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**Via Electronic Filing**

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**Subject: Public Advocates Office's Opening Comments on the Draft Decision Approving Pacific Gas and Electric Company's 2023-2025 Wildfire Mitigation Plan, Docket No. 2023-2025-WMPs**

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments on the Draft Decision of the Office of Energy Infrastructure Safety (Energy Safety) approving Pacific Gas and Electric Company's (PG&E) 2023-2025 Wildfire Mitigation Plan.

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,

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**TABLE OF CONTENTS**

|   | Page(s) |
|---|---------|
| I. INTRODUCTION .....   | 1       |
| II. GRID DESIGN, OPERATIONS, AND MAINTENANCE.....   | 2       |
| A. Energy Safety should require PG&E to revise its alternatives<br>analysis to address substantive concerns raised by intervenors<br>(Area for Continued Improvement PG&E-23-05). ....                                  | 2       |
| B. Energy Safety should require PG&E to provide detailed<br>workplans for implementation of new technologies, or justify<br>why it will not pursue new technologies (Area for Continued<br>Improvement PG&E-23-07)..... | 6       |
| III. CROSS-CATEGORY .....   | 8       |
| A. Energy Safety should require PG&E to fully analyze and justify<br>the safety impacts of its enhanced powerline safety settings<br>program (EPSS) (Area for Continued Improvement PG&E-23-<br>26). ....               | 8       |
| IV. CONCLUSION .....  | 9       |

## I. INTRODUCTION

On March 27, 2023, Pacific Gas and Electric Company (PG&E) filed its *2023-2025 Wildfire Mitigation Plan*, with subsequent errata on April 6, 2023 and April 26, 2023 (Initial 2023-2025 WMP). On May 26, 2023, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) and other stakeholders filed formal comments on the 2023-2025 WMPs of PG&E and other large utilities.<sup>1</sup>

On June 22, 2023, Energy Safety issued a Revision Notice to PG&E.<sup>2</sup> PG&E filed its Revision Notice Response and 2023-2025 WMP R2 on August 7, 2023.<sup>3</sup> On September 27, 2023, PG&E submitted its Supplemental Response and 2023-2025 WMP R3.<sup>4</sup>

On November 13, 2023, the Office of Energy Infrastructure Safety (Energy Safety) issued its *Draft Decision on 2023-2025 Wildfire Mitigation Plan of Pacific Gas and Electric Company* (Draft Decision).<sup>5</sup> The cover letter of the Draft Decision invites interested persons to file opening comments by December 4, 2023 and reply comments by December 14, 2023. Cal Advocates submits these comments on the Draft Decision pursuant to the *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (2023 WMP Process Guidelines) and the cover letter of the Draft Decision.<sup>6</sup> In these comments, Cal Advocates makes the following recommendations:

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<sup>1</sup> Cal Advocates, *Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities*, May 26, 2023 in docket 2023-2025-WMPs (Cal Advocates Comments on 2023-2025 WMPs).

<sup>2</sup> Energy Safety, *Revision Notice for Pacific Gas and Electric Company's 2023-2025 Wildfire Mitigation Plan*, June 22, 2023 (Revision Notice).

<sup>3</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>4</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>5</sup> Energy Safety, *Draft Decision on 2023-2025 Wildfire Mitigation Plan of Pacific Gas and Electric Company*, November 13, 2023 in docket 2023-2025-WMPs (Draft Decision).

<sup>6</sup> Energy Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022.

- Energy Safety should require PG&E to revise its alternatives analysis to address substantive concerns raised by intervenors (Area for Continued Improvement PG&E-23-05).
- Energy Safety should require PG&E to provide detailed workplans for implementation of new technologies, or justify why it will not pursue new technologies (Area for Continued Improvement PG&E-23-07).
- Energy Safety should require PG&E to fully analyze and justify the safety impacts of its enhanced powerline safety settings program (EPSS) (Area for Continued Improvement PG&E-23-26).

## II. GRID DESIGN, OPERATIONS, AND MAINTENANCE

### A. Energy Safety should require PG&E to revise its alternatives analysis to address substantive concerns raised by intervenors (Area for Continued Improvement 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>7</sup> In fact, PG&E did not provide any meaningful analysis of grid hardening alternatives until its September 27, 2023 Supplemental Response, six months after it filed its Initial 2023-2025 WMP.<sup>8</sup> This late-submitted alternatives analysis did not sufficiently justify PG&E’s continued focus on widespread undergrounding as a primary wildfire mitigation.

Intervenors identified numerous flaws with PG&E’s alternatives analysis. Among other things:

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<sup>7</sup> “In its 2023 WMP, PG&E must ... Evaluate all alternatives to undergrounding, both as individual mitigations as well as combinations, focusing on addressing location-specific risks.” Energy Safety, *Final Decision on 2022 Wildfire Mitigation Plan Update: Pacific Gas and Electric Company*, November 2022, (Decision on 2022 WMP) Area for Continued Improvement PG&E-22-34 at 184.

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.

<sup>8</sup> PG&E’s 2023-2025 Wildfire Mitigation Plan (WMP) – Supplemental Revision Notice Response, September 27, 2023 (PG&E’s Supplemental Response), attachments 2023-09-27\_PGE\_23-05\_SRNR\_R0\_Atch02 and 2023-09-27\_PGE\_23-05\_SRNR\_R0\_Atch03.

- PG&E does not evaluate combinations of mitigations.<sup>2</sup>
- PG&E’s analysis uses outdated and unrealistic estimates for the effectiveness of mitigations.<sup>10</sup>
- PG&E’s analysis uses outdated and unrealistic estimates for the cost of mitigations.<sup>11</sup>
- PG&E’s “secondary filter” process is opaque and not well justified.<sup>12</sup>
- PG&E’s “secondary filter” process is not location-specific.<sup>13</sup>
- PG&E selects undergrounding even in some locations where other mitigations are more risk-spend efficient *and* none of PG&E’s “secondary filters” recommend undergrounding.<sup>14</sup>
- PG&E’s analysis does not appropriately account for increased short-term risk associated with the long lead time of undergrounding.<sup>15</sup>

The Draft Decision does not address these material concerns about PG&E’s alternatives analysis. Instead, the Draft Decision states that PG&E has “sufficiently

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<sup>2</sup> See, e.g., *Public Advocates Office Opening Comments on Pacific Gas and Electric’s 2023-2025 Wildfire Mitigation Plan Supplemental Response to Revision Notice*, October 13, 2023 (Cal Advocates comments on PG&E’s Supplemental Response) at 7;

*Mussey Grade Road Alliance Comments on 2023-2025 Wildfire Mitigation Plans R3 of PG&E and Associated Files*, October 13, 2023 (MGRA comments on PG&E’s Supplemental Response) at 4-5;

*Comments of The Utility Reform Network on Pacific Gas and Electric Company’s 2023-2025 Wildfire Mitigation Plan Supplemental Response to Revision Notice*, October 13, 2023 (TURN comments on PG&E’s Supplemental Response) at 6.

<sup>10</sup> See, e.g., Cal Advocates comments on PG&E’s Supplemental Response at 7-8; MGRA comments on PG&E’s Supplemental Response at 4.

<sup>11</sup> See, e.g., Cal Advocates comments on PG&E’s Supplemental Response at 7-8.

<sup>12</sup> See, e.g., Cal Advocates comments on PG&E’s Supplemental Response at 9; MGRA comments on PG&E’s Supplemental Response at 6-7; TURN comments on PG&E’s Supplemental Response at 5-6.

<sup>13</sup> See, e.g., Cal Advocates comments on PG&E’s Supplemental Response at 9; MGRA comments on PG&E’s Supplemental Response at 12-13.

<sup>14</sup> See, e.g., Cal Advocates comments on PG&E’s Supplemental Response at 10.

<sup>15</sup> See, e.g., *Response to the September 27, 2023 PG&E “2023-2025 Wildfire Mitigation Plan R3,”* October 13, 2023 (Joint Party comments on PG&E’s Supplemental Response) at 3-4.

addressed the required progress.”<sup>16</sup> Although the Draft Decision does require PG&E to provide more accurate effectiveness estimates and to include “location-specific undergrounding effectiveness compared to combinations of mitigations” in its next WMP update,<sup>17</sup> it does not direct PG&E to address the numerous other deficiencies in its alternatives analysis.

PG&E dismisses the above intervenor concerns.<sup>18</sup> Instead, PG&E continues to rely on vague qualitative explanations that fail to address the numerous, detailed, and quantitative concerns raised by intervenors. By failing to require further remedies, the Draft Decision tacitly accepts PG&E’s explanations, and thereby increases the likelihood that PG&E will utilize Energy Safety’s approval of this WMP to justify undergrounding projects that are neither just nor reasonable when fully and properly assessed against alternative mitigations. PG&E has already used the existence of its 2023-2025 WMP (although not at that point approved) to attempt to justify ratepayer funding of PG&E’s undergrounding initiatives, despite its failure to address these key concerns.<sup>19</sup>

As intervenors have identified, undergrounding is the slowest and most expensive wildfire mitigation method available to utilities. Continued reliance on undergrounding will likely result in substantial ratepayer funding of a slow mitigation that, by PG&E’s own admission, may not address risk on a number of the riskiest circuit segments.<sup>20</sup> This is not in the best interests of the public from either a safety or financial perspective.

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<sup>16</sup> Draft Decision, Table A-1, Area ID PG&E-22-34 at A-10.

<sup>17</sup> Draft Decision, Area for Continued Improvement PG&E-23-05 at 102.

<sup>18</sup> *Reply Comments of Pacific Gas and Electric Company to the 2023-2025 Wildfire Mitigation Plan Supplemental Revision Notice Responses*, October 20, 2023 at 2-5.

<sup>19</sup> See, e.g., A.21-06-021, *Ex parte filed by Pacific Gas and Electric Company*, October 11, 2023, in which PG&E stated “The A/PD underfunds work *required* in the A/PD or WMP” (emphasis original).

<sup>20</sup> “PG&E argues that it is mitigating the risk of ... 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. However, PG&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.” *Public Advocates Office Opening Comments on Pacific Gas and Electric’s 2023-2025 Wildfire Mitigation Plan Supplemental Response to Revision Notice*, October 13, 2023 at 4.

Energy Safety should require PG&E to demonstrate that its proposed investments are both just and reasonable.<sup>21</sup>

Cal Advocates urges Energy Safety to amend the Draft Decision to address the concerns described above. Specifically, Energy Safety should add the following language to ACI PG&E-23-05 to require PG&E to improve its grid hardening alternatives analysis:

- PG&E shall update its undergrounding alternatives analysis to address the following:
  - PG&E shall compare undergrounding to reasonable combinations of mitigations for each project. Combinations of mitigations shall include, at a minimum, the combination of covered conductor and all other mitigations PG&E currently utilizes or should expect to utilize within two years,<sup>22</sup> such as enhanced powerline safety settings, downed-conductor detection, partial voltage detection, etc.
  - PG&E’s comparison of mitigations shall utilize location-specific estimated costs based on recent actual costs, or reasonable projections where cost history is limited.
  - PG&E shall apply its “secondary filters” in a location-specific manner. PG&E shall not substitute proxies or circuit-level estimates for location-specific estimates.<sup>23</sup>
  - PG&E shall provide workpapers, process documents, and supporting data for each “secondary filter” it utilizes.
  - PG&E’s alternatives analysis shall account for residual risk associated with project lead times.

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<sup>21</sup> Public Utilities Code section 451.

<sup>22</sup> The long lead-time of undergrounding necessitates a forward-looking analysis. This will enable PG&E to reassess its strategies and pivot toward cheaper and faster alternatives where the analysis favors such alternatives.

<sup>23</sup> For example, PG&E stated in its Supplemental Response at 92, “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.”

For example, if one set of alternatives could be implemented within one year, while another would be implemented in two years, the residual risk associated with the one-year difference shall be included in the estimates of project costs and benefits.

- For each location where PG&E’s alternatives analysis recommends a mitigation other than undergrounding, PG&E shall provide compelling, quantitative evidence justification if it decides to pursue undergrounding.

PG&E should provide this analysis with its 2025 WMP Update (to be submitted in 2024). If PG&E asserts it is unable to provide location-specific estimates for any item, it should be required to provide a plan and a timeline to detail how and when it will be able to provide location-specific estimates prior to its next WMP submission.

**B. Energy Safety should require PG&E to provide detailed workplans for implementation of new technologies, or justify why it will not pursue new technologies (Area for Continued Improvement PG&E-23-07).**

The Draft Decision requires PG&E to report on the progress of its pilots for new technologies such as early fault detection, distribution fault anticipation, falling conductor protection, and rapid earth fault current limiters.<sup>24</sup> The Draft Decision further directs PG&E to adjust WMP commitments associated with these new technologies, “if pilots prove to be successful and PG&E is moving toward deployment.”<sup>25</sup>

Intervenors have previously raised concerns that PG&E is slowing or deprioritizing its evaluation and adoption of advanced technologies in favor of its preferred mitigation of widespread undergrounding.<sup>26</sup> As currently written, the Draft Decision appears to allow PG&E to continue deprioritizing these technologies, even if its

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<sup>24</sup> Draft Decision, Area for Continued Improvement PG&E-23-07 at 104.

<sup>25</sup> Draft Decision, Area for Continued Improvement PG&E-23-07 at 104.

<sup>26</sup> See, e.g., *Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities*, May 26, 2023 at 20-22;

*Mussey Grade Road Alliance Comments on 2023-2025 Wildfire Mitigation Plans R2 of PG&E and Revision Notice Response*, August 22, 2023 at 6-7.



pilots prove successful. There is no regulatory pressure on PG&E to adopt new technologies even if – as preliminary evidence suggests – they may prove cost-effective and relatively quick to deploy.<sup>27</sup>

Energy Safety should amend its Draft Decision to encourage PG&E to adopt new technologies once they prove viable. If PG&E chooses not to pursue these technologies, it should provide adequate justification and demonstrate that the risk reduction opportunities posed by the new technology can be more cost-effectively managed through alternate means. A failure to provide such a justification would be neither just nor reasonable.

Specifically, Energy Safety should revise Area for Continued Improvement PG&E-23-07 to include the following additional requirements:<sup>28</sup>

- PG&E shall estimate the cost of deploying each new technology at scale (for example, across at least 1,000 circuit miles of high-fire-risk distribution).
- PG&E shall estimate the wildfire mitigation effectiveness of each new technology at scale.
- In the first WMP submission following a successful pilot for each new technology, if PG&E plans to begin deployment within the next three years, PG&E must provide a detailed workplan to demonstrate the expected rollout of the new technology over the following three years.
- Following a successful pilot for each technology, if PG&E does *not* plan to begin deployment during the next three years, PG&E must provide a detailed analysis to demonstrate that this decision promotes the

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<sup>27</sup> “PG&E estimates the cost of implementing REFCL is approximately \$0.15 million per mile – that is, 1/5th of the \$0.8 million per mile cost of covered conductor and 1/20th of the \$3 million (or more) per mile for undergrounding. It is reasonable to conclude that strategic application of covered conductor and REFCL could present an effective, prudent, and feasible alternative for high-risk locations where undergrounding would be costly, difficult, or time consuming.” *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>28</sup> Draft Decision, Area for Continued Improvement PG&E-23-07 at 104.

maximum safety, reliability, and affordability to its customers.

PG&E should address these requirements in its 2025 WMP Update. These requirements will promote public safety and prompt risk mitigation by pushing PG&E to adopt new technologies that prove effective.

### III. CROSS-CATEGORY

#### A. **Energy Safety should require PG&E to fully analyze and justify the safety impacts of its enhanced powerline safety settings program (EPSS) (Area for Continued Improvement PG&E-23-26).**

In Area for Continued Improvement PG&E-23-26, the Draft Decision correctly notes that “PG&E does not fully analyze and justify safety impacts relating to EPSS.”<sup>29</sup> This mirrors concerns raised by Cal Advocates and other intervenors in comments on PG&E’s 2023-2025 WMP.<sup>30</sup> However, the Draft Decision does not require PG&E to remediate this deficiency by performing an analysis of the safety impacts related to EPSS.<sup>31</sup> The Draft Decision merely requires continued reporting of various metrics for EPSS-related outages, and a re-evaluation of EPSS-enablement thresholds.<sup>32</sup> These requirements will improve transparency into the EPSS program, but a thorough analysis of the safety impacts of PG&E’s EPSS program is necessary to demonstrate that the benefits of the program outweigh the safety impacts.<sup>33</sup>

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<sup>29</sup> Draft Decision, Area for Continued Improvement PG&E-23-26 at 115.

<sup>30</sup> See, e.g., *Public Advocates Office Opening Comments on Pacific Gas and Electric’s Revised 2023-2025 Wildfire Mitigation Plan*, August 22, 2023 at 6-8; *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*, August 22, 2023 at 2-3.

<sup>31</sup> Draft Decision, Area for Continued Improvement PG&E-23-26 at 115.

<sup>32</sup> Draft Decision, Area for Continued Improvement PG&E-23-26 at 115-116.

<sup>33</sup> “PG&E must accurately describe the reliability and safety impacts of its use of EPSS and fully justify its choice to use EPSS, demonstrating that the benefits of its use of EPSS in reduced wildfire risk outweigh the reliability and safety impacts.” Draft Decision at 91.

Energy Safety should amend the Draft Decision to require PG&E to remediate its failure to analyze the safety impacts related to EPSS. Specifically, Energy Safety should revise Area for Continued Improvement PG&E-23-26 to include the following language:

- PG&E shall perform a quantitative analysis of the safety impacts of EPSS, particularly with regard to vulnerable populations.
- PG&E’s analysis shall identify specific populations and regions that are at increased safety risk due to EPSS-related outages.
  - For each such population or region, PG&E shall demonstrate that the benefits of EPSS outweigh these safety impacts.
  - For each such population or region, PG&E shall identify measures it will take to mitigate the safety risks associated with EPSS.

PG&E should provide this analysis with its 2025 WMP Update (to be submitted in 2024).

If PG&E is unable to provide any elements of this analysis, it should be required to provide a plan and a timeline to detail how and when it will be able to provide the full analysis prior to its next WMP submission.

#### **IV. CONCLUSION**

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

Respectfully submitted,

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