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BY ENERGY SAFETY E-FILING

Melissa Semcer
Deputy Director, Electric Infrastructure Directorate
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: **Comments of Pacific Gas and Electric Company on Draft Decision**
Docket: 2022-WMPs

Dear Deputy Director Semcer:

Pacific Gas and Electric Company (PG&E) respectfully submits these comments on the Draft Decision of the Office of Energy Infrastructure Safety (Energy Safety) on PG&E's 2022 Wildfire Mitigation Plan Update (WMP).

PG&E appreciates Energy Safety's approval of the 2022 WMP and the areas of significant progress identified by Energy Safety in the Draft Decision. As a result of the efforts and focus of our employees and contractor partners, we have been able to achieve substantial progress toward reducing wildfire risk in the communities that we serve. As the Draft Decision notes, we have made significant progress in risk modeling and risk assessment, performing work on the highest risk circuits, installing weather stations and cameras across our service territory for increased visibility, replacing equipment such as expulsion fuses that can create ignition risk, installing sensors on equipment, improving our asset management and recordkeeping, and progressing our development of emergency planning and preparedness programs.

We also recognize the areas of continued improvement identified in the Draft Decision including addressing a backlog of repairs, the quality of our asset inspections, continuing to mature our vegetation management programs, continuing to implement our undergrounding program, providing additional detail regarding our Enhanced Powerline Safety Setting (EPSS) program, and collaborating with other utilities. We have carefully reviewed each of the areas of continued improvement identified by Energy Safety and will be addressing these areas going forward.

We fully support Energy Safety's approval of the 2022 WMP, which was based on the extensive materials and information submitted by PG&E and Energy Safety's comprehensive review of these materials.

The Draft Decision included 35 areas of continued improvement with requirements for information to be provided in the 2023 WMP to address each of these areas. In the remainder of these comments, we are providing feedback on several of the Areas of Continued Improvement that require clarification or modification.

Area of Continued Improvement	Clarification or Modification
<p><u>PG&E-22-17</u>: Future Quantitative Targets to Reduce the Backlog of Repair Tags</p>	<p><u>Modification</u>: The required progress for the 2023 WMP should be modified to state that the targets are for backlog tags in High Fire Threat Districts (HFTD) or High Fire Risk Areas (HFRA) and which have been designated as ignition risk tags.¹</p> <p>Because ignition risk tags in HFTD and HFRA areas present the greatest wildfire risk, we believe this Area of Continued Improvement should be modified to focus on a plan which addresses these tags. This proposed modification is consistent with PG&E-22-22 which requires a resource plan for closing work orders “in the HFTD.” We propose the following language be modified to state:</p> <p style="padding-left: 40px;">Required Progress: In its 2023 WMP, PG&E must provide quantitative targets for addressing repairs for infractions found during inspections, broken down by severity level of the finding, accounting for the entire backlog <u>ignition risk tags in HFTD/HFRA areas</u>.</p>
<p><u>PG&E-22-34</u>: Revise Process of Prioritizing Wildfire Mitigations</p>	<p><u>Clarification and Modification</u>: This Area for Continued Improvement asks PG&E to incorporate risk model outputs and RSE estimates early in our mitigation decision-making process and to decrease the use of feasibility as a first step in deciding mitigation initiatives.</p> <p>PG&E would like to respectfully clarify that the first step we perform when planning system hardening work is to identify locations based on Wildfire Distribution Risk Model outputs rather than feasibility. Thus, quantitative risk attributes are first in the prioritization process and weighted heavily. Once locations have been identified for work based on risk, the next step is to consider cost, which is informed by a feasibility multiplier. Feasibility is an important criterion because it directly impacts the duration of project execution, which drives the cost of a project. In these ways, we currently incorporate risk model outputs and spend efficiency calculations, including feasibility, in our system hardening planning process.</p> <p>We recognize that further information on this topic may be helpful for Energy Safety and other stakeholders in future WMPs. Accordingly, based on the clarification provided, we propose that the Area for Continued Improvement language be modified as follows:</p> <p style="padding-left: 40px;">Required Progress: In its 2023 WMP, PG&E must</p>

¹ “Ignition risk” tags are maintenance tags that have been determined to have a failure mode associated with some form of ignition risk as a result of the non-conformance identified on the tag (e.g., conductor or structural support deficiency).

Area of Continued Improvement	Clarification or Modification
	<p>incorporate <u>further explain how</u> RSE estimates and risk model outputs early <u>are incorporated</u> in the decision-making process and base its <u>how these factors affect</u> prioritization on the estimated effectiveness of overall combinations of mitigation measures to address location-specific risks. This must include decreasing the <u>an explanation of</u> the importance of feasibility for undergrounding as a first step when deciding which initiative to select and instead demonstrate effectiveness for risk reduction as a driving factor.</p>
<p><u>PG&E-22-35</u>: Quantify Mitigation Benefits of Reducing PSPS Scale, Scope, and Frequency</p>	<p><u>Clarification and Modification</u>: We understand that the purpose this Area of Continued Improvement is to quantify the benefits of certain mitigations at reducing the scale, scope, and frequency of Public Safety Power Shutoff (PSPS) events. We understand the first and third bullets, but the information that is specifically being requested in the second bullet point is unclear. We understand the second bullet is seeking to understand how mitigations impacted PSPS events reported in the Quarterly Data Report. We would suggest revising the second bullet to state:</p> <ul style="list-style-type: none"> • Identify how WMP mitigations were utilized in each of the PSPS events identified in the Quarterly Data Report (e.g., how many PSPS customers mitigated utilizing switches installed.)

We appreciate the opportunity to provide these comments and look forward to continuing to work with Energy Safety, the California Public Utilities Commission, PG&E’s safety monitor, and interested parties as a part of our ongoing effort to continue to reduce wildfire risk and to support our stand that catastrophic wildfires shall stop.

Very truly yours,

/s/ Jay Leyno

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