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December 14, 2023

VIA ELECTRONIC FILING

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

RE: MUSSEY GRADE ROAD ALLIANCE REPLY COMMENTS TO PG&E COMMENT 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 Plan¹ which authorizes stakeholders to file replies to comments on PG&E's 2023-2025 Wildfire Mitigation Plan Draft Decisions by December 14th, 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 The Alliance filed its Opening Comments on December 4, 2023.⁴ PG&E also filed Comments on December 4, 2023.⁵

MGRA takes issue with a single request made by PG&E in its Comments, which will be addressed by our expert in the following section.

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)

⁴ 2023-2025-WMPs; 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; December 4, 2023.(MGRA DD Comments)

⁵ 2023-2025-WMPs; Opening Comments of Pacific Gas and Electric Company to the 2023-2025 Wildfire Mitigation Plan Draft Decision Issued November 13, 2023; December 4, 2023. (PG&E DD Comments)

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

Respectfully submitted this 14th day of December, 2022,

By: /S/ ***Diane Conklin***_____

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**REPLY COMMENTS TO PG&E’S 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.⁶

1. INTRODUCTION

This Reply Comment responds to only one of PG&E’s Comments, specifically that dealing with ACI PG&E-23-07.⁷ In MGRA’s own comments on this issue, MGRA stated that OEIS was not applying enough pressure to PG&E to develop its advanced technologies. PG&E takes the opposite tack that OEIS should remove reporting requirements because PG&E has not made enough progress. PG&E’s claim and the MGRA response are discussed in the following section.

2. ISSUES

2.1. PG&E-23-07 Deployment of New Technologies (Section 11.3)

PG&E requests “*a modification to ACI PG&E-23-07 to clarify that PG&E should evaluate these new technologies at the program level*”⁸ due to its ability to provide “*location specific effectiveness values for combinations of mitigations because the new technologies programs are not yet mature enough to support this type of analysis. Currently, there is not enough historical outage/ignition data at any single location where new technologies have been deployed to support statistically valid effectiveness calculations.*”⁹

PG&E has effectively applied a Catch 22 to its program: it cannot calculate where to deploy its mitigations effectively because it has no mitigation data from the places it has not yet deployed it. Energy Safety should dismiss this argument.

⁶ 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.

⁷ PG&E DD Comments; pp. 4-5.

⁸ PG&E DD Comments; p. 5.

⁹ Id.

PG&E has numerous resources at its disposal now for calculating through physics models, SME input, and the wealth of data now available from its brethren utilities SCE and SDG&E what the effectiveness of various advanced technologies are in combination with covered conductor. SCE, for instance, as already calculated its claimed REFCL+CC combined effectiveness numbers,¹⁰ with more up-to-date estimates discoverable in its GRC case.

As MGRA warned in its DD Comments: *“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.”*¹¹

MGRA’s concerns are amplified by the CPUC’s willingness to allow undergrounding to take up a considerable fraction of PG&E’s mitigation spending.¹² However, the Commission also recognizes that advanced technologies in combination with covered conductor may provide a way to *“to reduce the risk of wildfire caused by its overhead assets at a significantly lower costs than undergrounding,”* and that *“emerging technology may soon present a more attractive alternative for ratepayers in terms of safety and costs.”*¹³ PG&E has little incentive to rapidly pilot, develop and deploy advanced technology resources when it knows that if it fails to do so the consequences will likely be higher revenue from undergrounding.

The Office of Energy Safety and the California Public Utilities Commission will need to combine efforts to combat the perverse incentive that arises out of the Commission’s mandate to provide a return to utilities for capital investments. MGRA respectfully urges OEIS to adopt the recommendations it made in its Opening Comments, specifically:

- 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

¹⁰ MGRA WMP Comments; pp. 98-99.

¹¹ MGRA DD Comments; p. 5.

¹² D.23-11-069; p. 2.

¹³ Id.; pp. 293-294.

IOUs.”¹⁴

3. CONCLUSION

MGRA respectfully requests the Office of Energy Infrastructure Safety to consider and incorporate the these additional MGRA comments.

Respectfully submitted this 14th day of December, 2023,

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

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¹⁴ MGRA DD Comments; p. 5.