May 21, 2021

VIA ELECTRONIC MAIL

Caroline Thomas Jacobs, Director
Wildfire Safety Division (WSD)
California Public Utilities Commission
505 Van Ness Avenue
San Francisco CA 94102
Wildfiresafetydivision@cpuc.ca.gov

Subject: Request for Extension of Time to Provide Comments on Revision Notice Responses

Dear Director Thomas Jacobs:

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully requests that the due date for providing comments on Wildfire Safety Division (WSD) Revision Notice Responses from the investor-owned utilities (IOUs) Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and Bear Valley Electric Service, Inc. (BVES), due on June 3, 2021, be extended. Cal Advocates respectfully requests that the due dates of comments be changed from the original due date of Thursday, June 10, 2021 to Monday, June 14, 2021, with the reply comments due date changed from Wednesday, June 16, 2021 to Monday, June 21, 2021.

In its revision notices, WSD set forth detailed descriptions of the critical issues that the utilities must address before a determination on the 2021 WMP updates can be issued: six

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issues for PG&E, four for SCE, and two for BVES. For each issue, WSD also set forth
descriptions of remedies that utilities must take, including supplying internal reports,
setting quantitative targets, identifying required measures, describing utility processes,
and rewriting WMP sections. In PG&E’s case, it is required to revise its section
regarding system hardening risk-spend efficiencies, including submitting information in a
detailed template from WSD itself.²

WSD’s revision notices rightfully demand detailed and exhaustive responses from the
utilities, and evaluating these answers takes much time and effort from limited staff.
Cal Advocates submits that seven days is not sufficient for parties to fully review these
potentially lengthy responses and analyze the accompanying data. A deadline extension
will result in more thorough and accurate public comments from Cal Advocates and
others, which will assist your division in making informed decisions to approve or deny
these revisions.

Commission Resolution WSD-011 states that “WSD may modify the 2021 WMP
schedule as deemed necessary via written notice to stakeholders subject to the statutory
parameters set forth in [Public Utilities Code] § 8386(b).”³ In the revision notices, WSD
found that the identified issues were of “significant enough importance” to even extend a
statutory deadline⁴ to ensure that the utilities satisfy the information requirements set
forth in Resolution WSD-011 and “when implemented, will sufficiently reduce utility-
related wildfire risk and impacts to public safety.”⁵ To promote robust review of these
significantly important revision notice responses, Cal Advocates respectfully requests the
WSD to exercise its authority and grant this request for extension of time.

Cal Advocates has surveyed several parties to Rulemaking 18-10-007 regarding this
extension request. The following parties have stated that they support the requested
extension: The Utility Reform Network and Mussey Grade Road Alliance. The
following parties have stated that they neither support nor oppose the requested
extension: PG&E and SCE. The following parties have stated that they do not object to
the requested extension: BVES.

² Letter, WSD, Wildfire Safety Division’s Revision Notice for Pacific Gas & Electric Company’s 2021
³ Resolution WSD-011, p. 9 (citing Pub. Util. Code § 8386(b)).
⁴ Pub. Util. Code § 8386.3(a) (“The Wildfire Safety Division shall approve or deny each wildfire
mitigation plan and update submitted by an electrical corporation within three months of its submission,
unless the division makes a written determination, which shall include reasons supporting the
determination, that the three-month deadline cannot be met.”).
⁵ Letter, WSD, Wildfire Safety Division’s Revision Notice for Pacific Gas & Electric Company’s 2021
Wildfire Mitigation Plan Update (May 4, 2021), p. 2. Identical language is included in the revision notices
to SCE and BVES.
Sincerely,

/s/ CHASEL LEE
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Attorney

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Cc: Service List of R.18-10-007