



**Pacific Gas and
Electric Company**[™]

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Jessica Block
Chair
California Wildfire Safety Advisory Board
715 P Street, 20th Floor
Sacramento, CA 95814
wsab@energysafety.ca.gov

Re: **Pacific Gas and Electric Company’s Comments on the Draft California Wildfire Safety Advisory Board Policy Papers**

Dear California Wildfire Safety Advisory Board Staff:

Pacific Gas and Electric Company (PG&E) respectfully submits these comments on the three draft California Wildfire Safety Advisory Board (WSAB) Policy Papers which contain recommendations for updates to existing electric utility regulations.¹ On December 1, 2023, WSAB provided notice of the draft Policy Papers and invited stakeholders to submit written comments on the proposals contained within them.

I. PROPOSED REGULATORY CHANGES FOR CONSIDERATION

PG&E greatly appreciates the efforts of the WSAB and the Office of Energy Infrastructure Safety (Energy Safety) to obtain input from regulatory agencies, stakeholders, and the public in order to develop recommendations to address the increasing wildfire risk in California. Below we offer several specific examples of where applying a risk-focused, flexible, and efficient approach to regulatory requirements could offer considerable public benefit.²

Given the importance of each General Order (GO), the fact that they were developed “from committee work in which all branches of the electric industry have taken part,” and that the GOs “reflect

¹ These three policy papers are: (1) Draft Policy Paper on Updating Utility Regulations in Light of Climate Change and Wildfire Risks (Draft Utility Regulation Policy Paper); (2) Draft Above-Grade Distribution Systems Policy Paper (Draft Above Grade Policy Paper); and (3) Draft Policy Paper on Updating Vegetation Management Regulations and Industry Practices (Draft VM Policy Paper).

² Please note that these targeted comments are not meant to be exhaustive and that the absence of comment on a particular recommendation should not be construed as agreement.

long years of experience gained in the construction, operation and maintenance of overhead electric lines,” we look forward to continuing to be involved in the regulatory revision process.³ Of paramount concern to PG&E is that any modifications to the GOs must allow for sufficient flexibility to address the rapid pace of technological change, as well as the increasing rate of climate change. Rigid and overly prescriptive requirements could quickly become obsolete, or even counter risk-prioritized, in just a short time as the risk environment continues to become more volatile and technology continues to evolve.

A. Grid Design and Construction Recommendations Must Maintain Flexibility

Recommendations related to grid design must allow for flexibility. To that end, we are concerned that the recommendations in the Draft Utility Regulation Policy Paper related to selecting pole materials could be too prescriptive if they focus only on the identified issues of location within High Fire Threat District (HFTD) and wind speed.⁴ There are many other factors that must be taken into consideration when selecting the appropriate pole material, such as grounding concerns, environmental exposure (corrosion), soil conditions, third party attachment requirements, and proximity to the public. Given this, we would urge the WSAB and Energy Safety to avoid overly prescriptive requirements if revisions are to be made to GO 95 on pole materials.

The Draft Utility Regulation Policy Paper recommends revising GO 95 to increase pole loading calculations in HFTD areas and locations exposed to heavy winter storms or Easterly winds.⁵ While PG&E does not feel rigid, more stringent pole loading calculations would be helpful in all situations, PG&E believes revisions to GO 95 on this topic are needed and will continue to engage in the on-going discussion regarding pole loading in general through the GO 95 Rules Committee.

Similarly, we support the recommendation to evaluate revisions to GO 95 to provide additional guidance to the utilities on the appropriate use of metal, composite and concrete crossarms in the HFTD.⁶ However, any revisions should take into consideration the need for flexibility to account for varying local conditions, environmental factors, and construction limitations.

We are concerned, however, with the recommendation that specific pole heights be mandated to avoid contact with vegetation.⁷ We suggest GO 95 to minimize vegetation-powerline interactions with specified minimum separation requirements between vegetation and electric utility circuits. Electric utilities could retain the ability to determine the safest and most cost-effective way to comply with these minimum separation requirements, rather than a set mandated pole height. The electric utility must take into consideration geographic limitations, tree species, construction limitations, and other federal, state and local jurisdictional requirements that may limit the maximum height, size and easement rights of electric utility infrastructure.

B. Coordination Among Regulatory Agencies Can Improve Vegetation Management Regulations

³ General Order 95, Preface, at p. x. Available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M338/K730/338730245.pdf>.

⁴ Draft Utility Regulation Policy Paper at p. 5.

⁵ Draft Utility Regulation Policy Paper at p. 5.

⁶ Draft Utility Regulation Policy Paper at p. 5.

⁷ Draft Utility Regulation Policy Paper at p. 5.

While numerous potential changes to vegetation management regulations were explored in the Draft VM Policy Paper, we urge Energy Safety and the WSAB to consider coordinating with the California Board of Forestry on recognizing environmental impacts and proactively resolving conflicts with California Forest Practice Rules, especially in our service territory. As an example, Forest Practice Rules 916.3, 936.3 and 956.3(d) restrict the ability to mitigate vegetation that borders and covers meadows and wet areas. However, PG&E infrastructure crosses thousands of meadows and wetlands, many of which have trees that need to be worked to keep the areas safe and within GO and PRC compliance. These Forest Practice rules conflict with the GO and PRC requirements and prohibit not just removal of the vegetation in question but even pruning of the vegetation.

We welcome broad-based support and education to successfully achieve and maintain compliance with enhanced GOs, Resource Codes, or the Code of Regulations.

C. Clarification of Public Resources Code 4291 and 4292 Would Provide Improvement and Consistency

One recommendation that could be particularly helpful would be to update the GOs to provide clarification on the interaction between Public Resources Code (PRC) 4291 and utility assets. General application of defensible space has been directly associated with dwellings in State Responsibility Areas (SRAs). Clarification on target structures, applicable jurisdictions and defined clearances will help inform how utilities can document defensible space in this fashion.

Additionally, we believe utilities would benefit from “Pole Brushing” expectations outside SRAs. However, we urge the WSAB and Energy Safety to consider recommendations that would provide guidance on where clearance of a bare ground firebreak is appropriate and where it will cause avoidable damage based on surrounding risks.⁸ To help avoid conflicts with customers in residential neighborhood settings, clearances could be reasonably defined to target unimproved areas of grass, brush or forest-covered lands. Similar guidance could be beneficial for any GO 95 updates associated with pesticide and herbicide applications. There is frequent conflict with property owners over application of pesticides near their properties, and recommendations providing guidance on this issue could help avoid these conflicts.

D. Collaboration with Industry Partners and Other Stakeholders

As a general matter, we recommend efforts to revise regulations look at existing research and solicit new research or studies from organizations like Cal Poly San Luis Obispo (SLO) Wildland-Urban Interface (WUI) Institute and Desert Research Institute to recognize the significant regional variation in cover types in California. The California Code of Regulations (CCR) Title 14 Sections 1250 to 1258 could be evaluated for common themes, improved or considered for adoption as an overall efficiency to the process and help avoid duplication of code. An example, 14 CCR 1255 sub-section D defines certain situations where vegetation planted and maintained with beneficial purpose, could be an allowable exception based on risk-specific site factors.

E. Inspections, Operations and Maintenance

PG&E urges WSAB and Energy Safety to recommend moving to a more risk-informed Distribution inspection cycle that could determine inspection frequency based on various risk criteria

⁸ Examples of areas to consider include residential landscaping and areas where poles/assets are surrounded by improvements such as fences, sidewalks, driveways and/or roads.

such as wildfire consequence, and public safety risk. PG&E has concerns with revising overhead inspection frequencies to three years solely on the basis of aligning overhead inspections with underground inspection frequencies in HFTD.⁹ While PG&E does support aligning overhead and underground inspection frequencies, inspection frequencies should be risk informed. Aligning the overhead and underground inspection process could allow for this work to be performed more efficiently and reduce the impact on customers.

PG&E is concerned about potential revisions to GO 95 that would provide specific requirements on the safe closing and opening of switches.¹⁰ GO 95 is not designed to operate at such a granular level and should not attempt to take the place of an operating manual. There are many factors that go into determining the opening and closing of switches and these should be outlined at an operating manual level.

We do, however, support revisions to the GOs that would create a more sophisticated and risk-informed approach to addressing utility maintenance tags. The current approach GO 95, Rule 18 has become outdated and does not take into account the more sophisticated understanding of risk and the more advanced risk modeling that can now be performed by both the regulators and the utilities.¹¹ The simple three-level system currently in place should be revised to a more sophisticated framework that can account for these changes.

F. Remote Sensing and Situational Awareness

We urge the WSAB and Energy Safety to use caution when making recommendations related to remote sensing and situational awareness technology.¹² Given the pace at which regulations are created and revised, and the much more rapid pace at which this technology is evolving, it is very possible that any new, prescriptive GO requirements in this area would become outdated soon after the GO is published. Thus, we suggest that the recommendations in this area focus on promoting the greater adoption of sensor technologies to satisfy inspection requirements or transition to condition-based maintenance strategies.

G. PG&E Supports the Continued Exploration of Above-Grade Distribution System Technology

Lastly, PG&E welcomes the continued evaluation of above-grade distribution systems (AGDS) and supports the recommendations to: (1) create workshops/working groups to better understand the best uses of AGDS; (2) encourage AGDS pilot projects; (3) consider revising GO 128 to include AGDS design; (4) examine the use of AGDS technology in transmission systems; (5) engage local governments and stakeholders on the use of AGDS.¹³ However, we urge the WSAB and Energy Safety to use caution when considering inflexible mandates that would require all reconstructed distribution systems to be either underground or AGDS or which would require AGDS to be installed based on specific metrics.¹⁴

⁹ Draft Utility Regulation Policy Paper at p. 7.

¹⁰ Draft Utility Regulation Policy Paper at p. 7.

¹¹ One small change, but one which could have a great impact, would be to exclude missing high-voltage signs from these requirements as this issue has become outdated and no longer presents a risk to the public.

¹² Draft Utility Regulation Policy Paper at pp. 7-8.

¹³ Draft Above Grade Policy Paper at pp. 3-4.

¹⁴ Draft Above Grade Policy Paper at p. 4.

AGDS is still a new technology and creating rigid mandates requiring its installation could end up being harmful until the advantages and limitations of this technology are better understood.

II. CONCLUSION

We appreciate the opportunity to provide these comments and look forward to further discussion and engagement on this important topic.

Should you have any questions or concerns, please do not hesitate to contact the undersigned at vincent.tanguay@pge.com.

Very sincerely yours,
/s/ Vincent Tanguay
Vincent Tanguay