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 WMP GUIDELINES, PERFORMANCE METRICS, AND SAFETY CULTURE

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Pursuant to WSD-001, 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 WMP Guidelines, Performance metrics, and Safety Culture. These comments are in response to the Draft document from the Wildfire Safety Advisory Board.

Opening Comments

The WSAB 2020 Recommendations call for major overhauls to the WMP process including revising the WMP report structure, changing data reporting standards, and suggesting the need for wildfire risk assessment and mitigation at a circuit level of granularity. GPI supports the WSAB recommendations overall, and looks forward to the discussion and novel developments they will undoubtedly spark. We provide comments and recommendations on structural changes to the WMPs, data access and availability, granularity of wildfire mitigation initiatives, scientific evaluation of the WMPs, vegetation management backed by science, Prudent Operator Threshold, Black Swan Events, post-accident debriefing, and WMP revision under CPUC jurisdiction.

One of our biggest concerns lies in the data reporting and access discrepancies between Recommendations 1.4 and 2.4, 3.1 and 3.2. GPI believes transparency is foundational to the WMP process, and is best achieved by making the maximum amount of data available for public and stakeholder review. To this end, GPI believes that Recommendation 1.4 is shortsighted where it states that "The Board recommends the 2021 WMP Guidelines require simplified and streamlined reporting requirements to include the data that are critical for WSD staff to complete its evaluation (WSAB 2020 Recommendations, p. 18)." Recommendation 1.4 should be revised to better reflect that stakeholders other than the WSD are valuable resources for reviewing the WMPs and that providing them with access to a wide range of data types can support the WSD's assessment of the WMPs. These

data types may include data other than what the WSD deems "critical" to reviewing the WMPs and the CPUC/WSD should therefore not reduce the data reporting requirements. Additional discussion is provided below.

The GPI also supports retaining the WSD and WMP review process under CPUC jurisdiction where parallel proceedings, CPUC-determined data confidentially rules, and robust stakeholder networks are already in place to ensure the WMPs have the best chance to meld ongoing wildfire mitigation and grid improvement strategies into a cohesive path towards a more diverse and robust electric system that delivers reliable electric services with low wildfire risk at reasonable costs. Members of the CNRA should instead be invited to contribute to the WMP review process while it remains under CPUC jurisdiction.

WSAB 2020 Recommendation Specific Comments

Structural Recommendations – The GPI generally supports the WSABs recommendations for structural changes to the WMPs with some modifications. We also noted in the process of reviewing the 2020 WMPs that there were redundancies in the content provided, particularly in Section 5.1 Wildfire Mitigation strategy, Section 5.2 Wildfire Management Plan implementation, and Section 5.3 Detailed Wildfire Mitigation programs. The format required significant cross-referencing within each WMP. In alignment with WSAB Recommendation 1.1 (WSAB 2020 Recommendations, p. 13-14), GPI believes it is worthwhile to consider at a minimum restructuring WMP Section 5 around each of the ten program categories as well as include the maturity scores in each category so that reviewers can more easily evaluate how the utilities self-scored and fall within the maturity matrix.

We do not agree that "Stakeholder cooperation and community engagement should be the first mitigation program category discussed because of the importance of the issue to the public (WSAB 2020 Recommendations, p. 13)." We do not perceive the WMP initiatives as ordered according to their importance, but rather in terms of the general flow of information needed to assess subsequent programs. We do believe that community and

stakeholder engagement is a very important aspect of the WMP. "Risk assessment and mapping" is, however, foundational to understanding what and where wildfire risk mitigation must occur, and should therefore preceded all other Wildfire Mitigation Programs in order of description so as to prepare the reader to evaluate the other nine risk mitigation programs based on the Utility's baseline wildfire risk knowledge. Furthermore, the type and location of stakeholder cooperation and community engagement is informed in large part by risk assessment activities and the implementation of WMP programs. GPI believes that placing Stakeholder Cooperation and Community Engagement at the end of the ten program categories is not a reflection of its importance, but rather provides the reader with the background necessary to assess the scope of stakeholder cooperation and community engagement needed given the preceding WMP programs and initiatives.

Data availability – GPI believes that the WSD should strive to achieve and maintain the highest levels of transparency in the WMP process and for CA Utility wildfire risk in general by maximizing data availability and access for stakeholders including WMP parties, customers, scientists, and utilities alike. The WMPs present an opportunity for a wide range of stakeholders such as scientists (e.g. fire, climate, meteorology), utilities, engineers, innovators, and customers, to collectively assess wildfire risks, mitigation approaches, and the impacts of those risks and programs on communities and individual customers. While the WSD and the WSAB consist of experts from diverse backgrounds across the potential stakeholder categories, additional input from outside parties to the WMP will expand the intellectual capital available for developing cost effective and robust solutions to Utility wildfire risk. These resources can only be leveraged to their fullest extent by ensuring data are made available to the public through easy to access and navigate platforms. GPI therefore generally supports Recommendations 2.4, 3.1 and 3.2, which include standardizing data, assembling a scientific review board, and developing a data access portal, respectively. We do not, however, support WSAB recommendation 1.4 in terms of its advisement to reduce data reporting, which will in turn reduce WMP transparency and hinder outside assessments by stakeholders.

GPI is concerned about language used in Recommendation 1.4 which states:

> The Board recommends the 2021 WMP Guidelines require simplified and streamlined reporting requirements to include the data that are critical for WSD staff to complete its evaluation.… There will likely be better outcomes and more collaboration between CPUC and utility staff if the CPUC could demonstrate that the data submitted by the utilities is in fact used in the decision-making process. Regulators often request large amounts of data to monitor utility programs and there should be a demonstration that data collected and submitted are used and analyzed (WSAB 2020 Recommendations, p. 18).

The data compiled and provided in the WMP serves as the primary repository supporting transparency related to wildfire safety, barring direct data requests from the Utilities. Until and unless a central data repository that supports public access to non-confidential data is developed as per WSAB Recommendation 3.2, the WMPs should continue to serve as a repository for wildfire related data, and those data should not be limited to data types that are perceived to be "critical for WSD staff to complete its evaluation." The WSAB 2020 Recommendations provide no guidance as to the data they believe are "critical" to evaluating the WMPs. We interpret this as an attempt to simply reduce the reporting burden on the Utilities without fully understanding the value of the data requested or its potential to inform wildfire mitigation activities. It is far too early in the MWP development process to eliminate data from the WMPs.

Suggesting that some of the currently required data reporting is unnecessary is shortsighted. In the scientific process one cannot always know whether a particular data type will provide valuable information, and which data is "unnecessary" to collect, until the data have been collected and analyzed. It is also not unusual to collect more data and samples than one might anticipate needing, because inevitably a researcher may have missed an unforeseen aspect of the experimental design process that additional samples or data may be able to explain, or expand the ability to understand, the system in question. Even data that do not show a trend does not necessarily imply that the data are inconsequential. The lack of a signal or trend is, in itself, information, and could show, for example, that a particular aspect of a system is not currently a concern. Alternatively lack of a clear trend may reveal that there are simply insufficient data or evidence to interpret the trend, such as the ignition data provided by many of the SMJUs. Retaining

these data types for review by WMP parties and scientists can help improve data collection methodologies that will ultimately advance the wildfire mitigation effort.

We also caution that a data type deemed inconsequential or unnecessary based on the viewpoint of one expert may be seen as extremely insightful and valuable to another expert in a different field with a disparate perspective on wildfire risk mitigation. To this end the WSD is not the only stakeholder group interested in WMP and wildfire related data. Many parties engaged in the WMP development and review process may extract value from otherwise overlooked data that can contribute to insight into wildfire mitigation approaches and expand the WSD's understanding of and ability to assess the data. Indeed, this is the intention of hosting open proceedings and supporting party engagement. Reducing transparency by reducing data reporting, and therefore data availability, in the WMP will hinder outside assessment by both WMP parties and a future scientific advisory board. This could lead to missed insights into the efficacy of the WMPs. Reducing WMP data reporting requirements may also lead to more individual data requests, which could in turn result in more disjunction between Utility datasets (e.g. type, format) and counteract the intention of WSAB Recommendation 2.4 to move towards more standardized data.

WSAB Recommendation 2.4 states:

> The Board recommends the CPUC consider WSD's recommendation for a data taxonomy and data schema that will ensure consistent formatting and streamline the reporting of data, using the same measurements. The Board recommends WSD hold data working groups that are open to any interested parties to contribute to the generation of data standards for utility reporting as well as to assist in leveraging existing data standards from other fields (WSAB 2020 Recommendations, p. 6).

Recommendation 2.4 is contrary to Recommendation 1.4, which advises decreasing Utility data reporting in the WMPs at the discretion of the WSD. Whereas Recommendation 2.4 advocates for evaluating WMP data reporting standards through collaborative working groups hosted by the WSD in conjunction with interested parties. GPI supports Recommendation 2.4 on data standardization so long as it does not include removing data or reducing data reporting requirements as suggested in Recommendation

1.4. Enabling cross utility comparisons through standardized data (e.g. types, formats, and definitions) is important for moving towards defining best practices in wildfire mitigation approaches. While we recognize that there may be differences in best practices based on a range of factors, such as ecosystem, regional climate, and grid topology, cross-utility learning and assessment will help to streamline the wildfire mitigation approach by leveraging lessons learned across California. We also agree that the WSD should leverage the expertise of interested stakeholders in the process of developing and advancing data reporting within the WMPs so as to support a wide range of analyses that reflect the broad spectrum of paradigms relevant to WMP development. Given the contrary advice in WSAB Recommendations 1.4 and 2.4 in regards to WMP data reporting, we recommend the WSAB clarify their position in the 2020 Recommendations by either striking the first clause in Recommendation 1.4 from the final document, or revising it to better align with Recommendation 2.4.

GPI also supports 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), which includes:

> The Board recommends the CPUC, with oversight by the WSD, require the utilities to contribute to a data repository where data sources can be accessed by interested parties through a portal with varying levels of data access. To ensure data security, WSD would develop data policies defining a hierarchy so that different granularities of data can be accessed by interested parties with certain levels of permissions types (e.g. CPUC staff, scientists, those with Non-Disclosure Agreements (NDA), the public). [And]
>
> The Board recommends the WSD develop data policies through a transparent stakeholder process, taking into consideration the needs of regulators and the scientific community, as well as the security of utility infrastructure. (WSAB 2020 Recommendations, p. 7)

Notably, Recommendation 3.2 aligns and even overlaps with Recommendation 2.4 but conflicts with Recommendation 1.4 in its support for facilitating data access and MWP transparency via a data portal, and advocating for stakeholder engagement in developing data policies. We again urge the WSAB to eliminate or revise Recommendation 1.4 to better align with Recommendations 2.4 and 3.2 in order to provide clear direction for data reporting and development in the WMP. GPI also strongly supports developing a central data repository for all WMP relevant data, including standard data reporting requirements as well as individual data requests, with data access commensurate with CPUC established

> confidentiality stipulations. A platform of this type can facilitate stakeholder access and review including for academics, WMP parties, utilities, and customers.

Granularity of wildfire *mitigation initiatives* – There are numerous references to wildfire risk assessment and mitigation at the circuit section and/or circuit level, including:

> …require utilities to complete a Risk Spend Efficiency (RSE) analysis for each mitigation measure so that each measure can be considered individually, in aggregate, and against each other, to determine the most appropriate wildfire mitigation effort for each circuit section (WSAB 2020 recommendations, p. 19).

> Whether the guidelines should require the use of a "Prudent Operator" standard to establish the risk reduction that a prudent operator would assume given specific mitigation measures and circuit topography (WSAB 2020 recommendations, p. 35).

> …What portfolio of wildfire mitigation techniques can reduce the risk of ignition so that the utility is confident to continue serving customers at high wind events of 30, 40, 50, or 60 MPH, or whatever the appropriate threshold is, without having to deenergize. Each circuit requires risk reduction based on an analysis of the risks presented at each location (WSAB 2020 recommendations, p. 36).

> The Grid Hardening Operating Criteria provides the utilities with a roadmap to evaluate each circuit within a distribution or transmission line with the goal of reducing PSPS events for certain circuits. This Grid Hardening Operating Criteria should be developed alongside the Prudent Operator standard and could be referred to as the "Prudent Operator Grid Hardening Criteria." (WSAB 2020 Recommendations, p. 36)

> Risk reduction in targeted circuit sections and the exclusion of these targeted circuit sections from some PSPS events in the future… (WSAB 2020 Recommendations, p. 37)

The Utilities generally appear to perform risk mitigation activities at the granularity of HFTD/WUI. Some risk assessment approaches may include analyses at higher granularity, such as localized match drop simulations and individual at-risk tree identification. In another example SDG&E states plans to achieve "[h]igher granularity in prioritizing initiatives across the grid (SDG&E 2020 WMP, p. 15)" by 2030. The WMP has not established strict guidelines regarding the granularity required for wildfire risk assessments or prioritizing and implementing mitigation activities. There is a precedence for modeling the distribution system at a high granularity in the DRP proceeding, consistent with circuit and/or node level analyses. The next WMP cycle should evaluate

the value of circuit level granularity as implied by the WSAB recommendations. The WSAB should clarify its position regarding the necessity of circuit level granularity of RSEs and other WMP components, including whether it believes granularity should be a topic of discussion in regards to RSEs and other updates to the WMP guidelines, such as the 10 WMP initiatives therein. The GPI suggests that assessing the need for circuit level evaluations should constitute a separate WSAB recommendation that includes weighing which aspects of the MWP, if any, should be conducted at a circuit level granularity, and whether circuit-level analyses should be constrained to HFTD and WUIs or apply Utility-wide. Initiative and RSE granularity should be addressed early on in the WMP development process since analyses at the circuit, line, or node level are resource intensive and take time to implement.

Scientific Evaluation of the WMPs – GPI supports Recommendation 3.1 (Scientific Review of Modeling Methods and Assumptions). There is a precedence in CPUC proceedings, such as the Distribution Resources Plan (DRP), to solicit an external review of Utility proposed methodologies from an Independent Professional Engineer (IPE). Evaluating the WMP and Utilities' approaches to modeling wildfire risk, implementing risk mitigation initiatives, and the efficacy of those initiatives is no different. Establishing a scientific advisory board and review panel aligns with the scientific process and will increase confidence in the approved WMP initiatives. GPI also recommends expanding the scientific panel to include a risk management expert that can evaluate the Utilities' thoroughness in assessing wildfire risk, and the strategic implementation of initiatives to address that risk.

Parties to the WMP can also facilitate in evaluating the MWPs from a scientific perspective. However, science-based reviews of the MWPs can only be achieved by maximizing data accessibility. Data should therefore be made available and easily accessible to afford parties to the WMP the opportunity to support the WSD assessment. A more detailed discussion regarding Data accessibility and related recommendations is provided above.

GPI also supports Recommendation 3.3 regarding "Reporting Expert Qualification and Scientific Justification for Decision Making" which states:

> The Board recommends that the 2021 WMP Guidelines require the utilities to disclose the qualifications of scientific personnel relied upon to prepare the WMPs in order to increase transparency and demonstrate that each utility is relying upon accurate expert advice. Perhaps the minimum hiring qualifications for these roles ought to be developed.
>
> Wherever the best available science is relied upon within the WMPs, the Board recommends the 2021 WMP Guidelines direct the utilities to include a citation to the peer-reviewed scientific literature and associated scientific works. Citations ensure that the public can identify the scientific authorities relied upon by the utility as well as help socialize groundbreaking scientific efforts (WSAB 2020 Recommendations, p. 7).

GPI is concerned with the over-abundance of references to Subject Matter Expert (SME)-based decision making in the opening WMP workshops (February 18-19 and 24-25, 2020) and the WMPs, in particular SDG&E's WMP. GPI recommends that "SME's" in general should be included in Recommendation 3.3 in addition to "scientific personnel". While we agree that SMEs should contribute to initiative selection and implementation, "SME's" should, as in every other profession, be able to confirm their expertise based on their education or other experiences. An individual's perspective should also be backed by a combination of peer-reviewed literature, data, and second opinions. Even so, work completed by SMEs in the academic system and submitted for publication and acceptance by the academic community is subject to peer-review prior to publication. We agree that the WMPs should follow this model and warrant disclosure of SMEs credentials as well as be subject to peer-review by a scientific advisory board. However, we also advise that the WSAB recommendation should go one step further and include compiling Utility SME recommendations and decisions in formal document format, including living documents, in order to track and formalize the decision-making and recommendation process for others within the Utility and between Utilities. This will facilitate the review process and will promote the development of best practices through cross-utility exchange.

Vegetation Management backed by science – We are pleased to see WSAB Recommendation 3.4 support a scientific review of all Utility Vegetation Management (VM) practices. The wide range of VM approaches, including tree trimming distances

and designation of at-risk "species", warrants independent review and guidance in order to help identify and narrow down best practices capable of cost-effective wildfire risk mitigation. We also agree that all Utilities should more clearly define and narrow their definition of "at-risk species" in order to better hone VM tree trimming and removal efforts on trees that pose the most wildfire mitigation risk. This may reduce the number of tree removals, making VM tree work more resource, time, and cost effective for all Utilities.

The mention of fuel load and, "…how the utilities assesses the tradeoffs between vegetation fuel load versus flammability (WSAB 2020 Recommendations, p. 7-8)" in Recommendation 3.4 is encouraging. The current focus on tree trimming around powerlines is only one source of wildfire risk associated with vegetation. There are insufficient considerations for how vegetation other than trees should be managed, and the role of fuel load and management in wildfire risk and consequence beyond tree trimming and removal. The connections between Utility match-drop risk modeling, vegetation moisture levels and fuel load should be better established and more fully considered within each Utilities' VM initiative. The GPI strongly encourages a more comprehensive assessment of fuels management within the VM programs. This aligns with Recommendation 3.4 which states "Utilities should justify the removal of species, particularly shrubs, that will not reach a height to touch or contact electrical lines (WSAB 2020 Recommendations, p. 8)." As stated, however, Recommendation 3.4 appears to challenge the removal or treatment of fuels and fuel load other than trees. GPI advises rephrasing Recommendation 3.4 to guide the WMP and utilities towards performing a more comprehensive VM assessment that considers fuel type, load, and flammability, along with match drop consequence models, and leads to holistic vegetation management strategies that go beyond tree trimming and removal. Aspects of the fuel load issue are more clearly addressed in the Observation and potential data sections of Recommendation 3.4 which advise:

> Certain traits make a plant more flammable than others, one of those is surface area to volume ratio. Utilities should develop a justification for their vegetation management practices that explain which flammability characteristics they are utilizing to develop the

> vegetation management practices. Scientists should review these plans and provide input (WSAB 2020 Recommendations, p. 32).

and

> There must be a more detailed description of utility understanding about the tradeoffs between vegetation fuel load (related to fire intensity) versus flammability, the two most important components relative to fire behavior (WSAB 2020 Recommendations, p. 33). These statements should be moved to the recommendation section 3.4 on Aligning Vegetation Management Practices with Best Available Science.

Fuel load and flammability may also be linked to the treatment of VM residues, particularly those left in place after trimming or tree removal. These biomass residues could contribute to increased fuel load around and under conductors, and increase the fuels load in already high risk HFTDs. The GPI strongly recommends that Utilities should be responsible for biomass residue management plans in the VM programs that include value-added biomass use pathways such as biomass power generation, and higher-valued product production.

Prudent Operator Threshold – GPI looks forward to more discussion surrounding a prudent operator standard. However, the WSAB suggests the adoption of this "in addition or as an alternative to the Performance Metrics." The GPI discourages replacing performance metrics with operator thresholds such as grid hardening standards, particularly at this early stage. The MWP and the methodologies selected, tested, and employed therein to decrease wildfire risk should not be constrained to a static target, but rather function as an ongoing learning process with continuous adjustments towards achieving the maximum wildfire risk reduction in the most cost-effective way. Just as climate and associated weather patterns are anticipated to shift, so should wildfire mitigation strategies to meet those shifting conditions. While lessons learned may lead to best practices, which in turn become Prudent Operator Thresholds, they should not eliminate the opportunity for improvements and innovation via performance metrics that assess the efficacy of each initiative over time and under a changing climate.

Black Swan Events – We support ongoing reviews and updates to the risk bowtie analysis that include an assessment of black swan events as per Recommendation 5.1. While we

support Recommendation 5.1 to expand and advance an understanding of rare and potentially high impact wildfire risk sources and occurrences, we hope this will not deter from developing a better understanding of and refined approach to addressing major ignition and wildfire risks such as those identified in the 2020 WMPs. In general, the Utilities should more clearly describe how their risk bowtie and other wildfire risk assessment methodologies and tools used in the WMPs are updated and whether they are capable of identifying and assessing Black Swan Events. The WSAB should call for a more clearly articulated risk assessment method, including clarifying how it will work to identify both common and rare risks (e.g. Black Swan Events) and how the results of the risk assessment are used to inform the WMP initiatives.

Post-accident Debriefing and Learning – We support Recommendation 5.4 to assess the effectiveness of the post-accident evaluation process. Notably this aligns with Recommendation 5.1 to assess black swan events and may benefit from cross referencing or combining these recommendations. Recommendation 5.4 also connects to the WSAB recommendation to include a lessons learned section in the WMPs. GPI suggests that the WSAB 2020 Recommendations explicitly connect and/or cross-reference all Recommendations that involve developing and including "Lessons Learned" in the WMP. This will facilitate the development of a more robust and well-rounded WMP development cycle based on lessons learned from incidents, initiative implementation and performance/outcome metrics alike.

Wildfire Safety Division Should Remain at the CPUC – GPI supports recommendation 6.1 to "continue performing the important wildfire safety work at the CPUC instead of spending time, energy, and money moving to a different agency in July 2021 (WSAB 2020 Recommendations, p. 44)." The WMPs are complex and multi-faceted plans that require technical reviews relating, but not limited, to electrical grid topology and hardware, vegetation management, fire sciences, and customer outreach. Due to the many facets of utility wildfire mitigation, we understand it is difficult to determine whose jurisdiction the WMP evaluations should fall under. The CPUC/WSD has already developed a stakeholder network and WMP review process via CPUC supported

programs. This stakeholder network brings a wide range of perspectives to the WMP assessment process from parties such as customer advocacy groups (e.g. TURN and PAO), to scientists, developers, and community representatives. These wide-ranging perspectives enhance the ability of the WSD to evaluate the WMPs and their capacity to cost-effectively mitigate wildfires while also addressing customer needs. If the WSD is moved to the CNRA and converted to the OEIS, the existing stakeholder network committed to reviewing and improving the Utilities' approach to wildfire mitigation would be dissolved and at a minimum would need to be rebuilt.

We also highlight the fact that many ongoing proceedings in the CPUC, including the WMP, PSPS, Microgrid, DRP, RAMP and S-MAP, overlap with initiatives in the WMPs such that decision making in and/or coordination with these other CPUC proceedings could have profound impacts on the WMPs. Collectively these proceedings, along with the WMPs, should result in constructive and complimentary outcomes that move utilities in a unified direction towards more diverse and robust electric systems that deliver reliable electric services with low wildfire risk at reasonable costs. Reviewing the WMPs under the jurisdiction of the CPUC, where the majority of other related proceedings are taking place will provide the best opportunity to coordinate proceedings. Moving the WMP review process from the CPUC to the CNRA may hinder the ability to coordinate proceedings. This includes whether parties to other related CPUC proceedings will have the opportunity to comment on the WMPs if they are moved to the CNRA.

Data reporting within the WMPs, including individual data requests, are subject to CPUC established confidentiality rules. As WMP data reporting continues to develop and questions arise regarding WMP initiative and risk assessment granularity, new WMP data requests may be subject to CPUC confidentiality rules that would require CPUC input and associated Rulings or Decisions. For example, "Development of a Data Access Portal for Interconnected Data Repositories and a Hierarchy of Permission to Access Wildfire Data and Modeling Methods" proposed in Recommendation 3.2 will likely lead to questions regarding data redaction, confidentiality, access via NDAs, and other proprietary data considerations. Since this includes IOU data and regulation, WMP data access and

confidentiality standards are most likely under the jurisdiction of the CPUC. For these and other reasons described above, moving the WMP to the CNRA will not likely result in a clean break. Rather the WMP review and concomitant development process will require ongoing CPUC engagement and decision-making for aspects such as data confidentiality, but without the benefit of the CPUC's stakeholder network.

Reviewing the Utilities' WMPs is not a siloed process that stands alone from the revision of WMP guidelines that are taking place in the CPUC's WMP proceeding. That is, WMP development is an ongoing iterative process that takes lessons learned from the current WMP submission and review cycle and feeds them back into WMP Guideline development via the WMP proceedings. The iterative review and revision process is intended to improve the WMPs and their ability to hold utilities accountable for cost-effective wildfire mitigation while providing high quality, reliable electrical service. Bifurcating the iterative WMP review and revision process between the CNRA and the CPUC may hinder the development process.

As we understand it, relocating the WSD to the CNRA would primarily function to move the WMP review and approval board outside of the CPUC; yet all of the rulemaking decisions, including adjustments to the WMP Guidelines via the WMP proceedings, holding the Utilities accountable for any WMP related requirements, and data confidentiality rules, would still fall to the CPUC. Instead of moving the existing WSD from under CPUC jurisdiction, GPI advises that the CPUC extend an invitation to key members of the CNRA to serve on the WSD, WSAB, proposed scientific advisory board, and/or as parties to the WMP review process. This would provide members of the CNRA the opportunity to review the WMPs as planned, and contribute their expertise and recommendations regarding WMP development without relocating the WSD and dissolving the existing WMP stakeholder network. To this end the WSAB could expand Recommendation 6.1 to advise that relevant members of the CNRA can be brought into the current WMP evaluation structure instead of dissolving and reconstructing the existing WSD review board and stakeholder network.

Conclusions

The GPI appreciates the perspectives of the WSAB on the 2020 WMPs and largely agrees with their recommendations. However, WSAB recommendation 1.4 raises some questions about data reporting and access that are concerning for establishing and maintaining WMP transparency and open data access. GPI supports maximizing transparency by maximizing access to data on WMP initiatives and Utility wildfire risk.

The issue of WMP initiative, RSE and risk assessment granularity (e.g. the circuit level) is also peripherally touched on in the recommendations but is not directly addressed. Increasing the granularity of risk assessment, and program or initiative implementation requires tools and databases that support high resolution tracking and mapping systems. While beneficial, these higher-granularity systems can be time and resource intensive. For this reason, discussion focused on assessing WMP initiative granularity should start as soon as possible in order to guide the Utilities and their respective WMPs towards higher granularity where it counts most.

The GPI also believes that the WSD and WMP review process should remain in the CPUC where parallel proceedings, CPUC-determined data confidentially rules, and robust stakeholder networks are already in place to ensure the WMPs have the best chance to meld ongoing wildfire mitigation and grid improvement strategies into a cohesive path towards a more diverse and robust electric system that delivers reliable electric services with low wildfire risk at reasonable costs. To this end members of the CNRA should be invited to contribute to the WMP review process while it remains under CPUC jurisdiction.

We recommend that the Commission adopt the positions that we have taken in these comments.

Dated June 15, 2020

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