial Inspection Completed	Percentage Complete
North State Counties	10,309	10,309	100%

PG&E also reported that it achieved its commitment to conduct Enhanced Equipment Inspections on 100% of all transmission structures in the North State Counties in the top 20% of systemwide wildfire risk based on PG&E risk scoring.

Table 2. PG&E Transmission Assets - Top 20% of Wildfire Risk

Project	Ground Inspection Completed	Aerial Inspection Completed	Percentage Complete
North State Counties	32	32	100%

⁶ PG&E conducts enhanced inspections for electric transmission assets in HFTDs and HFRA's using at least two detailed inspection methods per year: ground and aerial (“Enhanced Equipment Inspections”). Judgment, page 15.

⁷ 2022 WMP, Table PG&E-5.3.1(A). Commitment applies to the Top 20% of wildfire risk based on PG&E risk scoring.

⁸ Population limited to structures in service for full-year 2022.



Transmission Inspection Reviews

Enhanced inspections of overhead transmission assets seek to proactively identify and treat pending failures of asset components which could create a fire ignition if left unresolved or allowed to “run to failure.” Enhanced inspections, defined as Enhanced Equipment Inspections in the Judgment, involve at least two detailed inspection methods per structure: ground and aerial. These inspection methods involve visual examinations of the assets with the use of inspection checklists. Aerial inspections may be completed either by drone, helicopter, or aerial lift. HFTD and HFRA transmission structures are inspected more frequently than the 3-year base inspection cycle with structures selected for prioritization annually based on wildfire risk, wildfire consequence, and other considerations such as inspection trends.⁹

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

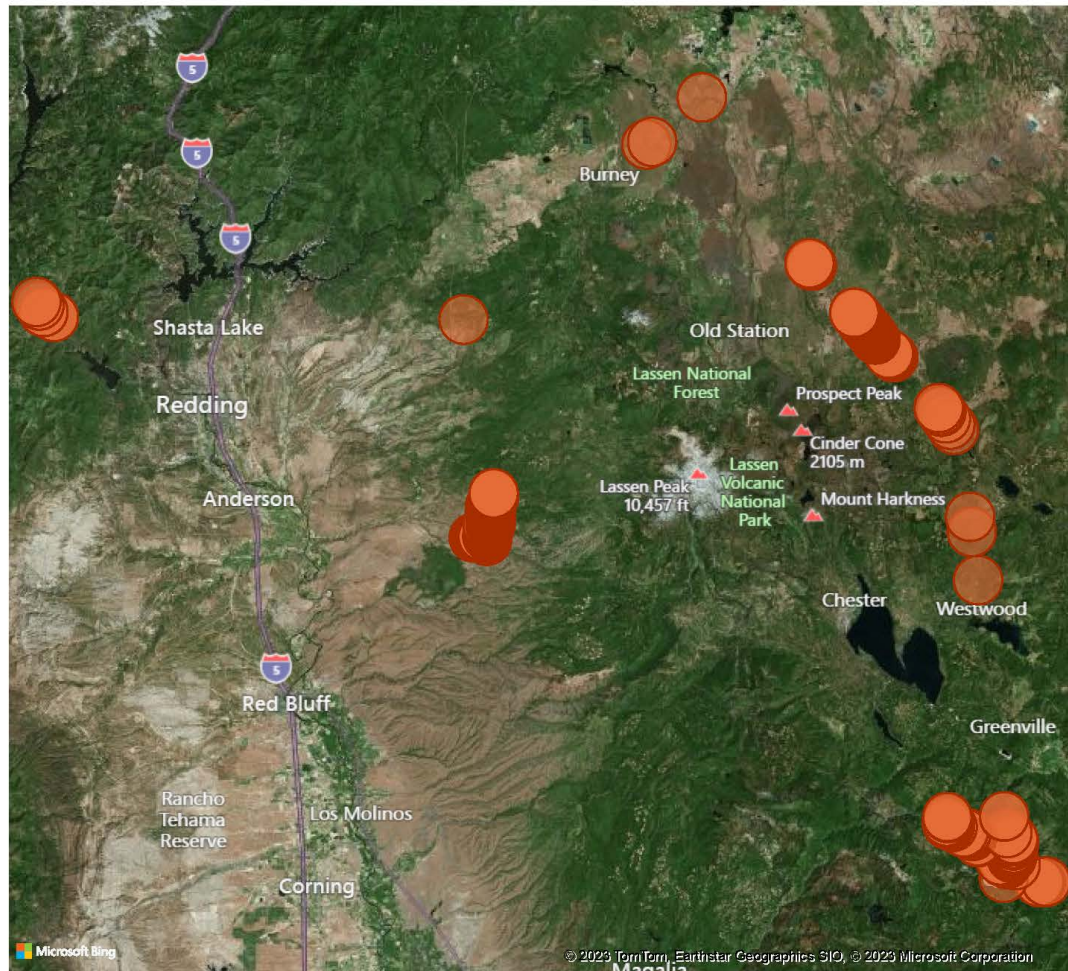
During the first year of the Monitorship, the Monitor reviewed PG&E inspections of 275 transmission assets in the North State Counties. The Monitor’s reviews of PG&E’s electric transmission asset inspections have not identified any Deficiencies for reviews conducted during the first year of the Monitorship. The following graphic from the Monitor’s Dashboard shows the locations of the transmission assets reviewed during the first year of the Monitorship and related data.

⁹ 2022 WMP, page 618-619.



NORTH STATE COUNTIES - TRANSMISSION DASHBOARD

PG&E Inspected Transmission Assets Reviewed by Monitor During First Year of Monitorship.
Inspection Review Locations Identified in Orange.



Total PG&E Inspected
Transmission Assets
Reviewed by Monitor

275

Percentage of Monitor
Reviewed Transmission
Assets with Deficiency

0%



Inspection Work Commitment (Electric Distribution Inspections)

Judgment Commitment

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

2022 WMP Commitment

Overhead electric distribution structures in Tier 3 areas are inspected annually. Overhead electric distribution structures in Tier 2 HFTD areas are inspected every three years.¹⁰

Commitments Analysis:

With respect to the Electric Distribution Inspection Work Commitment, PG&E provided the following statement on May 30, 2023:

"Pursuant to the North State and Sonoma judgments, PG&E has completed 100% of tier 3 electric distribution inspections, and the remaining portion of tier 2 electric distribution inspections in 2022. The data provided encompasses PG&E's service territory, which includes the 6 counties (Butte, Lassen, Plumas, Shasta, Sonoma, Tehama) referenced in the judgment."

As of the issuance of this first Annual Compliance Report, the data provided by PG&E are insufficient to corroborate the above statement. The Monitor did not determine that PG&E failed to comply with the Electric Distribution Inspection Work Commitment; rather, the data provided to the Monitor was insufficient to confirm compliance and additional data would be required to do so.

PG&E has agreed to provide the Monitor with data substantiating compliance with the Electric Distribution Inspection Work Commitment within 30 days following the issuance of this report. Failure to provide substantiating data within the 30-day period will result in a Deficiency.

Distribution Inspection Reviews

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

¹⁰ 2022 WMP, page 614. PG&E's Utility Standard: TD-8124S Detailed System Inspections Framework, page 3, Table 2 sets forth the same inspection cycle requirements as the 2022 WMP.



checklist and collect digital records and photo documentation regarding the condition of distribution assets during inspections from a ground vantage point.¹¹

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

During the first year of the Monitorship, the Monitor conducted quality assurance reviews of PG&E inspections of 4,591 distribution assets in the North State Counties, which identified 38 Deficiencies.¹² As of May 24, 2023, 3 of such distribution asset inspection Deficiencies were pending a cure proposal agreed upon between the Monitor and PG&E, 14 were pending cure, 9 were cured, and 12 were remediated in the ordinary course of PG&E's inspection programs. The following graphics show the locations of the distribution assets reviewed by the Monitor during the first year of the Monitorship and related data, as well as the location and type of Deficiencies identified by the Monitor in connection with such reviews.

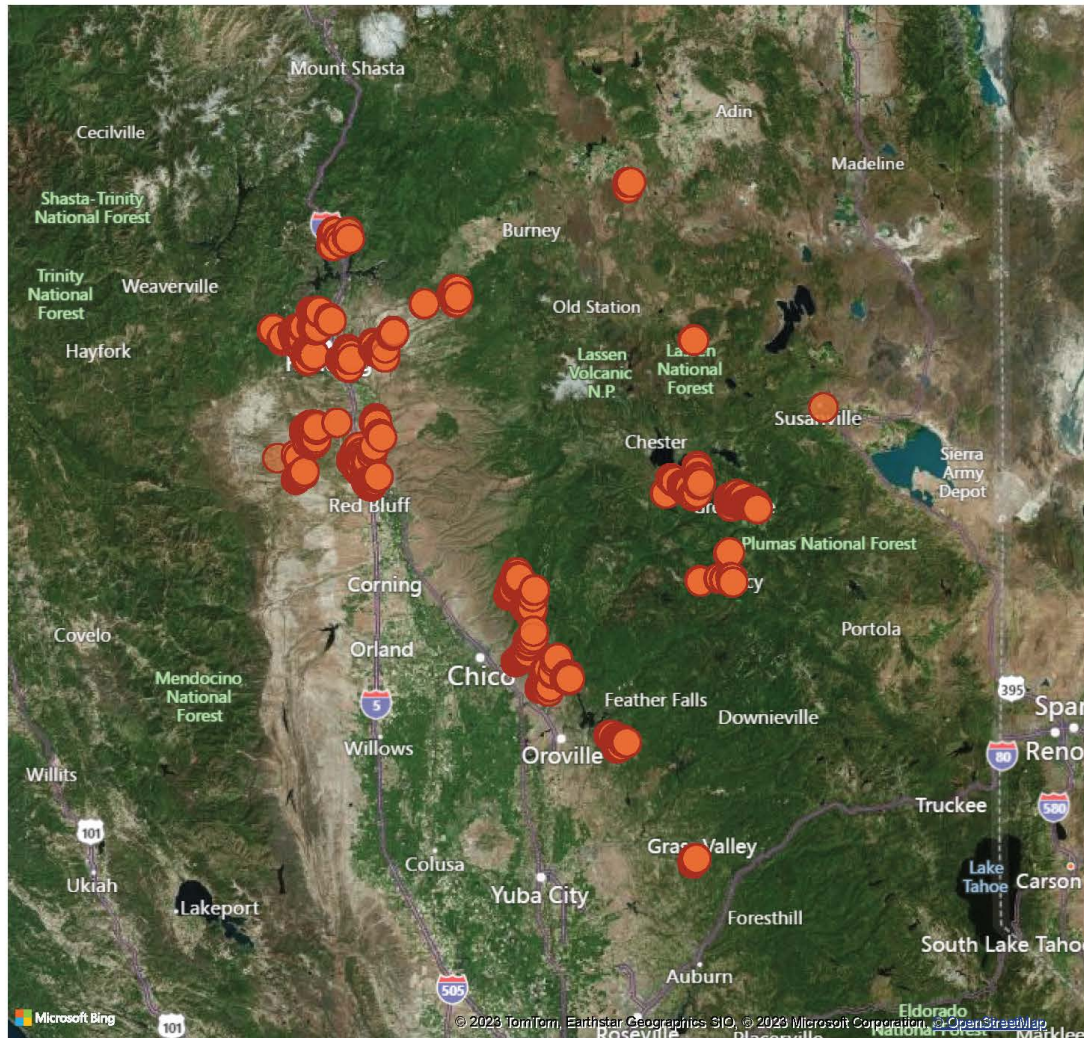
¹¹ 2022 WMP, page 613.

¹² Excludes one Deficiency notice that was retracted by the Monitor following the meet and confer with PG&E.



NORTH STATE COUNTIES - DISTRIBUTION DASHBOARD

PG&E Inspected Distribution Assets Reviewed by Monitor During First Year of Monitorship.
Inspection Review Locations Identified in Orange.



Total PG&E Inspected
Distribution Assets
Reviewed by Monitor

4591

Distribution Inspection
Review Days by Monitor

138

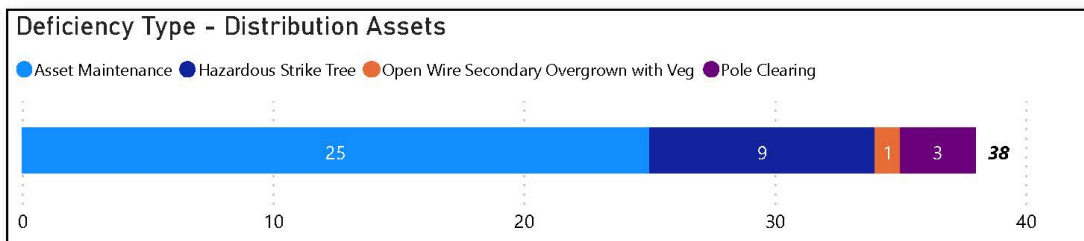
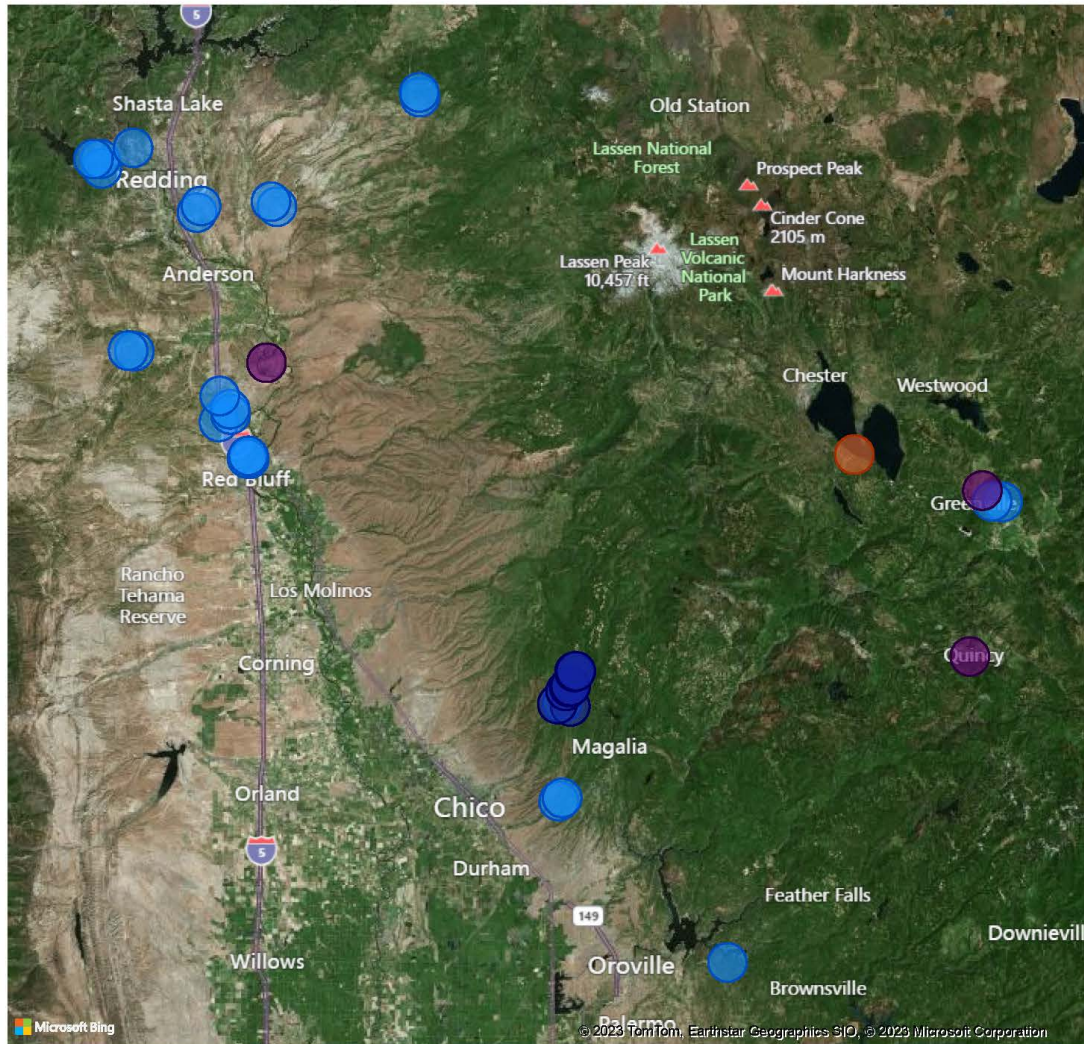
Percentage of Monitor
Reviewed Distribution
Assets with Deficiency

0.8%



NORTH STATE COUNTIES - DISTRIBUTION DASHBOARD

Distribution Asset Deficiency Locations.





Inspection Work Commitment (Vegetation Management Patrols)

Judgment Commitment

PG&E shall conduct Vegetation Management Patrols¹³ (and associated tree work and removals as identified and prioritized on the then-operative annual risk-informed work plans) on the distribution circuits in the HFTDs in the North State Counties, pursuant to the then-applicable WMP and annual work plans. Such inspections and associated work crews for each circuit are scheduled annually to allow for the allocation and scheduling of the required resources. Such annual plans for the North State Counties will be provided to the North State DAs' Safety Monitor for review and feedback, and the North State DAs' Safety Monitor will use these plans to help fulfill its monitoring duties set out in the Judgment.

PG&E Internal Standards and Procedures Commitment

Routine VM inspections are required to be conducted annually on all overhead primary and secondary distribution facilities.¹⁴ Tree mortality patrols are required to be conducted within HFTD once per year, approximately 6 months after routine patrol inspection of the circuit.¹⁵

Commitments Analysis

With respect to the Vegetation Management Inspection Work Commitment, PG&E provided the following statement on May 31, 2023:

"Pursuant to the North State and Sonoma judgments, in 2022 PG&E has completed Routine and Second Patrol inspections within all HFTDs throughout the service territory, which includes the 6 counties (Butte, Lassen, Plumas, Shasta, Sonoma, Tehama) referenced in the judgment."

As of the issuance of this first Annual Compliance Report, the data provided by PG&E are insufficient to corroborate the above statement. The Monitor did not determine that PG&E failed to comply with the Vegetation Management Inspection Work Commitment; rather, the data provided to the Monitor was insufficient to confirm compliance and additional data would be required to do so.

PG&E has agreed to provide the Monitor with data substantiating compliance with the Vegetation Management Inspection Work Commitment within 30 days following the issuance of this report. Failure to provide substantiating data within the 30-day period will result in a Deficiency.

Vegetation Management Inspection Reviews

The "Routine" electric distribution VM program performs annual inspections on all overhead

¹³ The primary routine vegetation management inspections and the tree mortality patrols for distribution circuits in HFTDs are hereafter referred to as "Vegetation Management Patrols". Judgment, page 16.

¹⁴ Utility Standard: TD-7102S Distribution Vegetation Management Standard (DVMS), page 2.

¹⁵ Utility Procedure: TD-7102P-23 Vegetation Management Second Patrol Procedure, page 4.



primary and secondary distribution facilities to maintain radial clearance between vegetation and conductors by identifying trees that will encroach within the minimum distance requirements as required by law and/or PG&E procedures. In addition, trees that are dead, show signs of disease, decay or ground or root disturbance, which may fall into or otherwise impact the conductors before the next inspection cycle ("Hazard Trees")¹⁶ are identified and mitigated. The VM Tree Mortality Patrol program performs scheduled Tree Mortality Patrols¹⁷ approximately six months before or after the Routine patrol on overhead primary and secondary distribution facilities, primarily within HFTD and State Responsibility Areas/Federal Responsibility Areas, to maintain radial clearance between vegetation and conductors by identifying trees that will encroach within the minimum distance requirements required by law and/or PG&E procedures and by identifying Hazard Trees.¹⁸ PG&E also conducted EVM inspections during 2022, which expanded radial and overhang clearances beyond regulatory requirements and evaluated potential Hazard Trees using PG&E's Tree Assessment Tool, for certain distribution lines based on a risk ranking prioritization model.

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

During the first year of the Monitorship, the Monitor conducted VM inspection reviews across approximately 608 miles in the North State Counties. These inspection reviews identified 160 Deficiencies.¹⁹ As of May 24, 2023, 82 of such VM inspection Deficiencies were pending a cure proposal agreed upon between the Monitor and PG&E, 16 were pending cure, 43 were cured, and 19 were remediated in the ordinary course of PG&E's inspection programs. The following graphics show the starting locations of the Monitor's VM inspection reviews during the first year of the Monitorship and related data, as well as the location and type of Deficiencies identified by the Monitor in connection with such reviews.

¹⁶ Utility Standard: TD-7102S, Distribution Vegetation Management Standard (DVMS), Publication Date: 09/04/2015 Rev: 1, page 14.

¹⁷ Also known as second patrols or CEMA patrols.

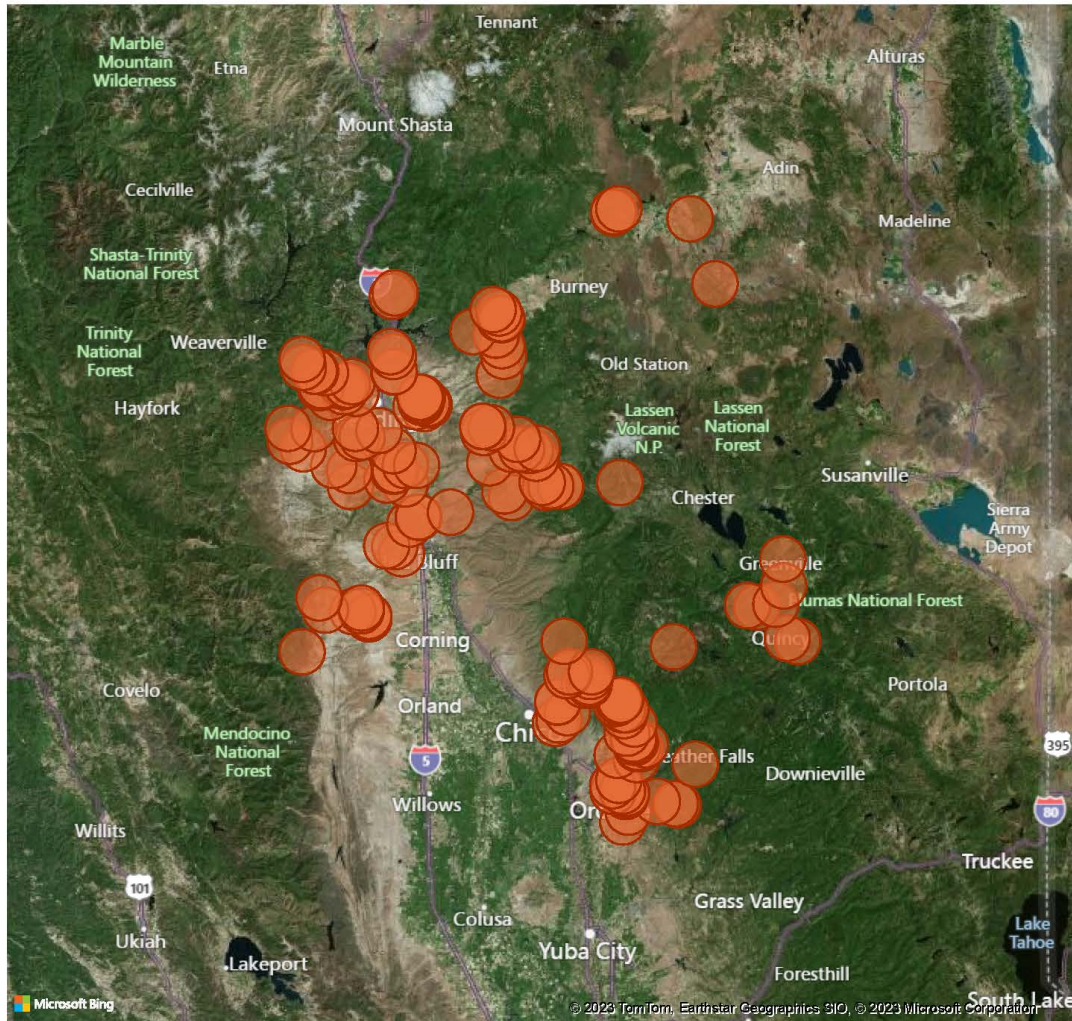
¹⁸ 2022 WMP, page 725.

¹⁹ Excludes seven Deficiency notices that were retracted by the Monitor following the meet and confer with PG&E.



NORTH STATE COUNTIES - VM DASHBOARD

PG&E VM Inspections Reviewed by Monitor During First Year of Monitorship. Inspection Review Locations Identified in Orange.



VM Inspection Review
Days by Monitor

137

Total Circuit Miles of VM
Inspections Reviewed

608

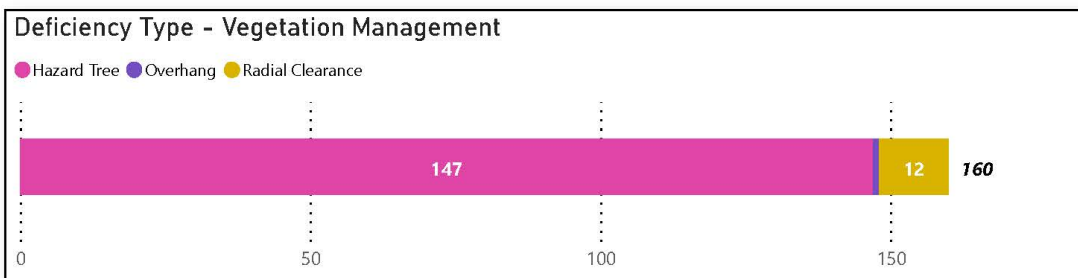
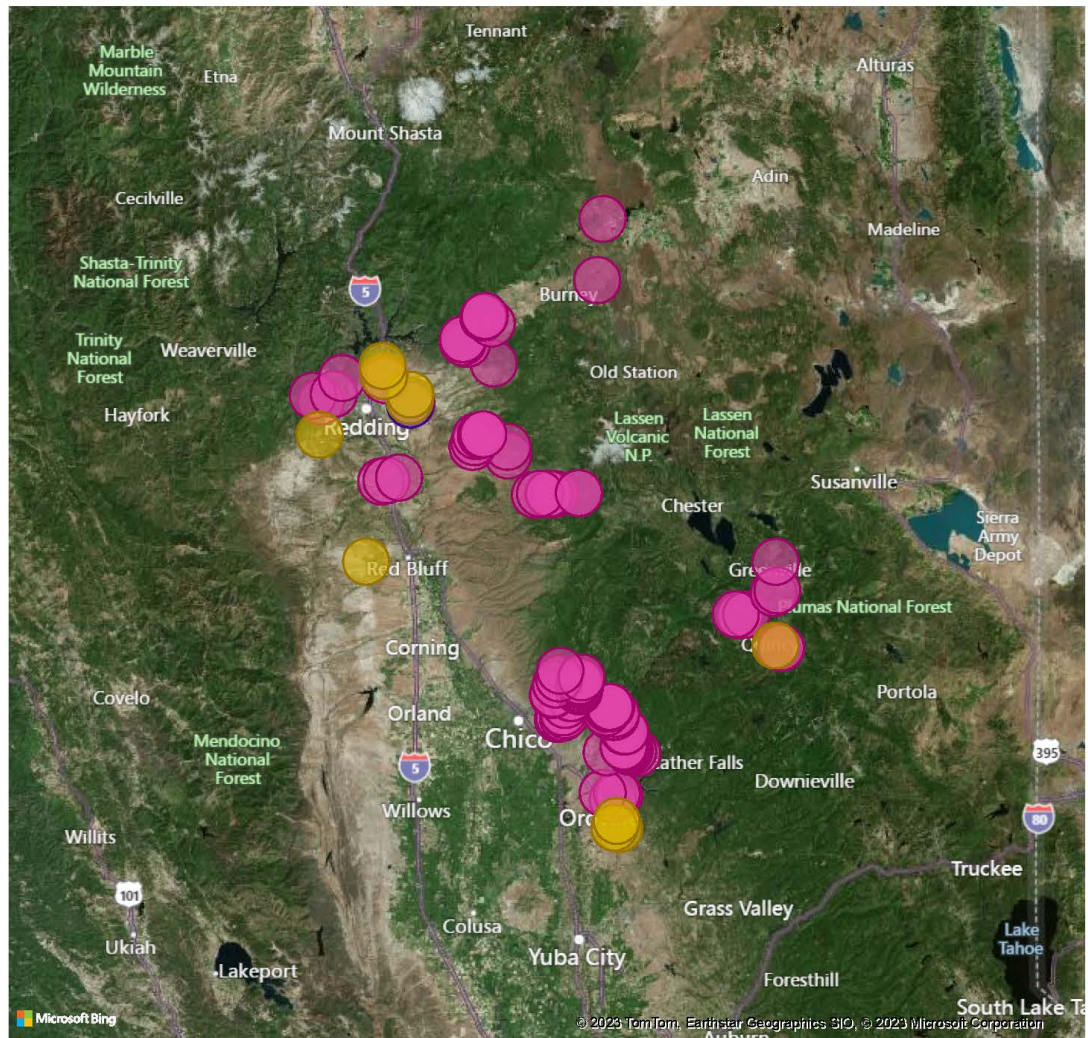
Miles Reviewed per
Deficiency

3.8



NORTH STATE COUNTIES - VM DASHBOARD

VM Deficiency Locations.





Inspection Work Commitment (Enhanced Powerline Safety Settings)

Judgment Commitment

PG&E shall implement its Enhanced Powerline Safety Settings (“EPSS”) program pursuant to the then-applicable WMP; for 2022, this includes implementing the EPSS program on all distribution circuits, approximately [3,593] miles²⁰, in the North State Counties HFTDs by the end of 2022. The North State DAs’ Safety Monitor will inspect PG&E’s implementation of this program pursuant to the then-applicable WMP.

Commitment Analysis

EPSS changes PG&E’s electrical equipment settings to reduce the potential for an ignition by automatically shutting off power within 1/10th of a second if an object (e.g., vegetation) comes into contact with a distribution line. PG&E implemented an EPSS pilot program in July 2021 on approximately 11,500 miles of distribution circuits in HFTD. From July 2021 through October 2021, PG&E reported a 40% reduction in ignitions as compared to the past three-year average; and an 80% reduction in the CPUC-reportable ignitions as compared to the past three-year average for the same period. Thereafter, PG&E decided to expand the EPSS program in 2022 to all distribution circuits in HFTD areas in their service territory, as well as select non-HFTD areas.²¹

PG&E reported to the Monitor that it has implemented EPSS on all HFTD distribution circuits in the North State Counties during 2022. Specifically, PG&E reported that it has implemented EPSS capability on all 3,505 HFTD distribution circuit miles, as well as an additional 1,098 miles of “EPSS Buffer Area” distribution circuits²², for a total of 4,603 circuit miles in the North State Counties. These data is summarized in a table below, and the North State Counties EPSS implementation maps are included in [Appendix B](#).

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

Table 3. PG&E Miles of EPSS Enabled Assets - 2022 HFTD

Project	HFTD (Miles)	EPSS Buffer Area (Miles)	Total EPSS Capable Miles	Commitment Miles
North State Counties	3,505	1,098	4,603	3,593

²⁰ Page 13 of the Judgment indicates that 3,593 miles is the relevant figure for distribution circuit miles in HFTDs in the North State Counties.

²¹ These data are sourced from internal PG&E presentations, interviews, and data request responses provided to the Monitor.

²² According to PG&E, the discrepancy between PG&E’s reported 3,505 miles and the 3,593 miles referenced in the Judgment is due to the approximate nature of the latter figure.



Inspection Work Commitment (Undergrounding)

Judgment Commitment

PG&E currently plans to underground approximately 400 miles of distribution lines in the North State Counties, combined, by December 31, 2024 (approximately 170 miles pursuant to the WMP and approximately 230 miles pursuant to the Butte and Greenville Rebuild projects). Should PG&E's plans change, PG&E shall advise the North State DAs' Safety Monitor, provided that notwithstanding any other provision in this Judgment, undergrounding less than 400 miles will not give rise to a Deficiency.

2022 WMP Commitment

Complete 55 circuit miles of undergrounding work as part of the Butte County Rebuild program in 2022.²³

Commitments Analysis

According to PG&E, undergrounding electric distribution lines in high fire-risk areas is the best long-term solution for keeping customers and communities safe. Placing overhead lines underground reduces ignition risk by approximately 99 percent. The benefits of undergrounding also include wildfire risk reduction, a potential decrease in the need for Public Safety Power Shutoff and EPSS outages, improved reliability, a reduction of emergency activations during winter storms, less vegetation management work in areas with undergrounded facilities in the future, and beautification.²⁴

PG&E reports having undergrounded 115.9 miles of electric distribution lines in the North State Counties as of December 31, 2022.

The Butte County Rebuild Program is focused on undergrounding the electric distribution within the Town of Paradise and lower Magalia following the Camp Fire. PG&E reports having undergrounded 58.7 miles of electric distribution lines as part of the Butte County Rebuild program in 2022, which achieves the 2022 WMP commitment to complete 55 miles in 2022.

²³ 2022 WMP, page 612.

²⁴ 2022 WMP, page 553.



Inspection Work Commitment (Public Safety Power Shutoff)

Judgment Commitment

PG&E proactively shuts off power when a potential high-risk wildfire event is forecasted under the Public Safety Power Shutoff (“PSPS”) program. When a PSPS is planned in one or more of the North State Counties, prior to the PSPS being initiated, PG&E will notify the North State DAs' Safety Monitor and permit the North State DAs' Safety Monitor to observe its implementation related to the North State Counties, provided that notwithstanding any other provision in this Judgment, PG&E's decisions under and implementation of the PSPS program will not give rise to a Deficiency, however the Monitor may provide feedback to PG&E and the North State DAs about PG&E's implementation of PSPS.

Commitment Analysis

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

During the first year of the Monitorship, PG&E initiated one PSPS event during severe weather that took place between October 22-24, 2022, as outlined below:

- i. On October 19, 2022, PG&E notified the Monitor that the PG&E Emergency Operations Center (“EOC”) had been activated for a potential PSPS event due to forecast weather conditions on October 22-24, 2022, with Butte, Shasta, and Tehama Counties under PSPS Watch.
- ii. On October 21, 2022, PG&E invited the Monitor to attend, and the Monitor attended, twice daily “PSPS Event EOC Floor Briefing” calls on which PG&E personnel discussed current and forecast weather and other ambient conditions to determine whether to implement PSPS and de-energize portions of the grid.
- iii. PG&E informed the Monitor that potentially affected customers received direct communications with anticipated power shutoff information. The Monitor also reviewed the PG&E public website that provided information to customers about potential power shutoff locations, dates, and times.
- iv. The EOC was deactivated on October 24, 2022, without implementing PSPS to de-energize customers.
- v. On November 7, 2022, as required by Resolution ESRB-8 and in accordance with Ordering Paragraph 1 of CPUC Decision 19-05-042, PG&E issued a compliance report for the October 22-24, 2022 Weather Event, which was posted on the CPUC website.²⁵

²⁵ Resolution ESRB-8 requires utilities to submit a compliance report to the CPUC Safety and Enforcement Division within 10 days after the initiation of each PSPS de-energization event.



PG&E complied with Inspection Work Commitment (Public Safety Power Shutoff) during the first year of the Monitorship. The Monitor will continue to monitor PG&E's use of the Public Safety Power Shutoff program over the course of the coming year.



MONITORSHIP YEAR 1: DEFICIENCIES AND STATUS

At the Six-Month Meeting with PG&E representatives and the North State DAs held on November 18, 2022, the Monitor reported 38 total Deficiencies based on conditions observed during quality assurance inspection reviews conducted through October 20, 2022. For the period between October 20, 2022, and April 10, 2023, the Monitor issued an additional 168 Deficiencies for a total of 206 Deficiencies issued for inspection reviews conducted during the first year of the Monitorship. As of May 24, 2023, the cure status for Deficiencies issued during the first year of the Monitorship, listed in [Appendix A](#), is as follows:

- Cure Proposal Pending²⁶: 85
- Pending Cure: 30
- Cured: 52
- Remediated in the Ordinary Course²⁷: 31
- Retracted²⁸: 8

To date, PG&E has complied with all deadlines relating to the Deficiency meet and confer, cure proposal, and cure processes.²⁹

²⁶ The Monitor issued 80 Deficiency notices on May 8, 2023, which accounts for the significant number of Deficiency notices in this status category. Many of the Hazard Trees identified in this batch of Deficiencies were listed by PG&E as being on “Hold” status. See the section titled “Information for Hold/Refusal Trees” later in this report for additional discussion.

²⁷ This category applies to a condition identified by PG&E prior to receiving the corresponding Deficiency notice from the Monitor. For these Deficiencies, the Monitor tracks the remediation of the underlying condition and then classifies the Deficiency as “Remediated in the Ordinary Course” rather than “Cured”.

²⁸ This category applies to Deficiencies noticed to PG&E that were subsequently determined by the Monitor not to be Deficiencies following the meet and confer process with PG&E.

²⁹ PG&E invoked a “Force Majeure Event” to obtain a cure proposal or cure deadline extension for five Deficiencies where access was limited due to extreme weather or rockslide and one Deficiency relating to a Caltrans permitting delay.



MONITORSHIP YEAR 1: CONSIDERATIONS

The following is a summary of Considerations identified in connection with the first year of the Monitorship. Per the Judgment, the scope of the Monitor's role is to monitor PG&E's compliance with the Performance Commitments and the Inspection Work Commitments. In so doing, the Monitor is permitted to discuss with PG&E and the North State DAs any related issues observed during the course of the Monitorship. While the Monitor's role is not to provide recommendations to PG&E regarding such issues, the Monitor presents the following Considerations: instances of Immediate Hazards, the development of the Monitor Dashboard, PG&E's new Operational Learnings Team, an overview of the discontinuation of the EVM program, electric distribution checklist discrepancies, information for Hold/Refusal trees, the data request process for the Annual Compliance Report, and the status of PG&E's 2023-2025 Wildfire Mitigation Plan.

Immediate Hazards

While not stipulated in the Judgment, in the interest of public safety, the Monitor may report to PG&E any observed VM or infrastructure condition that poses an imminent wildfire risk and therefore merits immediate attention from PG&E (each, an "Immediate Hazard"). During the first year of the Monitorship, the Monitor identified and notified PG&E of three Immediate Hazards, two of which related to vegetation in contact/proximity with primary conductor (absent sparking or smoking), and one of which related to a broken branch hanging above primary conductor. All Immediate Hazards reported to PG&E were promptly mitigated, and none of the Immediate Hazards were determined to be Deficiencies under the Judgment.

Monitor Dashboard

In addition to regular weekly meetings with PG&E and bi-weekly meetings with the North County DAs, the Monitor has developed and launched the Monitor Dashboard for the North State Counties. This tool displays regularly updated information about inspection reviews for transmission, distribution, and vegetation management inspections, as well as Deficiency locations, types, and cure status.

PG&E Operational Learnings Team

In March 2023, PG&E informed the Monitor that it established what it calls the "Operational Learnings Team" ("OLT") to review and integrate the Monitor's findings into PG&E's business, including identifying potential trends across counties and reviewing data relating to teams, contractors, trees, third party impacts, and other data points. The OLT intends to share operational learnings bi-annually in connection with the Six-Month and Annual Meetings with the Monitor and the North State DAs. PG&E informed the Monitor that the OLT plans to present its initial learnings at the first Annual Meeting. Although the OLT was not contemplated under the Judgment, the Monitor commends PG&E for standing up a team to



drive internal improvement. The Monitor looks forward to learning more about the OLT and its initial findings at the Annual Meeting.

Enhanced Vegetation Management (EVM) Program Review

PG&E discontinued its EVM program at the end of 2022. From the program's inception in 2019 through 2022, EVM inspections took place on certain risk prioritized distribution circuits, with expanded radial and overhang clearance procedures beyond regulatory requirements. In lieu of the EVM program, PG&E reported to the Monitor that it will deploy its 2023 wildfire budget to support other core resiliency programs including the routine transmission and distribution vegetation management programs, enhanced inspections and repairs for transmission and distribution infrastructure, system hardening (including overhead and undergrounding), PSPS, EPSS, and new VM initiatives.

To address areas of particularly high fire risk, PG&E is initiating the FTI pilot program referenced earlier in this report. PG&E has indicated that the identified Areas of Concern cover portions of 20 counties in its service territory, including Butte, Plumas, Shasta, and Tehama Counties. According to a presentation made by PG&E, the FTI pilot program in 2023 includes an Area of Concern in Butte County. The Monitor intends to review the results of the FTI pilot program in the North State Counties when available.

Although PG&E has ended its EVM program, 385,428 trees identified for removal across PG&E's service territory during the program had not been remediated at the conclusion of the program. PG&E has indicated that these trees will be reassessed and that a significant number of trees may not require removal upon re-inspection if deemed healthy. Of those trees that will be confirmed for removal, PG&E currently projects that it will remove such trees over a five-year period at an incremental pace. PG&E projects it will remove 15,000 trees in 2023, 20,000 trees in 2024, 25,000 trees in 2025, 25,000 trees in 2026, and 25,000 trees in 2027, resulting in an approximate 55% risk drawdown following removal of the aggregate 110,000 trees during that five-year period. PG&E refers to this program for reassessment and removal of EVM-identified trees as the "Tree Removal Inventory" ("TRI") program. The Monitor intends to review PG&E's implementation of the TRI program in the North State Counties as it progresses.

In addition to the VM program changes discussed above, PG&E has issued new VM standards and procedures that will be effective as of June 20, 2023. The new standards and procedures remain under review by the Monitor and will be incorporated into the Monitor's VM inspection review protocol for PG&E inspections conducted on or after June 20, 2023.

Electric Distribution Checklist Discrepancies

In connection with quality assurance sampling of PG&E electric distribution asset inspections, the Monitor reviewed 4,591 electric distribution assets in the North Counties during the first year of the Monitorship. Of the assets reviewed, approximately 18% had at least one inspection checklist question for which the Monitor's personnel identified a condition that was not identified by PG&E's inspector. The distribution checklist questions



with the highest discrepancy rate between PG&E's and the Monitor's responses were (i) 22% - Conductor has splices tied in close proximity to insulator preventing free movement of splice with conductor, (ii) 11% - Tap clamps installed incorrectly, and (iii) 9% - Guy wire identification. These checklist discrepancies did not rise to the level of a Deficiency under the Judgment and are presented for PG&E's consideration only.

Information for Hold/Refusal Trees

During the first year of the Monitorship, the Monitor's personnel reported a significant number of VM conditions resulting in Deficiencies for which the identified tree was listed as having "Hold" or "Refusal" status in PG&E's VM record associated with the tree. The Monitor understands that tree "Hold" or "Refusal" status indicates that a PG&E inspector identified a hazardous condition prior the Monitor's inspection review, but that the processes for performing any prescribed tree work has been delayed for a specific reason. Regarding "Hold" trees, the delay may be associated with a location-based permitting process involving a third-party or may be the result of PG&E internal processes, such as environmental review. "Refusal" status generally involves the property owner having objected to the tree work prescribed by PG&E.

The Monitor does not currently have access to PG&E records that would enable it, prior to submitting a Deficiency notice, to determine whether and how PG&E is prosecuting "Hold" or "Refusal" processes or the remediation of any identified hazardous condition within the timeframe required by its internal guidelines and applicable law. While the ultimate remediation of the hazardous condition for "Hold" and "Refusal" trees would be classified as Remediated in the Ordinary Course due to its identification by PG&E prior to the Monitor's Deficiency notice, the Monitor expects to continue submitting "Hold" and "Refusal" trees as Deficiencies until it has access to the associated information that would allow the Monitor to assess PG&E's compliance.

Shortly before the issuance of this Annual Compliance Report, PG&E reached out to the Monitor to acknowledge that the Monitor does not currently have access to complete "Hold" and "Refusal" records and that PG&E would work with the Monitor during 2023 to facilitate appropriate access.

Annual Compliance Report Data Requests Process

In order to assess PG&E's compliance with the various Performance and Inspection Work Commitments discussed above, the Monitor has requested access to relevant PG&E information, documents, records, facilities, and employees. In connection therewith, the Monitor has participated in site visits and held numerous interviews with PG&E personnel during the first year of the Monitorship, in addition to having submitted many written requests for specific data and information from PG&E. Although these processes have broadly functioned effectively, the Monitor believes that process improvements, particularly with respect to annual report related data requests responses, should be made in the second year of the Monitorship.



The Monitor recognizes that PG&E's recordkeeping constitutes a substantial undertaking. The provision of electric and natural gas services to approximately 16 million customers across a 70,000 mile service area generates a significant quantity of data, and the management of that data requires both input from multiple teams and management across multiple macro-scale platforms. PG&E's service area is divided into multiple regional management units, and most activity within the company is assessed at this level. The Monitorship, however, requires the assessment of PG&E assets and activities within the discrete boundaries of the North State Counties rather than PG&E's more familiar regional boundaries. The Monitor appreciates that PG&E has had and will continue to have to develop new processes for the extraction of data specifically relevant to the North State Counties.

To address the challenges outlined above, in March 2023, the Monitor and PG&E established a standing weekly meeting to prioritize and discuss the status of outstanding data requests. These meetings and other conversations with PG&E personnel have improved the Monitor's understanding of the structure of PG&E's data management architecture and data request review and response processes.

In preparation of this Annual Compliance Report, the Monitor requested various data sets to assess PG&E's compliance with certain Inspection Work Commitments. While PG&E responded to each such request, in some cases after multiple follow up requests by the Monitor for additional or clarifying information, the Monitor was unable to confirm PG&E's compliance with its annual electric distribution and VM inspection commitments based on the data provided. The Monitor did not determine that PG&E failed to comply with the commitments; rather, the data provided to the Monitor was insufficient to confirm compliance and additional data would be required to do so. As noted in the "Commitments Analysis" sections of the Electric Distribution Inspection and Vegetation Management Patrols Inspection Work Commitments sections above, PG&E has agreed to provide the Monitor with data substantiating compliance with the Electric Distribution Inspection Work Commitment and the Vegetation Management Patrols Inspection Work Commitment within 30 days following the issuance of this report. Failure to provide substantiating data within the 30-day period will result in a Deficiency.

PG&E acknowledged having experienced unanticipated complexities with the data request responses geographically limited to the North State Counties and appreciated the Monitor's feedback on the data provided. PG&E expressed its desire to improve the data request response process in connection with future reports and agreed to work with the Monitor on such improvements over the coming year.

2023-2025 WMP

PG&E filed its 2023-2023 Wildfire Mitigation Plan (the "2023 WMP") with the Office of Energy Infrastructure Safety ("OEIS") on March 27, 2023. As of the date of this Annual Compliance Report, PG&E has yet to receive the anticipated revision notices from the OEIS, which are expected to be issued by the end of June 2023. Although the 2023 WMP is not



expected to be declared effective until later in 2023, the Monitor is reviewing the initial 2023 WMP filing and will monitor the pending OEIS revision notices and PG&E responses thereto.



APPENDIX A: MONITORSHIP YEAR ONE DEFICIENCIES

North State Counties Deficiency Tracker

As of 5/24/2023

Deficiency #	County	Work Commitment	Type	Notice Date	Cure Deadline	Status
NC 1	Butte	Vegetation Management Patrols	Radial Clearance	9/27/22	N/A	Remediated in Ordinary Course
NC 2	Butte	Vegetation Management Patrols	Radial Clearance	9/27/22	N/A	Remediated in Ordinary Course
NC 3	Butte	Vegetation Management Patrols	Radial Clearance	9/27/22	N/A	Remediated in Ordinary Course
NC 4	Tehama	Vegetation Management Patrols	Radial Clearance	9/27/22	12/24/2022	Cured
NC 5	Butte	Vegetation Management Patrols	Hazard Tree	9/27/22	12/9/2022	Cured
NC 6	Shasta	Vegetation Management Patrols	Radial Clearance	9/27/22	N/A	Remediated in Ordinary Course
NC 7	Shasta	Vegetation Management Patrols	Radial Clearance	9/27/22	N/A	Remediated in Ordinary Course
NC 8	Shasta	Vegetation Management Patrols	Radial Clearance	9/27/22	12/9/2022	Cured
NC 9	Shasta	Vegetation Management Patrols	Hazard Tree	10/18/2022	12/30/2022	Cured
NC 10	Shasta	Vegetation Management Patrols	Hazard Tree	10/18/2022	12/30/2022	Cured
NC 11	Shasta	Vegetation Management Patrols	Hazard Tree	10/18/2022	12/30/2022	Cured
NC 12	Shasta	Vegetation Management Patrols	Hazard Tree	10/18/2022	12/30/2022	Cured
NC 13	Shasta	Vegetation Management Patrols	Hazard Tree	10/18/2022	N/A	Remediated in Ordinary Course
NC 14	Shasta	Vegetation Management Patrols	Hazard Tree	10/18/2022	N/A	Remediated in Ordinary Course
NC 15	Shasta	Vegetation Management Patrols	Hazard Tree	10/18/2022	12/30/2022	Cured
NC 16	Shasta	Vegetation Management Patrols	Hazard Tree	10/31/2022	1/15/2023	Cured
NC 17	Shasta	Vegetation Management Patrols	Overhang	10/31/2022	1/1/2023	Cured
NC 18	Shasta	Vegetation Management Patrols	Hazard Tree	10/31/2022	1/1/2023	Cured
NC 19	Shasta	Vegetation Management Patrols	Radial Clearance	10/31/2022	N/A	Remediated in Ordinary Course
NC 20	Shasta	Vegetation Management Patrols	Radial Clearance	10/31/2022	N/A	Remediated in Ordinary Course
NC 21	Shasta	Vegetation Management Patrols	Hazard Tree	10/31/2022	1/15/2023	Cured
NC 22	Shasta	Vegetation Management Patrols	Radial Clearance	10/31/2022	1/15/2023	Cured
NC 23	Shasta	Vegetation Management Patrols	Radial Clearance	10/31/2022	1/15/2023	Cured
NC 24	Butte	Electric Distribution Assets	Asset Maintenance	11/14/2022	2/11/2023	Cured
NC 25	Plumas	Electric Distribution Assets	Secondary Overgrown	11/14/2022	4/11/2023	Remediated in Ordinary Course
NC 26	Butte	Electric Distribution Assets	Hazardous Strike Tree	11/14/2022	2/11/2023	Remediated in Ordinary Course
NC 27	Plumas	Electric Distribution Assets	Asset Maintenance	11/14/2022	5/31/2023	Remediated in Ordinary Course
NC 28	Plumas	Electric Distribution Assets	Asset Maintenance	11/14/2022	3/31/2023	Cured
NC 29	Plumas	Electric Distribution Assets	Pole Clearing	11/14/2022	2/11/2023	Remediated in Ordinary Course
NC 30	Butte	Electric Distribution Assets	Hazardous Strike Tree	11/14/2022	2/11/2023	Cured
NC 31	Butte	Electric Distribution Assets	Hazardous Strike Tree	11/14/2022	2/11/2023	Remediated in Ordinary Course
NC 32	Butte	Electric Distribution Assets	Hazardous Strike Tree	11/14/2022	2/11/2023	Remediated in Ordinary Course
NC 33	Butte	Electric Distribution Assets	Hazardous Strike Tree	11/14/2022	2/11/2023	Remediated in Ordinary Course
NC 34	Butte	Electric Distribution Assets	Hazardous Strike Tree	11/14/2022	2/11/2023	Cured
NC 35	Butte	Electric Distribution Assets	Hazardous Strike Tree	11/14/2022	2/11/2023	Cured
NC 36	Butte	Electric Distribution Assets	Hazardous Strike Tree	11/14/2022	2/11/2023	Remediated in Ordinary Course
NC 37	Shasta	Vegetation Management Patrols	Hazard Tree	11/14/2022	N/A	Retracted
NC 38	Shasta	Vegetation Management Patrols	Hazard Tree	11/14/2022	N/A	Retracted
NC 39	Shasta	Vegetation Management Patrols	Hazard Tree	12/13/2022	3/13/2023	Cured
NC 40	Shasta	Vegetation Management Patrols	Hazard Tree	12/13/2022	3/13/2023	Cured
NC 41	Plumas	Vegetation Management Patrols	Hazard Tree	12/13/2022	3/13/2023	Cured
NC 42	Plumas	Vegetation Management Patrols	Hazard Tree	12/13/2022	3/13/2023	Cured
NC 43	Plumas	Vegetation Management Patrols	Hazard Tree	12/13/2022	3/13/2023	Cured
NC 44	Shasta	Vegetation Management Patrols	Radial Clearance	12/13/2022	N/A	Retracted
NC 45	Plumas	Vegetation Management Patrols	Radial Clearance	12/13/2022	N/A	Retracted
NC 46	Plumas	Vegetation Management Patrols	Radial Clearance	12/13/2022	3/13/2023	Cured
NC 47	Tehama	Electric Distribution Assets	Asset Maintenance	2/2/2023	2/26/2023	Remediated in Ordinary Course
NC 48	Butte	Electric Distribution Assets	Hazardous Strike Tree	2/2/2023	N/A	Remediated in Ordinary Course
NC 49	Shasta	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Cured
NC 50	Shasta	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Remediated in Ordinary Course
NC 51	Shasta	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Cured
NC 52	Shasta	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Cured
NC 53	Shasta	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Cured
NC 54	Shasta	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Cured
NC 55	Plumas	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Cured
NC 56	Plumas	Vegetation Management Patrols	Hazard Tree	2/2/2023	7/20/2023	Pending Cure
NC 57	Plumas	Vegetation Management Patrols	Hazard Tree	2/2/2023		Cure Proposal Pending - Force Majeure
NC 58	Plumas	Vegetation Management Patrols	Hazard Tree	2/2/2023		Cure Proposal Pending - Force Majeure
NC 59	Plumas	Vegetation Management Patrols	Hazard Tree	2/2/2023		Cure Proposal Pending - Force Majeure
NC 60	Plumas	Vegetation Management Patrols	Hazard Tree	2/2/2023		Cure Proposal Pending - Force Majeure
NC 61	Tehama	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Cured
NC 62	Tehama	Vegetation Management Patrols	Hazard Tree	2/2/2023	N/A	Remediated in Ordinary Course
NC 63	Tehama	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Cured
NC 64	Butte	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Cured
NC 65	Butte	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Remediated in Ordinary Course
NC 66	Butte	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Cured
NC 67	Butte	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Cured
NC 68	Butte	Vegetation Management Patrols	Hazard Tree	2/2/2023	5/1/2023	Cured
NC 69	Tehama	Electric Distribution Assets	Asset Maintenance	2/17/2023	5/23/2023	Remediated in Ordinary Course

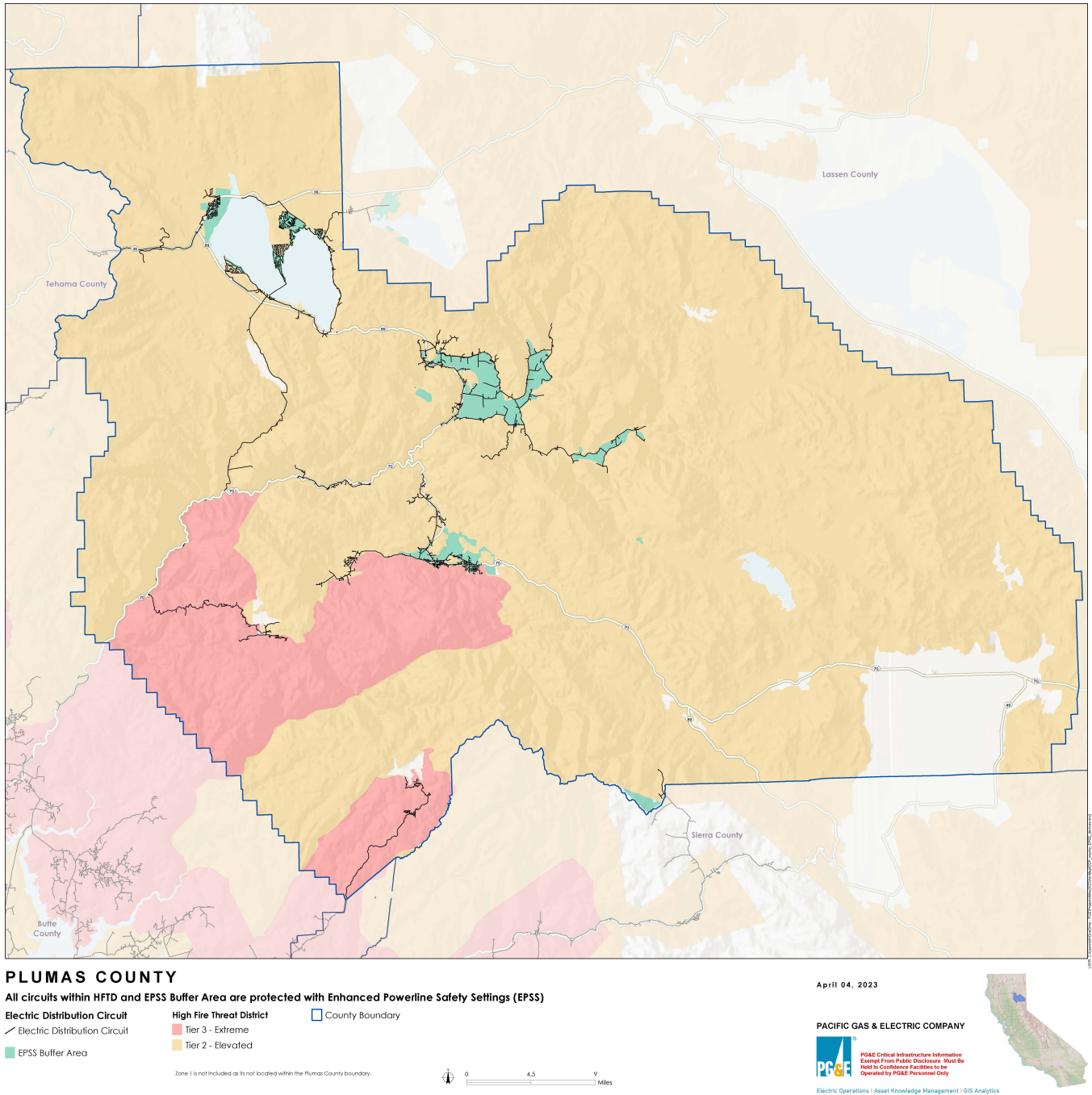


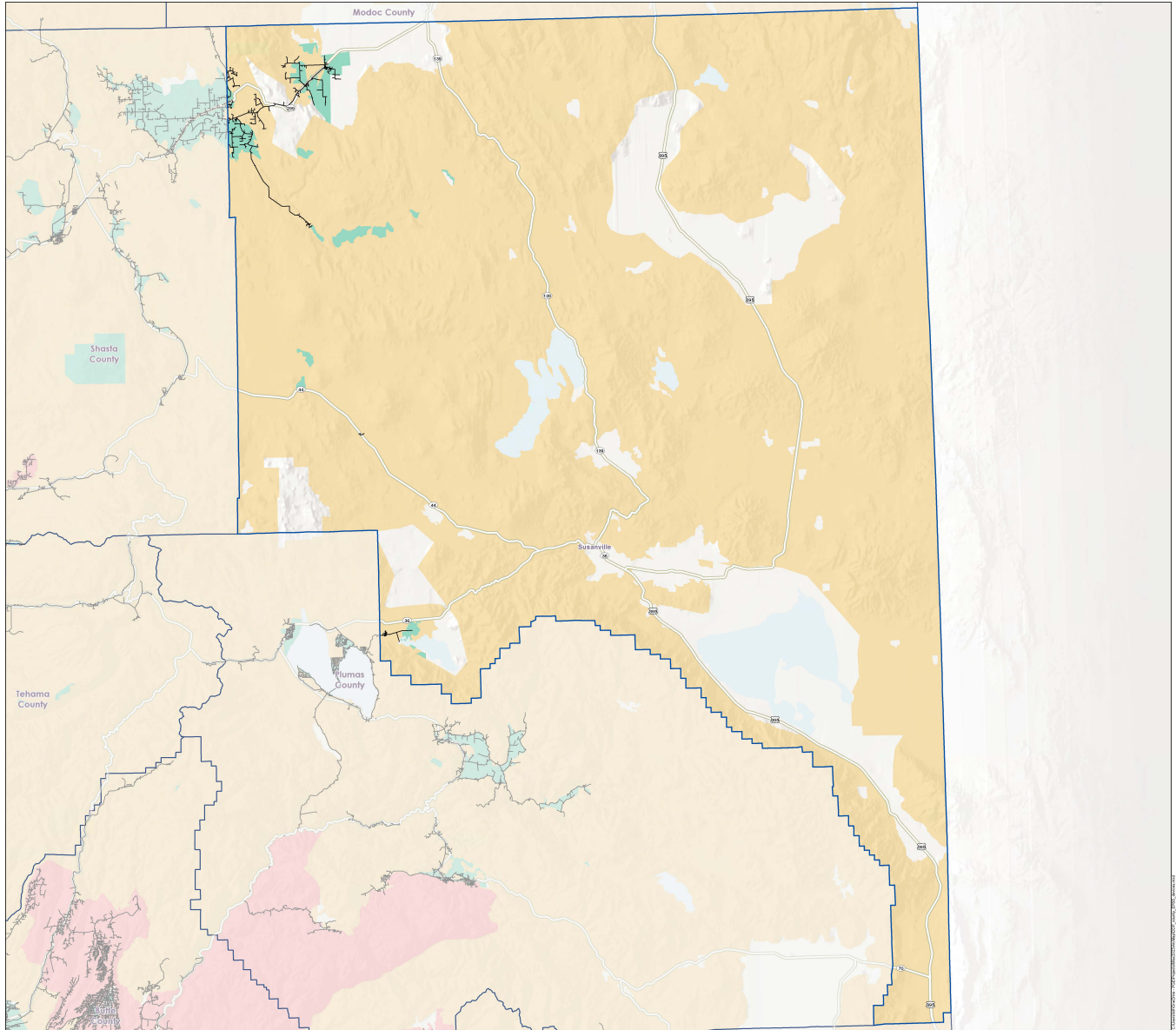
NC 70	Shasta	Electric Distribution Assets	Asset Maintenance	2/17/2023	9/30/2023	Pending Cure
NC 71	Tehama	Electric Distribution Assets	Asset Maintenance	2/17/2023	N/A	Retracted
NC 72	Shasta	Electric Distribution Assets	Asset Maintenance	2/17/2023	9/30/2023	Pending Cure
NC 73	Tehama	Electric Distribution Assets	Asset Maintenance	2/17/2023	9/30/2023	Pending Cure
NC 74	Butte	Vegetation Management Patrols	Hazard Tree	2/17/2023	5/19/2023	Cured
NC 75	Butte	Vegetation Management Patrols	Hazard Tree	2/17/2023	5/19/2023	Cured
NC 76	Butte	Vegetation Management Patrols	Hazard Tree	2/17/2023	2/2/2023	Cured
NC 77	Shasta	Vegetation Management Patrols	Hazard Tree	2/17/2023	5/19/2023	Remediated in Ordinary Course
NC 78	Shasta	Vegetation Management Patrols	Hazard Tree	2/17/2023	5/19/2023	Cured
NC 79	Plumas	Electric Distribution Assets	Pole Clearing	3/3/2023	6/16/2023	Cured
NC 80	Tehama	Electric Distribution Assets	Asset Maintenance	3/3/2023	9/30/2023	Pending Cure
NC 81	Tehama	Electric Distribution Assets	Asset Maintenance	3/3/2023	6/7/2023	Remediated in Ordinary Course
NC 82	Tehama	Electric Distribution Assets	Asset Maintenance	3/3/2023	9/30/2023	Pending Cure
NC 83	Tehama	Electric Distribution Assets	Asset Maintenance	3/3/2023	6/7/2023	Pending Cure
NC 84	Shasta	Electric Distribution Assets	Asset Maintenance	3/3/2023	9/30/2023	Pending Cure
NC 85	Shasta	Electric Distribution Assets	Asset Maintenance	3/3/2023	9/30/2023	Cured
NC 86	Butte	Electric Distribution Assets	Asset Maintenance	3/3/2023	N/A	Cured
NC 87	Butte	Electric Distribution Assets	Asset Maintenance	3/3/2023	9/30/2023	Cured
NC 88	Tehama	Vegetation Management Patrols	Hazard Tree	3/3/2023	6/2/2023	Cured
NC 89	Tehama	Vegetation Management Patrols	Hazard Tree	3/3/2023	6/2/2023	Remediated in Ordinary Course
NC 90	Tehama	Vegetation Management Patrols	Hazard Tree	3/3/2023	6/2/2023	Cured
NC 91	Shasta	Electric Distribution Assets	Asset Maintenance	3/24/2023	3/29/2024	Pending Cure
NC 92	Tehama	Electric Distribution Assets	Asset Maintenance	3/24/2023	4/2/2024	Pending Cure
NC 93	Shasta	Electric Distribution Assets	Asset Maintenance	3/24/2023	10/4/2023	Pending Cure
NC 94	Shasta	Electric Distribution Assets	Asset Maintenance	3/24/2023	3/28/2024	Pending Cure
NC 95	Tehama	Electric Distribution Assets	Asset Maintenance	3/24/2023	4/1/2024	Pending Cure
NC 96	Shasta	Electric Distribution Assets	Asset Maintenance	3/24/2023	4/1/2024	Pending Cure
NC 97	Tehama	Electric Distribution Assets	Pole Clearing	3/24/2023		Cure Proposal Pending - Object
NC 98	Shasta	Vegetation Management Patrols	Hazard Tree	3/24/2023	6/23/2023	Remediated in Ordinary Course
NC 99	Shasta	Vegetation Management Patrols	Hazard Tree	3/24/2023	7/14/2023	Pending Cure
NC 100	Tehama	Vegetation Management Patrols	Hazard Tree	3/24/2023	N/A	Retracted
NC 101	Shasta	Vegetation Management Patrols	Hazard Tree	3/24/2023	6/23/2023	Cured
NC 102	Tehama	Vegetation Management Patrols	Hazard Tree	3/24/2023	7/14/2023	Pending Cure
NC 103	Tehama	Vegetation Management Patrols	Hazard Tree	3/24/2023	6/23/2023	Remediated in Ordinary Course
NC 104	Tehama	Vegetation Management Patrols	Hazard Tree	3/24/2023	6/23/2023	Cured
NC 105	Tehama	Vegetation Management Patrols	Hazard Tree	3/24/2023	6/23/2023	Cured
NC 106	Tehama	Vegetation Management Patrols	Hazard Tree	3/24/2023	N/A	Retracted
NC 107	Tehama	Vegetation Management Patrols	Hazard Tree	3/24/2023	7/14/2023	Remediated in Ordinary Course
NC 108	Tehama	Vegetation Management Patrols	Hazard Tree	3/24/2023	7/14/2023	Cured
NC 109	Shasta	Vegetation Management Patrols	Hazard Tree	3/24/2023	6/23/2023	Pending Cure
NC 110	Shasta	Vegetation Management Patrols	Hazard Tree	3/24/2023	N/A	Retracted
NC 111	Shasta	Vegetation Management Patrols	Hazard Tree	3/24/2023	6/23/2023	Pending Cure
NC 112	Shasta	Vegetation Management Patrols	Hazard Tree	3/24/2023	10/31/2023	Pending Cure
NC 113	Shasta	Vegetation Management Patrols	Hazard Tree	3/24/2023	10/31/2023	Pending Cure
NC 114	Butte	Vegetation Management Patrols	Hazard Tree	3/24/2023	6/23/2023	Pending Cure
NC 115	Butte	Vegetation Management Patrols	Hazard Tree	3/24/2023	6/23/2023	Pending Cure
NC 116	Shasta	Electric Distribution Assets	Asset Maintenance	4/14/2023	10/31/2023	Pending Cure
NC 117	Butte	Vegetation Management Patrols	Hazard Tree	4/14/2023	N/A	Remediated in Ordinary Course
NC 118	Butte	Vegetation Management Patrols	Hazard Tree	4/14/2023	N/A	Cured
NC 119	Butte	Vegetation Management Patrols	Hazard Tree	4/14/2023	7/17/2023	Pending Cure
NC 120	Butte	Vegetation Management Patrols	Hazard Tree	4/14/2023	7/17/2023	Pending Cure
NC 121	Butte	Vegetation Management Patrols	Hazard Tree	4/14/2023	7/17/2023	Pending Cure
NC 122	Butte	Vegetation Management Patrols	Hazard Tree	4/14/2023	7/17/2023	Pending Cure
NC 123	Butte	Vegetation Management Patrols	Hazard Tree	4/14/2023	7/17/2023	Pending Cure
NC 124	Butte	Vegetation Management Patrols	Hazard Tree	4/14/2023	7/17/2023	Pending Cure
NC 125	Butte	Vegetation Management Patrols	Hazard Tree	4/14/2023	7/17/2023	Pending Cure
NC 126	Shasta	Vegetation Management Patrols	Hazard Tree	4/14/2023	N/A	Remediated in Ordinary Course
NC 127	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 128	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 129	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 130	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 131	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 132	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 133	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 134	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 135	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 136	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 137	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 138	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 139	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 140	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending
NC 141	Butte	Vegetation Management Patrols	Hazard Tree	5/8/2023		Cure Proposal Pending

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APPENDIX B: EPSS IMPLEMENTATION MAPS





LASSEN COUNTY

All circuits within HFTD and EPSS Buffer Area are protected with Enhanced Powerline Safety Settings (EPSS)

Electric Distribution Circuit

Electric Distribution Circuit

EPSS Buffer Area

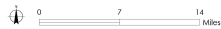
High Fire Threat District

Tier 3 - Extreme

Tier 2 - Elevated

County Boundary

Zone 1 is not included as it is not located within the Lassen County boundary.



April 04, 2023

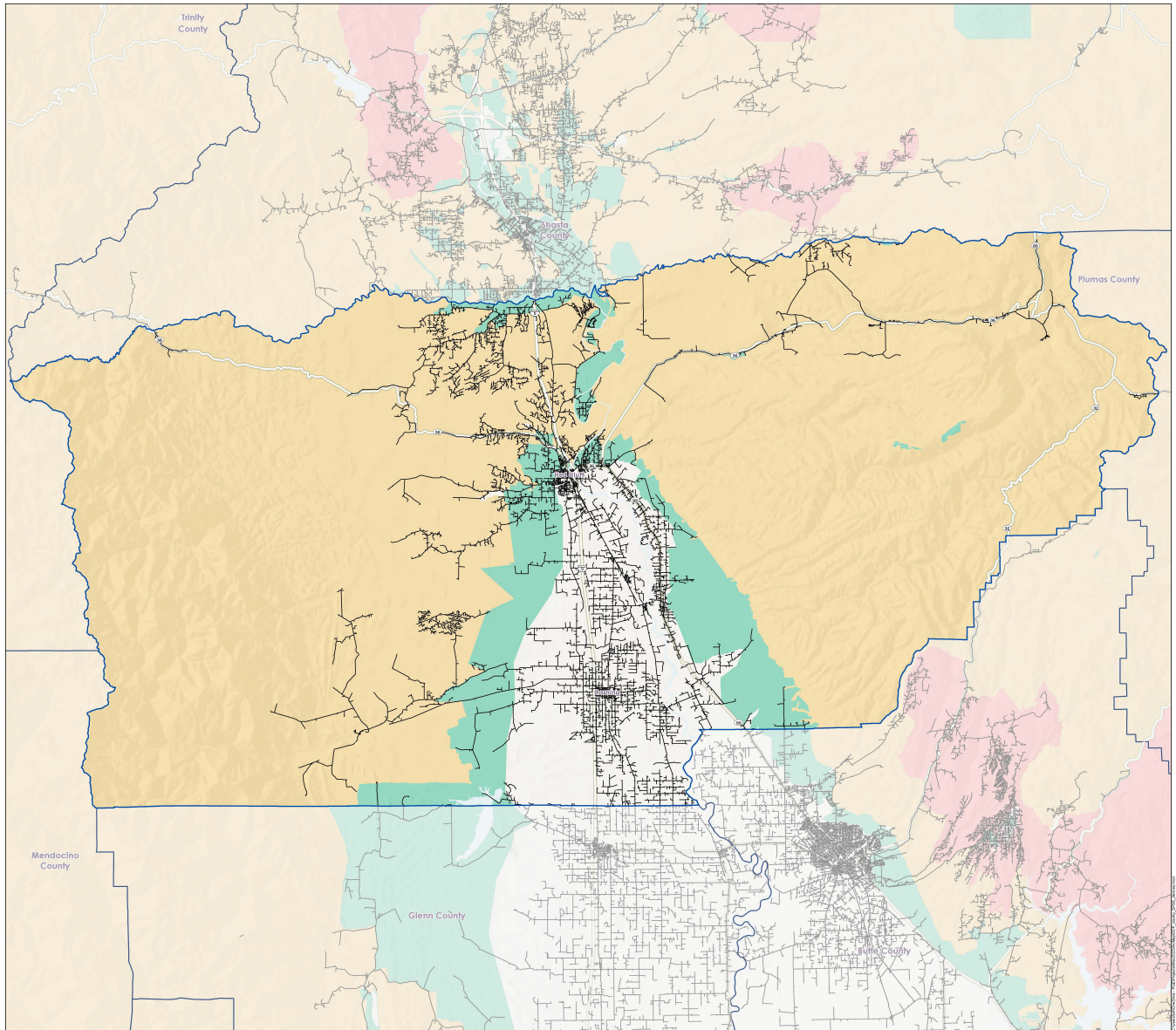
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TEHAMA COUNTY

All circuits within HFTD and EPSS Buffer Area are protected with Enhanced Powerline Safety Settings (EPSS)

Electric Distribution Circuit

Electric Distribution Circuit

EPSS Buffer Area

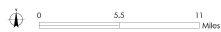
High Fire Threat District

Tier 3 - Extreme

Tier 2 - Elevated

County Boundary

Zone 1 is not included as it is not located within the Tehama County boundary.



April 04, 2023

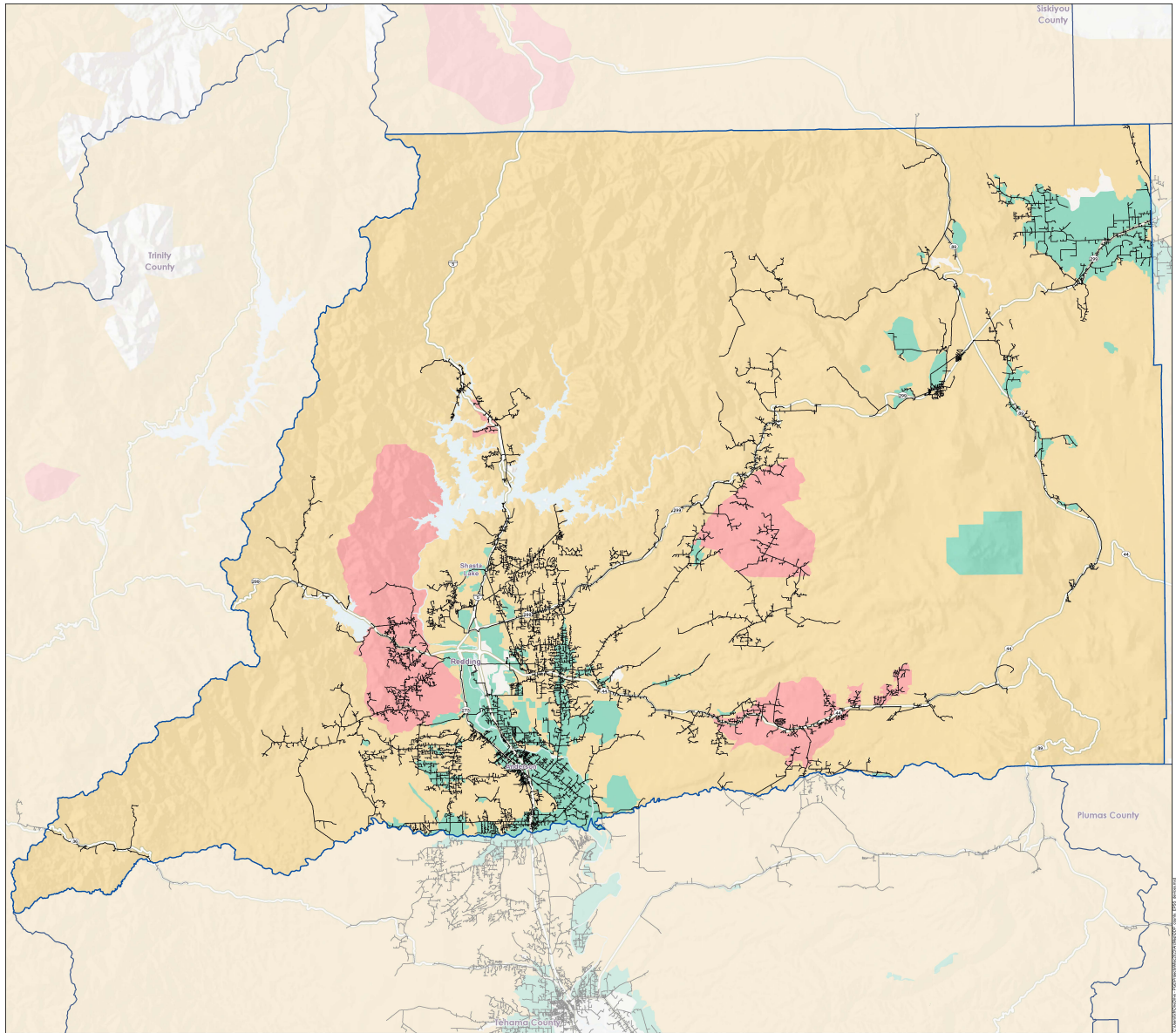
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SHASTA COUNTY

All circuits within HFTD and EPSS Buffer Area are protected with Enhanced Powerline Safety Settings (EPSS)

Electric Distribution Circuit

Electric Distribution Circuit

EPSS Buffer Area

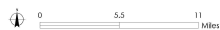
High Fire Threat District

Tier 3 - Extreme

Tier 2 - Elevated

County Boundary

Zone 1 is not included as it is not located within the Shasta County boundary.



April 04, 2023

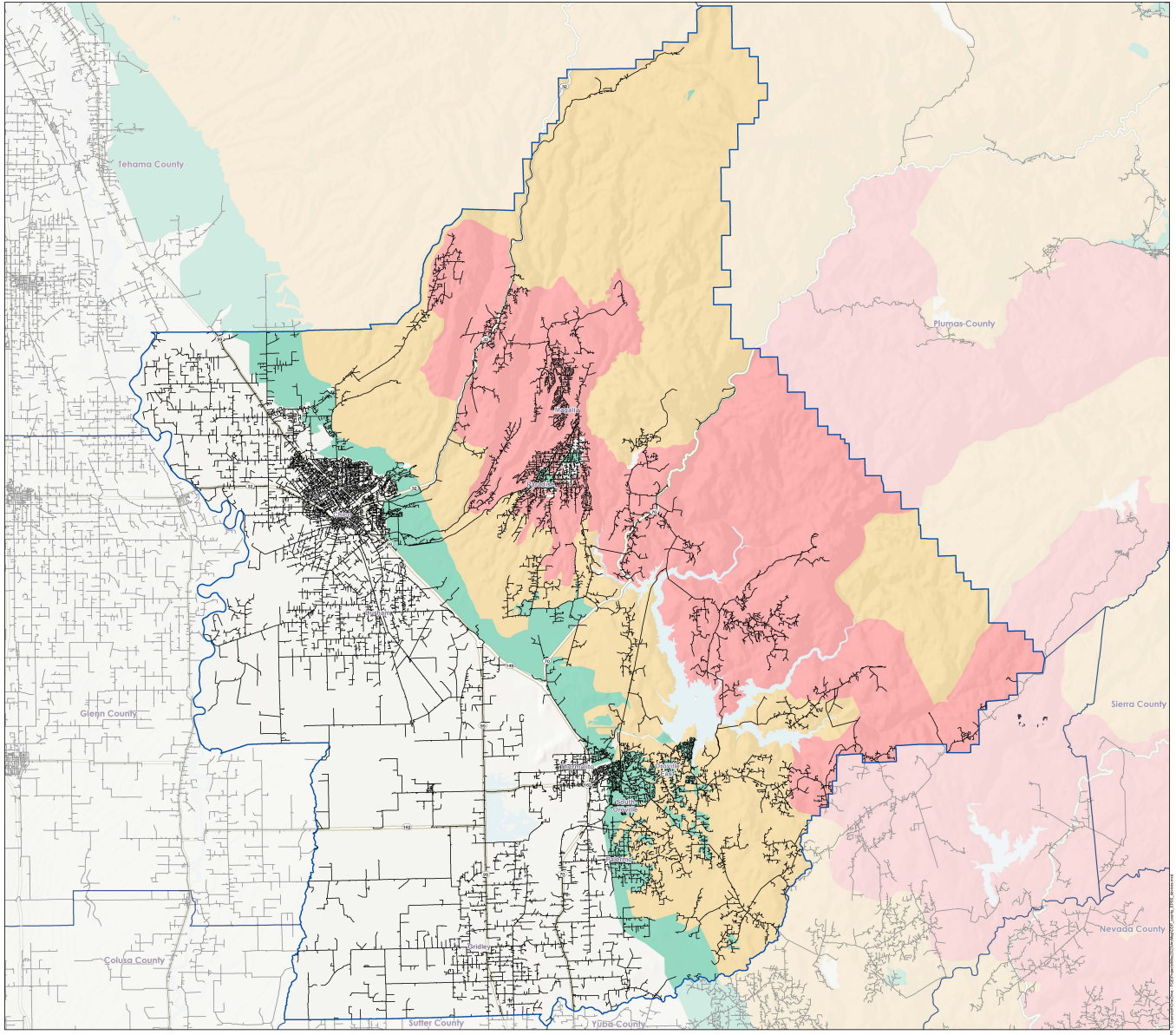
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BUTTE COUNTY

All circuits within HFTD and EPSS Buffer Area are protected with Enhanced Powerline Safety Settings (EPSS)

Electric Distribution Circuit
— Electric Distribution Circuit

High Fire Threat District
■ Tier 3 - Extreme
■ Tier 2 - Elevated

□ County Boundary

■ EPSS Buffer Area

Zone 1 is not included as it is not located within the Butte County boundary.



April 04, 2023

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