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BY ENERGY SAFETY E-FILING

Melissa Semcer
Deputy Director, Electric Infrastructure Directorate
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 2023-2025 Wildfire Mitigation Plan Guidelines**

Dear Deputy Director Semcer:

Pursuant to the instructions in the Office of Energy Infrastructure Safety’s (“Energy Safety”) September 19, 2022 letter, Pacific Gas and Electric Company (“PG&E”) submits the following comments on the Draft 2023-2025 Wildfire Mitigation Plan (“WMP”) Technical Guidelines (“Technical Guidelines”) and Process and Evaluation Guidelines (“Process Guidelines”). For efficiency, our feedback is organized in the same order as the Technical and Process Guidelines within Subsections I and II of these comments.

I. ITEMS IMPACTING FEASIBILITY TO MEET THE 2023-2025 WMP REQUIREMENTS

A. **PSPS Events Are Weather Dependent**

In Table 4-1 of Section 4.2 of the Technical Guidelines, Energy Safety provides an example of the minimum acceptable performance indicators of the utilities’ risk reduction objectives for the next three-year WMP cycle.¹ Several performance indicators relate to PSPS events, including the percentage reduction in the number of PSPS events. As stated in our 2022 WMP, PSPS events are weather dependent.² Therefore, the number of PSPS events is not reasonably within utility control. PG&E recommends that this metric not be used to evaluate the efficacy of a utility’s wildfire mitigation initiatives.

B. **Fundamental Risk Component Incorporation Takes Time**

¹ Technical Guidelines, p. 14.

² PG&E’s 2022 WMP Update, submitted July 26, 2022, p. 72.

Energy Safety identifies nine fundamental risk components that must be part of the utilities' risk analysis in Section 6.2.1 of the Technical Guidelines.³ Among these fundamental risk components are elements like Wildfire Hazard Intensity, Wildfire Exposure Potential, and Wildfire Vulnerability. In general, these are new data sets that the utilities are working to incorporate into modeling. However, given the timing of the Technical Guidelines, it is unlikely that they will be incorporated into the next version of models. PG&E recognizes the importance of these model updates and recommends that Energy Safety adopt a schedule to ensure the utilities have time to incorporate them in the future. This may also be addressed as part of a risk modeling workshop.

C. Independent Review for All Models May Not Be Feasible

In Section 6.6.1 of the Technical Guidelines, Energy Safety outlines that the utilities must report on their processes and procedures for independent review of data collected and generated to support risk decision making.⁴ PG&E uses a significant number of models to calculate risk across our service territory. Not all models are systematically reviewed by independent third parties pursuant to a developed procedure. This maturity will take time to develop. PG&E suggests that this portion of the WMP be satisfied by utilities describing which models, if any, have gone through third-party review and the efforts the utilities will undertake to establish policies for a more systematized review of their models for implementation in a later year.

D. Alignment with the 2018 S-MAP Proceeding May Not Be Possible This Year

In Section 7.1.4.1 of the Technical Guidelines, Energy Safety emphasizes that the utilities must describe their procedures for evaluating options for mitigating wildfire and PSPS risk, as governed by the 2018 Safety Model Assessment Proceeding (2018 S-MAP), adopted in D.18-12-014 (see S-MAP, step 3, rows 15–25).⁵ Energy Safety also states that the utilities' process to evaluate risk mitigation options must align with any changes to that proceeding. However, the 2023-2025 WMP spans a three-year period, and changes to the decision made in D.18-12-014 will likely be coming out in December 2022. Given this fact, there will likely not be enough time to incorporate any such changes into the 2023-2025 WMP. Moreover, it does not appear that there will be an opportunity to update the 2024 WMP. For these reasons, PG&E recommends that the utilities not be required to incorporate feedback from changes made to D.18-12-014 in the 2023-2025 WMP. This issue should be re-evaluated before the next utility WMP update.

E. Not All Community Information Is Predictive

In Appendix B, Section 1.1.12.5 of the Technical Guidelines, Energy Safety states that the utilities must outline the methodology used to determine the vulnerability/resilience of a community to a wildfire that reaches the community.⁶ The calculation must include vulnerable

³ Technical Guidelines, p. 50-51.

⁴ Technical Guidelines, p. 66.

⁵ Technical Guidelines, p. 76.

⁶ Technical Guidelines, Appendix B, p. 21.

populations, legacy building codes, community collaborative wildfire preparedness, and availability of ingress and egress. While these are important items to consider when evaluating wildfire consequence, not all will be predictive. Accordingly, PG&E recommends that models not be required to include all these calculations. If certain calculations are not included, the utilities may present facts as to why they are not for consideration by Energy Safety.

F. The Change Order Process Should Be More Flexible

In Section 2.3 of the Process Guidelines, Energy Safety states that it will “evaluate and approve or deny the utilities’ WMPs for both 2023 and 2024 in 2023” and that “in 2024, electrical corporations will submit a WMP Update for 2025.”⁷ Section 12 states that change requests for approved mitigation initiatives based on an updated understanding of risk must take place via the Change Order process.⁸ Changes will only be allowed for initiatives involving the larger risk, grid design, vegetation management, or PSPS categories.⁹ The changes must be in response to an increase or decrease of more than 25% of an initiative’s risk reduction value or a significant shift in either the strategic direction or purpose of an initiative.¹⁰ Utilities are not allowed to request changes based on feasibility or fundamental changes in strategy.¹¹

PG&E recommends that the Change Order process be modified to allow for mitigation initiative updates based on strategy changes for reasons beyond risk alone. Historically, utilities have updated initiative targets annually as part of the required WMP submissions.¹² Target updates reflect risk modeling changes, but they also reflect lessons learned from the prior fire season and implementation of new wildfire mitigation initiatives. If the utilities cannot update their 2024 initiative targets without demonstrating a significant change in risk scoring, lessons learned from 2023 will not be incorporated into WMP work for the benefit of customers and communities until at least 2025. In addition, utilities will be evaluated for WMP compliance in completing initiative targets at the end of 2024 that were set more than 18 months earlier. This does not appear to reflect the intent of the annual WMP update requirement.

II. ITEMS FOR CLARIFICATION

A. Objective and Performance Metric Terminology Is Unclear

In Section 4.2 of the Technical Guidelines, Energy Safety provides examples of “outcome-based objectives” for the 2023-2025 WMP cycle.¹³ Thereafter, in various places in

⁷ Process Guidelines, p. 2.

⁸ Process Guidelines, pp. 21-22.

⁹ Process Guidelines, p. 22.

¹⁰ Process Guidelines, p. 22.

¹¹ Process Guidelines, p. 22.

¹² See generally, Public Utilities Code § 8386.

¹³ Technical Guidelines, pp. 13-15.

Section 8, Energy Safety describes the “performance metrics” that the utilities should use to evaluate the efficacy of their mitigation plans.¹⁴ It is unclear whether these two metrics should overlap or be different.

During the October 17, 2022 workshop relating to the 2023-2025 WMP Guidelines (the “Workshop”), Energy Safety confirmed that the “outcome-based objectives” identified in Section 4.2 should be revised to “performance metrics.” PG&E appreciates this clarification and requests that it be reflected in the final Technical Guidelines.

B. Service Territory Mapping Should Use GDB Formatting

Section 5.1 of the Technical Guidelines requests information on a utility’s service territory.¹⁵ We believe the requirements in this Section could be clarified to explain that the geospatial maps requested are to be produced in GDB format rather than in PDF format. Given that the requested information on a utility’s service territory could require thousands of PDFs to be created, it would be beneficial to clarify that the format for the geospatial maps requested should be in GDB format.

C. People At Risk Across the Service Territory Should Be Defined

In Section 5.4.3.1 of the Technical Guidelines, Energy Safety asks each utility to “provide a brief narrative (one to two paragraphs) describing the total number of people and distribution of people at risk across its service territory.”¹⁶ Although not directly stated, PG&E understands this request to be speaking about people at risk *of wildfire* across the service territory. Based on this understanding, the number of people at risk of wildfire across the service territory would be those located in the HFTD and other High Fire Risk Areas (HFRA), as defined by the utilities.

At the Workshop, Energy Safety confirmed this general interpretation. PG&E appreciates this clarification and requests that the final Technical Guidelines be amended to state that an electrical corporation must “provide a brief narrative (one to two paragraphs) describing the total number of people and distribution of people at risk *of wildfire* across its service territory.”

D. The Definition of Social Vulnerability Should Be Uniform

In section 5.4.3.4 of the Technical Guidelines, a utility “must provide a brief narrative describing the intersection of social vulnerability and community exposure to electrical corporation wildfire risk across its service territory.”¹⁷ We agree that providing this information is important, but we request that the definition of a socially vulnerable community be aligned

¹⁴ See, e.g. Technical Guidelines, pp. 93-94.

¹⁵ Technical Guidelines, p. 21.

¹⁶ Technical Guidelines, p. 37.

¹⁷ Technical Guidelines p. 38.

with the definition used by the CPUC for disadvantaged vulnerable communities (“DVCS”) in its Energy Utility Climate Change Vulnerability Assessments. On pages 12-13 of Decision 20-08-046, the CPUC defined DVCs as:

Communities in the 25% highest scoring census tracts according to the most current versions of the California Communities Environmental Health Screening Tool (CalEnviroScreen), as well as all California tribal lands, census tracts that score in the highest 5% of Pollution Burden within CalEnviroScreen, but do not receive an overall CalEnviroScreen score due to unreliable public health and socioeconomic data, and census tracts with median household incomes less than 60% of state median income.

By using a common definition that is already in use on a state-wide basis, this would allow for greater sharing of information amongst state agencies and stakeholders and further the goals of this important work.

E. The Distinction Between Wildfire and Ignition Likelihoods Definitions Is Unclear

In Section 6.2.1 of the Technical Guidelines, Energy Safety describes five intermediate risk components, which include ignition likelihood and wildfire likelihood.¹⁸ Ignition likelihood is defined as “the total anticipated annualized number of ignitions resulting from electrical corporation-owned assets at each location in the electrical corporation’s service territory.” Wildfire likelihood is defined as “The total anticipated annualized number of fires reaching each spatial location resulting from utility-related ignitions at each location in the electrical corporation service territory.” The distinction between these definitions is not clear, especially given that there is no difference between the definitions of “wildfire risk” and “ignition risk” in Appendix A of the Technical Guidelines. PG&E recommends that these two items be further clarified before the Technical Guidelines are final.

F. The Term Consideration Should Be Clarified for Wind Loading Calculations

Section 6.3.1 of the Technical Guidelines relates to Design Basic Scenarios. In that section, Energy Safety states that the utilities must “consider” at least four statistically relevant design conditions for wind loading, including: Baseline, Very High, Extreme, and Credible Worst Case.¹⁹ It is unclear whether the utilities are required to incorporate these design scenarios in their modeling or if they are allowed to consider the design scenarios and ultimately choose not to use them based on documented subject matter expertise or other considerations. If design scenarios are ultimately required in the final Technical Guidelines, PG&E requests that this item be clarified.

G. The Vegetation Fuel Load Modeling Requirements Are Unclear

¹⁸ Technical Guidelines, p. 50.

¹⁹ Technical Guidelines, p. 58.

Energy Safety also describes vegetation condition design modeling scenarios in Section 6.3.1. Energy Safety says that the utilities must consider vegetation conditions comprising the existing fuel load, a short-term (3 year) forecasted fuel load, and a long-term extreme fuel load.²⁰ It is unclear whether this portion of the Technical Guidelines contemplates the creation of three separate models to evaluate the three different timelines or if Energy Safety is interested in one model to evaluate multiple load conditions at different times. This distinction is important because typically an operations model will be based on existing load fuels, while a planning model will look at long-term trends (30-40 years). Therefore, it is unclear what value is added by looking at short-term fuels. If these types of design scenarios are ultimately required in the final Technical Guidelines, PG&E requests that this item be clarified.

H. Areas of Heightened Fire Risk Should Be Expressly Defined

In Section 6.4.1 of the Technical Guidelines, Energy Safety asks the utilities to use their own modeling to calculate the highest wildfire risk circuits in their service territories, regardless of HFTD status.²¹ The utilities are then to provide geospatial maps of areas at a “heightened risk of fire.” PG&E seeks to confirm that areas at a “heightened risk of fire” refers to areas within the top 5% and top 20% of wildfire risk, as described in Section 6.4.1.1. If not, PG&E is unclear what definition should be used, and whether the term should align with other definitions for elevated or extreme wildfire risk used throughout the Technical Guidelines.

Section 6.4.1.2 also requires the utilities to “describe [their] proposed process[es] to submit proposed changes to the Commission to modify the HFTD.”²² At the same time, the utilities “need not conclude that the HFTD should be expanded and/or modified.”²³ Given these two instructions, PG&E understands this request to be for an explanation of the process each utility would use to approach the CPUC to modify the HFTD designations, if desired, and not an instruction to propose changes at this time. PG&E recommends that this clarification be made in the Technical Guidelines.

I. Enterprise System Risk Should Be Limited to Wildfire and PSPS Risk

Energy Safety states that the utilities must provide an overview of inputs, operation, and support for a “centralized risk assessment enterprise system” in Section 6.5 of the Technical Guidelines.²⁴ This request is overbroad because it appears to ask for information regarding all of a utility’s risk assessment data, rather than focusing on wildfire and PSPS risk. PG&E requests that this portion of the Draft Guidelines be clarified to only relate to wildfire and PSPS risk.

J. Does “Overall Risk” Mean “Overall Utility Risk”?

²⁰ Technical Guidelines, p. 59.

²¹ Technical Guidelines, pp. 62-63.

²² Technical Guidelines, p. 63.

²³ Draft Guidelines, p. 63.

²⁴ Technical Guidelines, p. 66.

Section 7.2.2.1 of the Technical Guidelines states that “the objective of the service area risk reduction summary is to provide an integrated view of wildfire risk reduction across the electrical corporation service territory.”²⁵ Table 7-2 then asks for “overall risk” scores by year. Unfortunately, the term “overall risk” is not defined. PG&E would like to clarify whether (1) the term “overall risk” has the same definition as “overall utility risk” meaning that it incorporates PSPS *and* ignition risks and (2) whether the “overall utility risk” score should be used for calculating the percentage risk reduction figures in each initiative target table in Section 8.

At the Workshop, Energy Safety confirmed that the “overall risk” scores identified in Table 7-2 refer to “overall utility risk,” and these scores should be used for each initiative target table in Section 8. PG&E appreciates this clarification and requests that the final Technical Guidelines be revised accordingly.

K. Reporting on Initiative Objectives and Targets Is Uncertain

Section 8 of the Technical Guidelines describes the initiative objectives and targets that the utilities should create to guide their wildfire mitigation plan implementation.²⁶ Based on our review, initiative objectives must be quantifiable, while objectives are broader, qualitative activities to meet WMP goals. With this in mind, PG&E seeks to clarify whether every subsection of Section 8 that speaks about targets (e.g. Section 8.3.1.2) and objectives (e.g. Section 8.3.1.1) must have at least one associated target and objective. In addition, it is unclear whether the utilities will be required to report externally on just the targets, or the targets *and* objectives, quarterly or annually in 2023. PG&E requests that these questions be clarified in the Technical Guidelines or at a workshop with stakeholders.

L. Where Mitigation Initiative Narrative Descriptions Are Required Is Unclear

In Section 8.1.2 of the Technical Guidelines, Energy Safety asks for a narrative description of each mitigation initiative identified in Section 7.2.3 to be provided in sections 8.1.2.1-12, which correspond to the twelve Grid Design and System Hardening initiatives.²⁷ However, Section 7.2.3 appears to apply to *all* mitigation initiatives in the 2023-2025 WMP and not just those associated with Grid Design and System Hardening. For example, Section 7.3.2 also addresses Vegetation Management and Situational Awareness mitigation initiatives. Therefore, it is unclear what is required in response to Section 8.1.2, and PG&E requests clarification of the following questions:

- Do the narrative instructions in Section 8.1.2 apply to all mitigation initiatives or just those related to Grid Design and System Hardening?
- Are narratives required for mitigation initiatives even if they do not have initiative targets?

²⁵ Technical Guidelines, p. 80.

²⁶ See, e.g., Technical Guidelines, pp. 88-92.

²⁷ Technical Guidelines, p. 95.

- If a utility identifies other Grid Design and System Hardening initiatives beyond the twelve identified by Energy Safety, does it continue numbering beyond 8.1.2.12?

M. What Open Work Orders Are Included in Section 8.1.7?

Section 8.1.7 of the Technical Guidelines requires utilities to “provide an overview of the process it uses to manage its open work orders.”²⁸ This section is in between sections on Quality Assurance/Quality Control of asset inspections and Grid Operations and Procedures. Given the language of the section 8.1.7, and its placement in relation to other sections, it is not clear to which open work orders this section applies. To prevent confusion and different responses among the utilities, we believe this section would benefit from additional clarity as to what work orders are encompassed by this section.

N. “Off-Normal Events” Should Be Defined

In the Technical Guidelines, Section 8.1.8.1, Energy Safety sets forth areas for discussion specific to “equipment settings to reduce wildfire risk.”²⁹ PG&E’s primary program involving equipment settings to reduce wildfire risk is the Enhanced Powerline Safety Settings (“EPSS”) program. Under PG&E’s EPSS program, the proposed topic areas for discussion under Section 8.1.8.1 are clear except for the topic described as “the electrical corporation’s operations procedures for response to off-normal events.” This topic is vague and ambiguous as to the term “off-normal event.” PG&E requests that Energy Safety clarify the term “off-normal events” or consider elimination of this area.

O. Fire-Wise Right-of-Ways Needs Clarification

In Section 8.2.3.6 of the Technical Guidelines, the utilities must provide an overview of their actions (including strategic use of herbicides, growth regulators, or other chemical controls) taken “to promote vegetation communities that are compatible with use of the land as a utility right-of-way, sustainable, and fire-wise, and actions to control incompatible vegetation, on the landscape where electrical equipment operates.”³⁰ PG&E requests that the term "fire-wise" be specifically defined because the term is commonly used in the following ways: 1) a cooperative effort among local, state, federal and private agencies and organizations to promote fire safety in the wildland/urban interface; and 2) the communities program developed by the national fire protection association, which encourages local solutions for wildfire safety by involving homeowners, community leaders, planners, developers, fire- fighters, and others in the effort to protect people and property from wildfire risks.

At the Workshop, Energy Safety clarified that the term “fire-wise” reflects the utilities’ actions to make a right of way more fire resilient. This would include thinning trees, planting

²⁸ Technical Guidelines, p. 100.

²⁹ Technical Guidelines, p. 101.

³⁰ Technical Guidelines, p. 119.

fire-resistant vegetation etc. PG&E appreciates this additional information and asks that a definition of “fire-wise” be included in the final Technical Guidelines.

P. Emergency Response Vegetation Management Should Focus on Wildfire

The utilities must provide an overview of the following emergency response vegetation management activities under Section 8.2.3.7 of the Technical Guidelines: (1) activities based on weather conditions and (2) post-fire service restorations.³¹ PG&E suggests that to avoid overlap with our Company Emergency Response Plan (CERP), this subsection be tailored to focus on emergency response vegetation management activities to mitigate wildfire caused by utility facilities and outages caused by wildfire. In this way, PG&E can provide information on PSPS damage, EPSS vegetation caused outages, and post-fire activities.

Q. Vegetation Management Enterprise System Integration Is Unclear

In Section 8.2.4 of the Technical Guidelines, the utility must provide an overview of its centralized vegetation management enterprise system, including a discussion of vegetation inventory and condition databases, describe the utilities internal documentation of its databases, integration with the systems in other lines of businesses, integration with the auditing systems (QA/QV) internal processes for updating enterprise system including databases and any planned updates, and any changes to the initiative since the last WMP and an explanation as to why those changes were made.³² While PG&E is happy to provide an overview of our centralized vegetation management enterprise system, we would benefit from a definition of the term “Inputs” as used in this section. Additionally, regarding integration, we request a clarification of whether Energy Safety is seeking information about what is capable of being integrated or what is currently available for integration.

R. Situational Awareness Performance Metrics Should Be Standardized

Section 8.3.1.3 of the Technical Guidelines requires the utilities to “list and describe performance metrics” for a number of categories, including the “effectiveness of its situational awareness and forecasting in reducing wildfire and PSPS risk.”³³ We appreciate the intent of this request, however, we are concerned that without standardization or guidance from Energy Safety, each utility will develop its own metric and methodologies for evaluating the effectiveness of its situational awareness and forecasting programs. If this occurs, it would reduce the effectiveness of the performance metrics since they will not be comparable across utilities. Therefore, we recommend that the performance metrics be standardized and not merely left to each utility to create.

S. The Pre-Submission Check Should Be an Administrative Review

³¹ Technical Guidelines, p. 120.

³² Technical Guidelines, p. 122.

³³ Technical Guidelines, p. 131.

In Section 10.5 of the Process Guidelines, Energy Safety states that “each electrical corporation must submit its WMP pre-submission to the relevant year’s WMP docket.”³⁴ At the Workshop, Energy Safety confirmed that the pre-submission WMP filing would be available to the public. By making the pre-submission WMP public, it is subject to stakeholder discovery.³⁵

Inasmuch as the pre-submission “completeness check is not a substantive review of WMP content,”³⁶ PG&E recommends that it be categorized as an administrative process that does not require uploading materials to the WMP docket. In this way, substantive discovery does not take place regarding WMP filings that are not final. Further, if the pre-submission WMPs are open to discovery, stakeholders and Energy Safety will be unnecessarily duplicating efforts in evaluating the completeness of the utilities’ plans. For these reasons, PG&E requests that the large utilities be allowed to wait until March 27, 2023 to upload their final WMPs to the docket.

CONCLUSION

PG&E appreciates Energy Safety’s efforts to refine the 2023-2025 WMP process. We respectfully submit these comments and look forward to continuing to work with Energy Safety and other stakeholders to promote wildfire safety.

Should you have any questions, please do not hesitate to contact the undersigned at jay.leyno@pge.com.

Very truly yours,

/s/ Jay Leyno

Jay Leyno

³⁴ Process Guidelines, p. 18.

³⁵ See generally Section 8 of the Process Guidelines, pp. 13-15.

³⁶ Process Guidelines, p. 3.