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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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

PACIFIC GAS AND ELECTRIC COMPANY'S (U39M) 2024 SAFETY PERFORMANCE METRICS REPORT IN COMPLIANCE WITH CALIFORNIA PUBLIC UTILITIES COMMISSION DECISIONS 19-04-020 AND 21-11-009 (CORRECTIONS TO METRIC 2 AND SECTION 4)

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Dated: November 21, 2025

PACIFIC GAS AND ELECTRIC COMPANY'S (U39M)
2024 SAFETY PERFORMANCE METRICS REPORT
IN COMPLIANCE WITH CALIFORNIA PUBLIC UTILITIES COMMISSION
DECISIONS 19-04-020 AND 21-11-009
(CORRECTIONS TO METRIC 2 AND SECTION 4)

Pacific Gas and Electric Company (PG&E) hereby submits these corrections to its 2024 Safety Performance Metrics Report filed April 1, 2025. The corrections are limited to errors in Metric 2 (Transmission and Distribution Overhead Wires Down – Major Event Days) and Section 4 (2024 Imputed Adopted Values for Safety-Related Risk Mitigation and Controls Activities). The Introduction and Attachment A – Monthly Metric Data Tables for Metric 2 have also been corrected. PG&E has provided the corrections, shown in red font, as Attachment 1.

Respectfully Submitted,

By: */s/ Peter Ouborg*
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Dated: November 21, 2025

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 1

Chapter 1 – Introduction

Section 4 – 2024 Imputed Adopted Values for Safety-Related Risk Mitigation and Controls Activities

Metric 2 – Transmission and Distribution Overhead Wires Down – Major Event Days

Attachment A – Monthly Metric Data Tables

PACIFIC GAS AND ELECTRIC COMPANY

2024 SAFETY PERFORMANCE METRICS REPORT

CHAPTER 1

INTRODUCTION

PACIFIC GAS AND ELECTRIC COMPANY
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INTRODUCTION

A. Introduction

Pacific Gas and Electric Company (PG&E) submits its 2024 Safety Performance Metrics Report (SPMR) in compliance with Decision (D.) 19-04-020 and D.21-11-009 concerning the Risk-Based Decision-Making Framework proceeding, Rulemaking 20-07-013. The purpose of the SPMR is to provide the Commission and interested parties' information on PG&E's performance related to key safety metrics.

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

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

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

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

1. Background

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

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

2. Summary of 2024 Metric Data

Line No.	Metric Name	Units	2024 Data
1	1. Transmission & Distribution (T&D) Overhead Wires-Down Non-Major Event Days	Number of wires-down events	3,199
2	2. Transmission & Distribution (T&D) Overhead Wires Down - Major Event Days	Number of wires-down events	4,676
3	3. Electric Emergency Response Time	The time in minutes that an electric crew person or a qualified first responder takes to respond after receiving a call which results in an emergency order.	Average: 29 minutes Median: 27 minutes
4	4. Fire Ignitions	Number of ignitions	532
5	5. Gas Dig-In	The number of 3rd party gas dig ins per 1,000 USA tags/tickets	Gas Tickets: 1,355,834 3rd Party Dig-ins: 1,224 3rd Party Dig-in Ratio: 0.90 per 1,000 USA tags/tickets
6	6. Gas In-Line Inspection	Total number of miles of inspections performed and percentage inspected by ILI.	366.5 miles inspected by ILI in 2024 out of a total of 5,653 miles of Transmission Lines which is equivalent to 6% inspected annually.
7	7. Gas In-Line Inspection Upgrades	Miles	36.5

Line No.	Metric Name	Units	2024 Data
8	8. Gas Shut-In Time – Mains	Time in minutes required to stop the flow of gas for Distribution Mains	EOY (Median): 83.6 EOY (Avg): 98.4
9	9. Gas Shut-In Time – Services	Time in minutes required to stop the flow of gas for Distribution Services	EOY (Median): 34.2 EOY (Avg): 44.5
10	10. Cross Bore Intrusions	Number of cross bore intrusions per 1,000 inspections	Inspections Complete: 3,655 Cross Bores Found: 19 Find Rate: 5.20 per 1,000 inspections.
11	11. Gas Emergency Response Time	The time in minutes that a gas service representative or a qualified first responder takes to respond after receiving a call which results in an emergency order.	Median: 18.1 Average: 19.6
12	12. Natural Gas Storage Baseline Inspections Performed	Number of Assessments completed/Number scheduled or targeted	EOY Well Baseline Inspections: 17 EOY % Progress to Goal: 98%
13	13. Gas System Internal Inspection Status	Percentage	EOY System Piggability: 58.09% EOY Piggable Milage Total: 3,284
14	14. Employee Days Away, Restricted and Transfer (DART) Rate	DART Cases times 200,000 divided by employee hours worked	0.72 EOY
15	15. Rate of SIF Actual (Employee)	Number of SIF-Actual cases among employees x 200,000/employee hours worked	0.02 EOY
16	16. Rate of SIF Actual (Contractor)	Number of SIF-Actual cases among contractors x 200,000/contractor hours worked	0.01 EOY
17	17. Rate of SIF Potential (Employee)	Number of SIF-Potential cases among employees x 200,000/employee hours worked	0.04 EOY
18	18. Rate of SIF Potential (Contractor)	Number of SIF-Potential cases among contractors x 200,000/contractor hours worked	0.06 EOY

Line No.	Metric Name	Units	2024 Data
19	19. Contractor Days Away, Restricted Transfer (DART)	OSHA DART Rate	0.34 EOY
20	20. Public Serious Injuries and Fatalities	Number of Serious Injuries and Fatalities	17
21	21. Helicopter/ Flight Accident or Incident	Number of accidents or incidents (as defined in 49 CFR Section 830.5 “Immediate Notification”) per 100,000 flight hours.	Total Incidents: 1 Total number of flight hours per year for reporting the number of incidents per 100,000 flight hours: 25,539
22	22. percentage of Serious Injury and Fatality Corrective Actions Completed on Time.	Total number of SIF corrective actions completed on time (as measured by the due date accepted by functional area Corrective Action Review Boards (CARB)) divided by the total number of SIF corrective actions past due or completed.	99%
23	23. Hard Brake Rate	Total number of hard braking events per thousand miles driven in a given period	0.4
24	24. Driver’s Call Complaint Rate	Total number of driver complaint calls received per 1 million miles driven	4.6
25	25. Wires-Down not resulting in Automatic De-energization	Percentage of wires down occurrences	Distribution: 12% Transmission: 8.5%
26	26. Missed Inspections and Patrols for Electric Circuits	Percentage of structures that missed inspection relative to total required structures.	Distribution Patrols: 0.00% Distribution Inspections: 0.00% Transmission Patrols: 0.00% Transmission Inspection: 0.00%
27	27. Overhead Conductor Size in High Fire Threat District Tiers 2 and 3, HFTD	Percentage of primary distribution overhead conductors in Tiers 2 and 3 HFTD that is #6 copper (6Cu) relative to total circuit miles	9.84%

Line No.	Metric Name	Units	2024 Data
28	28. Gas Operation Corrective Actions Backlog	Percentage of work orders past due for completion in the past calendar year	Distribution Overdue Work Orders: 70 Total Work Orders: 6,480 EOY: 1% Transmission Overdue Work Orders: 5 Total Work Orders: 396 EOY: 1%
29	29. GO-95 Corrective Actions (Tiers 2 and 3, HFTD)	Percentage of corrective actions completed	Distribution: 15% Transmission: 68% Vegetation Management: 99%
30	30. Gas Overpressure Events	Number of occurrences	Distribution: 0 Transmission: 4
31	31. Gas In-Line Inspections Missed	Number of Missed Inspections	Gas in-line inspections missed: 0
32	32. Overhead Conductor Safety Index	Number of occurrences per 1,000 circuit miles	Total Events: 3,199 Total Events per 1,000 circuit miles: 32.56

PACIFIC GAS AND ELECTRIC COMPANY

2024 SAFETY PERFORMANCE METRICS REPORT

SECTION 4

2024 IMPUTED ADOPTED VALUES FOR SAFETY RELATED RISK MITIGATION AND CONTROLS ACTIVITIES

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IV. 2024 Imputed Adopted Values for Safety-Related and Risk Mitigation and Controls Activities

The total risk mitigation and control spending level as adopted in the 2023 General Rate Case (GRC) for 2024 and the recorded spend is provided in Tables 4-1 (expense) and 4-2 (capital) below. Please refer to Pacific Gas and Electric Company's (PG&E or the Company) 2024 Risk Spending Accountability Report (RSAR) that will include the final risk mitigation and control spending, as well as additional detail on activities presented in PG&E's 2020 Risk Assessment and Mitigation Phase (RAMP) Report and 2023 GRC, including variance explanations for those activities/programs that meet the California Public Utilities Commission's variance criteria threshold.

TABLE 4-1
2024 TOTAL SAFETY-RELATED RISK MITIGATION AND CONTROLS IMPUTED ADOPTED VALUES AND RECORDED COSTS EXPENSE
(THOUSANDS OF DOLLARS)

Line No.	Functional Area	2024 Imputed Adopted Costs	2024 Actual Costs	Difference for 2024 ($)	Spending Percent Variance for 2024 (%)
1	Gas Distribution	449,433.0	343,174.1	(106,258.9)	-23.6%
2	Gas Transmission & Storage	532,451.8	427,403.4	(105,048.4)	(19.7)%
3	Electric Distribution	2,285,296.8	2,588,837.9	303,541.0	13.3%
4	Nuclear Generation	269,706.6	268,559.4	(1,147.2)	(0.4)%
5	Power Generation	216,604.6	208,803.9	(7,800.7)	(3.6)%
6	Customer and Communications	55,286.3	50,076.2	(5,210.1)	(9.4)%
7	Shared Services/Information Technology	176,534.1	347,816.7	171,282.5	97.0%
8	Human Resources	41,244.3	33,323.5	(7,920.9)	(19.2)%
9	Total	4,026,557.7	4,267,995.1	241,437.4	6.0%

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

(1) The Enterprise, Health & Safety (EH&S) imputed adopted and actual costs reflect department costs only. Occupational Health adopted and actual costs are included in Corporate Items at a much higher level of detail for consistency at the Company level.

(2) Safety, Reliability, and/or Maintenance (SRM) spend in several Shared Service organizations (Transportation & Aviation Services, Sourcing, Corporate Real Estate Strategy and Services (CRESS), and Land & Environmental Management) include investments that support Wildfire mitigations and are recorded in the Wildfire Mitigation Balancing Account, Wildfire Mitigation Plan Memorandum Account (WMPMA), and Fire Risk Mitigation Memorandum Account.

(3) SRM spend in the CRESS organization also includes investments addressing the move from the San Francisco General Office (SFGO) to the new Oakland General Office (OGO) and are recorded in the General Office Sale Memorandum Account (GOSMA).

TABLE 4-2
2024 TOTAL SAFETY-RELATED RISK MITIGATION AND CONTROLS
IMPUTED ADOPTED VALUES AND RECORDED COSTS CAPITAL
(THOUSANDS OF DOLLARS)

Line No.	Functional Area	2024 Imputed Adopted Costs	2024 Actual Costs	Difference for 2024 ($)	Spending Percent Variance for 2024 (%)
1	Gas Distribution	785,427.2	783,713.4	(1,713.8)	(0.2)%
2	Gas Transmission & Storage	792,724.8	711,415.0	(81,309.8)	(10.3)%
3	Electric Distribution	3,916,505.5	5,270,932.9	1,354,427.4	34.6%
4	Nuclear Generation	5,914.3	4,040.3	(1,874.0)	(31.7)%
5	Power Generation	344,238.7	470,844.9	126,606.2	36.8%
6	Customer and Communications	114,183.1	103,893.8	(10,289.3)	(9.0)%
7	Shared Services/Information Technology	554,937.5	586,736.1	31,798.6	5.7%
8	Human Resources	1,146.6	2,614.0	1,467.4	128.0%
9	Total	6,515,077.7	7,934,190.4	1,419,112.7	21.8%

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

(1) The EH&S imputed adopted and actual costs reflect department costs only. Occupational Health adopted and actual costs are included in Corporate Items at a much higher level of detail for consistency at the Company level.

(2) SRM spend in CRESS include investments that support Wildfire mitigations and are recorded in the WMPMA.

(3) SRM spend in the CRESS organization also includes investments addressing the move from the SFGO to the new OGO and are recorded in the GOSMA.

TABLE 4-3
2024 TOTAL SAFETY-RELATED RISK MITIGATION IMPUTED ADOPTED VALUES AND RECORDED COSTS BY RAMP CHAPTER EXPENSE
(THOUSANDS OF DOLLARS)

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2024 Imputed Adopted Costs	2024 Actual Costs	Difference for 2024 ($)	Spending Percent Variance for 2024 (%)
1	Gas Distribution	9	3	Large Overpressure Event Downstream of Gas Maintenance and Construction (M&C) Facility	22,271.8	19,606.2	(2,665.6)	(0.1)
2	Gas Distribution	8	3	Loss of Containment on Gas Distribution Main or Service	304,266.6	225,537.3	(78,729.3)	(0.3)
3	Gas Distribution	19	3	Loss of Containment on Compressed Natural Gas (CNG) Station Equipment	4,670.9	3,070.8	(1,600.1)	(0.3)
4	Gas Distribution	19	3	Loss of Containment on Gas Customer Connected Equipment	127,873.1	85,823.9	(42,049.2)	(0.3)
5	Gas Distribution	19	3	Loss of Containment at Gas Measurement & Control / Compression & Processing Facility	23,290.9	21,458.5	(1,832.4)	(0.1)
6	Gas Distribution	Not in RAMP	3	Insufficient Capacity to Meet Customer Demand	24,693.0	15,922.5	(8,770.5)	(0.4)
7	Gas Transmission & Storage	9	3	Large Overpressure Event Downstream of Gas M&C Facility	15,842.0	16,541.4	699.4	0.0
8	Gas Transmission & Storage	19	3	Loss of Containment at Natural Gas Storage Well or Reservoir	6,599.6	4,661.7	(1,937.9)	(0.3)
9	Gas Transmission & Storage	7	3	Loss of Containment on Gas Transmission Pipeline	71,818.0	34,521.6	(37,296.4)	(0.5)
10	Gas Transmission & Storage	19	3	Loss of Containment at Gas Measurement & Control / Compression & Processing Facility	47,873.1	42,007.4	(5,865.7)	(0.1)

TABLE 4-3
2024 TOTAL SAFETY-RELATED RISK MITIGATION IMPUTED ADOPTED VALUES AND RECORDED COSTS BY RAMP CHAPTER EXPENSE
(THOUSANDS OF DOLLARS)
(CONTINUED)

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2024 Imputed Adopted Costs	2024 Actual Costs	Difference for 2024 ($)	Spending Percent Variance for 2024 (%)
11	Gas Transmission & Storage	Not in RAMP	3	Insufficient Capacity to Meet Customer Demand	1,008.6	3,321.1	2,312.5	2.3
12	Electric Distribution	10	4	Wildfire	1,729,342.7	1,763,261.2	33,918.5	2.0%
13	Electric Distribution	11	4	Failure of Distribution Overhead Assets	1,185,859.8	1,361,871.4	176,011.7	14.8%
14	Electric Distribution	12	4	Failure of Distribution Underground Network Assets	42,461.4	45,029.3	2,567.9	6.0%
15	Electric Distribution	19	4	Failure of Substation Assets	28,161.6	29,167.0	1,005.4	3.6%
16	Electric Distribution	20	4	Cross-Cutting Factors – Emergency Preparedness & Response, IT Asset Failure	28,299.6	24,149.1	(4,150.6)	(14.7)%
17	Electric Distribution	POST-GRC (RAMP) Mitigations[(a)]	4	N/A	0.0	1,909.6	1,909.6	100%
18	Electric Distribution	Not in RAMP	4	N/A	360,240.3	689,336.0	329,095.8	91.4%
19	Nuclear Generation	Not in RAMP	5	N/A	269,706.6	268,559.4	(1,147.2)	(0.4)%
20	Power Generation	13	5	Hydro System Safety - Dams	0.0	0.0	0.0	0%
21	Power Generation	Not in RAMP	5	N/A	0.0	186,071.1	186,071.1	100%
22	Customer & Communications	Not in RAMP	6	N/A	55,286.3	50,076.2	(5,210.1)	(9)%
23	Shared Services/Information Technology: Corporate Real Estate Strategy and Services	14	7	Real Estate And Facilities Failure	13,034.7	1,410.8	(11,623.9)	(89)%
24	Shared Services/Information Technology: Enterprise Health & Safety	15-18	7	Contractor Safety, Employee Safety, Fitness for Duty Awareness, Motor Vehicle Safety	27,394.3	38,392.2	10,997.9	40%

TABLE 4-3
2024 TOTAL SAFETY-RELATED RISK MITIGATION IMPUTED ADOPTED VALUES AND RECORDED COSTS BY RAMP CHAPTER EXPENSE
(THOUSANDS OF DOLLARS)
(CONTINUED)

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2024 Imputed Adopted Costs	2024 Actual Costs	Difference for 2024 ($)	Spending Percent Variance for 2024 (%)
25	Shared Services/Information Technology: Various	20	7	Cross-Cutting Factors – Cyber Attack, Physical Attack, IT Asset Failure, Records and Information Management	201,084.8	135,038.8	(66,046.1)	(33)%
26	Shared Services/Information Technology: Various	Not in RAMP	7	N/A	(64,979.7)	172,974.9	237,954.6	(366)%
27	Human Resources	20	21	Cross-Cutting Factors – Skilled and Qualified Workforce	41,244.3	33,323.5	(7,920.9)	(19)%

Note: All values are from the 2020 RAMP as updated in the 2023 GRC. Values should not be totaled. Some costs mitigate multiple risks and therefore are reflected in more than one 2020 RAMP chapter (e.g., double counted due to the nature of how mitigation activities function). Gas Transmission & Storage and Electric Transmission RAMP costs are not included in this table.

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

TABLE 4-4
2024 TOTAL SAFETY-RELATED RISK MITIGATION IMPUTED ADOPTED VALUES AND RECORDED COSTS BY RAMP CHAPTER CAPITAL
(THOUSANDS OF DOLLARS)

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2024 SRM Imputed Adopted Costs	2024 SRM Actual Costs	Difference for 2024 ($)	Spending Percent Variance for 2024 (%)
1	Gas Distribution	9	3	Large Overpressure Event Downstream of Gas Maintenance and Construction (M&C) Facility	61,822.3	73,254.3	11,432.0	0.2
2	Gas Distribution	19	3	Loss of Containment on Compressed Natural Gas (CNG) Station Equipment	4,948.3	4,512.1	(436.3)	(0.1)
3	Gas Distribution	19	3	Loss of Containment on Gas Customer Connected Equipment	7,826.2	15,914.7	8,088.5	1.0
4	Gas Distribution	8	3	Loss of Containment on Gas Distribution Main or Service	674,038.0	680,143.3	6,105.3	0.0
5	Gas Distribution	19	3	Loss of Containment at Gas Measurement & Control / Compression & Processing Facility	61,822.3	66,489.5	4,667.2	0.1
6	Gas Distribution	Not in RAMP	3	Insufficient Capacity to Meet Customer Demand	42,870.9	11,079.3	(31,791.6)	(0.7)
7	Gas Transmission & Storage	9	3	Large Overpressure Event Downstream of Gas M&C Facility	76,133.5	104,725.0	28,591.5	0.4
8	Gas Transmission & Storage	19	3	Loss of Containment at Natural Gas Storage Well or Reservoir	98,437.2	141,116.6	42,679.4	0.4
9	Gas Transmission & Storage	7	3	Loss of Containment on Gas Transmission Pipeline	457,700.2	387,365.8	(70,334.4)	(0.2)
10	Gas Transmission & Storage	19	3	Loss of Containment on LNG/CNG Portable Equipment	4,345.2	9,346.1	5,001.0	1.2

TABLE 4-4
2024 TOTAL SAFETY-RELATED RISK MITIGATION IMPUTED ADOPTED VALUES AND RECORDED COSTS BY RAMP CHAPTER CAPITAL
(THOUSANDS OF DOLLARS)
(CONTINUED)

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2024 SRM Imputed Adopted Costs	2024 SRM Actual Costs	Difference for 2024 ($)	Spending Percent Variance for 2024 (%)
11	Gas Transmission & Storage	19	3	Loss of Containment at Gas Measurement & Control / Compression & Processing Facility	216,382.4	174,949.6	(41,432.8)	(0.2)
12	Gas Transmission & Storage	Not in RAMP	3	Insufficient Capacity to Meet Customer Demand	10,498.9	4,753.8	(5,745.1)	(0.5)
13	Electric Distribution	10	4	Wildfire	1,808,965.3	2,095,974.1	287,008.8	0.2
14	Electric Distribution	11	4	Failure of Distribution Overhead Assets	1,726,195.1	1,998,574.1	272,379.0	0.2
15	Electric Distribution	12	4	Failure of Distribution Underground Network Assets	216,610.4	172,501.5	(44,108.9)	(0.2)
16	Electric Distribution	19	4	Failure of Substation Assets	137,091.8	91,508.1	(45,583.7)	(0.3)
17	Electric Distribution	20	4	Cross-Cutting Factors - Emergency Preparedness & Response, IT Asset Failure	6,179.7	27,599.8	21,420.2	3.5
18	Electric Distribution	POST-GRC (RAMP) Mitigations[(a)]	4	N/A	0.0	1,627.6	1,627.6	1.0
19	Electric Distribution	Not in RAMP	4	N/A	857,372.4	1,398,055.2	540,682.8	0.6
20	Nuclear Generation	Not in RAMP	5	N/A	5,914.3	4,040.3	(1,874.0)	(0.3)
21	Power Generation	13	5	Hydro System Safety - Dams	122,596.3	107,146.7	(15,449.6)	(0.1)
22	Power Generation	Not in RAMP	5	N/A	221,642.4	363,698.2	142,055.8	0.6

TABLE 4-4
2024 TOTAL SAFETY-RELATED RISK MITIGATION IMPUTED ADOPTED VALUES AND RECORDED COSTS BY RAMP CHAPTER CAPITAL
(THOUSANDS OF DOLLARS)
(CONTINUED)

Line No.	Functional Area	2020 RAMP Chapter	2023 GRC Exhibit	2020 RAMP Chapter Title	2024 SRM Imputed Adopted Costs	2024 SRM Actual Costs	Difference for 2024 ($)	Spending Percent Variance for 2024 (%)
23	Customer & Communications	Not in RAMP	6	N/A	114,183.1	103,893.8	(10,289.3)	(0.1)
24	Shared Services/Information Technology: Corporate Real Estate Strategy and Services	14	7	Real Estate And Facilities Failure	201,879.7	144,491.7	(57,388.0)	(0.3)
25	Shared Services/Information Technology: Enterprise Health & Safety	15-18	7	Contractor Safety, Employee Safety, Fitness for Duty Awareness, Motor Vehicle Safety	0.0	1,291.7	1,291.7	1.0
26	Shared Services/Information Technology: Various	20	7	Cross-Cutting Factors – Cyber Attack, Physical Attack, Information Technology Asset Failure, Records and Information Management	353,057.8	253,075.4	(99,982.4)	(0.3)
27	Shared Services/Information Technology: Various	Not in RAMP	7	N/A	0.0	187,877.3	187,877.3	1.0
28	HR	20	21	Cross-Cutting Factors – Skilled and Qualified Workforce	1,146.6	2,614.0	1,467.4	1.3

Note: All values are from the 2020 RAMP as updated in the 2023 GRC. Values should not be totaled. Some costs mitigate multiple risks and therefore are reflected in more than one 2020 RAMP chapter (e.g., double counted due to the nature of how mitigation activities function). Gas Transmission & Storage and Electric Transmission RAMP costs are not included in this table.

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

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

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

Risks: Wildfire, Transmission Overhead Conductor, Distribution Overhead Conductor Primary[1]

Category: Electric

Units: Number of wires down events

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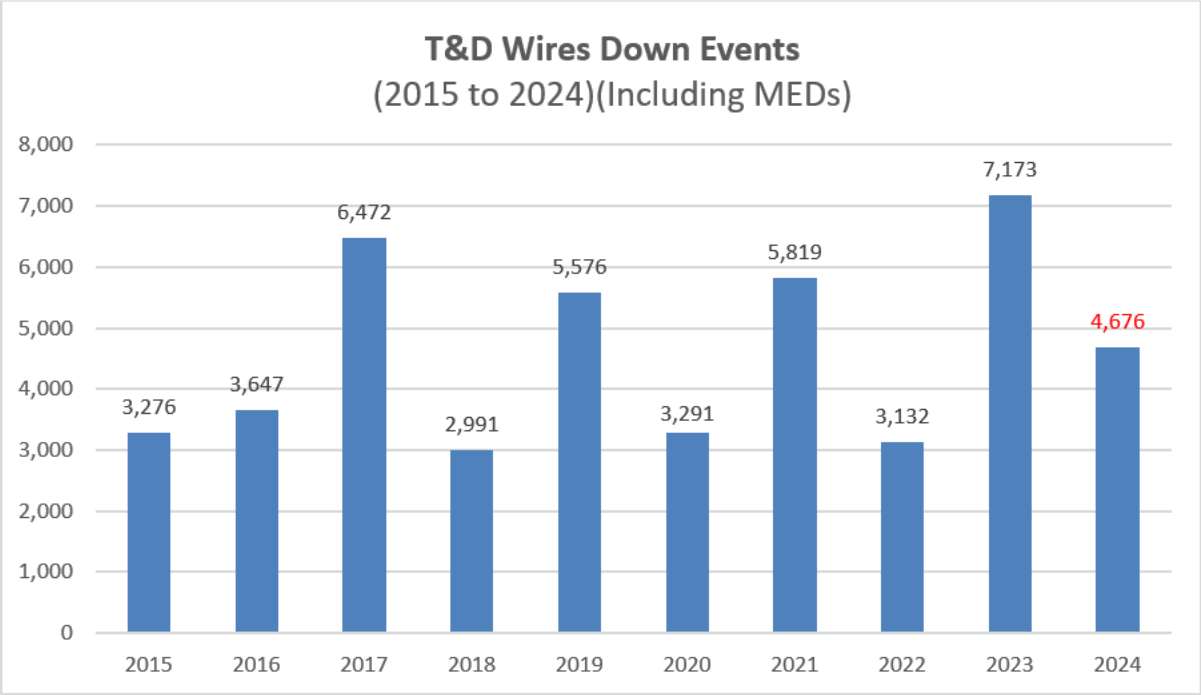
1 The Corporate Risk Register now has the following risks: (1) Wildfire, (2) Failure of Electric Distribution Overhead Assets (3) Failure of Electric Transmission Overhead Assets.

Summary:

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



Historical Number of MEDs

2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
10	3	30	7	31	14	25	5	20	5

Note: The data in this figure is subject to change based on continuing review of prior period outages.

Narrative Context: The metric, inclusive of MEDs, is not being used for internal reporting purposes. Pacific Gas and Electric Company (PG&E) focuses on transmission and distribution conductor wires down events excluding MEDs. As referenced in Figure 5-2, particularly in years 2017, 2019, 2021, and 2023, the results for this metric shows significant fluctuation based on the number of severe weather event days in a particular year. Per Institute of Electrical and Electronics Engineers (IEEE) 1366 Standard, PG&E excludes MEDs to allow major events to be analyzed apart from daily operation and avoid allowing daily trends to be hidden by the large statistical effect of major events. Note: PG&E is working to improve its reliability calculation to align with IEEE 1366-2022. PG&E has consistently utilized Service Point IDs (both active and inactive) for its

reliability calculations and has recently identified underlying data flow issues between different systems. PG&E has continued that approach for reporting the metric results from 2024. PG&E has a multi-year plan in place to improve its metric reporting to fully align with the prevailing standards and industry best practices. Given the fluctuations in this metric from weather patterns, PG&E does not view it as an appropriate metric to properly assess system performance or improvement.

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

No, in 2024, T&D Overhead Wires Down–MEDs was not used as a STIP metric.

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

No, T&D Overhead Wires Down–MEDs is not linked to 2024 individual or group performance goals for Director-level or higher positions.

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

No, T&D Overhead Wires Down–MEDs is not linked to 2024 individual performance goals for Director-level or higher positions.

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

- Engineers conduct post wire down event reviews (typically for the non-MED events) and initiates corrections to the data via the outage quality team to ensure the reporting guidelines were followed and the records align with information reported by repair crews.
- The outage quality team processes all valid change requests received and initiates corrections based on their reviews and findings of the collected outage information.
- IA performed a validation of the 2024 metric performance.

Rate Case Safety Goal Progress: The T&D Wires Down metric (including MEDs) is not a 2023 GRC or 2024 RAMP stated safety goal.

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

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

2024 SAFETY PERFORMANCE METRICS REPORT

TABLE 2

TRANSMISSION AND DISTRIBUTION (T&D) OVERHEAD WIRES DOWN - MAJOR EVENT DAYS

2015-2024

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2015	158	714	143	189	154	211	215	225	188	225	274	580	3,276
2	2016	430	274	714	270	225	211	224	178	213	397	219	292	3,647
3	2017	1,947	1,402	378	468	263	253	233	215	325	486	246	256	6,472
4	2018	216	174	431	231	214	231	283	204	167	219	334	287	2,991
5	2019	880	1,786	335	238	311	229	198	219	232	283	524	341	5,576
6	2020	264	393	515	228	235	213	196	375	233	206	237	196	3,291
7	2021	1,471	187	292	174	217	238	224	222	224	775	248	1,547	5,819
8	2022	276	149	189	274	212	255	196	171	223	142	252	793	3,132
9	2023	2,166	1,627	1,679	211	175	152	177	253	160	157	197	219	7,173
10	2024	310	1,594	447	212	203	201	234	161	176	144	421	573	4,676

(a) PG&E has utilized its Integrated Logging Information System-Operations Data Base (ILIS-ODB) to provide the number of distribution outages that involved distribution wire down event conditions.

(b) Distribution wire down conditions during PSPS events are not included in these totals since these typically occur when the lines are de-energized and are generally not the initiating cause of the reported outage event.

(c) PG&E's current definition for distribution wire down events are only related to sustained outages of its primary distribution system reported in its ILIS-ODB data base.

(d) Transmission wire down events were not tracked until 2012 and 2013 was the first year distribution wire down events were uniformly tracked.

(e) The data in this table is subject to change based on continuing review of prior period outages.