

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

Wildfire Safety Division
California Public Utility Commission

**COMMENTS OF THE GREEN POWER INSTITUTE ON
DRAFT RESOLUTION WSD-011**

November 2, 2020

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Pursuant to the October 12, 2020, Draft Resolution WSD – 011, the Green Power Institute, the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security (GPI), provides these *Comments of the Green Power Institute on Draft Resolution WSD-011*.

Introduction

GPI generally supports Draft Resolution WSD-11. We provide comments that are organized according to the WMP Guidance and Performance Metrics Data Templates, the Maturity Model, and the updated WMP Process. GPI recommendations are numbered sequentially in the comments below.

Our biggest concerns and accompanying recommendations include: (1) a deep dive into the SHEUR method and other WMP initiative optimization and prioritization methodologies; (2) a paradigm shift regarding VM residue management, the definition of vegetation residue management best practices, and its designation as an WMP “capability” that is separate from VM capabilities; and (3) updates and corrections to the structure of WSD-011 that improve clarity.

Comments on WSD-011 specifics

WMP Guidance and Performance Metrics Data Templates

Draft Resolution WSD-011 includes summaries and detailed recommendations on the WMP guidance in WSD-011, Attachment 1: Analysis and recommendations on Wildfire Safety Advisory Board (WSAB) recommendations, and Attachment 2.1: Changes to Wildfire Mitigation Plans Guidelines for 2020-2022. The complete, updated guidance is provided in Attachment 2.2: 2021 Wildfire Mitigation Plan Guidelines Template. The multiple summaries and attachments each partially address substantial and structural

changes to the WMP Guidance that are at times redundant and difficult to track across documents.

- (1) GPI recommends providing references within Attachment 1 to where each accepted WSAB recommendation is implemented in Attachment 2.1: Changes to Wildfire Mitigation Plan Guidelines, as well as cross reference corresponding sections in Attachment 2.2: 2021 Wildfire Mitigation Plan Guidelines Template, Attachment 2.3 WMP Quarterly Report – non-spatial data template, and Attachment 2.4: 2021 Maturity Model within recommendations in Attachment 1 and 2.1.

WSAB Recommendation 4.1

WSAB recommendation 4.1 to “Develop and Electric Utility Resiliency and Risk Reduction Threshold” (WSD-011 Attachment 1) called the SHEUR threshold, would enact substantial changes to the way Utilities and the ITOs perform wildfire mitigation planning and prioritize granular mitigation initiatives and activities. Draft Resolution WSD-011 did not elect to adopt the SHEUR method at this time in favor of additional collaborative development (WSD-011 Attachment 1, p. 15). They also state that “development of new metrics that tie risk to cost is better addressed in S-MAP proceeding, as implications go beyond WMPs.”

Based on the staff-proposed SHEUR method, the approach would include optimizing the location of risk reduction activities in order to minimize wildfire risk and mitigation impacts on customer electric service. The WSD frames the SHEUR method as resulting in “new metrics that tie risk to cost.” This is a narrow view of the benefits of analyzing and optimizing risk mitigation efforts at a higher granularity. Optimizing mitigation efforts at appropriate granularities for each WMP initiative could result in a more rapid decline in “near-misses,” “risk events,” and “ignitions” each year, as well as more rapidly minimize the impacts of PSPS on customers. These motivations are well within the WMP, and are only accompanied by the added bonus of lower costs due to more targeted and efficient wildfire mitigation initiative implementation. This approach would also

contrast the Utilities' current broad-brush approach where mitigation efforts are not clearly linked to risk drivers and granular risk assessment beyond HFTDs.

While approving plan cost is out of scope for the WSD and WMP process, cost cannot be fully disaggregated from assessing whether the proposed WMPs are effective or efficient. That is, customers should not be charged for inefficient WMPs that come at a high cost yet provide relatively poor wildfire mitigation results and compromise reliable electric service. Based on the 2020 WMPs it is not clear whether plans are entirely effective or efficient in terms of risk mitigation and cost. We also assume that the review of WMP costs within the GRC relies heavily on the WSD's review and approval of each WMP as a metric for determining whether the WMPs are efficient and cost-effective, and warrant the cost. If the WSD review is unable to assess whether a plan is effectively and efficiently deploying wildfire mitigation activities to minimize wildfire risk, it follows that the GRC is also unable to determine if the plans are cost effective.

- (2) Developing a granular WMP initiative optimization and prioritization model, whether it takes the form of the SHEUR method or another modeling approach, would first and foremost serve to minimize wildfire risk and customer impacts, and secondarily inform and justify WMP cost. GPI strongly recommends the WSD and WSAB revisit the SHEUR method, or other granular risk assessment and mitigation optimization methods in the near future in order to drive and assess the efficiency and effectiveness of ignition and wildfire risk mitigation at a more granular level.

Vegetation Management – Best practices

In the 2020 WMPs, “best practices” for vegetation management residues often referred to as “business-as-usual” approaches, including lop and scatter practices, and chipping. However, a profound increase in tree removal and trimming residues is anticipated due to standard vegetation management (VM) practices combined with enhanced vegetation management (EVM) clearances and more aggressive tree removal plans and programs. GPI proposed the need for more sustainable VM residue removal practices that both reduce the amount of forest fuel buildup from VM and EVM activities and treat the residues as forest products with positive revenue streams (e.g. biomass generation, particle

board/pellet production). This approach would comprise one aspect of sorely needed, more comprehensive WMP fuels-management programs that reduce ignition and wildfire consequence risk.

The WSAB proposed recommendation 3.5 “Aligning Vegetation Management Practices with Best Available Science” and advocated that “The 2021 WMP Guidelines should require the utilities to develop explicit vegetation management residue plans that ensure that vegetation management itself does not contribute to increased fuel load and increased risk of fire (Attachment 1, p. 12).” The corresponding WSD recommendation states “Utilities should provide evidence that they are using best vegetation management practices and detail a plan for how they handle residues (e.g., how utility manages relations with property owners during tree removal) (Attachment 1, p. 12).” It follows that the definition of “best vegetation management practices” will drive expectations for VM residue management in the WMPs.

The maturity model and maturity level rubric currently serve as the guiding document defining WMP “best practices.” The treatment of VM residues and associated definitions for “best practices” is addressed under maturity model capabilities 24. “Vegetation grow-in mitigation” and 25. “Vegetation fall-in mitigation (Attachment 2.4, p. 34-35).” Within capabilities 24 and 25, VM residue management per each maturity level is defined as:

Maturity Level 0: “Utility does not remove vegetation waste along right of ways.”

Maturity Level 1: “Utility i) removes vegetation waste along right of ways ii) within 1 week of cutting vegetation across entire grid”

Maturity Level 2: “Utility iv) removes vegetation waste outside of right of ways v) within 3 days of cutting vegetation across entire grid, and vi) works with landowners to ensure wood removed from potential ignition areas.”

Maturity Level 3: “Utility i) removes vegetation waste along right of ways ii) on same day as cutting vegetation.”

Maturity Level 4: “Utility i) removes vegetation waste along right of ways on ii) same day as cutting vegetation; iii) utility collaborates with local landowners to provide a use for cutting vegetation across entire grid; iv) utility works with partners to identify new cost-effective uses for vegetation waste and v) takes into consideration environmental consequences and emissions of vegetation waste.”

The maturity assessment rubric defines that Level 1 is commensurate with meeting minimal expectations, while Level 4 is consistent with “improvement over current best practices (Appendix 2.4, p. 1).” Based on this designation there are systemic flaws in the way VM residue management methods and “best practices” are treated in the maturity model that will hinder forward progress and, may negatively affect fuels management within the WMPs.

First, the maturity assessment refers to VM residues as “vegetation waste.” This language implies that VM residues only have a negative value or cost and are not considered forest products with the potential to generate positive revenue. This paradigm hinders sustainable VM residue management approaches that can treat VM residues as forest products with end-uses such as biomass generation, and particle board and pellet production. These end uses have positive value revenue streams that can support VM residue and forest fuel management programs.

- (3) GPI urges the WSD to reword the maturity model definitions in Capabilities 24. and 25. to “vegetation residues” in place of “vegetation waste.” This wording change recognizes the potential value of VM residues as forest products with applications and positive revenue streams, versus a “waste” product that comes at a cost. This paradigm shift is needed to align the treatment of VM residues and best-practices with the overarching WMP vision to achieve “sustainability.”

The second flaw is that best-practices for VM residue management are embedded in capabilities defining VM initiatives. GPI has repeatedly noted that the 2020 WMPs lacked adequate fuels management programs. This includes VM residue management as a subset of fuel production that results from planned VM, EVM, and tree removal initiatives. Our review of WMP filings and the first quarter reports also revealed a general

lack of fuels risk assessment in terms of ignition and wildfire consequence. This trend is concerning and should be regarded as a major shortcoming of the WMPs. The decision to not include fuels assessment and management as a separate WMP capability and nest VM residue management under WMP capabilities 24 and 25 only perpetuates this shortcoming. That is, nesting VM fuels management activities under VM and tree removal capacities keeps the focus on vegetation residue production and only considers fuels management as a subset and afterthought to production. It also overlooks other fuels management activities that address natural fuel build-up processes. GPI is concerned that the Utilities can qualify for higher VM maturity rankings based on VM capability alone, while their VM residue and other fuels management programs are overlooked and continue to fall behind.

- (4) The GPI recommends adding a new “Fuels risk and management” capability to the maturity model that includes: (i) assessing ignition and wildfire risk and consequence as a function of both natural and VM induced fuels build-up; (ii) VM residue management program best practices that acknowledge the risk of VM residues, as well as their value as forest products and directs the WMPs to develop more sustainable management plans; and (iii) Fuel management programs that mitigate wildfire risk due to the natural production of fuels, and adopt the same forest product paradigm as (ii) above. Adding this new capability will only improve the ability for the maturity assessment to inform and drive WMP progress in fuels management and risk analysis. It will not substantially impact year-over-year comparisons between VM or other WMP capabilities in the current 3-year WMP cycle.

Lastly, GPI expects the maturity model definition of fuels and VM management best practices to continue to progress as per the WSD proposal to update the maturity model rubric every three years to reflect the most up-to-date “best practices.” However, we urge the WSD to implement the above recommendations in this iteration of WMP updates in order to initiate a paradigm shift and ensure fuel risk assessment and management, including the management of VM residues, are not marginalized for another two years.

New WMP Section 2: Adherence to statutory requirements and new WMP Appendix

Multiple sections in WSD-011 Appendix 1 and 2.1 address compliance and new reporting requirements that relate the WMPs with statutory requirements. The GPI generally supports the proposed updated WMP requirements including:

WSAB recommendation 1.2 (Attachment 1, p. 5) which states “State and Federal Rules and Requirements Should Be Included and Explained in the Narrative of WMPs” and the WSD response that implements it, stating:

- **Recommendation incorporated**, with adjustments
- Relevant state and federal statutes, orders and proceedings must be cited where relevant in WMP narrative, and explained in a new WMP Appendix section and WSD recommendation 9a to include California and Federal rules and orders related to the WMP (Attachment 2.1, Section I/H, p. 28) in a WMP appendix a.
- In the WMP appendix, utilities should include a brief description or summary of the relevant portion of the statute (Appendix 1, p. 5)

WSD recommendation 9a and the “New WMP Directive: Citing relevant statutes and orders in narrative and initiatives (Appendix 2.1, p. 28)” and which states:

- **Recommended change 9a:** Throughout the WMP, cite relevant state and federal statutes, orders, and proceedings (title of statute in parentheses next to comment, or placed in relevant area in table), with a brief description or summary of the relevant portion of the statute provided in the appendix.

WSD Recommendation 2a to include a new Section 2: Adherence to Statutory Requirements (Attachment 2.1, Item B, p.7) and checklist regarding WMP statutory requirements and compliance.

However, tracking these WSAB and WSD recommendations and changes throughout the WSD-011 Appendices and their implementation is difficult and confusing. GPI recommends the following adjustments:

- (5) Change the new Section 2 title to read “Section 2. Adherence to Section 8386(c): Statutory WMP components,” in order to avoid confusion with Recommendations 9a and the proposed new Appendix regarding statutory state and federal rules and orders relating to the WMP.
- (6) Item I. in Appendix 2.1 should be renamed “I. NEW Appendix: State and Federal Rules and Requirements and NEW WMP Directive to Cite Relevant Statutes, Orders, and Scientific References,” in order to avoid confusion with new WMP Section 2 (Appendix 2.1, p. 7).
- (7) The alphabetical section labeling in Appendix 2.1 is off set starting at Section 7 (p. 24) and should be remedied so that the table of contents and section headers align.
- (8) Add a new Recommendation 9a (Section I., Appendix 2.1, p. 28) that explicitly outlines the requirement to add the new WMP Appendix proposed by the WSD to address WSAB Recommendation 1.2 (Appendix 1, p. 5). Existing Recommendation 9a should become Recommendation 9b (Appendix 2.1, p. 28), requiring in text citations to “relevant state and federal statutes, orders, and proceedings.” The updated Recommendation 9b should also require WMPs to include in-text citations that provide the location of the referenced statute in the new WMP Appendix.

GPI also supports WSAB Recommendation 3.3 “Reporting Expert Qualifications and Scientific Justification for Decision-Making (Attachment 1, p. 10-11).” The WSD response: “Recommendation **incorporated** by requiring qualifications of experts and citations to relevant scientific research in WMP” is only partially incorporated in Appendix 2.1 and Appendix 2.2. GPI recommends the following:

- (9) Add a “Recommendation 9c” in Appendix 2.1 (p. 28) clarifying the requirement to include “citations to relevant scientific research in WMP.” Include this requirement in Section 9 “Appendix”, or the introductory instructions of the 2021 Updated WMP Guidance Template (Appendix 2.2).
- (10) Appendix 1 should cite the location of all corresponding updates/changes/recommendations within Attachment 2.1: Changes to

Wildfire Mitigation Plan (WMP) Guidelines, and where they are implemented in Attachment 2.2, 2.3, 2.4, 3, and 4.

- (11) Confirm all New Sections, Appendices, WMP and CPUC Directives, and adopted WSAB and WSD recommendations are explicitly defined within the 2021 Wildfire Mitigation Plan Guideline Template such that it serves as a standalone document and complete guide for WMP preparation (e.g. See also GPI recommendation (7) and (8)).

We also note that the quality of the 2020 WMP narrations was generally low on account of vague descriptions and equivocal language. While the new Section 2 may help reviewers track compliance, it remains to be seen if this will improve the “instances where information was lacking (Appendix 2.1, p. 7)” and quality of the WMP narrations and compliance overall. We anticipate that changes to the narration guidelines, such as the new requirements for describing models and studies, will be more effective at improving the quality of the WMP narrations.

Section 4: Lessons Learned and Risk Trends

Attachment 1 suggests that the WSD “...Recommendation to create a separate section for Lessons Learned” partially addresses WSAB recommendation 1.1 that the WMPs should include a “...focus on lessons learned” and “Each of the Wildfire Mitigation Program sections of the 2021 WMP Guidelines start with lessons learned (Attachment 1, p . 5).” The corresponding WSD Issue/Recommendation in Appendix 2.1 states:

Section 4 in the WMP currently serves as a catch-all for narrative and reporting of trends. Section 4 should be more focused to improve the evaluation process. Moreover, relevant narrative portions to risk trends, such as “Lessons learned” were either missing or placed within the larger narrative portion of Section 2, Metrics...

Recommended Change 4.a: Move “Lessons Learned” into Section 4 with no changes to the instructions (Appendix 2.1, p 11).

GPI agrees that it is important to detail and incorporate Lessons Learned in the WMP to ensure the ongoing critical evaluation of plan components such as methods and

assumptions that ultimately inform wildfire risk mitigation initiatives. We are concerned, however, that the proposal to move the “lessons learned” narrative to Section 4 but retain the generalized wording may lead to vague responses, or responses that are difficult to correlate with specific initiatives and metrics. Simply moving a narration prompt from one section to another in the updated 2021 WMP Guidelines is unlikely to provide more useful content.

- (12) Update the wording in Section 4.1 of the 2021 Wildfire Mitigation Plan Guideline Template (Appendix 2.2, p. 24) to include specifics on “Lessons Learned” narrations. For example, provide lessons learned for each initiative that was implemented in the previous year, including on aspects such as resources required to implement the initiative and its impact on wildfire mitigation. WMPs should also narrate how lessons learned are informing next steps and future plans.

GPI supports the decision to refine the WMP requirements regarding research proposals/reports and model descriptions. We provide the following additional recommendations and wording changes (in italics):

- (13) Changes to “Recommendation 4e. (Appendix 2.1, p. 11)”: Heading 6. Results, should be broken into a separate “Results and Discussion” section, and a “Conclusions” section. The last heading should be re-titled “Next Steps.” These sections more closely resemble the standard sections included in academic research proposals/reports and will produce clearer narrations. GPI recommended wording changes to Appendix 2.1 (p. 11) and the corresponding section 4.4.2 in the 2021 WMP Guideline Template Section are in italics:

Recommended Change 4e.

1. Purpose of research
2. Definition of relevant terms...
3. Details of all data sources... *All references to data, including model outputs should be accompanied by quantitative data summaries and/or access to raw data.*
4. Methodology for analysis...
5. Project timeline...

6. *Results and Discussion (Include new results if an ongoing study, and summarize all results if a completed study)*
7. *Conclusions (Include implications for initiatives or wildfire risk mitigation, and any changes to previous findings/conclusions)*
8. *Next Steps (Follow up research or action planned as a result of the research and conclusions)*

In the future, hosting accompanying data in the proposed Data Portal would support expert review of WMP research proposals/reports.

(14) Changes to “Recommendation 4f. (Appendix 2.1, p. 12)” and corresponding 2021 WMP Guideline Template Section 4.5.1:

Heading 1. “Purpose of Model” should clarify: “Briefly summarize the context and goals of the model including which wildfire risk mitigation activities/initiatives it informs.”

Heading 3. “Data elements” should provide links or in-text citations regarding where the data can be accessed, to the extent possible, and detail it is public or confidential. WMP reviewers should be able to find and reference the data inputs based on the updated narration and “Data Elements” content. This will allow external expert review by researchers and CPUC staff. Without easy access to the data, the example “Data Element” table may have limited value and the corresponding modeling results and interpretations must be taken at face value. The proposed Data Portal would improve access to data inputs/elements in the future.

Add a new Heading 5: “*Model Outputs/Results and Discussion - Describe model outputs and provide access to quantitative model outputs, or output summaries to the extent possible.*” In the future, reviewers would benefit from accessing model outputs stored in a Data Portal as proposed by the WSAB. Public access to model outputs would allow experts to vet models, model outputs, and output interpretations, and ultimately provide novel insight into wildfire mitigation approaches.

Add a new Heading 6: “*Model Uncertainty – Provide information on model output uncertainty based on data inputs, and model assumption. Explain how uncertainty is*

accounted for in the model outputs and output interpretation and application.” Models and their outputs **must** include uncertainty evaluation and metrics, respectively, to appropriately inform model-based decision making.

“Timeline” should become heading 7. Heading 8 should become “*Conclusions and Applications*”

- (15) Add “HFTD Zone 1 and Tier 2-3 annual number of circuit miles and customers” data to WMP data tables and Recommendation 4g. (Attachment 2.1 p. 13). These numbers are required to normalize and compare data disaggregated by HFTD Zone 1 and Tiers 2-3.

Section 6: Performance Metrics and Underlying Data

- (16) We were unable to easily correlate Table 3, Table 4.1, and Table 5.2 in the 2021 WMP Guidelines Template (Attachment 2.2, p. 36-38) with the WMP Excel data template (Attachment 2.3) based on Table number. These tables most closely align with Table 6, Table 7.1, and Table 7.2 in the Excel data template. We did not conduct an exhaustive review alignment between table identifiers in Appendices 2.1, 2.2, and 2.3. GPI recommends reviewing all Table identifiers for accuracy and using Section-Table identifiers for all tables (e.g. Table 6-1 to denote Table 1 in Section 6) so that it is easy to align both narration embedded tables (i.e. in Attachment 2.2) and excel tables (i.e. in Attachment 2.3) with the corresponding data table descriptions and instruction and located in the WMP Guideline Template.

Section 7: Mitigations

The WSAB recommended “The 2021 WMP Guidelines should require utilities to complete an RSE analysis for each mitigation measure, at a circuit level... (Appendix 1, p. 7).” The corresponding WSD recommendation states “Recommendation to improve RSE analysis in allocating mitigation resources at a circuit level was **incorporated.**” However, the actionable recommendation described in Attachment 2.1, Recommended Change 7f. requires reporting the RSE as three numbers: RSE in HFTD Tier 3 areas, RSE in HFTD Tier 2 areas and RSE in non-HFTD regions (Attachment 2.1, p. 25). While analyzing RSE at the granularity of HFTD is an improvement, it is not synonymous with analysis at

a circuit level as recommended by the WSAB. GPI provides the following recommendations:

- (17) Update the WSD recommendation corresponding to WSAB Recommendation 2.1 (Appendix 1, p. 7) to reflect “partial incorporation” regarding RSE determinations at a circuit level. It is important to reflect the current RSE requirement as a partial incorporation of the WSAB recommendation since wildfire mitigation efforts may benefit from actual circuit level RSE values in the future.
- (18) Update WSD Recommended Change 7f to include “Estimated RSE in HFTD Zone 1” and reflect the 4 RSE values included in Table 12.

New WMP Section 8: Public Safety Power Shutoff and Directional Vision

The description of Item G. New Section 8 (Appendix 2.1, p. 26-27) includes referencing errors. We also recommend data additions:

- (19) Appendix 2.1 (p. 26) Recommended Change 8a incorrectly references Table 12. It should instead reference Table 11 in WSD-011 Appendix 2.3.
- (20) GPI recommends adding a new data row in Table 11 requiring WMP data to include the total number of circuit miles impacted by PSPSs. The ratio of customers to circuit miles impacted by PSPSs, and values themselves can provide insight on the efficacy of granular PSPS mitigation decision making. For example, the placement of switches, conductor undergrounding, or other system hardening elements can drastically reduce the number of customers affected by PSPS, the number of circuit miles affected, or both.

The division of Item G. Section 8 and Item J (mislabelled as Item I, Appendix 2.1, p. 29; See also GPI recommendation (3) above) into two sections in Appendix 2.1 is confusing and provides guidance for the new Section 8 on PSPS in two disparate locations.

- (21) Combine Item J. “NEW Commission Directive” with Item G. and rename Item G to read “G. NEW Section 8: Public Safety Power Shutoff and Directional Vision; and NEW Commission Directive.” “Recommendation for

Directive 10a” (Appendix 2.1, p. 29) should become “8a”, and adjust all Section 8 Recommendation identifiers accordingly to reflect 8a – 8f.

WSAB Recommendation 3.2

GPI strongly supports WSAB recommendation 3.2: “Development of a Data Access Portal for Interconnected Data Repositories and a Hierarchy of Permission to Access Wildfire Data and Modeling Methods (Attachment 1, p. 10).” The corresponding WSAB Recommendation for 2021 proposes: “Development of a data access portal for interconnected data repositories and permission hierarchy is **to be incorporated following** standardization of data metrics, processing, and analysis (Attachment 1, p. 10).”

(22) GPI recommends developing and implementing a Data Access Portal in 2021, as soon as possible. Data standardization is not a prerequisite to establishing and compiling WMP data in a Data Access Portal. We also suspect that WMP data reporting standards will continue to evolve as the WMP process matures. Delaying the Data Access Portal will only delay the opportunity to improve access to WMP data and support external, expert review.

Maturity Model

The 2020 WMP filings raised concerns about the accuracy of self-scored maturity models. GPI supports the WSD-011 stipulation that “In the 2021 WMP review, the WSD will assess progress on maturity by comparing the utility’s progress from the utility’s 2020 maturity survey, WMP and other data sources, subject to audit and verification (WSD-011, p. 3).” We also support the proposal that “The WSD intends to score the Utility’s projected maturity over the plan cycle...” Maturity model audits and vetting will improve the value of the maturity model assessment.

WMP Process

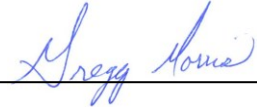
GPI generally supports the proposed changes to the WMP process, in particular the decision to stagger the annual WMP filing dates for IOUs versus SMJUs and ITOs. We provide the following recommendations regarding the proposed WMP Process:

(23) The 2021 WMP filing has been referred to as an annual update, yet the 2021 WMP Guideline Template is on par with the full, three-year 2020 WMP filing. There are currently no clear distinctions between the content expected for a 3-year WMP filing versus the annual WMP Update filings. GPI recommends clarify the difference between the 3-year WMP filing and annual WMP Updates including expectations for WMP narration content. For example, should the 2021 WMP include all content from the 2020 WMPs and responses to the corresponding WSD Resolutions requiring plan updates, or should the annual updated focus on WMP progress, outcomes, and lessons learned to date as a result of the initiatives proposed in the 2020 WMPs.

(24) WSD-011 eliminated quarter report narrations which, in 2020, included remedial compliance narrations for the 2020, 3-year WMP filings. WSD-011 should clarify the approval process for 3-year and annual WMP Updates and the methods and timing for remedial filings. It should also clarify the WMP initiative off-ramp filing schedule and requirements

Dated November 2, 2020

Respectfully Submitted,



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