



May 23, 2025

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

*Electronically Filed to Docket #2026-2028-WMPs*

**RE: Opening Comments of the Rural County Representatives of California on  
PG&E 2026-2028 Wildfire Mitigation Plan R0**

Dear Director Thomas Jacobs:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to provide comments on Pacific Gas and Electric's (PG&E's) 2026-2028 Wildfire Mitigation Plan (WMP) R0. Wildfire Mitigation Plans are essential tools for utilities to outline infrastructure investments, operational practices, and emergency protocols that directly affect public safety, economic resilience, and long-term sustainability in our communities. RCRC is an association of forty rural California counties, with a Board of Directors comprised of elected supervisors from each member county.

RCRC member counties have lived through catastrophic wildfires, and we know that careful, well-executed planning can save lives and protect property. Wildfire Mitigation Plans are vital to direct thoughtful ratepayer investments into safe, reliable energy delivery that preserves quality of life, protects natural resources, and supports statewide decarbonization goals. Safeguarding Californians from utility-caused wildfires remains one of RCRC's highest public policy priorities. 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.

**Vegetation Management**

We appreciate the continued investments in critical vegetation management (VM) activities and for PG&E, per Energy Safety's direction, to update its wood management procedures. These improvements better address the wildfire and safety risks associated with leaving woody material on site, contribute to the shared goal of defensible space

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compliance under Public Resources Code 4291, and improve customer relations.<sup>1</sup> We additionally appreciate PG&E's acknowledgement that offering wood removal and disposal may also serve to reduce customer refusals and allow PG&E to conduct this critical work.<sup>2</sup> Moreover, pilot projects in partnership with community organizations, such as the mobile carbonizer to transform wood debris into biochar in Lake County, has been a very valuable solution providing multiple community benefits.<sup>3</sup> We encourage continued community and forest resilience partnerships and sustained collaboration with local governments, NGOs, and tribes. These efforts yield broad statewide benefits and should be carried out through collective interests and shared investment across utilities, state and local governments, tribes, and community-based organizations.

While these improvements mark meaningful progress, important gaps remain that must be addressed to improve transparency and better support customers. To that end, we urge Energy Safety to require PG&E's 2026-2028 WMP to 1) clearly define criteria or qualifying circumstances for a customer to opt-in to wood removal services, and 2) ensure that customers are informed in advance of any VM work whether wood removal or slash management will be offered and actually available to them, rather than being informed afterward that their property did not qualify under PG&E's case-by-case determinations. PG&E's process still lacks the transparency needed to fully restore customer confidence to carry out these responsibilities.

Additionally, PG&E's 2026-2028 WMP does not clearly explain how the fully funded "One Veg" program approved in PG&E's 2023-2026 General Rate Case relates to, or supersedes, existing VM initiatives such as Focused Tree Inspection (FTI), Tree Removal Inventory (TRI), and Vegetation Management for Operational Mitigations (VMOM).<sup>4</sup> Clarifying this relationship would enhance transparency and provide stakeholders with a better understanding of how efficiencies and accountability mechanisms are being realized in practice.

## **Enhanced Powerline Safety Settings Program**

In general, RCRC seeks a greater examination of power outage programs, such as PG&E's Enhanced Powerline Safety Settings (EPSS) program, particularly as these measures are increasingly relied upon for long-term wildfire risk reduction. Rural customers and communities bear a disproportionate share of these impacts, especially in the short-term. 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. PG&E's Residential Storage Initiative, which offers permanent battery installations to Access and Functional Needs customers who are frequently impacted by

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<sup>1</sup> Page 586.

<sup>2</sup> Page 586.

<sup>3</sup> Section 9.8.6.1

<sup>4</sup> See Section 9.2.1.6 Updates, as well as ACI PG&E-23B-17.

EPSS outages, represents a meaningful and appropriate step to mitigate the effects on some of the most vulnerable customers.<sup>5</sup>

RCRC acknowledges the safety and wildfire risk reduction benefits of the EPSS program, and we recognize recent operational improvements in its implementation. Notably, PG&E exceeded its 2% year-over-year outage reduction target outlined in the 2023–2025 WMP, achieving a nearly 5% decrease in EPSS-related outages from 2022 to 2023.<sup>6</sup> Through 2024, the average Customer Average Interruption Duration Index (CAIDI) and Customers Experiencing a Sustained Outage (CESO) decreased to an average of 150 minutes and 818 customers, a 17 percent and 7 percent reduction, respectively, from the prior two-year period.<sup>7</sup> Additionally, in 2024 93% of outages were restored within 60 minutes.<sup>8</sup> We commend these operational gains, as well as PG&E's use of GridScope sensors and improved analytics to support faster response and to ultimately reduce customer impacts.

However, the cumulative burden on certain communities remains significant. In 2024, approximately 6% of customers protected by EPSS experienced 5 or more outages, and several circuits—such as Templeton 2113 and Camp Evers 2106—have experienced dozens of outages over a three-year period.<sup>9</sup> While PG&E highlights general mitigation strategies like vegetation clearing and animal contact prevention, the 2026-2028 WMP does not confirm whether the worst-performing circuits are receiving prioritized system hardening upgrades such as undergrounding or covered conductor. Furthermore, while average response time metrics are informative, the absence of circuit-specific restoration performance limits the ability to evaluate whether chronic outages on the same circuits are being addressed more effectively over time. We recommend greater transparency and targeted mitigation for persistently impacted circuits, like the top 10 impacted circuits from changes to EPSS.

## Remote Grids

RCRC appreciates the success of Remote Grid deployment. As noted in the 2026-2028 WMP, this is a cost-effective initiative for low-density, remote customers to receive safe and reliable power. RCRC not only applauds the reliability that these standalone power systems have delivered thus far (99.9% in 2023 and 99.83% in 2024)<sup>10</sup>, but also for PG&E's due diligence to provide Emergency Action Plans at the site of the Remote Grid for first responders, and for incorporating a process for future load growth at these locations. These are essential elements to ensure the long-term viability of Remote Grid systems.

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<sup>5</sup> Page 329.

<sup>6</sup> See Filsner Energy Partners, [PG&E Independent Safety Monitor Status Update Report](#), October 4, 2024.

<sup>7</sup> Page 328.

<sup>8</sup> Page 328.

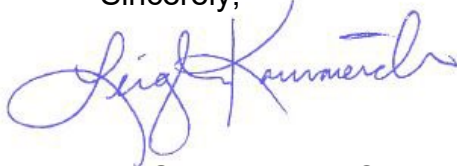
<sup>9</sup> Page 329.

<sup>10</sup> Page 208.

## Conclusion

Overall, PG&E's 2026-2028 WMP suggests an evolution from a largely compliance-driven wildfire mitigation posture to a more integrated, risk-informed and dynamic strategy, one that reflects lessons learned and a growing emphasis on proactive, data-based decision making. Thank you for your consideration of our comments. RCRC appreciates the continued diligence of Energy Safety's staff to drive meaningful outcomes. If you have any questions, please do not hesitate to contact me at (916) 447-4806 or [lkammerich@rcrcnet.org](mailto:lkammerich@rcrcnet.org).

Sincerely,



LEIGH KAMMERICH  
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