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PG&E’s Comments on the Wildfire Safety Advisory Board’s Draft Recommendations on the 2022 Utility Wildfire Mitigation Plan Guidelines, Performance Metrics, and Safety Culture Assessment

INTRODUCTION

Pacific Gas and Electric Company (PG&E) appreciates the engagement of the Wildfire Safety Advisory Board (Board) in providing its feedback and draft recommendations in the Board’s *2022 Wildfire Mitigation Plans Guidelines, Performance Metrics, and Safety Culture* (Draft Guideline Recommendations). The Draft Guideline Recommendations include 40 recommendations, many of which suggest that the utilities provide additional data, plans, or details in their respective 2022 Wildfire Mitigation Plans (WMP).

We fully support the Board’s overall intent to continue to improve the WMP process and submissions. Since the first WMPs were submitted in 2019, there has been substantial improvement due in large part to the efforts of the Wildfire Safety Division (WSD) to develop a uniform WMP outline, as well as uniform tables and reporting requirements. We appreciate the Board’s recognition that the utilities’ WMPs have become “more accessible and transparent to the reviewer as a result of this iterative process.”¹

While we support continued WMP improvements, it is important to note that substantive and material changes to the WMP require adequate lead time for the utilities to understand the requirements, including the templates or expected format, and to gather the information in advance of the WMP submission date. Ensuring adequate time from when the 2022 WMP templates and requirements are finalized to the WMP submission date will best enable utilities to provide the most complete and consistent data possible. This will also allow for the most efficient and effective review of those plans during the post-submission review period. We appreciate the Board developing the Draft Guideline Recommendations early in the 2022 WMP process so that the Board’s recommendations can be finalized, provided to WSD, and hopefully incorporated as appropriate into the final 2022 WMP guidelines.

We also recognize that the Board has a relatively short time in which to consider these comments on the Draft Guideline Recommendations and make any changes to these recommendations before they are reviewed at the Board’s June 28th meeting. Given this short review time, we are focusing our comments on critical issues that we believe require revision

¹ Draft Guideline Recommendations, p. 4.

to some of the recommendations in the Draft Guideline Recommendations. The table below provides a summary of our specific suggestions for revisions to or deletions of certain recommendations:

Section and Recommendation	Subject	PG&E Recommendation
Section 3, Recommendation 1	Risk Spend Efficiencies (RSE) for mitigations	Revise to state that an RSE is not required for every mitigation
Section 3, Recommendation 1	RSEs for mitigations	Revise to state that RSEs at a circuit level are not required until the 2023 WMP
Section 4, Recommendation 1	Tree re-planting	Delete recommendation
Section 4, Recommendation 2	Healthy trees and requirement of environmental review by independent ecologist	Delete recommendation
Section 4, Recommendation 6	Planting low-growing shrubs in utility defensible space	Delete recommendation or revise to indicate that the utilities should describe their recommended approaches for utility defensible space rather than prescribing one particular method.
Section 4, Recommendation 7	Reporting on herbicides and pesticides	Delete recommendation
Section 5, Recommendation 6	Idle lines	Clarify this that recommendation applies to idle lines in High Fire Threat Districts (HFTD)
Section 5, Recommendation 7	Reporting on General order (GO) 95 exempt equipment	Delete recommendation
Section 6, Recommendation 2	Analysis of quantity and effectiveness of outreach methods	Revise to state that the information is required for the 2023 WMP

Section and Recommendation	Subject	PG&E Recommendation
Section 6, Recommendation 3	Additional performance metrics to measure the success of community outreach	Revise to state that the information is required for the 2023 WMP

PG&E’s Comments on the Board’s Draft Guideline Recommendations:

1. Structure and Scope

PG&E does not have any comments on the three recommendations in this section, other than to note that if the 2022 WMP Guidelines are modified to include specific visual aids and tables, instructions for these visual aids and tables should be provided as soon as possible to give the utilities sufficient time to prepare these materials.

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

This section includes five recommendations. We are generally supportive of these recommendations, but also urge the Board to acknowledge in its recommendations that duplication of effort should be avoided. For example, in Recommendation No. 4, the Board suggests the establishment of a peer review process. With WSD leaving the California Public Utilities Commission (CPUC), there is a risk that the CPUC may require stakeholder or peer review of modeling in addition to WSD. The Board should expressly state in its recommendations that WSD should take into account modeling efforts initiated by the CPUC or others to ensure that there is no duplication of efforts. Given the limited resources of all parties, duplication would only be detrimental and lead to inefficiencies, slowing down the important risk modeling work ahead.

We also appreciate the Board’s acknowledgement of the importance of recognizing and protecting confidential data.² Some of the utilities’ data may include Critical Energy Infrastructure Information, which is protected by federal and state regulations, customer data, and other facilities and infrastructure information that cannot be shared publicly to avoid potential misuse by bad actors. As WSD, the utilities, and stakeholders develop processes for sharing risk modeling information, it is important to be mindful that some utility information will need to remain confidential to protect our customers and communities and prevent the malicious use of or dissemination of this information.

3. Public Safety Power Shutoffs: Reducing Scale, Scope and Frequency

² Draft Guideline Recommendations, p. 10.

This section of the Draft Guideline Recommendations includes six recommendations related to Public Safety Power Shutoff (PSPS) events.

PG&E supports the continued development of RSEs to evaluate wildfire mitigations and PSPS events. However, we propose two revisions to Recommendation No. 1 so that it more realistically reflects what can be accomplished before the 2022 WMP submission date.

First, Recommendation No. 1 should be revised to state that an RSE may not be required for each mitigation. While PG&E is making progress towards calculating additional RSE values and incorporating them into the resource allocation process across the company, there are a number of challenges with calculating and leveraging RSE values to evaluate all initiatives in the WMP. Some of the initiatives identified in the 2021 WMP Guidelines do not directly reduce risks and may not be best served by being evaluated in such a manner. For example, data governance and its associated sub-initiatives are very important, but these initiatives, in and of themselves, do not reduce wildfire ignition risk or wildfire consequences. For this reason, many of these types of initiatives would be considered as having an RSE of 0. However, that RSE value of 0 may not helpfully inform whether data governance initiatives are worth pursuing.

Second, Recommendation No. 1 requires RSEs to be calculated “at a circuit level.” This would significantly expand the work required to calculate RSEs. Given that WSD and the utilities are just now making substantial progress on calculating RSEs for mitigations at a service-area level, requiring calculations at the circuit level in the 2022 WMP may not be feasible and may detract from additional work that the Board recommends on other aspects of the RSE calculations. Rather than trying to do everything at once, we recommend that the utilities continue to refine their RSE calculations in the 2022 WMP and that the calculation of RSEs at a circuit level be incorporated into the 2023 WMP. This will give the utilities time to refine their RSE calculations and to undertake the significant effort of calculating RSEs at a circuit level.

4. Vegetation Management: Strategies and Environmental Stewardship

This section includes seven recommendations related to vegetation management. The recommendations in this section require some revision.

First, Recommendation No. 1 suggests that the utilities engage in a tree replacement program with a larger and broader scope as a part of their wildfire mitigation activities. This recommendation should not be adopted. When performing tree removal work, we focus on trees that are diseased, dying, or threatening our facilities. Tree removal is performed in consultation with experts in vegetation management. In some cases, it does not make sense to replant trees in the same environment as a tree that was just removed to potentially threaten our facilities again. In addition, while the utilities may have the legal right to remove or prune trees within an easement, it is not clear that the utilities have the right to plant new trees, especially on private property on which PG&E may have limited easement rights. Finally, the

utilities are not experts in tree planting and re-forestation of specific areas. Requiring the utilities to perform this work will require developing substantial new expertise and likely incurring substantial additional costs, as the Board recognizes.³

Second, Recommendation No. 2 includes an assumption that needs to be corrected and imposes additional oversight which is unnecessary. The wording of Recommendation No. 2 assumes that burned or singed trees are automatically removed following wildfire events, which is not the case for PG&E. Instead, we only remove trees that are dead, dying, or present a safety risk to our facilities or crews working to restore service. Recommendation No. 2 also suggests that the removing of healthy trees only occur with “some kind of environmental review by an independent ecologist.”⁴ This suggestion is vague because it does not explain the type or timing of the review. More importantly, however, it is unnecessary. We have a trained and experienced vegetation management team that determines whether a specific tree is dead, dying, or poses a risk to facilities or individuals working on our facilities. There is no need to add another layer of review onto the vegetation management process by having an “independent ecologist” review each tree removal decision. Moreover, this additional layer of review may slow the vegetation management process, resulting in increased wildfire risk associated with the delay in removing a dead, dying, or dangerous tree. Recommendation No. 2 should be deleted from this section.

Third, Recommendation No. 6 suggests that the utilities engage in pilot programs to plant low-growing shrubs in utility defensible space areas. This recommendation pre-supposes that low-growing shrubs have greater fire resistance than natural grasses, which may not be the case. This may also require the replacement of native grasses with non-native shrub species. Instead of planting additional vegetation under and around our facilities, we recommend the fuel reduction and fire-retardant methods described in our Revised 2021 WMP.⁵ This recommendation should be deleted or revised to indicate that the utilities should describe their recommended approaches for utility defensible space rather than prescribing one particular method or mandating a pilot program that may not be appropriate.

Finally, Recommendation No. 7 suggests that the utilities report on herbicide, pesticide, and other chemical use. This recommendation is not necessary. PG&E follows the International Society of Arboriculture (ISA) Integrated Vegetation Management (IVM) for Electric Utility Rights of Way ANSI A300 Part 7 and Best Management Practices which include the appropriate use of tree growth regulators and herbicides which have been demonstrated to be economically effective and efficient when properly applied. This information is publicly available. Therefore, these additional reporting requirements are unnecessary, and the recommendation should be deleted.

³ Draft Guideline Recommendations, p. 16.

⁴ Draft Guideline Recommendations, p. 17.

⁵ Revised 2021 WMP, pp. 694-695, 700-701, and 704-705.

5. System Design and Operation: Grid Hardening, Workforce Management, Asset Inspections, and Emerging Technology

This section identifies eight recommendations related to system hardening, workforce safety and qualifications, inspections, idle lines, and equipment reporting. We generally support these recommendations but have comments on Recommendations No. 6 and 7.

Recommendation No. 6 involves idle lines. We support this recommendation but suggest clarifying that it applies to idle lines in HFTD areas. While idle lines in non-HFTD areas may create some risks, there may also be reasons for keeping these lines in place and/or not de-energizing these lines. Since non-HFTD area idle lines pose significantly less wildfire risk, we suggest clarifying that this recommendation applies to idle lines in HFTD areas.

Recommendation No. 7 addresses reporting on GO 95 exempt equipment. The example provided by the Board is equipment that was constructed before 1941.⁶ However, separating out equipment into GO 95 exempt and non-exempt would be fact-intensive and time-consuming and would not necessarily assist the WSD in its efforts to track equipment for purposes of wildfire mitigation. Rather than separating equipment into GO 95 exempt and non-exempt, we suggest that information be provided based on the types of facilities, which is already done. Recommendation No. 7 should be deleted and instead the current reporting on equipment should continue.

6. Communication and Community Outreach: Performance Metrics and Improving Stakeholder Outreach Efforts

This section includes three recommendations regarding communication and community outreach. We generally support these recommendations but suggest that the timing for Recommendations No. 2 and No. 3 be changed to the 2023 WMP. Our 2021 surveys and measurement strategies that will inform the 2022 WMP have already been established and we are currently in the process of implementing the 2021 survey and measurement plan. In order to implement the Board's recommendations for the 2022 WMP, we would need time to develop effective strategies for surveying our customers to evaluate and determine if there are any correlations between the quantity of contacts and effectiveness of outreach methods (Recommendation No. 2) or to develop and include additional performance metrics to measure the success of community outreach efforts (Recommendation No. 3). Altering the survey and measurement approach that we have already established for 2021 would be challenging and likely inefficient.

The CPUC is also actively discussing the number of surveys that must be sent to customers in connection with the Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions, 18-12-005. In order to not overwhelm customers with multiple surveys, which can often have the effect of reducing customer involvement in the

⁶ Draft Guideline Recommendations, p. 20, n. 30.

survey process, we suggest that Recommendations No. 2 and No. 3 be revised to state that the required information be included in our 2023 WMP. This will allow PG&E and the other utilities sufficient time to design surveys for 2022 that address the Board's recommendation, the results of which can then be included in the 2023 WMP.

7. Safety Culture Assessment

This section identifies three recommendations regarding the scope and substance of WSD's safety culture assessment. We do not have any comments on these recommendations.


8. Expertise to Support Wildfire Safety

This section includes five recommendations related to WSD coordination with the CPUC and WSD staffing. We do not have any comments on these recommendations.

CONCLUSION

PG&E appreciates the engagement of the Board in providing these recommendations on future WMPs and related topics. Several of these recommendations are productive, while others may require a bit more refinement or consultation across multiple parties. We appreciate the opportunity to provide these comments and hope that they contribute to a continued, collaborative discussion across numerous stakeholders to further improve these processes and, more importantly, further our collective goal of eliminating utility-caused catastrophic wildfires. PG&E looks forward to further discussions and engagement as we all work together to further reduce wildfire risk and continue to make the WMP process more effective and efficient.

Sincerely,



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