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June 6, 2023

VIA ELECTRONIC FILING

Caroline Thomas Jacobs, Director  
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California Natural Resources Agency  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

**RE: MUSSEY GRADE ROAD ALLIANCE REPLY COMMENTS ON 2023-2025 WILDFIRE MITIGATION PLANS OF PG&E, SCE, AND SDG&E**

Dear Director Thomas Jacobs:

The Mussey Grade Road Alliance (MGRA or Alliance) files these reply comments pursuant to the 2023 Wildfire Mitigation Plan Schedule<sup>1</sup> provided by the Office of Energy Infrastructure Safety (OEIS or Energy Safety) which authorizes public comment on the Large Utility Wildfire Mitigation Plans (WMPs) by May 26, 2023 and reply comments by June 6, 2023.

A number of stakeholders provided feedback in their opening comments and we have little to add. However, some of their requests can be further enhanced and elaborated upon. Additionally new information affects some stakeholder recommendations and we will provide that.

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<sup>1</sup> 2023-2025-WMPs; Office of Energy Infrastructure Safety; 2023 Wildfire Mitigation Plan Schedule; p. 3; TN11750\_20221207T144222\_2023\_WMP\_Schedule. (2023 Schedule)

Respectfully submitted this 6<sup>th</sup> day of June, 2023,

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On behalf of the Mussey Grade Road Alliance.

## WILDFIRE MITIGATION PLAN REPLY COMMENTS ON BEHALF OF THE MUSSEY GRADE ROAD ALLIANCE

The Mussey Grade Road Alliances' (MGRA or Alliance) Wildfire Mitigation Plan comments are authored by MGRA's expert witness Joseph W. Mitchell, Ph.D.<sup>2</sup>

### 1. CAL ADVOCATES RECOMMENDATIONS

A number of stakeholders, including Cal Advocates, TURN, Green Power Institute, and others have provided a great quantity of excellent feedback of which MGRA is wholly supportive, and which supplements and/or complements MGRA Comments.

We note, however, that in its remedies for some utility issues, Cal Advocates' remedy appears too conservative and may have undesirable effects.

For example on p. 23 of Cal Advocates' Opening Comments<sup>3</sup> they provide PG&E suggestions:

*“Provide a detailed justification for scaling back its covered conductor program.*

- *Examine the viability of substantially increasing the pace and mileage of covered conductor, particularly with an emphasis on locations that are difficult to underground.*

- *Provide a detailed justification for scaling back its REFCL program.*

*PG&E should file these supplements by August 2023 and update them annually in 2024 and 2025. Energy Safety should review these supplements and issue a determination of additional actions for PG&E to take, should it find PG&E's plans inadequate.”<sup>4</sup>*

Likewise, in its review of Southern California Edison's IWMS program, Cal Advocates suggests: *“In conclusion, Energy Safety should require SCE to provide more justification in its 2024*

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<sup>2</sup> M-bar Technologies and Consulting, LLC; <http://www.mbartek.com>; Email: [jwmitchell@mbartek.com](mailto:jwmitchell@mbartek.com). Dr. Mitchell is also a board member of the Mussey Grade Road Alliance.

<sup>3</sup> Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities; May 26, 2023; p. 23.

<sup>4</sup> Id.

*WMP update, for its transition to a mitigation strategy that is primarily focused on the consequences of wildfires,*”<sup>5</sup> and,

*“Energy Safety should direct SCE to provide additional information demonstrating the effectiveness of its novel Integrated Wildfire Mitigation Strategy at targeting and prioritizing areas with intolerable risk consequences.”*<sup>6</sup>

With all due respect to Cal Advocates, who have identified key shortcomings in the utility plans, requesting “more justification” on top of the massive “justification” already found in the 2023 WMPs is an invitation for the utilities to simply say more of the same. And in the meantime, utilities will be moving forward with these plans and implementing them.

MGRA suggests that Energy Safety take a much more assertive approach. Specifically, for radical new utility programs that violate previous guidance from Energy Safety or the CPUC, Energy Safety should either deny or postpone approval of WMPs until the utilities provide justification that meets OEIS and CPUC guidelines. If the utilities want to do something radically different than was alluded to in previous approved WMPs, it is their burden to prove that their activities enhance safety and are in the interest of the ratepayers. It is important that the OEIS and stakeholders realize that the utilities are in the middle of their GRC processes and are actually executing on some of these new initiatives. Energy Safety’s leverage in the next year’s update will be lesser, since many utility changes will already be underway. Strong action is required now.

## **2. PROCESS FOR INCLUDING COMPARISONS WITH UNDERGROUNDING**

Many stakeholders, including MGRA, noted that the utilities in general were directed to compare their undergrounding programs directly with alternative mitigations in combination, such as covered conductor plus REFCL. For example Cal Advocates notes that *“PG&E has not effectively compared undergrounding to combinations of mitigations as directed by Energy Safety. Covered conductor is effective at mitigating phase-to-phase faults, while other technology such as rapid earth-fault current limiter (REFCL) is effective at mitigating phase-to-ground faults. The combination of such complementary technologies may result in a highly effective and scalable alternative to undergrounding.”*<sup>7</sup> TURN also notes that PG&E failed to pay attention to guidance

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<sup>5</sup> Id; p. 52.

<sup>6</sup> Id; p. 53.

<sup>7</sup> Cal Advocates Comments; p. 11.

from Energy Safety’s 2022 Decision: *“In PG&E’s 2023 WMP, it must provide further analysis of its decision-making process, demonstrating a full evaluation of system hardening alternatives including considering combinations of system hardening initiatives. This is discussed further in Section 4.6.8.”*

In a recently received data request from SDG&E,<sup>9</sup> SDG&E states that such combination effects are currently being examined as an exercise between joint utilities, and that based on any new information utilities will recalculate their mitigation priorities. SDG&E explains the process thusly:

*“Once standardization is achieved, SDG&E will evaluate how to incorporate the results into the WiNGS planning model, adjust the proposed mitigations as appropriate, and provide forecast updates through the WMP annual plan(s). If a substantial shift in the capital plan were to occur, an off-cycle change order would be pursued.”<sup>10</sup>*

The “off-cycle” change process alluded to is described in the OEIS Change Order Guidelines.<sup>11</sup> An potential issue with this process is that it is the utilities that decide whether a Change Order process is necessary. *“If a change order is deemed necessary by SDG&E and approved by Energy Safety, any increase or reduction in costs associated with the change would be addressed through the two-way balancing process. Any overcollection would be returned to ratepayers. In the event of an undercollection, the Commission would review and approve cost recovery depending on the percentage of the undercollection versus the authorized revenue requirement (either advice letter, application, or other mechanism), as addressed at page JTW-19.”<sup>12</sup>*

So effectively, the utilities have sole discretion to return money to ratepayers if they find that mitigations other than undergrounding hit safety and cost targets more effectively. The OEIS and CPUC must oversee this process in order to prevent abuses:

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<sup>8</sup> OPENING COMMENTS OF THE UTILITY REFORM NETWORK ON PACIFIC GAS AND ELECTRIC COMPANY’S 2023-2025 WILDFIRE MITIGATION PLAN; Eric Borden; p. 10.

<sup>9</sup> Appendix 1.

<sup>10</sup> Appendix 1. DR Response MGRA-SDGE-009-02.

<sup>11</sup> OFFICE OF ENERGY INFRASTRUCTURE SAFETY’S REVISED 2022 CHANGE ORDER GUIDELINES FOR ELECTRICAL CORPORATIONS; November 2022. (Appendix B)

<sup>12</sup> Op. Cite; MGRA-SDGE-009-03.

- OEIS should require utilities that were ordered to compare undergrounding options against the combination of covered conductor and other options to prepare such comparisons as a Condition for approval of their 2023 WMPs.
- OEIS should require that if the planned mitigations based on these new portfolios are significantly different than the undergrounding-based plans utilities are currently using, utilities should be mandated to initiate a Change Order to reflect this change in current and planned spending as a condition for approval of their 2023 WMPs.
- The CPUC should not ratify a WMP that doesn't properly evaluate alternatives to undergrounding and have a mechanism for funding to be shifted back to ratepayers if alternatives better meeting safety and cost requirements are found.

## **APPENDIX 1 - MGRA DATA REQUESTS**

**Data Request Number:** MGRA-SDGE-009

**Proceeding Name:** A2205015\_016 - SoCalGas and SDGE 2024 GRC

**Publish To:** Mussey Grade Road Alliance

**Date Received:** 6/2/2023

**Date Responded:** 6/5/2023

1. Regarding Appendix B to SCG-03/SDG&E-03:

RSP/GSF-B-9	SDG&E believes this request is outside the scope of the GRC. The purpose of the GRC is to request and justify funds for programs the Company believes are the most appropriate to implement
RSP/GSF-B-16	The OEIS facilitated coordination between the utilities includes evaluating the effectiveness of covered conductor and alternatives to covered conductor. As part of this collaboration, SDG&E will work to identify multiplicative effects of additional mitigations in conjunction with covered conductor. However, data from this collaboration is not available in time to be used in SDG&E's TY 2024 GRC.
RSP/GSF-B-16	SDG&E has developed a portfolio of underground and overhead hardening programs that it believes is the most appropriate for this GRC forecast period

The first and second excerpts above appear to be in conflict, since on B-9 SDG&E rejected the request to do comparisons and on B-16 it says it is in the process of comparing.

If SDG&E could clarify how it will incorporate comparison of undergrounding and multiplicative effects of mitigation into its forecasts and revenue requests as this information becomes available that could eliminate the need for this cross.



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**SDG&E Response 1:**

SDG&E understands the conversation with OEIS is progressing, however the parties have not yet reached a consensus on methodology for incorporating multiplicative mitigations at varying effectiveness levels. Once standardization is achieved, SDG&E will evaluate how to incorporate the results into the WiNGS planning model, adjust the proposed mitigations as appropriate, and provide forecast updates through the WMP annual plan(s). If a substantial shift in the capital plan were to occur, an off-cycle change order would be pursued.

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2. Specifically, if adjustments are incorporated into the WiNGS-Planning model, and proposed mitigations are adjusted and published in the WMP annual plan, is that the same as the "capital plan" that is referred to, i.e. is the "capital plan" a component of the WMP annual plan? Assuming that a change in proposed mitigations occurred, would the decision whether this constitutes a "substantial" shift be left to SDG&E's judgement or would OEIS or the Commission have input as to whether an off-cycle change order should be pursued?

**SDG&E Response 2:**

Yes, the overall capital plan is a portion of our annual Wildfire Mitigation Plan. Energy Safety publishes guidelines that define what constitutes a Change Order. Please refer to the file titled MGRA-SDGE-009\_Q2\_Attachment.

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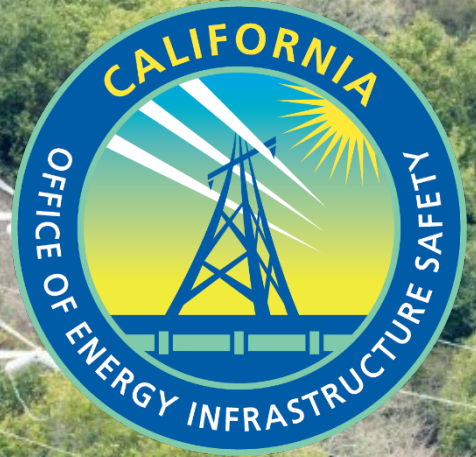
**Date Responded:** 6/5/2023

3. What MGRA understands from the attachment is that the Change Order process is to be initiated by the utility. The Change Order would be reviewed and approved or denied by Energy Safety. On the CPUC side, how would a change in projected revenue request be processed if the Change Order is approved?

**SDG&E Response 3:**

To provide the necessary flexibility to address wildfire mitigation costs in light of evolving data, priorities, and risk modeling approaches, SDG&E has proposed a two-way balancing account for wildfire mitigation activities. SDG&E's two-way balancing proposal is addressed in the testimony of Jonathan Woldemariam at Ex. SDG&E-13-2R at JTW-16-20. If a change order is deemed necessary by SDG&E and approved by Energy Safety, any increase or reduction in costs associated with the change would be addressed through the two-way balancing process. Any overcollection would be returned to ratepayers. In the event of an undercollection, the Commission would review and approve cost recovery depending on the percentage of the undercollection versus the authorized revenue requirement (either advice letter, application, or other mechanism), as addressed at page JTW-19.





**OFFICE OF ENERGY INFRASTRUCTURE SAFETY'S  
REVISED 2022 CHANGE ORDER  
GUIDELINES FOR ELECTRICAL  
CORPORATIONS**

November 2022

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# Executive Summary

The following guidelines outline the process for an electrical corporation to request Energy Safety's approval of significant changes related to its 2022 Wildfire Mitigation Plan Update mitigation initiatives.

Electrical corporations are required to request approval of changes to their mitigation initiatives if the changes substantially alter the course of their mitigation plan or potentially reduce asset or community protections from wildfire or Public Safety Power Shutoff (PSPS) risk. Specific criteria for change order requests are described in Section 2.

# 1. The Purpose of a Change Order

After approval of an electrical corporation's Wildfire Mitigation Plan (WMP) or Wildfire Mitigation Plan Update (Update), the electrical corporation may seek to change approved mitigations as it gains experience and measures its mitigation measure outcomes. To make this type of alteration to its WMP or Update based on an updated understanding of risk, an electrical corporation must submit a change order request.

Energy Safety evaluates change order requests to ensure that electrical corporations continue to follow a risk-based approach to mitigation of wildfire and PSPS risk. Energy Safety will issue a decision on each change order request as set forth in Section 4.

# 2. Criteria for a Change Order Request

An electrical corporation must request approval from Energy Safety if it is making any significant change to a mitigation initiative described in its 2022 Update as soon as practicable after the Update is approved and the electrical corporation determines a change is warranted. To be considered "significant" the change must meet the criteria set out in both A and B below.

## A. Type of Initiative

The proposed change is to a mitigation initiative in one or more of the following categories:

- Risk assessment and mapping
- Vegetation management and inspections
- Grid design and system hardening
- Grid operations
- Asset management and inspections
- Public Safety Power Shutoff (PSPS)

## B. Change in Risk

The change results in any of the following:

- An increase or decrease of more than 25% of an initiative's risk reduction value based on an updated understanding of risk
- The change represents a significant shift in either the strategic direction or purpose of an initiative (e.g., introducing a novel risk model that significantly alters the risk profile of the electrical corporation's circuits)

If an electrical corporation is unsure whether a proposed change meets these criteria, it is encouraged to submit an advance inquiry to Energy Safety on the matter via email at [safetypolicy@energysafety.ca.gov](mailto:safetypolicy@energysafety.ca.gov).

Electrical corporations should not request approval for a change in approach or targets because full implementation may not be feasible. Similarly, electrical corporations should not request modification of an approach or target because the electrical corporation expects to exceed its targets. Energy Safety will evaluate an electrical corporation's failure to meet a target (or its overshoot of a target) from the approved WMP or Update as part of Energy Safety's compliance program. Electrical corporations should include details about their progress against their targets in their Quarterly Initiative Updates.<sup>1</sup>

Electrical corporations should also not request approval for a fundamental change in strategy, as such a change may be too substantive for the change order process.

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<sup>1</sup> Quarterly Initiative Update dockets are filed according to year (e.g., "2022-QIU") here: <https://efiling.energysafety.ca.gov/Dockets.aspx?caseId=1252> (accessed Aug. 8, 2022).



## 3. Submission of Change Order Requests & Stakeholder Comments

Electrical corporations should endeavor to submit change order requests as soon as practicable after the electrical corporation determines a change is warranted. Multiple submissions are permissible. However, electrical corporations must submit change order requests related to their 2022 Updates by 5:00 p.m. on November 1, 2022, or within 10 days of Energy Safety's approval of their 2022 Update, if the approval is issued after November 1, 2022.<sup>2</sup>

Change order requests must be submitted to Energy Safety's e-filing system in the 2022 Wildfire Mitigation Plans docket (#2022-WMPs).<sup>3</sup> Electrical corporations must concurrently send all change order requests to the Department of Forestry and Fire Protection at CALFIREUtilityFireMitigationUnit@fire.ca.gov. Change order requests should be titled "name of electrical corporation\_the number of the change order request\_the date the change order request is submitted," for example, "PGE\_change order request01\_06302022."

### 3.1 Requirements for Change Order Requests

Requests for changes that meet the criteria described in Section 2 must include the following:

- A. A brief description of the proposed change including:
  1. The title of the initiative for which the proposed change request is being submitted
  2. The page number(s) in the 2022 Update where that initiative is described
  3. Whether the proposed change is a change to an approach, a target, or both
- B. The planned expenditure for that initiative according to the 2022 Update including:
  1. The percent of planned expenditure already spent
  2. The planned expenditure for the remainder of the current WMP cycle (prior to the 2023 WMP)

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<sup>2</sup> For documents submitted after 5:00 p.m. on a business day or any time on a Saturday, Sunday, or holiday, Energy Safety will consider the date of submission to be the next business day.

<sup>3</sup> Submit change order requests to the 2022-WMPs docket via the Energy Safety e-filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs> (accessed June 21, 2022).

3. If the expenditure amount is being redeployed, the amount being redeployed
  - i. From what budget
  - ii. To what budget
- C. The type of change proposed; changes may include: increase in scale, decrease in scale, change in prioritization, change in timing, or change in the nature of the work.
- D. Description of the expected outcome from the change within the current WMP cycle, including any reduction to:
  1. Wildfire risk (including ignition and consequence risk)
  2. PSPS risk

## 3.2 Stakeholder Comments

Stakeholders may comment on change order requests within 20 days of the date the electrical corporation submits a change order request to Energy Safety's 2022-WMPs docket.<sup>4,5</sup> The three-day deadline for discovery during the WMP or Update review period also applies during stakeholder review of change order requests.

Stakeholder comments must be submitted to Energy Safety's 2022-WMPs docket.<sup>6</sup> Stakeholder comments should be titled "<Commenter name> Comments on < file name of the change order request>."

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<sup>4</sup> Dates falling on a Saturday, Sunday or holiday as defined in Government Code Section 6700 have been adjusted to the next business day in accordance with Government Code Section 6707.

<sup>5</sup> Submit comments to the 2022-WMPs docket via the Energy Safety e-filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs> (accessed June 21, 2022).

<sup>6</sup> Submit comments to the 2022-WMPs docket via the Energy Safety e-filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs> (accessed June 21, 2022).

## 4. Change Order Evaluation

Energy Safety will evaluate change order requests and approve or deny the request based on the criteria in Table 1 below. Electrical corporations are encouraged to contact Energy Safety as set forth in Section 2 to receive technical assistance regarding change order requests.

**Table 1**

Decision	Rationale	Impact
<b>Approved</b>	Proposed change responds to updated understanding of risk and is likely to reduce wildfire or PSPS risk.	Electrical corporation must reflect change in all subsequent reports or WMP/Update submissions to Energy Safety.
<b>Rejected</b>	Proposed change is not likely to reduce wildfire or PSPS risk over existing approved initiative;  OR  Proposed change does not respond to updated risk assessment and/or only responds to underperformance or overperformance for reasons unrelated to the risk assessment;  OR  Proposed change is too substantive for the change order process.	Targets/approaches remain the same as proposed in the approved WMP/Update.

Electrical corporations must not include updated targets or approaches in any filing to Energy Safety, including Quarterly Data Reports, until the change is approved. Upon approval, the electrical corporation may amend any previous filings via submission of an amended filing to the relevant service list.

# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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