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December 4, 2023 VIA ELECTRONIC FILING

Shannon O'Rourke
Deputy Director
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RE: MUSSEY GRADE ROAD ALLIANCE COMMENTS ON OFFICE OF ENERGY SAFETY INFRASTRUCTURE DRAFT DECISIONS ON PACIFIC GAS AND ELECTRIC COMPANY'S 2023-2025 WILDFIRE MITIGATION PLAN

The Mussey Grade Road Alliance (MGRA or Alliance) files these comments pursuant to the Cover letter to the Stakeholders for Pacific Gas & Electric Company's (PG&E) 2023-2025 Wildfire Mitigation Plan[1] which authorizes stakeholders to file comments on PG&E's 2023-2025 Wildfire Mitigation Plan Draft Decisions by December 4th, 2023. The Alliance filed comments on the 2022 Wildfire Mitigation Plans of all major IOUs April 11, 2022,[2] and filed Reply Comments on April 18, 2022.[3]

This is the third and final Draft Decision issued by the Office of Energy Infrastructure Safety (OEIS or Energy Safety). The Alliance appreciates the work that the dedicated staff of the Office of Energy Infrastructure Safety (OEIS or Energy Safety) have performed in reviewing the thousands of pages of primary and supporting documentation that comprised these plans in an extremely compressed time frame, as well as reviewing input from stakeholders and incorporating it as appropriate. The Alliance particularly appreciates incorporation of its feedback on the earlier Draft Decisions, feedback that has informed the present Draft Decision as well and which greatly lightens the burden of our comments. Comments of the Alliance are intended to supplement areas in

[1] 2023-2025-WMPs; OFFICE OF ENERGY INFRASTRUCTURE SAFETY; DRAFT DECISION ON 2023-2025 WILDFIRE MITIGATION PLAN; PACIFIC GAS & ELECTRIC COMPANY; TN13374_20231113T132937_PGE's_2023_WMP_Draft_Decision_with_cover_letter; November 15, 2023. (PG&E Draft Decision or DD)
[2] 2023-2025-WMPs; MUSSEY GRADE ROAD ALLIANCE COMMENTS ON 2023-2025 WILDFIRE MITIGATION PLANS OF PG&E, SCE, AND SDG&E; May 26, 2023. (MGRA Comments)
[3] 2023-2025-WMPs; MUSSEY GRADE ROAD ALLIANCE REPLY COMMENTS ON 2023-2025 WILDFIRE MITIGATION PLANS OF PG&E, SCE, AND SDG&E; June 6, 2023. (MGRA Reply)

which the Draft Decisions did not fully capture or process the vast information available and are intended to help refine the final product.

The Alliance reply comments are authored by the Alliance expert, Joseph W. Mitchell, Ph.D.

Respectfully submitted this 4th day of December, 2022,

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COMMENTS ON THE OFFICE OF ENERGY SAFETY INFRASTRUCTURE DRAFT DECISION ON PACIFIC GAS AND ELECTRIC COMPANY'S 2023-2025 WMP WILDFIRE MITIGATION PLAN ON BEHALF OF THE MUSSEY GRADE ROAD ALLIANCE

The Mussey Grade Road Alliances' (MGRA or Alliance) comments are authored by MGRA's expert witness Joseph W. Mitchell, Ph.D.[4]

1. INTRODUCTION

MGRA supports Energy Safety's Draft Decision for Southern California Edison and San Diego Gas and Electric 2023-2025 Wildfire Mitigation Plans, and appreciates that OEIS recommends adopting MGRA suggestions in numerous areas.

MGRA also notes that although the scope of the "full" WMPs had expanded beyond anything encountered to data, with 2,000 pages alone from the Wildfire Mitigation Plans of the Big Three utilities, thousands of more pages of supplemental and GIS data, and many hundreds of data requests from not only OEIS but from stakeholders, the Energy Safety response itself has managed to be more terse and limited in scope than in past years. While some of this reduction may be the result of focus and practice, it appears leave fairly extensive swathes of the utility safety landscape only cursorily examined or ignored. It is in these areas that external stakeholders who might have specialized knowledge or expertise may be particularly helpful. Integrating this input in a correct manner improves regulation.

In its previous final decisions on the SCE and SDG&E Wildfire Mitigation Plans,[5] Energy Safety adopted considerable input from the comments of MGRA and other stakeholders, particularly with regard to the correct protocol for adopting intervenor contributions. This was very

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[4] M-bar Technologies and Consulting, LLC; http://www.mbartek.com; Email: jwmitchell@mbartek.com. Dr. Mitchell is also a board member of the Mussey Grade Road Alliance.

[5] OFFICE OF ENERGY INFRASTRUCTURE SAFETY DECISION ON 2023-2025 WILDFIRE MITIGATION PLAN; SAN DIEGO GAS & ELECTRIC COMPANY; October 2023. TN13189_20231013T141802_SDGE_20232025_WMP_Decision_and_Cover_Letter
OFFICE OF ENERGY INFRASTRUCTURE SAFETY DECISION ON 2023-2025 WILDFIRE MITIGATION PLAN; SOUTHERN CALIFORNIA ELECTRIC COMPANY; October 2023 TN13264_20231024T134139_SCE_20232025_WMP_Decision_and_Cover_Letter

much appreciated and these elements have been carried into the present Draft Decision. As a result, MGRA's comments restricted to technical issues.

2. TECHNICAL ISSUES

2.1. PG&E's WDRM v4 Model will Need Additional Scrutiny (Section 11.1)

By next year, PG&E will have released its WDRM v4 and it will have a number of modifications from its previous WDRM v2 and WDRM v3 models. However, the DD mentions WDRM v4 only once, stating that

"*PG&E provides more information on its Wildfire Feasibility Efficiency score (WFE) and states that using WFE helps prioritize based on feasibility to efficiently reduce risk.108 It also provides additional information on its Wildfire Benefit Cost Analysis (WBCA) that it plans to implement with its WDRM Version 4 (WDRM v4)*."[6]

PG&E has not fully adopted a statistical distribution for its consequence model, though it has made progress in this direction. As MGRA noted in its WMP Comments, "*PG&E's consequence model likely continues not to fully incorporate tail risk, though it would appear to do so better than models relying solely on an 8 hour Technosylva wildfire spread simulation. Instead of using mean values, PG&E may benefit from using a statistical model, in which large fires in its categories are fit to a distribution incorporating the known power law size dependencies of wildfire*."[7] MGRA also notes that "*WDRM v3 consequently still overpredicts ignitions from "agents" such as balloons, animals, and vehicles which historically have not been responsible for catastrophic wildfire ignition*."[8] It is important to note that these lead to biases in PG&E's modeling results and that any planned improvements need to be noted.

While Energy Safety has added a number of areas related to risk modeling for continuous improvement, the fundamental changes to its WDRM model do not seem to be included. MGRA recommends adding an additional area for continued improvement under Section 11:

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[6] DD; pp. 43-44.
[7] MGRA WMP Comments; p. 63.
[8] Id.; p. 64.

- The full technical details and results of third-party validation for PG&E's WDRM v4 model must be provided in its next WMP Update. This should include a full comparison of WDRM v4 risk, ignition probability, and consequence calculations at the circuit or segment level with the results of WDRM v2 and WDRM v3.
- PG&E should provide data showing that its analysis, when run simulating known historical fires, produces consistent results with historical data with regard to fire size and which drivers are responsible for catastrophic wildfires.
- PG&E should not use average category values for its consequence model but rather use a statistical model that captures tail risk such as a truncated Generalized Pareto distribution.

2.2. PG&E-23-07 Deployment of New Technologies (Section 11.3)[9]

MGRA does not believe the proposed remedy is prescriptive enough to result in substantially improved performance on the part of PG&E. As parties in PG&E's General Rate Case it is quite evident that PG&E's primary desired mitigation is undergrounding, and that undergrounding in many cases displaces new technologies or makes them moot. Undergrounding provides a much higher rate of return for the company than investment in these advanced technologies, so there is an inherent disincentive for their rapid and efficient development and deployment. Simply providing reports on these technologies will in no way accelerate development. Measures that Energy Safety might consider in addition for PG&E's 2025 update would be:

- Plan for maximum accelerated development and deployment of new technologies assuming adequate funding.
- Designation of specific targets for pilots and feasibility studies
- Explanation of and remediation plan for technologies that are lagging other major IOUs.

2.3. PG&E-23-26. Evaluation and Reporting of Safety Impacts Relating to EPSS (Section 11.7)[10]

In addition to examining the Safety Impacts associated with EPSS events, Energy Safety should require PG&E to provide additional information regarding the conditions under which the EPSS event was initiated. In MGRA's Comments, for instance, it was demonstrated that under

[9] PD; p. 104.
[10] PD; p. 117.

many conditions there were no significant meteorological drivers in the area where the EPSS event originated.[11] These included the very conservative criteria of wind gust greater than 15 mph, relative humidity less than 25%, and temperature greater than 25 C.

Therefore, PG&E should be requested to report out temperature, relative humidity, wind speed, and fuel moisture at the measuring stations closest to the EPSS point of origin. This will aid in setting more appropriate thresholds so that areas not directly at risk of catastrophic fire can be spared the disruption of unannounced shutoff.

3. ATTRIBUTION OF CONTRIBUTIONS

OEIS acknowledged and characterized many areas of MGRA contribution, which is appreciated.

3.1. Areas of Contribution

3.1.1. Extreme Wind Events

MGRA should be given credit for contribution in the area of "extreme winds".

MGRA entered comments that stated that:
"*Even if the utilities' most ambitious undergrounding plans roll forward, these are not going to cover the entire utility service area, nor will they cover secondary conductors. There will still be a substantial above-ground infrastructure exposed, and in the event of a worst feasible case event it should be assumed that the geographic extent of the event will extend beyond the normal boundaries of hardened areas and expose additional infrastructure*."[12]
The Proposed Resolution notes that:

"• *An exceedance of 1-in-30-year historical wind load conditions may lead to exposure of assets that are not located in the HFTD. Using PG&E's current wind load data, PG&E may be*

[11] MGRA Comments; p. 114.
[12] MGRA Comments; p. 78.

underestimating risks of ignition and high consequence and therefore not hardening these assets because it is not identified by WTRM-Planning as requiring such hardening.

• A database of past events, even 30 years in duration and supplemented with synthetic scenarios, may underestimate risk faced today or in the future. Climate change is intensifying the conditions that lead to catastrophic wildfire in California.

• Fragility curves provide inadequate granularity to support decision making.

In its next Base WMP, PG&E must report on its progress developing statistical estimates of wind events with a frequency of once in the maximum asset life for its system. PG&E must evaluate results from incorporating these into WTRM planning when developing its mitigation initiative portfolio or explain why the approach would not serve as an improvement to its mitigation strategy."[13]

It is up to OEIS to determine whether MGRA's contribution was substantial or coincidental.

4. CONCLUSION

MGRA is pleased to have been able to contribute to the review of the Wildfire Mitigation Plans and we urge the Office of Energy Infrastructure Safety to consider and incorporate the these additional comments.

Respectfully submitted this 4th day of December, 2023,

By: __*/S/*___ ***Joseph W. Mitchell, Ph.D.***_____

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Attachment A:
CPUC Docket R.20-07-013; TAIL RISK AND EVENT STATISTICS FOR UTILITY PLANNING; August 1, 2023. Joseph W. Mitchell, Ph.D.

[13] PD; p. 31.