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Dear Wildfire Safety Advisory Board:

Re: **PG&E's Comments on the Wildfire Safety Advisory Board's Recommendations on the 2020 Utility Wildfire Mitigation Plans**

I. INTRODUCTION

PG&E greatly appreciates the thoughtful engagement of the Wildfire Safety Advisory Board (Board) in providing these recommendations on the future of the Wildfire Mitigation Plan process specifically and supporting the overarching goal that PG&E, the Board, and all parties share of eliminating catastrophic wildfires associated with utility equipment.

PG&E notes and agrees with the Board's direction that "these recommendations be considered additive guidance in consideration of the 2021 WMPs currently under development."¹ Related to that direction PG&E suggests that the Board may have a valuable perspective on the timeline for the 2021 (and future) WMP processes. Many of these recommendations relate to utilities providing additional data, plans or details. Doing so requires adequate lead time for the utilities to understand what is being required, including the templates or format expected, and gather the information in advance of the WMP filing date. Ensuring adequate time from when the 2021 WMP templates and requirements are finalized to the WMP filing date will best enable utilities to provide the most complete and consistent data possible. This will also allow for the most efficient and effective review of those plans during the post-filing review period.

PG&E also commends the Board on the format and delivery of these recommendation in a direct and clear way that was easy to read and understand. PG&E's remaining comments are organized around the eleven recommendations provided by the Board and in a similarly bullet point oriented format.

PG&E's Comments in Relation to the Board's April 3rd Recommendations:

1. Developing and Tracking Community Engagement Activities

- A. PG&E is aligned with the Board's overall recommendation here, however PG&E notes that there are multiple ongoing and overlapping proceedings before the CPUC² that all

¹ Board recommendations page 2

² Some of the ongoing wildfire and PSPS related proceedings include: PSPS OIR R.18-12-005; PSPS OII I.19-11-013; WMP R.18-10-007 (2020 process and 2019 Phase 2 decision); Microgrid OIR R.19-09-009; and PG&E's General Rate Case.

delve into this topic area of how customers and communities are engaged and supported regarding wildfire and PSPS activities. All stakeholders would benefit if the CPUC consolidated these issues into one proceeding instead of getting various guidance from different proceedings.

- B. The various proceedings that are now touching on this space all evolved organically but now may be the time for the Board and the CPUC to reassess and determine the appropriate scope, and limitations, of each proceeding to avoid duplication and confusion and improve efficiency and speed.

2. Working with Local Government Liaisons in Emergency Situations

- A. PG&E is completely aligned with the Board’s focus on the importance of strong alignment between utilities and local governments and first responders.
- B. It is worth noting, however, that the scope and scale of different utility footprints are considerable. PG&E has 47 different counties, plus numerous tribes, in its service territory, which each include multiple local governments. Therefore, logistical considerations must be incorporated with regard to the observation that “[i]mpacted county or local government liaisons should be integrated in the EOC...”. PG&E has outlined a plan to provide a Single Point of Contact for County OES in advance of and during PSPS events that we believe addresses the goal of this recommendation.

3. Sharing Developing Science and Situational Awareness Data

- A. PG&E understands and agrees with the philosophical approach that improvements are more likely if a larger and more diverse group of people is looking at these challenges and the associated data.
- B. PG&E does recognize that good ideas and insights sometimes come from different angles and just because someone (say a lineman) does not have a certain degree they may still have very relevant ideas, input or experience to contribute to some of these analyses and decision making.
- C. Consideration must be given to the challenges in broadly sharing all data, analysis, models and code associated with understanding wildfire risk:
 - a. The recommendation does note “federal critical infrastructure protection protocols” which is one such challenge.
 - b. Commercial realities – if all models, code or other products the utilities use or consider must immediately be uploaded to a publicly available “portal, system, or facility” there are a number of vendors or experts who may not be willing to consult with or develop models for utility wildfire efforts. Some models and information provided by third parties may include trade secrets such that the third

party is unwilling to make it publicly available. While PG&E fully supports making as much data publicly available as possible, there are practical considerations that will need to be worked through.

- D. Given the significant scope of this proposal, PG&E would be interested to understand who would manage and lead such a system. In the opening comments the Board mentions that for a similar concept on centralized data collection, “The University of California might be the appropriate home for such a repository provided that utilities submit updated data...” That may (or may not) be an appropriate solution for leading and managing a centralized wildfire risk model repository if this were to be pursued.
- E. While aspects of this recommendation certainly sound promising in providing benefits, the logistical challenges appear to be considerable. Much thought needs to be put into how this can be feasibly, successfully, cost-effectively implemented in a manner that continues to incent innovation, exploration and partnership.

4. Future Proofing Utility Pilots and Aligning Pilots with Climate Goals

- A. Pilots are specifically designed for utilities and others to explore or test something uncertain where it is not clear what the outcomes will be or truly how long a pilot will take. Pilots often require that utilities stop, rework, adjust or redirect efforts as results or challenges become apparent. Therefore, requiring utilities to commit to specific implementation timelines for emerging technologies may not be appropriate, and may actually be detrimental, for incenting the flexible, innovative exploration of evaluating new or unproven technologies.
- B. Seeking thorough details up front (before pilots have begun) to allow regulators to "judge the expected effectiveness of the pilots" may not be possible - the whole point of pilots is to figure out the expected effectiveness of a tool or technology. Further, some pilots will fail or will not be effective, which is to be expected. PG&E would offer that if we do not explore some ideas that do not end up working out then we may not be trying out enough things.
- C. In addition, transparency regarding the costs of emerging technology pilots may prevent counterparties from participating if they know all details of their pricing and development costs will be made publicly available.
- D. In the scheme of utility investments associated with WMPs, the total investment in technology pilots is relatively small. Anything that may put more hurdles on the ability to explore and pilot new technologies or ideas may not be constructive in supporting the long-term goal of finding solutions to meaningfully reduce the risk of catastrophic wildfire in our State.
- E. Utilities need flexibility to explore new technologies and evaluate them through an iterative process. We are very open to information sharing about technology evaluation

efforts particularly as information becomes available, but PG&E respectfully submits that focusing on "implementation plans" and "judging effectiveness" of technology pilots before they occur is not the right place to put our collective effort or emphasis.

5. Fuel Management, Removal of At-Risk Species, and Scientific Review

- A. PG&E is aligned with the Board that further analysis and scientific review would benefit all parties as it relates to ecological changes occurring in California's forests due to climate change and how those ecological changes are further influenced by utility vegetation management activities.
- B. PG&E respectfully asks if increasing fuel moisture retention should be the purview of the utility? Utilities obviously do not own much of the land on which their assets sit or cross – this land is generally privately, state or federally owned. The efficacy, feasibility, cost implications and environmental factors associated with establishing gray-water irrigation programs throughout substantial portions of our HFTD service territory should be more fully understood in considering this aspect of the recommendation.
- C. The second performance metric recommendation references a number of pieces of potential data to be collected and shared. PG&E agrees that there may be value in a system like this and encourages further technical discussion on what data is feasible, already available, difficult or easy to obtain, etc.

6. Analyzing Near Misses

- A. PG&E appreciates the Board's recommendation that focusing "near miss" tracking on events that occurred during a PSPS shutdown is a very helpful clarification of the definition of this concept. The definition of "near miss" to date has been broad and ambiguous and this clarification would provide more consistency that would then allow for more uniform analysis and comparison across utilities.

7. Training Programs and Qualified Electrical Workers

- A. PG&E agrees with the Board that it is important that workers performing all electric utility work, and particularly wildfire related work and inspections, be well trained and qualified professionals. If there is concern as to that fact, PG&E is very open to more fully explaining the training provided to and qualifications expected of inspectors.
- B. To the extent that additional trained and qualified workers (or inspectors) are needed to meet future work plan needs PG&E would also be willing to share our plans for addressing any such identified gaps.

8. Criteria to Prioritize Reducing PSPS Events for Critical Infrastructure

- A. PG&E is aligned with the direction the Board has identified in this recommendation. A more granular analysis of wildfire risk by circuit (or segment) is something we are working on for both overall wildfire risk reduction and PSPS customer impact reduction. However, this is a complex analysis over a very large system (>30,000 overhead line miles in HFTD). Therefore, an appropriate time duration must be recognized to implement some of the aspects of this recommendation.
- B. Accelerating these efforts may not be realistic, and rushing this analysis may miss the mark, thereby inappropriately addressing the wildfire risk in question. We are aligned with the goals of this recommendation and would encourage further discussion between the Board, WSD, utilities and other interested parties as to the appropriate milestones along this journey to a more mature and granular wildfire risk analysis.

9. Analyzing Fire Maps to Exclude Lines from PSPS Events

- A. PG&E completely agrees with this recommendation. We are implementing this activity right now, referred to as our High Fire Risk Areas (HFRA) analysis. This was mentioned in the 2020 WMP but not thoroughly explained as it was neither complete nor very mature at time of plan filing.

10. Risk Spend Efficiency and Costs of PSPS Events

- A. PG&E understands the desire to assess and incorporate “costs to customers” into PSPS RSE analysis and is open to further discussion on the best way to do so. PG&E is not immediately aware of a comprehensive method of quantifying these costs, much less a widely accepted method for doing so. PG&E understands and agrees that “Stakeholders, especially local governments and community groups would want to provide input into developing the assumptions and quantifying the negative costs to customers that the utilities may include in their risk spend efficiency analysis.”
- B. Given the multi-party nature of something like this, PG&E anticipates that the WSD (or other CPUC division or state agency) would need to facilitate this creation of a model to quantify PSPS associated customer costs. PG&E foresees an S-MAP-like process to create alignment between various stakeholders on this quantification methodology.

11. Re-Energization after PSPS Events

- A. This is a recommendation PG&E agrees with and is already working towards. The Board recommends that utilities set a re-energization time goal which the Board has noted PG&E has already done in our 2020 WMP.
- B. The Board further recommends utilities conduct a post-mortem on any circuits that were not energized within the goal timeframe. This is similar to aspects of PG&E’s post-event After Action Review process so PG&E is further aligned with this concept.

II. CONCLUSION

PG&E greatly appreciates the thoughtful engagement of the Board in providing these recommendations for future Wildfire Mitigation Plans. Several of these recommendations are productive and ready to move forward as written. Others may require a bit more refinement or consultation across multiple parties. PG&E looks forward to those discussions and engagement as we all work together to further reduce wildfire risk and continue to make the WMP process more effective and efficient.

Sincerely,

A handwritten signature in blue ink that reads "Matthew Pender". The signature is written in a cursive, slightly slanted style.

Matthew Pender