

Matthew Pender

Mailing Address
P.O. Box 7442
San Francisco, CA 94120

Street/Courier Address
77 Beale Street, 28th Floor
San Francisco, CA 94105

(415) 973-3604
Email: matthew.pender@pge.com

January 12, 2021

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 Reply to Comments Received On
Quarterly Report on Class B Conditions Submitted on December 9, 2020**

Dear Ms. Jacobs:

Pacific Gas and Electric Company (PG&E) respectfully submits this reply to the comments submitted by the Green Power Institute (GPI) and Mussey Grade Road Alliance (MGRA) regarding PG&E's Quarterly Report submitted on December 9, 2020, for the 3rd Quarter of 2020 (Q3 2020 Quarterly Report). The Q3 2020 Quarterly Report addressed six Class B Conditions that had been identified in Commission Resolutions WSD-002 and WSD-003. In this reply, PG&E addresses each of the issues raised by GPI and MGRA.

Issues Raised by GPI

GPI raises three issues regarding the Q3 2020 Quarterly Report. First, GPI recommends that all of the utilities, including PG&E, provide a demonstration of their risk modeling abilities.¹ PG&E does not oppose public workshops conducted by WSD where the utilities can discuss their approaches to wildfire risk modeling. However, the utilities may only be able to do so much at these workshops, as producing model outputs during the workshop, as GPI suggests, may not be feasible in a workshop setting. PG&E fully supports an appropriately scoped workshop regarding modeling.

Second, GPI asks for additional information as to whether PG&E's Transmission Utility Defensible Space (UDS) Program has the additional benefit of reducing the scope of Public

¹ GPI Comments, p. 2.

Safety Power Shutoff (PSPS) events.² As GPI recognizes, at this point the Transmission UDS program is a pilot program and, as PG&E explained, is currently undergoing environmental review.³ The extent to which this program can have some additional beneficial impacts on PSPS is yet to be determined. However, this will be an issue that PG&E will evaluate as the program moves forward.

Finally, GPI asks for additional information regarding meetings between PG&E and the United States Forest Service (USFS), as well as PG&E's plans to address vegetation management residue (*i.e.*, felled trees, etc.).⁴ PG&E intends to continue discussions with the USFS and other entities regarding fuel reduction and vegetation management residue and will continue reporting on these efforts through the Wildfire Mitigation Plan (WMP) process and in other venues.

Issues Raised By MGRA

MGRA raises two issues concerning PG&E's Q3 2020 Quarterly Report. First, MGRA makes specific comments on the pilot program information provided by Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E).⁵ MGRA does not identify any concerns about PG&E's information regarding our pilot programs, but does suggest that all of the utilities provide information about the testing, validation, and deployment of pilot program technology.⁶ PG&E's submission appears to have addressed MGRA's concerns because it included information regarding the location for testing, the results to date, evaluation of the technology using certain performance metrics, methods to incorporate the technology into operational practices, anticipated use of the technology, and anticipated locations should the technology be proven to be successful and subsequently put into production.⁷ Thus, for PG&E, MGRA's concerns have already been addressed.

Second, MGRA asks that PG&E provide additional data regarding its wildfire satellite detection program.⁸ The Q3 2020 Quarterly Report already provided a substantial amount of detailed information regarding this pilot program, which is one of more than 20 pilot programs that PG&E is pursuing. If MGRA wants more specific information about this program, it can send a data request seeking the specific information. MGRA's request that the WSD direct PG&E to produce more information on this pilot program, presumably in a future Quarterly Report, is not necessary.

² GPI Comments, p. 5.

³ Q3 2020 Quarterly Report, p. 25.

⁴ GPI Comments, p. 5.

⁵ MGRA Comments, pp. 2-3.

⁶ MGRA Comments, p. 4.

⁷ Q3 2020 Quarterly Report, pp. 4-6.

⁸ MGRA Comments, p. 5.

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Conclusion

PG&E appreciates the opportunity to provide these reply comments and the ongoing engagement of parties such as GPI and MGRA in the WMP process.

Sincerely,

/s/ Matthew Pender

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

cc: R.18-10-007 service list