

PUBLIC UTILITIES COMMISSION

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January 14, 2021

Robert Kenney
Vice President, Regulatory Affairs
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P. O. Box 770000
Mail Code: B23A
San Francisco, CA 94177

SUBJECT: Wildfire Safety Division Issuance of Pacific Gas and Electric Company's 2020 Safety Certification

Dear Mr. Kenney:

This letter constitutes the issuance by the Wildfire Safety Division (WSD) of Pacific Gas and Electric (PG&E) Company's 2020 Safety Certification, certifying that PG&E has met all the minimum requirements of Public Utilities Code (Pub. Util. Code) §8389, as detailed below, regarding its 2020 Safety Certification. This Safety Certification is valid for 12 months from issuance and has only the force and effect given to it by Pub. Util. Code §§451.1(c) and 8389.

On May 8, 2020, the WSD issued a guidance letter outlining the submission requirements for the 2020 Safety Certification requests pursuant to Pub. Util. Code §8389(f)(2).¹ On June 25, 2020, the WSD solicited stakeholder input on the 2020 Safety Certification requests and provided supplemental guidance on the meaning of an approved Wildfire Mitigation Plan (WMP) requirement under Pub. Util. Code §8389(e)(1).² PG&E submitted its 2020 Safety Certification request on July 29, 2020. Stakeholders submitted comments on August 9, 2020, and PG&E replied to comments on August 19, 2020.

Requests submitted for 2020 Safety Certifications are reviewed in accordance with the statutory requirements enumerated in Pub. Util. Code §8389(e). The WSD takes a particular interest, however, in how the utilities are implementing all the components required in the Safety Certification across the organization to reduce the risk of utility-caused catastrophic wildfires. Specifically, the WSD is attuned to understanding how key metrics identified in WMPs, Executive Compensation structures, and Safety Culture Assessments are aligned to ensure the reduction of wildfire risks.

¹ WSD's letter to PG&E providing WSD Guidance on Submission of 2020 Safety Certification Requests Pursuant to Public Utilities Code § 8389(f)(2). The guidance letter is dated May 6, 2020 but was served on the service list of Rulemaking 18-10-007 on May 8, 2020.

² WSD's letter soliciting Stakeholders input to the 2020 Safety Certification request - [WSD 2020 Safety Certification Process - Stakeholder Comments and Supplemental Guidance](#)

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The WSD has identified a number of ongoing concerns about PG&E's safety performance, which are detailed below. The WSD expects PG&E to resolve these concerns and continue all efforts to reduce their adverse impacts on safe operations and practices, regardless of the issuance of a 2020 Safety Certification. The WSD's issuance of PG&E's safety certification is separate from the Commission's enforcement authority and does not preclude the Commission from pursuing remedies for any conduct on the part of PG&E.

Discussion

For the purposes of this review, the WSD confirms that PG&E meets the minimum requirements for a Safety Certification under the following criteria in Pub. Util. Code §8389(e):

- Wildfire Mitigation Plans: Current year WMP must be approved, and the approved activities in the WMP must be in progress.
- Board of Directors: The electrical corporation's Board of Directors must have a safety committee comprised of members with relevant safety experience and establish an executive-level reporting structure to the Commission on safety issues.
- Executive Compensation: The compensation structure for the company's executives must have the proper incentives to reduce catastrophic wildfire risk.
- Safety Culture: The electrical corporation must agree to implement the findings of its most recent safety culture assessment.

Wildfire Mitigation Plans

Approved Wildfire Mitigation Plan

On February 7, 2020, PG&E submitted its 2020 WMP covering the years 2020 to 2022. Following a comprehensive review of PG&E's WMP and related stakeholder input, the Commission ratified the WSD's conditional approval of PG&E's WMP on June 11, 2020, via Resolution WSD-003. On the basis of the WSD's conditional approval of PG&E's 2020 WMP, PG&E has satisfied the requirement under Pub. Util. Code §8389(e)(1), that "the electrical corporation has an approved Wildfire Mitigation Plan (§8389 (e)(1))."

All electrical corporations that submitted a WMP were also subject to the 12 conditions listed in Resolution WSD-002, which found the electrical corporations' WMPs to contain deficiencies and required follow-up information to be submitted via a Remedial Compliance Plan (RCP),

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Quarterly Report, and its annual update.³ In addition, the WSD imposed several specific conditions on PG&E's WMP as listed in Resolution WSD-003.

The WSD acknowledges the comments and recommendations from stakeholders about whether to issue this Safety Certification to PG&E. The California Public Advocate's Office (Cal Advocates) and The Utility Reform Network (TURN) advocate against the issuance of a Safety Certification to PG&E until the WSD has found that PG&E has satisfied the conditions contained in WSD-002 and WSD-003. According to TURN, "until Class A deficiencies have been remedied, the utility's WMP is not in compliance with applicable requirements and thus cannot be deemed an 'approved' WMP under Section 8389(e)(1)." Similarly, Cal Advocates argues against issuing a Safety Certification based on conditional approval of the WMP, stating, "Issuing a safety certification based on a conditionally approved plan is not a practice that promotes safety and does not hold the electrical corporations accountable for resolving the deficiencies in their WMPs."

However, as was noted in the WSD June 25, 2020 letter seeking comments on the Safety Certification: "Commission ratification of the Wildfire Safety Division's approval of an electrical corporation's 2020 Wildfire Mitigation Plan, subject to the conditions specified in Appendix A of the ratifying resolution, constitutes documentation of an approved WMP pursuant to Pub. Util. Code § 8389(e)(1)."⁴ On the basis of the WSD's conditional approval of PG&E's 2020 WMP, PG&E has satisfied the requirement under Pub. Util. Code §8389(e)(1), that "the electrical corporation has an approved Wildfire Mitigation Plan (§8389 (e)(1))."

The WSD will continue to oversee compliance with the WMP, consistent with the criteria prescribed under 8386.3(c), including rectifying deficiencies identified in PG&E's WMP. In compliance with the Guidance Resolution WSD-002 and Resolution WSD-003, PG&E submitted an RCP and a Quarterly Report in response to deficiencies in the 2020 WMP.⁵ On December 30, 2020, the WSD released its analysis of PG&E's RCP, finding that PG&E's responses to each of the 8 Class A deficiencies were insufficient, and on January 8, 2020, the WSD released its analysis of PG&E's first Quarterly Report, finding that 23 responses out of 30 Class B deficiencies were insufficient. Concurrent with the issuance of its findings, the WSD issued Notices of Non-Compliance regarding PG&E's insufficient responses.

³ See [RES WSD-002 Final Guidance Resolution](#) for complete description of Remedial Compliance Plan, Quarterly Report, etc.

⁴ WSD clarification letter, June 25, 2020.

⁵ PG&E submitted its initial Remedial Compliance Plan (RCP) for the 2020 WMP on July 27, 2020 and its first Quarterly Report on September 9, 2020

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Implementation of the Wildfire Mitigation Plan

Pub. Util. Code Section 8389(e)(7) requires that the electrical corporation is implementing its approved WMP, including the submission of quarterly Tier 1 advice letters (ALs) containing the information required by this code section. To satisfy the requirements of §8389(e)(7), the electrical corporation was required to include with its request for a Safety Certification all Tier 1 ALs required by §8389(e)(7) submitted since issuance of the initial Safety Certification, along with an explanation of how the information reported in the advice letters complies with §8389(e)(7).

At the time of its letter seeking approval for the 2020 Safety Certification, PG&E had submitted three Tier 1 ALs on 2019 WMP implementation to comply with §8389(e)(7):

PG&E AL 5700-E on November 27, 2019

PG&E AL 5786-E on March 20, 2020

PG&E AL 5817-E on April 30, 2020

Subsequently, PG&E submitted the fourth AL related to WMP compliance covering 2nd Quarter 2020 and targets identified in the 2020 WMP, but that was after submission of its Safety Certification request.⁶ Additionally, PG&E submitted an AL in October 2020 documenting continuing implementation of the 2020 WMP.⁷ Per a briefing held with the WSD on January 6, 2021, PG&E reported that it had completed implementation of 34 out of 38 approved WMP initiatives. The WSD has approved PG&E's September 11, 2020 Change Order Report, resulting in a continuation of the subject initiative into 2021. The WSD is currently reviewing PG&E's December 11, 2020 Change Order Report. Therefore, PG&E has implemented, or an extension of time has been granted, for 35 of 38 planned 2020 initiatives.

The electrical corporation was also required to submit with its request for a safety certificate the results of any WSD compliance audits of 2019 WMPs or audits associated with 2020 WMPs, if any, along with an explanation of remedies. At the time of the request for Safety Certification, there were no completed compliance audits of the 2019 or 2020 WMP.

The WSD finds that PG&E's submissions are adequate to satisfy the requirement of Pub. Util. Code §8389(e)(7).

⁶ AL 5899-E, submitted July 31, 2020.

⁷ AL 5984-E, submitted October 28, 2020.

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Board of Directors

An electrical corporation must meet two requirements related to its Board of Directors to satisfy the statutory requirements for issuance of a subsequent Safety Certification. The first requirement states that its Board of Directors must have a safety committee comprised of members with appropriate and relevant experience. The second requirement states that the electrical corporation's board must establish executive-level reporting to the Commission on safety issues. The WSD requested documentation to verify these requirements.

PG&E submitted the names and curriculum vitae of its Safety and Nuclear Oversight (SNO) Committee to demonstrate their safety expertise. The SNO Committee consists of five members, who are independent directors with relevant safety expertise. The Chair is Cheryl F. Campbell, who has led the development of integrity management programs, which are developed to reduce the risk of, and improve the safety of key infrastructure. The other members of the SNO Committee are Admiral Mark E. Ferguson III, W. Craig Fugate, Michael R. Niggli,⁸ and Dean L. Seavers.

PG&E also provided biographical materials for each of the SNO Committee members, demonstrating that collectively they possess a variety of safety experience, technical and operational expertise "related to gas pipeline safety, electrical transmission and distribution safety, electric generation safety, nuclear safety, and occupational safety; expertise related to physical asset security and cyber threats; expertise related to pipeline safety management systems, enterprise risk management, and improving safety culture; and expertise related to procedures and protocols for safeguarding individuals and property in various threat contexts and public emergencies."

Should there be changes to the membership of the SNO committee, PG&E stated that the names and credentials of new members will be provided in PG&E's quarterly ALs filed pursuant

⁸ At the time of the Safety Certification Request, Michael R. Niggli's appointment was awaiting Federal Energy Regulatory Commission approval for him to serve on the Pacific Gas and Electric Company Board (he also serves on boards for the American Transmission Company and ESS, Inc.). On October 2, 2020, the FERC issued an order conditionally authorizing Mr. Niggli to serve as director of Pacific Gas and Electric Company while continuing his service on two other companies' boards of directors. PG&E reported that the Utility Board will consider Niggli's addition to the Utility Board and its committees, including the Safety and Nuclear Oversight Committee, at the Board's next regularly scheduled meeting. FERC Docket No. ID-3845-002. Email response to WSD data request, October 9, 2020.

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to Pub. Util. Code §8389(e)(7). Further, PG&E reported that it fulfills the requirements of §8389(e)(5) to communicate safety issues to the Commission via the information provided in its ALs. PG&E also submitted its Board-level communications to the Commission concerning its SNO Committee's safety-related activities as part of its quarterly ALs submitted pursuant to §8389(e)(7).

There have been several changes to PG&E's governance structure and executive management following its emergence from Chapter 11 bankruptcy. While the most recent board-level changes are reflected in its request for Safety Certification, an important executive officer change occurred after the request.

The Safety Certification request was signed by Andrew Vesey, then CEO of the PG&E utility, who subsequently left PG&E. Mr. Vesey had identified himself as the designated person for communication of safety matters with the Commission. PG&E subsequently verified that Michael Lewis, Interim President of PG&E, would serve as the designated person until a permanent chief executive was appointed.⁹ However, Mr. Lewis later indicated he intended to retire effective December 31, 2020. On November 18, 2020, PG&E announced the appointment of Patricia Poppe as CEO effective January 2021. Ms. Poppe is designated as the Company's Board-level reporting designee.

In addition, PG&E proposed a Board-level presentation to the Commission at least annually, or on a cadence requested by the Commission, through one or more designated members of the Board. PG&E proposed that this presentation be made to the Commission in a public forum that could be attended by the Commissioners and open to the public. PG&E proposed that these presentations also include the reporting required by Decision (D.) 20-05-053, approving PG&E's plan of reorganization after its emergence from bankruptcy. Such reporting is required by D.20-05-053 to come from the PG&E Board's SNO Committee (through one or more designated members), the Chief Risk Officer (CRO), and the Chief Safety Officer (CSO).¹⁰

PG&E has satisfied the minimum requirements of §8389(e)(3) and §8389(e)(5) for issuance of its 2020 Safety Certification. PG&E has established a safety committee with relevant expertise and has proposed appropriate executive-level reporting to the Commission, though the Commission may determine more frequent communications are desired from PG&E's executives or Board.

⁹ Email response to WSD Data Request from Meredith Allen, October 9, 2020.

¹⁰ Response to WSD Data Request, WSD_002-Q01, October 28, 2020.

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Safety Culture Assessment

Another criterion for Safety Certification relates to the utility's response to findings and recommendations from a Safety Culture Assessment specified by §8389(d)(4).

Pub. Util. Code §8389(e)(2) requires that "the electrical corporation is in good standing, which can be satisfied by the electrical corporation having agreed to implement the findings of its most recent safety culture assessment."

To date, the WSD has not implemented its recently approved process for annual Safety Culture Assessments, which is anticipated to begin in early 2021.¹¹ However, the Commission has an ongoing proceeding to investigate PG&E's Safety Culture.¹² In April 2016, the Commission's Safety and Enforcement Division (SED) tasked NorthStar Consulting Group (NorthStar) to assist with performing an assessment of PG&E's safety culture.¹³

In a 2018 decision, the Commission adopted NorthStar's report and recommendations, which PG&E agreed to implement and document via recurring reports.¹⁴ In March 2019, NorthStar performed its first updated report and recommendations, constituting PG&E's most recent safety culture assessment. The utility affirmed its commitment to NorthStar's recommendations in its Opening Comments on the Administrative Law Judge's ruling seeking comments on the status of the Safety Culture Investigation.¹⁵

In comments, TURN argues that PG&E cannot be found to be "in good standing" for the purposes of Safety Certification, in part because the company has been found to be criminally negligent for causing the November 2018 Camp Fire and 84 deaths. "PG&E simply cannot be certified as a safe utility when it has been convicted of these serious crimes and has not even attempted to explain why WSD and the public should be convinced that such crimes can never happen again."

¹¹ On November 19, 2020, the Commission approved an annual safety culture assessment process to begin in 2021 in Resolution WSD-011.

¹² I15-08-019, Order Instituting Investigation on the Commission's Own Motion to Determine Whether Pacific Gas and Electric Company and PG&E Corporation's Organizational Culture and Governance Prioritize Safety.

¹³ See Pacific Gas and Electric Company Safety Culture and Governance OII Prepared Testimony (January 8, 2018), at 2-1 ("PG&E agrees with all of the 61 recommendations directed at PG&E, commits to complete most recommendations by the end of 2018, and supports their adoption by the Commission.")

¹⁴ See D.18-11-050, Ordering Paragraph 1 and 2.

¹⁵ Opening Comments, August 4, 2020, pg. 17.

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In D.20-05-053, the Commission, in acknowledgment of PG&E's safety performance, imposed an Enhanced Oversight and Enforcement process, stating that "PG&E is receiving greater regulatory scrutiny regarding its safety performance solely because PG&E's safety performance has been so abysmal."¹⁶

As discussed in more detail below, the WSD shares TURN's and the Commission's concerns with PG&E's safety performance. However, the statute governing criteria for Safety Certification provides that for a finding of "good standing," the utility must agree to any findings made in the most recent Safety Culture Assessment. PG&E's submission supports a finding that it has agreed to the findings in its most recent Safety Culture assessment and therefore satisfies §8389(e)(2).

Executive Compensation

Pub. Util. Code §8389(e)(4) provides that the electrical corporation must establish an executive incentive compensation structure to promote safety as a priority, ensure public safety and utility financial stability with performance metrics, and include incentive compensation based on meeting performance metrics that are measurable and enforceable. This may include tying up to 100 percent of incentive compensation to safety performance and denying all incentive compensation in the event the electrical corporation causes a catastrophic wildfire that results in one or more fatalities.

PG&E asserts in its submission that its executive compensation structure satisfies the requirements of Pub. Util. Code §§8389(e)(4) and 8389(e)(6). To support this assertion, PG&E stated that its executive compensation structure was conditionally approved by the Commission on May 28, 2020 in its decision to approve the utility's plan for emerging from bankruptcy, subject to additional requirements imposed by that decision and future proceedings.^{17 18} According to PG&E, its executive compensation structure and the "additional requirements imposed by the Commission will go into effect immediately upon the effective date of the Plan of Reorganization."

¹⁶ D.20-05-053, pg. 68.

¹⁷ In D. 20-05-053 the Commission approved, with conditions and modifications, the reorganization plan of Pacific Gas and Electric Company (PG&E) and its holding company PG&E Corporation (PG&E Corp.) pursuant to the requirements of Assembly Bill 1054 (Ch. 79, Stats. 2019).

¹⁸ Investigation ([I.19-09-016](#)) Order Instituting Investigation on the Commission's Own Motion to Consider the Ratemaking and Other Implications of a Proposed Plan for Resolution of Voluntary Case filed by Pacific Gas and Electric Company, pursuant to Chapter 11 of the Bankruptcy Code, in the United States Bankruptcy Court, Northern District of California, San Francisco Division, In re Pacific Gas and Electric Corporation and Pacific Gas and Electric Company, Case No. 19-30088. Decision 20-05-053, May 28, 2020

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PG&E has satisfied the conditions of §8389(e)(4) and 8389(e)(6) for issuance of a Safety Certification via the Commission's findings in D.20-05-053 that PG&E's executive compensation program minimally and conditionally satisfies the conditions of the Public Utilities Code.

WSD Concerns

Although PG&E meets the minimum statutory criteria for issuance of its 2020 Safety Certification, the WSD acknowledges ongoing concerns with PG&E's implementation of its 2020 Wildfire Mitigation Plan and its conduct of safe operations. These concerns stem from the following, discussed in more detail below:

- Field Inspection Defect Findings
- Federal Monitor Findings
- Insufficiency of Responses to Class A and Class B Deficiencies in Resolutions WSD-002 and WSD-003.
- Customer Complaints
- Ongoing Cal FIRE Investigation into PG&E's Potential Involvement in the Zogg Mine Road Fire

Field Inspection Defect Findings

As of the date of issuance of this Safety Certification, the WSD's Compliance Branch has conducted 1657 inspection activities on PG&E compliance with WMP initiatives, finding 140 defects—for a defect rate of 8.4%. The WSD staff is working with PG&E to resolve expeditiously the 22 defects that remain open.

Findings include defects with vegetation too close to or touching power lines and other facilities, trees marked for removal, but not removed, and woody debris piles left on site without removing hazardous slash. Dangerous pole conditions have been noted, such as unstable "down guy" wires that anchor the pole to the ground, and significant woodpecker damage and pole cracking, raising concerns for Tag classification and applicable time to repair/replace. Several telecommunication assets have been found to be too close to utility assets. PG&E is expected to remedy all findings of defects in a timely manner and may face WSD or Commission action if it does not do so. In addition, the WSD is assessing PG&E's enhanced vegetation management compliance and has concerns over whether PG&E appropriately prioritized high-risk areas.

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Federal Monitor Findings

On October 16, 2020, the Federal Safety Monitor appointed by the US District Court for the Northern District of California to oversee PG&E's federal probation case issued a letter updating Judge William Alsup on its findings regarding PG&E's court-ordered mitigation activities—especially those related to vegetation management and infrastructure inspections. The Federal Monitor identified what it considered shortcomings and noted an increase in “exceptions” to the ordered activities. The Monitor stated that, among other issues, it believes PG&E completed its 2019 enhanced vegetation management in low-risk portions of its HFTD to meet 2019 targets, instead of prioritizing wildfire risk reduction in areas PG&E's own review designated as presenting the highest risk of wildfire.

On December 16, 2020, the Federal Monitor provided a further update to Judge Alsup on PG&E's vegetation management efforts, stating that while the majority of inspections conducted are in compliance, the Federal Monitor regularly finds that PG&E has missed trees marked for trimming. The Federal Monitor notes that PG&E's work review process appears to be improving, dropping from a previous finding of 7.1 exceptions per circuit mile to 2.3 potential exceptions per mile. The Federal Monitor also reported on instances of hazard trees, overhanging limbs, and radial clearances.

Further, the Federal Monitor noted in the December 16, 2020 letter that PG&E has stated it will not meet 3 of its 38 WMP commitments for 2020: deployment of Sensor IQ technology, missed PSPS restoration timeframes, and partial voltage detection on three-phase Smart Meters. However, through its “Change Order” process, the WSD granted an extension for the first WMP commitment through issuance of its evaluation of PG&E's September 11, 2020 Change Order Report. The WSD is currently evaluating PG&E's December 11, 2020 Change Order Report, which pertains to partial voltage detection on three-phase Smart Meters.¹⁹

While PG&E has met the minimum statutory requirements for issuance of a Safety Certification, the Federal Monitor's assertion that PG&E conducted vegetation management in low-risk areas to meet its 2019 plans suggests PG&E is manipulating its performance metrics. Judge Alsup continues to find PG&E in violation of terms of its probation. The WSD is incorporating the findings of the Federal Monitor into its ongoing compliance assessments. The WSD will continue to review PG&E's implementation of its 2020 approved WMP and may recommend

¹⁹The WSD issued its evaluation of PG&E's September 11, 2020 on January 5, 2021.

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enforcement or other action if it finds that PG&E has not substantially complied with the approved WMP work, including prioritizing work in HFTDs.

Insufficiency of Responses to Class A and Class B Deficiencies in Resolutions WSD-002 and WSD-003

As noted earlier, the WSD found PG&E's responses to be insufficient for 8 out of 8 Class A deficiencies and 23 out of 30 Class B deficiencies. While a conditional approval of PG&E's 2020 WMP is sufficient for compliance with §8389 (e)(1), the WSD is not precluded from recommending further enforcement or other action regarding PG&E's non-compliance with the conditions of Resolutions WSD-002 and WSD-003.

Customer Complaints

The WSD's Compliance Branch coordinates with the Commission's Consumer Affairs Branch and SED to address wildfire-related complaints. Since June 2020, 19 complaints have been received in PG&E territory, with over half related to vegetation hazards, including trees marked for removal but left unworked, trees not marked for removal although presenting an obvious risk, and vegetation concerns (trees being removed that do not pose a risk). Other complaints include vegetation debris left on private property and alleged equipment hazards.

Ongoing Investigation by CAL FIRE and the Safety and Enforcement Division into PG&E's Potential Involvement in the Zogg Mine Road Fire

On October 9, 2020, PG&E filed an Electric Incident Report (EIR) with the Commission when PG&E learned that CAL FIRE had taken possession of PG&E equipment as part of CAL FIRE's investigation into the cause of the Zogg Mine Road Fire (Zogg Fire) in Shasta County.²⁰ The Commission's SED has opened its own investigation into the Zogg Fire.

In the EIR, PG&E stated: "a PG&E SmartMeter and a line recloser serving that area reported alarms and other activity between approximately 2:40 p.m. and 3:06 p.m., when the line recloser de-energized that portion of the circuit. The data currently available to PG&E do not establish the causes of the activity on the Girvan 1101 circuit or the locations of these causes."

²⁰ PG&E Electric Safety Incident Reported- PG&E Incident No: 201009-13673; Zogg Mine Road and Jenny Bird Lane Igo, Shasta, October 9, 2020.

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The WSD cannot pre-judge the outcome of any Cal FIRE or Commission investigation; however, it will monitor the investigation and any conclusions Cal FIRE and/or the Commission reach regarding the Zogg Fire.

Conclusion

PG&E's request for a Safety Certification satisfies the statutory requirements in Pub. Util. Code §8389(e). The WSD expects PG&E to uphold the values stated in its submission and to advance safety as a top priority.

Further, the Commission has other mechanisms to hold PG&E accountable for safety violations, including Commission enforcement authority in Assembly Bill (AB) 1054, the Enhanced Oversight and Enforcement process approved in the Commission's decision approving PG&E's Plan of Reorganization related to its bankruptcy (D.20-05-053), formal investigations and proceedings into whether PG&E has violated any Commission rules, decisions, or orders and should be subject to penalties, and all other authority available to the Commission in the Public Utilities Code. The Commission will pursue any and all such remedies if circumstances so require.

This letter constitutes the issuance by the WSD of PG&E's 2020 Safety Certification, certifying that PG&E has met all the minimum requirements of Pub. Util. Code §8389. This Safety Certification is valid for 12 months from the date of this letter.

Sincerely,



Caroline Thomas Jacobs
Director, Wildfire Safety Division
California Public Utilities Commission