



**Matthew Pender**  
Director, Electric Operations  
Regulatory Strategy &  
Community Wildfire Safety  
Program PMO

*Street/Courier Address*  
77 Beale Street, 28<sup>th</sup> Floor  
San Francisco, CA 94105  
Phone: (415) 973-3604  
Email: Matthew.Pender@pge.com

May 27, 2020

**VIA E-MAIL**  
**CAROLINE.THOMASJACOBS@CPUC.CA.GOV**

Caroline Thomas Jacobs, Director  
Wildfire Safety Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**Subject: Pacific Gas and Electric Company’s Comments on Draft Resolutions WSD-002 and WSD-003 Regarding 2020 Wildfire Mitigation Plans**

Dear Ms. Jacobs:

Pacific Gas and Electric Company (PG&E) respectfully submits these comments on Draft Resolution WSD-002, which provides general guidance for all Commission-jurisdictional utilities regarding their 2020 Wildfire Mitigation Plans (WMP), and Draft Resolution WSD-003, which provides guidance to PG&E regarding its 2020 WMP.<sup>1</sup>

PG&E appreciates the efforts of the Wildfire Safety Division (WSD) and agrees that the 2020 WMPs represent an important step forward in developing a consistent and uniform approach to discussing and addressing wildfire risk among the Commission-jurisdictional utilities. WSD made substantial strides this year developing a common template for the 2020 WMPs, providing guidance on WMP development, and reviewing the utilities’ respective 2020 WMPs. PG&E appreciates these efforts and looks forward to future work with WSD, stakeholders, and the utilities to further refine the WMPs for future years.

As requested, PG&E is limiting these comments to factual, legal, and technical errors in the Draft Resolutions. In addition, PG&E is providing proposed changes to language in the Draft Resolutions that can correct these errors. PG&E’s comments address Draft Resolution WSD-002 in Section A and Draft Resolution WSD-003 in Section B. In Section C, PG&E addresses the issue of conditional approval. PG&E’s comments are organized in the numeric order of the Conditions in each Draft Resolution. PG&E has also included as Attachment A to

---

<sup>1</sup> Draft Resolution WSD-002 and Draft Resolution WSD-003 are referred to jointly as “Draft Resolutions.”

these comments proposed revisions to the Draft Resolutions to correct the factual and legal errors identified.

Before getting into specifics, a general observation is important. In its recent decision addressing in part the scope of Phase 2 issues in the Wildfire Mitigation proceeding (Rulemaking 18-10-007), the Commission explained that:

Both this proceeding and Wildfire Safety Division will consider the templates, maturity model, data requests, metrics and other materials furnished to parties with the Administrative Law Judge's December 16, 2019 ruling, along with party comment on those materials and on the issue of metrics development scoped into Phase 2.<sup>2</sup>

PG&E applauds the Commission's and WSD's efforts to continue to refine the maturity model and metrics that are used to evaluate the utilities' respective wildfire mitigation programs and initiatives. The experience with the 2020 WMPs demonstrates the importance of developing consistent and understandable data. The Commission, WSD, and stakeholders should be careful not to lean too heavily on 2020 WMP data until there is greater data consistency achieved across the utilities and it is determined that the data developed is the right data to use to evaluate wildfire mitigation programs. PG&E urges the Commission and WSD to engage with the utilities and stakeholders to refine the templates used and data approaches included in the 2021 WMP so that data consistency and understanding is further improved.

PG&E recommends that the WSD begin regular and ongoing collaborative discussions with stakeholders, including the utilities, starting in June 2020 regarding the WSD's data needs, format and desired outcomes. This collaborative process would help clarify data requirements and analysis approaches related to certain Conditions (including Guidance-1 and Guidance-10 and possibly others) and the 2021 WMP templates and process. Through this collaborative effort, PG&E proposes the WSD provide the finalized 2021 WMP Guidelines by the end of the third quarter of 2020 to provide sufficient time for utilities to compile the necessary information. A continuation of these regular collaborative discussions as utilities develop their 2021 WMPs within the issued Guidelines would continue to provide benefit to the WSD, utilities, and other parties in maximizing consistency and efficiency of the 2021 WMP process.

**A. Draft Resolution WSD-002 (Guidance Resolution)**

**1. Condition Guidance-1, -2, -3, -5 and -6 (Generic WSD Initiatives)**

A number of the Guidance Resolution Conditions focus on the need for additional information regarding specific "initiatives." For example, Guidance-1 focuses on lack of Risk Spend Efficiency (RSE) calculations for each initiative and Guidance-5 concerns separating the

---

<sup>2</sup> Decision (D.) 20-03-004, p. 2.

initiatives and providing more detailed cost and effectiveness data. These Conditions are, in part, factually erroneous because they assume that all of the utilities have identical initiatives and that each initiative is separately implemented and tracked by the utilities. This is incorrect as PG&E and other utilities expressed in their WMPs and as explained in more detail below.

Some background on the use of the term “initiative” in the 2020 WMP Guidelines is relevant. The 2020 WMP Guidelines were issued on December 16, 2019 and defined an initiative as a “[m]easure or activity proposed or in process designed to reduce the consequences and/or probability of wildfire or PSPS.”<sup>3</sup> In Section 5.3 of the 2020 WMP Guidelines, WSD identified ten generic initiatives<sup>4</sup> and divided these ten initiatives into sub-initiatives. The 2020 WMP Guidelines assumed that all of the utilities had identical initiatives and treated each initiative and sub-initiative as a separate program with its own tracking, cost accounting, and risk analysis. But this is not the case. Many utilities have been undertaking wildfire-related programs and initiatives for years, and the utilities’ respective programs and initiatives do not always fit neatly into the generic initiative categories and sub-categories laid out in the 2020 WMP Guidelines.

PG&E’s 2020 WMP identified this fundamental problem with the 2020 WMP Guidelines and explained our approach for addressing this issue:

The details of PG&E’s wildfire mitigation programs are presented in this Section 5.3 and the associated tables are provided in Attachment 1 – *All Tables Required by the WMP Guidelines*. In an effort to create alignment between the utilities, which have some inherent differences, the Wildfire Safety Division (WSD) provided all WMP filers with a standard list of initiatives. This list of initiatives does not always map directly to PG&E’s programmatic structure and therefore, some initiatives are not applicable to PG&E, while others have been added. Further, some activities—asset inspections, for example—are performed as an integrated function and cannot be feasibly separated into sub-elements as have been identified as separate initiatives in the provided template. As a result there are a number of initiatives without unique data, as the cost and details of that activity are captured in another portion of Section 5.3. For each initiative, PG&E is providing the information requested in the WMP guidelines to the extent possible.<sup>5</sup>

PG&E employees met with WSD on several occasions and discussed this issue, and our concern with the use of generic initiative categories.

---

<sup>3</sup> 2020 WMP Guidelines, p. 10.

<sup>4</sup> 2020 WMP Guidelines, p. 49.

<sup>5</sup> PG&E 2020 WMP, p. 5-34.

Many of PG&E's wildfire-related programs and initiatives have been in place for years and there is simply no quick or easy way to completely re-classify these programs and initiatives from an accounting, tracking, and risk perspective. Moreover, many of the initiative subcategories identified in the 2020 WMP Guidelines are part of a larger program. As an example, WSD defined sub-initiatives of "Covered conductor maintenance", "Crossarm maintenance, repair, and replacement" and "Maintenance, repair, and replacement of connectors, including hotline clamps" are part of PG&E's existing distribution asset inspection and repair program. These assets (conductors, crossarms, and connectors) are inspected, identified for repair and repaired through a singular program and are not tracked separately. Tracking these initiatives separately would require considerable time, software system changes, and training of personnel while introducing increased administrative costs and inefficiency to the existing process. PG&E tracks programs for effectiveness, risk reduction, costs, and other information, but does not track every specific component of these overall programs. It is also unclear why "budgeting and accounting" and even "subaccounts" (as referenced in Guidance-6) are critically important to the WMP process, when it is not a cost-recovery proceeding.

Draft Resolution WSD-002 ignores this issue and erroneously assumes that all of the utilities have identical initiatives and sub-initiatives, and that each initiative is accounted for, tracked, and analyzed on an initiative-specific basis. This erroneous assumption leads to Conditions which require the utilities to submit additional information broken down by WSD initiative, even if the utilities categorized their programs and initiatives differently than is outlined in the 2020 WMP Guidelines and therefore do not have these data.

This error can be easily remedied. The Conditions can be modified to state that the utilities will provide initiative-specific data and information where it is available, or as a combination of associated initiatives that are managed together. This would remove the requirement that utilities develop information for generic initiatives and sub-initiatives that they may not have or which they currently categorize differently. In Attachment A, PG&E proposes a limited change to clarify that information on specific initiatives can be provided as a combination of associated initiatives that are managed together.

PG&E understands and supports WSD's desire for increased consistency across the utilities so that effectiveness, risk, and scope can be compared. We suggest that the utilities and WSD work to develop a consensus set of initiatives that the utilities can then use to develop historic and forecasted information. If WSD and the utilities expedite this work, the utilities should have time to incorporate this approach into their 2021 WMPs in a format that can be more uniform and comparable.

## **2. Condition Guidance-1 (New Risk Assessments)**

In addition to the revisions associated with initiatives, Guidance-1 needs to be revised to use the Commission's currently adopted risk methodology, rather than the new approach proposed in Draft Resolution WSD-002. For several years, numerous stakeholders and

Commission Staff worked to develop a risk methodology that would help better inform utility decision-making. This culminated in a unanimous settlement “that achieves steps toward a more uniform and quantitative risk-based decision-making framework . . .”<sup>6</sup> The settlement was approved by the Commission in December 2018 in the Safety Model and Assessment Proceeding (S-MAP). As a result of the Commission’s decision, utilities are now required to use the S-MAP methodology in their Risk Assessment and Mitigation Phase (RAMP) proceedings. PG&E will file its RAMP application in June 2020.

Guidance-1 is factually erroneous because it assumes that each initiative directly reduces risk. However, some of the initiatives identified in the 2020 WMP Guidelines do not directly reduce risks. For example, risk mapping and simulation and data governance and its associated sub-initiatives are important, but these initiatives in and of themselves do not reduce wildfire ignition risk or wildfire consequences.<sup>7</sup> The utilities cannot do risk assessments for generic initiatives that do not reduce the specific risks identified in Guidance-1.

In addition, the Commission-approved S-MAP methodology uses a very specific risk-based analysis of the likelihood and consequence of a particular risk event, for example a catastrophic wildfire. The definition of the risk event is critical in the S-MAP risk analysis process as the likelihood of any ignition is considerably higher than the likelihood of ignition of a catastrophic wildfire and the consequences of each event are similarly divergent. As an example, while PG&E had an annual average of 440 total ignitions from 2015-2019 the average number of annual ignitions that resulted in a fire over 10 acres in size was only 19 or ~4% of the total ignitions. Therefore, defining the risk event as any ignition vs. a “wildfire” ignition of more than 10 acres would have a significant difference in the likelihood and consequence analysis. In short, the S-MAP approach of quantifying risk based on a particular event does not align with WSD’s intention in defining the ignition likelihood and wildfire consequence data now proposed in Guidance-1.

PG&E recommends that Guidance-1 be modified to state that the utilities use the approved S-MAP methodology for those initiatives that directly impact risk. This revision would address the errors described above. Alternatively, if the Commission believes that a modified risk quantification approach should be included in the utilities’ WMPs, then Guidance-1 should be a Class C condition so that the utilities have time to develop these new methodologies through a multi-stakeholder process, test them, and implement them in their respective 2021 WMPs.

### 3. **Condition Guidance-2 (Alternatives Analysis)**

---

<sup>6</sup> D.18-12-014, p. 2.

<sup>7</sup> Data governance is described as an initiative in Section 5.3.7 of the 2020 WMP Guidelines.

In addition to the revisions associated with initiatives noted above, Guidance-2 contains the factual error that every grid hardening or vegetation management initiative was selected from a number of alternatives during the development of the 2020 WMP. Several of the sub-initiatives within these two categories have been in place for many years, including “Detailed inspections of vegetation around distribution electric lines and equipment”, or are driven by compliance requirements. PG&E recommends that Guidance-2 be modified to state that the utilities provide details on alternatives considered during the development of the 2020 WMP process. This revision would address the factual errors described above

#### 4. **Condition Guidance-9 (Pilot Programs)**

PG&E agrees with WSD’s conclusion in Resolution WSD-002 that pilot programs and new technology “show potential in reducing utility wildfire risk.”<sup>8</sup> This is exactly why PG&E is exploring a number of new technologies and implementing pilot programs that may have substantial long-term customer benefits. While the Commission has been and should continue to encourage utilities to explore multiple pilot programs that have the potential to turn into impactful solutions, requiring detailed analyses of each program is unnecessary and premised on a factual error. Draft Resolution WSD-002 is factually erroneous because it assumes a stage of development for pilot programs, including analyses of these programs, that does not exist. For example, the requirement in Guidance-9 that utilities provide “quantitative performance metrics and quantitative risk reduction benefits” requires a level of detailed and rigorous analysis that is not generally available for pilot projects, nor is it necessary. A pilot program is, by definition, a program that the utility undertakes with some uncertainty about exactly how it will perform or how much risk reduction it will drive. PG&E fully supports WSD’s overarching objective to gather information regarding pilot programs, but the specific information identified in Condition-9 needs to be modified.

This error can be remedied by revising Condition-9 to either (a) be moved to a Class C condition focused on annual post-pilot reporting, such that in a utility’s WMP each year it would explain all the pilots completed in the prior year and the results, and/or (b) by simply deleting the third item required (*i.e.*, quantitative performance metrics and quantitative risk reduction). These modifications are proposed in Attachment A.

#### 5. **Condition Guidance-10 (Future Data Submission Taxonomy)**

Guidance-10 requires that “future data submissions to the WSD adhere to the forthcoming data taxonomy and schema currently being developed by the WSD.” PG&E fully supports developing a consistent taxonomy that all of the utilities can use for data submissions. However, to ensure the adequacy of data provided by utilities and success in the utilities being able to provide all the data requested in a helpful and consistent form, the utilities, and likely

---

<sup>8</sup> Resolution WSD-003, p. 24.

other parties, need to be involved in the collaborative development of the “taxonomy and schema” for these requests. The utilities operate different GIS systems with different data characteristics, software packages, tools and features. There is high risk that a unilaterally created data taxonomy will be very difficult or even impossible for one or more utilities to complete, resulting in potential frustration relating to “missing” or “inconsistent” data. It is critical that WSD understand the utilities’ respective data limitations and that all parties work together jointly to develop an approach that works for everyone. PG&E proposes that the WSD host workshops/meetings to ensure alignment and understanding of the desired outcomes for information being requested, the level of detail available and needed, and how the utilities will represent the appropriate information in their maps. The ultimate taxonomy adopted, and process used for WMP’s going forward, will greatly benefit from a collaborative effort. PG&E has proposed limited changes to Guidance-10 in Attachment A to address this issue.

**6. Condition Guidance-11 (PG&E and Contractor Employee Background Information)**

Guidance-11 addresses PG&E and employee contractor information. This Condition is substantially similar to Condition PGE-25. Factual and legal errors regarding Guidance-11 and PGE-25 are addressed below in Section B.4. Further, while condition Guidance-11 references Vegetation Management resources, the language of the condition is not precise with regards to the scope of the data being requested. Given the prominent discussion of Vegetation Management resource limitations in 2019 and to create consistency with the language in condition PGE-25, PG&E proposes that the language of condition Guidance-11 be clarified with regard to the scope being Vegetation Management resources.

**7. Condition Guidance-12 (Detailed Ten-Year Plans)**

Guidance-12 requires the utilities to provide detailed ten-year plans as a part of their respective WMPs. While PG&E recognizes the importance of long-term planning, this requirement is legally erroneous and may have adverse consequences. In Assembly Bill (AB) 1054, the Legislature directed that 2020 WMPs “cover at least a three-year period.”<sup>9</sup> There was good reason for the Legislature to specify this time period. While advanced planning has benefits, locking into specific long-term plans (*e.g.*, “a year-by-year timeline for reaching these goals” and “a list of activities that will be required to achieve this end goal”) may ultimately be detrimental as plans are very likely to need to change as the utilities and the Commission develop a greater understanding of wildfire risks and effective mitigations. The Legislature balanced the need for longer term planning with an understanding that planning beyond a three-year cycle may be too speculative and subject to significant change.

---

<sup>9</sup> Cal. Public Utilities Code § 8386(b). PG&E further notes that the predecessor legislative action, Senate Bill (SB) 901, focused on annual Wildfire Mitigation Plans.

Guidance-12 is legally erroneous because it effectively turns the three-year planning horizon envisioned by the Legislature into a ten-year planning horizon by requiring detailed ten-year plans. In addition to this legal error, Guidance-12 may have adverse impacts. If, for example, a utility has a ten-year plan for a specific program but determines several years into the program that it is not as effective as expected, the utility may be hesitant to change its programs because it is concerned about being criticized for not following through with its stated ten-year plan. Further, technological developments may significantly alter the activities, investment plans or timelines of utilities well before the end of a ten-year planning cycle. A three-year planning horizon provides greater flexibility to make prudent changes as the utilities, Commission, and stakeholders gain further experience with wildfire risk mitigation and programs.

Finally, a ten-year planning horizon may give a false sense of clarity or certainty. The Commission need only look at the last ten years as an example. In 2010, the wildfire risk in California was not clear. For example, in a 2012 decision regarding regulations to reduce fire hazards, the Commission imposed more stringent inspection requirements on utilities located in Southern California, explaining that:

We also conclude that patrol inspections every two years, and detailed inspections every ten years, is sufficient for CIP facilities located in the high fire-threat areas of Northern California. There is no history of catastrophic power-line fires in Northern California, and Northern California does not experience Santa Ana winds that contribute significantly to the risk of catastrophic power-line fires in Southern California. Therefore, because the overall risk of power-line fires is lower in Northern California, we can safely reduce the frequency (and associated cost) of inspections.<sup>10</sup>

Clearly, much has changed in the eight years since this decision was issued. Given the dynamic nature of wildfires and wildfire risk, the Commission and stakeholders will be better served using the three-year planning horizon envisioned in AB 1054 rather than a ten-year planning horizon.

## **B. Draft Resolution WSD-003 (PG&E-Specific Resolution)**

### **1. Condition PGE-1 (Initiatives)**

Condition PGE-1 addresses the issue of the generic initiatives identified in the 2020 WMP Guidelines. As PG&E explained above, these generic initiatives did not consider that utilities may have developed their own specific programs which combine multiple initiatives and sub-initiatives and do not include separate tracking or funding. This is certainly the case for

---

<sup>10</sup> D.12-01-032, p. 74.



PG&E. The factual errors underlining Condition PGE-1 are described above in Section A.1 and proposed revisions to modify this error are provided in Attachment A.

**2. Condition PGE-2 (Equipment Caused Ignitions)**

Condition PGE-2 subpart (i) requires PG&E to explain why the number of fire ignitions caused by its equipment are higher than equipment-caused ignitions for other utilities. PG&E does not oppose including information explaining how its equipment has caused ignitions. However, PG&E has no means by which to compare itself with other utilities in this kind of detailed fashion. PG&E does not have access to other utilities' detailed equipment and maintenance records so that it can perform such a comparison. Doing such a comparison would purely be speculation without having access to each utilities' underlying equipment data (or be largely reliant on the data that is publicly available to many parties but may be incomplete or not sufficiently detailed). Subpart (i) is factually erroneous because it assumes that has access to all of the information necessary for PG&E to perform such a comparison. To remedy this error, PG&E has proposed minor revisions to subpart (i) in Attachment A.

**3. Condition PGE-11 (Internal and Federal Monitor Materials)**

Condition PGE-11 requires PG&E to provide certain materials that are developed internally for PG&E leadership and the Board of Directors, as well as materials provided to the Federal Monitor. PG&E does not oppose this Condition, but it is factually erroneous because the scope and time period are unclear, and it is legally erroneous to the extent that it is requesting privileged information or information beyond the scope of this proceeding.

First, Condition PGE-11 should be clarified to state that the materials are related to wildfires and wildfire risks. While this is implied from the reference to PG&E's 2020 WMP, language should be added to Condition PGE-11 to make the scope clear. This is especially true for the request for reports provided to the Federal Monitor. It would be legally erroneous to require in this proceeding reports to the Federal Monitor that have nothing to do with wildfires. PG&E understands that WSD's intent was to limit this to wildfire-related materials and so is proposing limited changes to affirm that understanding.

Second, the time period of materials to be provided is not clear. Since this is a Class B condition, and the first Class B Quarterly Report will not be provided until September 2020, PG&E assumes this is only seeking materials created after ratification of the 2020 WMP. However, this should be clarified in Condition PGE-11.

Finally, Condition PGE-11 should be clarified to state that it only applies to materials that are not protected by the attorney-client and attorney work product privileges. There is well-established precedent in California that the Commission cannot compel the disclosure of

privileged materials<sup>11</sup> and thus Condition PGE-11 would be legally erroneous if it was read to be requiring disclosure of these types of materials.

PG&E has proposed revisions to Condition PGE-11 in Attachment A to address these three issues.

**4. Condition PGE-25 (PG&E and Contractor Employee background Information)**

Conditions Guidance-11 and PGE-25, which primarily include the same language, address recruiting and hiring of employees for vegetation work. Utilities must have sufficient workforce to perform wildfire risk reduction work and therefore PG&E does not oppose the goal of this Condition. However, some of the information requested may be confidential information regarding PG&E employees or the employees of PG&E contractors. Further, much of this material may be unavailable to PG&E. This aspect of Conditions Guidance-11 and PGE-25 is legally and factually erroneous and should be deleted. Specifically, Subpart (iii) requires PG&E to provide “metrics to track the percentage of recruits that are newly trained, percentage from out of state, and the percentage that were working for another California utility immediately prior to being engaged by PG&E.”<sup>12</sup> Information about an individual’s previous employment and residence may be ambiguous and may not be available to PG&E, especially for employees of contractors that are hired to perform vegetation management work. Further, information regarding previous employment and residency may be confidential such that a contractor or even PG&E cannot and should not gather or disclose this information. Finally, it is not clear that gathering this information would materially drive better operations or understanding across WMP stakeholders. While we generally agree with providing details about our approaches to ensuring an adequate workforce to deliver on WMP targets and providing information on the overall workforce, personal information about individuals whom we hire or retain through a contractor should not be disclosed.

**5. Condition PGE-27 (Communications With External Parties)**

Condition PGE-27 addresses communications with public safety partners, such as cities, counties, and first responders. PG&E generally supports this Condition but some of the information requested may raise privacy concerns and thus is legally erroneous. In addition, this information will be burdensome to gather. Specifically, subpart (iii) states that in its Quarterly Filings, PG&E shall “[p]rovide a list of every PG&E contact and their counterparts and the cities, counties and first responder entities and description of their interaction.”

First, providing the names of counterparts at cities, counties, and first responder entities

---

<sup>11</sup> *S. Cal. Gas v. Public Utilities Commission*, 50 Cal.3d 31, 38-39 (1990).

<sup>12</sup> Draft Resolution WSD-003, p. 61.

may raise privacy concerns. These individuals may not want to be identified by name in a public filing. To address this error, PG&E is proposing to revise Condition PGE-11 to state the name of the city, county, or first responder agency, not the individual.

Second, PG&E works with 47 counties and over 300 cities, as well as numerous first responder entities. Providing a description of each interaction with each such entity on a quarterly basis would be time consuming and burdensome. Over a quarter, there may be hundreds or thousands of interactions. Describing each seems to be an unnecessary burden with little benefit. To correct this error, PG&E is proposing revisions to eliminate the requirement that all interactions be described.

### **C. Conditional Approval**

Draft Resolution WSD-003 conditionally approves PG&E's 2020 WMP. Draft Resolution WSD-002 explains that conditional approval "of a WMP identifies each missing or inadequate element in the WMP and requires specific action to remedy the problem according to particular timelines."<sup>13</sup> This aspect of the Draft Resolutions is legally erroneous but can be easily remedied.

Utility WMP approval is critical so each utility can obtain the safety certification created in AB 1054.<sup>14</sup> PG&E understands and supports the intent of the Draft Resolutions that any shortcomings in the 2020 WMPs are identified, addressed and remedied. However, the use of the term "conditional approval" will create ambiguity as to whether a utility's 2020 WMP has actually been approved and whether the Commission's Executive Director can issue the necessary safety certificate. To address the legal error created by using language that is not included in California statutory law and to provide the Commission and parties with clarity, Draft Resolution WSD-002 should be revised to state that conditional approval is "approval" for purposes of Public Utilities Code section 8389(e)(1). PG&E offers specific language to remedy this error in Attachment A.

### **D. Conclusion**

PG&E fully supports the efforts of the WSD and believes that the 2020 WMPs represent a substantial step forward for all of the utilities in describing their respective plans to address wildfire risks in California. PG&E believes that, in general, the Draft Resolutions provide a substantive and thorough review of the 2020 WMPs. However, these Draft Resolutions contain factual and legal errors that need to be corrected. Proposed corrections are described above and specific text is provided in Attachment A. The Commission should incorporate these changes into the final Resolutions. In addition, PG&E recommends that the WSD begin regular and

---

<sup>13</sup> Draft Resolution WSD-002, Finding 8.

<sup>14</sup> Cal. Public Util. Code § 8389(e)(1).

Caroline Thomas Jacobs, Director  
Wildfire Safety Division  
May 27, 2020  
Page 12

ongoing collaborative discussions with stakeholders, including the utilities, ideally starting in June 2020, regarding the WSD's data needs, format and desired outcomes.

Sincerely,



Matthew Pender

Director, Electric Operations Regulatory Strategy & Community Wildfire Safety Program PMO  
77 Beale Street, 28th Floor  
San Francisco, CA 94105  
(415) 973-3604  
[Matthew.Pender@pge.com](mailto:Matthew.Pender@pge.com)

Cc: R.18-10-007 service list

## Attachment A

### Proposed Modifications to Draft Resolutions WSD-002 and WSD-003

Below PG&E provides proposed revisions in Draft Resolutions WSD-002 and WSD-003 to correct factual and legal errors. The language below is taken from the Draft Resolutions and strikethroughs represent proposed deletions while underlining communicates proposed additions.

#### **Draft Resolution WSD-002:**

**Condition (Guidance-1, Class B):** In its first quarterly report, each electrical corporation shall provide the following:

- i) Its calculated ~~reduction in ignition risk for risk mitigation impact~~ reduction in ignition risk for risk mitigation impact using the S-MAP methodology for each initiative (or combination of associated initiatives that are managed together) that directly impacts risk in its 2020 WMP;
- ii) ~~Its calculated reduction in wildfire consequence risk for each initiative in its 2020 WMP; and~~
- iii) ~~The risk models used to calculate (i) and (ii) above.~~

[Alternatively, Guidance-1 should be identified as Class C]

**Condition (Guidance-2, Class B):** In its first quarterly report, each electrical corporation shall provide the following:

- i) All alternatives considered for ~~those each~~ those each grid hardening or vegetation management initiatives (or combination of associated initiatives that are managed together) where alternatives were evaluated in the development of ~~in~~ its 2020 WMP;
- ii) All tools, models, and other resources used to compare alternative initiatives;
- iii) How it quantified and determined the risk reduction benefits of each initiative (or combination of associated initiatives that are managed together); and
- iv) Why it chose to implement each initiative (or combination of associated initiatives that are managed together) over alternative options.

**Condition (Guidance-3, Class A):** Each electrical corporation shall submit in its remedial correction plan (RCP) the following:

- i) How it intends to apply risk modeling and risk assessment techniques to each initiative (or combination of associated initiatives that are managed together) in its WMP, with an emphasis on much more targeted use of asset management, vegetation management, grid hardening and PSPS based on wildfire risk modeling outputs;
- ii) Identify all wildfire risk analyses it currently performs (including probability and consequence modeling) to determine which mitigation is targeted to circuits and assets

where initiatives (or combination of associated initiatives that are managed together) will provide the greatest benefit to wildfire risk reduction;

iii) A timeline to leverage its risk modeling outputs to prioritize and target initiatives (or combination of associated initiatives that are managed together) and set PSPS thresholds, including at least asset management, grid operations, vegetation management, and system hardening initiatives;

iv) How it intends to incorporate future improvements in risk modeling into initiative prioritization and targeting processes (or combination of associated initiatives that are managed together); and

v) How it intends to adapt its approach based on learnings going forward.

**Condition (Guidance-5, Class B):** In its first quarterly report, each electrical corporation shall:

i) Break out its programs outlined in section 5.3 into individual initiatives (or combination of associated initiatives that are managed together);

ii) Report its spend on each individual initiative (or combination of associated initiatives that are managed together);

iii) Describe the effectiveness of each initiative (or combination of associated initiatives that are managed together) at reducing ignition probability or wildfire consequence;

iv) List all data and metrics used to evaluate effectiveness described in (iii), including the threshold values used to differentiate between effective and ineffective initiatives; and

v) Provide the information required for each initiative (or combination of associated initiatives that are managed together) in section 5.3 of the Guidelines.

If an electrical corporation does not have the relevant data for each initiative (or combination of associated initiatives that are managed together), it shall: i) explain the difference between what it reports and what the WMP Guidelines require, ii) explain why it cannot meet the WMP Guidelines, and iii) develop a plan to obtain and share the relevant initiative information at the initiative level (or combination of associated initiatives that are managed together) rather than the program level, including a timeline of when such information will be provided.

**Condition (Guidance-6, Class B):** In its first quarterly report, each electrical corporation shall:

i) Clearly identify each initiative (or combination of associated initiatives that are managed together) in Section 5.3 of its WMP as “Standard Operations” or “Augmented Wildfire Operations;”

ii) Report WMP required data for all Standard Operations and Augmented Wildfire Operations;

iii) Confirm that it is budgeting and accounting for WMP activity of each initiative (or combination of associated initiatives that are managed together); ~~and~~

~~iv) Include a “ledger” of all subaccounts that show a breakdown by initiative.~~

**Condition (Guidance-9, Class B):** In its quarterly report, each electrical corporation shall detail:

i) All pilot programs or demonstrations identified in its WMP;

ii) Status of the pilot, including where pilots have been initiated and whether the pilot is progressing toward broader adoption; and,

~~iii) Results of the pilot, including quantitative performance metrics and quantitative risk reduction benefits; and~~

~~iv) A proposal for how to expand use of the technology if it reduces ignition risk materially.~~

In addition to this quarterly reporting, on an annual basis, post-pilot reporting in a utility’s next WMP explaining all the pilots completed in the prior year and conclusions or information learned from these pilots.

**Condition (Guidance-10, Class B):** Electrical corporations shall collaborate with the WSD to establish a ensure that all future data submissions to the WSD adhere to the forthcoming data taxonomy and schema to effectively and consistently report GIS data currently being developed by the WSD. Additionally, each electrical corporation shall file a quarterly report providing that detail:

i) Locations where grid hardening, vegetation management, and asset inspections were completed over the prior reporting period, clearly identifying each initiative and supported with GIS data;

ii) The type of hardening, vegetation management and asset inspection work done, and the number of circuit miles covered, supported with GIS data;

iii) The analysis that led it to target that specific area and hardening, vegetation management or asset inspection initiative; and

iv) Hardening, vegetation management, and asset inspection work scheduled for the following reporting period, with the detail in (i) – (iii).

**Condition (Guidance-11, Class B):** In its first quarterly report, each electrical corporation shall detail:

i) A listing and description of its programs for recruitment and training of vegetation management personnel, ~~including for vegetation management;~~

- ii) A description of its strategy for direct recruiting and indirect recruiting via contractors and subcontractors; and
- iii) Its metrics to track the effectiveness of its recruiting programs, ~~including metrics to track the percentage of recruits that are newly trained, percentage from out of state, and the percentage that were working for another California utility immediately prior to being hired.~~

**Condition (Guidance-12, Class B):** In their first quarterly report, each electrical corporations shall detail:

- i) Its expected state of wildfire mitigation in ~~10~~3 years, including 1) a description of wildfire mitigation capabilities in ~~10~~3 years, 2) a description of its grid architecture, lines, and equipment;
- ii) A year-by-year timeline for reaching these goals;
- iii) A list of activities that will be required to achieve this end goal; and
- iv) A description of how the electrical corporation's ~~three year~~ WMP is a step on the way to this ~~10 year~~ goal.

**Finding No. 8:**

A conditional approval of a WMP identifies each missing or inadequate element in the WMP and requires specific action to remedy the problem according to particular timelines. For purposes of California Public Utilities Code Section 8389(e)(1), a conditional approval is approval. The 2020 WMP Resolutions for each electrical corporation contain a set of “Deficiencies” and associated “Conditions” to remedy those deficiencies. Each deficiency is categorized into one of the following categories, with Class A being the most serious:

- Class A – aspects of the WMP are lacking or flawed;
- Class B – insufficient detail or justification provided in WMP;
- Class C – gaps in baseline or historical data, as required in 2020 WMP Guidelines.

**Draft Resolution WSD-003:**

**Condition (PGE-1, Class A):** In addition to the requirements of the relevant Condition in the Guidance Resolution, PG&E shall develop and furnish an RCP that includes:

- i. A detailed break-down of its programs outlined in section 5.3 into individual initiatives (or combination of associated initiatives that are managed together), reporting planned spend on each individual initiative (or combination of associated initiatives that are



managed together), describing the effectiveness of each initiative (or combination of associated initiatives that are managed together) at reducing ignition risk, outlining outcomes (including providing results of detailed, patrol, and other inspections individually in Table 1, as required in the WMP Guidelines), and providing the information required for each initiative (or combination of associated initiatives that are managed together) as required in Section 5.3 of the Guidelines; and

ii. If PG&E does not have the relevant data in its possession at the initiative level, it shall 1) explain the difference between what it reports and what the WMP Guidelines require, 2) explain why it cannot meet the WMP Guidelines, and 3) develop a plan including a detailed timeline to obtain and share the required information at the initiative (or combination of associated initiatives that are managed together) level rather than the program level.

**Condition (PGE-2, Class B):** In its first quarterly report, PG&E shall:

i. Explain why its equipment failure rate is so high ~~compared to other large electrical corporations;~~

ii. Explain how it expects grid hardening, asset management and other initiatives affect the probability of 1) near misses and 2) ignitions; and

iii. Address whether its prior maintenance history is causing higher rates of equipment failure now, and PG&E shall include in this report all places where a court or other decision making body found fault with PG&E's historical equipment maintenance, either with regard to individual assets or its maintenance policies as a whole.

**Condition (PGE-11, Class B):** In its quarterly reports, PG&E shall append the following:

i) All non-privileged internal reports provided to its leadership, related to wildfires and wildfire mitigation as described in Section 5.2A of its 2020 WMP, during the ~~previous quarter starting from the ratification of this Resolution;~~ and

ii) All reports, as described in Section 5.2A of its 2020 WMP, it made to the federal monitor in the previous quarter.

**Condition (PGE-25, Class A):** PG&E shall develop and furnish an RCP that includes:

i) A description of its recruitment and training for vegetation management talent and how it plans to address this constraining factor in scaling its vegetation management programs;

ii) A description of its strategy for direct recruiting and indirect recruiting via contractors and subcontractors; and

iii) Provide metrics to track the effectiveness of its recruiting programs, ~~including metrics to track the percentage of recruits that are newly trained, percentage from out of state,~~

~~and the percentage that were working for another California utility immediately prior to being engaged by PG&E.~~

**Condition (PGE-27, Class B):** In its quarterly report, PG&E shall:

- i) Provide an updated “coordination with public safety partners” plan that details precisely how PG&E works with cities, counties, incident management teams, and other first responders;
- ii) Include the experience level of its employees that conduct the interaction in emergency management or other public safety functions;
- iii) Provide a list of every PG&E contact and ~~their counterparts~~ and the cities, counties and first responder entities they have interacted with and ~~description of their interaction~~;
- iv) Detail its process for logging all complaints by PG&E employees or their public sector counterparts about poor or problematic interactions between PG&E and their counterparts;
- v) Provide a description of all complaints logged to date that meet the criteria in (iv); and
- vi) Provide a description of how PG&E surveys public safety partners to ensure its interactions are constructive and useful.