



February 15, 2022

Via Electronic Filing

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Subject: Comments of the Public Advocates Office on Pacific Gas and Electric Company's Quarter Four (Q4) Quarterly Data Report, Docket #2021-SCs (PUBLIC VERSION)

Director Thomas Jacobs,

The Public Advocate's Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments on the 2021 Quarter 4 Quarterly Data Report (Q.4 Report) submitted February 1, 2022 by Pacific Gas and Electric Company (PG&E).

Cal Advocates submits these comments in accordance with the instructions provided in the Office of Energy Infrastructure Safety's (Energy Safety)¹ letter published on December 17, 2021.² We respectfully urge Energy Safety to consider our comments and adopt the recommendations discussed herein.

I. INTRODUCTION

Cal Advocates compared the Geographical Information System (GIS) Data that PG&E had reported to Energy Safety as part of the Quarterly Data Reports (QDRs) with the construction and as-built plans for undergrounding projects originating at the Rincon Substation (undergrounding projects), which PG&E provided in a data request response.³ PG&E fails to

¹ On July 1, 2021, the Wildfire Safety Division of the California Public Utilities Commission moved to the California Natural Resources Agency and became the Office of Energy Infrastructure Safety pursuant to Assembly Bill 111, which was signed by the Governor on July 12, 2019 (Chapter 81, Statutes of 2019).

² *Cover Letter from Stephen P. Lai, Draft GIS Data Reporting Standard Version 2.2.*, Office of Energy Infrastructure Safety, December 17, 2021.

³ Cal Advocates-PGE-Sonoma County Undergrounding Data Request 1. December 8, 2021.

report the full geographic extent of its planned undergrounding projects in the quarter one to quarter three data reports. The lag between the completed plan for the undergrounding projects and an accurate representation of the project in the 2021 Q.4 Report is at least 12 months. PG&E's lag in incorporating information into its GIS has negative implications for the accuracy of the quarterly data reports and operational decisions at PG&E that rely on this GIS data.

II. RECOMMENDATIONS

A. PG&E is Failing to Report System Hardening Project Location and Status in an Accurate and Timely Manner.

On June 24, 2021, an article was published in PG&E's online newsletter *Currents* that outlined PG&E's efforts to underground four circuits (Rincon 1101-1104) in Sonoma County to limit impacts of Public Safety Power Shutoffs (PSPS).⁴ In the article, PG&E stated that construction began in April 2020 and the facility would reduce impacts of PSPS events on 11,000 customers.⁵

Cal Advocates reviewed the information reported to Energy Safety as part of each quarterly data report and found that the footprints of the projects reported could not support PG&E's claim of reducing impacts on 11,000 customers as indicated in the newsletter. As shown in Figure 1, the size and extent of the projects reported in quarters one through three are substantially smaller than the projects reported in the Q.4 Report.

Cal Advocates reviewed construction and as-built documents for the Rincon undergrounding projects (identified internally by PG&E as PM #35145524 and #35145525).^{6,7} When plans and as-built documents were compared with the 2021 QDRs⁸ Cal Advocates identified two issues:

- 1) The geographical extent of the project reported did not align with the project as planned or completed (See Figure 1).
- 2) The status of the project i.e., whether it was in planning, in progress, or completed varied between quarters in non-logical ways (See Table 1).

⁴ <https://www.pgecurrents.com/2021/06/24/undergrounding-lines-in-santa-rosa-reduces-impact-of-safety-shutoff-events-for-pge-customers/> Accessed: February 11, 2022.

⁵ <https://www.pgecurrents.com/2021/06/24/undergrounding-lines-in-santa-rosa-reduces-impact-of-safety-shutoff-events-for-pge-customers/> Accessed: February 11, 2022.

⁶PG&E Response to Cal Advocates-PGE-Sonoma County Undergrounding Data Request 1. Attachment: Q2_Atch02_RINCON_35145524_CONSDWG_CONF. January 5, 2021.

⁷ PG&E Response to Cal Advocates-PGE-Sonoma County Undergrounding Data Request 1. Attachment: Q2_Atch04_35145525_AsBuiltDWG_Civil2_CONF. January 5, 2021.

⁸ See, Office of Energy Infrastructure Safety PG&E Q1 2021 Quarterly Data Reports submitted on May 3, 2021 (Q.1), August 2, 2021 (Q.2), November 1, 2021 (Q.3), and February 1, 2022 (Q.4).

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Construction began in April 2021,² the initial design and planning would have happened well before this point. As can be seen from Figure 1, the QDRs do not show the full extent of the projects as construction developed over the course of 2021. Consequently, the full extent of the project was not reported to Energy Safety until February 1, 2022, which is nearly a year after construction began. PG&E has stated that GIS is the system of record for PG&E's electrical distribution assets.¹⁰ It is evident from this analysis that there is substantial lag in reporting project plans and completed projects to PG&E's GIS system.

This is of concern for two reasons:

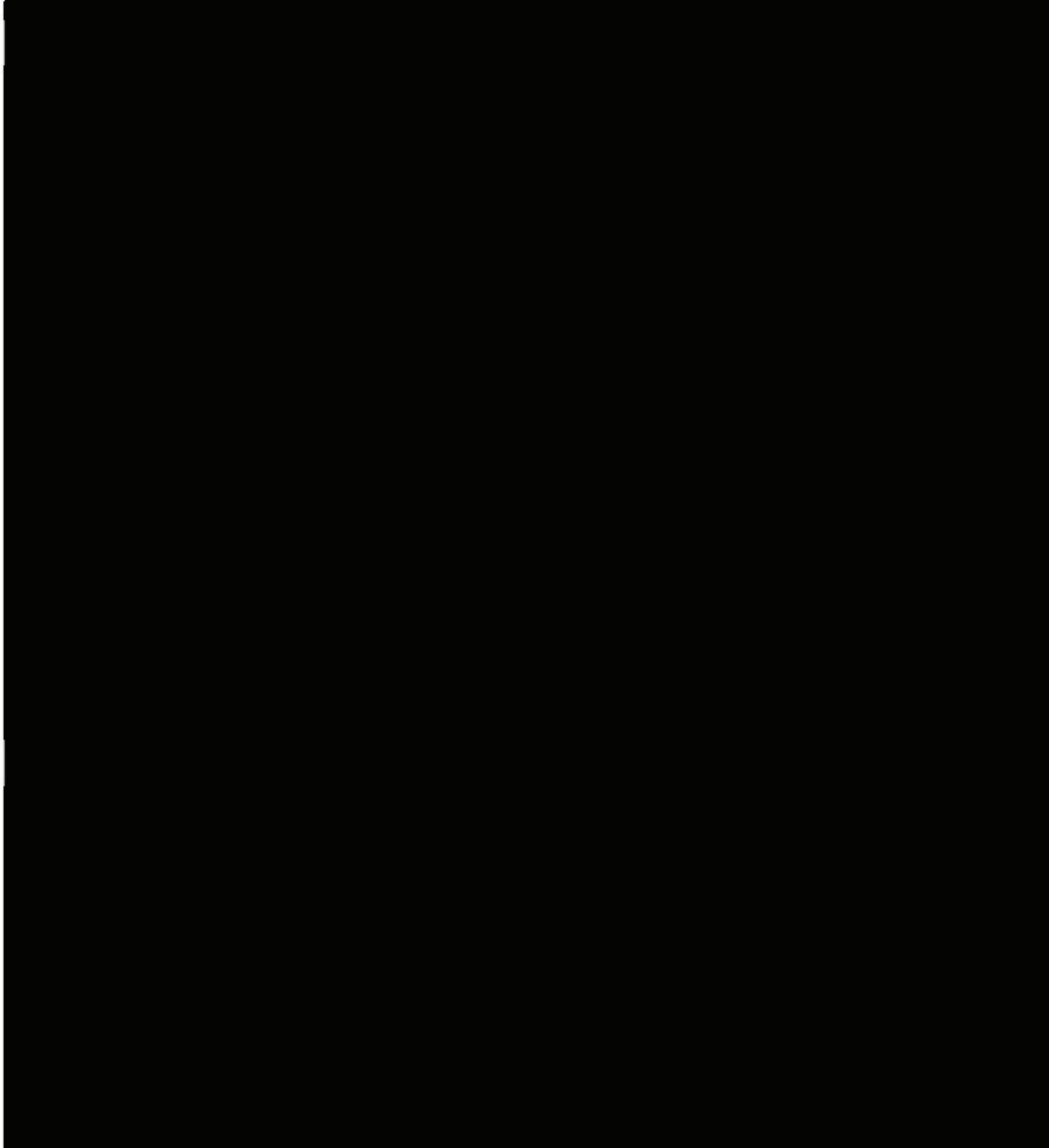
- 1) PG&E has not made clear whether critical decisions in relation to wildfires or PSPS rely on the accuracy of its GIS systems. If it does, then any lag in updating the GIS system could be critically important to PG&E's ability to make effective decisions.
- 2) Energy Safety's determination of PG&E's compliance with its Wildfire Mitigation Plan depends on the timely and accurate submission of information by PG&E.

² <https://www.pgecurrents.com/2021/06/24/undergrounding-lines-in-santa-rosa-reduces-impact-of-safety-shutoff-events-for-pge-customers/> Accessed: February 11, 2022.

¹⁰ R. 18-10-007 PG&E's Response to Administrative Law Judge's Second Ruling Seeking Additional Information on Wildfire Mitigation Plans. March 8, 2019. p.3.

Figure 1: Location and construction status of Rincon Undergrounding Projects Reported to Energy Safety in Q1 to Q4 2021 Data Reports.

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A second issue is evident in Project #35145524, the status of which changes between quarters in a non-logical way. Projects, as a whole, follow a logical sequence from “planned” to “in progress” to “complete”; however, PG&E’s information does not reflect this sequencing (Table 1). For example, Project #35145524 switched from “in progress” back to “planned” between quarters. Again, accurate and detailed information is needed to ensure that Energy Safety can

evaluate PG&E's compliance. If indeed this project did change from being in process, back to planned, then PG&E should explain in detail how this could happen.

Timely and accurate information regarding PG&E's undergrounding plans is more essential than ever given their stated intention to underground 3,600 circuit miles by 2026.¹¹ We ask that Energy Safety undertake a detailed review of PG&E's ability to track and maintain accurate and timely GIS records so that PG&E is able to report the progress and status of projects as required by Energy Safety's GIS data standards.¹²

III. CONCLUSION

Cal Advocates respectfully request that Energy Safety address the recommendations discussed herein. For any questions relating to these comments, please contact Iain Fisher (Arthur.Fisher@cpuc.ca.gov).

Sincerely,

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¹¹ *Q4'21 Earnings Presentation*, <https://investor.pgecorp.com/news-events/events-and-presentations/event-details/2022/PGE-Corporation-Fourth-Quarter-2021-Earnings-Release/default.aspx>
Assessed: February 11, 2022.

¹² *Draft GIS Data Reporting Standard Version 2.2.*, Office of Energy Infrastructure Safety, December 17, 2021, p. 4.