RURAL COUNTY REPRESENTATIVES OF CALIFORNIA

May 26, 2023

Caroline Thomas Jacobs
Director, Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Electronically Filed to Docket # 2023-2025-WMPs

RE: Opening Comments of the Rural County Representatives of California on Large Investor-Owned Utility 2023-2025 Wildfire Mitigation Plans

Dear Director Thomas Jacobs:

On behalf of the Rural County Representatives of California (RCRC), I am pleased to provide comments on the large investor-owned utility (IOU) 2023-2025 Wildfire Mitigation Plans (WMPs).[1] RCRC is an association of forty rural California counties, and our Board of Directors is comprised of elected supervisors from each member county. While Pacific Gas and Electric's (PG&E's) service territory encompasses the vast majority of our member counties, Southern California Edison's (SCE's) service territory also comprises some of our member counties and both of their respective WMPs are the general focus of our comments.

Safeguarding California's residents from future harm resulting from a utility-caused wildfire event is one of RCRC's primary public policy goals. Communities across California have experienced great financial hardships in attempting to recover from catastrophic wildfire events and in mitigating the risk of consequences of those events, including implementing home hardening measures, maintaining defensible space, and suffering economic (as well as health-related) fallout from persistent power outages. These Plans are vital to drive thoughtful investments and preserve the quality of life and natural resources of our state.

Grid Design and System Hardening

Sectionalizing Devices and Fast Trip Settings

[1] PG&E's 2023-2025 Wildfire Mitigation Plan, submitted 03/27/2023; and 2023-03-27_SCE_2023_WMP_R0

Loss of power poses a significant danger to public safety and wellbeing. RCRC's member counties operate many critical facilities and provide vital services, including law enforcement facilities, fire stations, jails, emergency dispatch centers, health facilities, cooling centers, water and wastewater treatment and distribution infrastructure, etc. Rural communities often lack the resources necessary to fully mitigate the impacts of electrical outages on critical infrastructure and sensitive populations, especially when those outages impact large numbers of individual and facilities and come frequently without warning.

As an initial matter, RCRC does not oppose the reasonable use of fast-trip settings to reduce the risk of igniting wildfires. However, RCRC continues to be concerned with the execution of these programs in real time and has requested there be more uniform regulatory parameters and oversight of the implementation of this mitigation tool, especially given the growing reliance of utilities to use this as a long-term mitigation measure. PG&E, for example, intends to use their Enhanced Powerline Safety Settings (EPSS) program as a primary mitigation measure, which is troubling given the disastrous "pilot" phase and multitude of customers disruptions that continue to occur as the EPSS footprint expands beyond Tier 3 High Fire Threat Districts. In 2022, there were nearly 2,400 EPSS outages in PG&E service territory, with some circuits experiencing 20 outages over the course of the year and some seeing as many as 7 outages within a single month. While PG&E made some program changes to reduce the number of customers impacted per outage and reduce the average outage duration, many circuits continued to experience widespread outages for 16 hours or more even through the end of 2022. While we appreciate EPSS is intended to reduce the risk of utility-caused wildfire, this cannot continue. RCRC remains deeply troubled that PG&E has stated it expects just a 2% reduction in the number of EPSS outages year over year. That means PG&E's customers can expect another 2,200+ short, medium, and long duration EPSS outages during 2023 and still more than 2,000 in 2024. PG&E must do more to ensure it can safely and ***reliably*** provide power to its customers. We appreciate that its 10,000-mile undergrounding program is intended to help increase reliability and reduce wildfire risk, but it remains unclear just how many of those high-EPSS-risk circuits will be included in those undergrounding plans.

We understand that both PG&E and SCE dispute fast-trip settings being characterized to *cause* outages, however, the impacts of these programs through the sensitivity of the program's settings (wholly controlled by the individual utility) have, in PG&E's case, ultimately resulted in more unplanned power outages on customers than what would have otherwise occurred, evidenced by the greater numbers of outages from "unknown" causes. According to PG&E's EPSS reports provided to the CPUC, in 2022 nearly half of outages from EPSS did not have an identifiable cause.

Furthermore, we dispute PG&E's overarching characterizations that EPSS outages are brief or benign. The situation on-the-ground is much worse than it appears in PG&E's monthly reports to the CPUC, which rely on data averages that skew what is

occurring on the most frequently impacted circuits. When outages occur, utilities should report on the total restoration time. According to the CPUC's most recent Independent Monitor Report[2], PG&E's EPSS program has contributed to PG&E's standing in the bottom 25% for reliability in comparison to other electric utilities across the nation.[3] PG&E's unplanned distribution System Average Interruption Duration Index (SAIDI) increased by an additional 66% since 2020[4], which omits the October 2019 Public Safety Power Shut-offs (PSPS) that affected hundreds of thousands of customers, or approximately 2 million people. This trend is unsustainable and continues to overburden rural customers specifically. For these reasons, we cannot take at face value PG&E's assertions that these outages would have occurred otherwise.

As more customers come to rely on temporary backup generators, public safety concerns escalate given the fire and carbon monoxide dangers portable generators can pose if not used or supervised properly. RCRC appreciates that PG&E has expanded customer solutions to eligible EPSS-affected customers. In particular, the Backup Power Transfer Meter is a promising solution for customers to safely use personal generators.

Covered Conductor

While it is no secret that PG&E and SCE have different preferred capital improvements projects to reduce wildfire risk (undergrounding vs. covered conductor, respectively), there must be a reconciliation to ensure the costs and benefits of covered conductor installation are consistently measured and applied across utility service territories. It remains unclear why PG&E excludes the installation of covered conductor as a criterion to reduce PSPS risk.[5] In contrast, SCE has determined that covered conductor has a 90% reduction in PSPS activations.[6] If aggressive deployment of covered conductors would substantially reduce wildfire risk and increase energy reliability, regulators should be wary of PG&E's reticence to deploy covered conductors simply because it does not fit within their 10,000-mile undergrounding strategy. We fear that this reticence could result in depriving customers and communities of the energy reliability they desperately need.

Undergrounding

RCRC appreciates PG&E actions to underground lines in towns devastated by wildfires. As homes and businesses are rebuilt, undergrounding infrastructure that can better withstand natural disasters and fires will help avoid future service disruption.

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[2] Filsinger Energy Partners, *PG&E Independent Safety Monitor Status Update Report*, April 3, 2023. https://www.cpuc.ca.gov/-/media/cpuc-website/industries-and-topics/documents/pge/oversight-and-enforcement/ism-status-update-report-q1-2023.pdf
[3] Ibid, page 18.
[4] Ibid, page 13.
[5] Page 340, PG&E 2023-2025 Wildfire Mitigation Plan.
[6] Page 252, SCE 2023-2025 Wildfire Mitigation Plan.

Residents who have been displaced, such as those in Butte and Plumas counties, should have greater confidence in resettling in their communities in light of PG&E's rebuilding efforts.

All the large utilities have discussed perceived cost reductions for wildfire safety undergrounding. This is a welcome change that may bring more undergrounding projects to underserved communities (i.e. less dense, urbanized areas) that have been unable to realize the undergrounding benefits of their urban colleagues under the Rule 20A program.

At the Large IOU workshop held April 27-28, 2023, it appeared that some of the cost efficiencies for utility undergrounding in High Fire Threat Districts (HFTDs) result from the reduction of conduit needed to accommodate community growth and density that is typically considered in the calculation for urban areas. While we appreciate the inherent differences in undergrounding in rural vs. urban areas, we are concerned that increased reliance on undergrounding could make it more difficult or expensive for rural communities to meet housing and economic development needs. There have been long-standing challenges and delays regarding PG&E distribution system interconnections that pre-date the shifting of resources/personnel to wildfire safety and mitigation work. As such, it is crucial that utility wildfire undergrounding projects built in rural, high-fire risk areas integrate and facilitate system expansion to easily serve new customers and increased demand from existing customers. Without adequate planning and flexibility, we fear that the challenges currently faced in connecting new customers to the grid will worsen and utilities may artificially constrain residential growth in large parts of the state, as well as overburden ratepayers with duplicative capital projects.

California remains in desperate need of new housing, and local governments are under strict mandates to develop and provide affordable housing units across the state and are committed to continuing smart development, such as ensuring community fire protection elements are built into any new developments. Local governments are regionally mandated under the Regional Housing Needs Allocation (RHNA) to develop specific numbers of housing units and are facing serious penalties from the Administration if these requirements aren't met. Utilities, therefore, must consult with local governments for undergrounding projects in HFTDs to ensure they will be able to accommodate state mandates imposed on local governments, including housing needs, and continue to facilitate economic development. Furthermore, given the state's decarbonization goals and subsequent electrification mandates for buildings and transportation, Energy Safety must ensure the suite of wildfire mitigation initiatives and system hardening employed by utilities does not impede a community's ability to meet these transformational mandates, including those Californians who reside in HFTDs. Relying on undergrounding may stagnate growth if utilities continue to silo their pre-planning efforts and decision-making and fail to engage their communities. Poor planning and execution may cost ratepayers more in the long-term.

Lastly, as illustrated by PG&E's Table 8.1.2-1, it is unclear why line removal miles do not closely correspond to miles undergrounded. Once a circuit line is undergrounded, do those depowered overhead lines remain in place as blight? Are remaining overhead lines, poles, and equipment exclusively telecommunication facilities? How often will lower-voltage secondary lines remain on poles where the primary conductor was undergrounded? We urge utilities to better communicate how things are expected to look after undergrounding work is completed, and how those efforts may change existing costs, timeframes, and procedures for new service connections and extensions.

Microgrids

Clean, renewable energy substation microgrids (e.g. hydrogen fuel cell) are a far better technology solution than PG&E's proposed vehicle-to-grid technology pilot driven by Commission Decision 20-12-029. At a minimum, PG&E should clarify how many vehicles would be needed to support a community microgrid, and how PG&E expects to procure and pre-position vehicles for such a microgrid (e.g. are private vehicle owners adequately compensated for the contributions they provide to the microgrid and utility?). It remains unclear how bidirectional charging will impact residents living in rural and remote areas who rely on their vehicles to evacuate during severe weather events and wildfires. Similarly, it is unknown how these residents and microgrids will fare during long-duration outages, as have occurred under both the EPSS/Fast Curve and PSPS outages. It is imperative that regulators avoid sacrificing Californians' mobility and ability to evacuate in order to power microgrids.

Vegetation Management

The performance of utility vegetation management (VM) programs continues to be of concern in many of our rural, forested communities. The Enhanced Vegetation Management (EVM) program articulated in PG&E's 2022 WMP was dramatically different than the program's execution with regard to wood hauling. RCRC seeks to ensure these missteps will not continue in future years. It is imperative that utilities include wood management and hauling – e.g. the removal of large tree limbs, trunks, or "slash" – within **ALL** of their vegetation management programs. In 2022, PG&E suspended wood removal from its EVM activities conducted on private property. This effectively shifted liability from PG&E onto individual customers, some of whom were cited by CAL FIRE for defensible space violations for haphazard tree work conducted by PG&E and its contractors. While PG&E committed to addressing these problems and the backlog of felled wood, **it is imperative that any new or modified vegetation management programs fully integrate wood removal going forward**. Failure to do so will simply shift wildfire risks and costs onto the backs of customers who are less able to bear those costs and more acutely impacted by the consequences.

By most indications (from utility WMPs generally and through the workshops), both tree trimming/felling and its associated clean-up are not considered separate programs;

however, that was not the experience for many PG&E customers. PG&E's 2023-2025 WMP, however, poses significant concern given it treats wood management as a distinct program associated with its post-fire and Enhanced Vegetation Management programs when it should be an integrated component of all vegetation management operations. Cutting down a tree that poses a wildfire risk to utility lines, only to leave it on the ground as fuel for a future fire, is counterproductive and should be a matter of statewide concern.

If done correctly, PG&E's decision to "sunset" its Enhanced Vegetation Management (EVM) program and transition into three successor programs may be an improvement (with several caveats, discussed below). For instance, one of the new programs is VM for Operational Mitigations, which is targeted to reduce the outages on EPSS-enabled circuits. RCRC supports prioritizing efforts on specific circuits that have experienced the most vegetation-caused outages and/or circuits where customers have experienced multiple outages. With the greater reliance on EPSS and the leading cause of EPSS outages being vegetation contact with power lines, the success of the VM program should also be measured by, or have a close nexus to, reduced number of EPSS-related power outages.

However, RCRC continues to have lingering holistic concerns with PG&E's VM activities. First, customer interaction between different VM programs needs to be consistent and streamlined. For instance, the interaction of these three programs needs to be consistent from a customer-facing perspective (e.g., similar forms and communication methods, uniform slash management protocols, etc.). Many customers who were familiar with PG&E's tree mortality VM program had wildly different (and often very negative) experiences with PG&E's EVM program (despite the work often being performed by the same subcontractors). This ranged from the bungled permission to access properties, to the quality and timeliness of tree work (including clean-up/hauling of slash and large-diameter wood) performed.

Second, PG&E's subcontractors need far greater oversight in the field (by internal employees) and must be trained more consistently. Customers—residential and public agencies—need to be able to promptly resolve concerns when they arise. Some of the permission forms or contact was done on a PG&E electronic tablet in person, with no leave-behind information on that agreement for customers to reference. Forms need to be more consistent across the three successor VM programs and, if done electronically, a receipt of some kind needs to be provided to the customers, with a copy of the agreement, and how to contact PG&E if needed. In the past, some counties have had to hire outside legal counsel to perform basic communication with PG&E on their VM activities (predominantly carried out by its subcontractors). PG&E's "Field Quality Control" Program[7] (coupled with its Regional Service Model) is a step in the right direction, but still needs to provide a link at the customer level for appropriate feedback and accountability.

[7] Page 554, PG&E 2023-2025 Wildfire Mitigation Plan.

Third, VM projects, from beginning to end, should be completed on each property in a better fashion—such as not impeding a customer's defensible space for long periods of time. PG&E's termination of wood haul in late 2022 was an abrupt, jarring experience that ravaged many properties. Tree work and wood management or slash removal should be done in logistical tandem to avoid disrupting property owners as a result of erratic PG&E decision-making and inadequate oversight.

PG&E's 2023-2025 WMP speaks to legacy EVM, but it must also ensure that clean-up efforts of the slash that was abruptly abandoned in 2022 be fully mitigated and accounted for. Additionally, if a utility VM program needs to wind down or evolve in the future, it must be done more artfully than the "cost savings" scheme PG&E employed in late 2022.

Moreover, PG&E should be required to address wood management generated from its (legacy) EVM program. **Energy Safety should reject PG&E's wood management program and should require large diameter slash be removed from properties within the successor VM programs**. Given the sheer volume of VM done on many properties by PG&E, there is very little appetite, let alone capability, for most customers to address large diameter (>4 inches) wood, branches, and limbs that litter their property. By allowing it to be treated as a separate program, PG&E will continue to be incentivized to discontinue it.

Finally, given the volume of trees and forested lands in PG&E's service territory, PG&E needs to consider using registered professional foresters—not just arborists—throughout its VM portfolio. This should range from tree identification and risk assessment work, to quality control inspections in many areas of its service territory. Presently, PG&E may be hiring the wrong type of professionals for the job if they cannot see the forest through the (individual) trees.

While PG&E reports it has made significant strides to improve its vegetation management programs over the last few months (and has resumed wood hauling of trees cut in 2022), much work remains, and it is imperative that Energy Safety ensure that any program improvements are durable and meaningful.

Public Safety Power Shut-offs (PSPS)

At the Large IOU workshop held April 27-28, 2023, both SCE and PGE indicated their fast-trip programs were weather dependent. Given their structural similarities, it raises the question of what the meaningful difference is between PSPS and outages related to fast-trip settings. In 2022, there was an inverse correlation of PG&E's customers experiencing a PSPS and EPSS outage.[8] We urge Energy Safety to parse out criteria to meaningfully distinguish between the programs. From a customer and county

[8] As illustrated by Table 8-24, there were 2,375 EPSS "Events," but zero PSPS Events in 2022.

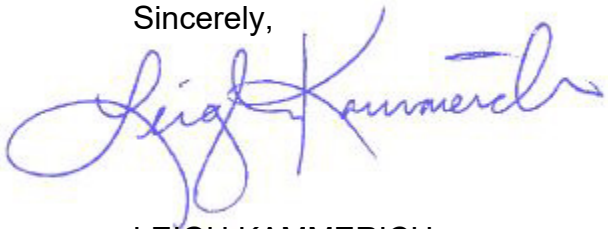
operations perspective, one program (PSPS) provides advance notice and support, while the other just leaves everyone in the dark. While we acknowledge that PG&E projects EPSS "events" to nominally decline between 2023-2025, it is unclear if utilities as a whole will exploit the flexibility of customer outages from sectionalizing devices to eventually replace PSPS in practice, which has a more explicit regulatory responsibility to be a last resort and to reduce over time through system investments and improvements.

Conclusion

Thank you for your consideration of our comments and the opportunity to convey rural community and customer experiences with the suite of utility wildfire mitigation practices. RCRC applauds the considerable amount of work and maturity of wildfire mitigation planning over the last few years. We look forward to greater safety practices and investments resulting in greater energy reliability overall, not the trade-off many rural counties are currently experiencing. Overall, the series of wildfire mitigations must be implemented in a manner that maximizes wildfire risk reductions and protection of public health, safety, and welfare, and substantially increases the energy reliability. Unfortunately, merely maintaining system reliability is no longer an adequate goal in many rural communities as a result of the dramatic decline in energy reliability over the last few years.

If you have any questions, please do not hesitate to contact me at (916) 447-4806 or lkammerich@rcrcnet.org.

Sincerely,



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