

December 2, 2021

BY ENERGY SAFETY E-FILING

Melissa Semcer
Program Manager, Electric Safety Policy Division
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: **Pacific Gas and Electric Company's Comments on the Office of Energy Infrastructure Safety's Draft 2022 Wildfire Mitigation Plan Update Guidelines 2022-WMPs**

Dear Ms. Semcer:

Pursuant to the instructions in the Office of Energy Infrastructure Safety's ("Energy Safety") November 9, 2021 letter, Pacific Gas and Electric Company ("PG&E") submits the following comments on the Draft 2022 Wildfire Mitigation Plan ("WMP") Update Guidelines (the "Draft Guidelines").

ITEMS IMPACTING FEASIBILITY TO MEET ENERGY SAFETY'S DEADLINES

A. **Requiring 2023 Forecasted Data Will Be Burdensome and of Limited Benefit**

As it did last year, PG&E respectfully requests that the requirements seeking 2023 data be removed from the Draft Guidelines. Instances where the Draft Guidelines have been revised to request 2023 data include: (1) for all quantifiable program targets;¹ (2) projected cost increases to rate payers;² and (3) projected drivers of ignition.³ Each WMP is designed to cover a three-year period, with annual updates, and the current WMP cycle is for the years 2020 through 2022. Therefore, given that PG&E's forecasts for this WMP cycle were specifically designed to cover only the period up to 2022, it would be burdensome to create forecasts for 2023. Furthermore, program targets change rapidly such that forecasted targets for 2023 would likely be significantly revised and therefore be of little informational benefit.

B. **Additional Time Should Be Allowed for Non-Substantive Revisions Such as Adding Hyperlinks and Page Numbers**

Section 2 of the WMP template has been revised to require hyperlinks to the sections and page numbers demonstrating statutory compliance with Public Utilities Code ("P.U.C.") Section 8386(c).⁴ Given the extremely tight timelines faced by the utilities in completing the WMPs by

¹ Draft Guidelines, Attachment 2 (Redline) at pp. 56, 58-59.

² Draft Guidelines, Attachment 2 (Redline) at p. 42.

³ Draft Guidelines, Attachment 2 (Redline) at p. 69.

⁴ Draft Guidelines, Attachment 2 (Redline) at p. 33.

the deadline, and the massive size of the WMP documents, PG&E believes this requirement could very possibly impact its ability to timely meet the submission deadline. This is particularly true given that these hyperlinks and page numbers cannot be finalized until every other item in the WMPs has been finalized. Therefore, PG&E recommends allowing the documents to be submitted on the February 4, 2022 deadline without hyperlinks and page numbers, and to have a separate deadline, five business days later, by which the utilities could submit a document containing the requested hyperlinks.

PG&E recommends that the Draft Guidelines be revised as follows:

Section 2 comprises a “check list” of the Pub. Util. Code § 8386 (c) requirements and subparts. The utility is required to both affirm that the WMP addresses each requirement AND cite the section and page number where statutory compliance is demonstrated fully. Citations are required to use cross-referencing with hyperlinks. However, if necessary, WMPs without hyperlinks and page numbers may be submitted on the specified submission deadline, as long as WMPs with functioning hyperlinks and page numbers are subsequently submitted within five business days of that date. Note: Energy Safety reserves the right to automatically reject a WMP that does not provide substantiation for statutory compliance or does not provide citations to appropriate sections of the WMP.⁵

ITEMS FOR CLARIFICATION

A. Clarification as to the Revised Section 7.1.G Requirements Would Be Helpful

The Draft Guidelines add an additional requirement to Section 7.1 to:

Provide geospatial maps for Grid Design and System Hardening mitigations. The map must show the transmission and distribution grid with each line distinguished by its state of hardening and type of hardening where known (e.g., undergrounding or covered conductors), such as:

- a. Currently not hardened and no plan to harden within next 10 years
- b. Currently hardened line
- c. Hardening planned by June 1 of current year
- d. Hardening planned by Sep 1 of current year
- e. Hardening planned by next Annual WMP Update
- f. Hardening planned within the next 3 years
- g. Hardening planned within the next 10 years⁶

This requirement is ambiguous and could benefit from clarification. The Draft Guidelines refer to “Grid Design and System Hardening mitigations.” However, based on references in Section 7.1.G to “each line” and “hardening”, PG&E believes that the intent of Section 7.1.G was the submission of maps depicting overhead transmission and distribution lines, underground

⁵ Draft Guidelines, Attachment 2 (Clean) at p. 32.

⁶ Draft Guidelines, Attachment 2 (Redline) at p. 76.

transmission and distribution lines, remote grid, and facility removals. If this is correct, it would be helpful if Energy Safety modified the first sentence to state:

“Provide geospatial maps for overhead distribution and transmission lines, underground transmission and distribution lines, remote grid, and facility removals.”

In addition, from a feasibility standpoint, PG&E can provide the geospatial map information for 2022 and 2023. However, for requirements (f) (hardening planned within the next 3 years) and (g) (hardening planned within the next 10 years), this is not feasible at the circuit segment level because workplans are not developed at such a granular level that far in advance. PG&E recommends that specifically for requirements (f) and (g), PG&E provides the information at the circuit level.

B. The Phrase “Enterprise System” Should be Defined in Initiative 7.3.5.19

Initiative 7.3.5.19, the initiative for establishing a vegetation inventory system, was revised to require the creation of a “vegetation management enterprise system.”⁷ However, the term “enterprise system” is not defined in the guidance documents and would benefit from a formal definition. In particular, Energy Safety should adopt a definition for “enterprise system” that does not require this information to be shared across every department in the entire company. While sharing information across certain lines of business is important, it is not necessary for this specific vegetation management information to be shared with lines of business for whom it would not be useful or necessary.

We propose the following definition for enterprise system: “a centralized information system that ensures data may be shared throughout all functional levels and management hierarchies of an organization, as needed.”

C. A Formal Definition Should Be Provided for Initiative 7.3.1.6

Similar to last year, Initiative 7.3.1.6, “weather-driven risk map and modelling based on various relevant weather scenarios,” lacks a formal definition.⁸ This initiative would benefit from a formal definition and guidance from Energy Safety.

D. Initiative 7.3.6.8 Should Also Be Formally Defined

The new initiative concerning “[p]rotective equipment and device settings,” Initiative 7.3.6.8, should also be formally defined.⁹ PG&E interprets this initiative as referring to its Enhanced Powerline Safety Setting (“EPSS”) program, but would appreciate guidance from Energy Safety on this issue to prevent any misunderstandings.

⁷ Draft Guidelines, Attachment 2 (Redline) at p. 99.

⁸ Draft Guidelines, Attachment 2 (Redline) at p. 78.

⁹ Draft Guidelines, Attachment 2 (Redline) at p. 80.

E. There is Also Ambiguity in the Regulatory Requirement for Initiative 7.3.5.20

Like the previous two initiatives, the revised guidelines for Initiative 7.3.5.20, which concern additional vegetation management practices beyond regulatory requirements and recommendations, would also benefit from clarification by Energy Safety. Specifically, there is disagreement among arborists and subject matter experts as to what constitutes “additional vegetation management actions” that are “taken beyond the minimum regulatory requirements and recommendations.”¹⁰ Given this difference of opinion, information provided to Energy Safety as part of this initiative may not be consistent and uniform, and a formal definition of what should be considered additional vegetation management practices beyond regulatory requirements would help to resolve this issue.

F. Clarification to the Requirements Surrounding Geospatial and Visual Maps is Needed

Several of the geospatial/visual map requirements added to the Draft Guidelines would benefit from additional definition. In particular, the time periods for the Red Flag Warning and High Wind Warning maps should be specified and PG&E suggests a limited span of years be identified.¹¹

CONCLUSION

PG&E appreciates Energy Safety’s efforts to refine the WMP. PG&E respectfully submits these comments and looks forward to continuing to work with Energy Safety to promote wildfire safety.

If you have any questions, please do not hesitate to contact the undersigned at R5L2@pge.com.

Very truly yours,

/s/ Jay Leyno

Jay Leyno

¹⁰ Draft Guidelines, Attachment 2 (Redline) at p. 99.

¹¹ Draft Guidelines, Attachment 2 (Redline) at p. 50.