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January 20, 2021

Ms. Caroline Thomas Jacobs  
Director, Wildfire Safety Division  
California Public Utilities Commission, Wildfire Safety Division  
505 Van Ness Avenue  
San Francisco, CA 94102

*Transmittal via email: [wildfiresafetydivision@cpuc.ca.gov](mailto:wildfiresafetydivision@cpuc.ca.gov) and R.18-10-007 service list*

**RE: MUSSEY GRADE ROAD ALLIANCE COMMENTS ON DRAFT COMPLIANCE OPERATIONAL PROTOCOLS**

Dear Director Thomas Jacobs:

The Mussey Grade Road Alliance (MGRA or Alliance) serves these comments pursuant to the instructions in the January 8, 2021 email from the Wildfire Safety Division,<sup>1</sup> which allows public comment prior to January 22, 2021.

MGRA has reviewed the draft compliance protocols and accompanying quarterly initiative review (QIU) template. The Alliance supports WSD's goal of having uniform reporting standards for all utilities.

The Alliance has one comment on the annual schedule submitted in the draft compliance protocols.<sup>2</sup> Starting in 2022, WSD foresees the submission of Q4 quarterly advice letters, quarterly initiative updates, and quarterly data report simultaneous with the release of the wildfire mitigation plans (WMPs). The Alliance has noted in the past that the short timeframe available for intervenor comments will hamper the contributions from stakeholders. Adding additional deliverables with even shorter deadlines may create a substantial stakeholder burden and further degrade stakeholder

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<sup>1</sup> Email; From: Wildfire Safety Division; Subject: WSD Draft Compliance Operational Protocols; January 8, 2021, 10:15 AM

<sup>2</sup> Wildfire Safety Division; SUBJECT: Wildfire Safety Division – Draft Compliance Operational Protocols; January 8, 2021; p. 2.

contributions. We recommend that WSD request that IOUs provide their Q4 QAL, QIU, and QDR on January 20<sup>th</sup> for years after 2021. This will give stakeholders ten days to provide comment prior to the release of the WMPs.

The Alliance appreciates the opportunity to provide comment on this WSD proposal.

Respectfully submitted this 20<sup>th</sup> day of January, 2021,

By: /S/ **Diane Conklin**

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