



October 2, 2020

VIA E-MAIL

Wildfire Safety Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
WildfireSafetyDivision@cpuc.ca.gov

Re: Pacific Gas and Electric Company's Comments on Wildfire Safety Division Staff Proposal and Workshop on Wildfire Mitigation Plan Compliance Process

Dear Wildfire Safety Division:

Pacific Gas and Electric Company (PG&E) appreciates the Wildfire Safety Division's (WSD) Staff Proposal on the Wildfire Mitigation Plan Compliance Process (Staff Proposal) and the input provided by stakeholders during the September 29, 2020 workshop. PG&E is committed to mitigating the risk of catastrophic wildfires through the programs being implemented in its WMP and through timely corrective actions of conditions identified in the field. PG&E generally agrees with the intent of the proposal, and provides the following suggestions to enhance the Staff Proposal:

- (1) Corrective action timelines should be aligned with existing corrective action timelines per Rule 18 standards;
- (2) Defect severity definitions should be explicitly defined;
- (3) Compliance periods should be measured in calendar years;
- (4) Metrics should not be completely outcome-based

Corrective Action Timelines

WSD has been conducting compliance inspections throughout our service territory since May of 2020 and reporting potential defects found in the field. WSD has not limited their inspections to only WMP initiatives but has expanded their reporting to other potential defects pursuant to existing General Orders (G.O), such as G.O. 95. We appreciate the WSD providing their field observations. Safety is our number one priority and being made aware of potential defects helps mitigate the risk of ignitions.

The Staff Proposal sets forth an accelerated corrective action timeline for WMP-related defects, and we agree with the timeline for highest-risk category 1 defects being addressed immediately. However, the proposed corrective action timelines for less-urgent WMP-defects are not aligned with the existing corrective action timelines for similar non WMP-related defects. This can have several adverse and unintended consequences. First, this will require significant procedural changes for the teams that perform this work, creating two separate corrective timelines depending on the nature of a defect. As a result, corrective actions that could be safely resolved as a normal course of business would now require break-in action to be taken much quicker and potentially at the expense of higher-risk corrective work or initiatives. In order to remain in compliance with the proposed corrective timelines would require significant investment in resources, training, and procedure development without any clear benefit to risk reduction. Second, adhering to the proposed corrective timeline may not only be confusing to implement accurately, it may also prevent compliance with various local, state, and federal permitting requirements to perform corrective work. Accelerating the corrective action timelines ought to take into account these types of interdependencies.

As such, PG&E strongly recommends that the WMP-related corrective action timelines adhere to the same requirements as General Order 95, Rule 18. PG&E closely monitors the corrective actions required on its system and generally adheres to the Rule 18 timeline, or extends correction times based on a risk-informed prioritization method. Due to the extensive inspections through the Wildfire Safety Inspection Program (WSIP), since 2018 a significant amount of low-risk electric corrective (EC) tags have been identified. The annual risk-based assessment of each tag and the interim controls allows us to closely monitor the severity of defects and re-prioritize our workplan to address the highest-risk defects in a safe and timely manner.

Defect Severity

The Staff Proposal defines compliance findings as severe, moderate, and minor.^{1/} While we do not generally disagree with this categorization as it closely aligns with how we currently categorize maintenance repairs, we recommend that discretion be granted to the utilities in determining the severity. PG&E inspectors have a significant amount of training in the evaluation of structures, and, based off the experiences to date, do not always agree with the severity of defects that have been reported in WSD inspections. Given the proposed corrective action timelines to respond to proposed defects, the utilities need to have input in determining the severity of a defect. Recognizing that assessments are somewhat subjective to the experience of the individual inspector, we would like to work with WSD to align on determining the severity of a defect to ensure the highest risk conditions are being addressed by the teams and resources in the appropriate order and manner.

^{1/} Staff Proposal at p. 5.

Compliance Period

As outlined in the Staff Proposal, WSD intends to define an annual compliance period as one year from the approval date of the WMP.^{2/} However, this does not align with how the utilities plan and execute WMP work and set program targets – which is done by calendar year. To perform compliance assessments, the utilities will have to provide WSD with the lists of completed projects and locations from their respective WMPs. Rather than stagger the utilities annual work plan and execution process with the proposed timeline in the Staff Proposal, we suggest the WSD measure compliance by calendar year rather than annual approval dates. Measuring compliance by annual approval dates would either require the WSD to delay their annual assessment by up to six months or have the annual assessment measure work performed across two different WMP annual work plans. We believe it would benefit WSD and the utilities to align the compliance periods to the calendar year to ensure assessments align with a singular WMP scope and ensure timely compliance assessments.

Metrics

During the workshop on September 29, several parties emphasized the importance of the WSD assessing compliance based solely on outcomes. While we understand and are focused on improving wildfire-related outcomes, it is necessary to measure compliance by our adherence to the commitments made in our Wildfire Mitigation Plans and corrective actions taken based on the WSD's on-going compliance assessments. Despite the activities of the utilities and numerous other parties, wildfire-related outcomes are irregular and unpredictable. The purpose of the WMP, including the review and approval process, is to establish the prudent and approved actions the utility ought to be taking to reduce wildfire risk and thereby drive improved wildfire outcomes over time. The compliance branch should have a feasible and clearly defined scope for assessing compliance with the approved WMPs in terms of actions, deliverables and measurable outcomes.

Conclusion

PG&E greatly appreciates the opportunity to provide input on the Staff Proposal. Our most important responsibility remains the safety of the customers and communities we serve. The Staff Proposal is good step forward in assessing the progress and compliance of our programs in reducing wildfire risk. Our proposed changes mentioned above are based on the valuable experiences we have gained over the last few years in mitigating wildfire risk and are intended to

^{2/} Staff Proposal at p. 4.

Wildfire Safety Division

October 2, 2020

Page 4

increase the efficiency of the compliance process without inadvertent impacts to safety. We look forward to the continued collaboration as we mature in this process.

Sincerely,

/s/ Anne Beech

Anne Beech

Director, Pacific Gas and Electric Company,

Electric Operations Regulatory Compliance & Investigations

cc: R.18-10-007 service list