



May 27, 2020

**Sent via email: [wildfiresafetydivision@cpuc.ca.org](mailto:wildfiresafetydivision@cpuc.ca.org)**

Wildfire Safety Division  
California Public Utilities Commission  
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**EBMUD Comments on WSD Draft Guidance Resolution WSD-002 and WSD Draft Resolution WSD-003 Ratifying Action on PG&Es 2020 Wildfire Mitigation Plan**

In accordance with the May 7, 2020 Letter to Stakeholders, East Bay Municipal Utility District (“EBMUD”) respectfully submits the following comments on Draft Guidance Resolution WSD-002 and Draft Resolution WSD-003 addressing the individual Wildfire Mitigation Plan (“WMP”) of Pacific Gas and Electric Company (“PG&E”). EBMUD appreciates the clarity and direction provided by the Wildfire Safety Division (“WSD”) in WSD-002 and WSD-003. We recommend two modifications below, and look forward to continuing our collective efforts to reduce and mitigate the impacts of wildfires and public safety power shut-off (“PSPS”) events.

**I. Require IOUs to provide details for WMP PSPS reduction initiatives on a circuit basis.**

In Section 6.5.6 of Resolution WSD-003, the WSD states that PG&E is deficient in not providing a level of detail sufficient to determine if PG&E can meet its goal of reducing the scope, frequency and duration of PSPS events (WSD-003, pp.51-52). The remedy for this deficiency is covered under Resolution WSD-002 as it applies to all of the investor-owned utilities (“IOUs”). The condition identified in Guidance-4 requires each IOU to provide detail on how each initiative will affect threshold values, and reduce frequency, scope and duration of PSPS events. (WSD-002, p.20; Appendix A, p.A-4, Guidance-4)

EBMUD welcomes PG&E’s goal of reducing the scope, frequency and duration of PSPS events, but agrees with WSD that more detail is needed on how this will be accomplished through initiatives such as vegetation management, system hardening and sectionalizing. Each IOU needs to provide enough detail to ensure that progress can be tracked effectively, and the WSD should require more precise locational information on where each initiative will be deployed. EBMUD specifically recommends that the IOUs provide the required detailed information on a circuit basis. As an example, information could be provided to state that system hardening activities on Circuit A will result in the removal of this circuit from potential PSPS events (or lower its threshold), resulting in a reduction of a certain number of circuit miles, customers and critical facilities from being impacted by a potential PSPS event. This

information should be provided as an Annex to the quarterly reports and updated on an ongoing basis.

A requirement to provide circuit level detail would also be consistent with the Guidance-8 condition addressing the “Prevalence of Equivocating Language – Failure of Commitment,” which calls for “measurable, quantifiable and verifiable” objectives, timelines and targets (WSD-002, p.24; Appendix A, p.A8, Guidance-8). Providing objectives described in circuit terms would help transform mere numerical targets into tangible ones that are measurable, quantifiable and verifiable and have geographical context. Circuit information is also meaningful to local governments and public safety partners as they can track progress on circuits that may affect their facilities.

## **II. Include water and wastewater service providers in the Condition addressing PG&E’s deficiencies in safety partner coordination.**

Although water and wastewater service providers are defined as public safety partners, they should be listed explicitly in items i) and iii) under Condition PG&E-27 (WSD-003, p.63):

- i) Provide an updated “coordination with public safety partners” plan that details precisely how PG&E works with cities, counties, incident management teams, ~~and~~ other first responders, and water and wastewater service providers.
- iii) Provide a list of every PG&E contact and their counterparts and the cities, counties, water and wastewater providers, and first responder entities and description of their interaction; ...

Coordination requirements need to be spelled out at this level of specificity in order to ensure that PG&E’s obligation to include water and wastewater service providers is explicit.

EBMUD appreciates your consideration of the above recommendations.

Sincerely,

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/s/

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cc: R.18-10-007 service list