BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Wildfire Safety Division
California Public Utility Commission

COMMENTS OF THE GREEN POWER INSTITUTE ON THE DECEMBER QUARTERLY REPORTS ON THE 2020 WMPS

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Pursuant to the November 30, 2020, Resolution WSD-011, the Green Power Institute, the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security (GPI), provides these *Comments of the Green Power Institute on the December Quarterly Reports on the 2020 WMPs*.

General Comments

GPI reviewed December reports submitted by PG&E, SCE, SDG&E, Liberty, and PacifiCorp. BVES was not required to file a quarterly update regarding class B deficiencies on the basis of their WMP Refile and Draft Resolution WSD-013. Each report provides updates with varying degrees of detail regarding Utility progress towards remedying Class B Deficiencies established in WSD-002, WSD-003 WSD-004, WSD-005, WSD-006, and WSD-008.

SCE - SCE provides a reasonably thorough update on SCE-5 Deficiency: "Detailed timeline of WRRM implementation not provided." Progress towards developing, running, and applying the WRRM model to guide wildfire mitigation strategy appears to be on track. We are particularly interested in the capabilities of the WRRM to analyze wildfire risk and consequence at the asset level that can be aggregated at the circuit, circuit-segment, or other granularities. We look forward to future updates regarding model production, testing, and application. As described, SCE's WRRM and model application vision appears to be one of the most advanced wildfire risk models that is capable of granular risk assessment at the circuit level. They include plans to run the model on an annual or semi-annual basis. GPI is cautiously optimistic about the ability of the model to inform targeted, circuit-level mitigation efforts that increase WMP efficiency and impact. However, we are curious about the computing power required to run the asset-level WRRM, and whether SCE is preforming analyses on all assets in Tier 3 and Tier 2 HTFD

zones, WUI, or territory wide. We look forward to future updates regarding WRRM model progress, implementation, and application.

GPI recommends SCE and other Utilities with similarly advanced wildfire risk models provide a demonstration of model capabilities, outputs and how the outputs are used to inform wildfire risk mitigation strategies, especially granular (e.g. asset and circuit-level) initiative prioritization decision making. These demonstrations will provide the WSD, WSAB, stakeholders, intervenors, and other utilities a more complete understanding of model capability and application. They will inform guidance regarding WMP best-practices going forward. Utility wildfire risk model demonstrations should take place in 2021 and/or 2022, prior to the next 3-year WMP filing cycle. These demonstrations should take the form of public workshops to maximize transparency.

PacifiCorp – PacifiCorp provides responses to Guidance-3: "Lack of risk modeling to inform decision making," Guidance-1: "Lack of Risk Spend efficiency Information," and Gudance-2: "Lack of alternative analysis for chosen alternatives." They explain that their strategy for all three guidance items relies on first addressing Guidance-3, risk-modelling, in order to inform more granular risk-spend efficiencies (Guidance-1), and subsequently enable alternative analyses (Guidance-3). However, their progress towards achieving guidance 3 is generalized. The plan includes

> …developing a new, more granular and Localized Wildfire Risk Assessment used to calculate specific risk scores for individual sections of circuits (Localized Wildfire Risk Assessment). PacifiCorp has made considerable progress and is on track to produce results of the Localized Wildfire Risk Assessment in the near term (PacifiCorp December 2020 Quarter Report, p. 3).

> …Through development of the Localized Wildfire Risk Assessment and experimentation with its inputs, PacifiCorp has, since submitting the RCP, incorporated a new strategy to make the assessment modeling even more granular and localized.

Based on their description it is difficult to assess exactly what the "Localized Wildfire Risk Assessment" tests, what the inputs are, what the outputs are, and the basis on which "individual sections of circuits" are tested (e.g. ignition risk at the asset level, assets

evaluated?). The proposal for a "near-term" timeline regarding model results is also vague. They also indicate having:

> identified 2,713 individual zones of protection in its California service territory, served by just under 100 distribution circuits. Using the risk assessment methodology described in the RCP, PacifiCorp will calculate a risk assessment score for each individual zone of protection.

This level of granularity sounds promising, yet it remains unclear how the model defines a "zone of protection." We therefore reiterate our recommendation that utilities, including PacifiCorp, host public workshops that present their wildfire risk models, model inputs and outputs, and applications in the WMP. A demonstration of this type will improve WSD, WSAB, stakeholder and public understanding of PacifiCorp's proposed "Localized Wildfire Risk Assessment" model and approach.

In general, the vague description of PacifiCorp's wildfire risk model in response to Complaince-3 throws into question their ability to make progress towards achieving guidance-1 and -2 in the coming year. GPI is concerned that failure to develop RSEs and methods for assessing wildfire mitigation alternatives, even at a coarser level of granularity, by the 2021 WMP Update may set PacificCorp behind in terms of their overall ability to select and prioritize mitigation strategies that lead to effective and efficient wildfire mitigation outcomes. We look forward to future updates regarding model progress and progress towards Guidance-1, 2 and 3.

SDG&E – In their response to Guidance-9 "Insufficient Discussion of Pilot Programs," SDG&E describes a LiDAR pilot program for vegetation management activities. Regarding LiDAR findings, SDG&E states that "If clearance issues were identified, they would be resolved per the normal vegetation inspection and follow up trim process (SDG&E December 2020 WMP Quarter Report, p. 12)." SDG&E should clarify if this statement means that vegetation clearance issues identified by LiDAR are not mitigated on a schedule related to when the issue is identified, but rather addressed during the existing inspection and mitigation schedule. If LiDAR-identified issues are managed during the standard inspection schedule, there may be minimal value in preforming the

LiDAR to begin with. Presumably these same clearance infractions would be identified during the regular inspection and the issue would be remedied on the same timeline with or without the LiDAR assessment.

Along these same lines, SDG&E also indicates a limited QA/QC application for LiDAR vegetation surveys and clearance issue identification:

> Based on the current progress of this pilot, SDG&E is seeing potential use cases as a QA/QC tool for vegetation management inspections. Pending changes to the LiDAR analysis techniques to accurately distinguish between primary and secondary lines, this pilot could be expanded for use as a QA/QC tool on vegetation management inspections (SDG&E December 2020 WMP Quarter Report, p. 12).

SDG&E should clarify why LiDAR surveys are constrained to a QA/QC use case for Vegetation management inspections versus a more proactive use case to identify and remedy vegetation clearance issues in addition to traditional inspection programs. In a QA/QC capacity, LiDAR is limited to providing duplicative "inspection services" that merely vet existing inspection methods and do not actively lead to remediating the vegetation clearance issues it identifies. Alternative, SDG&E should explain whether LiDAR surveys can serve as a vegetation inspection tool in addition to existing inspections methods. An alternative vegetation inspection use case for LiDAR surveys may improve inspection efficiency and efficacy, and may even provide inspection benefits in regions with challenging terrain or reduce the need for other types of inspections (e.g. foot patrols).

SDG&E also describes a fuels management program that entails grant awards to fund third party fuels management projects. They do not, however, describe who the funds were awarded to, or the awarded project scope, including aspects such as project goals, planned scope of work, outputs, outcomes, location, disposition of residues, or acres affected. SDG&E should provide complete details regarding the fuel-load projects selected for funding, including the managing organizations, project scope, goals, outputs, outcomes, and associated evaluation metrics.

PG&E – PG&E provided an update regarding Deficiency PGE-23: vegetation waste and fuel management process unclear. Under their description of the Transmission Utility Defensible Space (UDS) Pilot, they indicate pilot location selection based on PSPS risk:

> The criteria for selection are those poles or towers on transmission lines in HFTD Tier 2 and 3 areas that could remain energized during PSPS events. The first areas selected for treatment have been cleared through PSPS tree -risk reduction or ROW expansion work (PG&E December 2020 WMP Quarter Report, p. 25).

However, section iv. regarding the effectiveness of various treatments provides no mention of PSPS reduction. While we understand that the Transmission UDS program is in the pilot phase, we look forward to additional insight in future reports regarding whether it or other vegetation management programs can reduce the need for PSPS.

In response to section v. regarding fuel reduction programs and land management entities (e.g. USFS), PG&E states: "In coming meetings, we will look at clarifying the process for disposition/treatment of felled trees (e.g., timber sale, lop and scatter, chipping) (PG&E December 2020 WMP Quarter Report, p. 12)." The sheer amount of usable biomass produced from standard and new "enhanced" hazard tree and vegetation management (VM) activities suggest an untapped, potential revenue stream that may even support expanded fuel reduction programs. End uses for these VM residues include lumber, pellet and particle board production and biomass generation, among other options. In future Quarter Reports PG&E should provide a detailed account of all VM residue pathways considered, as well as describe if and why particular products or treatments were selected over others.

Conclusions

While progress is apparent, the December 2020 MWP Quarter Reports also continue to reveal gaps in Utility planning and capabilities. We look forward to additional information on the granular and quantitative wildfire risk and consequence models under development, and their ability to improve WMP activity selection and prioritization. Model demonstration workshops in the coming years would improve stakeholder and

public understanding of the modeling tools, their inputs, outputs and ability to inform wildfire mitigation plans going forward.

We urge the Commission to adopt GPI's proposed recommendations for the reasons stated above.

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Respectfully Submitted,

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