

Valley Women's Club of the San Lorenzo Valley
P.O. Box 574
Ben Lomond, CA 95005

Melissa Spencer, Deputy Director
Electrical Infrastructure Directorate
California Office of Infrastructure Safety

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Docket #2023-WMPs (2022 Wildfire Mitigation Plan Updates)

Thank you for the opportunity to provide feedback and comments on the OEIS WMP Guidelines process. We see some hopeful signs in the Guidelines that the OEIS is beginning to heed concerns that we have brought up repeatedly since the inception of the Wildfire Safety Division (now OEIS) – many of which were strongly emphasized in the State Auditor's report on Electrical System Safety (March 24, 2022, #2021-117). We have regularly and consistently defined the environmental destruction inherent in PG&E's ill-considered Wildfire Mitigation Plans (WMPs) as untenable, due to its over-reliance on Enhanced Vegetation Management (EVM) rather than comprehensive infrastructure modernization.

We strongly urge that the Guidelines process not be overly defined by the utilities themselves, that language in WMPs be prescriptive and not aspirational, and that there be tangible benchmarks for measuring compliance and progress in meeting these guidelines, overseen by the OEIS.

For decades, PG&E has demonstrated a lack of long-term planning in their approach to energy safety, more recently to wildfire mitigation, as shown by their continued reliance on protocols such as Public Safety Power Shutoffs (PSPS) and, as of last fall, unpredictable Enhanced Powerline Safety Settings (EPSS) events. **Both should be considered emergency measures only and not 'interim', as addressed in Segment 3 of the April 22, 2022 OEIS workshop. Considering them as 'interim' without a hard stop time limit allows utilities to keep pushing the 'interim' period forward into the indefinite future. In actuality, PG&E's current focus on undergrounding will assure that.**

Time limits on how long a utility is permitted to use emergency shutoffs as a regular feature of their WMP should be measured not just going forward, but also with its history of use taken into account. In other words, the clock should **not** start at zero. **PG&E, for instance, first proposed turning off power proactively during high wind periods in 2017 and has used PSPS regularly since 2019, and this should be taken note of, as it indicates a willingness to continue the use of PSPS and EPSS as permanent tools, inflicting high levels of uncertainty, inconvenience, economic damage and sometimes danger on ratepayers.**

We would expect to see objective standards for monitoring and verifying frequency and duration of PSPS and EPSS outages, with an upper threshold beyond which further oversight by the OEIS is triggered. It is our contention that tracking the use of emergency power shutoffs is a valuable measure of the strength of a utility's long-term wildfire mitigation strategies. Use of emergency or interim shutoffs past an appropriate implementation period of **5 years total** at most (as in 2019-2023), indicates serious weaknesses in the overall WMP. These tools are primarily used in rural areas, and as PG&E has shown with its more focused, smaller-area EPSS outages, it is primarily rural customers who bear the brunt of these methods.

They are not merely a temporary inconvenience, nor are they incidental to the WMP. They are an important metric by which to measure the robustness of a utility's overall infrastructure and its wildfire mitigation strategies.

We appreciate the emphasis on Risk Assessment, and feel that the Guidelines should provide **specific criteria for risk assessment** that would necessitate a comprehensive plan to mitigate all wildfire ignition factors through modernized infrastructure safety, as opposed to a piecemeal approach. In the October 5, 2021 OEIS Risk Modeling Coordination Workshop, PG&E clearly divided its modernization methodology into separate items such as where to replace expulsion fuses, power poles or transformers, in a compartmentalized approach. In stark contrast, both SDG&E and SCE, through risk assessment, had already discovered the impact of their aging infrastructure in high fire threat areas. (SCE had done so early in 2017, putting it on the path of Covered Conductor - and soon of complete replacement of aged infrastructure.)

By the time of the Workshop, each had confirmed and increased total replacement of antiquated, unsafe infrastructure, with the goal of fully modernizing their systems – examples of model parsimony that PG&E could not achieve. This has enabled SCE to remove EVM from its Wildfire Mitigation Plan and to no longer include improved areas in PSPS. PG&E's approach (having chosen EVM as its primary focus in 2017) leaves an electric system scattered throughout its territory with bare wires restrung on new poles, or new fuses placed on aging crossarms. Prescribing substantiation of **methods and results** as a part of modeling has the potential to reinforce compliance. WMPs should be part of an overall framework of responsive, accountable interactions between OEIS and the IOUs. Clear expectations for reporting are vital to determining the success rate of WMPs.

Under CEQA, wildfire is not the only environmental disaster that California Utilities should be held accountable for. If utility actions to reduce wildfire detrimentally impact the environment, this must be stringently assessed. Due to the lack of environmental review of Enhanced Vegetation Management, its destructive impacts are increasing exponentially. We urge the OEIS to require, through the Guidelines, CEQA environmental review. This will not only reveal untenable damage but will require examination of the alternatives to EVM.

Unless the Guidelines provide for environmental review of the WMPs, PG&E's massive tree removals will continue to be environmentally destructive, exacerbating climate change through significant forest ecosystem loss, habitat destruction and subsequent effects on moisture levels

and weather patterns – all already observed in Western landscapes. **Environmental impacts should be a high priority in assessing any WMP.** This can no longer be ignored since PG&E's EVM model has not been successful in preventing wildfires, culminating in the Dixie Fire where bare distribution lines were the primary factor leading to ignition.

Respectfully submitted,

Nancy Macy, Chair, Environmental Committee

Kristen Sandel, Vice Chair, Environmental Committee