



November 7, 2022

**Via Electronic Filing**

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**Subject: Public Advocates Office Reply Comments on the Draft Decision Approving PG&E's 2022 Wildfire Mitigation Plan Update**

**Docket: 2022-WMPs**

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits the following reply comments on the Draft Decision of the Office of Energy Infrastructure Safety (Energy Safety) approving Pacific Gas and Electric Company's (PG&E) 2022 Wildfire Mitigation Plan Update. We urge Energy Safety to adopt the recommendations discussed herein.

Sincerely,

/s/ ***Carolyn Chen***

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## I. INTRODUCTION

On February 25, 2022, Pacific Gas and Electric Company (PG&E) submitted its annual wildfire mitigation plan (WMP) update for 2022. On October 6, 2022, Energy Safety issued its *Draft Decision on 2022 Wildfire Mitigation Plan Update: Pacific Gas and Electric Company* (Draft Decision).<sup>1</sup> On October 26, 2022, PG&E,<sup>2</sup> Cal Advocates,<sup>3</sup> and the Green Power Institute (GPI)<sup>4</sup> submitted comments on the Draft Decision. Pursuant to the Draft Decision and the *Final 2022 Wildfire Mitigation Plan (WMP) Update Guidelines* (2022 WMP Guidelines),<sup>5</sup> stakeholders may submit reply comments by November 7, 2022.

In these comments, Cal Advocates makes the following recommendations:

- Energy Safety should reject PG&E’s proposed modifications to the areas for continued improvement PG&E-22-17 and PG&E-22-34.
- Energy Safety should adopt GPI’s proposed modifications to area for continued improvement PG&E-22-16.

## II. COMMENTS

### A. **Energy Safety should reject PG&E’s proposed modifications to the Draft Decision’s requirements for asset maintenance targets (PG&E-22-17).**

PG&E proposes that Energy Safety modify PG&E-22-17 to require it to provide quantitative targets only for “ignition risk tags”<sup>6</sup> in the High Fire Threat Districts (HFTD) and High Fire Risk Areas (HFRA), rather than for all overdue tags.<sup>7</sup> However, PG&E’s proposal

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<sup>1</sup> *Draft Decision on 2022 Wildfire Mitigation Plan Update: Pacific Gas and Electric Company*, October 6, 2022 (Draft Decision).

<sup>2</sup> *Comments of Pacific Gas and Electric Company on Draft Decision*, October 26, 2022.

<sup>3</sup> *Public Advocates Office Comments on the Draft Decision Approving PG&E’s 2022 Wildfire Mitigation Plan Update*, October 26, 2022.

<sup>4</sup> *Comments of the Green Power Institute on the OEIS Draft Decision on PG&E’s 2022 WMP Update*, October 26, 2022.

<sup>5</sup> Energy Safety, *Final 2022 Wildfire Mitigation Plan (WMP) Update Guidelines*, Docket 2022-WMPs, December 15, 2021. See Attachment 5: Guidelines for Submission and Review of 2022 Wildfire Mitigation Plan Updates, pp. 5-6.

<sup>6</sup> The term “ignition risk tags” was originally defined by PG&E and has not been adopted by Energy Safety. *Pacific Gas and Electric Company 2022 Wildfire Mitigation Plan Response to Revision Notice*, July 11, 2022 (PG&E’s 45-day Response), critical issue RN-PG&E-22-05, pp. 41-42.

<sup>7</sup> *Comments of Pacific Gas and Electric Company on Draft Decision*, October 26, 2022, p. 2.

does not address the Draft Decision’s requirement that PG&E come into compliance with the California Public Utilities Commission’s General Order (GO) requirements regarding its maintenance backlog.<sup>8</sup> As the Draft Decision notes, PG&E is not in compliance with GO 95 requirements regarding asset maintenance.<sup>2</sup>

PG&E states that ignition risk tags in the HFTD and HFRA present the greatest wildfire risk. PG&E is correct that it should prioritize the tags that present the greatest ignition risk first. However, PG&E’s proposal would allow it to inappropriately defer remediation of the remainder of its substantial and noncompliant maintenance backlog through the end of 2032.<sup>10</sup>

Instead, Energy Safety should continue to require PG&E to provide quantitative targets to address its entire backlog, rather than limiting such targets to PG&E’s self-identified “ignition risk tags,” to achieve compliance with General Order requirements.<sup>11</sup> Energy Safety should therefore reject PG&E’s proposed modification to PG&E-22-17.

Additionally, in opening comments both Cal Advocates and GPI recommend that Energy Safety require PG&E to resolve its entire maintenance backlog by the end of the 2023-2025 WMP cycle at the latest, thereby coming fully into compliance with GO 95.<sup>12</sup> Energy Safety should adopt these recommendations.

**B. Energy Safety should reject PG&E’s proposed modifications to the Draft Decision’s requirements for risk-based decision-making (PG&E-22-34).**

In the Draft Decision, PG&E-22-34 sets out requirements for PG&E to improve how it selects mitigation measures. The required progress includes, among other things, using risk-spend efficiency (RSE) analysis and decreasing the focus on undergrounding feasibility.

In comments, PG&E proposes modifications to PG&E-22-34 that would substantially change the Draft Decision’s required progress. For example, PG&E proposes only to “further

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<sup>8</sup> PG&E-22-22, Draft Decision, p. 178.

<sup>2</sup> “Because of its backlog, PG&E is not currently complying with relevant GOs.” Draft Decision, p. 93. See also *Public Advocates Office Comments on the Draft Decision Approving PG&E’s 2022 Wildfire Mitigation Plan Update*, October 26, 2022, pp. 5-6.

<sup>10</sup> PG&E’s 45-day Response, critical issue RN-PG&E-22-05, pp. 42-43.

<sup>11</sup> PG&E-22-22, Draft Decision, p. 178.

<sup>12</sup> *Public Advocates Office Comments on the Draft Decision Approving PG&E’s 2022 Wildfire Mitigation Plan Update*, October 26, 2022, pp. 5-6 and *Comments of the Green Power Institute on the OEIS Draft Decision on PG&E’s 2022 WMP Update*, October 26, 2022, pp. 3-4.

explain” how it incorporates RSE estimates and risk model outputs into its decision-making process, instead of strengthening the role of these analytical tools in its decision-making. Similarly, PG&E proposes to “include an explanation of the importance of feasibility for undergrounding”<sup>13</sup> rather than “decreasing the importance” of this consideration as the Draft Decision requires.<sup>14</sup> However, as Energy Safety notes, “PG&E’s decision-making process heavily favors undergrounding” and is “particularly driven by whether undergrounding is feasible.”<sup>15</sup> Simply explaining its choices will do nothing to remediate this critical flaw in PG&E’s decision-making process.

An objective deliberative process must consider the feasibility of all mitigation options, not only a predetermined favorite. However, PG&E’s analysis *starts* at reviewing feasibility of undergrounding – which should be one part but not the entirety of the decision-making process.<sup>16</sup> Only if undergrounding is infeasible does PG&E choose another mitigation strategy.<sup>17</sup> Thus, rather than performing a thorough analysis of various options and choosing the most risk-spend efficient mitigation,<sup>18</sup> PG&E narrowly pursues its preferred mitigation of undergrounding unless it is forced to take another route by factors outside of PG&E’s control.

The Draft Decision reasonably requires PG&E to correct its deficient process. PG&E’s proposed modifications would substantially weaken the required progress, and result in PG&E providing justifications instead of making corrections. Energy Safety should therefore reject PG&E’s proposed modifications.

Furthermore, as Cal Advocates recommends in opening comments, Energy Safety should impose additional remedies in PG&E-22-34 to require PG&E to justify its decisions to

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<sup>13</sup> *Comments of Pacific Gas and Electric Company on Draft Decision*, October 26, 2022, pp. 2-3.

<sup>14</sup> PG&E-22-34, Draft Decision, p. 183.

<sup>15</sup> Draft Decision, p. 143.

<sup>16</sup> As PG&E recognizes, feasibility is an important criterion that drives the duration and cost of an undergrounding project. *Comments of Pacific Gas and Electric Company on Draft Decision*, October 26, 2022, p. 2.

<sup>17</sup> “Currently, PG&E’s decision-making process is particularly driven by whether undergrounding is feasible; if undergrounding is not feasible, another mitigation strategy is chosen.” Draft Decision, p. 143.

<sup>18</sup> “PG&E did not provide a thorough analysis of other mitigation options to demonstrate how alternatives factor into its decision-making process.” Draft Decision, p. 143.

underground 10,000 miles.<sup>19</sup> These recommendations complement the required progress Energy Safety has provided in the Draft Decision.

**C. Energy Safety should adopt GPI’s proposed modifications to the Draft Decision’s requirements for planning undergrounding projects (PG&E-22-16).**

Energy Safety finds that PG&E did not provide a thorough analysis of alternative mitigations to undergrounding in its 2022 WMP.<sup>20</sup> As Cal Advocates has previously discussed, while undergrounding is highly effective at reducing risk, it is an extremely expensive and the most time-consuming option.<sup>21</sup>

In our comments on the Draft Decision, we recommend that Energy Safety require PG&E to conduct a rigorous, quantitative analysis of alternative mitigations for each undergrounding project.<sup>22</sup> GPI proposed a similar requirement, requesting that Energy Safety require PG&E to demonstrate that “undergrounding is risk-spend efficient at the project level when compared to other grid hardening efforts.”<sup>23</sup> GPI’s recommendations complement those of Cal Advocates, and would drive transparency and efficient risk mitigation by PG&E. Energy Safety should adopt GPI’s proposed modifications to PG&E-22-16.

**III. CONCLUSION**

Cal Advocates respectfully urges Energy Safety to adopt the recommendations discussed herein. For any questions relating to these comments, please contact Henry Burton ([Henry.Burton@cpuc.ca.gov](mailto:Henry.Burton@cpuc.ca.gov)) or Holly Wehrman ([Holly.Wehrman@cpuc.ca.gov](mailto:Holly.Wehrman@cpuc.ca.gov)).

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<sup>19</sup> *Public Advocates Office Comments on the Draft Decision Approving PG&E’s 2022 Wildfire Mitigation Plan Update*, October 26, 2022, pp. 7-8.

<sup>20</sup> Draft Decision, p. 143.

<sup>21</sup> *Comments of the Public Advocate’s Office on the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities Docket 2022-WMPs*, April 11, 2022, pp. 13-17.

<sup>22</sup> *Public Advocates Office Comments on the Draft Decision Approving PG&E’s 2022 Wildfire Mitigation Plan Update*, October 26, 2022, pp. 7-8.

<sup>23</sup> *Comments of the Green Power Institute on the OEIS Draft Decision on PG&E’s 2022 WMP Update*, October 26, 2022, p. 14.

Respectfully submitted,

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