

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
OF THE STATE OF CALIFORNIA**

2023 to 2025 Electrical Corporation Wildfire
Mitigation Plans.

Docket #2023-2025-WMPs

**OPENING COMMENTS OF MARIN CLEAN ENERGY, SONOMA CLEAN
POWER AUTHORITY, PIONEER COMMUNITY ENERGY, AND EAST BAY
COMMUNITY ENERGY ON PG&E'S 2023 WILDFIRE MITIGATION PLAN
REVISION NOTICE RESPONSE**

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For: Marin Clean Energy
Sonoma Clean Power Authority
Pioneer Community Energy
East Bay Community Energy

August 22, 2023

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AUTHORITY, PIONEER COMMUNITY ENERGY, AND EAST BAY COMMUNITY
ENERGY ON PG&E’S 2023 WILDFIRE MITIGATION PLAN REVISION NOTICE
RESPONSE**

Marin Clean Energy, Sonoma Clean Power Authority, Pioneer Community Energy, and East Bay Community Energy (together, the “Joint CCAs”) respectfully submit the following comments on Pacific Gas and Electric Company’s (“PG&E”) *2023 Wildfire Mitigation Plan – Final Revision Notice Response* (the “Response”), provided by PG&E on August 7, 2023 in response to the Office of Energy Infrastructure Safety’s (“OEIS”) June 22, 2023 *Revision Notice for PG&E’s 2023-2025 Wildfire Mitigation Plan* (the “Notice”).

I. COMMENTS

- i. Comments on PG&E Response to RN-PG&E-23-03 – Resource Allocation to Address EPSS Risk and Wildfire Risk*

The Joint CCAs believe that reducing wildfire risk should be the top priority for vegetation management and other ignition-reduction measures, such as Enhanced Powerline Safety Settings (EPSS). The Notice identifies a troubling disconnect between the PG&E Circuit Protection Zones (“CPZs”) that have experienced the most EPSS outages (and thus are considered the CPZs that have the highest EPSS risk) and the PG&E CPZs that have the highest wildfire risk. “Only three out of the 21 highest EPSS risk CPZs identified by PG&E fall within the top 20 percent of highest wildfire risk CPZs.” The Joint CCAs support OEIS seeking an

explanation from PG&E justifying its proposal to rededicate significant resources away from reducing wildfire risk to increased vegetation management and equipment repairs on high EPSS circuits.

The Joint CCAs have three significant concerns regarding both PG&E’s response to RN-PG&E-23-03 and, more broadly, the disconnect between EPSS outage risk and wildfire risk on PG&E circuits. First, the difference between areas that are highly impacted by EPSS and those that have higher wildfire risk may indicate that EPSS is not well tailored to wildfire risk. The Joint CCAs are hopeful that appropriate oversight of the EPSS program will improve this alignment over time.

Second, PG&E’s Response fails to provide the “analysis demonstrating PG&E’s understanding of safety impacts due to EPSS” requested by OEIS. PG&E’s does not provide any specific analysis or quantification of the safety impacts of EPSS outages. Instead, PG&E provides only the broad statement that “PG&E recognizes that any interruption to our customers’ service is impactful.” OEIS should find PG&E non-responsive and order it to *publicly* provide a detailed analysis of EPSS safety impacts.

Third, PG&E mischaracterizes the overall impact of EPSS outages with the misleading claim that “in 2022 *most* customers protected by EPSS experienced service reliability *consistent with* systemwide performance.”¹ The safety impacts of PG&E’s EPSS outages in 2022 were massive. In 2022, over 770,000 PG&E customers experienced EPSS outages. Many of these customers experienced multiple outages – PG&E reports a total of 2,083,000 customer-outages in 2022, an average of over 2.7 outages per EPSS-impacted customer. These significant impacts

¹ At 40-41.

are continuing in 2023 – in July 2023 alone over 323,000 unique customers experienced a total of over 476,000 EPSS outages.

The Joint CCAs and other parties have repeatedly highlighted some of the impacts caused by EPSS. On July 12, 2022 the Joint CCAs and the Rural County Representatives of California (“RCRC”) together filed a Motion in the CPUC’s De-Energization Rulemaking (R.18-12-005) that provided a partial list of the health and safety impacts of EPSS outages and provided several real-world examples of these impacts.² On March 17, 2023 the Joint CCAs and RCRC presented on these impacts at a CPUC workshop on Fast-Trip, describing significant health and safety impacts in a range of counties and communities.³ The Joint CCAs provided further discussion of these impacts in their comments on PG&E’s Wildfire Mitigation Plan, submitted to OEIS on May 26, 2023.

OEIS should disregard PG&E’s attempts to minimize the significant safety impacts of EPSS outages by only looking to the average customer, instead of the specific communities that are more impacted by the EPSS program. OEIS should also direct PG&E to study and report on the safety impacts of EPSS on customers that face repeated sustained outages.

Given PG&E’s significant pivot away from enhanced vegetation management to EPSS, OEIS’s oversight of PG&E’s wildfire mitigation plan and the measures within it will be aided by a better and ongoing understanding of the impacts of EPSS.

² Joint CCA/RCRC Motion available at: <https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=493762535>

³ Presentation available at: <https://www.cpuc.ca.gov/industries-and-topics/wildfires/protective-equipment-device-settings>

II. CONCLUSION

The Joint CCAs thank OEIS for the opportunity to submit these comments.

August 22, 2023

Respectfully submitted,

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