

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



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, 2021,¹ 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

¹ Letter, WSD, Wildfire Safety Division's Revision Notice for Pacific Gas & Electric Company's 2021 Wildfire Mitigation Plan Update (May 4, 2021); Letter, WSD, Wildfire Safety Division's Revision Notice for Southern California Edison Company's 2021 Wildfire Mitigation Plan Update (May 4, 2021); Letter, WSD, Wildfire Safety Division's Revision Notice for Bear Valley Electric Service, Inc.'s 2021 Wildfire Mitigation Plan Update (May 4, 2021).

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 Wildfire Mitigation Plan Update (May 4, 2021), pp. 3, 11-12.

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
Chasel Lee
Attorney

Public Advocates Office
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102
Telephone: (415) 703-2844
E-mail: Chasel.Lee@cpuc.ca.gov

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