



OFFICE OF THE  
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December 4, 2023

Shannon O'Rourke  
Deputy Director  
Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

Dear Ms. O'Rourke,

I write to express my concerns and those of my community regarding the Draft Decision on Pacific Gas and Electric Company's 2023-2025 Wildfire Mitigation Plan. While the revision process has improved PG&E's proposed plan there remain significant gaps posing unacceptable risks to public safety. Our community has been hit hard by wildfires and on behalf of my office, I ask that more be done and more required of PG&E to mitigate the hazards posed by its operations.

The proposed plan does not fix known defects in PG&E's vegetation inspections. It would not have prevented either the Zogg or the Dixie fire from being ignited by PG&E. Vegetation management inspections should be sufficiently detailed to find and remove the types of hazard trees that caused these disasters. Failing to do so, ignores the recent past and leaves open the risk of similar disasters in the future.

PG&E's regulatory oversight should be focused foremost on ensuring that PG&E obeys the law. PG&E has repeatedly failed to assure the California Public Utility Commission that it is in compliance with the laws governing vegetation management. Instead, PG&E offers its own undefined standard of "substantial compliance", which is simply an admission of non-compliance.

PG&E should be required to state that its standards for routine vegetation management inspections will ensure compliance with Public Resource Code sections 4421 and 4293. Similarly, PG&E's WMP should specifically address risks addressed in the California Power Line Fire Prevention Field Guide and provide concrete plans to remedy any gaps in PG&E's processes.

Changes should also be made to PG&E's WMP approval process, as it currently allows PG&E to unilaterally make changes significantly affecting the safety of Californians. The Draft Decision of the Office of Energy Infrastructure Safety notes this problem, which is highlighted by PG&E's decision to end its Enhanced Vegetation Management program, replacing it with a smaller less rigorous effort.

PG&E's safety gaps are not limited to tree inspections. The Office of Energy Safety has identified many areas for continued improvement. As these issues are addressed and existing programs mature, I am sure that objective measures will be applied to track real-world reductions in risk. It comes down to common sense, PG&E needs to do more to find hazards and fix them.

Thank you,



Stephanie A. Bridgett  
Shasta County District Attorney