Pacific Gas and Electric Company

Jay Leyno
Director
Community Wildfire Safety Program

Mailing Address: P.O. Box 7442
San Francisco, CA 94120
Telephone: (925) 239-3126
Email: Jay.Leyno@pge.com

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Via Office of Energy Infrastructure Safety E-Filing

Melissa Semcer, Deputy Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814
melissa.semcer@energysafety.ca.gov

Re: PG&E Response to Final Independent Evaluator Report Concerning 2021 Wildfire Mitigation Plan Compliance (Docket No. 2022-IE)

Dear Deputy Director Semcer:

Pacific Gas and Electric Company (PG&E) respectfully submits this response to the *Final Independent Evaluator Annual Report on Compliance* for PG&E's 2021 Wildfire Mitigation Plan (IE Report) from Bureau Veritas North America, Inc. (BVNA or IE).

1. Executive Summary

We appreciate the significant effort that BVNA put into preparing this report and assessing the work performed as part of our 2021 Wildfire Mitigation Plan (WMP). In performing its audit, BVNA reviewed publicly available documents, propounded over 140 data requests, conducted 10 interviews with PG&E employees, and completed hundreds of field assessments. BVNA made numerous findings in the IE Report, and we view each of these findings as a chance to continue to improve our wildfire mitigation efforts.

Given the enhanced scope of the IE's review as compared to last year, the findings in the IE report demonstrate our continued progress in the performance of our wildfire mitigation work. We are proud of BVNA's statement that we have "urgently explored ways to address and limit wildfire risk" by developing "working relationships with regulatory, communities, other utilities, and industry experts to understand the wildfire problem better." [1] We have worked hard to instill this sense of urgency in all our wildfire mitigation efforts and to bring to fruition our stand that

[1] IE Report, p. 6.

catastrophic wildfires shall stop.[2] Similarly, we appreciate BVNA's observation that the refinement of our "Distribution Risk Model and associated other modeling has aided in refinements of PG&E's strategies."[3] Risk modeling is an important area for us as we continue to focus on risk-based solutions to wildfire mitigation. Additionally, we continue to refine and improve our vegetation management programs and are pleased with BVNA's observation that "PG&E has a robust Vegetation Management (VM) Program that includes field identification, prescription implementation, 100-percent work verification, and quality assurance sampling."[4]

After conducting a detailed review of our 2021 WMP activities, BVNA found that we met our goals for 143 out of the 147 initiatives in the WMP.[5] This included numerous areas where we exceeded our 2021 goals such as:

- Installing over 300 weather stations;
- Installing over 135 HD cameras;
- Hardening over 180 distribution line miles;
- Replacing over 1,200 non-exempt expulsion fuses;
- Installing over 250 distribution sectionalizing devices;
- Hardening over 1,500 wood pole replacement on transmission lines;
- Inspecting over 142 substations;
- Exceeding our goal for performing LiDAR inspections on both transmission and distribution lines;
- Hiring over 40 lineman and over 100 apprentices;
- Implementing SmartMeter detection software on over 400,000 locations;
- Installing Sensor IQ software on over 500,000 locations;
- Performing PSPS mitigation work at over eight substations;
- Preparing over 23 Service and Material Distribution Centers for backup generators;
- Repairing or replacing over 92 miles of conductors in HFTD areas; and

[2] PG&E 2022 Revised WMP, p. 2.

[3] IE Report, p. 6.

[4] IE Report, p. 6.

[5] *See* IE Report, pp. 56-57, 66-97.

- Undergrounding over 23 trench miles of overhead lines in Butte County.

In the IE Report, BVNA identified four instances of potential non-compliance with our 2021 WMP. We address those four initiatives in Section 2 of this response, below. BVNA also identified other areas of concern in several initiatives that did not rise to the level of potential non-compliance. We view these as areas for continued improvement and provide an explanation of the actions we are taking to respond to each of these items in Section 3 of this response. Finally, in Section 4 of this response, we discuss issues relating to funding of our 2021 WMP that were highlighted in the IE Report.

2. Potential Non-Compliance Issues Raised by BVNA

BVNA identified four initiatives that it considered non-compliant with our 2021 WMP. Although we do not agree that these issues constitute compliance issues, we appreciate BNVA raising these items and describe our efforts to remedy each of these issues to prevent their recurrence in the future.

a. Pole Loading Hardening and Replacement - 7.3.3.13

BVNA reviewed a sample of 500 pole loading calculation records out of a total of 61,710. Out of this sample, BVNA determined that four poles (or 0.8 percent of the sampled population) were classified as having a lower safety factor rating than was proper (they were classified as Grade "B" but should have been designated Grade "A"). BVNA also found that 15 poles were over-classified, and 22 poles were classified as "intermediate" even though General Order (GO) 95 does not allow for such a classification. Given these findings—particularly the finding that four poles were under-classified with a lower safety rating—we have instituted a programmatic check of 100 percent of our poles to verify key pole loading data and identify any classification issues. We anticipate this review will be complete by October 1, 2022 at the latest.

While we share BVNA's concern and are working to remedy these misclassifications, we do not interpret these findings as non-compliance with our 2021 WMP. First, we note that this initiative was not deemed to be a "commitment" as described in Table PG&E-5.2-1 of our WMP and no specific regulatory target for this work was set.[6] Second, while we strive to avoid making mistakes, we believe that for this particular initiative an error rate of less than 1 percent of poles being under-classified should be deemed compliant. Regardless of this difference of interpretation, we appreciate BVNA identifying these issues and have started the comprehensive review of our pole loading data and classifications to ensure our poles are correctly classified going forward.

b. Pole Loading Assessment Program – 7.3.4.13

The IE also noted that, although our target was to perform pole loading calculations on 160,000 poles in 2021, we were only able to perform calculations on 61,710 poles.[7] We previously reported this issue in our 2021 Quarterly Initiative Update, as well as in our 2022 WMP where

[6] *See* PG&E 2021 Revised WMP, pp. 258-264 and 589-590.

[7] IE Report, p. 42.

we explained this was the result of switching vendors due to underperformance by the previous vendor.[8] We required the new vendor to complete an extensive pilot project and demonstrate a solid foundation of high-quality work product before allowing the vendor to start working on this initiative.[9]

As with Initiative 7.3.3.13 above, we note this initiative was not categorized as a commitment and had no regulatory target set.[10] Furthermore, as described in our 2022 WMP, we have committed to making up these missed units in future years to ensure that this program remains on track to timely complete the ultimate program goal of analyzing all HFTD poles by the end of 2024.[11] Given that this was not a regulatory commitment, and we have already committed to ensuring this work will be completed by the program target date of 2024, we believe this work remains in compliance with our 2021 WMP.

c. Patrol Inspections of Distribution Lines – 7.3.4.11

The IE found recordkeeping errors in 427 out of 1,250 (34 percent) randomly-selected inspection records for distribution electric lines and equipment.[12] These records were found "to be inaccurate due to missing bar code numbers either on inspection form and/or photos, bar code numbers not matching between the inspection form and attached photos, or unable to read bar code on inspection form's attached photo."[13] We appreciate BVNA's observation and are determined to remediate this issue. While we view this as a recordkeeping issue (e.g. missing photos, unable to read bar codes, etc.) and not a compliance issue, the IE's finding raises concerns. Therefore, we reviewed the findings in order to create a formal plan to investigate and resolve this issue. The table below summarizes the findings of our investigation into the 427 locations where the IE found recordkeeping errors. For each category identified, we provide a corrective action, where necessary.

PG&E INVESTIGATION FINDINGS	CORRECTIVE ACTION	NUMBER OF FINDINGS
In 2021, inspectors were not required to verify or photograph barcodes for all poles, as this was still a pilot program. Therefore, photographs of barcodes were not provided for these poles.	Beginning in 2023, for all overhead inspections, inspectors will verify a barcode for the pole exists, is readable, and is correct. If a barcode is not already installed, the inspector will install the barcode.	189

[8] PG&E Revised 2022 WMP, pp.544-545.

[9] PG&E Revised 2022 WMP, pp.544.

[10] PG&E Revised 2021 WMP, pp. 258-264 and 666-667.

[11] PG&E Revised 2021 WMP, p. 590; PG&E Revised 2022 WMP, p. 545.

[12] IE Report, pp. 43-44.

[13] IE Report, p. 44.

A barcode was not included because no barcode exists for the pole in question.	We are in the process of installing bar codes on all of our poles after testing this as part of a pilot program.	135
No discrepancy was identified and the inspector's barcode photo matches the IE's barcode number.	Not applicable	48
The barcode is present but difficult to read without zooming in on the photograph.	Remind our inspectors of the appropriate photographing technique.	24
The inspector's barcode photo is correct but there is a discrepancy with the SAP barcode number.	We are investigating the discrepancies between the barcodes and will ensure they are corrected.	22
The barcode number from the inspector was determined to be correct, and the barcode number in SAP was updated after the inspection.	None, the corrective action has already been performed.	5
The barcode number noted by the IE is for the equipment on the pole, not for the pole.	Not applicable	4
TOTAL		**427**

We will be working diligently to resolve the discrepancies identified above, institute the corrective actions discussed, and prevent future recurrences of these types of errors.

d. Detailed Inspections of Transmission Lines and Equipment – 7.3.4.2

BVNA's audit also determined that six out of the 125 sampled records for detailed inspections of transmission lines and equipment showed recordkeeping discrepancies such as "a photo with the wrong structure number, [being] unable to read the structure number…[three] with no structure numbers and conflicting numbers between the inspection form and photo."[14] As with the issues identified by BVNA relating to our distribution line inspections, we appreciate the IE's observations and share the concern for accurate records. Our commitment for this initiative was to "complete detailed enhanced inspections and some form of aerial assessment (helicopter, drone, aerial lift, climbing) on the following recurrence intervals: (1) Tier 3 and Zone 1 — annually; and (2) Tier 2 — every three years."[15] Given that the commitment was to perform the inspections, we believe we complied with the WMP commitment when we completed the

[14] IE Report, pp. 44-45.

[15] PG&E 2021 Revised WMP, p. 263.

inspections. Regarding the six records with potential issues, we verified these records and confirmed that there were recordkeeping errors for two of the records, which have been corrected. For the remaining four records: two of the structures noted by BVNA to have missing structure numbers were corrected as part of the inspections at issue, and two of the structures noted to have incorrect structure numbers were found to be correct.

3. Other Issues Raised in the IE Report

The issues below were identified by BVNA but were determined not to rise to the level of non-compliance with our 2021 WMP. Despite these not being compliance issues, we believe these issues are worth addressing because they represent areas for us to continue to improve, and we address these issues below.

a. Location Inaccuracies in Data Provided

BVNA identified a small number of work locations that were located 100 to 200 feet from the GPS coordinates we provided. We reviewed the identified work locations and concluded that the locational information provided was sourced from job packages and other field collection activities, which we use to understand the general location of the assets requiring work or to travel to a job location. These general location coordinates can be subject to minor variation due to GPS accuracy limitations and/or field personnel coordinate collection processes. We concluded that the revised coordinates provided by BVNA match our GIS Asset Registry for the subject assets. We apologize for not clarifying that the GPS coordinates provided from the job packages can be less precise than those in our GIS Asset Registry. For future audits, we will ensure that we are also providing the GIS Asset Registry coordinates and the subject pole number to assist the IE in the audit process.

b. Weather Stations – 7.3.2.1.3

BVNA inspected data from all 308 weather stations we installed in 2021 and concluded that 13, or 4.4 percent, were not operating properly at time of inspection.[16] After receiving this finding, we reviewed current data from these 13 weather stations and confirmed that six of these stations were still not properly transmitting data, while the other seven had already been repaired and were functioning appropriately. Trouble tickets for inspection and repair had also been created for the six non-functioning weather stations.

We have processes in place to monitor the data from each station in the network and to create trouble tickets when issues are identified. These tickets are then used to dispatch repair crews. In remote areas, these stations can stop reporting for a variety of reasons, but issues occur most frequently due to the battery dropping below a critical voltage point of no return. The battery is needed to power either a cellular modem or L-Band satellite communication device to transmit data out. This voltage drop can be due to snow accumulation on the solar panel, multiple days of poor lighting from cloud cover, or any other potential blockage of sunlight needed to recharge the battery. Working with engineering and our vendor, potential solutions have been identified

[16] IE Report, p. 21.

for repairing and hardening each of these weather stations by installing a larger solar panel and lithium-ion battery at each station.

c. High-Definition Cameras – 7.3.2.1.4

As part of the auditing process, the IE inspected data from all 153 high-definition wildfire cameras that we installed in 2021 and found that six, or 3.9 percent, had an "unconfirmed operational status."[17] We sent inspectors to field verify the cameras at these locations and confirmed that two of the cameras are presently not in service — although they remain functional — and cannot be repaired without authorization from the US Forest Service (USFS), who controls the land where the cameras are located. We are currently working with the USFS to restore these cameras to service as expeditiously as possible. For the remaining four cameras, one was located in a site that has been retired and is no longer needed, while the remaining three are presently functional.

d. Surge Arresters Replacements – 7.3.3.17.3

BVNA inspected a sample of 315 surge arresters. BVNA's audit found that one location, where a surge arrester replacement took place, featured a pole that was "experiencing significant shell rot throughout the entire length of the pole, top crowning, and hardware pull-out."[18] We inspected this location and confirmed that the pole in question should be replaced. A maintenance tag has been created and the pole will be replaced within 90 days.

Additionally, BVNA identified one location that was out of compliance due to the presence of non-exempt, bushing mounted open-link fuses.[19] However, under the current guidance documents for this program, when replacing surge arresters, we do not require the replacement of all non-exempt equipment on the same pole and the presence of such equipment does not make that pole out of compliance. While we are currently considering whether there may be advantages to revising our guidance documents to include simultaneously replacing other non-exempt equipment when replacing surge arresters, we do not agree this is a WMP compliance issue.

e. Distribution Sectionalizing Devices – 7.3.3.8.1

The IE verified a sample of 36 distribution sectionalizing devices out of the 269 we installed in 2021. The IE found workmanship issues with two of the devices where: (1) fuse barrels were left on the structure or climbing steps; and (2) a large bird's nest was located in the middle of one of the sectionalizers. Similar to last year, we do not agree that leaving the fuse barrels on the structure is a workmanship defect.[20] It is our position that leaving fuse barrels on the non-climbing side of the pole below the FuseSaver is the recommended practice and meets or

[17] IE Report, p. 21.

[18] IE Report, p. 27.

[19] IE Report, p. 26.

[20] PG&E Response to Final Independent Evaluator Report Concerning 2020 Wildfire Mitigation Plan Compliance (PG&E Response to 2020 IE Report), p. 8 (Aug. 16, 2021).

exceeds the General Order (GO) 95 requirements. Regarding the bird's nest, we inspected the pole and determined the nest, which belongs to a family of American crows, is not an immediate ignition risk. Therefore, we have created a maintenance tag and will be removing the nest within the next 90 days now that the nesting season for American crows is ending.

f. Enhanced Vegetation Management (EVM) – 7.3.5.15-1

Although BVNA "determined that PG&E had effectively achieved its EVM initiatives as described in the 2021 WMP,"[21] BVNA found 233, or 13 percent, of the poles sampled were out of compliance with Public Resources Code (PRC) Section 4292 requirements.[22] Looking at BVNA's audit records, we determined that BNVA had 298 separate findings related to its inspections of our poles, as some poles were found to have multiple issues. We separated these 298 findings into two categories of work. The first category was EVM work, for which BVNA had 104 findings. In this category, at least one of three issues was present: (a) an encroachment on the 12-foot radial clearance where work was performed; (b) an encroachment on the four-foot overhang clearance; or (c) the presence of a high-risk tree in the fall zone. The second category of work was for pole clearing pursuant to PRC Section 4292, for which BVNA had 194 findings. In this category, the findings included either: (a) an encroachment on the 10-foot subject pole clearance; or (b) dry fuel located in the 10-foot pole clearance. Although our understanding was that this pole clearing work was not part of the audit and, therefore, was not included in the data we provided, we are addressing these findings below.

After inspecting the IE's 104 findings related to our EVM work, we confirmed BVNA's findings at five of the locations and disagreed with the findings at 99 of the locations. The most frequent reason for disagreement with BVNA's findings was that we determined the work had been properly performed but a subsequent growing season had occurred since performance and verification of the work, causing the encroachment noted by the auditor.[23] These locations would be inspected as part of our Routine VM cycle, and identified for work at that time. For the pole clearance work, of the 194 findings, we agreed with BVNA's findings at two locations, were unable to obtain access at one location due to customer constraints, and disagreed with the findings at 191 locations. The most common reason for misalignment with the IE's findings on this issue was that the pole was exempt from clearance work. For a detailed analysis of our findings, please refer to attachment "PGE IE Report Response Attach 1 EVM Findings.xslx" for a pole-by-pole description of our EVM inspection results and attachment "PGE IE Report Response Attach 2 Pole Clearing Findings.xlsx" for a similar analysis of our pole clearing work.

g. Transmission Right of Way Inspections – 7.3.5.3

BVNA inspected a sample of 20 miles of our transmission right of way work, which involved clearing a minimum 20-foot-wide right of way on 289 miles of lines that are identified for this

[21] IE Report, p. 6.

[22] IE Report, p. 29.

[23] We also highlighted this issue in our response to the 2020 IE Report. *See* PG&E Response to 2020 IE Report, p. 5.

based on the risk factors present on those lines.[24] BVNA identified one location in the 20 miles they inspected where vegetation encroached within this 20-foot-wide clearance area. We inspected this location, determined that BVNA correctly identified it as needing work, and have arranged for this area to be cleared.

h. Infrared Inspections of Distribution Lines and Equipment – 7.3.4.4

In reviewing the records of our infrared inspections of electric distribution lines and equipment, the IE found that two connector splices showed hotter than normal.[25] At the time of our inspection of these splices, we determined that one of the readings in the infrared inspection was measuring the temperature of the transformer and not the temperature of the splice.[26] Therefore, we determined that the temperature of this splice was normal and no further action was necessary. As for the second splice, it was determined to be hotter than normal, and a corrective maintenance tag was issued and resolved.

4. WMP Funding

a. Overview

BVNA assessed the funding activity for our 2021 WMP. The IE Report focused on specific areas where BVNA believed the actual amount of funding spent was lower than the forecasted amount. In response to BVNA's requests, we provided additional written detail for specific items and met with BVNA to discuss our cost model. In general, we agree with BVNA's findings, however, we would like to clarify a few specific items raised in the IE Report below.

In 2021, we spent approximately $4.8 billion on wildfire mitigation work as part of our WMP, which was less than the approximately $4.9 billion that we forecasted. This 2.13 percent decrease from the forecast to the actual spending was the result of several factors. In particular, our actual expense spending was $305 million higher than forecast, while our capital spend was $409 million lower than forecast, resulting in an approximate $104 million total variance from our forecast. The majority of this 2.13 percent variance was due to the mapping re-alignment of spending and the change in cost allocation methods (see the description of initiative 7.3.3.17.2 in Section 4b below).

The IE is directed by statute to "determine whether the electrical corporation failed to fund any activities included in its [wildfire mitigation] plan."[27] Given this foundational directive, we note that we did not "fail to fund" any activities included in the WMP. The analysis performed as part of the IE audit is a variance analysis illustrating how the assumptions around work plan and

[24] IE Report, pp. 14, 40.

[25] IE Report, p. 45.

[26] The temperature of the transformer was determined to be within the appropriate range and, therefore, no further action needed to be taken.

[27] Public Utilities Code § 8386.3(b)(2)(b)(i) ("As a part of the independent evaluator's report, the independent evaluator shall determine whether the electrical corporation failed to fund any activities included in its plan.").

unit cost drivers made when preparing the 2021 WMP compare to the actual drivers that factored into the 2021 recorded spend. Differences in spend are driven by financial and work plan factors, such as changes in work plan, strategy, risk assessment, and unit cost, and by the assumptions made to derive how to map specific work activities to the WMP initiatives.

As described in our reply to the 2020 IE report, it is important to note that our accounting system has evolved over many decades in conjunction with the California Public Utilities Commission's ("Commission") rate case process.[28] The 2020 WMP was the first time that we were required to break down our wildfire mitigation programs into the list of initiatives defined in the WMP. Even though not all our programs operationally correspond to the WMP-defined initiatives, we worked to fit our programs into these initiatives in the 2021 WMP to the best of our ability using a variety of allocation methodologies and assumptions to translate our investment plan into the Energy Safety-defined list of initiatives. However, this re-categorization process creates additional challenges because some of the financial discrepancies identified by BVNA are, in fact, the result of our attempts to align our funding categories with those described in the WMP. In addition, we continue to refine our WMP reporting and updated financials to align with programs and narratives described in various initiatives. This has resulted in some financials being re-mapped to different initiatives (for example, financials for our vegetation management initiatives were re-mapped), the removal of forecasts that are no longer applicable, and the addition of new forecasts for emerging wildfire work.

b. Specific Funding Categories

Despite the fact that, as identified by the IE, we spent less than forecasted on three sections of our WMP, it is important to note that we also spent more than forecasted on the seven other sections of our WMP. Indeed, our final actual spending was extremely close to the amount forecasted, with a variance of only 2.13 percent. Even more importantly, despite the challenges in developing accurate forecasts for this work and attempting to align our WMP spending with our rate case filings, PG&E provided funding for the important wildfire mitigation work contained in our WMP.

The largest underspend identified by the IE is from Section 7.3.3 of our WMP, which is comprised of our grid design and system hardening work, [29] and which is noted as having a variance of over $259 million.[30] More specifically, for initiative 7.3.3.17.2, BVNA identifies a variance of over $248 million.[31] Initiative 7.3.3.17.2 deals with system hardening of our transmission lines and encompasses a number of different projects including: (1) line de-energization, grounding, and removal; (2) transmission system islanding and temporary substation microgrids; and (3) overhead hardening, inspections, and maintenance.[32] Given the nature of this initiative as a home for multiple distinct projects, the forecast for initiative

[28] PG&E Response to 2020 IE Report, p. 9.

[29] PG&E 2021 Revised WMP, pp. 520-631.

[30] IE Report, p. 107.

[31] IE Report, p. 115.

[32] PG&E 2021 Revised WMP, pp. 614-615.

7.3.3.17.2 included projects that ended up being excluded from the WMP because they were determined not to be directly related to our wildfire mitigation work. At the time the forecast was being developed, we were still identifying potential projects to be included in our WMP, and the fact that some of these projects ended up being excluded from the WMP caused the forecast to be higher than the amount actually spent. Examples of these excluded projects such as the Wilson – Legrand 115KV line reconductoring, the Brighton-Clayton #2 idle circuit removal, and the Palermo-Wyandotte line reconfiguration.

The second largest underspend identified by BVNA is for Section 7.3.6 of our WMP, which relates to Grid Operations and Protocols.[33] BVNA notes a variance of over $104 million between the forecast and actual spend for 2021.[34] In particular, for initiative 7.3.6.4-D, involving protocols for PSPS re-energization of distribution lines, the IE notes a variance of $72.36 million.[35] However, this variance was not an underspend, as this money was instead allocated to other initiatives.[36] Additional information on the areas to which this money was allocated can be found in the IE Report, where we provide variance explanations for our initiative spending.[37]

The third largest, and last, category of work identified by the IE as underfunded is Section 7.3.7, which contains our data governance initiatives, [38] with a variance of over $52 million.[39] In particular, BVNA noted a variance of over $50 million for initiative 7.3.7.5. This initiative consists of 32 separate information technology (IT) projects that support our wildfire mitigation work.[40] However, as explained in the variance response provided to the IE, this decrease was the result of IT wildfire project costs being lower than expected, which resulted in less money being spent on this initiative than forecast.[41] Thus, while this was a cost savings, it did not limit or reduce the amount of wildfire mitigation work we were able to accomplish.

[33] PG&E 2021 Revised WMP, pp. 755-773.

[34] IE Report, p. 107.

[35] IE Report, Appendix, p. cclxxix.

[36] We note the IE Report inadvertently misstates that "[t]he decrease from the forecast to the actual spend was the result of the realignment of costs from other initiatives to this initiative" when it should instead state "from this initiative to other initiatives." IE Report, Appendix, p. cclxxix.

[37] IE Report, pp. 146-147.

[38] PG&E 2021 Revised WMP, pp. 774-807.

[39] IE Report, p. 107.

[40] PG&E 2021 Revised WMP, pp. 797-807.

[41] IE Report, pp. 150-151.

5. Conclusion

We are pleased with BVNA's overall findings demonstrating our commitment to our wildfire mitigation efforts. We take seriously the report's findings and have implemented corrective action plans to address the specific items identified above, as well as to make organizational improvements to prevent the recurrence of these issues. We look forward to continuing our work with Energy Safety and the Independent Evaluator to achieve our goal of ending catastrophic wildfires.

Very truly yours,

/s/ Jay Leyno

Jay Leyno