

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

R. 18-10-007
(Filed October 25, 2018)

**COMMENTS OF THE COUNTY OF SANTA CLARA
ON PACIFIC GAS AND ELECTRIC COMPANY'S 2021 WILDFIRE MITIGATION
PLAN**

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I. Introduction

The County of Santa Clara (“County”) respectfully submits the following comments on Pacific Gas and Electric Company’s (“PG&E”) 2021 Wildfire Mitigation Plan (“WMP”), filed on February 5, 2021 as part of the California Public Utilities Commission’s (“Commission’s”) Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018).¹ These comments are timely filed pursuant to the Wildfire Safety Division (“WSD”) Acting Program Manager’s March 1, 2021 response to the Joint Stakeholder Request for Extension of Time to Provide 2021 Wildfire Mitigation Plan Comments. The County appreciates the opportunity to provide comments on PG&E’s 2021 WMP and strongly supports efforts by PG&E and the Commission to ensure continuous, safe, and reliable electricity services to all California residents.

The County recognizes the significant yields PG&E has achieved in 2020 from investments to reduce the size, scope, and duration of Public Safety Power Shutoff (“PSPS”) events in Northern California. PG&E’s reduction in the number of customers impacted by each event by approximately 55 percent is noteworthy, as is its 40 percent improvement in average outage duration times after weather “all clear” from a 2019 baseline.² The County supports

¹ The County was granted party status in this rulemaking proceeding (R. 18-10-007) on November 7, 2019.

² Pacific Gas & Electric Co., 2021 Wildfire Mitigation Plan at p. 854 (R. 18-10-007) (Feb. 5, 2021) (hereinafter “2021 WMP”).

PG&E’s continuing efforts to limit the reach and duration of PSPS events through installation of sectionalization devices, temporary microgrids, islanding, and other grid enhancements, as well as de-scoping of hardened circuits. The County also supports PG&E’s continued investments in situational awareness, including its proposal to expand installation of cameras in high-fire threat districts.³ As demonstrated by a recent experience in Santa Clara County, where a PG&E-installed camera was used to actively monitor an emerging wildfire, these cameras provide valuable information to assist with fire monitoring and suppression, protection of utility assets and other critical infrastructure, and public safety and emergency response efforts. Likewise, the County acknowledges that PG&E has made significant investments in mitigating the impacts of PSPS events where they occur, including its efforts to coordinate with local and tribal governments to target Community Resource Center (“CRC”) sites and improvements in direct provision of resources to Community-Based Organization (“CBOs”) to support vulnerable members of the community.

At the same time, however, PG&E’s 2021 WMP raises significant concerns in its retreat from important goals and projections set forth in its 2020 WMP regarding the reduction in frequency and gradual phaseout of PSPS events. Despite significant and costly investments in grid enhancements and vegetation management, PG&E now forecasts equal or more frequent use of PSPS events throughout the next decade. The impression left by PG&E’s WMP is that PSPS events are no longer being viewed as a tool of last resort but rather as a mainstay wildfire mitigation strategy. That is an unacceptable outcome. Likewise, other aspects of PG&E’s WMP—including its proposed preventative use of fire retardants—raise concerns with potentially significant environmental impacts and other externalized costs of PG&E’s mitigations. The County offers the following opening comments on these areas of PG&E’s 2021 WMP.

II. Discussion

A. Directional Vision for Necessity of PSPS Events

1. Reliance on PSPS Events

A central premise of the Commission’s PSPS regulatory framework has been that PSPS events are to be used as a mitigation measure of last resort and steadily phased out as the investor-owned utilities’ (“IOUs”) grid enhancement, vegetation management, and fuel reduction

³ See *id.* at 413-14.

investments reduce and ultimately eliminate the need to rely on this costly instrument. For this reason, the Commission has required the IOUs to disclose “comprehensive information” “regarding de-energization mitigation efforts including asset and vegetation management, sectionalizing, switching, system hardening, and backup power projects that they are undertaking to reduce the need for or scope of de-energization events,” with the aim of helping customers to understand “whether there is work in progress toward eliminating the need for de-energization events.”⁴ Further, beginning in 2021, the IOUs are required to disclose in their WMPs “short, medium, and long-term actions” they are taking to reduce “the need for de-energization events to mitigate wildfire risk.”⁵

PG&E’s 2021 WMP does not appear to satisfy these requirements. Although PG&E has achieved and projects to continue achieving decreases in the scope and duration of PSPS events, it projects no change in the frequency of PSPS events over the next ten years.⁶ This represents a retreat from PG&E’s 2020 WMP, in which it projected a potential decrease in PSPS events⁷ and included “minimizing the frequency” of PSPS events among its goals.⁸ And it reflects an even more significant retreat from the 2019 statement by its former CEO, Bill Johnson, in a hearing before the U.S. Senate Commission on Energy and Natural Resources, that PG&E would “largely eliminate” the use of PSPS events in five years and that it would deploy “shorter, fewer PSPS events” in the interim.⁹ It is concerning that PG&E’s \$5.8 billion investment in wildfire mitigation since 2016 have not successfully translated into a reduced reliance on PSPS events.

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⁴ Cal. Pub. Util. Comm’n, Decision Adopting Phase 2 Updated and Additional Guidelines for De-Energization of Electric Facilities to Mitigate Wildfire Risk at pp. 89, 98 (D. 20-05-051) (May 28, 2020).

⁵ *Id.* at 98.

⁶ 2021 WMP at p. 865.

⁷ Pacific Gas & Electric Co., 2020 Wildfire Mitigation Plan Report at p. 4-30 (R.18-10-007) (Feb. 28, 2020).

⁸ *Id.* at p. 5-2.

⁹ *Hearing on Wildfires and Electric Grid Reliability Before the S. Comm. on Energy and Natural Resources*, 116th Cong. (2019) (statement of Bill Johnson, CEO and President, PG&E Corporation), at 1:01:00, <https://www.energy.senate.gov/public/index.cfm/hearings-and-business-meetings?ID=38AF59AB-6C4C-4854-87CA-48CFD630A032>.

As the home to a population of over 1.9 million residents¹⁰ and as a direct provider of critical and essential services that depend on electricity supplied by PG&E,¹¹ the County is intimately familiar with the significant costs, disruptions, health and safety impacts, and other negative externalities of de-energization events to residents and the infrastructure that serves them. As an example, the County has estimated the total value of County services impacted by October 2019 PSPS events alone to amount to \$5,275,032.¹² The impacts of these events also extend well beyond costs incurred by the County as an entity. During the October 9-12, 2019 PSPS event, approximately 1,086 PG&E Medical Baseline¹³ customer accounts were impacted by the de-energization.¹⁴ Further, an estimated 619,729 individuals residing in the County—nearly one third of the County population—have access and functional needs and may require backup power for assistive devices, evacuation and transportation, and care and shelter during PSPS events,¹⁵ as well as food and medication replacement. Despite significant investments by PG&E, the County, and the community in mitigating impacts of PSPS events on essential infrastructure and vulnerable populations, the costs, disruptions, and harms caused by PSPS events will remain severe.

The County is further concerned that PG&E’s projections may understate its reliance on PSPS events in light of PG&E’s stated “significant outstanding uncertainty about the scope of

¹⁰ *E-1 Population Estimates for Cities, Counties and the State with Annual Percent Change — January 1, 2018 and 2019*, State of California Department of Finance (May 2019), <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-1/>.

¹¹ As just one example, the County owns and operates three major hospitals, each of which has acute care facilities.

¹² *Off-Agenda Report on Costs Associated with the PG&E Public Safety Power Shutoffs – Referral from November 5, 2019*, County of Santa Clara Finance Agency Controller-Treasurer Department (Dec. 5, 2019) (on file with the Office of the Clerk of the Board of Supervisors for the County of Santa Clara).

¹³ PG&E’s Medical Baseline Program is an elective ratepayer program for which customers with qualifying medical conditions may apply. To qualify for the Medical Baseline Program, a qualified medical practitioner must certify that a full-time resident in the home requires use of qualifying medical devices to treat ongoing, qualifying medical conditions (e.g., dependency on life-support equipment that they use at home, such as a respirator or dialysis machine). Medical Baseline customers pay lower rates on energy bills and receive extra notifications prior to PSPS events. *Medical Baseline Program overview*, Pacific Gas and Electric Company, https://www.pge.com/en_US/residential/save-energy-money/help-paying-your-bill/longer-term-assistance/medical-condition-related/medical-baseline-allowance/medical-baseline-allowance.page?WT.mc_id=Vanity_medicalbaseline (last visited Feb. 5, 2020).

¹⁴ *PG&E PSPS Referral BOS-EMS Agency* (Nov. 20, 2019), <http://sccgov.iqm2.com/Citizens/FileOpen.aspx?Type=4&ID=195160>.

¹⁵ *Public Safety Power Shutoff Annex: Hazard-Specific Annex to the County of Santa Clara Emergency Operations Plan*, at 62 (Oct. 2019), <http://sccgov.iqm2.com/Citizens/FileOpen.aspx?Type=4&ID=195821&MeetingID=12135>.

PSPS in 2021.”¹⁶ PG&E has projected a “significant potential” expansion of PSPS events as a result of proposed Conditions of Probation in the proceeding *United State of America v. Pacific Gas and Electric Co.*, Case No. 14-cr-00175-WHA (N.D. Cal.),¹⁷ which would require PG&E to incorporate information regarding hazard trees into its de-energization models.¹⁸ The 2021 WMP does not appear to account for this potential significant modification in PG&E’s PSPS planning. The County recommends that PG&E be required to amend its 2021 WMP should those conditions be imposed to ensure that the public is adequately informed about the anticipated scope and frequency of PSPS events over the coming season. The County further recommends that thorough consideration be given to the long-term role that PSPS events should play in wildfire mitigation.

2. Mitigations

The County supports PG&E’s work to reduce the scope of PSPS events through grid enhancements such as installation of sectionalizing devices and microgrids. As wildfire impacts and use of de-energizations expand geographically, the County encourages PG&E to employ these enhancements on a system-wide basis and not only in counties that have been the focal point of PSPS events in prior years.¹⁹ The County further encourages PG&E to expand its investments in distribution microgrids to support continuity of critical infrastructure for the full duration of PSPS events.²⁰ Among microgrid placement targets, the County strongly encourages PG&E to focus on protection of essential telecommunications infrastructure in high fire threat districts throughout its service territory, including in Santa Clara County, to ensure that emergency response efforts, public alerts, and other emergency notifications are not crippled if, for instance, critical cell towers are taken offline during extended PSPS outages. The failure or inadequacy of backup generation to support essential telecommunications infrastructure during PSPS events would be particularly devastating, resulting in impaired fire suppression and grave public health and safety hazards if emergency communication with the community cannot be accomplished as fires spread.

¹⁶ 2021 WMP at p. 16.

¹⁷ See Amicus Letter by California Public Utilities Commission at p. 1, *United States v. Pacific Gas & Electric Co.*, Case No. CR 14-00175 WHA (N.D. Cal. Mar. 19, 2021)

¹⁸ See Order to Show Cause RE Conditions of Probation, *United States v. Pacific Gas & Electric Co.*, Case No. CR 14-00175 WHA (N.D. Cal. Dec. 29, 2020).

¹⁹ Cf. 2021 WMP at 850.

²⁰ *Id.* at p. 535.

B. Proposed Preventative Use of Fire Retardants

PG&E was directed to describe its pilots of preventative use of fire retardants in its 2021 WMP, including the environmental permitting processes required for deployment and how it is selecting areas for use.²¹ PG&E's disclosures in its 2021 WMP fall short. PG&E states that fire retardant use has proved important for preventing asset losses, but it does not describe the scope, extent, and nature of the use or its efficacy compared to alternative mitigations.²² It further acknowledges that environmental review may be required for approved use of fire retardants on state and federal lands but does not address environmental review of this use on local jurisdiction and private lands or on a programmatic basis.²³ Further, PG&E does not specify how and where it intends to use the fire retardants and which fire retardants may be employed or excluded because of toxicological and environmental concerns. As a result, the WMP leaves stakeholders in the dark regarding the true need, scope, and potential impacts of fire-retardant use as a prophylactic measure.

The County encourages the Commission to ensure that PG&E's proposed use of fire retardants, potentially across its entire service territory, is subject to detailed disclosures, environmental review, and public comment, both as necessary to inform specific discretionary approvals and on a programmatic basis to inform the entire affected public. In particular, as wildfires increasingly enter wildland-urban interfaces, the prospective use of fire retardants in and adjacent to urban areas raises heightened concerns about potential human exposures,²⁴ and the use of fire retardants across ecosystems raises concerns about long-lasting surface and groundwater contamination. Further, the effectiveness of preventative use of fire retardants on a landscape scale has not been established,²⁵ and the potential benefits of this application must be

²¹ *Id.* at Table 4.6-2

²² *Id.* at p. 483.

²³ *Id.* at p. 644.

²⁴ See, e.g., Sarah A. Carratt, *Pesticides, Wildfire Suppression Chemical, and California Wildfires: A Human Health Perspective*, Current Topics in Toxicology Vol. 13 (2017) at p. 9, available at <https://escholarship.org/uc/item/7rh1s9z8> (proposing that the people most at risk of health impacts from pesticide and retardant interactions with wildfires are those that live near the urban interface in high population densities"); see also *id.* at 9-10 (discussing water contamination attributable to use of long-lasting PFAAs chemicals in firefighting foam, adverse effects of PFAAs to human health, and increased potential for human exposures at urban interface).

²⁵ See, e.g., Christina Santin et al., *No Evidence of Suitability of Prophylactic Fluids for Wildfire Prevention at Landscape Scales*, PNAS 117(10) 5103-5104 (Mar. 10, 2020), available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7071896/> (arguing that data does not support suitability

quantified and evaluated against costs to human health and the environment before this proposed mitigation is employed. These proposed uses require thorough public disclosure and vetting.

III. Conclusion

The County appreciates the opportunity to provide comments on PG&E's 2021 WMP and looks forward to continuing to work with PG&E and the Commission to move towards the provision of safe, continuous, and reliable electricity services.

Respectfully submitted March 29, 2021, at Palo Alto, California.

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of prophylactic fire-retardant treatment for “real landscape-scale applications” in areas at high risk of wildfires).