

**PUBLIC UTILITIES COMMISSION**

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**Via Electronic Filing**

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**Subject: Comments of the Public Advocates Office on Wildfire Mitigation Plan  
Quarterly Data Reports for Q2 2021  
Docket #2021-WMPs**

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments on the Q2 2021 Quarterly Report filing of Pacific Gas and Electric Company (PG&E) contained in the Quarterly Advice Letter (QAL),<sup>1</sup> the Quarterly Initiative Update (QIU), and the Quarterly Data Report (QDR) filed on August 2, 2021. We respectfully urge the Office of Energy Infrastructure Safety (Energy Safety)<sup>2</sup> to adopt the recommendations discussed herein. As identified in our comments, PG&E's delays in meeting the safety measures designed to reduce risk to its customers and the public are concerning, particularly the significant delays in the replacement of expulsion fuses (only 21% replaced) and PG&E's analysis

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<sup>1</sup> *Pacific Gas and Electric Company's Quarterly Advice Letter Pursuant to the Office of Energy Infrastructure Safety's Compliance Operational Protocols and Assembly Bill 1054 Regarding the Implementation of Its Approved Wildfire Mitigation Plan and Its Safety Recommendations (AL 6280-E), August 2, 2021.*

<sup>2</sup> On July 1, 2021, the Wildfire Safety Division of the California Public Utilities Commission moved to the California Natural Resources Agency and became the Office of Energy Infrastructure Safety pursuant to Assembly Bill 111, which was signed by the Governor on July 12, 2019 (Chapter 81, Statutes of 2019). For clarity, these comments use "Energy Safety" exclusively to refer to the Office of Energy Infrastructure Safety.

of pole loading (just over half of 1% of PG&E's pole target). In case these delays continue and PG&E fails to execute this work, Energy Safety should develop a proposal to establish how it will hold PG&E's officers accountable for this failure. This proposal should be subject to a public comment and reply process by interested stakeholders.

Cal Advocates has reviewed the Quarterly Report filings for Southern California Edison Company, San Diego Gas & Electric Company, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp. While these other utilities also reported falling behind in completing some initiatives on schedule, subject to ongoing discovery, Cal Advocates does not have immediate concerns with their Wildfire Mitigation Plan (WMP) implementation and does not make any recommendation regarding these utilities at this time.

## **I. INTRODUCTION**

Pursuant to the guidance in Energy Safety's July 17, 2020 *Guidance on the Remedial Compliance Plan & Quarterly Report Process Set Forth in Resolution WSD-002* and the February 16, 2021 *Compliance Operational Protocols*, Cal Advocates files the following comments.

## **II. RECOMMENDATIONS**

Upon review of PG&E's August 2, 2021 quarterly report filing, Cal Advocates recommends:

- Energy Safety should require PG&E, in its third quarter update for 2021, to provide detailed plans for how it expects to complete all of its 2021 WMP targets and commitments by the end of 2021.
- Energy Safety should look into PG&E's high number of reported contractor fatalities. Energy Safety should require PG&E to address the cause of the reported fatalities in its 2022 WMP and demonstrate that it has taken steps to address deficiencies in its worker safety programs and protocols.

### III. COMMENTS

#### A. Issues Identified in PG&E's Quarterly Report filing.

##### 1. PG&E's delays and lack of progress on a number of wildfire safety activities is concerning.

In PG&E's quarterly Advice Letter (AL) 6280-E, the utility indicates it is behind schedule in completing nine out of 53 commitments listed in its 2021 WMP.<sup>3</sup> PG&E is also behind schedule in completing the following initiatives:

- C.08 Distribution line legacy 4C Controllers,<sup>4</sup>
- C.11 Expulsion Fuse Replacement,<sup>5</sup>
- I.02 Trained Workforce for Service Restoration,<sup>6</sup>
- C.02 Generation for PSPS Mitigation (Temporary Distribution Microgrids),<sup>7</sup>
- C.06 Distribution Sectionalizing (automated devices),<sup>8</sup>
- C.07 Transmission Switches,<sup>9</sup>
- C.13 System Hardening (Line Miles),<sup>10</sup> and
- D.03 Transmission HFTD Inspections (structures).<sup>11</sup>

While PG&E's second quarter filings demonstrate that PG&E has addressed many of the delays reported in its first quarterly report,<sup>12</sup> the overall higher number of tardies in

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<sup>3</sup> *Pacific Gas and Electric Company's Quarterly Advice Letter Pursuant to the Office of Energy Infrastructure Safety's Compliance Operational Protocols and Assembly Bill 1054 Regarding the Implementation of Its Approved Wildfire Mitigation Plan and Its Safety Recommendations* (AL 6280-E), August 2, 2021, p. 3.

<sup>4</sup> Per AL 6280-E, August 2, 2021, p. 5, PG&E has replaced 31 units, short of its Q2 target of 80.

<sup>5</sup> Per AL 6280-E, August 2, 2021, p. 5, PG&E has replaced 96 units, short of its Q3 target of 450.

<sup>6</sup> Per AL 6280-E, August 2, 2021, p. 6, PG&E will be unable to enroll all necessary staff in G197 (Integrating Access and Functional Needs) training by September 1, 2021.

<sup>7</sup> Per AL 6280-E, August 2, 2021, p. 4, PG&E has developed 4 units, short of its Q2 target of 5.

<sup>8</sup> Per AL 6280-E, August 2, 2021, p. 4, PG&E has installed 157 units, short of its Q2 target of 158.

<sup>9</sup> Per AL 6280-E, August 2, 2021, p. 4, PG&E has installed 19 units, short of its Q2 target of 22.

<sup>10</sup> Per AL 6280-E, August 2, 2021, p. 5, PG&E has hardened 71 miles, short of its Q2 target of 72.

<sup>11</sup> Per AL 6280-E, August 2, 2021, p. 5, PG&E has fully inspected 20,159 structures, short of its Q2 target of 22,590.

<sup>12</sup> Of the six behind schedule commitments at the end of Q1 reported in AL 6182-E, PG&E indicates it is no longer behind schedule on three of the commitments at the end of Q2 in AL 6280-E. These three commitments are "D.01 Distribution HFTD Inspections," "D.02 Substation HFTD Inspections," and

completion of commitments at the end of Q2 indicates that PG&E may have difficulty meeting its 2021 WMP targets in the second half of 2021, during a fire season that is projected to have above normal significant fire potential.<sup>13</sup>

Energy Safety should require PG&E to provide a supplement to its second 2021 quarterly report filings within 15 days that provides detailed plans for how it expects to meet all of its 2021 WMP targets and commitments by the end of the year which Energy Safety can hold PG&E accountable to if they are not met. Also, given the previous identification of PG&E's failure to provide detailed workplans, Energy Safety should initiate public workshops to identify appropriate penalties for PG&E's officers should they ultimately fail to address the safety initiatives PG&E has committed to as part of its 2021 WMP.

**a) PG&E is significantly behind in its commitment to install reclosers.**

At the end of Q2, PG&E had installed no reclosers under the "C.09 Fuse Savers (Single Phase Reclosers)" initiative. This falls short of even its meager Q2 target of installing one recloser. Going forward, PG&E states that it expects to "achieve the end of year commitment with all 70 targeted units (plus some buffer units) **designed and either ready for construction or pending permits.**"<sup>14</sup> However, the commitment in PG&E's 2021 WMP, which is now proposed for adoption, states that PG&E will "**Install** 70 sets of single phase reclosers" in 2021.<sup>15</sup> PG&E's choice of language in describing its intended work is concerning and indicative of PG&E's habit of backtracking on important safety work. Designing projects but not committing to installation does not improve safety.

**b) PG&E is significantly behind in its commitment to replace expulsion fuses.**

At the end of Q2, PG&E had replaced 96 fuses under the "C.11 Expulsion Fuse Replacement" Initiative. At approximately 21 percent, this is far short of PG&E's Q2 target of 450 fuses.<sup>16</sup> PG&E does not describe a detailed plan to ensure completion of

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"E.01 EVM (line miles)."

<sup>13</sup> "Most mountains and foothills in California are forecast to have above normal fire potential through September with areas prone to offshore winds likely to retain above normal potential into October and November in southern California." *National Significant Wildland Fire Potential Outlook*, Predictive Services, National Interagency Fire Center, August 1, 2021. Available at [https://www.predictiveservices.nifc.gov/outlooks/monthly\\_seasonal\\_outlook.pdf](https://www.predictiveservices.nifc.gov/outlooks/monthly_seasonal_outlook.pdf)

<sup>14</sup> AL 6280-E, August 2, 2021, p. 5 (emphasis added).

<sup>15</sup> PG&E's 2021 Revised WMP, June 3, 2021, p. 322 (emphasis added).

<sup>16</sup> Per AL 6280-E, August 2, 2021, p. 5, PG&E commits to replacing 1,200 fuses by December 31, 2021. Its Q2 target was 450. The number of fuses actually replaced through Q2 was 96.

these initiatives by the end of the year, stating only that it “anticipate[s] meeting the full year target of 1,200 units by year end.”<sup>17</sup>

PG&E’s slow progress on this initiative suggests that PG&E is not effectively prioritizing replacement of potentially hazardous equipment in its HFTDs. Furthermore, Cal Advocates previously commented on PG&E’s 2021 WMP at the end of the first quarter on PG&E’s lack of a detailed workplan for where to replace non-exempt fuses, expressing concern that PG&E was not effectively targeting fuse replacements to maximize wildfire risk reduction.<sup>18</sup> Given that PG&E was on notice during the second quarter of this shortcoming but did not address this during the second quarter is concerning and is a further example that PG&E is not effectively prioritizing this initiative.

**c) PG&E is significantly behind in its pole loading infrastructure hardening and replacement program.**

In addition to the commitments described in PG&E’s Quarterly Advice Letter, PG&E’s second Quarterly Initiative Update lists progress on 142 initiatives, of which 37 have a quantitative annual target.<sup>19</sup> Of these 37 initiatives with quantitative targets, more than 33 percent fall short of PG&E’s stated second quarter targets.<sup>20</sup>

One such initiative is the “Pole loading infrastructure hardening and replacement program based on pole loading assessment program.” Under this initiative, PG&E has analyzed 292 poles for pole loading. At about 0.7 percent, this is far short of its Q2 target of 45,000 poles.<sup>21</sup> The Quarterly Initiative Update does not provide a cogent plan to ensure completion of this initiatives by the end of the year, stating only “production volumes are expected to ramp up drastically in Q3.”<sup>22</sup>

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<sup>17</sup> AL 6280-E, August 2, 2021, p. 5.

<sup>18</sup> *Comments of the Public Advocates Office on the 2021 Wildfire Mitigation Plan Update of Pacific Gas and Electric Company*, March 29, 2021, pp. 36-37.

<sup>19</sup> PG&E’s Q2 QIU, filtering for rows that contain a value in the column “AnnualQualTarget.”

<sup>20</sup> PG&E’s Q2 QIU, comparing the columns “ProjectedQuantProgressQ1-2” and “QuantActualProgressQ1-2.”

<sup>21</sup> PG&E’s Q2 QIU, “Initiatives” tab, row 61.

<sup>22</sup> PG&E’s Q2 QIU, “Initiatives” tab, row 61.

**2. Higher numbers of contractor fatalities occurred in 2021 to date than 2020 and 2019 combined.**

In PG&E's non-spatial data, Table 4, PG&E reports that it has experienced three contractor fatalities to date in 2021 related to WMP activities.<sup>23</sup> In contrast, PG&E reported only a single contractor fatality each year in both 2019 and 2020.

In Cal Advocates' comments on PG&E's 2021 WMP, we noted that PG&E had reported a high number of injuries associated with WMP activities.<sup>24</sup> In March 2021, PG&E provided Cal Advocates with a list of process improvements, procedure updates, and other measures it had implemented to reduce the number of worker injuries and fatalities associated with certain wildfire mitigation activities.<sup>25</sup> However, halfway through 2021, PG&E has already reported more contractor fatalities than in the past two years combined. It is unclear whether this increase is commensurate with increased contractor workload in 2021 compared to prior years, or if PG&E's previously stated safety improvements have proven insufficient to protect contract workers performing critical work for the utility.

Energy Safety should investigate PG&E's high number of reported fatalities and require PG&E to address the causes of the fatalities reported, in its 2022 WMP update and demonstrate that it has taken steps to develop significant improvements to its worker safety programs and protocols.

**IV. CONCLUSION**

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed herein. Please contact Nathaniel Skinner ([Nathaniel.Skinner@cpuc.ca.gov](mailto:Nathaniel.Skinner@cpuc.ca.gov)) or Matthew Karle ([Matthew.Karle@cpuc.ca.gov](mailto:Matthew.Karle@cpuc.ca.gov)) with any questions relating to these comments.

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<sup>23</sup> PG&E's Q2 Quarterly Data Report, Table 4 reports contractor fatalities associated with vegetation management, utility inspection, and "other."

<sup>24</sup> *Comments of the Public Advocates Office on the 2021 Wildfire Mitigation Plan Update of Pacific Gas and Electric Company*, March 29, 2021, pp. 32-35.

<sup>25</sup> PG&E's response to Data Request CalAdvocates-PGE-2021WMP-17, Question 5, March 17, 2021.

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