

William B. Abrams
Sonoma County Resident/Ratepayer
625 McDonald Avenue
Santa Rosa, CA, 95404

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Gregg Morris, Executive Director
The Green Power Institute
2039 Shattuck Ave., Suite 402
Berkeley, CA, 94704

In support and actively engaged:
Pete Woiwode, Organizing Director
Reclaim Our Power Utility Justice Campaign
339 15th St #208, Oakland, CA, 94612

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
Sacramento, CA, 95814
efiling@energysafety.ca.gov

Subject: Response to the September 27, 2023 PG&E “2023-2025 Wildfire Mitigation Plan R3”

Docket: 2023-2025-WMPs

Attention Director Thomas Jacobs:

The undersigned parties that have actively engaged in the Wildfire Mitigation (“WMP”) Proceeding before the Office of Energy Infrastructure Safety of the California Natural Resource Agency (“Energy Safety” or “OEIS”) jointly file the following response:

Respectfully, parties request that Energy Safety consider the voluminous response provided by PG&E entitled “2023-2025 Wildfire Mitigation Plan R3” as nothing of import to substantively address the recommendations and valid concerns raised by intervenors within this proceeding. Moreover, this late filed supplement provides little time for substantive discussion and/or reply comments. Instead of engaging in good-faith with parties, PG&E has chosen to (1) evade the recommendations provided by intervenors, (2) avoid the concerns of ratepayers and (3) put forward an “R3” effort that attempts to flood Energy Safety and intervenors with superfluous information that does not substantively change the efficacy of their Wildfire Mitigation Plan or increase their accountability to regulators and ratepayers. Here are some examples of how PG&E has attempted to distract and distort within this “R3” iteration to circumvent accountability relative to their WMP:

1. **EVAM and TAT to ISA, VMOM, TRI, FTL, etc. adds Risk and reduces Accountability** – PG&E abandoned the Enhanced Vegetation Management Program (EVM) and the Tree Assessment Tool (TAT) because these established QA processes and QC instruments made it apparent to any clear-eyed observer that they were woefully failing at the standards set. Instead of stepping up to these self-identified and regulatorily monitored standards, PG&E has chosen to muddy the waters through

proposing incoherent QA processes, unspecified QC tools and qualitative generalities posing as QA attributes. Within this “R3” response PG&E has stated the following:

- *“Enhance record keeping practices for the Focused Tree Inspection program (FTI) by creating records of all potential strike trees inspected using a digitized Tree Risk Assessment form” will be “completed within 3 years”*
- *“Enhance the application for the Vegetation Management for Operational Mitigations (VMOM) - VMPI2 - and Tree Removal Inventory (TRI) - Field Maps - program to include capability to capture factors for prescribing trees for removal” will be “completed within 3 years.”¹*

As we can see, PG&E is taking the tried and true tactic of throwing out standards they fail to meet for revised promises of future standards in development. In this case, PG&E is disposing of existing vegetation management QA practices that highlight PG&E failures “3 years” before they have developed other quality standards and tools. If OEIS acquiesces to these tactics, rest assured PG&E will keep moving the goalposts until the standards are meaningless or so muddled as to render OEIS monitoring impossible and CPUC oversight illusory. Indeed, renaming and watering-down vegetation management programs and calling that progress is not a path forward that OEIS or ratepayers should support.

2. **PG&E Identified QA Practices and QC Standards are Inherently Fungible** – Throughout the “R3” document we can see PG&E’s attempt to minimize public scrutiny and regulatory oversight by offering misused statistical terms masquerading as specific QA standards. Of course, the PG&E provided language seems designed to inspire a “confidence level” but the vague language only seems to obfuscate the efficacy and relative efficiency of the proposed wildfire mitigation tactics. OEIS should consider the following example which is representative of many statements throughout the “R3” document that seem like quality standards at first glance but footnoted and caveated to render them meaningless for PG&E wildfire survivors and other Northern California residents:

**Audit locations are subject to change and dependent on completed execution work and constraints. The number of audit locations will be identified using a statistically valid approach with a 95% confidence level (CL) and 5% margin of error.”²*

Alternatively, PG&E might consider substituting this language with the following to the same effect:

*“*PG&E will accomplish a degree of wildfire mitigation in certain locations subject to change, internal as well as external constraints and depending on the yet identified number of audit locations. The amount of “completed execution work” and where it may or may not be completed is To-Be-Determined (TBD) leading to unknown Risk Spend Efficiency (RSE). Audit locations will be identified as valid with a very-very-high confidence level (CL) and some margin of error based on undefined assumptions, unrecognizable sampling practices and followed by an effective communications strategy.”*

Yes, throwing out a baseless “95% confidence level” and a “5% margin of error” may seem really specific to the uninformed but PG&E should not be so callous as to expect intervenors, OEIS or the CPUC to accept this meaningless rhetoric being passed off as quality standards. If this type of vagary across the PG&E WMP is left unchecked, residents across Northern California including past and future PG&E wildfire survivors should assume that they are less safe with a “95% confidence level.”

¹ See PG&E “2023-2025 Wildfire Mitigation Plan R3”, pg. 341 (WMP Section 8.2.1.1 Objectives pg. 596-603)

² See PG&E “2023-2025 Wildfire Mitigation Plan R3”, pg. 390, 392, 395-397, table 7-3-2, (WMP Section 8.1.1.2), table 8-3, pg. 439

3. **Inefficient Use of Labor** – PG&E’s approach highlighted within the “2023-2025 Wildfire Mitigation Plan R3” identifies and reiterates the retraining of Journeyman Lineman and other highly trained International Brotherhood of Electrical Workers (IBEW) to support their new underground-centric strategy. This approach does not satisfactorily contemplate or weigh the hiring of workers that may already be experts within the fields necessary to perform these new tasks in support of this new strategy. Homeowners might want to retrain an electrician to supervise excavation around their home but most likely they will hire an excavation contractor. Why does PG&E not provide OEIS with insight into these tradeoffs between hiring vs. training as they hold up Risk Spend Efficiency (RSE) as the basis of their decision-making? Certainly, under certain circumstances retraining a workforce is appropriate but ratepayers who will bear the brunt of these costs should be able to understand if they are paying more for PG&E’s labor relation preferences. Are IBEW workers more effective Foreman than those from the International Association of Fire Fighters (IAFF) or Communication Workers of America (CWA) or those from other unions? Inarguably, CWA Foreman or those from the Plumber and Steamfitter Unions across California might be ideal candidates to manage underground projects given their deep expertise. However, these unions and the skilled workers they represent seem noticeable absent or excluded from consideration in Table 8-10 without any consideration regarding the impact to RSE. The bifurcated roles of OEIS and the CPUC should not prevent OEIS from considering this type of RSE impact as they weigh this revised “R3” version of the PG&E WMP.
4. **PG&E Proposes Increased Short/Mid-Term Risks for Promises of Long-Term Risk Reduction** – Throughout the PG&E “R3” document PG&E conflates Risk Spend Efficiency (RSE) with measures of Risk Reduction (RR or RRR) and OEIS should be careful not to be duped by this slight-of-hand. Please, consider the following “R3” statement and compare it to their earlier responses:

“As PG&E’s risk models evolve, each circuit segment will be reassessed. PG&E will evaluate each circuit segment considering wildfire risk, reliability risk, and public safety based on the latest risk insights and project selection tools. Each of these circuit segments is protected by EPSS, is included in the PSPS protocol, and is addressed by routine asset inspection, maintenance, and vegetation management programs... For the remaining 13 percent of circuit segments in the portfolio, we selected undergrounding locations to maximize risk reduction for each dollar spent. PG&E determined that it would be more efficient to choose circuit segments based on the WFE score because undergrounding circuit segments with a lower feasibility score can be done more quickly with a lower cost.”³

This “*quickly with a lower cost*” is about RSE and not maximizing risk reduction which may be appropriate but without the comparative absolute or relative risk reduction (RR or RRR) measures across tactics, there is zero basis to understand the degree of increased wildfire risk our communities will face in the near/mid-term due to this conflation and obfuscation of RSE, RR and RRR. Consider this statement alongside their response to Mr. Abrams’ prior comments which stated “*Mr. Abrams claims PG&E is foregoing infrastructure safety improvements like covered conductor, or operational safeguards like quality controls and VM, while we ramp up undergrounding capabilities... Organizing system hardening projects based on risk order alone would result in less efficient—and ultimately more costly—risk mitigation.*” This statement belies the point and ignores the inherent tradeoffs between wildfire mitigation tactics with diverse and divergent risk reduction time periods. Yes, replacing C-hooks (mitigation for Camp Fire type ignitions), replacing Jumper cables (mitigation for Kincade Fire type ignitions) or increasing covered conductors (mitigation for Dixie Fire type of ignitions) one-year prior to undergrounding on the same line segment is without a doubt “*less efficient-and ultimately more costly*” and may rightly be avoided by PG&E. However, we must weigh these inefficiencies and costs with the short-term risks and increased public costs associated with catastrophic fires while we wait for

³ See PG&E “2023-2025 Wildfire Mitigation Plan R3”, pg. 415, 416

PG&E's longer-term risk reduction payback period? Again, these short-term and long-term tradeoffs are inherent and often a longer-term horizon for risk mitigation is appropriate. However, unless PG&E is transparent with these calculations, OEIS will be unable to balance PG&E's interests associated with a payback period from ratepayers and investor return with the relative risk reduction for those residents living among the PG&E lines.

In summary, due to the disingenuous PG&E "R3" filed response described above, the undersigned parties respectfully request that Energy Safety re-task PG&E to provide direct responses to the many recommendations and concerns raised by OEIS and intervenors relative to the efficacy of their WMP.

Respectfully submitted,



William B. Abrams
Sonoma County Resident
625 McDonald Ave.
Santa Rosa, CA, 95404
(707) 397-5727
Email: end2endconsulting@gmail.com

/s/ Pete Woiwode
Pete Woiwode
Organizing Director
Reclaim Our Power Justice Campaign
339 15th St #208, Oakland, CA, 94612
(734) 709-1789
Email: pete.energydemocracy@gmail.com



Gregg Morris
Executive Director
The Green Power Institute, *a program of the Pacific Institute*
A2039 Shattuck Ave., Suite 402
Berkeley, CA, 94704
(510) 644-2700
Email: gmmorris@emf.net