



September 30, 2024

Via Electronic Filing

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
Sacramento, CA 95184
efiling@energysafety.ca.gov

Subject: Reply Comments of the Public Advocates Office on the Draft Decision Approving Pacific Gas and Electric Company's 2025 Wildfire Mitigation Plan Update

Docket: 2023-2025-WMPs

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following reply comments on the Draft Decision Approving Pacific Gas and Electric Company's 2025 Wildfire Mitigation Plan Update. Please contact Nathaniel Skinner (Nathaniel.Skinner@cpuc.ca.gov) or Henry Burton (Henry.Burton@cpuc.ca.gov) with any questions relating to these comments.

We respectfully urge the Office of Energy Infrastructure Safety to adopt the recommendations discussed herein.

Respectfully submitted,

/s/ **Marybelle C. Ang**

Marybelle C. Ang
Attorney

Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Telephone: (415) 696-7329
E-mail: Marybelle.Ang@cpuc.ca.gov

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION	1
II. INTERVENOR INPUT AND RECOMMENDATIONS.....	2
A. ENERGY SAFETY SHOULD EXPLAIN HOW IT INCORPORATES INTERVENOR INPUT AND RECOMMENDATIONS IN EVALUATING PG&E'S 2025 WMP UPDATE.	2
1. The Draft Decision does not meet the level of analysis set by previous years' decisions.	2
2. The Draft Decision does not evaluate intervenors' analyses and recommendations.....	3
3. Energy Safety should consider the substantial body of evidence revealed through intervenor discovery.	6
4. Remedy: Energy Safety should explain how it considers intervenors' analysis and recommendations.	6
III. CONCLUSION.....	6

I. INTRODUCTION

On April 2, 2024, Pacific Gas and Electric Company (PG&E) filed its *2025 Wildfire Mitigation Plan Update* (2025 WMP Update).¹⁻² On May 7, 2024, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) and other intervenors filed formal comments on the 2025 WMP Update of PG&E.³⁻⁴ On June 20, 2024, Energy Safety issued a Notice of Errata and supplemental reportable updates for PG&E’s 2025 WMP Update.⁵ On July 5, 2024, PG&E filed a revision to its 2025 WMP Update and its 2023-2025 WMP.⁶

On August 29, 2024, Energy Safety issued its Draft Decision on PG&E’s 2025 WMP Update.⁷ The cover letter of the Draft Decision invites interested persons to file opening comments by September 18, 2024 and reply comments by September 30, 2024.

Pursuant to the Energy Safety *Revised 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (WMP Process Guidelines),⁸ the *Revised 2025 Wildfire Mitigation Plan Update Schedule* (Revised WMP Update Schedule),⁹ and the cover letter of the Draft Decision, Cal Advocates submits these reply comments on the Draft Decision. In these comments, Cal Advocates makes the following recommendations:

¹ PG&E, *2025 Wildfire Mitigation Plan Update*, April 2, 2024 (PG&E’s 2025 WMP Update R0).

² Many of the Public Utilities Code requirements pertinent to wildfires apply to “electrical corporations.” See e.g., Public Utilities Code Section 8386. These comments use the more common term “utilities” and the phrase “electrical corporations” interchangeably to refer to the entities that must comply with the wildfire safety provisions of the Public Utilities Code.

³ Cal Advocates, *Comments of the Public Advocates Office on G&E’s 2025 Wildfire Mitigation Plan Update*, May 7, 2024 in docket 2023-2025-WMPs (Cal Advocates Comments on PG&E’s 2025 WMP Update).

⁴ Cal Advocates uses the term “**intervenor**” to refer to organizations that are not utilities and that regularly participate in the WMP process. An equivalent term would be “**non-utility stakeholder**.”

⁵ Energy Safety, *Notice on Errata and Supplemental Reportable Updates for Pacific Gas and Electric Company 2025 Wildfire Mitigation Plan Update*, June 20, 2024.

⁶ PG&E, *2025 Wildfire Mitigation Plan Update R1*, July 5, 2024 (PG&E’s 2025 WMP Update R1); PG&E, *2023-2025 Wildfire Mitigation Plan R6*, July 5, 2024 (PG&E’s 2023-2025 WMP R6).

⁷ Energy Safety, *Draft Decision Pacific Gas and Electric Company 2025 Wildfire Mitigation Plan Update*, August 29, 2024 (Draft Decision on PG&E’s 2025 WMP Update).

⁸ Office of Energy Infrastructure Safety (Energy Safety), *Revised 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, January 31, 2024, in docket 2023-2025-WMPs. See also, Energy Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022.

⁹ Energy Safety, *Revised 2025 Wildfire Mitigation Plan Update Schedule*, February 22, 2024, in docket 2023-2025-WMPs.

- Energy Safety should explain how it incorporates intervenor input in its evaluation of PG&E's 2025 WMP Update.
- Energy Safety should briefly describe each intervenor's recommendations and explain how it addresses each issue.
- Energy Safety should cite and reference intervenor contributions in the final decision.

II. INTERVENOR INPUT AND RECOMMENDATIONS

A. Energy Safety should explain how it incorporates intervenor input and recommendations in evaluating PG&E's 2025 WMP Update.

In opening comments on Energy Safety's Draft Decision on PG&E's 2025 WMP Update, Green Power Institute (GPI) and Mussey Grade Road Alliance (MGRA) note that the Draft Decision should better consider the analysis and recommendations provided by intervenors.¹⁰ Both GPI and MGRA voice concerns that Energy Safety relies on PG&E's statements without adequate consideration of intervenors' contributions and concerns.¹¹

1. The Draft Decision does not meet the level of analysis set by previous years' decisions.

MGRA states that Energy Safety has narrowed the scope and thoroughness of its WMP review compared to last year's review.¹² Energy Safety's analysis in the Draft Decision relies heavily on information provided by PG&E. The Draft Decision does not demonstrate how Energy Safety considers intervenor contributions. Key areas raised by intervenors – such as risk modeling, grid hardening, and advanced technology deployment – are not discussed in depth in the Draft Decision.¹³ As a result, Energy Safety may be failing to identify necessary improvements in the utility's wildfire risk mitigation strategies.

¹⁰ See, e.g., *Comments of the Green Power Institute on the Draft Decision on PG&E's 2025 Wildfire Mitigation Plan Update* (GPI Comments on PG&E Draft Decision), September 18, 2024 at 4-6; *Mussey Grade Road Alliance Comments on the Office of Energy Safety Infrastructure Draft Decision on Pacific Gas and Electric Company 2025 Wildfire Mitigation Plan Update* (MGRA Comments on PG&E Draft Decision), September 18, 2024 at 4-6.

¹¹ See, e.g., GPI Comments on PG&E Draft Decision at 4-6; MGRA Comments on PG&E Draft Decision at 4-6.

¹² MGRA Comments on PG&E Draft Decision at 3.

¹³ MGRA Comments on PG&E Draft Decision at 5.

Several concerns observed in last year's WMP decision are not addressed.¹⁴ For example, MGRA notes that Energy Safety accepts PG&E's estimate for the effectiveness of covered conductor and the conclusions PG&E draws from this estimate.¹⁵ This results in erroneous conclusions from Energy Safety about the reasonableness of PG&E's response to the Area for Continued Improvement (ACI) PG&E-23B-05 that Energy Safety established in a previous decision.¹⁶ Based on intervenors' analysis, Energy Safety should instead find that PG&E did not reasonably complete the required remedies Energy Safety identified in last year's decision.¹⁷ The Draft Decision should therefore state that PG&E failed to respond to ACI PG&E-23B-05.

2. The Draft Decision does not evaluate intervenors' analyses and recommendations.

In 2024, five intervenor organizations commented on PG&E's 2025 WMP Update.¹⁸ These comments total approximately 300 pages and cover a wide range of substantive issues.¹⁹ For instance, Cal Advocates commented on PG&E's updated risk model, system hardening programs, rapid earth-fault current limiter pilot, and asset inspection and maintenance practices.²⁰ Cal Advocates' comments include 22 distinct, actionable recommendations related to PG&E's 2025 WMP Update.²¹ However, Energy Safety acknowledges only one of these recommendations.²²

¹⁴ MGRA Comments on PG&E Draft Decision at 6-8.

¹⁵ MGRA Comments on PG&E Draft Decision at 7-8.

¹⁶ MGRA Comments on PG&E Draft Decision at 7-8.

¹⁷ See Cal Advocates Comments on PG&E's 2025 WMP Update at 35-43; MGRA Comments on 2025 WMP Updates at 42-45, 54-55.

¹⁸ Comments were filed on May 7, 2024, by the Green Power Institute (GPI), the Mussey Grade Road Alliance (MGRA), the Rural County Representatives of California (RCRC), the California Department of Fish and Wildlife (CDFW), and the Public Advocates Office at the California Public Utilities Commission (Cal Advocates). See Energy Safety docket 2023-2025-WMPs.

¹⁹ Some of the comments address multiple electric utilities.

²⁰ Cal Advocates Comments on PG&E's 2025 WMP Update.

²¹ Cal Advocates Comments on PG&E's 2025 WMP Update at 2-4: Table of Recommendations.

²² Cal Advocates commented that PG&E should be required to analyze the benefits and costs of expanding the scope of its detailed asset inspections. Energy Safety acknowledges this recommendation and incorporates it into an Area for Continued Improvement in its Draft Decision on PG&E's 2025 WMP Update at 62-63, A-13.

Energy Safety gives other intervenors' comments on PG&E's system hardening programs and risk models similarly cursory treatment. For example, MGRA notes that PG&E's estimated effectiveness of covered conductor is substantially lower than the field data from its peer utility Southern California Edison Company (SCE).²³ GPI urged Energy Safety to require PG&E to provide comprehensive documentation on its wildfire distribution risk model.²⁴ The Draft Decision does not discuss these concerns.

The Draft Decision should better address intervenors' concerns. Intervenors bring additional subject matter expertise to WMP matters. Energy Safety should include and evaluate intervenor comments in WMP decisions to show that it has taken a considered and non-arbitrary approach, even if Energy Safety does not agree with the concern expressed by an intervenor. This type of feedback can help intervenors provide more useful information to Energy Safety going forward.

Ninety-five percent of the 241 citations in the Draft Decision refer to utility source material or previous decisions, rather than responses to data requests or intervenors' analysis.²⁵ Moreover, the few citations to PG&E's responses to data requests refer only to Energy Safety's own data requests.²⁶ In contrast, the Draft Decision frequently references PG&E's assertions: for example, the Draft Decision summarizes only PG&E's claims regarding the long-term risk reduction of undergrounding compared to covered conductor, even though PG&E's claims have been challenged by intervenors.²⁷

Table 1 below provides a partial list of the issues that Cal Advocates, MGRA and GPI raised in initial WMP comments.²⁸

²³ *Mussey Grade Road Alliance Comments on the 2025 Update of the Wildfire Mitigation Plans of PG&E, SCE, and SDG&E* (MGRA Comments on 2025 WMP Updates), May 7, 2024 at 26.

²⁴ *Comments of the Green Power Institute on the Group 1 2025 Wildfire Mitigation Plan Updates* (GPI Comments on 2025 WMP Updates), May 7, 2024 at 1-4.

²⁵ MGRA Comments on PG&E Draft Decision 4 : "For example, the PG&E Draft Decision contains 241 citations. Only 3 of these citations are to data requests rather than utility source material or previous WMPs and decisions." Note that Cal Advocates identified 228 out of 241 citations (or 95%) that meet this criterion.

²⁶ The cited data requests pertain to risk modeling and vegetation management.

²⁷ Draft Decision at 21-23, under the subheading "Energy Safety Evaluation." Cal Advocates notes several deficiencies in PG&E's claims; see Cal Advocates Comments on PG&E's 2025 WMP Update at 41-42. See also *Public Advocates Office's Opening Comments on the Draft Decision Approving Pacific Gas and Electric Company's 2025 Wildfire Mitigation Plan Update*, September 18, 2024 at 4-5.

²⁸ Comments filed on May 7, 2024, by the Green Power Institute (GPI), the Mussey Grade Road Alliance

Table 1: Issues Addressed in Intervenors' Comments on PG&E's 2025 WMP Update			
	Cal Advocates	MGRA	GPI
Risk Assessment & Modeling	<ul style="list-style-type: none"> Changes between versions of the wildfire distribution risk model 	<ul style="list-style-type: none"> Coupling of probability and consequence Health effects of wildfire smoke The effect of updated risk models on system hardening 	<ul style="list-style-type: none"> The effect of updated risk models on short-term and long-term mitigation work Risk model standardization
Grid Design, Operations, and Maintenance	<ul style="list-style-type: none"> Detailed inspection frequency Quality of detailed inspections 	<ul style="list-style-type: none"> Impact of downed conductor detection on ignitions and outages 	<ul style="list-style-type: none"> Surge arrester removals Maintenance tag closures
Vegetation Management			<ul style="list-style-type: none"> Expanded clearances Treatment and disposition of VM residues
Situational Awareness		<ul style="list-style-type: none"> Early Fault Detection implementation 	
System Hardening	<ul style="list-style-type: none"> Poor cost-effectiveness of undergrounding Unrealistic alternatives analysis REFCL progress 	<ul style="list-style-type: none"> Cost of PSPS avoidance through undergrounding Low effectiveness estimates for covered conductor Unrealistic alternatives analysis 	<ul style="list-style-type: none"> System target and expenditure changes Covered conductor scope of work Undergrounding target REFCL target

Out of all the analysis provided by intervenors, the Draft Decision limits its discussion of issues raised by intervenors to *only one issue*: the frequency of PG&E's detailed asset inspections.²⁹ Because intervenors provide their input well before Energy Safety issues its analysis, the exclusion of intervenor input on other subjects is contrary to the purpose of having a public comment and review process.³⁰

(MGRA), and the Public Advocates Office at the California Public Utilities Commission (Cal Advocates). See Energy Safety docket 2023-2025-WMPs. Table 1 covers a few key categories of issues and does not include all intervenors.

²⁹ Draft Decision at A-13: Appendix D.

³⁰ Intervenors filed extensive comments on PG&E's 2025 WMP Update on May 7, 2024. Energy Safety issued the Draft Decision on August 29, 2024.

3. Energy Safety should consider the substantial body of evidence revealed through intervenor discovery.

During the WMP review process, intervenors submitted numerous requests to PG&E for data and information.³¹ PG&E's responses highlight key concerns regarding PG&E's 2025 WMP Update. However, the Draft Decision does not discuss any information revealed through intervenor data requests, nor the insights that intervenors provided based on those data requests.³²

4. Remedy: Energy Safety should explain how it considers intervenors' analysis and recommendations.

Energy Safety should discuss intervenors' recommendations and weigh the detailed analysis and thoughtful input submitted by intervenors. Cal Advocates recommends that Energy Safety take the following steps in each of its decisions on WMPs:

- Energy Safety should weigh intervenor input (both initial comments on the WMP and comments on the Draft Decision) and provide a response to each intervenor recommendation.³³ This will show that Energy Safety has reviewed all of the record evidence and will improve the thoroughness of Energy Safety's decisions.
- Energy Safety should cite and reference intervenor inputs. This will ensure that the decision is based on a comprehensive evaluation of all available evidence. It will also support continued intervenor engagement in the WMP review process.

III. CONCLUSION

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

³¹ For example, in 2024 as part of our review and analysis of PG&E's 2025 WMP Update, Cal Advocates submitted 15 data requests to PG&E, containing a total of 116 questions. Our analysis of PG&E's 2025 WMP Update was also informed by the dozens of data requests we issued in 2023 regarding PG&E's 2023-2025 comprehensive WMP.

³² Draft Decision at A-12: Appendix C. For example, the analysis shown in Table 1 and Table 2 of Cal Advocates Comments on PG&E's 2025 WMP Update at 30 relied on PG&E's responses to data requests to demonstrate lower quality control pass rates than PG&E had reported to Energy Safety in its quarterly data reports.

³³ The CPUC employs this practice in Resolutions and Decisions. See, e.g., Resolution SPD-15, March 8, 2024 at 15-19; Decision 23-11-069 on Test Year 2023 General Rate Case for Pacific Gas and Electric Company, November 17, 2023 at 777-783.

Respectfully submitted,

/s/ **Marybelle C. Ang**

Marybelle C. Ang
Attorney

Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Telephone: (415) 696-7329
E-mail: Marybelle.Ang@cpuc.ca.gov

September 30, 2024