BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Wildfire Safety Division
California Public Utility Commission

COMMENTS OF THE GREEN POWER INSTITUTE ON DRAFT RESOLUTION WSD-019

July 1, 2021

Gregory Morris, Director
Zoë Harrold, Scientist
The Green Power Institute
a program of the Pacific Institute
2039 Shattuck Ave., Suite 402
Berkeley, CA 94704
ph: (510) 644-2700
fax: (510) 644-1117
gmorris@emf.net

COMMENTS OF THE GREEN POWER INSTITUTE
ON DRAFT RESOLUTION WSD-019

Pursuant to instructions in the June 10, 2021, cover letter accompanying Draft Action Statement and Draft Resolution WSD-019, The Green Power Institute, the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security (GPI), provides these *Comments of the Green Power Institute on Draft Resolution WSD-019*.

GPI generally supports the key improvements and additional issues/remedies established in Draft Resolution WSD-019 and the associated Action Statement (WSD-019 Attachment A). WMP reporting expectations and report quality continues to improve with each iteration of WMP filings. In general, there is still substantial work needed to vet and improve quantitative risk modeling and RSE valuation, as well as link these tools to initiative deployment in order to establish robust risk-based decision making within wildfire mitigation plans and efforts. Draft Resolution WSD-019 makes progress to this effect and highlights numerous elements of WMP refinements and expectations that are relevant to all utilities and that should be formally included in the WMP reporting guidelines and templates.

Risk modeling and transparent model vetting

In opening comments on the 2021 IOU WMP Updates GPI stressed the need for a robust and transparent risk model vetting process, summarized as "Risk Modeling and the risk of not getting it "right:" Wildfire and ignition risk models require comprehensive and transparent vetting." While PG&E had the most egregious risk modeling errors, we advocated that all utility risk models must be subjected to a vetting process since the WMP do not provide adequate quantitative risk model evaluation metrics and because risk model results are foundational to selecting and efficiently deploying wildfire risk mitigations on a granular level. GPI therefore supports WSD-019 key areas for improvement regarding ignition sources in risk modeling (SDGE-1) and wildfire risk modeling consistency

(SDGE-2), as well as peripherally related improvements to transparent decision making (SDGE-9) and HFTD prioritization for CC and undergrounding (SDGE-10). However, these key improvements do not go far enough towards requiring comprehensive and transparent model vetting that is required prior to moving towards a more standardized risk model.

Developing a standardized risk model will take time, and will require substantial comparative efforts between existing models, utility (especially IOU) systems, and their available data. Time is at a premium in the WMP process such that targeted and efficient mitigation deployment must continue during the years over which standardized models are being developed and refined. To this end it will be necessary to establish the ability for each individual utility model to guide wildfire mitigation deployment through comprehensive and transparent model vetting analyses and reports. The results of model vetting reports are also required to understand the limitations and benefits of each individual model in order to determine which, if any, risk model methodology is preferred for granular wildfire risk prediction for each risk driver, and whether it can be appropriately applied to all IOUs, and possibly SMJUs. GPI therefore recommends that WSD-019 include an additional key improvement that requires all utilities to prepare a transparent and comprehensive model vetting analysis and report similar to that prepared by E3 for PG&E's risk model. This key improvement can be included as a remedy nested under SDGE-2, and can constitute a product of the mandated working group. GPI is concerned that simply requiring "increased transparency" via a working group is insufficient. It is warranted and reasonable to include this expectation for the working group at the outset, since model vetting is foundational to model selection, and in order to give each utility a head-start in preparing model vetting metrics and reports.

GPI also respectfully requests that the WSD-019 record regarding stakeholder input on page 18 be updated to include GPI's contribution and 2021 WMP update opening comment recommendation that all Utility risk models should be subject to verification:

> There should also be a coordinated approach to the utilities' risk modeling efforts, supported by a WSD-led technical working group (Cal Advocates). The risk models should be subject to verification (MGRA, GPI).

Inspection program accounting for all Utilities

WSD-019 finds issue with SDG&E's failure to include all inspection programs, including drone inspection efforts, in "Inspections-other" in the non-spatial data filings. The proposed remedy states:

> REMEDY: In future non-spatial data filings, SDG&E must provide a comprehensive accounting of the number of inspections performed in the HFTD across all inspection programs, and the number of findings by type from each inspection. Each inspection program which is performed in the HFTD must be represented as a line item, with associated findings (WSD-019, p. 49).

GPI supports this recommendation as it will improve transparency and support peer-review evaluation of inspection method efficacy and efficiency both as an inspection method and across utilities. This will also support SMJU consideration of these technologies for expanding or refining their inspection programs. All utilities should be held to these same reporting requirements to allow consistent WMP transparency and utility cross-comparison. We therefore recommend formally updating the non-spatial inspection data table to include all inspection types (e.g. drone, LiDAR) as sub-categories of inspection, "Other" and/or add this reporting requirement to the language in the WMP guidelines template for inspections.

Extend genus species naming and formatting to all Utility WMP filing requirements

GPI supports extending SDGE-5 regarding "incomplete identification of vegetation species and record keeping" to all utilities. SDGE-5 Remedy 1 suggests that scientific naming requirements will be updated and required in the WSD GIS Reporting standard. Based on our review none of the filing utilities provided genus and species for "at-risk" trees in their 2021 WMP updates. GPI therefore supports extending all remedies associated with SDGE-5 to all utilities required to file WMPs. This can be achieved by updating the WMP

guideline reporting requirements and formalizing additional non-spatial data tables as needed, versus updating all draft Action Statements.

Plots provided in the WSD Action Statement are valuable resources

GPI appreciated the inclusion of multiple comparative plots in the WSD Action Statements. As the WMP filing cycle matures we support ongoing use of summary figures and tables including additional figures comparing per HFTD circuit mile metrics (e.g. utility risk events). The data provided in the non-spatial data tables has proven extremely helpful in both comparing utility progress and evaluating individual utility WMPs. We therefore support ongoing refinement and expansion of this quantitative WMP reporting component, such as via the expansion of inspection-type reporting rows to include drone, LiDAR, and IR inspection findings.

Extend RSE verification effort reporting expectations to all Utilities

GPI agrees with the WSD-019 vetting and transparency issue regarding Resource Allocation Methodology, stating:

> ISSUE: For Capability 41c of the 2021 Maturity Survey, SDG&E selected "RSE estimates are verified by historical or experimental pilot data and confirmed by independent experts or other utilities in CA" starting in 2023. However, SDG&E does not provide details in its 2021 WMP Update regarding the independent experts or collaborations with other utilities to verify the calculated RSE estimations.
>
> - REMEDY: SDG&E must provide details regarding its collaborative efforts supporting RSE verification.

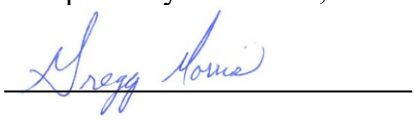
In our opening comments on the IOU 2021 WMP Updates GPI noted broad issues with vague descriptions of third-party assessments and a general lack of external assessment summaries of quantitative WMP modeling elements. While we provided examples from PG&E's 2021 WMP Update we noted that all the IOUs exhibited similar issues particularly when it came to quantitative elements of their WMP Updates. GPI therefore strongly supports the issue suggesting additional transparency into third party reviews of SDG&E's RSE method and values. Since this is a broad issue for all IOUs and utilities in

general, GPI recommends extending RSE verification/validation expectations to all utilities through updates to the WMP guideline template.

Conclusions

The GPI urges the Commission to adopt our analyses and recommendations.

Dated July 1, 2021
Respectfully Submitted,



Gregory Morris, Director
The Green Power Institute
a program of the Pacific Institute
2039 Shattuck Ave., Suite 402
Berkeley, CA 94704
ph: (510) 644-2700
e-mail: gmorris@emf.net