

**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-013**

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## **COMMENTS OF THE GREEN POWER INSTITUTE ON DRAFT RESOLUTION WSD-013**

Pursuant to the December 11, 2020, WSD Resolution conditionally approving the 2020 Bear Valley Electric Service Wildfire Mitigation Plan, 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-013*.

### **General Comments**

GPI generally supports WSD-013 for its thorough review of Bear valley Electric Service's (BVES) 2020 WMP refile, and the updated deficiencies that cover both past deficiencies with outstanding issues and new deficiencies based on the BVES WMP refile. GPI is optimistic that the updated WMP guidelines ratified in WSD-011, WSD's comprehensive 2020 WMP review process, and the substantial deficiencies identified in WSD-002 through WSD-006 and WSD-013 will lead to more comprehensive and complete WMP Updates and 3-year Plans in the future. In particular, the rigorous expectations established by the WSD in deficiency/condition format should lead to higher quality WMPs in the coming years. We also anticipate that these efforts will consolidate WMP plan details and reduce the disaggregation of content between reports, annual updates, and 3-year plans, and ideally eliminate the need for WMP refiles, like happened this year with BVES.

GPI supports the proposal in WSD-013 to defer all BVES refile deficiency/condition remediation updates to the 2021 WMP Update filing requirement. We support efforts to standardize and streamline WMP filings in general, in order to allow for a more thorough review process by intervenors, stakeholders, the public, the WSD, and the WSAB alike. The BVES WMP refile deficiencies are all classified as Class B and C and, while important, are less urgent than the Class A deficiencies found in the original 2020 WMP filings. We look forward to seeing how BVES addresses these updated deficiencies in their 2021 WMP Update filing.

We also support the language that is adopted in draft WSD-013 with respect to Deficiency BVES-R11 (Class C), “Lack of wildfire issues addressed in emergency preparedness plan,” which states: “Lack of ignition in the past does not mean the electrical corporation will not have wildfire events in the future, and the WSD is concerned that BVES is general unprepared to meet this challenge (Draft WSD-013 p. 49).” GPI remains concerned that a lack of or infrequent ignitions and near misses in smaller utility territories is creating a false sense of security for those utilities, and in the WMP review process. Predicting and mitigating stochastic utility-related near misses and ignition events is reliant on having and analyzing statically robust datasets. Small utilities do not have rich and robust data sets due to their limited territory size compared to larger IOUs. However, this does not imply that they are unlikely to experience a wildfire, including catastrophic wildfires. Rather they are probably at the same risk level as the IOUs, or even higher risk due to a lack of experience in managing wildfire risk, a lack of data needed to measure, anticipate, and mitigate risk, and a lack of experience in responding to fires. Recognizing that BVES, like other small SMJUs, has a substantial wildfire risk despite a lack of ignitions in the past is paramount to setting expectations for wildfire mitigation planning and preparedness. GPI recommends including the following statement as a guiding principle in WSD-013 that will set an expectation and precedence for the WMPs, BVES and the other SMJUs going forward:

Utility-related near misses and ignitions are stochastic events that require rich datasets in order to predict and mitigate their occurrence. Lack of ignitions in the past does not mean the electrical corporation will not have wildfire events in the future.

GPI is curious about the statement in WSD-013 that: “BVES reports a steady decrease in near miss incidents per circuit mile since 2016, with decreases reported across every cause category (Draft WSD-013, p. 10).” This is particularly curious since metrics such as asset inspection findings per circuit mile appeared to increase from 2015-2019, Red Flag Warning Circuit Mile Days per Year were variable but somewhat consistent, and reported 95<sup>th</sup> and 99<sup>th</sup> percentile wind events were two and three times higher in 2019, respectively, compared to the previous 4-year average. The fact that near misses decreased while risk-related drivers and factors increased is currently taken at face-value. These somewhat

contradictory data present an opportunity for BVES to gain insight into their wildfire risk causes, and institutional methods and effects. GPI recommends that WSD-013 require that BVES perform and provide an assessment of why near misses decreased from 2015-2019, including whether internal reporting standards, requirements, or methods for risk-monitoring changed over this timeframe, and/or if BVES implemented new operational methods and infrastructure that led to the decrease in near misses. BVES should include this assessment in their 2021 WMP Update.

We are also concerned regarding the general acceptance of BVES's Maturity Model self-scoring in WSD-013. WSD-013 states:

The electrical corporation's self-assessment is at the top level of maturity for seven of 10 capabilities in the categories of (I.) emergency planning and preparedness and (J.) stakeholder cooperation and community engagement.

Although difficult to reconcile against the reality of its very small territory and limited history of wildfires, such high assessments indicate BVES should be engaged in sharing its processes and methodologies with other SMJUs. Indeed, the electrical corporation sees some room for some growth in continuous improvement and collaboration on wildfire mitigation planning in these categories.

GPI agrees that it is difficult to reconcile BVES's high self-scores (e.g. Level 3 and 4) in many categories and capabilities, especially on account of the numerous outstanding and additional deficiencies found in BVES's 2020 WMP refile.

Deficiency BVES-R11, Class C in particular calls out BVES's: "Lack of wildfire issues address in emergency preparedness plan," and further states that "Lack of ignition in the past does not mean the electrical corporation will not have wildfire events in the future, and the WSD is concerned that BVES is generally unprepared to meet this challenge (Draft WD-013, p. 49)." This is concerning in and of itself. However, it also suggests that the current and 2023 Level 4 Maturity BVES's claims in the Wildfire Mitigation Maturity Survey for "Emergency planning and preparedness" are potentially inaccurate, and/or the self-scored Maturity Survey has little value in its ability to accurately summarize Utility capabilities. Other Categories also raise suspicions of accuracy such as

the Level 4 designation for Capability 51. “Collaboration with emergency response agencies,” which is currently in conflict with the need for deficiency BVES-R9: PSPS, Condition (vi) “[BVES shall detail] a detailed explanation of its coordination with the CPUC, CalFire, Cal OES, communications providers, representatives of people/ communities with access and functional needs, and other public safety partners to plan de-energization simulation exercises.” The lack of sufficient transparency in their WMP regarding methods and best-practices for multiple of the 10 core wildfire mitigation programs, including some with purported Level 3 and 4 maturity capabilities, also calls into question how BVES is achieving a Level 4 maturity in Capability 48: “Cooperation and best practice sharing with other utilities.”

Based on these discrepancies, GPI is concerned about the ability for Utility self-scoring, and the Maturity Model in general to provide an accurate summary of Utility wildfire mitigation and planning capabilities in the absence of WSD review, vetting, and non-utility scoring. Inaccurate maturity models and self-scoring results may provide a false sense of wildfire mitigation capabilities and preparedness to stakeholders, intervenors, and the WSD. While the value of the Maturity Model lies in its summarized and digestible format that allows for cross-utility comparisons, it can also present a readily consumed, misleading picture of utility wildfire risk mitigation to the public and ratepayers.

GPI recommends adding language to WSD-013 that notes outstanding discrepancies between BVES’s WMP narration and showings, and their Maturity Survey self-scores. Updated information in response to WSD-013 deficiencies may as yet prove that BVES’s maturity survey self-scoring is accurate. Until then, these results should include a “warning label” regarding the need to consider utility self-scoring only in conjunction with WMP content and WSD resolutions and the corrective actions stipulated therein. This will send a signal that utilities are expected to substantiate their Maturity Survey self-scores in their WMP filings, and will ideally improve method transparency and overall WMP quality. It will also provide documentation that the maturity model self-scores are not currently vetted and should be considered with caution.

Going forward, GPI understands that the WSD intends to vet Utility self-scores on the Maturity Survey. WSD-011 states

...The Utility Wildfire Mitigation Maturity Model is a method to assess utility wildfire risk reduction capabilities and examine the relative maturity of the wildfire mitigation programs. 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. 2).

GPI strongly supports verifying Utilities' Maturity Survey self-scores in order to present an accurate summary of wildfire mitigation and response capabilities across California and to the public. We look forward to WSD Maturity Survey audit and verification results for BVES and all utilities filing WMPs in the future.

### **Comments on Deficiencies / Conditions**

*Deficiency (BVES-R2, Class B): Details on risk spend efficiency and future modelling plans* – WSD-013 suggests deficits in BVES's plan timelines for both the 3-year and 10-year planning horizons:

BVES WMP Refile also lists each mitigation measure and a time period in which it will be completed in Supporting Table 5-1, but it did not provide a year-by-year timeline for reaching its 10-year goals (Draft WSD-013, p. 18).

And:

BVES states that it plans to develop a model to quantify ignition risk drivers and associated probabilities within the next 3 years but does not explain the steps it will take to develop this plan or how it intends to achieve this plan (Draft WSD-013, BVES-R2).

GPI recommends updating BVES-R2 Condition (vi) for clarity to specify a year-by-year timeline for reaching either 10-year or 3-year goals, or both. Suggested text additions are underlined and deletions are denoted with strikethrough:

vi) provide a year-by-year timeline for reaching ~~these~~ 10-year and 3-year goals.

*Deficiency (BVES-R7, Class C): Fuels management* – GPI strongly supports the condition that BVES:

- i) provide detailed information on its fuels management and slash reduction practices, and ii) disclose whether it intends on developing a fuels management program and/or joint roadmap in cooperation with the Forest Service and other land management agencies.

GPI continues to advocate for developing new and improved vegetation management (VM) residue and fuel load management programs. Mitigating slash and fuel load accumulation and establishing value-added pathways for these residues, such as biomass generation and higher-valued product end-uses, can improve program efficacy and sustainability while also reducing wildfire risk and consequence. Requiring utilities to report on their fuels and VM residue management programs in the WMP narration is particularly important since these activities are currently rolled into broad VM maturity model capabilities and can thus be easily overlooked or marginalized in the process of evaluating utility VM practice maturity.

BVES includes numerous activities in their responses to maturity model Capabilities 24 and 25 that suggest current and planned fuels management activities such as:

- “Utility removes vegetation waste along its right of way across the entire grid (WSD-013 Attachment C, Capability 24)”
- “Utility systematically removes vegetation outside of right of way (WSD-013 Attachment C, Capability 25)”
- “Utility removes vegetation waste outside [along] its right of way across the entire grid (WSD-013 Attachment C, Capability 25, [24])”
- “Utility removes vegetation outside [along] its right of way on the same day as cutting (WSD-013 Attachment C, Capability 25, [24])”
- “Utility works with local landowners to provide a cost-effective use for cutting vegetation (WSD-013 Attachment C, Capability 25 and 24)”
- “Utility works with partners to identify new cost effective uses for vegetation, taking into consideration environmental impacts and emissions of vegetation waste (WSD-013 Attachment C, Capability 25 and 24)”

If this is indeed the case, and their VM residue and fuel management programs are sufficiently progressive to substantiate a Level 3 Current and Level 3 and 4 Planned 2023 maturity ranking, then these practices and programs should be described in detail in order to substantiate the proposed self-score maturity levels and to serve as a model for other utilities.

We also support deficiency *BVES-R6, Class C: Vegetation Management Community Outreach* and the associated conditions. Notably, BVES indicates that “Community organizations are engaged in setting local clearances and protocols” and “Utility works with local landowners to provide a cost-effective use for cutting vegetation” in the Current and Planned state for Maturity Model Capacity 24: Vegetation Grow-in Mitigation. While a conglomerate of numerous activities, BVES self-scores their Vegetation Grow-in Mitigation efforts at Level 3, with plans to achieve Level 4 by 2023. Under Capacity 25: Vegetation Fall-in Mitigation, BVES concludes: “Vegetation is removed with cooperation from the community,” and: “Utility works with local landowners to provide a cost-effective use for cutting vegetation” in their Current 2020 and Planned 2023 state. Their Self-score for Capability 25 is currently at Level 1, with plans to achieve Level 3 by 2023. We reiterate that these high current and planned self-scores must be accompanied with transparency into BVES’s community engagement and vegetation residue uses in order to justify their scoring, and perhaps serve as a model for other utilities. At the proposed maturity levels, BVES’s community engagement and fuels management programs should be at a level that follows and even establishes best-practices.

## **Conclusions**

GPI generally supports WSD-013 and appreciates its thoroughness in requiring additional transparency into numerous BVES WMP plan aspects on topics such as fuels management, vegetation management community outreach, and emergency plan and preparedness. GPI recommends some adjustments to WSD-013 in order to: (i) establish guiding principles and set high wildfire risk management expectations for SMJUs with few to no recent ignition events, and (ii) to acknowledge the potential shortcomings of

utility self-scoring in the maturity survey and the expectation for utility WMP narrations and data to substantiate utility self-scores.

Dated December 31, 2020

Respectfully Submitted,

A handwritten signature in blue ink that reads "Gregory Morris". The signature is written in a cursive style and is positioned above a horizontal line.

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