



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

May 7, 2024

Caroline Thomas Jacobs
Director, Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Electronically Filed to Docket # 2023-2025-WMPs

**RE: Opening Comments of the Rural County Representatives of California on
Group 1 2025 Wildfire Mitigation Plan Updates**

Dear Director Thomas Jacobs:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to provide comments on the 2025 Wildfire Mitigation Plan (WMP) Updates for investor-owned utilities identified in Group 1.¹ RCRC is an association of forty rural California counties, and our Board of Directors is comprised of elected supervisors from each member county. While Pacific Gas and Electric's (PG&E's) service territory encompasses the vast majority of our member counties, Southern California Edison's (SCE's) service territory also comprises some of our member counties; as such, the general focus of our comments pertain to the updates provided by PG&E and SCE.

Wildfire Mitigation Plans are vital to drive thoughtful ratepayer investments into safe, reliable energy delivery to preserve quality of life, natural resources, and achieve statewide climate change goals. Safeguarding California's residents from future harm resulting from a utility-caused wildfire event is one of RCRC's primary public policy objectives. Communities across California have experienced great financial hardships in attempting to recover from catastrophic wildfire events and in mitigating the risk of consequences, including implementing home hardening measures and maintaining defensible space.

Grid Design and System Hardening

RCRC does not oppose the reasonable use of fast-trip settings to reduce the risk of igniting catastrophic wildfires; however, RCRC seeks a greater examination of these

¹ Group 1 includes Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Bear Valley Electrical Services Inc. (BVES).

programs given the growing reliance to use these mitigations (potentially long-term) and the disproportionate impacts to rural customers and communities. Loss of power, especially unexpected outages that may be prolonged or occur frequently, is harmful for public health reasons and has detrimental effects on local economies. As the state moves towards greater electrification as a decarbonization strategy, residents in Tier 2 and Tier 3 High Fire Threat Districts (HFTDs) are experiencing greater energy uncertainty, impeding the practical shift toward greater electrification of homes, equipment, and vehicles.

We appreciate Energy Safety's requirement that PG&E² and SCE³, as an Area for Continued Improvement (ACI), monitor and report on fast-trip settings. As we pinpoint circuits that have been prone to repeated outages, RCRC seeks a correlated, durable mitigation strategy that would reduce the occurrence of these outage consequences on particular circuit segments, such as the installation of covered conductor or undergrounding. Within each utility's workplan, RCRC requests incorporating data related to whether fast-trip outages have occurred on circuits to help inform customers and communities of when planned system hardening upgrades are scoped to provide greater resilience and energy reliability.

While these ACI-driven fast-trip spreadsheets are informative, the data supplied by PG&E and SCE are not standardized and vary significantly. We urge Energy Safety to require reportable metrics more consistently across utilities in the future. For instance, the information supplied by PG&E includes far greater details on the customers and critical facilities impacted, such as those that are medical baseline or life support, schools, hospitals, or well-water dependent households, etc., as well as the date of the outage and the location (county) affected, while SCE provides greater insight into the cause of the outage. Such details should be provided more uniformly. Finally, we urge utilities to provide an accompanying narrative of their respective annual fast-trip reliability study to include lessons learned, and whether workforce constraints, ongoing maintenance, or additional system hardening improvements will be scoped on frequently de-energized (or "fast-tripped") circuits as described above.

Vegetation Management

While PG&E included modifications in their 2025 WMP Update to realign system hardening targets with their recently approved 2023-2026 General Rate Case (GRC), the approved GRC "One Veg"⁴ program is notably missing. By way of background, CPUC Decision 20-05-019 ordered a Root Cause Analysis (RCA) of PG&E's role in the 2017 and 2018 wildfires in its service territory and made recommendations to mitigate these risks in the future; Envista was selected in 2021 to conduct the RCA. Among Envista's

² ACI PGE-23-26, Evaluation and Reporting of Safety Impacts Relating to EPSS.

³ ACI SCE-23-15, Continued Monitoring of Fast Curve Settings Impact.

⁴ See CPUC Decision 23-11-069.

numerous recommendations and PG&E's resulting Corrective Actions were to combine various vegetation management programs to improve efficiencies. This resulted in PG&E's proposed "One Veg" program, costs of which were fully approved in PG&E's most recent 2023-2026 General Rate Case. However, the 2025 WMP Update does not discuss the "One Veg" program and continues to outline various successor programs to the Enhanced Vegetation Management (EVM) program that was discontinued by 2023. All this to say, it is very unclear how these programs interact and operate under the "One Veg" umbrella (if at all), or whether these successors⁵ will potentially transition into the "One Veg" program. For these reasons, we urge Energy Safety to require PG&E to provide a more complete overview of its vegetation management operations in the 2026-2028 WMP for greater transparency.

RCRC acknowledges that many of Energy Safety's Areas for Continued Improvement for PG&E will be reflected in the upcoming 2026-2028 comprehensive WMPs and, therefore, are not reflected in PG&E's 2025 WMP Update. However, we must reiterate the importance to manage both debris (branches, limbs, wood chips) and wood (larger diameter logs greater than 4 inches) generated by PG&E's tree work. Forest waste adds fuel load and can impact defensible space for property owners and shift safety liabilities onto neighborhoods and communities. While San Diego Gas and Electric's (SDG&E's) waste diversion goals⁶ are laudable, we acknowledge the sheer volume of PG&E's vegetation management activities may not lend itself to an equivalent strategy. PG&E received the full approval of requested vegetation management costs in their recent GRC.⁷ It is baffling for PG&E to claim they do not have the resources to address the residual effects of its vegetation management activities, nor should they continue to justify the exclusion of larger diameter wood management. For example, recent PG&E notices to customers⁸ do not offer an opt-in process for customers to request large diameter wood (greater than 4 inches) to be removed, despite assurances to the contrary.⁹ This backsliding is unacceptable. PG&E must have procedures in place to handle the residual effects of its tree work if requested to do so, and should not continue

⁵ These initiatives include Focused Tree Inspections (FTI), Tree Removal Inventory (TRI), and Vegetation Management Operational Mitigation (VMOM).

⁶ A component of SDG&E's broader sustainability initiative is to increase diversions of wood and slash material associated with its tree operations to a recycling facility; currently 55% of total wood debris is diverted to a recycling facility to be rendered for composting or other environmentally sustainable materials. See Page 277, *SDG&E 2023-2025 Wildfire Mitigation Plan*, revised April 2, 2024.

⁷ CPUC Decision 23-11-069 further indicates that cost savings in the vegetation management program are correlated with an increased reliance on Enhanced Powerline Safety Settings (EPSS) to reduce wildfire risk. Therefore, costs for the residual waste of tree work, including wood haul, should have sufficient resources authorized.

⁸ See Attachment; website (<https://bit.ly/3weZFml>) accessed May 2, 2024.

⁹ Page 47, *PG&E 2025 Wildfire Mitigation Plan Update*, April 2, 2025 states, "We will continue to benchmark our Wood Management program and identify best practices with other utilities who wish to participate, including the addition of Liberty Utilities, to ensure a comprehensive comparison and identify the origin of any potential differences in scope."

to externalize the hazards created through PG&E's standard operations and normal course of business.

De-Energizations, Public Safety Power Shut-offs (PSPS)

Some of the conclusions presented by PG&E warrant additional scrutiny, chiefly the customer impact reductions from the Public Safety Power Shut-off (PSPS) program is declining because it is “directly correlated to completing the undergrounding program.”¹⁰ RCRC does not take issue with incorporating cost recovery amounts authorized by the GRC to align with WMP targets more accurately. However, PG&E has multiple tools available to deliver safe, continuous power, including other system hardening technologies beyond just undergrounding. The CPUC's Decision on PG&E's recent GRC should not disproportionately impact the PSPS program potentially to the degree it claims given the authorization to complete system hardening projects on over 2,000 combined miles¹¹ and expand its Enhanced Powerline Safety Settings (EPSS) program. Energy Safety should, therefore, reject such implications that PG&E's system hardening work will have a negligible effect on PSPS if not solely undergrounded.¹²

Finally, the Public Utilities Code¹³ does not necessarily distinguish between proactive PSPS events and reactive fast-trip settings when deenergizing portions of the electrical distribution system. In PG&E's case, PSPS and EPSS are complementary programs and are implemented together.¹⁴ In an effort to improve both energy reliability and account for public health and safety impacts at the customer level, WMPs should also apply certain PSPS objectives to Fast-Trip settings—namely, that it is appropriate to take measures to reduce the scope, scale, frequency, and duration of outage events over time. Practical solutions should also be implemented on frequently impacted fast-trip circuits in an effort to reduce repeated fast-trip outages on customers and ultimately reduce the overreliance on the PG&E's EPSS program as a primary mitigation strategy.

¹⁰ Page 3, PG&E *2025 Wildfire Mitigation Plan Update*, April 2, 2025.

¹¹ Page 21, PG&E *2025 Wildfire Mitigation Plan Update*, April 2, 2025; the GRC Decision authorized 1,230 undergrounding miles and 778 overhead covered conductor miles for a combined 2,008 miles.

¹² In PG&E's response to Mussey Grade Road Alliance (MGRA) Data Request, all of the PSPS reduction in customers impacted corresponds proportionately to a decrease in undergrounding miles only; see MGRA_0009-Q005, requested April 8, 2024.

¹³ Section 8386 authorizes electrical corporations to deenergize portions of their distribution system to minimize wildfire risk. While this has, and necessarily so, evolved into the highly scrutinized Public Safety Power Shut-off (PSPS) program, other de-energizations as a result of other wildfire safety protocols—fast-trip settings, specifically—have not received commensurate oversight and consumer protections despite inherent similarities and program dependencies, namely that power must be shutoff to prevent wildfire ignition risk.

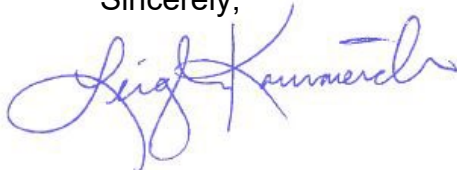
¹⁴ Page 303, CPUC Decision 23-11-069.

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Conclusion

Thank you for your consideration of our comments. RCRC appreciates the continued diligence of Energy Safety's staff to continuously improve this public process and drive meaningful outcomes. If you have any questions, please do not hesitate to contact me at (916) 447-4806 or lkammerich@rcrcnet.org.

Sincerely,



LEIGH KAMMERICH
Policy Advocate

Attachment

Trees and powerlines

We work every day to keep vegetation away from powerlines to prevent wildfires and ensure reliable power

Keeping trees away from powerlines

Feedback

Tree work near distribution and transmission lines

Tree work near poles and towers

What you can expect

Frequently asked questions

What to expect while work is underway

We will call the property owner, conduct a site visit or leave a doorhanger at the property before conducting work.

While work is underway

- We will mark trees that require pruning or need to be cut down with paint. In some cases, crews will tie ribbons to trees that need to be addressed.

- Typically, four to six weeks after the inspection, we will return to perform the vegetation work. Timing may vary depending on crew safety and weather conditions. If the work is identified as an urgent safety concern, we will address it right away.

After vegetation work is complete

- Tree branches and limbs that are less than 4 inches in diameter will either be chipped and hauled away or cut into smaller pieces and spread on site.
- Larger wood will remain in a safe position on site. This wood legally belongs to the property owner.
- If you have any questions about the wood from trees we cut down on your property, please reach out to us at [1-800-743-5000](tel:1-800-743-5000).
- Stumps are typically treated to prevent re-growth with an Environmental Protection Agency-approved herbicide that is applied directly to the stump. Any crew member applying herbicides will be supervised by a person with a Qualified Applicator License (or similar certification) from the Department of Pesticide Regulations, a division of the California Environmental Protection Agency.
- Crews may conduct follow-up inspections to ensure work meets required safety standards.

To learn more about how we are addressing wood from trees cut down following recent fires, visit [wildfire recovery](#).