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**BY ELECTRONIC FILING**

Melissa Semcer  
Deputy Director, Electric Safety Policy Division  
Office of Energy Infrastructure Safety  
California Natural Resources Agency  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

Re: **Comments on Substantive Revision to 2023 Maturity Survey**  
***Docket: 2023-2025-WMPs***

Dear Deputy Director Semcer:

Pacific Gas and Electric Company (PG&E) respectfully submits these comments on the March 3, 2023 Substantive Revision to the 2023 Maturity Survey by the Office of Energy Infrastructure Safety (Energy Safety).

**I. Removal of the 18 Maturity Survey Questions Identified by Energy Safety**

We appreciate the effort Energy Safety has made to revise and improve the Maturity Survey, including issuing multiple drafts of the survey and holding public hearings to provide context and gather input. We agree that the 18 questions identified by Energy Safety should be removed from the survey. However, we strongly believe that the survey would be further improved if additional revisions were made beyond removing these 18 questions. In finalizing our Maturity Survey response, we identified a substantial number of questions for which revision and/or removal would be appropriate. Specifically, we identified 119 questions that should be revised to better demonstrate maturity, 272 with ambiguities that required interpretations be summarized, 165 that required clarifying comments because the utility's capability could not be accurately described, and 92 questions that we believe are inapplicable to utilities.<sup>1</sup> In total, we provided at least one comment on 498 of the 1,159 questions, or 43 percent.

Our formal response to the Maturity Survey provided comments for each of the problematic questions identified above, and we will not repeat them here. Instead, we wish to provide a suggested process improvement for preventing the recurrence of this issue next year, and to identify key themes that became apparent when working through our responses to the survey.

**II. The Establishment of a Joint Working Group to Refine the Questions in the**

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<sup>1</sup> These issues are not exclusive, and some questions identified in the numbers provided above fall into more than one of these categories.

## **Maturity Survey Would Allow Energy Safety to Better Measure Maturity**

Given the importance and size of the Maturity Survey, we believe it is critical that Energy Safety establish a joint Energy Safety/utility working group to refine the Maturity Survey questions.<sup>2</sup> Due to the sheer size of the survey, with over 1,100 questions, a working group that meets on a regular schedule to discuss, understand, and refine the questions would improve the quality of the results and provide Energy Safety with the best possible method for annually improving the maturity of each utility. To this end, we believe that the proposal to remove the 18 questions identified by Energy Safety is an excellent example of why there is a need for a regular working group that could help prevent these types of last-minute changes to the survey in the future.

### **III. Key Themes Present in the Maturity Survey Where Revision Would Be Beneficial**

To avoid simply repeating the comments submitted with our Maturity Survey, we identify a few key themes below that emerged from our review of the Survey and which we believe are not fully addressed by the removal of the 18 proposed questions.

#### **a. Penalizing Utilities for Items Outside Their Control**

A number of questions penalize the utilities for items over which they have no control, such as the actions of government agencies or public safety partners. Since it is inappropriate to determine maturity based on the actions of other parties, these types of questions should be revised or removed to provide a better understanding of a utility's maturity. For example, question 6.1.1.Q6 asks: "Are at least 50% of the electrical corporation emergency and disaster preparedness plans integrated into relevant public safety partner's emergency plans within the service territory?" Since a utility has no control over what public safety partners decide to integrate, this is not an appropriate way to measure maturity. Other examples of this issue include, among others, questions 6.1.1.Q7, 6.1.3.Q13, 6.1.3.Q14, 6.2.1.Q3, 6.2.1.Q5, 6.2.1.Q6, 6.2.2.Q11, 6.4.2.Q2, and 6.4.2.Q3.

#### **b. Requiring Utilities to Act Where Action Would Be Unwelcome**

Other questions, including nine of the 18 identified by Energy Safety,<sup>3</sup> would require utilities to take action where that action would be unwelcome by a particular government agency or organization, often in the field of emergency preparedness. An example of this can be found in question 6.3.1.Q7, which asks: "Does the electrical corporation automatically communicate instructions for emergency action to members of the public and public safety partners?" Direct emergency actions instructions are directed by county OES, Cal OES, local emergency management agencies and/or local first responders. Given that these agencies do not want potentially conflicting information being presented to the public during emergencies, this is not an appropriate indicator of maturity. Other examples of this issue include, but are not limited to,

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<sup>2</sup> See also Pacific Gas & Electric Company's Comments on the Draft 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey at 1-2 (Oct. 26, 2022).

<sup>3</sup> See questions 6.3.1.Q2, 6.3.4.Q10, 6.3.4.Q11, 6.3.4.Q13, 6.3.4.Q15, 6.3.4.Q17, 6.3.4.Q18, 6.3.4.Q21, and 6.3.4.Q28.

questions, 6.1.1.Q8, 6.1.4.Q3, 6.1.4.Q4, 6.1.4.Q6, 6.3.1.Q3, 6.3.1.Q4, 6.3.1.Q8, 6.3.2.Q2, and 6.3.4.Q7.

**c. Actions Where the Negative Impact on Ratepayers Would Exceed the Benefit of the Requested Action**

Some questions recommend that the utilities undertake actions where we strongly believe the benefit of the actions (i.e., the risk reduction) would be significantly outweighed by the cost to perform it and end up being a negative value for ratepayers. An example of this is question 1.1.5.Q10 which asks: “Does modeling software include a large eddy scale weather module?” Large eddy simulations are extremely expensive to run, particularly across a large service territory. Given the expense and limited benefit, we do not believe this is an appropriate measure of maturity. Other examples of this issue include, among others, questions 1.1.2.Q6, 1.1.2.Q8, 1.1.5.Q6, 1.3.1.Q3, 1.3.1.Q4, 1.3.2.Q1, 1.6.5.Q5, 3.4.1.Q2, 3.4.6.Q8, and 3.5.4.Q10.

**d. Questions Potentially Based on Incorrect Scientific/Technical Assumptions**

Certain questions appear to be based on incorrect scientific or technical assumptions, undercutting the survey’s ability to gauge maturity. For example, question 5.3.3.Q9 asks: “Are PSPS events conducted such that de-energized circuits have sufficient redundancy to avoid disruption in energy supply to customers?” Since redundancy on PSPS circuits would defeat the purpose of PSPS events and increase wildfire risk, this question does not properly measure maturity. Other examples of this issue include, but are not limited to, questions 1.1.7.Q10, 1.1.9.Q4, 1.1.9.Q5, 4.3.3.Q6, 4.3.3.Q7, 4.4.4.Q7, 5.4.1.Q1, 6.3.4.Q16, and 6.4.1.Q1.

**e. Requiring the Public Sharing of Proprietary or Confidential Information**

There is also a subset of questions that would require the utilities to share information that is proprietary or confidential, including information that does not belong to the utilities but instead to third party contractors who have created the information in question. Certainly, maturity should not be judged based on the sharing of information that would be harmful if publicly disclosed, or which belongs to another entity and is protected by contract. An example of this can be found in question 1.3.7.Q6, which asks: “Are model software source code and data for verification and validation available to the public?” Given that much of our software source code is created and owned by third party contractors, we are contractually prohibited from making it available to the public and this is not indicative of maturity. Other examples of this issue include, but are not limited to, questions 1.3.7.Q4, 1.3.7.Q5, 2.1.8.Q4, 2.2.11.Q1, 2.2.11.Q8, 2.3.7.Q4, 2.3.7.Q5, 2.4.6.Q4, and 2.6.5.Q2.

**f. Repetitive Questions That Penalize Utilities Multiple Times for the Same Issue**

The Maturity Survey also contains questions which effectually penalize the utilities multiple times for the same issue. These questions are related, and when the utility responds to the first question with a no, or with a low score, the utility is required to answer each subsequent question in the series with the same response. An example of this issue can be found in questions 1.4.2.Q10 and 1.4.5.Q1, which are nearly identical and would both unfairly penalize or reward a utility by doubling the scoring value of a single issue. Another example of this issue includes,

among others, questions 2.6.4.Q1, and 2.6.4.Q4.

**g. Vague and Ambiguous Questions**

Lastly, there were a significant number of questions that were vague and ambiguous or subject to varying interpretations. Without further clarity these questions could be interpreted differently by each utility and decrease the value of the survey results. An example of this includes question 2.1.9.Q1, which asks: “Is the statistical uncertainty in model outputs known and documented in accordance with Energy Safety requirements?” Despite a diligent search, we were unable to determine what Energy Safety requirements were being referenced, leaving this question open for interpretation. Other examples of this issue include, but are not limited to, questions 1.4.1.Q2, 1.4.1.Q3, 1.4.1.Q4, 2.1.9.Q5, 2.6.5.Q3, 5.4.Q11, 5.2.2.Q1, 5.2.2.Q2, and 5.2.5.Q2.

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We appreciate the opportunity to provide feedback on Energy Safety’s revisions to the Maturity Survey. We look forward to continuing to collaborate with Energy Safety on improving our processes and programs year over year. Should you have any questions or concerns, please do not hesitate to contact the undersigned at [jay.leyno@pge.com](mailto:jay.leyno@pge.com) or Wade Greenacre at [wade.greenacre@pge.com](mailto:wade.greenacre@pge.com).

Very truly yours,

*/s/ Jay Leyno*

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