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VIA ELECTRONIC FILING AND EMAIL

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Subject: The Public Advocates Office's Comments on the Office of Energy Infrastructure Safety's Wildfire Risk Modeling Coordination Workshop Held on October 5 and 6, 2021, Docket #: Risk-Model-Group

Pursuant to the Notice of Public Workshop served on September 24, 2021, by the Office of Energy Infrastructure Safety ("Energy Safety"), the Public Advocates Office at the California Public Utilities Commission ("Cal Advocates") hereby submits these comments on the Wildfire Risk Modeling Coordination Workshop held on October 5 and 6, 2021 (referred to henceforth as "the Workshop").

BACKGROUND & INTRODUCTION

On September 24, 2021, Energy Safety issued a Notice of Public Workshop on its Wildfire Mitigation Plan ("WMP") service list. On September 29, 2021, Energy Safety issued a set of Workplan Guidelines on what Energy Safety expected to see presented at the Workshop.

The Workshop was remotely held on October 5 and 6, 2021 and included presentations by investor-owned utilities ("IOUs" or "utilities") Pacific Gas and Electric Company ("PG&E"), Southern California Edison Company ("SCE"), San Diego Gas & Electric Company ("SDG&E"), PacifiCorp, Liberty Utilities ("Liberty"), and Bear Valley Electric Service ("BVES").[1] The Workshop also included a Wildfire Risk Modeling Panel of Experts, and presentations related to the ongoing Wildfire Modeling Working Group, which were coordinated by Energy Safety.

[1] Agenda for Public Workshop Re: Wildfire Risk Modeling Coordination, October 4, 2021.

On October 13, 2021, the aforementioned utilities served reports[2] that provided detailed descriptions of their wildfire risk models. On October 27, 2021, the Wildfire Modeling Working Group remotely held its first meeting. Cal Advocates attended the Workshop as a panelist, and is participating in the ongoing Wildfire Modeling Working Group, which is expected to continue into 2022.[3]

DISCUSSION & RECOMMENDATIONS

Cal Advocates makes the following recommendations on the utilities' wildfire modeling practices:

- Energy Safety should require utilities to provide detailed descriptions of their updated risk models in their 2022 WMP Update filings.
- Energy Safety should develop a streamlined process to handle confidential information without limiting transparency.
- Energy Safety should require utilities to engage an independent consultant to evaluate their wildfire risk models.
- Energy Safety should consider engaging a third party to perform an independent evaluation of Technosylva.

COMMENTS

A. Energy Safety should require utilities to provide detailed descriptions of their updated risk models in their 2022 WMP Update filings.

During the Workshop, PG&E, SCE, and SDG&E each described significant changes and expansions they are planning to make to their respective risk models in 2022. These proposed changes include new models to capture additional risk drivers,[4,5] expanded training data sets,[6] and additional fuel and weather scenarios.[7] It is currently unclear how much detail the utilities will provide of these changes in their 2022 WMP Update filings.

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[2] Pursuant to Wildfire Risk Modeling Working Group Workplan Guidelines, September 29, 2021.

[3] Wildfire Risk Modeling Working Group Proposed Schedule Draft, October 29, 2021.

[4] PG&E's Wildfire Distribution Risk Model presentation (PG&E's presentation), October 5, 2021,
slide 4.

[5] SDG&E's OEIS Risk Modeling Workshop presentation (SDG&E's presentation), October 5, 2021,
slide 37.

[6] PG&E's Wildfire Distribution Risk Model presentation (PG&E's presentation), October 5, 2021, slide 4.

[7] SCE's Wildfire and PSPS Risk Models presentation (SCE's presentation), October 5, 2021, slide 16.

Energy Safety found all the IOUs' 2021 WMPs to be deficient with regard to risk modeling,[8] and required PG&E to submit substantial additional information regarding its 2021 Risk Model in its Revision Notice to the utility.[9] Without clear guidance from Energy Safety, stakeholders cannot be certain that the utilities' 2022 WMPs will contain sufficient information to assess the appropriateness of the changes they are making to their wildfire risk models. In order to facilitate transparency and a thorough review of risk model updates by stakeholders, Energy Safety should require utilities to provide detailed descriptions of their updated wildfire risk models in their 2022 WMP Update filings. Energy Safey should specify the requirements that must be included in such descriptions, similar to the guidance that it issued for the October 5 and 6, 2021 workshops.[10]

B. Energy Safety should develop a streamlined process to handle confidential information without limiting transparency.

Utility risk models are complex and incorporate numerous datasets. Specific algorithms or datasets may be considered confidential by the utility.[11] The Wildfire Modeling Working Group consists of a mix of utility representatives, Energy Safety Staff, California Public Utilities Commission ("CPUC") staff, Cal Advocates, and advocacy groups such as The Utility Reform Network ("TURN") and the Mussey Grade Road Alliance ("MGRA").

Energy Safety staff, and CPUC staff including Cal Advocates staff are statutorily granted access to confidential utility information.[12] Other stakeholders participating in the Wildfire Modeling Working Group may not have the same privileges. In order for stakeholders to evaluate risk models and make specific recommendations, all members of the Wildfire Modeling Working Group must be allowed equal access to data declared as confidential by the IOUs.

Energy Safety should develop a streamlined process to safely and transparently handle and transmit confidential information received from utilities that pertains to the activities of the Wildfire Modeling Working Group, directly to the members of the Wildfire Modeling Working Group. We recommend that Energy Safety require utilities to attach notices of confidentiality as appropriate and to allow all members of the Wildfire Modeling Working Group access to supporting data absent a showing of good cause why the information cannot be shared with a given member. Such requirements are consistent with Energy Safety's rules of practice and

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[8] Notice of Public Workshop Re: Wildfire Risk Modeling Coordination, September 24, 2021, p. 3.

[9] The Wildfire Safety Division Issuance of Revision Notice for Pacific Gas and Electric Company's 2021 Wildfire Mitigation Plan Update and Notice of Extension of WSD Determination Per Public Utilities Code 8389.3(a), May 4, 2021, pp. 7-10.

[10] Wildfire Risk Modeling Working Group Workplan Guidelines, September 29, 2021.

[11] See, for example, Comments of the Public Advocates Office on the 2021 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities – Appendix B, March 29, 2021, which referenced a confidential document related to PG&E's models.

[12] See, for example, Public Utilities Code §§ 309.5(a), 314, 581, 583; CPUC General Order 66-D (providing for submission of confidential information to CPUC staff, including Cal Advocates); Government (Gov.) Code § 15475(c) (providing for submission of confidential data to the office of Energy Safety and transfer of such information to the CPUC); *see generally* Gov. Code § 15475.

procedure, which provide for the designation and disclosure of confidential information.[13] Energy Safety should develop and implement these processes no later than December 8, 2021 to allow time for these rules to go into effect ahead of the 2022 WMP season.[14]

C. Energy Safety should require utilities to engage an independent consultant to evaluate their wildfire risk models.

Of the three large utilities, only PG&E[15] and SCE[16] stated during their presentations that they had engaged a third party to validate their risk models. The risk models are foundational to the WMP process; and appropriately and accurately estimating the risk of wildfire is critical to effectively prioritizing large-expenditure mitigations such as system hardening and vegetation management. Independent, external validation of these models will lend accountability and outside expertise to the process, helping ensure the utilities are using the most robust models to estimate wildfire risk.

Energy Safety should, in the forthcoming guidance for 2022 WMP Updates, include direction to the utilities to engage an independent third-party analyst to review and validate their wildfire risk models. A detailed independent evaluation of their wildfire risk models should occur at least once during each three-year WMP cycle.

D. Energy Safety should consider engaging a third party to perform an independent evaluation of Technosylva.

PG&E,[17] SCE,[18] and SDG&E[19] all utilize Technosylva, a software tool used to model wildfire behavior, to estimate wildfire consequence in their wildfire risk models. However, at the Workshop, there was limited discussion on the differences, if any, in how utilities set up their simulations, including the length of time the simulations run for, the environmental conditions used in the simulations, and how the results are utilized. Therefore, it is unclear whether the Technosylva tool is the most appropriate tool to employ in the wildfire risk models, or whether changes could be made to the simulations to better predict wildfire consequences For example, in prior comments, stakeholders have pointed out that Technosylva simulations are typically limited to eight hours, which may underpredict the risk of ignitions in remote areas that may not result in significant injury or property damage during the first eight hours.[20]

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[13] California Code of Regulations, Title 14, Division 17, Chapter 1, Article 1, § 29200-§ 29201.

[14] Per the Wildfire Risk Modeling Working Group Proposed Schedule Draft, October 29, 2021, this is the planned date for the third meeting of the Working Group.

[15] PG&E's presentation, slide 17.

[16] SCE's presentation, slide 15.

[17] PG&E's presentation, slide 12.

[18] SCE's presentation, slide 5.

[19] SDG&E Wildfire Risk Modeling Workplan, October 13, 2021, p. 13.

[20] See, example, Mussey Grade Road Alliance Comments on 2021 Wildfire Mitigation Plans of PG&E, SCE, and SDG&E, March 29, 2021, p. 12.

In order to ensure that utilities are using the appropriate tools to estimate wildfire consequence, Energy Safety should consider engaging a third party with expertise in wildfire consequences to perform an independent evaluation of Technosylva. This evaluation should attempt to answer the questions of whether Technosylva is the most appropriate tool to estimate wildfire consequence, and whether the ways it is employed by the utilities is the most effective in the context of the utility wildfire risk models.

CONCLUSION

Cal Advocates Office respectfully requests that Energy Safety adopt the recommendations contained herein.

Sincerely,

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