Pacific Gas and Electric Company

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California Wildfire Safety Advisory Board
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Re: **Pacific Gas and Electric Company's Comments on STAFF DRAFT: RECOMMENDATIONS TO THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY- April 2025**

Attn: Jessica Block

Pacific Gas and Electric Company (PG&E) respectfully submits these comments on annual recommendations to the Office of Energy Infrastructure Safety (Energy Safety) On April 22, 2025 WSAB provided notice of the draft Policy Papers and invited stakeholders to submit written comments on the proposals contained within them.

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 to review annual recommendations to address the increasing wildfire risk in California.

Below we offer comments on significant and potentially impactful themes captured in the recommendations developed by the WSAB for 2025.

I. Comments for WSAB Consideration

1. **Modeling Variability & Input Differences**: The analysis recognizes that while the wildfire spread model provided by Technosylva forms the backbone of the predictive process, it depends heavily on numerous weather models. Because each IOU may use different criteria to process weather data (ranging from forecast choices to percentile variations), the outputs can vary significantly among regions. Although such heterogeneity complicates direct comparisons, these variations reflect necessary tailoring to the unique conditions within each service territory, which would be lost in a one-size-fits-all modeling approach.

2. **Comparability and Standardization of Risk Tools and Models**: The comments raise a serious concern about the wide array of tools currently grouped under Wildfire Risk Tools. With models differing vastly—from those offering simulation interfaces to others merely providing raw output data—creating a consistent standard for comparison becomes nearly impossible. Additionally, the mandate to employ multiple risk models (with one open-source)

may not only introduce extra "noise" into the decision-making process but also conflict with the existing, closely managed enterprise risk frameworks within IOUs.

3. **Quantifying Uncertainty & Subjectivity in Modeling**: A recurring theme is the intrinsic uncertainty in wildfire modeling, particularly because key factors—such as human intervention in suppression activities—are not reflected in the models. Attempts to pin down the source of discrepancies between modeled outputs and real-world events (whether due to weather discrepancies, fuel loads, or topographic influences) risk becoming overly subjective. This subjectivity calls into question the utility of simply comparing outputs without deeper sensitivity analyses and standardized uncertainty reporting mechanisms.

4. **Ambiguity in Effectiveness Tracking Metrics**: The recommendation for "clear annual tracking" of mitigation effectiveness is viewed as ambiguous and would need to be clarified. As WSAB staff has previously recognized, absolute effectiveness in deterrence (i.e., the number of fires or ignitions prevented) is nearly impossible to quantify given the multi-variate nature of fire hazard. The low incidence rates, even in high-fire-threat areas despite extensive mitigation efforts, combined with the challenge of accurately predicting counterfactual scenarios, suggest that relying on a simple annual metric may lead to misleading results. Evaluating relative mitigation approaches is a more effective way to ensure ratepayer dollars are well invested, within the context of other community wildfire mitigation work

5. **Assessing Individual Mitigation Initiatives:** Another layer of complexity is introduced by the push to report on at least four individual mitigation efforts (such as equipment upgrades, vegetation clearances, or operational changes). Because wildfire mitigations are typically applied as a network on a given circuit or segment, isolating the impact of any single action is not possible, as the insurance industry has also recognized. The requirement should, therefore, be clarified to specify whether the focus is on singular asset improvements, combined operational strategies, or the overall network effect.

6. **Consistency and Alignment Across IOUs**: The comments highlight that each IOU currently employs its own methods for calculating the effectiveness of mitigation strategies. This lack of a common methodology makes it challenging to benchmark and compare performance across the board. While there is a desire for a standardized framework that respects individual operational contexts, regional and service territory variations are critical for successful application of risk models. Creating a cohesive picture of overall effectiveness may work for certain operational mitigations but struggle to highlight benefits or utility-specific or targeted mitigations.

7. **Operational Responsibility & Enterprise Risk Modeling**: Focus on variations in modeling takes away from how these models are applied for decision-making. Some stakeholders feel that the intrinsic uncertainties in modeling are already well recognized and that imposing additional model comparisons—especially those involving open-source models—could lead to added complexity and "noise" without necessarily improving the decision-making process. The tension between regulatory expectations and operational realities is apparent here.

8. **Accuracy of Vegetation Management Claims:** Lastly, the report asserts without evidence that certain circuits have "zero to minimal" vegetation management, despite PG&E's mitigation plan. This dispute is important because it underlines the broader issue of ensuring that all data used (or reported) for decision-making is precise and reliable.

II. CONCLUSION

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

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

Very sincerely yours,
/s/ Jerrod Meier
Jerrod Meier