

**PUBLIC ADVOCATES OFFICE**

PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



To: **Caroline Thomas Jacobs, Director**  
Wildfire Safety Division  
California Public Utilities Commission

**COMMENTS OF THE PUBLIC ADVOCATES OFFICE ON  
THE SEPTEMBER 2020 QUARTERLY REPORTS ON  
2020 WILDFIRE MITIGATION PLANS**

**MATTHEW KARLE**  
**AARON LOUIE**  
Regulatory Analysts

**DIANA L. LEE**  
Deputy Chief Counsel

**MATTHEW TAUL**  
**ALAN WEHRMAN**  
Utilities Engineers

**HENRY BURTON**  
Program and Project Supervisor

Public Advocates Office  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Telephone: (415) 696-7311  
Email: [Henry.Burton@cpuc.ca.gov](mailto:Henry.Burton@cpuc.ca.gov)

Public Advocates Office  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Telephone: (415) 703-4342  
Email: [Diana.Lee@cpuc.ca.gov](mailto:Diana.Lee@cpuc.ca.gov)

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## I. INTRODUCTION

Pursuant to the Wildfire Safety Division’s July 17, 2020 guidance statement and September 8, 2020 letter extending the comment period, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these comments on the September 2020 Quarterly Reports on 2020 Wildfire Mitigation Plans.

Five utilities<sup>1</sup> submitted their September 2020 Quarterly Reports to the Wildfire Safety Division (WSD) on September 9, 2020: Liberty Utilities (Liberty), Pacific Gas and Electric Company (PG&E), PacifiCorp, Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E).

In these comments, Cal Advocates makes the following recommendations:

<b>Utility</b>	<b>Recommendation</b>	<b>Timeline</b>
All	Each electric utility should present a plan to complement expert judgment with empirical evidence when estimating mitigation effectiveness of its WMP activities.	2021 WMP Updates
All	The WSD should hold workshops to facilitate sharing of best practices regarding at-risk tree species.	Before 2021 WMP Updates
PG&E	PG&E should submit additional information on 600 miles of high-risk circuits for which it could not provide geographical information system (GIS) data.	Within 30 days
PG&E	PG&E should develop a plan to disaggregate its costs to the individual initiative level to sufficiently answer Condition Guidance-5.	Within 30 days
PG&E	PG&E should provide updates on its quality assurance results for its enhanced vegetation management program.	Each future Quarterly Report
PG&E	PG&E should provide an update on incorporating new data sets into its risk modeling.	2021 WMP Update
PG&E	PG&E should provide ongoing updates on efforts to reduce reliance on de-energization.	Each future Quarterly Report

<sup>1</sup> Many of the Public Utilities Code requirements relating to wildfires apply to “electrical corporations.” See e.g., Public Utilities Code Section 8386. These comments use the more common term “utilities” and the phrase “electrical corporations” interchangeably to refer to the entities that must comply with the wildfire safety provisions of the Public Utilities Code.

SCE	The WSD should require SCE to steadily reduce incidents and ignitions that are attributed to unknown or unspecified causes.	2021 and 2022 WMP Updates
SCE	The WSD should require SCE to provide more detail on its plans to replace non-exempt hot line clamps.	December 2020 Quarterly Report
SDG&E	SDG&E should propose a plan to collect recruiting metrics per Condition Guidance-11.	December 2020 Quarterly Report
SDG&E	SDG&E’s plan to measure the efficacy of enhanced tree trim clearances should evaluate whether there is a causal relationship between increased tree trim clearances and fewer ignitions.	As soon as possible

Cal Advocates has no comments at this time on the September 2020 Quarterly Reports submitted by Liberty and PacifiCorp.

## II. BACKGROUND

Resolution WSD-002, the *Guidance Resolution on 2020 Wildfire Mitigation Plans Pursuant to Public Utilities Code Section 8386*, directs electrical corporations to submit quarterly reports to address the Class B deficiencies<sup>2</sup> in their Wildfire Mitigation Plans (WMPs). Resolution WSD-002 states that Class B deficiencies “are of moderate concern and require reporting on a quarterly basis by the electrical corporation to provide missing data or update its progress.”<sup>3</sup> Resolution WSD-002 requires that each utility file a quarterly report within 90 days of the Commission’s adoption of the resolution, which occurred on June 11, 2020. Accordingly, Liberty, PacifiCorp, PG&E, SCE, and SDG&E submitted their September 2020 Quarterly Reports on September 9, 2020.

On July 17, 2020, the WSD issued a guidance statement that permits stakeholders to submit comments within 14 days of the submission of each quarterly report. On September 1, 2020, Cal Advocates, Mussey Grade Road Alliance, the Protect Our Communities Foundation, The Utility Reform Network, and Bear Valley Electric Service, Inc. requested an extension of the comment period to 21 days, as well as the opportunity to submit reply comments within 14

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<sup>2</sup> Resolution WSD-002 defines a Class B deficiency as an area where “insufficient detail or justification [is] provided in WMP.” The additional information “shall be submitted either one time in the first quarterly report or on an ongoing basis as specified by each condition.” Resolution WSD-002, pp. 17-18.

<sup>3</sup> Resolution WSD-002, p. 18.

days of opening comments. On September 8, 2020, the WSD granted this request.

### III. GENERALLY APPLICABLE RECOMMENDATIONS

#### A. **The WSD should require electric utilities to present a plan to complement expert judgment with empirical evidence when estimating the mitigation effectiveness of WMP activities.**

The responses from the electric utilities to Condition Guidance-1, “Lack of risk spend efficiency (RSE) information,” demonstrate a reliance on subject matter expert (SME) judgment in estimating the mitigation effectiveness of wildfire mitigation activities. As an example, SCE’s RSE model<sup>4</sup> estimates its Wildfire Covered Conductor Program will mitigate faults caused by animal and balloon contact by 99 percent, and vehicle contact by 50 percent.<sup>5</sup> These mitigation effectiveness values are based on SME judgment only.

The lack of quantified, empirical data to support the mitigation effectiveness value of SCE’s covered conductor program is troubling because this program is forecast to consume nearly half of SCE’s WMP budget for the years 2020 to 2022.<sup>6</sup> SCE’s RSE model similarly relies partially or wholly on SME judgment to estimate the effectiveness of other wildfire mitigation activities.

The WSD should require each electric utility to collect data on the number of incidents and ignitions observed in regions where it has conducted wildfire mitigation activities (such as deploying covered conductor), with the data disaggregated by ignition driver. The utilities should use this empirical data to estimate the actual effectiveness of their wildfire mitigation activities at mitigating ignitions caused by these drivers.

Each electric utility should provide a plan to supplement and complement “SME judgment” as the justification for the mitigation effectiveness of wildfire mitigation activities in future iterations of its WMP. Each utility should submit this plan, as well as data collected by the end of 2020, in its 2021 WMP update.

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<sup>4</sup> *Southern California Edison Company’s First Quarterly Report on 2020-2022 Wildfire Mitigation Plan for Class B Deficiencies*, September 9, 2020 (SCE September 2020 Quarterly Report), Condition Guidance-1 Appendix D, p. 10 (provided in Microsoft Excel format as “Guidance-01 Appendix\_D.xlsx”).

<sup>5</sup> SCE September 2020 Quarterly Report, Condition Guidance-1, Appendix D, worksheet “M01.”

<sup>6</sup> Resolution WSD-004, Appendix A, p. A18.

**B. The WSD should hold workshops to facilitate sharing of best practices regarding at-risk tree species.**

In response to Condition SCE-14, “SCE relies only on growth rate to identify ‘at-risk’ tree species,” SCE provided a list of attributes that it uses in identifying high-risk tree species. SCE also explained how tree species risk is considered within the context of SCE’s line-clearing and Hazard Tree Management Program.<sup>7</sup> In response to a data request from Cal Advocates, SCE provided a list of defects used in its Tree Risk Calculator to identify high-risk trees and to prioritize trees for mitigation efforts.<sup>8</sup>

Cal Advocates observes that the electric utilities would benefit from sharing data and best practices regarding identification and mitigation of at-risk trees, such as those provided by SCE in its September 2020 Quarterly Report. To facilitate this knowledge sharing, the WSD should hold workshops with electric utilities and stakeholders, prior to the February 2021 WMP update submissions.

**IV. PG&E**

**A. The WSD should require PG&E to provide additional information regarding 600 miles of circuits with high wildfire risks.**

As part of Condition PG&E-5, the WSD required PG&E to provide supporting GIS data for the 5,500 miles of circuit within the high fire threat districts (HFTD) which PG&E identified as representing “95% of PG&E’s wildfire risk.”<sup>9</sup> PG&E’s Quarterly Report provided GIS data for only 4,900 miles of these highest priority circuit segments and stated that “approximately 600 miles of the 5,500 highest priority segment miles originally identified can no longer be accurately mapped because of changes to equipment on PG&E’s distribution circuits....”<sup>10</sup> Cal

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<sup>7</sup> SCE September 2020 Quarterly Report, Condition SCE-14, pp. 233 – 238.

<sup>8</sup> SCE’s response to data request CalAdvocates-SCE-2020WMP-04, Question 004, submitted September 23, 2020.

<sup>9</sup> *Pacific Gas and Electric Company 2020 Wildfire Mitigation Plan Report Updated*, February 28, 2020, p. 5-274.

<sup>10</sup> “The underlying data used to create Figure PG&E 5-26 was collected in the later part of 2018 and the 5,500 miles related to circuit segments as PG&E’s system was configured at the time. Because PG&E’s electric infrastructure is a dynamic collection of assets, equipment is regularly replaced and deactivated at which time the GIS feature for that asset is removed. Therefore, PG&E’s response to this condition uses current protection zone information to create the supporting GIS files. As such, there are differences caused by the changes to the distribution system, since the original data set was created approximately 2 years ago. See the attached GIS files (2020WMP\_ClassB\_PGE-5\_Atch01) for the locations of just over 4,900 miles of the highest priority circuit segments (based on the 2018 analysis). The remaining

Advocates issued a data request to PG&E to obtain more information regarding the utility's response.<sup>11</sup> After analyzing the information received, Cal Advocates may address this issue in its comments on the December 2020 Quarterly Reports.

Without these additional approximately 600 miles of highest priority segment miles mapped in GIS, PG&E's response does not fully address WSD's directive. The WSD should require PG&E to explain whether these circuits are still categorized as "highest priority segment miles" and why PG&E is unable to map them. The WSD should require PG&E to resubmit GIS maps for Condition PGE-5 that include the missing information, as soon as feasible and within no more than 30 days.

**B. The WSD should require PG&E to develop a plan to disaggregate its costs to the individual initiative level to sufficiently address Condition Guidance-5.**

As part of Condition Guidance-5, WSD required PG&E to break out its programs into individual initiatives and report spending on each initiative. PG&E responded that it can only provide WSD with estimates for cost and risk reduction as it "typically tracks costs and files for cost recovery in rate cases at the Maintenance Activity Type (MAT) code level."<sup>12</sup> PG&E's response is woefully inadequate. PG&E does not even claim to have attempted to disaggregate its costs to comply with WSD's condition in the past three months.

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approximately 600 miles of the 5,500 highest priority segment miles originally identified can no longer be accurately mapped because of changes to equipment on PG&E's distribution circuits (namely, that the original start or end point of those high priority circuit segments no longer exists in PG&E's GIS system)." PG&E September 2020 WMP Quarterly Report, p. 109.

<sup>11</sup> Public Advocates Office Data Request CalAdvocates-PGE-R1810007-26, issued September 22, 2020 with responses due October 6, 2020.

<sup>12</sup> "With regard to the updated spend data for each individual initiative, the original method PG&E used for mapping costs to the initiatives was based upon how PG&E typically tracks costs and files for cost recovery in rate cases at the Maintenance Activity Type (MAT) code level. As PG&E has commented previously (in discussions with the WSD before the 2020 WMP submission date, in our 2020 WMP, in our comments on the Draft Resolutions, and in our July 13 Letter on programs that cannot be disaggregated), PG&E does not have these MAT codes and work activities organized by the WSD-defined initiatives. Given the direction provided in this condition, PG&E has undertaken analyses to estimate the cost, risk reduction benefit, and other details for each WSD-defined initiative. The methodologies used to estimate these details by WSD-defined initiatives are described below." *Pacific Gas and Electric Company's Quarterly Report on 2020 Wildfire Mitigation Plan for May to July 2020*, September 9, 2020 (PG&E September 2020 WMP Quarterly Report), pp. 29-30.

The WSD should require PG&E to explain its plan to disaggregate its costs to the individual initiative level to sufficiently answer Condition Guidance-5. PG&E should be required to submit this information within 30 days.

**C. The WSD should require PG&E to provide updates on its quality assurance results for its enhanced vegetation management program.**

As part of Condition PG&E-19, the WSD required PG&E to explain its low pass rate on quality assurance checks of enhanced vegetation management in its 2019 WMP. PG&E explains that in 2019 its first-pass rate held near 60 percent due to training gaps, lack of coordination between verification teams and pre-inspectors (leading to verification of work that had yet to be performed), and an expansion of scope for the enhanced vegetation management program.<sup>13</sup> PG&E explains its strategies to improve its performance, concluding that for 2020, PG&E’s “year to date pass rate is averaging at 88 percent, but since May, [work verification] has been trending monthly at approximately 92 percent or better.”<sup>14</sup>

The WSD should require PG&E to continue to provide updates on its quality assurance results for its enhanced vegetation management program in future Quarterly Reports to highlight process improvements and accountability. If the quality assurance pass rates decline in any quarter, PG&E should explain why and provide a plan to correct the problem.

**D. The WSD should require PG&E to provide an update on incorporating new data sets into its risk modeling.**

In response to part III of the WSD’s Condition PG&E-7, PG&E comments that when assessing the impacts of “LiDAR surveys, inspection results, maintenance tags, and meteorology data sets as inputs to risk modeling,” the utility plans on incorporating them into its “2021 WMP if they are shown to improve current capabilities.”<sup>15</sup> The WSD should ensure that PG&E’s 2021

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<sup>13</sup> PG&E’s enhanced vegetation management scope was changed to “assess all strike trees regardless of species, but only remove those that are hazard trees.” PG&E September 2020 WMP Quarterly Report, p. 165.

<sup>14</sup> “Although PG&E did not set a first pass rate goal of 92 percent as part of the EVM 2020 plan, performance has been trending much higher than in 2019. Our year to date pass rate is averaging at 88 percent, but since May, WV has been trending monthly at approximately 92 percent or better.” PG&E September 2020 WMP Quarterly Report, p. 167.

<sup>15</sup> “PG&E is working to incorporate LiDAR surveys, inspection results, maintenance tags, and meteorology data sets as inputs to risk modeling, to increase accuracy of predictions. We will assess the impacts of these measures in 2020 and incorporate them in the 2021 WMP if they are shown to improve

WMP follows through on this commitment. PG&E should analyze these new methods, explain whether or not the utility decided to incorporate them, and present the reasons why it made its decisions.

**E. The WSD should require PG&E to provide ongoing updates on efforts to reduce reliance on de-energization.**

As part of Condition PG&E-24, the WSD required PG&E to describe how it intends to expand its prioritization capabilities in targeting mitigation activities. PG&E states:

As more system hardening work is completed on a given electric line, the number of circuit segments that could be excluded from a predicted PSPS footprint will increase. In order for a segment of electrical line to be excluded from the predicted PSPS footprint, the entire segment would need to be hardened.<sup>16</sup>

Cal Advocates issued a DR to PG&E to obtain more detailed information regarding the utility's response.<sup>17</sup> After analyzing the information received, Cal Advocates may address this issue in its comments on the December 2020 Quarterly Reports

Given the premise that PG&E's current method of prioritizing circuits segments can reduce the scope of future de-energization events, PG&E should provide evidence of how its system hardening work has improved safety and reduced reliance on de-energization. The WSD should direct PG&E to provide metrics that demonstrate the utility's progress, such as the number of customer accounts and circuit miles previously subject to a de-energization event which have been hardened such that they can remain energized during future events. This will allow the WSD and parties to assess the effectiveness of PG&E's circuit hardening programs in concrete terms. The WSD should require PG&E to provide updates on its progress in reducing reliance on de-energization in each subsequent Quarterly Report.

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current capabilities." PG&E September 2020 WMP Quarterly Report, p. 122.

<sup>16</sup> PG&E September 2020 WMP Quarterly Report, p. 196.

<sup>17</sup> Public Advocates Office Data Request CalAdvocates-PGE-R1810007-26, issued September 22, 2020 with responses due October 6, 2020.

## V. SCE

### A. The WSD should require SCE to steadily reduce incidents and ignitions that are attributed to unknown or unspecified causes.

SCE's RSE model uses a 5-year average of incidents and ignitions from 2015-2019 as a baseline.<sup>18</sup> The average number of incidents on distribution circuits in high fire risk areas (HFRA)<sup>19</sup> is 4,833.4, and the average number of ignitions in the same circuits is 35.6.<sup>20</sup> Of these, 1,928 distribution incidents (40 percent) and 4.8 distribution ignitions (13.5 percent) are due to unknown or unspecified drivers.

The significant percentage of ignitions at the distribution level for which the driver is "unknown/unspecified" is problematic because SCE cannot mitigate ignitions without knowing the cause. Of the 19 activities included in SCE's RSE model, only Undergrounding Overhead Conductor is expected to mitigate ignitions attributed to unknown/unspecified drivers.<sup>21</sup> SCE plans to underground 17 miles from 2020 through 2022, out of 9,827 miles in the HFRA,<sup>22</sup> so this is not anticipated to have a significant impact on ignitions caused by unknown/unspecified drivers.

The WSD should require SCE to include an update on its efforts to determine the causes of faults and fires accurately in SCE's 2021 and 2022 WMP updates. In response to a data request from Cal Advocates, SCE outlined the key steps it is taking, which include improved training, new situational awareness tools, new ignition investigation programs, and new tools to standardize post-failure data collection.<sup>23</sup> SCE should demonstrate a reduction in the proportion of incidents and ignitions attributed to unknown/unspecified drivers each year.

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<sup>18</sup> SCE September 2020 Quarterly Report, Guidance-1 Appendix D, worksheet "Table 11&18 map."

<sup>19</sup> SCE uses its maps of High Fire Risk Areas for wildfire mitigation planning purposes. SCE's HFRA designations include the Commission-designed HFTD and a small additional area: "SCE retains a small portion of HFRA located outside of the CPUC's HFTD (SCE's non-CPUC HFRA), and operationally treats these areas as Tier 2." SCE 2020-2022 Wildfire Mitigation Plan, p. 27.

<sup>20</sup> SCE September 2020 Quarterly Report, Guidance-1 Appendix D, worksheet "Table 11&18 map."

<sup>21</sup> SCE September 2020 Quarterly Report, Guidance-1 Appendix D, worksheet "M02."

<sup>22</sup> SCE September 2020 Quarterly Report, Guidance-1 Appendix D, worksheet "M02."

<sup>23</sup> SCE's response to data request CalAdvocates-SCE-2020WMP-04, Question 003.b, submitted September 23, 2020. SCE has posted its responses to the data request on its website at <https://www.sce.com/safety/wild-fire-mitigation>. Responses are available for download: <https://www.sce.com/sites/default/files/AEM/Data%20Requests/CalAdvocates-SCE-2020WMP-04%20Q.%20001-006%20Answers.zip>.

**B. The WSD should require SCE to provide more detail on its plans to replace non-exempt hot line clamps.**

In response to Condition SCE-8, “Lack of detail on hotline clamp replacement program,” SCE states that it does not have a separate program to replace hot line clamps. According to SCE, it inspects and remediates at-risk connectors as part of its inspection and maintenance programs.<sup>24</sup> SCE further states that the types of hot line clamps it uses or has historically used are “commonly” exempted per the California Department of Forestry and Fire Protection’s (CAL FIRE) Fire Prevention Field Guide.<sup>25</sup>

The WSD should require SCE to include more detail on its hot line clamps, including the number of non-exempt hot line clamps currently in service in SCE’s HFRA, and whether SCE’s current procedures prohibit new installation of non-exempt hot line clamps in its HFRA. SCE should also explain how it mitigates the risk posed by non-exempt hot line clamps. SCE should submit this information in its December 2020 Quarterly Report.

**VI. SDG&E**

**A. The WSD should require SDG&E to propose a plan to collect recruiting metrics per Condition Guidance-11.**

Condition Guidance-11 requires that the electrical corporations provide additional detail on their plans to address personnel shortages that may affect the utility’s ability to implement its WMP. Subpart III requires that the electrical corporation provide “its metrics to track the effectiveness of its recruiting programs, including metrics to track the percentage of recruits that are newly trained, percentage from out of state, and the percentage that were working for another California utility immediately prior to being hired.”<sup>26</sup>

In response, SDG&E states that “SDG&E does not currently track the metrics related to the effectiveness of its recruiting programs.”<sup>27</sup> This response is insufficient. The WSD should require SDG&E to outline a plan to develop and collect the metrics required in Guidance-11. SDG&E should provide this information in its December 2020 Quarterly Report.

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<sup>24</sup> SCE September 2020 Quarterly Report, SCE-8, p. 214.

<sup>25</sup> SCE September 2020 Quarterly Report, SCE-8, p. 214.

<sup>26</sup> Resolution WSD-002, p. 31.

<sup>27</sup> *San Diego Gas & Electric Company’s Quarterly Report on 2020 Wildfire Mitigation Plan for Q3 2020* (SDG&E September 2020 WMP Quarterly Report), p. 60.

**B. SDG&E’s plan to measure the efficacy of enhanced tree trim clearances should evaluate whether there is a causal relationship between increased tree clearances and fewer ignitions.**

SDG&E’s Quarterly Report provides an update on Condition SDGE-13, which requires a plan from SDG&E to compare “areas with and without enhanced post-trim clearances to measure the extent to which post-trim clearance distances affect probability of vegetation caused ignitions and outages.”<sup>28</sup>

SDG&E provides additional detail on how it will measure the incremental risk reduction achieved by increasing post-trim clearance distances beyond the 12 feet recommended in General Order 95. SDG&E grouped trees within its historical database for which it had a recorded post-trim clearance, and measured the number of vegetation contacts for each clearance distance, normalized by contacts per 1000 trees.<sup>29</sup> The data provided by SDG&E indicates that increasing the post-trim clearance is correlated with fewer vegetation contacts.<sup>30</sup> However, the difference in contact frequency between trees trimmed to 12-20 feet and trees trimmed to greater than 20 feet is minimal.

SDG&E’s showing here is an improvement over that in its WMP<sup>31</sup> and Remedial Compliance Plan.<sup>32</sup> However, correlation does not imply a causation. Besides clearance distance, there are numerous other relevant variables that may affect vegetation contacts, such as tree species, tree health, local topography, local wind conditions, drought conditions and pole height.

SDG&E should take additional steps to address whether post-trim clearances are causal to the lower rate of vegetation contacts. This could be achieved through a regression analysis considering multiple factors which may be related to a decrease in vegetation contacts.

For example, SDG&E’s study of post-trim clearances only looks at vegetation contacts within the HFTD, which is appropriate. However, the bulk of the wildfire risk mitigation work

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<sup>28</sup> Resolution WSD-005, p. 38.

<sup>29</sup> SDG&E September 2020 WMP Quarterly Report, Figure 16, p. 127.

<sup>30</sup> SDG&E September 2020 WMP Quarterly Report, Figure 17, p. 128.

<sup>31</sup> *San Diego Gas & Electric Company Wildfire Mitigation Plan*, (Rev 1.), March 2, 2020, p. 122.

<sup>32</sup> *San Diego Gas & Electric Company’s 2020 Wildfire Mitigation Plan Remedial Compliance Plan*, July 27, 2020, p. 5.

performed by SDG&E takes place in the HFTD, and other mitigation initiatives occurring in the same locations may confound the analysis of vegetation contacts. The number of contacts within the HTFD could correlate to any number of differences such as pole type, pole height, line spacing, or other factors. A more sophisticated analysis would help to clarify whether other factors are responsible for any reduction of vegetation contact risk that SDG&E currently attributes to the implementation of increased post-trim clearances.

In response to a data request, SDG&E provided additional information to Cal Advocates on September 17, 2020, regarding SDG&E's historical vegetation contacts and vegetation management practices. Cal Advocates is currently analyzing this information.

The WSD should require SDG&E to submit an updated response to Condition SDGE-13. SDG&E should promptly submit a revised research plan that shows how SDG&E will address the questions raised here and in Cal Advocates' comments on SDG&E's remedial compliance plan.<sup>33</sup> As soon as possible, SDG&E should provide the initial findings of its analysis of the causal impact of post-trim clearances on the risk of vegetation contact.

Moreover, SDG&E has yet to fully demonstrate compliance with Decision (D.) 19-05-039.<sup>34</sup> The WSD should hold SDG&E accountable for its non-compliance.<sup>35</sup> SDG&E must comply with the Commission's orders by providing detailed guidelines for the application of the increased post-trim clearances, including but not limited to the additional empirical data provided by SDG&E in its Remedial Compliance Plan and Quarterly Report.

## **VII. CONCLUSION**

Cal Advocates respectfully requests that the Wildfire Safety Division adopt the recommendations discussed herein.

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<sup>33</sup> *Comments of the Public Advocates Office on San Diego Gas & Electric Company's 2020 Wildfire Mitigation Plan Remedial Compliance Plan*, August 10, 2020, pp. 3-4.

<sup>34</sup> D.19-05-039, *Decision on San Diego Gas & Electric Company's 2019 Wildfire Mitigation Plan Pursuant To Senate Bill 901*, in Rulemaking (R.) 18-10.007, Ordering Paragraph 5 at pp. 29-30, "San Diego Gas & Electric Company may implement a 25-foot post-trim clearance where necessary and feasible if such a practice is supported by scientific evidence or other data showing that such clearance will reduce risk under wildfire conditions."); Ordering Paragraph 6 at p. 30 ("In San Diego Gas & Electric Company's next Wildfire Mitigation Plan, it shall propose detailed guidelines for where a 25-foot post-trim clearance for vegetation management is both feasible and necessary.").

<sup>35</sup> *Comments of the Public Advocates Office on San Diego Gas & Electric Company's 2020 Wildfire Mitigation Plan Remedial Compliance Plan*, August 10, 2020, pp. 5-7.

Respectfully submitted,

/s/ *Diana L. Lee*

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Diana L. Lee  
Deputy Chief Counsel

Public Advocates Office  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102  
Telephone: (415) 703-4342  
E-mail: [Diana.Lee@cpuc.ca.gov](mailto:Diana.Lee@cpuc.ca.gov)

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