



October 13, 2023

**Via Electronic Filing**

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**Subject: Public Advocates Office Opening Comments on Pacific Gas and Electric's  
2023-2025 Wildfire Mitigation Plan Supplemental Response to Revision  
Notice**

**Docket: 2023-2025-WMPs**

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission respectfully submits the following comments on the 2023-2025 Wildfire Mitigation Plan Supplemental Response to Revision Notice of Pacific Gas and Electric Company. Please contact Nathaniel Skinner ([Nathaniel.Skinner@cpuc.ca.gov](mailto:Nathaniel.Skinner@cpuc.ca.gov)), Program Manager, or Henry Burton ([Henry.Burton@cpuc.ca.gov](mailto:Henry.Burton@cpuc.ca.gov)), Program and Project Supervisor, with any questions relating to these comments.

We respectfully urge the Office of Energy Infrastructure Safety to adopt the recommendations discussed herein.

Respectfully submitted,

/s/ **Marybelle Ang**

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## I. INTRODUCTION

Pursuant to the Office of Energy Infrastructure Safety’s (Energy Safety) September 13, 2023 response to Pacific Gas and Electric Company’s (PG&E) request to file a supplemental response to the Revision Notice,<sup>1</sup> the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these comments on PG&E’s *2023-2025 Wildfire Mitigation Plan R3* (2023-2025 WMP R3) and accompanying *2023-2025 Wildfire Mitigation Plan Supplemental Response to Revision Notice* (Supplemental Response).<sup>2</sup>

PG&E filed its *2023-2025 Wildfire Mitigation Plan* on March 27, 2023, with subsequent errata on April 6, 2023 and April 26, 2023 (Initial 2023-2025 WMP).<sup>3</sup> Cal Advocates filed comments on PG&E’s Initial 2023-2025 WMP on May 26, 2023.

On June 22, 2023, Energy Safety issued a Revision Notice to PG&E.<sup>4</sup> PG&E filed its Revision Notice Response and 2023-2025 WMP R2 on August 7, 2023.<sup>5</sup> On September 11, 2023, PG&E submitted a request to revise its WMP again and supplement its prior Revision Notice Response.<sup>6</sup> Energy Safety granted the request on September 13, 2023 and PG&E submitted its 2023-2025 WMP R3 and Supplemental Response on September 27, 2023.

Energy Safety permitted interested persons to file opening comments by October 13, 2023 and reply comments by October 20, 2023.<sup>7</sup> These comments address PG&E’s Supplemental Response and 2023-2025 WMP R3, focusing on the new or revised elements.

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<sup>1</sup> Energy Safety’s letter, subject line, *Pacific Gas and Electric Company’s Supplemental Response to Office of Energy Infrastructure Safety’s Revision Notice for Pacific Gas and Electric Company’s 2023-2025 Wildfire Mitigation Plan*, September 13, 2023.

<sup>2</sup> PG&E, *2023-2025 Wildfire Mitigation Plan R3*, September 27, 2023 (2023-2025 WMP R3); PG&E, *2023-2025 Wildfire Mitigation Plan Supplemental Response to Revision Notice*, September 27, 2023 (Supplemental Response).

<sup>3</sup> All references to “PG&E’s Initial 2023-2025 WMP” in these comments refer to the April 6, 2023 revision (2023\_04\_06\_PG&E\_2023\_2025WMP\_R0).

<sup>4</sup> Energy Safety, *Revision Notice for Pacific Gas and Electric Company’s 2023-2025 Wildfire Mitigation Plan*, June 22, 2023 (Revision Notice).

<sup>5</sup> PG&E, *2023-2025 Wildfire Mitigation Plan R2*, August 7, 2023 (2023-2025 WMP R2); PG&E, *2023-2025 Wildfire Mitigation Plan Response to Revision Notice*, August 7, 2023 (Revision Notice Response).

<sup>6</sup> PG&E’s request did not conform to the *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* published on December 6, 2022. The guidelines state (at page 7), “Energy Safety will not accept any updates or errata to the Revision Notice Response after the due date(s).”

<sup>7</sup> The original due dates of October 9 for opening comments and October 16 for reply comments were extended on October 6, 2023 in response to a request from The Utility Reform Network, Mussey Grade Road Alliance, and Cal Advocates. Energy Safety, *Revision to Comment Schedule for PG&E 2023-2025*

## II. DISCUSSION

### A. PG&E's Supplemental Response does not correct deficiencies in its prior Revision Notice Response.

Energy Safety's Revision Notice identified eight critical issues in PG&E's Initial 2023-2025 WMP.<sup>8</sup> Cal Advocates identified a number of PG&E's responses to these issues that were noncompliant with Energy Safety's directives.<sup>9</sup> PG&E's Supplemental Response does not address a number of Cal Advocates' concerns, and instead raises new concerns.

Energy Safety should take notice of PG&E's noncompliant and unreasonable responses and consider the issues previously raised by Cal Advocates, when Energy Safety issues a decision on PG&E's 2023-2025 WMP. Energy Safety should take particular note of the items in Table A below. To be clear, Table A is not an exhaustive list of the issues that remain unresolved, but rather a selection of some of the most serious issues. Energy Safety should not interpret this table to mean that all the other concerns that Cal Advocates raised in our previous comments have now been addressed.

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*WMP Supplemental Response to Revision Notice*, October 6, 2023, in docket 2023-2025-WMPs.

<sup>8</sup> Revision Notice at 2-3.

<sup>9</sup> *Public Advocates Office Opening Comments on Pacific Gas and Electric's Revised 2023-2025 Wildfire Mitigation Plan*, August 22, 2023 (Cal Advocates RNR Comments).

Table A  
**Key Issues from Cal Advocates’ Comments on  
 PG&E’s August 2023 Revision Notice Response**

Critical Issue	Cal Advocates’ prior comments	Additional notes
<b>RN-PG&amp;E-23-02</b>	PG&E failed to set target quality control (QC) pass rates for asset inspections. Instead, PG&E stated its intent to replace its QC process with a new program, which it did not describe in any meaningful detail. <sup>10</sup>	While PG&E has now set target pass rates, its targets are unreasonably low (discussed further in section II.B of these comments). PG&E also continues to be unable or unwilling to describe its proposed QC process in any detail. <sup>11</sup>
<b>RN-PG&amp;E-23-03</b>	PG&E failed to perform a meaningful analysis of the safety impacts of its enhanced powerline safety settings (EPSS) program. <sup>12</sup>	<p>PG&amp;E’s reply comments stated that it has not seen an increase in the number of outage events under EPSS.<sup>13</sup></p> <p>PG&amp;E’s assertion is misleading; even without an increase in outage events, PG&amp;E admits that EPSS outages often affect more customers than they would without EPSS, and as a result the “average customer” has experienced more frequent and longer outages under EPSS.<sup>14</sup> As PG&amp;E said in July 2023, “the reliability metrics were negatively affected as PG&amp;E implemented Enhanced Powerline Safety Settings (EPSS).”<sup>15</sup> This reduction in reliability may result in safety impacts to customers. PG&amp;E has yet to reasonably assess these potential safety impacts.</p>

<sup>10</sup> Cal Advocates RNR Comments at 2-6.

<sup>11</sup> In response to data request CalAdvocates-PGE-2023WMP-29, question 1, September 27, 2023, PG&E stated that it was unable to provide any internal documentation or procedures related to its proposed QC process, or even the approximate date by which PG&E plans to implement its proposed QC process.

<sup>12</sup> Cal Advocates RNR Comments at 6-8.

<sup>13</sup> *Reply Comments of Pacific Gas and Electric Company to the 2023-2025 Wildfire Mitigation Plan Revision Notice Responses*, September 1, 2023 at 2-3.

<sup>14</sup> *Reply Comments of Pacific Gas and Electric Company to the 2023-2025 Wildfire Mitigation Plan Revision Notice Responses*, September 1, 2023 at 2-3.

<sup>15</sup> PG&E 2022 Annual Electric Reliability Report (Per Decision 16-01-008), at 5.  
[https://www.pge.com/pge\\_global/common/pdfs/outages/planning-and-preparedness/safety-and-preparedness/grid-reliability/electric-reliability-reports/CPUC-2022-Annual-Electric-Reliability-Report.pdf](https://www.pge.com/pge_global/common/pdfs/outages/planning-and-preparedness/safety-and-preparedness/grid-reliability/electric-reliability-reports/CPUC-2022-Annual-Electric-Reliability-Report.pdf)

<p><b>RN-PG&amp;E-23-05</b></p>	<p>PG&amp;E continues to defer high-risk system hardening projects, which means that its system hardening program mitigates less risk and may lead to higher undergrounding costs in the future. PG&amp;E has also opted not to implement any system hardening measures at all on 79 high-risk circuit segments.<sup>16</sup></p>	<p>PG&amp;E argues that it is mitigating the risk of the 79 high-risk segments through its “Comprehensive Monitoring and Data Collection and Operational Mitigations,” and that it selected more efficient projects to underground in their stead.<sup>17</sup> However, PG&amp;E has still not provided an adequate explanation for why it is reasonable to leave these segments unhardened, despite planning to employ system hardening measures on numerous lower-risk segments.</p>
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**B. Energy Safety should require PG&E to set reasonable quality control targets (Critical Issue RN-PG&E-23-02).**

In its August 2023 Revision Notice Response, PG&E failed to set minimum quality control (QC) sample sizes and pass rates for its asset inspections. PG&E claims that doing so would hinder its flexibility as it transitions to a new and untested QC process.<sup>18</sup> As Cal Advocates points out, it is unreasonable for PG&E to change its process rather than commit to quantitative measurement and improvement of its inspection programs.<sup>19</sup> In its Supplemental Response, PG&E abandons this unreasonable claim; PG&E now provides target sample sizes and pass rates.<sup>20</sup> While these quantitative targets are an improvement over its previous failure to provide targets, PG&E’s new targets are unreasonably low by any measure.

PG&E sets its target QC pass rate for distribution asset inspections at 80 percent in 2023 and 88 percent in 2024.<sup>21</sup> These are objectively low targets.<sup>22</sup> A target pass rate of 80 percent

<sup>16</sup> Cal Advocates RNR Comments at 12-15.

<sup>17</sup> Supplemental Response at 73.

<sup>18</sup> August 2023 Revision Notice Response at 35.

<sup>19</sup> *Public Advocates Office Opening Comments on Pacific Gas and Electric’s Revised 2023-2025 Wildfire Mitigation Plan*, August 22, 2023 at 2-5.

<sup>20</sup> Table 8-7-2 (Revised), Supplemental Response at 36.

<sup>21</sup> Table 8-7-2 (Revised), Supplemental Response at 36.

<sup>22</sup> Indeed, PG&E’s 2023 target is well below PG&E’s actual year-to-date pass rates. See Table RN-PG&E-23-02-1, Supplemental Response at 37.

suggests that PG&E’s inspectors could miss a “critical attribute”<sup>23</sup> on one out of every five inspections and still achieve “acceptable” quality. PG&E plans to perform 234,648 detailed ground distribution inspections in 2023.<sup>24</sup> This means that even if an alarming 46,000 of these inspections failed to document a critical attribute that could lead to a potential ignition, PG&E’s inspection program would be successful by PG&E’s own standards. PG&E’s degree of tolerance for failure is unacceptable. In contrast, PG&E’s peer utility SCE set its target QC pass rate at 95 percent for 2023.<sup>25</sup> The latter is commensurate with the pass rate Energy Safety originally directed PG&E to target.<sup>26</sup>

PG&E’s 2023 target QC pass rates of 80 percent is a step backward from its recent actual performance.<sup>27</sup> In 2023 so far, PG&E has—to its credit—improved substantially, recording pass rates of 94.0 percent for desktop QC and 86.3 percent for field QC.<sup>28</sup> A target of 80 percent would not incentivize meaningful improvement over these numbers.<sup>29</sup>

In fact, if PG&E maintains its current performance, it would only need to implement marginal improvements to meet its target QC pass rate of 88 percent in 2024. Thus, contrary to PG&E’s own claims that pass rates should be set based on improved performance,<sup>30</sup> PG&E’s proposed target is barely above its existing pass rate.<sup>31</sup>

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<sup>23</sup> “A Critical Attribute is defined as: a condition that could lead to either an ignition point or wire down situation that could result in a potential fire ignition.” PG&E’s response to data request OEIS\_002, question 7, April 18, 2023.

<sup>24</sup> Revised Table 7-3-2, 2023-2025 WMP R3 at 336.

<sup>25</sup> Southern California Edison, *2023-2025 Wildfire Mitigation Plan*, March 27, 2023, Table 8-7 at 327.

<sup>26</sup> Energy Safety, *Final Decision on 2022 Wildfire Mitigation Plan Update Pacific Gas and Electric Company*, November 10, 2022 (Final Decision on PG&E’s Revised 2022 WMP), area for continued improvement PG&E-22-21 at 179.

<sup>27</sup> In 2022, PG&E’s distribution inspection QC pass rate was 85.5 percent for desktop QC and 79.3 percent for field QC. See Table 8-7-2 (Revised), Supplemental Response at 36.

<sup>28</sup> Table RN-PG&E-23-02-1, Supplemental Response at 37.

<sup>29</sup> In Table 8-7-2 (Revised), Supplemental Response at 36, PG&E notes that “Asset Inspection QC pass rates in 2022 were not specific to HFTD locations, while the 2023 – 2025 target pass rates and associated audit locations are specific to HFTD area.” PG&E fails to explain why it is reasonable *not* to aim for improved pass rates in the HFTDs, where an ignition could be catastrophic.

<sup>30</sup> “Pass rates should be set each year based on improved performance.” *Reply Comments of Pacific Gas and Electric Company to the 2023-2025 Wildfire Mitigation Plan*, June 6, 2023 at 3.

<sup>31</sup> PG&E’s target QC pass rate for distribution inspections is 88 percent in 2024, which is above its year-to-date field QC pass rate of 86.3 percent, but below its year-to-date desktop QC pass rate of 94 percent.

While Cal Advocates' discussion in these comments focuses on QC for distribution asset inspections, PG&E has set similarly lenient targets for its transmission inspection QC<sup>32</sup> and vegetation management (VM) QC.<sup>33</sup> PG&E's target rates across the board are unacceptable.

Cal Advocates appreciates Energy Safety's repeated directives to PG&E to target reasonable QC performance.<sup>34</sup> While PG&E's 2023 year-to-date pass rates show that its inspection programs may be trending in the right direction, PG&E's low targets demonstrate a lacking commitment to continued improvement. Energy Safety should direct PG&E to set QC targets for 2024 that meet Energy Safety's previous directive of 95 percent,<sup>35</sup> or at minimum, exceed PG&E's 2023 actual performance if below 95 percent. Such a change would require PG&E to meet the same targets as SCE and would be a good step towards PG&E continuously improving.

**C. Energy Safety should require PG&E to substantially improve its alternatives analysis for system hardening projects (Critical Issue RN-PG&E-23-05).**

PG&E's Initial 2023-2025 WMP failed to adequately evaluate alternatives to undergrounding and therefore did not comply with Energy Safety's decision on PG&E's 2022 WMP.<sup>36</sup> PG&E's August 2023 Revision Notice Response also lacks reasonable discussion of alternatives. In its September 27, 2023 Supplemental Response, PG&E provides a discussion of alternatives, which still falls short of Energy Safety's directive to "evaluate all alternatives to undergrounding, both as individual mitigations as well as combinations, focusing on addressing

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<sup>32</sup> Per Table 8-7-2 (Revised), Supplemental Response at 36, PG&E's 2023 target QC pass rate for transmission inspections is 90 percent. Per Table RN-PG&E-23-02-1, Supplemental Response at 37, PG&E's actual year-to-date performance is above 99 percent for both desktop and field QC.

<sup>33</sup> Per Table 8-18-2 (Revised), Supplemental Response at 40, PG&E's 2023 target pass rate for distribution VM QC is 80 percent and its target for transmission VM QC is 88 percent. Per Table RN-PG&E-23-02-2, Supplemental Response at 42, PG&E's actual year-to-date performance for distribution VM QC is 85 percent and its performance for transmission VM QC is 94 percent.

<sup>34</sup> Final Decision on PG&E's Revised 2022 WMP, area for continued improvement PG&E-22-21 at 179; Revision Notice at 7.

<sup>35</sup> Energy Safety, *Final Decision on 2022 Wildfire Mitigation Plan Update Pacific Gas and Electric Company*, November 10, 2022 (Final Decision on PG&E's Revised 2022 WMP), area for continued improvement PG&E-22-21 at 179.

<sup>36</sup> See discussion in *Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities*, May 26, 2023 at 9-12.



location-specific risks.”<sup>37</sup> PG&E’s filings also demonstrate that PG&E has deliberately opted to forgo alternative mitigations on 79 of its highest-risk circuit segments, choosing neither to underground them nor to replace them with covered conductor.<sup>38</sup>

PG&E states that it utilized its Economic Analysis Software Package (EASOP) tool to evaluate undergrounding projects that it had selected using version 2 of its Wildfire Distribution Risk Model (WDRM).<sup>39</sup> This tool compares overhead hardening, undergrounding, a hybrid approach that utilizes some of both, and as the null option, no hardening whatsoever.<sup>40</sup> The tool does not examine combinations of mitigations, such as covered conductor plus rapid earth fault current limiter technology or covered conductor plus fast-trip settings and enhanced vegetation management.<sup>41</sup> This, despite the fact that SCE has found such combinations of mitigations to be highly effective.<sup>42</sup>

For projects selected using version 3 of the WDRM, PG&E initially abandoned even the pretense of an alternatives analysis, unilaterally selecting undergrounding as its preferred mitigation.<sup>43</sup> PG&E later utilized a similar method to its EASOP to evaluate the benefit and cost of undergrounding and overhead hardening for these projects.<sup>44</sup> This analysis does not appear to consider a hybrid option.

While PG&E’s analyses appear to partially account for location-specific factors,<sup>45</sup> it uses outdated and unrealistic estimates for both the effectiveness and cost of mitigations. Table B

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<sup>37</sup> Final Decision on PG&E’s Revised 2022 WMP, Area for Continued Improvement PG&E-22-34 at 184.

<sup>38</sup> See discussion in *Public Advocates Office Opening Comments on Pacific Gas and Electric’s Revised 2023-2025 Wildfire Mitigation Plan*, August 22, 2023 at 14-15.

<sup>39</sup> Supplemental Response at 87. PG&E provided a copy of the EASOP model as Attachment 2023-09-27\_PGE\_23-05\_SRNR\_R0\_Atch02 (Supplemental Response Attachment 2).

<sup>40</sup> Supplemental Response at 87.

<sup>41</sup> Enhanced vegetation management and fast-trip settings can help mitigate the residual risk after a circuit-segment has been hardened with covered conductor. Both enhanced vegetation management and fast-trip settings reduce the probability of an ignition in the event that vegetation strikes or downs a covered conductor.

<sup>42</sup> See discussion in *Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities*, May 26, 2023 at 21-22.

<sup>43</sup> Supplemental Response at 91.

<sup>44</sup> Supplemental Response at 92. PG&E provided a copy of its analysis of WDRM v3 projects as Attachment 2023-09-27\_PGE\_23-05\_SRNR\_R0\_Atch03 (Supplemental Response Attachment 3).

<sup>45</sup> The “Risks” tab in Supplemental Response Attachment 2 allows an analyst to set, for example, location-specific modifiers for terrain, street easements, and other factors that could affect local costs.

shows that PG&E consistently uses unfavorable figures for covered conductor (underestimating the effectiveness and overestimating the cost) while doing the opposite for undergrounding.

Table B Comparison of Effectiveness and Cost Assumptions			
	WDRM v2 analysis <sup>46</sup>	WDRM v3 analysis <sup>47</sup>	Reasonable estimates
Covered conductor effectiveness	62 percent	62 percent	64 percent <sup>48</sup>
Covered conductor cost	\$1.0 million/mile	\$1.13 million/mile	\$0.83 million/mile <sup>49</sup>
Undergrounding effectiveness	99 percent	99 percent	97.7 percent <sup>50</sup>
Undergrounding cost	\$2.8 million/mile	\$3.0 million/mile	\$3.3 million/mile <sup>51</sup>

Table B shows that the values that PG&E uses for its alternatives analysis are generally skewed in favor of undergrounding (they assume higher effectiveness and lower cost than PG&E

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The “v3 Mitigation Alternatives” tab in Supplemental Response Attachment 3 includes project-specific “feasibility scores” which are used as cost multipliers for undergrounding.

<sup>46</sup> Supplemental Response Attachment 2. Effectiveness values are from the “Inputs” tab. Cost values are from the “Inputs” tab, assuming a single-mile project with no terrain modifiers.

<sup>47</sup> Supplemental Response Attachment 3. Effectiveness values are from calculations in the “v3 Mitigation Alternatives” tab, columns AE and AK. Cost values are from the “Cost\_Data” tab.

<sup>48</sup> Per PG&E’s Supplemental Response at 91, PG&E currently estimates that overhead hardening is 64 percent effective. Cal Advocates notes that even 64 percent may be an substantial underestimate of the effectiveness of covered conductor. See, e.g., *Mussey Grade Road Alliance Comments on 2023-2025 Wildfire Mitigation Plans R2 of PG&E and Revision Notice Response*, August 22, 2023 at 12.

<sup>49</sup> Per the Joint IOU Covered Conductor Working Group Report (Provided in PG&E’s Initial 2023-2025 WMP as 2023-03-27\_PGE\_2023\_WMP\_R0\_Appendix D ACI PG&E-22-11\_Atch01), Table 18 at 40, PG&E’s actual covered conductor unit costs in 2022 were \$0.83 million per mile.

<sup>50</sup> Per PG&E’s Supplemental Response at 91, PG&E currently estimates that undergrounding is 97.7 percent effective.

<sup>51</sup> Per PG&E’s response to data request CalAdvocates-PGE-2023WMP-09, April 7, 2023, question 12, PG&E forecasts undergrounding costs to be \$3.3 million per mile in 2023. Note: 2022 actuals are not used here because PG&E does not have a long history of undergrounding for wildfire prevention, so actual costs in 2022 are not necessarily predictive of future costs.

has reported elsewhere) and against covered conductor (they assume lower effectiveness and higher cost).

Despite this skew, PG&E’s initial cost-benefit assessment shows that, in most cases, overhead hardening is still the more efficient mitigation.<sup>52</sup> It was only after PG&E applied a “secondary filter” process that evaluates PSPS events, ingress and egress issues, and tree strike potential, that nearly 90 percent of projects shifted from overhead to underground, despite the generally poorer cost-benefit assessment of undergrounding.<sup>53</sup>

PG&E’s “secondary filter” process is not well justified. PG&E’s “secondary filter” process appears to be a way to support PG&E’s pre-determined conclusions without an adequate evidentiary basis. Under this process, if a project location sees eight or more PSPS events over a ten year period,<sup>54</sup> has a “Public Safety Specialist (PSS) Score” of 105 or greater, or if the area is evaluated as having tree strike potential, the location is most likely recommended for undergrounding.<sup>55</sup> PG&E does not explain whether it has evaluated other considerations that factor against undergrounding, such as the extent to which covered conductor can reduce the need for PSPS, how “PSS Scores” are generated, or why some locations are marked as having tree strike potential despite having no trees.<sup>56</sup> PG&E also admits that its considerations of ingress and egress issues are not specific to the project locations.<sup>57</sup>

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<sup>52</sup> Supplemental Response Attachment 3, tab “v3 Mitigation Alternatives” column AQ recommends overhead hardening based on cost-benefit determinations for 288 out of 330 projects listed.

<sup>53</sup> Supplemental Response Attachment 3, tab “v3 Mitigation Alternatives” column AQ recommends overhead hardening based on cost-benefit determinations for 288 projects. Of these 288 projects, column AZ recommends overhead hardening on only 30, following the “secondary filter” process.

<sup>54</sup> Cal Advocates assumes this refers to a 10-year forecast or lookback analysis.

<sup>55</sup> Per the equations in Supplemental Response Attachment 3, tab “v3 Mitigation Alternatives” columns AY and AZ. Only 13 locations meet one of more of the “secondary filter” thresholds but are still recommended for overhead hardening. This appears to be because overhead hardening is at least twice as efficient as undergrounding in these locations.

<sup>56</sup> Per Supplemental Response Attachment, tab “v3 Mitigation Alternatives,” columns AU and AX, of the 288 project locations recommended for overhead hardening based purely cost-benefit determinations, 68 (nearly a quarter) of those locations have a “Tree Strike Max Population” of 0, but a “Tree Strike UG Criteria T/F” as True.

<sup>57</sup> “In place of a PSS team member reviewing each of the 2023-2024 project sites selected by WDRM v3, PG&E is using the PSS score for each circuit and applying it to each segment on that circuit. If the PSS score for a circuit is high (score = 105), then the model considers there to be an ingress/egress risk on each of the segments that make up that circuit.” Supplemental Response at 92.

Finally, even when PG&E’s multiple filters determine that overhead hardening was in fact the most appropriate mitigation for three locations in 2024, PG&E opted to ignore its own analysis and propose undergrounding in those locations anyway.<sup>58</sup>

In sum, PG&E’s alternatives analysis uses inaccurate cost and effectiveness estimates, is opaque to outside analysis, and continues to fail to comply with Energy Safety’s directive to “evaluate *all* alternatives to undergrounding, both as individual mitigations *as well as combinations*.”<sup>59</sup> Even then, if the evaluation identifies a non-undergrounding option, PG&E ignores the evaluation. As noted above, the set of alternatives that PG&E analyzes excludes realistic combinations such as covered conductor combined with fast-trip settings and enhanced vegetation management.<sup>60</sup>

Energy Safety should require PG&E to provide full documentation of its analyses, including a rubric for determining the “PSS Score” of a location. Because PG&E has ignored Energy Safety’s directives, Energy Safety should require PG&E to perform a comprehensive alternatives analysis for all future undergrounding projects, rather than a mere comparison of overhead and undergrounding as standalone mitigations.

### III. CONCLUSION

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed herein.

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<sup>58</sup> Per Table SRN-PG&E-23-05-4 in PG&E’s Supplemental Response at 93, PG&E’s analysis recommended overhead hardening for 3 locations in 2024. Despite this, PG&E opted to keep these projects in its undergrounding plan rather than scoping them for more efficient and quicker mitigations.

<sup>59</sup> Final Decision on PG&E’s Revised 2022 WMP, Area for Continued Improvement PG&E-22-34 at 184 (emphasis added).

<sup>60</sup> As noted previously, SCE has found such combinations of mitigations to be highly effective. See discussion in *Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities*, May 26, 2023 at 21-22.

Respectfully submitted,

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