



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

April 14, 2022

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

E-Filed via 2022-WMPs Docket

RE: Reply Comments of the Rural County Representatives of California on the Large IOU 2022 Wildfire Mitigation Plan Updates

Dear Director Thomas Jacobs:

On behalf of the Rural County Representatives of California (RCRC), we provide these reply comments on the large investor-owned utility (IOU) 2022 updates of their respective Wildfire Mitigation Plans (WMPs or Plans). RCRC is an association of thirty-nine rural California counties, and our Board of Directors is comprised of elected supervisors from each member county.

While we do not dispute the benefits undergrounding can provide, TURN's comments questioning the cost-effectiveness of Pacific Gas & Electric's (PG&E's) proposed 10,000-mile initiative have merit. We agree that it is imperative for Energy Safety to provide direction to PG&E as soon as possible to set an acceptable scope of future undergrounding,¹ especially given its new emphasis as a primary mitigation tool, which will undoubtedly slow system hardening upgrades on its highest risk circuits and will leave customers in high fire threat communities to suffer wide ranging power outages for years to come. As noted by the Public Advocates Office (CalAdvocates), the pace and scale of PG&E's undergrounding plans would be unprecedented, and to date PG&E has not provided any evidence that would demonstrate they are capable of meeting their aggressive targets.² Should PG&E fail to meet its undergrounding performance criteria, Energy Safety must take swift action to pursue a corrective action plan.³

¹ *Opening Comments of the Utility Reform Network on the 2022 Wildfire Mitigation Plans* [TURN], page 5.

² *Comments of the Public Advocate's Office on the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities* [CalAdvocates], pages 11-13.

³ *Ibid*, page 21.

CalAdvocate's suggestions to co-trench undergrounding projects is also very timely with the recent broadband infrastructure investments.⁴ One of the reasons it is important for IOUs to collaborate with local agencies early on (prior to applying for necessary permits) is to appropriately time encroachments located along public rights-of-way with other road projects. Local governments need to ensure multiple projects wouldn't compound access issues to ingress and egress routes through a community, and that limited taxpayer resources to improve road conditions wouldn't be diminished. Better collaboration of IOUs with local governments would ensure multiple benefits for undergrounding efforts and reduce overall costs.

Additionally, we concur with the following stakeholder comments and urge their favorable consideration:

- Energy Safety should consider harmonizing covered conductor installation techniques, and other system hardening measures such as undergrounding, to improve best practices across utilities.⁵
- Energy Safety should require co-trenching of various utilities and should stipulate electrical IOUs to develop such plans.⁶
- Energy Safety should develop consistent practices for fast recloser settings, and require large IOUs to report these outages quarterly.⁷ Additionally, such reports should include the same level of detail as PSPS reports, such as impacted customers, total outage time, etc.⁸
- Much of PG&E's program category data needs to be disaggregated, such as differentiating between projects to rebuild communities and new system hardening work.⁹
- Energy Safety should require more information of PG&E regarding its reduced vegetation management budget that could prevent them from effectively mitigating hazardous trees—a known wildfire risk.¹⁰
- Utilities must take immediate steps to fix their respective overdue maintenance backlogs.¹¹

⁴ Senate Bill 156 (Chapter 112, Statutes of 2021) established a landmark \$6 billion in broadband infrastructure, a monumental step in reducing the digital divide, providing \$3.25 billion to construct a statewide open-access middle mile network, and a \$1 billion rural set aside for last-mile network construction.

⁵ *Comments of the Public Advocate's Office on General Issues in the 2022 Wildfire Mitigation Plan Updates of the Large Investor-Owned Utilities* [CalAdvocate's General Issues], page 6.

⁶ CalAdvocate's General Issues, page 7.

⁷ CalAdvocate's General Issues, page 13 and 15.

⁸ *MUSSEY GRADE ROAD ALLIANCE COMMENTS ON 2022 WILDFIRE MITIGATION PLANS OF PG&E, SCE, AND SDG&E* [Mussey Grade], page 91.

⁹ CalAdvocates, page 8.

¹⁰ CalAdvocates, pages 30-31.

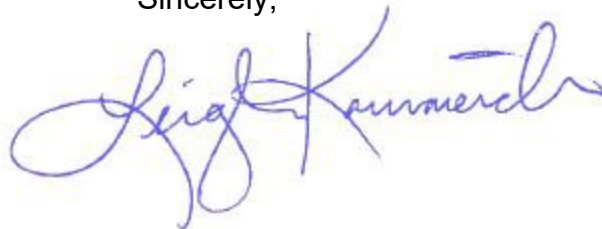
¹¹ CalAdvocates.

- Energy Safety should accelerate development of a public portal for GIS data, reducing data request burdens on utilities and benefiting public stakeholders alike.¹²
- Energy Safety should investigate whether incentives for capital projects, particularly undergrounding, are part of utility executive compensation packages.¹³

Lastly, we share many of the sentiments expressed by Will Abrams, and support his suggestion that utilities address and remedy the known causes of past catastrophic wildfires in their WMP.¹⁴ Relatedly, we agree with incorporating recommendations from external entities' oversight mechanisms, where applicable, into WMPs.¹⁵ This should be achievable given Energy Safety's Memorandums of Understanding (MOUs) in place with both the California Public Utilities Commission and CAL FIRE.

Again, we appreciate the efforts of Energy Safety and look forward to the articulation of utility wildfire mitigation planning continuously improving, as well as ensuring that these plans are actionable. If you have any questions, please do not hesitate to contact me at (916) 447-4806 or lkammerich@rcrcnet.org.

Sincerely,



LEIGH KAMMERICH
Policy Advocate

¹² Mussey Grade, page 64.

¹³ Mussey Grade, page 77. From page 75: "The PG&E undergrounding project has the earmarks of a top-down executive decision based on corporate priorities rather than safety concerns. It sets dubious goals without technical foundation, ignores standard practices for optimization of ratepayer safety and value, and, if implemented as planned, will provide a tremendous windfall to shareholders."

¹⁴ *William B. Abrams Comments on the Utility Proposed Wildfire Mitigation Plan Updates.*

¹⁵ California State Audit, *Electrical System Safety*, March 2022.