

PUBLIC UTILITIES COMMISSION

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Via Electronic Filing

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Subject: Comments of the Public Advocates Office on the Final Independent Evaluator Annual Reports on Compliance Case No. 2021-IE

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments on the final Independent Evaluator Annual Reports of Compliance for Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) filed on June 30, 2021. We respectfully urge the Office of Energy Infrastructure Safety (OEIS or “Energy Safety”)¹ to adopt the recommendations discussed herein.

I. INTRODUCTION

Pursuant to the guidance in Energy Safety’s July 19, 2021 *Comment Deadline Extension for Independent Evaluator Reports*,² and the April 6, 2021 *Wildfire Safety Division 2021 Guidance on Engagement of Independent Evaluators Pursuant to Public Utilities Code*

¹ On July 1, 2021, the Wildfire Safety Division of the California Public Utilities Commission moved to the California Natural Resources Agency and became the Office of Energy Infrastructure Safety pursuant to Assembly Bill 111, which was signed by the Governor on July 12, 2019 (Chapter 81, Statutes of 2019).

² *Comment Deadline Extension for Independent Evaluator Reports*, Office of Energy Infrastructure Safety, July 19, 2021.

§8386.3,³ Cal Advocates submits these comments on the final Independent Evaluator (IE) Annual Reports of Compliance (ARCs or “reports”) for PG&E, SCE, and SDG&E, published on June 30, 2021 pursuant to Public Utilities Code § 8386.3(c)(2)(B).^{4, 5, 6}

While these inaugural IE reports (2020 IE reports) provide some valuable information, significant improvements to the IE process are necessary to allow a more thorough and complete review of the 2021 plans. These steps will increase transparency and utility accountability:

- Energy Safety should provide more time to allow the IEs to thoroughly examine the utilities’ compliance with their Wildfire Mitigation Plans (WMP).
- Energy Safety should establish a public and transparent process to independently investigate the findings of the 2020 IE reports where the IEs identified areas of noncompliance or were unable to verify that the utilities were meeting their 2020 objectives.
- Energy Safety should require utilities to fully comply with IE requests for information. The utilities cannot be allowed to self-select information provided to the IEs.

II. RECOMMENDATIONS

A. Energy Safety should establish the scope of work for future IE reports sooner.

The IE reports for PG&E, SCE, and SDG&E share a common flaw in that the IEs did not conduct a thorough evaluation of the IOUs’ WMP initiatives. A common factor in this lack of thoroughness is the lack of time given to the IEs to conduct their evaluations. The final scope of work for the IEs was established on April 21, 2021⁷ and the draft of the IE ARCs was due on June 11, 2021.⁸ This gave the IEs less than two months to gather

³ *Wildfire Safety Division 2021 Guidance on Engagement of Independent Evaluators Pursuant to Public Utilities Code §8386.3*, April 6, 2021, p. 2.

⁴ *Final Independent Evaluator Annual Report on Compliance* (IE ARC for PG&E), Bureau Veritas North America, Inc. and C2 Group, June 30, 2021.

⁵ *Final Independent Evaluator Annual Report on Compliance* (IE ARC for SCE), NV5 and Guidehouse, June 30, 2021.

⁶ *Final Independent Evaluator Annual Report on Compliance* (IE ARC for SDG&E), 4LEAF, Inc. and AerialZeus, LLC, June 30, 2021.

⁷ *Final Independent Evaluator Scope of Work for the Review of Compliance with 2020 WMP*, April 21, 2021.

⁸ *Final Independent Evaluator Scope of Work for the Review of Compliance with 2020 WMP*, April 21,

documentation, conduct field surveys, interview utility staff, analyze the information gathered, and compile that information into reports. Cal Advocates recommends that Energy Safety establish the scope of work for the 2021 IE evaluations no later than the end of February 2022, and impose a deadline for IE ARCs no less than four months after the scope of work is established, in order to grant the IEs the opportunity to conduct a more thorough validation of utility work and spending.

B. Energy Safety should investigate the findings of the 2020 IE reports.

In the 2020 IE reports, the IEs identified problems that warrant further investigation by Energy Safety. Cal Advocates recommends that Energy Safety independently investigate those findings in which the IEs were unable to verify, within the time permitted by OEIS, that the utilities were meeting their 2020 objectives and where the IEs identified areas of noncompliance.

C. Energy Safety should establish processes that give IEs access to information required for complete evaluation.

In several instances as detailed below, records requested by the IE were not provided or were incomplete. Energy Safety should include provisions in future IE report guidelines for IEs to request Energy Safety intervention where utilities are unresponsive to IE data requests.

III. COMMENTS

A. Common Issues

1. The IEs are given insufficient time to thoroughly evaluate compliance with the WMP.

The IE reports for PG&E, SCE, and SDG&E all indicate that the abbreviated review timeline negatively impacted the ability of the IEs to effectively review WMP progress.

For example, when discussing WMP activity completion, the IE report for PG&E notes that “due to the extensive nature of PG&E's territory and limited time frame, not all aspects of the depicted metrics have been assessed.”²

Similarly, the IE report for SCE includes numerous comments regarding the time constraints placed on the IE. For example, when evaluating SCE's deployment of covered conductor, the IE stated “Due to time constraints, the IE was unable to make a

2021, p. 7.

² IE ARC for PG&E, p. 15.

final determination if SCE has met the entire program target.”¹⁰ Of the 25 categories in Table 5.4 of the IE Report (IE Findings on 2020 Performance), twelve included a statement which indicates that the IE was unable to conduct a thorough review due to time constraints.¹¹

The IE report for SDG&E noted similar issues, stating that “due to the compressed nature of time on drafting this report, inspecting, and auditing SDG&E’s complex infrastructure has been limited.”¹² In future years, Energy Safety should adjust the timeline for the IE reports to allow as much time as possible, consistent with the requirements of Public Utilities Code § 8386.3, for evaluators to review a representative sample of utility WMP progress.

2. The IEs were not given required access to utility records in some cases.

The IE reports for PG&E and SCE indicate that records requested by the IEs were either not provided or were incomplete.

For example, the IE report for PG&E requested a sample of 800 distribution pole records but, “due to miscommunications between the IE and PG&E, only 315 reports were received from PG&E.”¹³ The report does not state whether either PG&E or the IE attempted to rectify this error, which resulted in the IE reviewing less than half the sample set of records requested.

The IE report for SCE indicated similar issues with SCE. The IE stated that data provided by SCE on the Tree Attachment Remediation program lacked sufficient information on remediation completion date, and that it “could not confirm the tree attachment remediations were performed in 2020 as opposed to a different year.”¹⁴

In another instance, SCE provided the wrong records for the IE’s review of SCE’s Drought Relief Initiative. Here, the IE requested inspection and change records for a sample of 33 inspections and a sample of 33 removal and remediations, and SCE provided the IE with records for 33 items that did not match those selected by the IE.¹⁵ Due to time constraints, the IE chose to state that SCE provided evidence of remediation

¹⁰ IE ARC for SCE, p. 4.

¹¹ IE ARC for SCE, p. 110-114.

¹² IE ARC for SDG&E, p. 3.

¹³ IE ARC for PG&E, p. 22.

¹⁴ IE ARC for SCE, p. 25.

¹⁵ IE ARC for SCE, p. 33.

work being done, but that the evidence was selected by SCE itself and the IE could not vouch for that data as being statistically valid.¹⁶

B. Issues with IE Report for PG&E

1. The IE report does not indicate a thorough evaluation of PG&E’s compliance with its 2020 WMP.

The IE for PG&E performed an assessment of PG&E’s compliance with 346 items related to its 2020 WMP.¹⁷ While the IE concluded that “the majority of initiative activities appeared to be in compliance with 2020 WMP stated targets,”¹⁸ Cal Advocates has identified several areas in which the IE did not appear to perform a thorough and independent evaluation of PG&E’s compliance:

- In validating PG&E’s completion of its WMP activities, the IE relied heavily on interviews with PG&E’s subject matter experts (SMEs) and on PG&E’s past filings.
- In regards to PG&E’s compliance, the IE did not request sufficient additional records and documentation to independently verify compliance.
- Regarding PG&E’s costs for its initiatives, PG&E provided the IE with changed 2020 planned costs for initiatives.

Energy Safety should take into account the lack of thorough review and independent verification of PG&E’s compliance with its 2020 WMP when reviewing the IE ARC pursuant to Public Utilities Code § 8386.3(c)(2)(B), and when establishing guidelines for reports in future years.

¹⁶ IE ARC for SCE, p. 33.

¹⁷ IE ARC for PG&E, p. 109. Note, the IE report refers to 346 “initiatives” but counts some WMP-defined initiatives multiple times for the purposes of WMP activity completion, verification of QA/QC programs, and verification of funding. The complete list is included in Appendix G of the IE ARC.

¹⁸ IE ARC for PG&E, p. 4.

2. The IE for PG&E relied on PG&E SME interviews and prior PG&E filings rather than independent review of records.

Of the 346 items the IE identified for their review, 134 were classified as “WMP Activity Completion,” 134 as “Verification of Quality Assurance/Quality Control (QA/QC) Programs,” and 78 as “Verification of Funding.”¹⁹

Within the category of WMP Activity Completion, 2 items were found to be not applicable, and 16 were not assessed due to time constraints.²⁰ Of the remaining 116 items, 52 (45%) were validated solely through interviews with SMEs with no additional independent review of records to verify the SME’s statements.

While an interview with a PG&E SME could be a valuable method for understanding PG&E’s approach to an activity, it is not a substitute for validating that PG&E’s WMP activities were completed and executed in accordance with all applicable work procedures and protocols, as required by the IE Scope of Work published in April 2021.²¹ In addition, it is not clear how thorough the SME interviews were. While the IE does include a summary of the interviews the IE conducted,²² the report does not include transcripts or even the length of the interviews.

In addition to SME interviews, the IE frequently referenced information from prior PG&E regulatory filings such as Quarterly Initiative Updates, PG&E’s 2021 WMP, advice letters, and PG&E’s 2021 Annual Report on Compliance published in March 2021. For example, for initiative “5.3.3.1 Capacitor maintenance and replacement program,” the IE found PG&E “compliant with the 2020 WMP, per 2021 Q1 QIU and 2021 WMP capacitor inspection and maintenance is ongoing on an annual basis.” Similarly, for “5.3.3.12-3 Wildfire Safety Inspection Program Distribution Repair Work” the IE found PG&E “compliant with the 2020 WMP, 2020 Q4 QIU, 2021 Q1 QIU.”

That the IE relied so heavily on SME interviews and PG&E’s prior regulatory filings, rather than performing an independent review of records and documentation, raises concern over the thoroughness and independence of the IE’s evaluation of PG&E’s compliance with its 2020 WMP.

¹⁹ IE ARC for PG&E, Appendix G – Conclusion Table.

²⁰ IE ARC for PG&E, Appendix G – Conclusion Table.

²¹ *Final Independent Evaluator Scope of Work for the Review of Compliance with 2020 WMP*, April 21, 2021, pp. 3-4.

²² “IE ARC for PG&E, Appendix D – SME Interview Summary.

3. The IE for PG&E did not request sufficient documentation to perform independent verification of compliance.

The final IE scope of work published on April 21, 2021 lists the approaches IEs “shall”²³ take to verify compliance for various categories of goals or targets. For all categories, this includes seeking additional documentation as necessary to verify activities were completed in compliance with the utility’s WMP.²⁴ However, as stated previously, the IE for PG&E relied heavily on SME interviews and PG&E’s past filings, rather than independent review of records and documentation.

In a number of cases, the IE accepted the SME’s input on topics such as hiring,²⁵ installation of technology pilots,²⁶ asset maintenance and replacement,²⁷ and others, without reviewing relevant records and documentation to verify the SME’s statements. In other cases, the IE validated only the existence of various grid design and system hardening initiatives, but did not “request documentation needed to verify the activity was completed as stated in the WMP.”²⁸

For example, the IE does not reference any records related to cross-arm maintenance, repair, and replacement,²⁹ distribution pole replacement and reinforcement,³⁰ or transformers maintenance and replacement.³¹ Without sampling records to determine whether activities were appropriately executed, it is impossible for the IE to adequately assess PG&E’s compliance with its WMP.

²³ According to *Ballantine’s Law Dictionary*, “shall” is ordinarily “a word of mandate, the equivalent of ‘must,’ where appearing in a statute” and should be construed as mandatory in this context as well.

²⁴ *Final Independent Evaluator Scope of Work for the Review of Compliance with 2020 WMP*, April 21, 2021, pp. 2-6.

²⁵ “The IE conducted a SME Interview on June 4th with Ben Almario, Director Wildfire Safety Operations (Appendix D Item No. 28 and 32), where the director described the increase in total staff members to 102, which exceeded the 2020 WMP target of 98 crew members.” IE ARC for PG&E, p. 30.

²⁶ “PG&E 2020 Q4, QIU, 03/31/2021, PG&E installed pilots in 2020. Appendix B Item No. 53.” IE ARC for PG&E, p. 36.

²⁷ “Per 2020 WMP section 5.3.3.1 and 2021 WMP section 7.3.3.1 capacitor inspection and maintenance is carried out on an ongoing annual basis. PG&E 2021 Q1 QIU, Appendix B Item No. 7.” IE ARC for PG&E, p. 38.

²⁸ *Final Independent Evaluator Scope of Work for the Review of Compliance with 2020 WMP*, April 21, 2021, p. 5.

²⁹ IE ARC for PG&E, p. 38.

³⁰ IE ARC for PG&E, p. 39.

³¹ IE ARC for PG&E, p. 40.

4. The IE’s review of PG&E’s WMP funding is disproportionately based on PG&E’s reports only.

In reviewing PG&E’s funding of its WMP initiatives, the IE primarily referenced PG&E’s annual compliance report published in March 2021, and a variance explanation spreadsheet PG&E provided on June 9, 2021.³² The IE did not request additional financial documentation, nor did it review “all available financial audit reports and memorandum accounts” as described in the scope of work.³³

The IE noted that for several initiatives, the variance spreadsheet from PG&E revised the 2020 budgets and changed the amounts stated in its 2020 WMP.³⁴ For the utility to alter planned 2020 budgets for initiatives when the review of the initiatives has already passed renders the review less meaningful. The IE report gives no explanation for why PG&E changed 2020 budgets in 2021, nor did the IE document and report if it questioned PG&E’s practice.

5. The IE report identifies PG&E’s high rate of noncompliance with critical WMP initiatives.

In the IE’s review of inspection records for 800 distribution poles from PG&E, of which PG&E provided only 315 records,³⁵ the IE found discrepancies between what was recorded on the inspection form and what could be seen in the accompanying photos in approximately 8 percent of the records.³⁶ These discrepancies included issues such as incorrect voltage recorded on the form, incorrect recording of the number of conductors or pieces of equipment attached to the pole, poles incorrectly marked as idle, and other issues.³⁷ The IE notes that PG&E’s targeted inspecting 339,728 distribution poles in 2020. However, if the records the IE reviewed form a representative sample, then approximately 27,000 poles may have been inadequately inspected in 2020.³⁸

³² IE ARC for PG&E, p. 47.

³³ *Final Independent Evaluator Scope of Work for the Review of Compliance with 2020 WMP*, April 21, 2021, p. 5.

³⁴ For example, “This 2020 WMP Activity/Initiative spend, per the ARC Report, shows a budget underspent of \$191.85 million. Per SME interview conducted on June 8th with Christopher Wong, Principal, Business Finance and Jack Liu, Business Planning Expert per Appendix D Item No. 88 and PG&E’s variance explanation spreadsheet received on June 9th, 2021 titled: IE Analysis 2020 Actual vs. 2020 Plan v2, the budget amount was reduced from \$284.01 million to \$108.44 million, still resulting in an underspent amount by \$16.28 million.” ARC for PG&E, p. 48.

³⁵ IE ARC for PG&E, p. 22.

³⁶ IE ARC for PG&E, p. 22.

³⁷ IE ARC for PG&E, Appendix F – Analysis of Inspection Documents.

³⁸ Per IE ARC for PG&E, p. 22, PG&E targeted inspecting 339,728 poles. The IE found discrepancies on 25 records out of 313 that could be reviewed, or 8.0%. 8.0% of 339,728 is 27,134.

In the IE's field assessment of 1,381 Enhanced Vegetation Management (EVM) locations, they found that approximately 7.6 percent of the locations had "no evidence of vegetation management activities."³⁹ PG&E's claims that it performed work verification on 100 percent of all EVM activities,⁴⁰ are belied by the fact that the IE was unable to find any evidence of Vegetation Management (VM) work in 105 out of 1,381 locations (approximately equivalent to 1 out of every 13 locations).⁴¹ While PG&E separately claimed that the VM compliance rate was greater than 96 percent,⁴² the IE notes that "there was no clear explanation of the non-complying activities and how they were overlooked in the work verification."⁴³

Pursuant to Public Utilities Code § 8386.3(c)(4), Energy Safety is required to complete its own compliance review within 18 months after the submission of PG&E's compliance report. In the course of this review, Energy Safety should further investigate the reasoning for PG&E's high rate of noncompliance in its distribution pole inspections and EVM initiatives in 2020.

C. Issues with the IE report for SCE.

The IE for SCE conducted an assessment of SCE's eighty-seven 2020 WMP initiatives. Of these initiatives, the IE prioritized 28 initiatives based on its determination that those activities had the highest impact to risk.⁴⁴ Of these 28 initiatives, the IE conducted record or field inspections for 25 initiatives.⁴⁵ In addition, the IE conducted an assessment of funding underruns, in which SCE spent less than the amount it forecasted for a particular mitigation, and SCE's Quality Assurance/Quality Control (QA/QC) process.⁴⁶ As detailed above, the lack of time for the IE to review SCE's WMP had numerous effects on the assessment process, from limiting the assessment to 25 initiatives to limiting the thoroughness with which the IE could investigate SCE's progress. These resulting impacts are discussed in more detail below.

³⁹ IE ARC for PG&E, pp. 91-92.

⁴⁰ "The one exception to the sampling discussed above is the EVM program where 100% of work completed is thoroughly reviewed through a work verification effort wherein all miles reported as completed by the assigned tree crew are then re-inspected to be validated as properly completed to EVM standards. If any trees were not managed to program scope then rework is assigned for completion before work verification is completed." PG&E's 2020 WMP Updated, February 28, 2020, p. 5-191.

⁴¹ IE ARC for PG&E, p. 91.

⁴² IE ARC for PG&E, p. 100.

⁴³ IE ARC for PG&E, p. 100.

⁴⁴ IE ARC for SCE, p. 13.

⁴⁵ IE ARC for SCE, p. 110-114.

⁴⁶ Cost underrun refers to when the actual spend on an activity is less than the forecasted spend.

1. The IE’s field verification of SCE’s compliance was incomplete.

In many cases, the IE determined that it could not conduct adequate field verifications given the amount of time at its disposal. For example, in its assessment of weather station deployment the IE stated that it “proposed to sample a population of weather stations during patrolled field inspections, however, time constraints prevented this validation.”⁴⁷ Additionally, the IE chose not to conduct field verification of distribution, transmission, and generation remediations that SCE performed in 2020, stating that “no additional field activities substantiated this review as the scope was limited to a specific listing of assets that did not comprise remediation activities stipulated in SCE’s WMP Initiative Activity description.”⁴⁸ It is unclear why field verification of remediation work would be considered outside the scope of work for the IE report. Similarly, it is unclear why the scope was limited to assets not related to the WMP Initiative Activity description, given that the intent of this evaluation is to evaluate WMP initiatives. OEIS should provide guidance to the IEs that they must conduct field verification of remediation work.

2. The IE’s review of SCE’s records was incomplete.

The IE report did not conduct thorough record reviews of SCE’s WMP initiatives, and there were multiple instances where the IE stated that it failed to follow up on an identified deficiency in SCE’s data. For example, in its evaluation of SCE’s data regarding covered conductor, the IE noted that the provided data did not include information on work dates or circuit miles worked.⁴⁹ The IE failed to conduct interviews with SCE staff or conduct a thorough review of work orders to validate that information.⁵⁰

As a result, there were discrepancies that IE discovered during its field survey of 23 locations where covered conductor was installed in 2020. The IE discovered from SCE staff onsite that at one location the covered conductor had been installed the day prior to the IE’s visit.⁵¹ At another covered conductor location the IE noted that the covered conductor was probably not installed in 2020.

The IE’s review of SCE’s Tree Attachment Remediation also led to issues that the IE failed to adequately address within the allotted time. The IE stated that it could not verify

⁴⁷ IE ARC for SCE, p. 20.

⁴⁸ IE ARC for SCE, p. 27.

⁴⁹ IE ARC for SCE, p. 21.

⁵⁰ IE ARC for SCE, p. 21.

⁵¹ IE ARC for SCE, p. 21.

recorded costs of the remediation samples.⁵² The IE speculates as to why that cost data was not available, but ultimately states that “such evidence has not been provided and the IE did not have an opportunity to issue a follow-up data request on this subject.”⁵³

The IE also had issues conducting records reviews of distribution and transmission aerial inspections. While the IE has “reasonable assurance SCE has performed full aerial inspections,” the IE failed to conduct a detailed review of work order accounts.⁵⁴

3. The IE’s review of SCE’s funding was incomplete.

The IE appears to have entirely relied on SCE’s own 2020 WMP ARC for information on cost underruns and explicitly stated they were unable to request additional documentation to explain cost underruns due to time constraints.⁵⁵ Because of this the IE summary of SCE’s cost underruns is limited to only those variances that SCE reported on in its ARC, which only includes cases where the cost variance is greater than \$1 million. Even the explanations in the IE report for why the cost underruns exist are identical to the explanations provided by SCE in its ARC.⁵⁶ This level of scrutiny does not provide additional value to stakeholders or to Energy Safety.

4. The extent of the IE’s review of SCE’s QA/QC is unclear.

It is unclear to what extent the IE reviewed SCE’s QA/QC process. Again the IE mentioned that it gathered what information it could given the time constraints that it had to work with.⁵⁷ In addition to interviewing SCE staff and reviewing SCE’s summaries and descriptions, the IE states that it reviewed several samples of SCE QA/QC work products.⁵⁸ However, the IE does not provide details as to what number of samples were viewed, what types of QA/QC samples were reviewed, and what the findings of those QA/QC work products were. As a result, it is unclear how much of the IE’s assessment of SCE’s QA/QC process is based on the review of SCE’s work product and how much was based on qualitative sources such as interviews with SCE staff and descriptive materials.

⁵² IE ARC for SCE, p. 25.

⁵³ IE ARC for SCE, p. 25.

⁵⁴ IE ARC for SCE, p. 34-35.

⁵⁵ IE ARC for SCE, p. 47.

⁵⁶ SCE 2020 ARC, Attachment C: SCE 2020 WMP Cost Variance Explanation.

⁵⁷ IE ARC for SCE, p. 53.

⁵⁸ IE ARC for SCE, p. 53.

D. Issues with SDG&E's IE Report

The IE report for SDG&E suffered from the same lack of time to conduct the review as the reports for PG&E and SCE. As a result, the IE's ability to conduct field verification was significantly hampered, and its review of SDG&E's QA/QC programs was cursory.

For example, access issues prevented field verification in 94 instances, totaling 25% of the sites selected for the IE's planned field verification program.⁵⁹ This severely curtailed the scope of the verification program and makes the validity of any extrapolation of its findings to SDG&E's system as a whole questionable.

Next, review of SDG&E's QA/QC programs was minimal. The IE states that it "was not able to conduct a comprehensive review of and analysis of SDG&E's QA/QC programs."⁶⁰ Instead, the report states "that these programs exist was verifiable" through SDG&E's reports and through "anecdotal reference" during SME interviews.⁶¹

Finally, as addressed below the report raised a number of potential issues which may call for further scrutiny in the future.

1. The IE for SDG&E identifies several areas which call for further investigation.

In addition to the issues described above, the IE report surfaced several other areas of concern which call for further investigation. SDG&E should address these findings in its response to the report, and the issues should be investigated further if SDG&E's response does not resolve the concern.

- The IE report notes that 12 of 16 field reports of inspections of SCADA capacitors showed "significant vegetation encroachment."⁶²
- The IE report notes possible inaccuracies in SDG&E's work orders for grid hardening and VM initiatives.
 - The report states that in system hardening reports provided by SDG&E, "multiple items on the same work order were listed multiple times for the same work type. In some cases, the list

⁵⁹ In these locations, "the field crew experienced access issues since the assets were located in private properties or in natural reserves." IE ARC for SDG&E, p. 21.

⁶⁰ IE ARC for SDG&E, p. 40.

⁶¹ IE ARC for SDG&E, p. 40.

⁶² IE ARC for SDG&E, p. 28.

called out 4, 6, or 8 fuses and only 2 or 4 fuses existed on the pole.”⁶³

- IE review of VM work order showed similar issues. The report states that SDG&E produced “multiple work orders for the same poles and/or poles and trees adjacent.”⁶⁴ The IE reviewed 81,555 work orders and found that in some cases “multiple work orders were assigned to the same tree, on a given date, for what it seems the same task.”⁶⁵

IV. CONCLUSION

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed herein. Please contact Nathaniel Skinner (Nathaniel.Skinner@cpuc.ca.gov) or Matthew Karle (Matthew.Karle@cpuc.ca.gov) with any questions relating to these comments.

Sincerely,

/s/ CAROLYN CHEN

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⁶³ IE ARC for SDG&E, p. 21.

⁶⁴ IE ARC for SDG&E, p. 26.

⁶⁵ IE ARC for SDG&E, p. 26.