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Via E-Mail
RACHEL.PETERSON@CPUC.CA.GOV

Rachel Peterson
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Pacific Gas and Electric Company's Comments on Draft Resolution WSD-021 and Draft Action Statement

Dear Executive Director Peterson:

Pacific Gas and Electric Company (PG&E) respectfully submits these comments regarding Draft Resolution WSD-021 issued by the California Public Utilities Commission (Commission) on August 9, 2021 (Draft Resolution) and the Draft Action Statement (Action Statement) prepared by the Office of Energy Infrastructure Safety (OEIS). The Action Statement approves PG&E's 2021 Wildfire Mitigation Plan (WMP) and the Draft Resolution ratifies the Action Statement.

PG&E appreciates the Commission's and OEIS' thorough review of our 2021 WMP and the recognition that PG&E has "an improved understanding of the underlying risks it faces, a more targeted approach to addressing those risks, and a foundational change in its organization structure and systems, including data governance, that will better position it to improve over time."¹ At the same time, we are mindful of the areas of needed improvement identified by OEIS and the Commission and are and will be focused on making substantial progress in these areas for the remainder of 2021 and 2022.

¹ Action Statement, p. 3.

The letter included with the Draft Resolution indicated that comments should focus on “factual, legal or technical errors.” Thus, our comments are directed towards portions of the Draft Resolution and Action Statement that require correction or clarification to address errors.

1. Remedy PG&E-21-03

Remedy PG&E-21-03 addresses the use of automation in PG&E’s risk modeling. While we generally agree with the need for more automation in risk modeling, the description of Remedy PG&E-21-03 includes one statement that requires correction. The Issue Description for this remedy correctly notes that PG&E “overhauled its modeling efforts between the 2020 and 2021 WMP submissions”² and in the Action Statement text, OEIS comments that “PG&E continues to show growth and improvement in developing its Wildfire Risk Models, which inform its risk assessment and mapping.”³

Despite these findings, the Issue Description then incorrectly concludes that “PG&E fails to demonstrate growth at an adequate speed in regard to its own risk assessment.”⁴ Remedy PG&E-21-03 never defines what constitutes “adequate speed” nor does the Issue Description try to reconcile this statement with earlier remarks in the Action Statement that PG&E is showing growth and improvement and that we completely overhauled our models for 2021. The Action Statement also does not explain the growth in risk assessment scores for the other utilities and the type of growth by these utilities that demonstrates “adequate speed.” In addition, the Issue Description is not clear how adequate speed and growth can be determined by simply comparing scores from two maturity model submissions. Speed and growth in development cannot be solely determined by two data points, especially given the substantial changes in PG&E’s risk modeling described in the Action Statement.

To be clear, PG&E does not object to the specific remedies proposed in Remedy PG&E-21-03. However, we do propose that the Issue Description be revised to state⁵:

PG&E self-reported a low risk assessment score in the Maturity Model with slower growth in comparison to the other two large investor-owned utilities (IOUs). ~~While this~~ This seems to be largely due to lack of automation in many different areas, ~~and while PG&E overhauled its modeling efforts between the 2020 and 2021 WMP submissions,~~ PG&E fails to demonstrate growth at an adequate speed in regard to its risk assessment.

2. Remedy PG&E-21-07

This remedy requests additional information regarding our plans for Distribution Fault Anticipation (DFA) and Early Fault Detection (EFD) technologies. While we do not object to the remedy, it mistakenly states that this technology will be utilized across our service territory.⁶ However, in the 2021 WMP we explained that our plan is to develop a “strategy to deploy this

² Action Statement, p. 44.

³ Action Statement, p. 40.

⁴ Action Statement, p. 44.

⁵ Strikethrough represents proposed deletions and underlining proposed additions.

⁶ Action Statement, p. 50.

technology to 600+ HFTD circuits over the next 8-10 years covering multiple GRC planning cycles.”⁷ Thus, Remedy PG&E-21-07 should be corrected to state:

PG&E must: 1. Provide details and performance metrics on the outcome of the 2020 DFA and EFD technology pilot program. 2. Explain how the determination was made to increase deployments of DFA/EFD technology across HFTD areas ~~its service territory~~.

3. Remedy PG&E-21-18

Remedy PG&E-21-18 instructs PG&E to improve its maturity scores for its Vegetation Management (VM) Maturity Models, to “define goals and targets to reach each level of maturity,” and to develop “a timeline for completion” of this work, among other things. We agree with the overall goal of this Remedy and recognize that we can improve our models and will continue to do so. However, it would be beneficial if OEIS provided PG&E and the other electrical corporations with the methodology used by OEIS for calculating model maturity. In an effort to improve maturity, PG&E created its own internal formula for calculating maturity, but this formula provided different scores than those of OEIS. Therefore, this remedy could be much more expeditiously accomplished if PG&E knew how maturity scores are determined so that we can improve in an efficient manner. Furthermore, this remedy should include a pathway to align any discrepancies in PG&E’s and OEIS’ methodologies. To address this issue, PG&E proposes adding the following language to the Remedy PGE-21-18 Issue Description:

OEIS will provide to PG&E and the other electrical corporations additional information as to how OEIS calculates maturity scores so that the electrical corporations can make more informed decisions as to actions to take and goals to set to mature their VM programs.

4. Remedy PG&E-21-19

In our 2021 WMP, we explained how we collaboratively work with agencies, local and tribal governments, and landowners to facilitate our vegetation management program.⁸ We did note, however, that in certain limited circumstances, PG&E is required to seek a judicial remedy, explaining:

To address the requirements described above, PG&E’s land and environmental management, customer care, and legal teams work closely with PG&E’s VM team annually to overcome community and environmental challenges. They coordinate and plan the work in order to reach out to landowners, communities, and local governments to address concerns in advance of the proposed VM activities. PG&E tries to reach mutually agreeable results with concerned parties, but this regularly causes delays, that in certain situations prompt PG&E to seek court orders. PG&E routinely engages with the CPUC, state and local agencies, as well as legislature to address these constraints.⁹

⁷ Revised 2021 WMP, p. 493.

⁸ Revised 2021 WMP, pp. 690-691.

⁹ Revised 2021 WMP, p. 691.

The Issue Description for Remedy PG&E-21-19 does not clearly characterize this portion of the 2021 WMP and instead implies that we routinely seek court orders. The Issue Description and the Remedy also ignore the 2021 WMP description of efforts PG&E is already making to work collaboratively with agencies and landowners. In order to correctly characterize our 2021 WMP, The Issue Description should be revised to state:

PG&E cites delays in reaching mutually agreeable environmental and community impact mitigation efforts that may in certain limited circumstances result in PG&E seeking court orders.

And Remedy PG&E-21-19 should be revised to state:

PG&E must show continued effort and progress on achieving environmental and community impact mitigation agreements with agencies, local governments, and tribal governments.

5. Remedy PG&E-21-21

Remedy PG&E-21-21 addresses the use of fire retardants. The Issue Description states that “long-term, repeated applications of fire retardant in the same area will likely have negative environmental impacts.”¹⁰ This statement is incorrect because it assumes that PG&E’s current plan is long-term application of retardants. However, in the Revised 2021 WMP, we explained:

PG&E has not determined a long-term plan yet for this initiative. Depending on the results of PG&E’s fire-retardant review, PG&E will establish best management practices for future use of fire retardants. Additionally, PG&E will work with regulatory agencies to secure permits for future product use and application. Long-term plan milestones are still under development with VMs Leadership team.¹¹

In addition, the Action Statement provides no scientific support for the statement that application of fire retardant in the same area “will likely have negative environmental impacts.” The Issue Description cites a United States Forest Service (USFS) publication but then acknowledges that the publication “does not focus on long-term and repeated use in the same area.”¹²

PG&E does not object to Remedy PG&E-21-21, but proposes that the last sentence of the Issue Description be deleted because it incorrectly implies aspects of a long-term plan by PG&E and includes a scientific conclusion that is unsupported by any citation or evidence.

6. Remedy PG&E-21-22

Remedy PG&E-21-22 addresses how PG&E records in its Tree Assessment Tool (TAT) the types of trees inspected. PG&E agrees that it is important for its TAT to record specific tree species and genus as often as possible. However, since PG&E tree records include the Latin or scientific names of the individual records for cross-referencing, PG&E does not see value in compelling the use of Latin or scientific names as a replacement for common names as long as

¹⁰ Action Statement, p. 80.

¹¹ Revised 2021 WMP, p. 705.

¹² Action Statement, p. 80.

each species has a unique identifier that is applied consistently. For example, Quercus Agrifolia and Coast Live Oak are both unique identifiers and there is no benefit gained from converting from this common naming convention to Latin/scientific naming, which would only increase the likelihood of human error.

We agree with OEIS that the use of non-specific tree species, such as “pine” and “oak,” can cause confusion and that detailed and specific tree species names should be used whenever possible. In order to address this shared concern, we propose the following modification to Remedy PGE-21-22, item 1:

~~Use scientific names in its reporting (as opposed to common names).~~ Use a unique identifier for tree species and genus wherever possible. This change will be reflected in the upcoming updates to Energy Safety GIS Reporting Standard. In addition, PG&E will provide a table correlating each unique identifier to the scientific Latin name when it provides this information to OEIS or the Commission.

7. Remedy PG&E-21-24

Remedy PG&E-21-24 directs PG&E to “define quantitative targets for all VM initiatives” identified in Table 12 of the 2021 WMP. However, Table 12 is comprised of financial data, line miles treated, and Risk Spend Efficiency scores, and there are no quantitative targets for these items, including the VM initiatives. The Issue Description states that PG&E defined “quantitative targets for six of the 20 VM initiatives,” however, it is unclear how this number was generated. Even assuming that the phrase “quantitative targets” means the “line miles treated” for these initiatives, the number of line miles treated was provided for 13 of the initiatives, not six. PG&E recommends deleting the Issue Description given the ambiguity in the description of Table 12 and replacing it with the statement: “OEIS needs targets for each initiative so that it can evaluate the WMP, or an explanation of why targets are not applicable. PG&E needs to provide targets or an explanation for each VM initiative.”

Conclusion

PG&E appreciates this opportunity to comment on the Draft Resolution and Action Statement and respectfully requests that the Commission and OEIS make the changes indicated above in these documents.

Sincerely,



Meredith E. Allen
Senior Director, Regulatory Relations

cc: Service List in R.18-10-007 (via email)
wildfiresafety@cpuc.ca.gov
E-Filed in Docket #2021-WMPs