

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

Wildfire Safety Division  
California Public Utility Commission

**COMMENTS OF THE GREEN POWER INSTITUTE ON THE  
WSAB DRAFT RECOMMENDATIONS ON THE 2022  
WILDFIRE MITIGATION PLAN GUIDELINES**

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WILDFIRE MITIGATION PLAN GUIDELINES**

Pursuant to instructions in the June 17, 2021, email to the service list, 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 the WSAB Draft Recommendations on the 2022 Wildfire Mitigation Plan Guidelines*.

GPI largely supports the WSAB draft recommendations that build on existing templates and will guide the 2022 WMP reporting period. We provide the following comments in response to selected sections.

**Section 1. Structure and Scope** – GPI agrees with the WSAB that the current WMP template results in a disconnect in crucial information for each wildfire or PSPS mitigation initiative. The scattering of mitigation-specific information results in redundant text required to introduce each mitigation and provide framing and context. We therefore support the proposed adjustments to the WMP template structure and scope to aggregate mitigation information according to:

- 1) Lessons learned, past deficiencies, notices of violations from other agencies; 2) Pilots, research proposals, and findings; 3) Goals, objectives, and program targets; 4) Performance metrics, underlying data, and data governance; 5) Risk modeling, prioritization, and risk spend efficiency; 6) Workforce planning for vegetation management and other limited resources; and 7) Detailed information on mitigation initiatives.

The WSAB provides a Vegetation Management (VM) specific example. GPI recommends updating the text to provide a generic reporting structure that will support direct usage in an updated WMP template:

- 1) Lessons learned, past deficiencies, notices of violations from other agencies; 2) Pilots, research proposals, and findings; 3) Goals, objectives, and program targets;

4) Performance metrics, underlying data, and data governance; 5) Risk modeling, prioritization, and risk spend efficiency; 6) Workforce and other limited resource planning for vegetation management and other limited resources; and 7) Detailed information on mitigation initiatives.

GPI also supports removing some of the WMP reporting requirements for ITOs. The filing ITOs have very limited jurisdictions and provide transmission infrastructure for quite special cases. If there are no changes to ITO jurisdictions with substantial undergrounded or submerged ITO transmission lines, or these lines are undergrounded to the extent that wildfire risk is near zero, it may be prudent to waive their annual WMP reporting requirement and instead only require a 1-year data reporting cycle and 3-year WMP filing cycle. GPI also recommends removing ITO presentations from the annual WMP workshops. While interesting presentations the ITO WMPs have yet to spark controversy or discussion regarding WMP developments and can therefore be limited to fewer reporting requirements.

We are however concerned with the proposal to remove requirements for SMJUs. It is not clear what reporting requirements the WSAB or SMJUs envision removing or reducing. SMJU territories have wildfire risk on par with larger utilities. The lower ignition and near miss reporting rates should not be taken as a signal of lower wildfire risk in these areas. It is also important to note that the SMJU's resource constraints are to some extent a liability, since they generally have less robust wildfire risk modeling capabilities, less predictor data, and lack preemptive asset replacement methods among other resource limitations. Based on the past two years of WMP filings it is clear that the SMJUs tend to file smaller reports in accordance with their smaller jurisdictions and resource constraints. However, reducing the amount and breadth of required information in SMJU WMP filings may lead to missed opportunities to guide efficient wildfire risk mitigation strategies, and may affect the ability to vet risk reduction strategies in these small, resource limited high wildfire risk territories. In general, based on our review of past WMP filings, there is no clear way to reduce SMJU filing requirements without losing access and transparency into critical wildfire mitigation efforts and models. GPI recommends that the WSAB provide

more specifics on which elements of the annual and 3-year WMP reports they think should be waived for the SMJUs.

We also agree with the WSAB recommendation to include more figures, tables, and examples (e.g. model application methods etc., PSPS decision process example for a set of conditions) in the WMP filings. Comments by Mr. Abrams in the WMP workshops called for the WMPs to include more customer-friendly and accessible content to facilitate communication and transparency with the public. Figures, tables, and examples would support stakeholder reviews as well as supporting and encouraging public review and understanding of the wildfire mitigation activities happening in their communities.

## **Section 2. Risk Assessment: Risk Modeling, GIS Mapping and Resource Allocation**

– GPI generally supports the WSAB recommendations for Risk assessment and data reporting. GPI requests additional clarification regarding what is meant by “high resolution” in regards to the WSAB vision for: “... high resolution spatial detail for all GIS data reporting so that the WSD can assess the impact of the mitigation efforts.”

GPI does generally support WSAB recommendation 3.5 with a suggestion to accelerate this portion of the WMP development process. Recommendation 3.5 states: “The WSD should continue to explore its options working with the utilities to develop a data access portal for interconnected data repositories and permission hierarchy.” Many data requests and substantial GIS and excel data sets, as well as unreported wildfire risk model outputs, are accruing and point to a growing need to develop a central data repository and data access portal. GPI recommends updating the language in WSAB recommendation 3.5 to be less equivocal and more of a call to action in the coming year.

We further recommend expounding on what the WSAB envisions in Section 2.7.e: “Detailed maps showing what mitigation measures will be completed in what areas (WSAB 2022 WMP guidelines, p. 9).” GPI strongly supports adding GIS data viewer capabilities to the data portal. The GIS datasets present a barrier to assessment since they require specific software capabilities. GPI recommends the WSAB include a GIS viewer element in the WMP data portal. The Integration Capacity Analysis (ICA) map tool developed in the Distributed Resources Plan Proceeding is a prime example of existing

GIS data viewer capabilities that the IOUs have, and may even serve as a template or framework for a WMP GIS data platform. The ICA map tool contains extensive data on distribution and transmission assets down to a node or line segment level and the IOUs are already required to add a PSPS event data layer. GPI strongly recommends either leveraging and building on the IOU's existing ICA map tool and rich granular dataset, or using the ICA tool as a template for developing a WMP GIS data viewer element within the data portal. Notably the ICA map tool already has registration and account access portal and legal access agreements in place to support and manage public access to sensitive information.

In general, GPI reiterates our past recommendation to hold an IOU risk model deep dive workshop to provide the WSD, WSAB, and stakeholders the opportunity to ask questions about model specifics and how the models are applied in mitigation prioritizations. Discussions from these workshops may help refine requirements for model reporting and access.

GPI agrees with the WSAB recommendations to require additional information on model methods, algorithms, inputs, outputs, assumptions, application and model vetting and uncertainty assessment, and to make risk models publicly available. GPI recommends the WSAB specify expectations for reporting statistical measures of model predictive power. We further recommend referencing the E3, third-party evaluation of PG&E's risk assessment model as a guide for expanding model-reporting requirements.

We generally support the WSAB proposal to establish and support peer review opportunities as part of the WMP review and development process. It may, however, be prudent to establish a formal third-party vetting and review process for granular wildfire risk models to ensure timely and somewhat standardized assessments that focus on implementing functional risk models for near-term use. Peer review opportunities in contrast may produce more open-ended review formats that support major and novel developments as well as inform near-term refinements.

WSAB recommendations 2.2 and 2.3 are very similar and should be combined or clarified and distinguished.

**Section 3. PSPS: Reducing scale, scope, and frequency** – GPI supports the WSAB recommendation to require the inclusion of PSPS as a risk in the RSE valuation method. This sends the right signal, will favor mitigations that can reduce PSPS events, and will require utilities to quantify PSPS risk reduction for each mitigation. While there has been talk of changing PSPS thresholds based on CC capabilities and perhaps EVM this has yet to manifest in actual implementable protocols and PSPS-reduction benefits despite extensive CC installations and EVM work. A requirement to include PSPS risk-reduction benefits in the RSE may help to accelerate the correlation between and implementation of mitigation activities and PSPS reduction.

GPI also supports the development of risk-tolerance metrics. Examples of this from other Utility requirements includes measurable and forecastable system reliability metrics, such as the Loss of Load Expectation (LOLE) metric which is currently established at 0.1, and roughly equates to a maximum of 1 outage event every 10 years. Similar decadal metrics may be appropriate for establishing wildfire risk tolerances and mitigation targets and could be updated regularly to reflect advances in wildfire mitigation, climate change, and the maturation of best practices and reasonable achievable standards.

**Section 4: Vegetation management: Strategies and Environmental Stewardship** –

GPI supports the recommendations on tree replacement efforts, ecosystem health and management responsibilities, advancements in data collection, and additional requirements for herbicide and growth inhibitor use.

GPI is appreciative of the WSAB mention of risk associated with “failing to remove slash and cut trees, and thereby causing a greater fire hazard,” and the recommendation that:

The WSD could provide recommendations to the CPUC on how to reduce the greenhouse gas impact of wildfire mitigation activities such as replacing the carbon capture capacity that is lost when vegetation is removed and converting slash into biofuel (WSAB 2022 Guidelines, p. 26).

We support these views and further suggest that the WSAB add a specific recommendation that addresses efficient end-uses for slash residues as part of the effort to reduce greenhouse gasses and other environmental impacts such as increased wildfire risk and landfill overflow. This will support more comprehensive and sustainable VM

approaches that include tree replacement as well as slash end-use pathways. At the very least, better post-VM residue treatment cleanup requirements are very much in order.

Section 5. System Design and Operation – GPI is generally supportive of the WSAB recommendations herein. We suggest expanding on the WSAB recommendation regarding increasing the scope of pilot programs to gather data more quickly. Based on past ignition and outage events utilities should be able to forecast how long it will take to gather sufficient data to answer key risk-reduction questions. Utilities should be required to provide a pilot timeline that includes the number of years anticipated to collect sufficient data to determine pilot efficacy, RSE, and overall value. GPI also recommends inquiring if field-scale test sites and studies may be appropriate for pilot programs that would otherwise take years to vet.

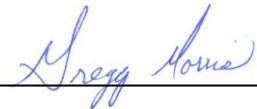
**Section 8. Expertise to support wildfire safety** – GPI agrees that additional expertise is needed to evaluate and help develop the WMPs and major elements therein such as granular risk modeling and preemptive climate change considerations. The WSAB recommends that this expertise should be developed within the WSD. We suggest that soliciting external expertise and consulting contracts may in some cases help fill knowledge gaps. The E3 report on PG&E’s risk model is a good example.

## **Conclusions**

The GPI urges the Commission to adopt our analyses and recommendations.

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Respectfully Submitted,



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