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Comments of Kevin Collins and Nancy Macy on behalf of the Utility Wildfire Prevention Task Force

Subject: Revision Notice of OEIS pertaining to PG&E 2023 to 2025 Wildfire Mitigation Plan Wildfire Mitigation Plan Updates

Docket #2023-2025-WMPs

As a long-time public advocates on matters of electrical utility safety, we appreciate the efforts of your office and staff and also the efforts of the CPUC's Public Advocate's Office. However both agencies are placed in impossible positions by legislative mandate and procedural constraint. OEIS has no authority beyond advising the Public Utilities Commission on whether or not to approve an IOU's Wildfire Mitigation Plan (WMP), when It is clear to us that no plan of PG&E's, no matter how defective, would be rejected by the Commission. The CPUC Public Advocates Office is also without independent authority to act. Despite this, both of your offices have pointed out critical defects in PG&E's 2023 to 2025 WMP that must be corrected.

In the service of public engagement, and with the intent to disseminate critical information, we offer these brief comments.

3.2 Grid Design, Operations, and Maintenance
3.2.1 RN-PG&E-23-04: PG&E does not demonstrate how it will address its growing backlog of asset repairs.

Excerpts from document:

page 9
(1) "PG&E continues to have a significant backlog of repairs, which has grown throughout 2022; with the backlog increasing by 41,869 distribution tags within the HFTD and HFRA in 2022.[37]"

(2) "Specifically, PG&E has postponed the completion of high ignition risk tags, it has fallen behind on its 2022 closure of tags in 2022 and 2023, continues to use Field Safety Reassessments (FSRs) to

extend tag completion deadlines, and does not account for future increases of tags from higher findings rates and additional inspections."

Apart from the many hazards posed by the continuing use of technically obsolete equipment, such as the 22,000 circuit miles of bare #6 wire detailed in the 2013 Liberty Consulting GRC report to the Commission; nothing should be more alarming than PG&E's continuing inability to maintain its grid, even to the minimal standards of the Commission. As someone who understands utility circuits, I frequently observe particularly dangerous conditions in PG&E's grid. Has Energy Safety ever considered the risk posed by unprotected "secondaries"? Even at 125 volts, these conductors can ignite wildfires and kill people through electrocution. House service entrance conduits are heavy grounded steel pipe specifically because the incoming wires to residential electric meters have no overload protection on the supply side.

Comments of the Public Advocate's Office on Pacific Gas and Electric Company's 2022 Risk Spend Accountability Report July 21, 2023.

"Based on its review, Cal Advocates identifies the following areas of concern:

- PG&E has a 120,000 pole replacement backlog that is not reported in PG&E's 2022 RSAR.
- PG&E has a backlog of 477,000 maintenance tags, of which 170,000 are in High Fire Threat Districts (HFTDs). PG&E does not report on this backlog in its 2022 RSAR.
- PG&E is significantly behind on critical electric safety and reliability work, including replacement of deteriorated overhead conductor and surge arrestors as well as underground equipment maintenance.

In the bewildering arcana of the CPUC/Commission, this report is still very clear and it reflects and amplifies the concerns of OEIS about PG&E's maintenance backlog. It's not necessary to elaborate further.

3.4 Public Safety Power Shutoff (PSPS)
3.4.1 RN-PG&E-23-08: PG&E's PSPS decision-making process does not accurately account for EPSS enabled circuits, which could potentially lead to more PSPS events than needed.

OEIS makes the following comment:

" However, in PSPS decision-making, the concern is not whether EPSS causes more outages, but that EPSS enabled circuits are not accurately captured in PG&E' methodology for determining whether a PSPS event is necessary, potentially leading to more or larger PSPS events than needed."

We disagree with the perspective demonstrated by this statement. The problem for residents of rural areas of PG&E's service territory is the huge number of unplanned EPSS power outages caused

by tripping reclosers responding to any debris or animal that contacts two phases of a circuit or one line (phase) and grounded pole equipment. With the use of advanced circuit protection and conductor insulation, fire ignition safety could be far less inconvenient. Additionally the use of more SCADA equipment would allow linemen to locate circuit faults that cause these trips far more quickly. This is the actual solution and not simply a Band-Aid placed upon an open wound. Anyone who has lived with EPSS will understand this issue far more thoroughly than do CA's urban residents who are not affected to near the extent of rural California.

Current Regulations for Circuit Design

The circuit design specifications and minimum standards contained in CPUC General Order 95 (GO 95) are preposterously obsolete and completely inadequate to provide public safety from wildfire ignitions in the present era of Global Warming impact on wildfire behavior. This leaves tort law liability exposure as California's de-facto mode of safety "regulation".

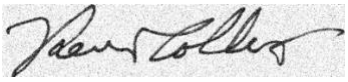
The term "fuse" or "fused" can be found only 5 times in the 604 pages of GO 95. In no place is a fuse actually required to be used. Table 1 allows the use of #8 and #6 AWG gauge bare single strand copper wire as primary distribution circuit conductor. As a former licensed General Building Contractor I was obligated to use #4 copper (much larger size wire) as the earth ground for one single family residential electrical service. The word "recloser" cannot be found in GO 95. Reclosers are by far, the most common circuit safety interrupter in use by US utilities. Far more advanced circuit safety devices are readily available on the international electrical engineering market.

Even more ridiculous is General Order 174 for power substations. It has one provision. The utility must inspect its own substations and send reports to the Commission. Apparently the imaginary notion of a "Regulatory Compact" continues to hold sway at the CPUC.

Conclusion

Once again, we appreciate the work of OEIS. But until major changes enter this arena of public policy, the current cycle of disaster and response will not be effectively addressed.

Regards,



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