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Ms. Caroline Thomas Jacobs
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Transmittal via email: wildfiresafetydivision@cpuc.ca.gov and R.18-10-007 service list

RE: MUSSEY GRADE ROAD ALLIANCE COMMENTS ON DRAFT RESOLUTION WSD-011

Dear Director Thomas Jacobs:

The Mussey Grade Road Alliance (MGRA or Alliance) serves these comments pursuant to the instructions in Draft Resolution WSD-011,¹ which provides 20 days for public comment.

MGRA generally supports the Draft Resolution and its proposed changes to the WMP process. We provide comment only in cases where we find factual, legal, or technical errors.

The following Alliance comments were prepared by MGRA's expert witness, Joseph W. Mitchell.

¹ Wildfire Safety Division Resolution WSD-011; October 12, 2020.

MUSSEY GRADE ROAD ALLIANCE COMMENTS ON DRAFT RESOLUTION WSD-011 AND ATTACHMENTS

1. ISSUES IN WSD-011

1.1. Shortcomings in the Utility Wildfire Maturity Model

In several filings and submissions throughout the 2020 WMP process, MGRA has highlighted issues with the Utility Wildfire Maturity Model (Maturity Model). The most comprehensive analysis of this model that MGRA presented was in its December 30, 2019 comments on the wildfire mitigation plan templates.² This analysis made the following observations:

- The Utility Wildfire Maturity Model's framework is soundly based on existing process improvement methodology.
- There are no major gaps in the coverage of the Maturity Model.
- Some of the tracking variables in the Maturity Model were not chosen appropriately and may lead to erroneous conclusions.
- Lack of domain knowledge is exhibited in some of the Maturity Model questions.
- In some cases the Maturity Model conflates information and data, and provides higher scores for collecting more data attributes or more frequent data collection without regard to the quality or utility of the data.
- The Maturity Model's approach to weather data collection, forecasting, and meteorology exhibits a lack of domain knowledge and some of the questions in this area do not accurately represent a utility's maturity.
- Some of the questions use poorly defined terms (for example, the question related to PSPS thresholds), which will allow utilities to inflate their self-reported maturity scores.

² R.18-10-007; MUSSEY GRADE ROAD ALLIANCE COMMENTS ON WILDFIRE MITIGATION PLAN TEMPLATES; December 30, 2019; pp. 6-12.

- One Maturity Model question that has an inverse correlation with maturity has to do with customer complaint rates, since it would reward utilities that put barriers in the way of complaint and claims reports. MGRA uncovered evidence of PG&E complaint and claims suppression in its analysis of 2019 PSPS events, which we are pursuing in the appropriate proceedings.
- The Utility Wildfire Maturity Model needs to be reviewed with input from stakeholders.

MGRA provided further input on the Maturity Model in its comments on the 2020 Wildfire Mitigation Plans of the major IOUs.³ An additional issue was raised after reviewing the utility WMPs – specifically that the Maturity Model question regarding GO 95 compliance begged an affirmative answer and did not identify whether utilities were constructing, operating, and maintaining their infrastructure to be safe under currently known local conditions.

Our recommendation was summarized in our comments on the Staff Proposal,⁴ in which MGRA once again recommended workshops to analyze the existing Maturity Model and to receive stakeholder input.

The Draft Resolution, however, opts not to review the Maturity model at this time. It states 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”⁵ and that: “There are no recommended substantive changes to the ‘maturity model.’”⁶ While it is true that use of the Maturity Model can provide no added value unless a baseline is set and deviations from that baseline are tracked, if there are to be substantial revisions to the Maturity Model it is best to apply them as soon as possible so that correct and accurate data becomes available before 2023.

³ MUSSEY GRADE ROAD ALLIANCE COMMENTS ON 2020 WILDFIRE MITIGATION PLANS OF SDG&E, PG&E, SCE; April 7, 2020; pp. 65-74.

⁴ RE: MUSSEY GRADE ROAD ALLIANCE COMMENTS ON THE WILDFIRE SAFETY DIVISION STAFF PROPOSALS AND WORKSHOPS; August 26, 2020; pp. 3-4. (MGRA Staff Proposal Comments)

⁵ Draft WSD-011; p. 3

⁶ Id; p. 7.

Accepting the shortcomings and flaws of the Utility Wildfire Maturity Model introduces technical error and reduces WSD's ability to accurately gauge maturity. The Division's reticence to do a full reset on the Maturity Model is understandable, since flawed data and analysis is better than none at all. However, this does not need to be the choice. Applying a "scaffolding" approach, new questions can be added to the Maturity Model that refine or supplement existing questions, and which might later be used to replace those questions. This approach would entail:

1. WSD would solicit input on the current Maturity Model from stakeholders.
2. WSD would hold stakeholder workshops to identify problematic Maturity Model questions.
3. Stakeholders would provide comment on the proposals and workshops.
4. WSD would formulate a list of additional questions to supplement the existing Maturity Model and identify questions that will ultimately be sunset.
5. In the following WMP cycle, utilities would score themselves against both the original and new Maturity Model questions.
6. Once the sunset period is reached (2022 or later), Maturity Model questions flagged as problematic, incomplete, or poorly stated would be removed.

The advantages to this approach are:

1. This process allows utilities to be tracked against the 2020 baseline for the next few years.
2. This process would provide more immediate quality improvement of the Maturity Model by addressing its shortcomings and errors before the next full WMP cycle.
3. By collecting data with both old and new questions, this process would allow a direct "calibration" of Maturity Model data taken with the 2020 baseline and from the improved 202x baseline.

While there may not be sufficient time for this process to be complete in time for the 2021 WMP cycle, the Commission should nevertheless direct WSD to initiate it so that the technical errors introduced by the current version of the Maturity Model are promptly addressed. The Commission should take this issue up immediately, since the next opportunity for review will occur at the end of 2021 and would lead to a similar situation, with insufficient time for review.

Recommendation:

Add to the end of section i. of key changes, pp. 7-8:

WSD will in 2021 direct workshops to determine if additional questions should be added to the maturity model and whether specific questions should be flagged for future revision or removal.

2. ATTACHMENT 2.1: CHANGES TO WILDFIRE MITIGATION PLAN (WMP) GUIDELINES

2.1. Replacement of Wind Conditions Metric

MGRA's noted issues in the definition of the 95th and 99th percentile wind speeds that utilities were to supply to WSD as a weather condition metric and suggested solutions to it.⁷ In its WMP comments, MGRA further noted that this metric was understood and implemented differently by each utility, and that the results were widely inconsistent and possibly misleading.⁸ In fact the analysis and comparison of utility weather data took up a considerable fraction of MGRA's comment on the WMPs. In this light we are pleased to see that WSD has taken steps to require a consistent approach using publicly available methodologies for the reporting of weather conditions, as was suggested in the staff proposal.⁹ In its response, MGRA repeated the issues it had found in its analysis of utility data and suggested that WSD host workshops to determine the most appropriate methodology for wind metrics.¹⁰

In Draft Resolution WSD-011, however, WSD has now made the technical choice of metric. Recommended Change T10c states that "Remove the requirements for '95th / 99th percentile wind conditions' and replace with 'High Wind Warning' as defined by the National Weather Service. While we appreciate WSD's intent to resolve the numerous issues with the way utilities report dangerous weather conditions, the approach of choosing a methodology without stakeholder input and review constitutes legal error.

⁷ MGRA Template Comments; pp. 14-15.

⁸ MGRA WMP Comments; pp. 13-16 and 50-65.

⁹ Wildfire Safety Division Staff Proposal on Changes to Wildfire Mitigation Plan Requirements and Metrics Tables; August 11, 2020; pp. 17. (Staff Report)

¹⁰ MGRA Staff Proposal Comments; p. 4.

Had WSD been considering use of the “High Wind Warning” designation for utility reporting this should have been included in the Staff Proposal so that it could be discussed at the WSD workshop and so that stakeholders could have commented on it. To make a technical decision of this type in a resolution is erroneous procedurally and denies stakeholders (as well as WSD and the Commission) adequate time to respond. It also introduces room for technical error on the part of WSD.

Nevertheless, High Wind Warning is a plausible criterion for extreme utility damage risk. According to the National Weather Service, a high Wind Warning is defined as:

“sustained winds 40 mph or greater, for better than 1 hour - and/or wind gusts 58 mph or greater, for any duration.”

It should be noted that this wind condition is close to that which IOUs claim to be the wind load for wooden pole replacement specified in GO 95 (56 mph).¹¹ As noted in many Commission proceedings, however, gusts in certain areas can reach much higher speeds, and the onus is on the IOUs to ensure that their infrastructure is constructed to operate safely under those conditions.¹²

One area of concern is that High Wind Warnings are issued by local NWS offices,¹³ and it would be appropriate due diligence to ensure that all offices follow exactly the same criteria for applying a HWW designation to a geographic area in order to ensure the service areas of all IOUs are treated identically.

This and other areas of specific technical concern should be addressed through collaborative workshops held annually as part of the WMP cycle.

¹¹ SED claims that the appropriate wind loading would be 92 mph. The Commission has not made a determination on this question.

¹² D.14-02-015; p. 70: “electric utilities and CIPs shall continue to comply with the Rule 31.1 requirement to design and construct their facilities based on known local conditions, including Santa Ana windstorms.”

¹³ National Weather Service; Wind Warnings, Watches, and Advisories; “NWS offices issue this product based on local criteria.”; <https://www.weather.gov/safety/wind-ww>; Downloaded 10/29/2020.

Recommendation:**Add**

Finding 10. The WSD shall solicit input from stakeholders and subsequently hold technical workshops prior to drafting proposals for the 2022 template changes in order to identify and address specific technical issues and questions that have arisen in the course of the Wildfire Mitigation Plan process.

By adopting this recommendation, the Commission would be addressing a longstanding source of inaccuracies and technical errors arising from inadequate stakeholder technical review. The WMP cycle needs to be a continuous improvement process, and with the current schedule structure there is no time allocated for significant process improvement or technical learning. The template review process is rushed, and has not time for technical analysis prior to issuance of a draft template. After the template is adopted, IOUs are under time pressure to prepare their WMPs. After issuance of the WMPs, WSD and all stakeholders are occupied by the process leading up to the approval of the WMPs. MGRA suggests that in the short window between final comment on the draft resolutions and the issuance of the draft template changes for the following year that WSD work with stakeholders to identify specific technical questions and issues that arose in the latest or previous WMP cycles for full review by stakeholders.

3. CONCLUSION

MGRA is pleased to have had the opportunity to contribute to the 2020 Wildfire Mitigation Plan process and the proposed changes that have been made to the 2021 process. Due to the scope of comments permitted on draft resolutions, we have not mentioned the areas in which the WSD has adopted proposals consistent with those suggested by MGRA. These areas are numerous and MGRA believes the process was inclusive and thoughtful, though hurried. MGRA strongly supports the adoption of the Draft Resolution and its Appendices and believes that its proposed changes would further strengthen the resolution.

Respectfully submitted this 2nd day of November, 2020,

By: /S/ ***Diane Conklin***

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