
**ENHANCED OVERSIGHT AND ENFORCEMENT PROCESS
CORRECTIVE ACTION PLAN**

90-DAY REPORT

PURSUANT TO RESOLUTION M-4852

NOVEMBER 4, 2021



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List of Attachments

Attachment E	Updated 2021 Enhanced Vegetation Management Scope of Work
Attachment J	Updated Verification of Sumeet Singh
Attachment N	Updated 2021 EVM Work Performed Outside the 2021 EVM Scope of Work

Pacific Gas and Electric Company (PG&E) respectfully submits this November 4, 2021 90-Day Report (November Report) updating its Corrective Action Plan in response to Ordering Paragraph 3 in Resolution M-4852 issued by the California Public Utilities Commission (Commission) on April 16, 2021 (Resolution).¹ In this November Report, we are providing updated information where applicable to each of the elements in the Resolution. We are also providing updated Attachments from the 90-Day Report submitted on August 4, 2021 (August Report).

EXECUTIVE SUMMARY

We submitted our Corrective Action Plan on May 6, 2021 and our first 90-Day Report on August 4, 2021. Since that time, we have continued to perform work consistent with our 2021 Enhanced Vegetation Management (EVM) Scope of Work. We have also continued to update the 2021 EVM Scope of Work with guidance and approval from the Wildfire Risk Governance Steering Committee (WRGSC) to include additional Circuit Protection Zones (CPZs) to address the highest risk areas in our service territory. Throughout the year, we have added additional resources both internally and with our contract partners, including standing up a constraint resolution organization. It is as a result of their dedicated efforts that we are making substantial progress implementing our 2021 EVM program.

Through September 30, 2021, we had completed and verified 1,282.01 miles of EVM work toward our goal of 1,800 miles.² More importantly, the vast majority of this work was performed on the highest risk CPZs so that we can achieve our goal of performing at least 80% of our work in the highest 20% of risk ranked CPZs. As indicated in Table 1 below, approximately 97.2% of the EVM work completed through September 30, 2021 was in the highest 20% of risk ranked CPZs.

As we continue to resolve constraints that would otherwise delay performance of tree work, we have pursued unconstrained tree work where possible on these affected segments as part of our continued emphasis to perform as much risk mitigating work as possible. While these miles have not yet been counted toward our EVM goal because constrained miles cannot be considered as complete until the constraints are removed, this work does represent risk reduction. In addition, the Vegetation Management organization is actively supporting

¹ This 90-Day Report is being provided on November 4, 2021 pursuant to the schedule provided in the November 1, 2021 letter from Commission Executive Director Rachel Peterson to Sumeet Singh, PG&E's Senior Vice President and Chief Risk Officer.

² The miles include: (1) 1,198.07 miles on the CPZs in our 2021 EVM Scope of Work which are identified in Attachment E to this November Report; and (2) 83.94 additional carry-over miles of EVM work on CPZs outside the 2021 EVM Scope of Work identified in Attachment N. A breakdown of the risk ranking for the EVM work performed to date is included in Table 1.

restoration and clean-up efforts in fire impacted areas to further reduce risk for our customers and communities.

Table 1 below provides a summary of our EVM work that has been completed and verified as of September 30, 2021:

Table 1: EVM Progress Through September 30, 2021³

Risk Tranche	Work Verified (WV) Miles	% of Total WV Miles
< = 10%	1,228.28	95.8%
> 10 – 20%	18.071	1.4%
> 20 – 30%	15.749	1.2%
> 30 – 40%	6.182	0.5%
> 40 – 50%	8.462	0.7%
> 50%	5.263	0.4%
Total	1,282.01	100.0%

In addition to the work performed, we are continuing frequent communications with our employees and contract partners. Establishing our Enhanced Vegetation Management Command Center, located at Bishop Ranch in San Ramon, California (EVM Command Center), is one of the most important recent developments to help further facilitate communications. The EVM Command Center acts as the central hub for the coordination of work and communication for the EVM team. Peter Kenny, PG&E Vice President has overall responsibility of PG&E’s Enterprise Vegetation Management organization, which includes the EVM Command Center. The EVM Command Center is a key part of the Lean Operating System that PG&E has instituted to allow rapid escalation of issues from local teams to the leadership of the organization and direction from the leadership of the organization back to the local teams.

The remainder of this November Report provides an update on the fourteen elements in the Corrective Action Plan. We look forward to continuing our work with the Commission, Safety

³ Please also note that the exact mileage of EVM work completed and verified by September 30, 2021 may change based on the Tree Assessment Tool issue discussed in Element 3 below.

and Enforcement Division (SED), Office of Energy Infrastructure Safety (Energy Safety), and interested parties to continue to refine and improve our EVM program.⁴

CORRECTIVE ACTION PLAN ELEMENTS

- 1. A detailed description of the circumstances that contributed to PG&E's failure to adequately prioritize the highest risk lines, as described in this Resolution and the WSD's EVM Audit, in its EVM in 2020**

We do not have any updated information to provide regarding this Element.

- 2. A detailed description of its risk model(s) for determining where to target EVM in the next 90 days, including the specific data sets and vegetation management records PG&E is using as inputs to the risk model, and the data modeling program(s) that make up PG&E's risk model**

We do not have any updated information to provide regarding this Element for the 2021 EVM Scope of Work. PG&E has not modified the risk models used for the 2021 EVM Scope of Work from the models originally described in the Corrective Action Plan. However, the next 90 days also includes the month of January 2022, so PG&E will discuss the process for developing the 2022 EVM Scope of Work including the risk models used for that scope of work. For information regarding the development of the 2022 EVM Scope of Work, please see Element 3.f below.

- 3. A detailed list of the EVM projects for the calendar year of the reporting date and the EVM plan for the subsequent calendar year, when available**

In this November Report, we are providing the following updates to Attachments E and N, which was included in the August Report: (a) updated status on the 2021 EVM Scope of Work and progress to date; (b) carryover miles; (c) constrained miles; (d) Major Woody Stem Exemptions; (e) identification of EVM issues; and (f) Status of the 2022 EVM Scope of Work.

a. Updated Status of the 2021 EVM Scope of Work

We included our 2021 EVM Scope of Work as Attachment E to the Corrective Action Plan and the August Report, and are including as Attachment E to the November Report an updated version of the 2021 EVM Scope of Work. Attachment E includes information concerning the

⁴ In the August Report, in addition to the fourteen Corrective Action Plan Elements, we provided information requested by SED and Energy Safety in a data request dated June 30, 2021. However, the data request specified that the additional information was to be provided in PG&E's "first 90-day report." The requested information was provided in the August Report and because the data request specified the first 90-Day Report, is not being repeated here.

CPZs in our 2021 EVM Scope of Work and the status of work on these CPZs. In this November Report, we are providing an update to our 2021 EVM Scope of Work that includes the addition of five (5) CPZs to specifically target ignition risk. These five additional CPZs are discussed in more detail in Element 6 below. These five additional CPZs increase our total 2021 EVM Scope of Work mileage from 2,522.2 to 2,645.7.⁵

We have expanded the information included in Attachment E to address several specific issues described in more detail below, as well as providing additional information that we thought would be helpful for the Commission, SED, Energy Safety, and interested parties.

Attachment E includes the following information:

- Column 1: Circuit Name
- Column 2: Circuit Protection Zone
- Column 3: Remaining EVM Miles
- Column 4: Forecasted Tree Work
- Column 5: EVM Tree-Weighted Risk Score
- Column 6: EVM Tree-Weighted Risk Rank
- Column 7: EVM Plan (*i.e.*, initial 1,800 mile plan or 2,400 mile plan)
- Column 8: Risk Tranche
- Column 9: Gross Miles Complete and Verified as of 9/30/21 (Audited)
- Column 10: Miles Deducted During Re-patrols as of 9/30/21 (Unaudited)⁶
- Column 11: Net Miles Complete and Verified as of 9/30/21 (Unaudited)
- Column 12: Miles Ready for Work Verification as of 9/30/21 (Unaudited)
- Column 13: Miles Constrained as of 9/30/21 (Unaudited)
- Column 14: Remaining Miles (Unaudited)

⁵ Changes to the CPZs and corresponding mileage in the 2021 EVM Scope of Work do not change the goal in our 2021 Wildfire Mitigation Plan (WMP) of performing 1,800 miles of EVM work by the end of 2021.

⁶ Re-patrols are described in Element 3.e below.

There are five issues related to Attachment E that we wanted to make sure to highlight for the Commission, SED, Energy Safety, and interested parties for clarity.

First, the 2021 EVM Scope of Work includes five additional CPZs that were not identified in the 2021 EVM Scope of Work submitted with the August Report as indicated in Table 2 below:

Table 2: Updated CPZs in 2021 EVM Scope of Work

	2021 EVM Scope of Work (May 6, 2021)	2021 EVM Scope of Work (August 4, 2021)	2021 EVM Scope of Work (November 4, 2021)
Total Risk Ranked CPZs	99	100	105
Total Commitment/Permitting CPZs	0	4	4
Total CPZs in 2021 EVM Scope of Work	99	104	109

In Element 6 below, we explain that these five additional CPZs were added to the 2021 EVM Scope of Work to address ignition risk.

Second, the total mileage in the 2021 EVM Scope of Work provided in the August Report for the 104 CPZs identified was 2,522.2 miles. The mileage in this November Report for the 109 CPZs identified is 2,645.7 miles. The change in mileage is due to the addition of five CPZs. Changes in mileage may also be reflected as we review our records and confirm mileage for a CPZ or if facilities are added or removed.

Third, we are providing information in this November Report that is as of September 30, 2021 because we have not yet completed the audit process for EVM data reported after September 30, 2021. In addition, PG&E’s Internal Audit (IA) department is actively involved in reviewing and validating EVM work in 2021. To provide clarity on the information that has been audited, we have included in the column headers in Attachments E and N the audit status of the information in the column. Additional data will be audited as a part of our validation process and the final number of miles of EVM work completed by December 31, 2021 will be fully audited.

Finally, it is important to note that only EVM miles that have been completed and verified are being included in our mileage totals. In some cases, we have performed work on a portion of a segment within a CPZ but have not completed work on the entire segment because of a constraint(s). In these cases, we have not counted the mileage associated with that segment toward our goal, even though a substantial portion of the segment may have been completed.

b. Carryover Miles

As explained in the Corrective Action Plan and in the August Report, at the beginning of this year we continued to complete the portion of 2020 work that was “in progress” at the end of 2020. In progress miles are miles where the EVM process was started but had not been completed through work verification by the end of the year. We refer to these as carryover miles or carryover work. Although this carryover work falls outside of the CPZs included in the 2021 EVM Scope of Work,⁷ it was performed in High Fire Threat District (HFTD) areas, which is the reason it has been included in the 2021 actuals of EVM work completed as risk was mitigated for these circuits. The 1,282.01 miles of EVM work verified and completed through September 30, 2021 is greater than the 1,198.07 miles work verified and completed on CPZs that are within the 2021 EVM Scope of Work because we are including the carryover miles. In order to provide a comprehensive detailed representation of the EVM work verified and completed to date, we are including as Attachment N a list of the carryover work performed through September 30, 2021 that is outside the CPZs included in the 2021 EVM Scope of Work. Table 3 below summarizes the EVM completed and verified miles through September 30, 2021 that are within the 2021 EVM Scope of Work and those miles performed on CPZs outside the 2021 EVM Scope of Work (*i.e.*, carryover miles).

Table 3: Miles of EVM Work Completed In and Outside 2021 EVM Scope of Work

CPZ Category	November Report Attachment	Miles of EVM Completed and Verified (Through 9/30/2021)
In 2021 EVM Scope of Work	Attachment E	1,198.07
Outside 2021 EVM Scope of Work	Attachment N	83.94 ⁸
Total		1,282.01

c. Constrained Miles

The EVM work miles that we are able to perform can be significantly impacted by constrained miles. Constraints can result from customer refusals, permitting, and land and environmental issues. To date, our collaborative efforts with respective stakeholders has resolved approximately 260 miles⁹ of constraints. However, we continue to experience constraints on

⁷ Corrective Action Plan, p. 23 and August Report, p. 5.

⁸ Please note that 60.67 miles of the 83.94 carryover miles, or 72% of these miles, are in the top 20% of the highest risk areas.

⁹ This number has not been reviewed by PG&E’s IA department.

over 400 miles in the 2021 EVM Scope of Work.¹⁰ While we are working diligently to resolve these constraints, they have had a significant impact on our ability to perform the 2021 EVM Scope of Work.¹¹

d. Major Woody Stem Exemptions

PG&E is currently standing up a team around Major Woody Stem Exemptions. General Order 95, Rule 35 and California Public Resources Code §4293 contain exemptions that allow healthy, mature trees that do not present a risk to public safety to remain closer to high voltage electric conductors than the Minimum Clearance Requirements for vegetation. This is referred to as the Major Woody Stem Exemption. Consistent with these provisions, the EVM program provided an exemption for redwoods and giant sequoias that were within the Minimum Clearance Requirements. We will no longer be allowing this exemption and are currently evaluating the location of each of these trees and developing a workplan. We will continue to provide progress updates as this program matures.

e. Identification of EVM Issues

One of the most important lessons learned from the Corrective Action Plan was the need to constantly evaluate our EVM work and self-identify and resolve issues or concerns regarding execution of the EVM work. This focus on execution rigor has been effective in helping us identify and address issues as they arise in the EVM program. Below, we describe two execution issues that have come to our attention and that we are actively working to resolve or have already resolved.

For context, while each execution issue needs to be addressed, the total number of miles impacted by these two issues is still be evaluated but is relatively small as compared to the more than 1,200 miles of EVM work performed through September 30, 2021. We will continue to focus on execution issues as they arise to quickly address them, perform an extent of condition and constantly improve our EVM program.

(1) EVM Re-patrols

On May 12, 2020, PG&E published EVM Pre-Inspection Procedure, TD-7106P-01, which included guidance regarding overhang clearance. Specifically, Procedure TD-7106P-01 indicates that if vegetation will enter the 4-ft. vertical plane for overhang before the next routine/compliance cycle, the pre-inspector (PI) must prescribe clearance. This is referred to as

¹⁰ See Attachment E, Column 13.

¹¹ To date, approximately 26,000 trees have been worked on 126 constrained miles and approximately 90,000 trees continue to be constrained. These are approximate numbers of trees and miles that have not been reviewed by IA.

encroachment criteria. PG&E interpreted the “next routine/compliance cycle” encroachment criteria to be a twelve (12) month period. In August 2020, PG&E’s EVM Work Verification (WV) team incorrectly indicated to WV inspectors that, for WV purposes, the encroachment criteria should be thirty (30) days for both radial clearance and overhang, rather than the 12 months for overhang prescribed in Procedure TD-7106P-01.

In mid-June 2021, this procedural gap was identified by a Work Verification Manager when evaluating procedural documentation against the 30-day encroachment criteria identified above.¹²

After we identified and evaluated the issue, the following corrective actions were implemented: (1) execution and WV work was suspended, the gap was shared with teams and expectations were reset to follow Procedure TD-7106P-01 in its entirety and to no longer apply the thirty (30) day encroachment criteria for radial clearance and overhang; (2) VM training is currently being updated to include the Procedure TD-7106P-01 requirements; and (3) WV conducted a re-patrol of all completed EVM miles from August 2020 through June 2021 to verify compliance to 4-ft. for both radial and overhang at the time of the re-patrol. In addition, the re-patrol evaluated if the vegetation would grow into the 4-ft. radial and overhang clearance within the next three months and the next six months, respectively, in order to prioritize work for execution. Most of the re-patrol effort has been completed, and except for areas with access constraints, this effort is anticipated to be completed by early December.

In Attachment E we have included in Column 10 information regarding estimated mileages that were removed from the completed and verified 2021 EVM work if, during the re-patrol, PG&E determined that the work had not been performed in accordance with Procedure TD-7106P-01 standards. The total number of miles removed as a result of the re-patrols in the 2021 EVM Scope of Work is 3.52 miles.¹³ In addition, the total number of miles removed as a result of the re-patrols outside the CPZs in the 2021 EVM Scope of Work is 0.98 miles.¹⁴ These removals have been reflected as part of the “Work Verified Miles” in Table 1 above.

(2) Tree Assessment Tool Programming Issue

Our tree assessment tool (TAT) was updated as part of the Version 9 release in the last week of February 2021. The TAT is used by our VM inspection teams to evaluate an individual tree’s

¹² We had not sufficiently quantified the scope and impact of the re-patrol issue when we submitted the August Report and so are addressing it in this report.

¹³ Attachment E, Column 11 reflects the net miles of completed and verified 2021 EVM Scope of Work (*i.e.*, gross completed and verified miles less the miles deducted as a result of the re-patrols).

¹⁴ Attachment N, Column 9 reflects the net miles of completed and verified 2021 EVM work.

likelihood of failing and supplies instruction of whether to abate or not abate the tree.¹⁵ Part of the Version 9 release included an adjustment to the user input fields, which was intended to improve the usability of the tool.

In an October 8, 2021 workshop focused on improving contractor performance and alignment between PI and WV on scope identification, PI and WV team members in the Sierra division identified a misalignment of outcomes of the TAT. Upon further investigation during the week of October 11th, the technology team determined that the TAT did not add the appropriate points for trees that are both conifers and have a lean that is greater than 5 degrees. As a result, vegetation points created since the Version 9 release may have an incorrect TAT score, causing a potentially incorrect determination of ‘do not abate.’

The VM Technology Team estimated approximately 23,000 vegetation points potentially have an incorrect total TAT score, of which 4,060 trees in approximately 112 miles should have resulted in an ‘abate’ instruction. Of the 4,060 trees, 991 (24%) are associated with CPZ segments with a Work Verification Pass status in approximately 31 miles. The remaining 3,069 (76%) are on segments still in progress in approximately 81 miles. We have undertaken the following actions to address this issue:

- **Immediate TAT Update:** On October 10, 2021, the technology teams pushed an updated TAT release to all Pre-Inspection users. All users that did not accept the updated version were blocked and will only be reinstated once they accept the updated version.
- **Vegetation Point Re-Inspection:** WV performed a validation of the 991 trees on passed segments and determined that 450 of the affected trees, or approximately 14.45 miles had been prescribed work and removed. The remaining 541 trees will need additional work prescribed and represent an estimated impact of 16.55 miles.
- **TAT Code Review:** Technology teams have engaged a third party to perform a full-scale code review to ensure no additional calculation errors exist.
- **Release Testing Protocol:** IT will develop a robust change management process for testing the TAT tool prior to future updates to minimize calculation error potential.
- **Stakeholder Engagement:** Teams will continue to conduct daily working sessions with stakeholders from IT, Technology, Execution, and Work Verification. Tracking will continue through the Daily Operating Reviews.

¹⁵ The TAT calculates a tree health score based on inputs added by the user. The resulting tree health scores would then provide a determination of whether to list the tree for work (i.e., abate or remove).

Given the timing of when the TAT programming issue was identified, we were not able to reflect the impact of this issue in the November Report. We will update our 2021 EVM mileage by the end of the year to reflect any adjustments necessary as a result of the TAT programming issue.¹⁶

f. Status of the 2022 EVM Scope of Work

In our Corrective Action Plan, we indicated that we have “a goal to complete the final, WRGSC-approved 2022 EVM Scope of Work in Q4 2021.”¹⁷ We also indicated that “[i]n December 2021, we plan to revise the approved 2022 EVM Scope of Work to account for work that has been completed in 2021, incorporate all the permit delays and customer refusals, and refresh the CPZ listing to ensure focus on the highest risk miles in 1-n ranking approach.”¹⁸

PG&E has developed a preliminary 2022 EVM Scope of work which was reviewed and approved by the WRGSC on October 27, 2021. This Scope of Work will include two tranches of work. The first tranche includes any remaining 2021 EVM Scope of Work that did not have work verification complete by December 31, 2021. The second tranche is the next approximately 2,700 miles of CPZs from the 2021 Tree Weighted Prioritization Risk Model. The 2022 EVM Scope of Work will not include all 2,700 miles, but these miles will be used in determining the target number of miles in our 2022 plan. The target number of miles in our 2022 EVM Scope of Work will be provided in our 2022 WMP.

PG&E has refreshed and updated its 2022 Wildfire Distribution Risk Model (WDRM), referred to as “WDRM V.3” and has previewed the additional functionality and enhancements to this model at the Energy Safety sponsored Risk Modeling Working Group public workshop held on October 5 and 6, 2021. However, we are still in the process of validating WDRM V.3. Because WDRM V.3 is still undergoing validation, we are not using this model to inform the 2022 EVM Scope of Work given the need to establish the 2022 workplan before the end of the year to enable safe and effective work execution in 2022. We are confident in the use of the 2021 EVM Tree Weighted Prioritization method for planning 2022 EVM work having demonstrated its effectiveness during the 2021 year. Once WDRM V.3 is validated and approved by the WRGSC, we will evaluate whether additional CPZs need to be added to the 2022 EVM Scope of Work and will use the established WRGSC process for reviewing and making any changes, similar to the process followed for the changes to the 2021 EVM Scope of Work.

¹⁶ Please note that the miles and tree counts related to the TAT issue have not been reviewed by PG&E’s IA department.

¹⁷ Corrective Action Plan, p. 18.

¹⁸ Corrective Action Plan, p. 18.

4. A description of how the list in item 3 above ensures PG&E is prioritizing the power lines with highest risk first

As we explained in the Corrective Action Plan, “[t]he 2021 EVM Scope of Work is based on the risk-ranked CPZs from the EVM tree-weighted prioritization list.”¹⁹ In Element 3 above, we have provided an updated status of our 2021 EVM work as of September 30, 2021. By the end of the year, based on our 2021 EVM Scope of Work, we plan to have executed EVM work on the highest risk ranked circuits, except where we are unable to do so because of customer refusals, permitting issues, or other external factors that impact our ability to perform EVM work. This approach ensures that PG&E is prioritizing the highest risk ranked CPZs before lower risk ranked CPZs. We will also have performed work related to commitments/permitting, as discussed in Element 6 of the August Report. In addition, a small portion of the 2021 EVM work will have been carried over from 2020. As Table 1 in the Executive Summary indicates, through September 30th approximately 97.2% of our EVM work was performed on the top 20% of risk ranked CPZs.

In the Corrective Action Plan, we described our 1-n ranking approach for prioritizing work to be performed in the 2021 EVM Scope of Work.²⁰ While we are continuing with this approach to the extent feasible, it is important to note that there may be CPZs or segments within CPZs where work cannot be performed because of a constraint. In these cases, EVM work may not be completed in 2021 on all of the CPZs within the top 1,800 miles of our 2021 EVM Scope of Work. This does not change our overall approach to EVM work in 2021, but in some cases the work on a specific CPZ in the 1-n ranking may not be completed until 2022 or later, depending on when the constraint is resolved.

5. A description of PG&E’s decision-making that leads to the list in item 3: how the list is developed, evaluated, revised in terms of projects that are added to or dropped from the list, finalized, and communicated to EVM work crews, and PG&E’s internal documentation of the decision-making process

In Element 5, we provide updated information on: (a) the development and revision of the 2021 EVM Scope of Work; (b) communication with EVM work crews; and (c) internal documentation of decision-making.

¹⁹ Corrective Action Plan, p. 18.

²⁰ Corrective Action Plan, pp. 13-14.

a. Development and Revision of 2021 EVM Scope of Work

In our Corrective Action Plan, we described how the 2021 EVM Scope of Work was developed.²¹ We also described the process for updating the 2021 EVM Scope of Work.²² There are no updates to how the 2021 EVM Scope of Work was developed or the process for revising it. However, as described in Elements 3 and 6, there have been revisions to the 2021 EVM Scope of Work since we submitted the Corrective Action Plan on May 6, 2021 and as updated in the August Report. These changes are described in more detail in Element 6.

b. Communication with EVM Employees and Contractors

A Weekly Operating Review is conducted at the EVM Command Center. This is in conjunction with the Daily Operating Reviews held across Vegetation Management (VM) inclusive of the EVM Program (Daily Operating Reviews are described in more detail below). The EVM Command Center is a key part of the Lean Operating System that PG&E has instituted to allow rapid escalation of issues from local teams to the leadership of the organization and direction from the leadership of the organization back to the local teams.

EVM goals and targets are communicated to teams and individual staff members through daily communication that includes updates regarding EVM work progress and targets. Daily Operating Reviews are held each day at multiple levels within our organization. We have a Daily Operating Review among our officer and leadership team and a Daily Operating Review at the region level with all of our regions represented and attended by the EVM leadership team. At the region-level Daily Operating Review, our field teams and leadership discuss progress with the 2021 EVM Scope of Work. EVM contractors are also included in the region-level Daily Operating Reviews. The purpose of the Daily Operating Reviews is to discuss challenges and counter measures to keep the plan on track. In addition to the Daily Operating Reviews, on August 10, September 29, and October 19, 2021 we held our monthly VM All Hands meetings to review the 2021 EVM Scope of Work, progress, constraints and approved changes to the 2021 Plan.

For communications with our EVM contractors, we have dedicated PG&E EVM personnel who are responsible and accountable for communicating the work to be released. This team manages the scope through completion to ensure it aligns with the 2021 EVM Scope of Work. Based on the direction given by our personnel, contractors are responsible for managing their workforce to complete the work scope per the schedule.

²¹ Corrective Action Plan, pp. 12-15.

²² Corrective Action Plan, pp. 15-17.

c. Internal Documentation of Decision Making

Our August Report described in detail our internal documentation process for decision making. There have been no changes to this process since the August Report was submitted.

6. An explanation of the rationale for any planned EVM work that does not target the power lines with highest risk first

As we explained in our Corrective Action Plan, although the 2021 EVM Scope of Work is based on performing work on the highest risk-ranked CPZs, there is some EVM work that is reasonable and prudent to perform even if it is not the highest risk-ranked work.²³ Between the submission of the August Report and this November Report, there have been five (5) CPZs added to the 2021 EVM Scope of Work to address ignition risk.

Specifically, we initiated a process to modify how vegetation-related ignitions are monitored in order to proactively identify and evaluate CPZs for potential inclusion in the 2021 EVM Scope of Work. The use of vegetation-related ignition data was intended to:

- Better identify ignition failure causes and inform wildfire safety priorities;
- Generate corrective actions based on real-time learnings; and,
- Obtain better data and new insights on developing trends.

We used a five step process to identify CPZs for inclusion into the 2021 EVM Scope of Work, which asked or addressed the following:

1. Did the CPZ have a vegetation-related ignition?
2. Is the CPZ in the top 20% of risk ranked CPZs and currently outside of the 2021 EVM Scope of Work?
3. What was the assessment by the Public Safety Specialist (PSS) for the CPZ where the ignition occurred²⁴?
4. Did the VM extent of condition patrol indicate additional risk within that CPZ?

²³ Corrective Action Plan, pp. 18-19.

²⁴ Public Safety Specialists used their significant experience from fire services to inform the assessment of the Fire Fighting resources difficulty to access the area given an ignition start on the circuit and terrain that could make suppression a challenge.

5. Based on the answers to the questions above, develop a recommendation to reprioritize the CPZ and seek WRGSC approval to add the CPZ to the 2021 EVM Scope of Work.

As a result of this effort, and based on the criteria above, five CPZs have been added to the 2021 EVM Scope of Work. These additional CPZs are identified in Table 4 below:

Table 4: CPZs Added to 2021 EVM Scope of Work As A Result of Ignitions

Project	Region	Risk Tranche	Description of Ignition CPZ
El Dorado PH 2101 El Dorado PH 210126000	Sierra	Top 10%	A vegetation caused ignition occurred on the CPZ on 1/19/2021. In addition to being identified circuit by a PSS, an Extent of Condition Patrol was conducted the first week of August and 3 Pines were identified as Priority 2 trees and require short term action.
Girvan 1102 Girvan 11021028	North Valley	Top 10%	A vegetation caused ignition occurred on 1/27/2021. In addition to being identified circuit by a PSS, during an Extent of Condition Patrol two Grey Pines were identified which require long term action.
Columbia Hill 1101 Columbia Hill 1101circuit_breaker	Sierra	Top 20%	A suspected vegetation caused ignition occurred on 6/18/2021. In addition to being identified circuit by a PSS, in reviewing ignition data from 2014-2020, four other ignitions due to vegetation have occurred on Columbia Hill 1101.
Geyserville 1101 Geyserville 110137454	Sonoma	Top 20%	A vegetation caused ignition occurred on 5/19/2021. In addition to being identified circuit by a PSS, during an Extent of Condition Patrol 14 trees were identified as Priority trees requiring short term action.
Brunswick 1103 Brunswick 110350070	Sierra	Top 20%	A vegetation caused ignition occurred on 1/19/2021. In addition to being identified by a PSS circuit, an Extent of Condition Patrol conducted in early August identified 3 Priority 2 Pines requiring short term action.

7. Any changes to the 2021 Wildfire Distribution Risk Model, the Wildfire Consequence Model, or the Vegetation Risk Model occurring over the prior 90 days or planned for the subsequent 90 days

In the past 90 days, we did not make any changes to the 2021 WDRM, Wildfire Consequence Model, or Vegetation Risk Model for purposes of the 2021 EVM Scope of Work or informing EVM work in 2021. We do not plan on making any changes to these models in the next 90 days.

PG&E discusses the approach for developing the 2022 EVM Scope of Work in Element 3.f above. In summary, while PG&E has updated its WDRM for 2022, in an effort to maintain operational stability and consistency, no changes have been implemented in the development of the 2022 EVM Scope of Work based on WDRM v.3 (*i.e.*, the 2022 WDRM).

8. A detailed description of the circumstances that contributed to PG&E management's inconsistent reporting on the details of its risk modeling and risk ranking lists

We do not have any updated information to provide regarding this Element.

9. Verification by a senior officer of PG&E that the risk model, including underlying data sets and vegetation management records, it is using to prioritize EVM is as set forth in its report

We are providing an updated version of Attachment J, which was the verification included in the Corrective Action Plan, with this November Report.

10. Verification by a senior officer of PG&E that it will target a substantial majority of EVM to the highest risk circuit protection zones first, as shown by its risk model or other ranking, in the next 90 days for EVM

We are providing an updated version of Attachment J, which was the verification included in the Corrective Action Plan, with this November Report.

11. Verification by a senior officer of PG&E that it targeted a substantial majority of EVM to the highest risk circuit protection zones first, as shown by its risk model or other ranking, in the prior 90 days

We are providing an updated version of Attachment J, which was the verification included in the Corrective Action Plan, with this November Report.

- 12. Verification by a senior officer of PG&E that the company has communicated information and internal decisions in items 3, 4 and 9 above to personnel of PG&E's EVM programs and that such personnel is aware of where to target EVM in the subsequent 90 days**

We are providing an updated version of Attachment J, which was the verification included in the Corrective Action Plan, with this November Report.

- 13. A proposed timeline for ending the required reporting, with a detailed explanation of why the proposal ensures PG&E is in compliance with the requirement that it prioritize high risk circuits in its EVM work. The timeline shall include milestone goals for June 1, 2021, September 1, 2021, and December 31, 2021. These goals shall include a targeted percentage of high-risk power line circuits to be completed by those dates.**

We are not making any changes to our proposal that the reporting related to EVM performance end in February 2022.²⁵

With regard to our Corrective Action Plan goals, our goal was to complete 210 high risk miles by June 1, 2021, 850 high risk miles by September 1, 2021, and 1,800 miles by December 31, 2021.²⁶ However, as we discussed above in Element 3 and Table 3, approximately 84 miles of EVM work performed in 2021 was the result of planning that occurred in 2020 before we finalized the 2021 EVM Scope of Work. Given that this work was in HFTD areas and reduced vegetation ignition risk, we are including these miles toward our 1,800 mile goal. Table 5 below is revised from the August Report and provides an update on our 2021 EVM goals to include the early 2021 miles.

²⁵ Corrective Action Plan, pp. 24-25.

²⁶ High risk miles are defined as the top 20% of CPZs based on risk ranking from the EVM tree-weighted prioritization list and fire impacted miles.

Revised Table 5: Update on Goals for EVM Work in 2021²⁷

Date	Corrective Action Plan Goal (Miles)	Corrective Action Plan Goal for Percentage Completion²⁸	Actual Miles	Actual Percentage Completion
June 1, 2021	210	11%	414.9 ²⁹	23%
September 1, 2021	850	47%	1,034.1 ³⁰	57%
December 31, 2021	1,800	100%	-	-

14. A description of how the Corrective Action Plan proposed in response to this Resolution will complement and not undermine PG&E’s compliance activities ordered in the D.20-05-019

We do not have any updated information to provide regarding this Element.

CONCLUSION

This November Update provides an overview of events which have occurred since we submitted the August Update. We appreciate the opportunity to provide these updated materials to the Commission, SED, Energy Safety, and interested parties and look forward to receiving continued feedback on our approach to focusing the EVM program on the highest risk CPZs in our service territory.

²⁷ Please also note that the exact mileage of EVM work completed and verified by September 1, 2021 may change based on the MWS and TAT issues discussed in Element 3 above.

²⁸ Percentage completion is based on a goal of approximately 1,800 miles of EVM work performed by the end of 2021.

²⁹ The miles differ from the August Report because it includes all of the EVM work performed in 2021 that has been completed and verified as of June 1, 2021.

³⁰ The miles provided in this November Report reflect all EVM work performed in 2021 that has been completed and verified as of September 1, 2021.

ATTACHMENT E
Updated 2021 Enhanced Vegetation Management Scope of Work

Column 1: Circuit Name	Column 2: Circuit Protection Zone	Column 3: Remaining EVM Miles	Column 4: Forecasted Tree Work	Column 5: EVM Tree-Weighted Risk Score	Column 6: EVM Tree-Weighted Risk Rank	Column 7: EVM Plan (Mile Cutoff)	Column 8: Risk Tranche	Column 9: Gross Miles Complete and Verified as of 9/30/21 (Audited)	Column 10: Miles Deducted During Repatrols as of 9/30/21 (Unaudited)	Column 11: Net Miles Complete and Verified as of 9/30/21 (Unaudited)	Column 12: Miles Ready for Work Verification as of 9/30/21 (Unaudited)	Column 13: Miles Constrained as of 9/30/21 (Unaudited)	Column 14: Remaining Miles (Unaudited)
ANTLER 1101	ANTLER 11011378	24.27	2949	54.01	65	1800 MILE	1. <= 10%	1.09	0.00	1.09	0.00	4.22	18.96
APPLE HILL 2102	APPLE HILL 21021532	37.07	3570	56.04	60	1800 MILE	1. <= 10%	6.57	0.00	6.57	0.44	10.87	19.20
APPLE HILL 2102	APPLE HILL 2102circuit_breaker	38.41	4582	175.16	2	1800 MILE	1. <= 10%	19.80	0.04	19.76	0.24	6.41	11.99
AUBERRY 1101	AUBERRY 1101R2578	42.35	1543	99.46	18	1800 MILE	1. <= 10%	34.22	0.00	34.22	0.00	2.66	5.47
AUBERRY 1102	AUBERRY 1102circuit_breaker	33.25	517	65.71	44	1800 MILE	1. <= 10%	26.73	0.00	26.73	0.50	3.16	2.86
AUBERRY 1102	AUBERRY 1102R2850	26.34	405	42.15	100	2400 MILE	1. <= 10%	2.90	0.00	2.90	0.46	0.63	22.34
BANGOR 1101	BANGOR 11017446	28.47	4061	103.42	14	1800 MILE	1. <= 10%	22.32	0.20	22.13	0.10	2.50	3.73
BELL 1107	BELL 11072400	10.05	800	69.05	38	1800 MILE	1. <= 10%	8.18	0.03	8.15	0.14	1.78	0.00
BELL 1107	BELL 110750172	5.45	377	41.29	103	2400 MILE	1. <= 10%	4.74	0.06	4.68	0.00	0.60	0.18
BELL 1108	BELL 11082202	29.43	892	63.87	47	1800 MILE	1. <= 10%	21.89	0.03	21.86	0.66	1.71	5.21
BIG BEND 1102	BIG BEND 11021972	21.06	4538	122.68	7	1800 MILE	1. <= 10%	1.02	0.00	1.02	0.04	0.94	19.06
BRIDGEVILLE 1102	BRIDGEVILLE 1102circuit_breaker	25.27	2534	84.19	26	1800 MILE	1. <= 10%	9.39	0.00	9.39	0.36	3.87	11.65
BROWNS VALLEY 1101	BROWNS VALLEY 110193870	20.83	565	55.08	64	1800 MILE	1. <= 10%	17.37	0.02	17.36	0.00	0.15	3.33
BRUNSWICK 1103	BRUNSWICK 110350070	26.79	4859	6.66	531	2400 MILE	2. >10 - 20%	0.00	0.00	0.00	0.00	0.00	26.79
CALISTOGA 1101	CALISTOGA 1101734	6.58	852	45.87	87	2400 MILE	1. <= 10%	0.40	0.01	0.39	0.00	3.57	2.63
CEDAR CREEK 1101	CEDAR CREEK 11011608	32.90	2931	71.51	37	1800 MILE	1. <= 10%	11.22	0.00	11.22	0.60	8.88	12.21
CEDAR CREEK 1101	CEDAR CREEK 11011656	31.31	4190	79.01	30	1800 MILE	1. <= 10%	5.07	0.00	5.07	0.32	17.64	8.28
CEDAR CREEK 1101	CEDAR CREEK 11011664	28.93	2298	90.07	22	1800 MILE	1. <= 10%	11.75	0.00	11.75	0.30	10.77	6.11
CHALLENGE 1102	CHALLENGE 11021064	20.30	3727	105.13	13	1800 MILE	1. <= 10%	3.24	0.00	3.24	0.07	5.22	11.78
CHALLENGE 1102	CHALLENGE 1102circuit_breaker	14.67	3651	53.45	66	1800 MILE	1. <= 10%	1.03	0.00	1.03	0.14	6.58	6.92
COARSEGOLD 2103	COARSEGOLD 210310820	27.60	468	56.49	59	1800 MILE	1. <= 10%	26.27	0.00	26.27	0.00	0.73	0.59
COLUMBIA HILL 1101	COLUMBIA HILL 1101circuit_breaker	38.76	3783	8.36	467	2400 MILE	2. >10 - 20%	0.00	0.00	0.00	0.00	0.00	38.76
COTTONWOOD 1101	COTTONWOOD 11011610	36.98	1027	47.08	82	2400 MILE	1. <= 10%	8.59	0.00	8.59	0.34	6.00	22.05
COTTONWOOD 1101	COTTONWOOD 110168190	23.87	603	58.36	56	1800 MILE	1. <= 10%	8.32	0.00	8.32	0.00	6.53	9.01
COTTONWOOD 1102	COTTONWOOD 11021578	29.49	1137	49.54	73	1800 MILE	1. <= 10%	7.55	0.00	7.55	0.33	9.88	11.73
DESCHUTES 1101	DESCHUTES 11011380	17.28	493	45.46	88	2400 MILE	1. <= 10%	7.23	0.00	7.23	0.31	4.97	4.77
DESCHUTES 1101	DESCHUTES 11011580	45.36	2608	115.48	9	1800 MILE	1. <= 10%	32.31	0.00	32.30	0.09	4.34	8.62
DESCHUTES 1104	DESCHUTES 11041370	14.73	482	119.37	8	1800 MILE	1. <= 10%	11.11	0.04	11.07	0.00	1.29	2.37
DESCHUTES 1104	DESCHUTES 110449024	16.03	274	65.93	43	1800 MILE	1. <= 10%	12.62	0.00	12.62	0.08	1.70	1.63
DESCHUTES 1104	DESCHUTES 11049718	20.59	422	60.54	54	1800 MILE	1. <= 10%	8.71	0.00	8.71	0.00	4.86	7.02
DESCHUTES 1104	DESCHUTES 11049726	14.64	255	48.68	77	2400 MILE	1. <= 10%	12.42	0.00	12.42	0.00	0.89	1.33
DESCHUTES 1104	DESCHUTES 1104circuit_breaker	12.88	275	47.06	83	2400 MILE	1. <= 10%	10.21	0.00	10.21	0.00	1.05	1.62
DIAMOND SPRINGS 1105	DIAMOND SPRINGS 110519910	19.31	547	43.15	94	2400 MILE	1. <= 10%	1.58	0.00	1.58	0.71	1.82	15.20
DIAMOND SPRINGS 1105	DIAMOND SPRINGS 11052102	35.12	1931	88.19	25	1800 MILE	1. <= 10%	17.07	0.00	17.07	0.60	6.00	11.46
DIAMOND SPRINGS 1105	DIAMOND SPRINGS 11057722	47.85	2812	108.10	11	1800 MILE	1. <= 10%	44.71	0.16	44.55	0.24	7.59	0.00
DOBBINS 1101	DOBBINS 11011264	35.61	3459	42.85	96	2400 MILE	1. <= 10%	0.79	0.00	0.79	0.07	0.56	34.20
EL DORADO PH 2101	EL DORADO PH 210126000	33.16	7802	39.29	116	2400 MILE	1. <= 10%	0.00	0.00	0.00	0.00	0.00	33.16
ELK CREEK 1101	ELK CREEK 11012106	13.25	419	42.98	95	2400 MILE	1. <= 10%	3.53	0.00	3.53	0.26	0.56	8.91
FITCH MOUNTAIN 1113	FITCH MOUNTAIN 11136751	20.60	3311	78.26	31	1800 MILE	1. <= 10%	3.38	0.04	3.34	0.14	12.24	4.88
FORT SEWARD 1121	FORT SEWARD 11211690	10.43	1715	153.25	3	1800 MILE	1. <= 10%	5.38	0.36	5.03	0.00	1.40	4.00
FRUITLAND 1142	FRUITLAND 114263170	11.76	2046	44.77	90	2400 MILE	1. <= 10%	0.00	0.00	0.00	0.00	0.18	11.58
FRUITLAND 1142	FRUITLAND 114293234	10.69	1938	66.00	42	1800 MILE	1. <= 10%	0.32	0.00	0.32	0.00	4.69	5.69
GARBERVILLE 1102	GARBERVILLE 11024744	17.05	1491	46.69	85	2400 MILE	1. <= 10%	2.80	0.00	2.80	0.31	5.39	8.55
GARBERVILLE 1102	GARBERVILLE 110256048	4.84	2568	79.70	29	1800 MILE	1. <= 10%	0.59	0.01	0.58	0.00	0.60	3.66
GEYSERVILLE 1101	GEYSERVILLE 1101166	11.13	1016	62.20	50	1800 MILE	1. <= 10%	4.82	0.10	4.72	0.09	1.96	4.35
GEYSERVILLE 1101	GEYSERVILLE 110137454	6.37	374	8.31	470	2400 MILE	2. >10 - 20%	1.00	0.00	1.00	0.11	1.95	3.31
GIRVAN 1101	GIRVAN 11011330	30.57	1828	42.57	97	1800 MILE	1. <= 10%	9.54	0.00	9.54	0.17	8.60	12.25
GIRVAN 1101	GIRVAN 1101323094	35.31	1389	55.66	61	1800 MILE	1. <= 10%	17.05	0.00	17.05	0.00	2.19	16.07
GIRVAN 1102	GIRVAN 11021028	18.44	843	13.41	317	2400 MILE	1. <= 10%	0.00	0.00	0.00	0.00	0.00	18.44
GRASS VALLEY 1103	GRASS VALLEY 11032180	44.19	2408	48.35	78	2400 MILE	1. <= 10%	23.28	0.00	23.28	0.18	8.37	12.37
HIGGINS 1109	HIGGINS 110950072	50.94	2058	109.83	10	1800 MILE	1. <= 10%	25.91	0.00	25.91	1.25	8.75	15.03
HIGGINS 1109	HIGGINS 110950078	46.97	845	47.47	79	2400 MILE	1. <= 10%	35.09	0.00	35.09	1.11	0.89	9.88
HIGGINS 1109	HIGGINS 1109circuit_breaker	26.34	1247	82.50	27	1800 MILE	1. <= 10%	20.51	0.00	20.51	0.17	2.64	3.01
HOOPA 1101	HOOPA 11013174	17.96	2544	47.27	80	2400 MILE	1. <= 10%	1.39	0.00	1.39	0.00	12.09	4.48
HOOPA 1101	HOOPA 11013290	12.86	1553	52.56	68	1800 MILE	1. <= 10%	1.30	0.00	1.30	0.00	8.44	3.12
KANAKA 1101	KANAKA 110165606	12.84	3195	51.40	70	1800 MILE	1. <= 10%	0.44	0.00	0.44	0.40	6.81	5.19
LAS GALLINAS A 1105	LAS GALLINAS A 110599904	5.44	739	48.84	75	1800 MILE	1. <= 10%	1.36	0.00	1.36	0.11	1.71	2.26
LAYTONVILLE 1102	LAYTONVILLE 110237586	13.88	1272	52.81	67	1800 MILE	1. <= 10%	2.59	0.00	2.59	0.00	4.26	7.03
LAYTONVILLE 1102	LAYTONVILLE 1102500	14.71	1703	74.61	33	1800 MILE	1. <= 10%	3.24	0.09	3.14	0.44	1.70	9.44

Column 1: Circuit Name	Column 2: Circuit Protection Zone	Column 3: Remaining EVM Miles	Column 4: Forecasted Tree Work	Column 5: EVM Tree-Weighted Risk Score	Column 6: EVM Tree-Weighted Risk Rank	Column 7: EVM Plan (Mile Cutoff)	Column 8: Risk Tranche	Column 9: Gross Miles Complete and Verified as of 9/30/21 (Audited)	Column 10: Miles Deducted During Repatrols as of 9/30/21 (Unaudited)	Column 11: Net Miles Complete and Verified as of 9/30/21 (Unaudited)	Column 12: Miles Ready for Work Verification as of 9/30/21 (Unaudited)	Column 13: Miles Constrained as of 9/30/21 (Unaudited)	Column 14: Remaining Miles (Unaudited)
LAYTONVILLE 1102	LAYTONVILLE 1102572	20.62	2695	55.53	62	1800 MILE	1. <= 10%	1.52	0.00	1.52	0.16	8.43	10.51
LINCOLN 1104	LINCOLN 11042070	20.61	603	50.50	71	1800 MILE	1. <= 10%	14.57	0.00	14.57	0.00	1.74	4.30
MARIPOSA 2102	MARIPOSA 210210880	39.25	902	101.36	16	1800 MILE	1. <= 10%	33.75	0.13	33.62	0.00	1.55	4.08
MARIPOSA 2102	MARIPOSA 210237282	52.14	1213	60.81	53	1800 MILE	1. <= 10%	26.51	0.22	26.29	0.74	3.30	21.81
MARIPOSA 2102	MARIPOSA 21029590	35.79	1639	45.03	89	2400 MILE	1. <= 10%	3.80	0.00	3.80	0.52	2.77	28.71
MIDDLETOWN 1101	MIDDLETOWN 1101622	12.05	939	129.25	6	1800 MILE	1. <= 10%	6.47	0.09	6.37	0.00	2.41	3.27
MOUNTAIN QUARRIES 2101	MOUNTAIN QUARRIES 2101circuit_bi	25.84	919	72.73	35	1800 MILE	1. <= 10%	23.32	0.00	23.32	0.00	0.44	2.08
NARROWS 2101	NARROWS 21011202	45.52	1237	46.92	84	2400 MILE	1. <= 10%	8.70	0.00	8.70	0.39	6.12	30.32
OAKHURST 1101	OAKHURST 110110090	31.38	1755	134.58	4	1800 MILE	1. <= 10%	17.84	0.04	17.80	0.16	1.97	11.46
OAKHURST 1101	OAKHURST 11015490	10.50	497	59.47	55	1800 MILE	1. <= 10%	9.46	0.19	9.27	0.12	1.04	0.07
OAKHURST 1103	OAKHURST 110363334	15.27	534	63.94	46	1800 MILE	1. <= 10%	8.84	0.00	8.84	0.02	2.57	3.83
OAKHURST 1103	OAKHURST 1103circuit_breaker	30.21	1548	74.36	34	1800 MILE	1. <= 10%	15.32	0.00	15.32	0.58	1.92	12.38
OREGON TRAIL 1104	OREGON TRAIL 11041574	15.86	629	133.27	5	1800 MILE	1. <= 10%	9.37	0.00	9.37	0.00	3.68	2.81
OREGON TRAIL 1104	OREGON TRAIL 11041634	17.00	444	105.89	12	1800 MILE	1. <= 10%	11.15	0.00	11.15	0.00	3.17	2.68
OREGON TRAIL 1104	OREGON TRAIL 1104circuit_breaker	10.72	660	95.23	20	1800 MILE	1. <= 10%	5.02	0.00	5.02	0.11	3.08	2.51
PENRYN 1103	PENRYN 11032198	16.81	595	48.91	74	1800 MILE	1. <= 10%	13.52	0.00	13.52	0.14	0.65	2.51
PENRYN 1105	PENRYN 11051342	22.49	877	52.37	69	1800 MILE	1. <= 10%	9.87	0.00	9.87	0.48	6.22	5.92
PHILO 1101	PHILO 110137222	24.50	1347	68.46	39	1800 MILE	1. <= 10%	6.10	0.00	6.10	0.41	4.62	13.36
PHILO 1101	PHILO 1101circuit_breaker	32.49	2623	57.81	57	1800 MILE	1. <= 10%	0.00	0.00	0.00	0.00	0.00	32.49
PIKE CITY 1101	PIKE CITY 1101circuit_breaker	19.42	4458	80.99	28	1800 MILE	1. <= 10%	5.90	0.18	5.72	0.50	7.73	5.47
PIKE CITY 1102	PIKE CITY 1102circuit_breaker	9.42	2709	55.33	63	1800 MILE	1. <= 10%	1.21	0.00	1.21	0.02	6.74	1.45
PLACERVILLE 2106	PLACERVILLE 21067522	65.19	6799	48.76	76	1800 MILE	1. <= 10%	25.50	0.00	25.50	1.10	7.68	30.91
PUEBLO 2103	PUEBLO 2103678	34.57	3953	89.85	23	1800 MILE	1. <= 10%	14.94	0.37	14.57	0.56	9.03	10.41
RED BLUFF 1101	RED BLUFF 11011334	39.97	674	77.91	32	1800 MILE	1. <= 10%	29.97	0.00	29.97	0.36	6.49	3.15
RIO DELL 1102	RIO DELL 11024230	22.82	4237	202.04	1	1800 MILE	1. <= 10%	4.56	0.30	4.25	0.19	12.91	5.47
SALMON CREEK 1101	SALMON CREEK 110188998	7.63	523	66.34	41	1800 MILE	1. <= 10%	5.27	0.01	5.26	0.00	1.45	0.93
SAN JOAQUIN NO2 1103	SAN JOAQUIN #2 1103circuit_breaker	67.31	1544	67.24	40	1800 MILE	1. <= 10%	36.05	0.00	36.05	2.10	0.00	29.17
SAN LUIS OBISPO 1107	SAN LUIS OBISPO 1107V60	15.52	655	4.49	650	2400 MILE	3. >20 - 30%	9.39	0.02	9.38	0.08	1.25	4.82
SAND CREEK 1103	SAND CREEK 110345190	36.37	653	43.65	93	2400 MILE	1. <= 10%	25.80	0.00	25.80	2.03	0.68	7.86
SHINGLE SPRINGS 2109	SHINGLE SPRINGS 210913322	40.40	1743	99.59	17	1800 MILE	1. <= 10%	37.67	0.16	37.52	0.00	1.11	1.77
SHINGLE SPRINGS 2109	SHINGLE SPRINGS 21099372	18.60	589	47.13	81	2400 MILE	1. <= 10%	2.28	0.00	2.28	0.00	0.60	15.71
SHINGLE SPRINGS 2110	SHINGLE SPRINGS 21107742	45.20	2518	43.79	92	2400 MILE	1. <= 10%	9.92	0.00	9.92	0.28	9.70	25.30
SILVERADO 2104	SILVERADO 2104632	7.59	742	61.81	52	1800 MILE	1. <= 10%	2.82	0.08	2.74	0.00	1.98	2.87
SILVERADO 2104	SILVERADO 210478268	6.20	692	18.92	243	2400 MILE	1. <= 10%	2.22	0.01	2.21	0.04	1.57	2.38
STILLWATER 1102	STILLWATER 11021644	22.77	906	56.90	58	1800 MILE	1. <= 10%	17.77	0.00	17.77	0.00	2.58	2.43
STILLWATER 1102	STILLWATER 110248952	10.65	501	64.19	45	1800 MILE	1. <= 10%	6.71	0.00	6.71	0.06	1.11	2.78
STILLWATER 1102	STILLWATER 1102circuit_breaker	24.40	1387	89.61	24	1800 MILE	1. <= 10%	17.61	0.05	17.56	0.04	2.19	4.62
TIVY VALLEY 1107	TIVY VALLEY 1107R1817	14.59	813	42.38	99	2400 MILE	1. <= 10%	12.22	0.00	12.22	0.00	0.46	1.91
UKIAH 1111	UKIAH 1111534	18.28	1146	91.00	21	1800 MILE	1. <= 10%	13.45	0.04	13.40	0.42	1.61	2.85
VACA DIXON 1105	VACA DIXON 110540092	24.46	418	102.39	15	1800 MILE	1. <= 10%	20.83	0.00	20.83	0.00	1.86	1.77
VACAVILLE 1108	VACAVILLE 110838316	16.58	404	72.26	36	1800 MILE	1. <= 10%	14.68	0.00	14.68	0.00	0.66	1.24
VOLTA 1101	VOLTA 110180454	32.11	2042	42.57	98	2400 MILE	1. <= 10%	4.76	0.00	4.76	0.58	5.25	21.52
WILLITS 1103	WILLITS 110391810	27.13	3746	62.65	49	1800 MILE	1. <= 10%	10.94	0.12	10.82	0.50	5.27	10.55
WISE 1102	WISE 11022054	13.39	355	44.54	91	2400 MILE	1. <= 10%	4.47	0.00	4.47	0.37	1.63	6.92
WISE 1102	WISE 11022230	23.89	705	97.20	19	1800 MILE	1. <= 10%	19.91	0.25	19.66	0.18	1.37	2.68
WISHON 1101	WISHON 1101circuit_breaker	5.31	317	2.47	827	2400 MILE	3. >20 - 30%	3.00	0.00	3.00	0.00	0.00	2.31
WOODSIDE 1101	WOODSIDE 11018974	11.55	4188	62.16	51	1800 MILE	1. <= 10%	3.22	0.06	3.16	0.04	7.14	1.21
WYANDOTTE 1103	WYANDOTTE 11031974	23.01	4221	49.63	72	1800 MILE	1. <= 10%	0.88	0.00	0.88	0.00	1.32	20.81
WYANDOTTE 1109	WYANDOTTE 110979932	21.15	631	63.48	48	1800 MILE	1. <= 10%	17.50	0.00	17.50	0.41	0.47	2.77
ZACA 1102	ZACA 1102Y54	31.63	421	46.13	86	2400 MILE	1. <= 10%	13.09	0.00	13.09	0.46	2.49	15.59
Total		2645.72						1201.58	3.52	1198.07	26.01	405.75	1020.44

Note: "As part of EVM's process, a circuit segment categorized as completed (work verified), may revert to an in-progress status if a new vegetation point (tree) is associated with a circuit segment after the work verification was completed. If this were to occur, miles associated with this circuit segment will not be recognized as complete until work verification has been re-performed. This condition could cause progress which was recognized in one quarter to not be recognized in a subsequent quarter."

ATTACHMENT J
Updated Verification of Sumeet Singh

Verification of Sumeet Singh

1. I, Sumeet Singh, am submitting this verification as a part of Pacific Gas and Electric Company's (PG&E) 90-Day Report submitted on November 2, 2021 (November Report). Below, I address the Elements of the November Report that require an officer verification.

2. I am currently employed by PG&E as a Senior Vice President and the Chief Risk Officer. I make this verification based on my own personal knowledge and/or based on information provided to me by other PG&E employees who have responsibility over the specific areas identified or responsibility for verifying and validating information. Where I am relying on information provided by other PG&E employees, I state that my understanding is based on information and belief.

3. Element 9 requires a "verification by a senior officer of PG&E that the risk model, including underlying data sets and vegetation management records, it is using to prioritize [Enhanced Vegetation Management (EVM)] is as set forth in its report." I provided a verification for Element 9 with the Corrective Action Plan submitted on May 6, 2021 and in the 90-Day Report submitted on August 4, 2021 (August Report). As indicated in Element 7 of the November Report, "[w]e did not make any changes to the 2021 WDRM, Wildfire Consequence Model, or Vegetation Risk Model for purposes of the 2021 EVM Scope of Work or informing EVM work in 2021. We do not plan on making any changes to these models in the next 90 days."

4. Element 10 requires a "verification by a senior officer of PG&E that it will target a substantial majority of EVM to the highest risk circuit protection zones first, as shown by its risk model or other ranking, in the next 90 days for EVM." In the next 90 days, PG&E will use the 2021 EVM Scope of Work described and included in the November Report to perform EVM work through December 31, 2021. As explained in Elements 2-4 of the Corrective Action Plan, the 2021 EVM Scope of Work utilizes a risk-ranked list of Circuit Protection Zones (CPZs) to prioritize the highest risk CPZs and perform work on these CPZs using the 1-n risk ranking approach, to the extent feasible, described in Element 3(a). The 2021 EVM Scope of Work can be modified by the Wildfire Risk Governance Steering Committee (WRGSC) to account for external circumstances such as delays in the permitting process, customer refusals, and changes in work resulting from wildfires that have required us to modify our workplans. In addition, PG&E has modified the 2021 EVM Scope of Work to include CPZs based on 2021 vegetation-related ignition data, as described in Element 6 of the November Report. Finally, the next 90 days also includes January 2022. Our current plan for the 2022 EVM Scope of Work is described in Element 3.b of the November Report. Similar to the 2021 EVM Scope of Work, the workplan for 2022 focuses a substantial majority of EVM work on the highest risk CPZs.

5. Element 11 requires a “verification by a senior officer of PG&E that it targeted a substantial majority of EVM to the highest risk circuit protection zones first, as shown by its risk model or other ranking, in the prior 90 days.” In the prior 90 days, PG&E targeted EVM work based on the 2021 EVM Scope of Work. The EVM work that has been performed through September 30, 2021 is reflected in Attachment E to the November Report. The information in Attachment E was provided by our Vegetation Management team. In addition, some of the information in Attachment E has been reviewed by our Internal Audit organization. The information that Internal Audit has reviewed is designated as “audited.”

6. Element 12 requires a “verification by a senior officer of PG&E that the company has communicated information and internal decisions in items 3, 4 and 9 above to personnel of PG&E’s EVM programs and that such personnel is aware of where to target EVM in the subsequent 90 days.” On information and belief, Element 5.b in the November Report describes the communications that PG&E has had with EVM personnel and contractors regarding EVM work in 2021, as well as plans for ongoing communications.

I verify that the statements above are true and correct to the best of my knowledge or, where indicated, on information and belief. This verification was executed in San Ramon, California on November 2, 2021.



Sumeet Singh
Pacific Gas and Electric Company
Senior Vice President and Chief Risk Officer

ATTACHMENT N
2021 EVM Work Performed Outside the 2021 EVM Scope of Work

Column 1: Circuit Name	Column 2: Circuit Protection Zone	Column 3: Tree Weighted Risk Score	Column 4: Tree Weighted Rank	Column 5: Plan (Mile Cutoff)	Column 6: Risk Tranche	Column 7: Gross Miles Complete and Verified as of 9/30/21 (Audited)	Column 8: Miles Deducted due to Failures Identified during Repatrols as of 9/30/21 (Unaudited)	Column 9: Net Miles Complete and Verified as of 9/30/21 (Unaudited)	Column 10: Miles Ready for Work Verification as of 9/30/21 (Unaudited)
SAN JOAQUIN NO2 1103	SAN JOAQUIN #2 110310320	40.84	104	n/a	1. <= 10%	3.22	0.27	2.95	2.88
KONOCI 1102	KONOCI 1102circuit_breaker	40.10	108	n/a	1. <= 10%	0.04	0.00	0.04	0.00
WILLITS 1103	WILLITS 1103826	39.92	110	n/a	1. <= 10%	0.12	0.00	0.12	0.14
WILLITS 1102	WILLITS 1102circuit_breaker	39.36	114	n/a	1. <= 10%	1.26	0.00	1.26	0.00
WOODSIDE 1101	WOODSIDE 11018884	38.87	119	n/a	1. <= 10%	0.00	0.00	0.00	0.00
WISE 1102	WISE 1102307494	38.74	121	n/a	1. <= 10%	0.68	0.00	0.68	0.11
CALISTOGA 1101	CALISTOGA 1101736	38.05	125	n/a	1. <= 10%	0.42	0.07	0.35	0.11
SHINGLE SPRINGS 2109	SHINGLE SPRINGS 210912392	37.83	127	n/a	1. <= 10%	8.26	0.00	8.26	0.46
WYANDOTTE 1109	WYANDOTTE 110913052	34.00	137	n/a	1. <= 10%	2.03	0.00	2.03	0.23
DESCHUTES 1104	DESCHUTES 11041582	32.37	145	n/a	1. <= 10%	0.09	0.00	0.09	0.04
WISE 1102	WISE 1102697216	27.78	172	n/a	1. <= 10%	0.16	0.00	0.16	0.16
BROWNS VALLEY 1101	BROWNS VALLEY 11011268	27.43	175	n/a	1. <= 10%	2.63	0.00	2.63	0.31
TIVY VALLEY 1107	TIVY VALLEY 1107584840	26.72	180	n/a	1. <= 10%	12.83	0.05	12.78	0.93
CALISTOGA 1101	CALISTOGA 110189150	26.24	184	n/a	1. <= 10%	0.05	0.00	0.05	0.00
CEDAR CREEK 1101	CEDAR CREEK 1101circuit_breaker	24.23	199	n/a	1. <= 10%	0.32	0.00	0.32	0.20
LINCOLN 1104	LINCOLN 110451756	23.61	202	n/a	1. <= 10%	9.02	0.00	9.02	0.25
MARIPOSA 2101	MARIPOSA 21019400	22.86	211	n/a	1. <= 10%	0.13	0.00	0.13	0.00
MOUNTAIN QUARRIES 210	MOUNTAIN QUARRIES 21011102	21.93	219	n/a	1. <= 10%	0.12	0.00	0.12	0.07
SHINGLE SPRINGS 2109	SHINGLE SPRINGS 210961892	20.18	232	n/a	1. <= 10%	0.12	0.00	0.12	0.00
SAND CREEK 1103	SAND CREEK 11037420	19.58	237	n/a	1. <= 10%	0.17	0.00	0.17	0.35
AUBERRY 1101	AUBERRY 1101R314	19.03	241	n/a	1. <= 10%	0.16	0.00	0.16	0.23
BELL 1108	BELL 11085703	17.38	261	n/a	1. <= 10%	0.00	0.00	0.00	0.27
GRASS VALLEY 1103	GRASS VALLEY 11032110	17.37	263	n/a	1. <= 10%	0.69	0.00	0.69	0.22
MIDDLETOWN 1101	MIDDLETOWN 1101548	17.25	265	n/a	1. <= 10%	0.03	0.00	0.03	0.00
SILVERADO 2104	SILVERADO 210437632	16.23	281	n/a	1. <= 10%	0.05	0.00	0.05	0.05
KONOCI 1102	KONOCI 110275382	15.86	283	n/a	1. <= 10%	0.08	0.00	0.08	0.00
CALISTOGA 1101	CALISTOGA 110143924	15.22	288	n/a	1. <= 10%	0.00	0.00	0.00	0.00
MOUNTAIN QUARRIES 210	MOUNTAIN QUARRIES 21016953	15.16	289	n/a	1. <= 10%	0.44	0.00	0.44	0.00
KONOCI 1102	KONOCI 110264664	14.64	296	n/a	1. <= 10%	0.12	0.00	0.12	0.00
HIGGINS 1109	HIGGINS 1109594	14.10	306	n/a	1. <= 10%	0.12	0.00	0.12	0.19
AUBERRY 1101	AUBERRY 1101R2579	13.29	321	n/a	1. <= 10%	0.60	0.00	0.60	0.84
MORGAN HILL 2105	MORGAN HILL 2105XR176	12.32	338	n/a	2. >10 - 20%	0.12	0.00	0.12	0.00
TIVY VALLEY 1107	TIVY VALLEY 1107869946	12.21	341	n/a	2. >10 - 20%	10.06	0.00	10.06	0.00
WYANDOTTE 1109	WYANDOTTE 11091520	11.84	349	n/a	2. >10 - 20%	0.00	0.00	0.00	0.00
SHINGLE SPRINGS 2109	SHINGLE SPRINGS 21092679	11.50	359	n/a	2. >10 - 20%	0.29	0.00	0.29	0.00
WYANDOTTE 1109	WYANDOTTE 11095607	11.37	361	n/a	2. >10 - 20%	0.01	0.00	0.01	0.13
OAKHURST 1103	OAKHURST 110310570	11.13	369	n/a	2. >10 - 20%	0.00	0.00	0.00	0.00
OAKHURST 1103	OAKHURST 11035480	10.70	383	n/a	2. >10 - 20%	0.38	0.00	0.38	0.14
WYANDOTTE 1107	WYANDOTTE 11071026	10.23	400	n/a	2. >10 - 20%	0.00	0.00	0.00	0.00
OREGON TRAIL 1103	OREGON TRAIL 110335002	10.12	402	n/a	2. >10 - 20%	0.37	0.00	0.37	0.00
FORT SEWARD 1121	FORT SEWARD 1121circuit_breaker	9.70	413	n/a	2. >10 - 20%	0.29	0.00	0.29	0.00
BANGOR 1101	BANGOR 11011804	9.09	429	n/a	2. >10 - 20%	0.06	0.00	0.06	0.00
MIDDLETOWN 1101	MIDDLETOWN 1101circuit_breaker	9.09	430	n/a	2. >10 - 20%	0.73	0.00	0.73	0.00
MIDDLETOWN 1101	MIDDLETOWN 110148212	8.95	436	n/a	2. >10 - 20%	0.59	0.06	0.53	0.00

Column 1: Circuit Name	Column 2: Circuit Protection Zone	Column 3: Tree Weighted Risk Score	Column 4: Tree Weighted Rank	Column 5: Plan (Mile Cutoff)	Column 6: Risk Tranche	Column 7: Gross Miles Complete and Verified as of 9/30/21 (Audited)	Column 8: Miles Deducted due to Failures Identified during Repatrols as of 9/30/21 (Unaudited)	Column 9: Net Miles Complete and Verified as of 9/30/21 (Unaudited)	Column 10: Miles Ready for Work Verification as of 9/30/21 (Unaudited)
WISE 1102	WISE 11022234	8.77	446 n/a	2. >10 - 20%	0.00	0.00	0.00	0.00	0.26
MORGAN HILL 2105	MORGAN HILL 2105XR564	8.40	465 n/a	2. >10 - 20%	2.04	0.00	2.04	0.32	
SILVERADO 2104	SILVERADO 2104806	8.31	469 n/a	2. >10 - 20%	0.00	0.00	0.00	0.00	
WILLITS 1103	WILLITS 110337504	7.64	496 n/a	2. >10 - 20%	0.01	0.00	0.01	0.00	
AUBERRY 1101	AUBERRY 1101R2839	7.47	501 n/a	2. >10 - 20%	0.04	0.00	0.04	0.25	
NARROWS 2102	NARROWS 210248484	7.35	503 n/a	2. >10 - 20%	1.46	0.15	1.32	0.63	
BANGOR 1101	BANGOR 110131502	7.32	504 n/a	2. >10 - 20%	0.05	0.00	0.05	0.00	
MOUNTAIN QUARRIES 210	MOUNTAIN QUARRIES 21011346	7.19	510 n/a	2. >10 - 20%	0.22	0.00	0.22	0.05	
BROWNS VALLEY 1101	BROWNS VALLEY 110117011	7.11	512 n/a	2. >10 - 20%	0.23	0.00	0.23	0.16	
WYANDOTTE 1107	WYANDOTTE 110777578	7.09	515 n/a	2. >10 - 20%	0.19	0.09	0.10	0.00	
SAN JOAQUIN NO2 1103	SAN JOAQUIN #2 1103157026	6.10	553 n/a	2. >10 - 20%	0.13	0.00	0.13	0.24	
GRASS VALLEY 1103	GRASS VALLEY 11031700	6.04	557 n/a	2. >10 - 20%	0.04	0.00	0.04	0.00	
UKIAH 1111	UKIAH 111129452	4.79	620 n/a	2. >10 - 20%	0.05	0.00	0.05	0.00	
POTTER VALLEY P H 1105	POTTER VALLEY P H 110576498	4.37	658 n/a	3. >20 - 30%	0.06	0.06	0.00	0.00	
OLETA 1101	OLETA 11011208	4.12	675 n/a	3. >20 - 30%	0.27	0.00	0.27	0.00	
BRUNSWICK 1105	BRUNSWICK 11052210	3.92	692 n/a	3. >20 - 30%	0.13	0.00	0.13	0.00	
OREGON TRAIL 1103	OREGON TRAIL 11031500	3.80	703 n/a	3. >20 - 30%	1.84	0.00	1.84	0.00	
GEYSERVILLE 1101	GEYSERVILLE 1101circuit_breaker	2.89	780 n/a	3. >20 - 30%	0.09	0.00	0.09	0.19	
NARROWS 2102	NARROWS 21022220	2.59	807 n/a	3. >20 - 30%	0.03	0.03	0.00	0.00	
BELL 1108	BELL 1108circuit_breaker	2.17	864 n/a	3. >20 - 30%	0.02	0.00	0.02	0.10	
OREGON TRAIL 1103	OREGON TRAIL 11031448	2.10	877 n/a	3. >20 - 30%	0.31	0.00	0.31	0.03	
OLETA 1101	OLETA 11011217	1.99	896 n/a	3. >20 - 30%	0.57	0.00	0.57	0.00	
SHINGLE SPRINGS 2109	SHINGLE SPRINGS 210911092	1.92	910 n/a	3. >20 - 30%	0.13	0.00	0.13	0.00	
KONOCTI 1102	KONOCTI 1102948	1.68	960 n/a	3. >20 - 30%	0.00	0.00	0.00	0.00	
WYANDOTTE 1107	WYANDOTTE 110796390	1.61	980 n/a	4. >30 - 40%	0.09	0.05	0.04	0.00	
KONOCTI 1102	KONOCTI 1102532	1.44	1021 n/a	4. >30 - 40%	0.00	0.00	0.00	0.00	
TIVY VALLEY 1107	TIVY VALLEY 11077380	1.42	1025 n/a	4. >30 - 40%	3.48	0.00	3.48	0.06	
OLETA 1101	OLETA 11014768	1.41	1028 n/a	4. >30 - 40%	0.43	0.00	0.43	0.00	
MORGAN HILL 2105	MORGAN HILL 210542348	1.37	1038 n/a	4. >30 - 40%	0.32	0.00	0.32	0.00	
KONOCTI 1102	KONOCTI 1102596	1.20	1095 n/a	4. >30 - 40%	0.02	0.00	0.02	0.00	
WOODSIDE 1101	WOODSIDE 11011922	0.84	1198 n/a	4. >30 - 40%	0.07	0.00	0.07	0.04	
BRUNSWICK 1106	BRUNSWICK 110663124	0.73	1241 n/a	4. >30 - 40%	0.17	0.04	0.14	0.05	
WILLITS 1104	WILLITS 110434008	0.71	1251 n/a	4. >30 - 40%	0.08	0.00	0.08	0.00	
SILVERADO 2104	SILVERADO 2104circuit_breaker	0.70	1257 n/a	4. >30 - 40%	0.01	0.00	0.01	0.00	
OAKHURST 1101	OAKHURST 1101circuit_breaker	0.66	1268 n/a	4. >30 - 40%	0.18	0.01	0.17	0.05	
LINCOLN 1104	LINCOLN 11045391	0.62	1283 n/a	4. >30 - 40%	0.37	0.00	0.37	0.00	
OAKHURST 1103	OAKHURST 11035732	0.61	1292 n/a	4. >30 - 40%	1.04	0.00	1.04	0.00	
OAKHURST 1103	OAKHURST 11035120	0.56	1317 n/a	5. >40 - 50%	0.04	0.00	0.04	0.07	
OLETA 1101	OLETA 110151740	0.48	1386 n/a	5. >40 - 50%	0.52	0.06	0.46	0.00	
OAKHURST 1103	OAKHURST 110310190	0.44	1403 n/a	5. >40 - 50%	0.02	0.00	0.02	0.00	
KESWICK 1101	KESWICK 11019712	0.43	1418 n/a	5. >40 - 50%	0.06	0.00	0.06	0.00	
WILLITS 1102	WILLITS 11021270	0.43	1420 n/a	5. >40 - 50%	0.10	0.00	0.10	0.00	
DIAMOND SPRINGS 1105	DIAMOND SPRINGS 1105circuit_breake	0.42	1424 n/a	5. >40 - 50%	0.19	0.00	0.19	0.10	
TIVY VALLEY 1107	TIVY VALLEY 1107circuit_breaker	0.41	1431 n/a	5. >40 - 50%	2.28	0.00	2.28	0.00	

Column 1: Circuit Name	Column 2: Circuit Protection Zone	Column 3: Tree Weighted Risk Score	Column 4: Tree Weighted Rank	Column 5: Plan (Mile Cutoff)	Column 6: Risk Tranche	Column 7: Gross Miles Complete and Verified as of 9/30/21 (Audited)	Column 8: Miles Deducted due to Failures Identified during Repatrols as of 9/30/21 (Unaudited)	Column 9: Net Miles Complete and Verified as of 9/30/21 (Unaudited)	Column 10: Miles Ready for Work Verification as of 9/30/21 (Unaudited)
RINCON 1103	RINCON 1103568	0.41	1435	n/a	5. >40 - 50%	0.68	0.00	0.68	0.16
BANGOR 1101	BANGOR 11011806	0.35	1478	n/a	5. >40 - 50%	0.61	0.00	0.61	0.20
OAKHURST 1103	OAKHURST 11035470	0.34	1481	n/a	5. >40 - 50%	0.02	0.01	0.01	0.00
MARIPOSA 2101	MARIPOSA 21014410	0.29	1525	n/a	5. >40 - 50%	0.05	0.00	0.05	0.00
OAKHURST 1101	OAKHURST 11016220	0.22	1604	n/a	5. >40 - 50%	3.96	0.00	3.96	0.86
MARIPOSA 2101	MARIPOSA 210135244	0.17	1679	n/a	6. >50%	0.01	0.00	0.01	0.00
PASO ROBLES 1103	PASO ROBLES 1103N58	0.16	1684	n/a	6. >50%	0.07	0.00	0.07	0.00
KONOCTI 1102	KONOCTI 11022293	0.16	1688	n/a	6. >50%	0.05	0.00	0.05	0.00
CURTIS 1705	CURTIS 17058110	0.12	1764	n/a	6. >50%	0.07	0.00	0.07	0.00
RINCON 1103	RINCON 1103circuit_breaker	0.12	1767	n/a	6. >50%	0.02	0.00	0.02	0.05
MORGAN HILL 2105	MORGAN HILL 2105circuit_breaker	0.10	1787	n/a	6. >50%	0.01	0.00	0.01	0.00
BROWNS VALLEY 1101	BROWNS VALLEY 1101circuit_breaker	0.07	1859	n/a	6. >50%	0.04	0.00	0.04	0.00
PUEBLO 2103	PUEBLO 2103694	0.03	2020	n/a	6. >50%	0.15	0.00	0.15	0.00
SOBRANTE 1102	SOBRANTE 1102circuit_breaker	0.01	2149	n/a	6. >50%	3.74	0.03	3.71	0.00
MORGAN HILL 2105	MORGAN HILL 2105XR602	0.00	2260	n/a	6. >50%	0.00	0.00	0.00	0.00
RINCON 1103	RINCON 1103472	0.00	2775	n/a	6. >50%	0.28	0.00	0.28	0.38
(blank)	(blank)			n/a	6. >50%	0.85	0.00	0.85	0.70

Total		1078.56				84.92	0.98	83.94	13.28
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