BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement Electricity Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018)	Rulemaking 18-10-007 (Filed October 25, 2018)

COMMENTS OF THE CALIFORNIA FARM BUREAU FEDERATION ON THE WILDFIRE MITIGATION PLAN OF PACIFIC GAS AND ELECTRIC COMPANY

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I. INTRODUCTION

Pursuant to the approval by Lucy Morgans, Acting Program Manager, Wildfire Safety Division, California Public Utilities Commission to the request for an extension to the schedule for submission of comments on the 2021 Wildfire Mitigation Plans, which allows opening comments to be submitted on March 29, 2021, the California Farm Bureau Federation ("Farm Bureau") hereby submits its Opening Comments on the Wildfire Mitigation Plan ("WMP") of Pacific Gas and Electric Company ("PG&E") dated February 5, 2021.

The California Farm Bureau Federation is California's largest farm organization, working to protect family farms and ranches on behalf of its nearly 32,000 members statewide and as part of a nationwide network of more than 5.5 million members. Organized 100 years ago as a voluntary, non-governmental, and nonpartisan organization, it advances its mission throughout the state together with its 53 county Farm Bureaus. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources. Farm Bureau works with the various county Farm Bureaus and their members throughout the PG&E service territory to identify solutions to address issues raised in this proceeding.

Although there are myriad issues that arise in conjunction with the WMP, Farm Bureau's focus is on the vegetation management aspect of the WMP[1]. Farm Bureau's members

[1] PG&E WMP, dated February 5, 2021, page 623, et. seq.

support thousands of miles of distribution and transmission line easements throughout PG&E's service territory on agricultural properties. Some members have properties in high fire threat areas, but it is important that the Commission understands the impact of PG&E's vegetation management program on landowners in non-high fire threat areas and how it impacts their overall program.

To be clear, our landowning members manage various types of income-producing tree crops, that are near and beneath both distribution and transmission lines. PG&E has become more and more insistent about increasing the levels of clearances required between the lines and trees, in some cases where landowners have been subject to varying requirements for decades. There have been many instances in the last few years where PG&E has expended resources to eliminate orchards under transmission lines, perhaps at the expense of their ability to provide manpower to manage vegetation in high fire threat areas. The Commission recognizes that although vegetation management of orchards is important for reliability concerns, they do not create a wildfire risk[2]. However, PG&E appears to be implementing vegetation management clearances as if orchards did create fire risks.

Farm Bureau is in concurrence regarding the importance of focusing on areas at risk of wildfires. The concern is that for the last several years PG&E has expended resources in non-wildfire areas, which may have reduced the availability of efforts to focus on

[2]See CPUC General Order 95, Rule 37, Table 1, footnote jjj, Page III-26, which recognizes that clearances from vegetation in the Fire-Threat District shall not apply to orchards of fruit, nut, or citrus trees that are plowed or cultivated.

reducing wildfire risks. It is this juxtaposition that Farm Bureau believes is important for the Wildfire Safety Division ("WSD") to focus on and reinforce the use of resources in areas prone to wildfires, rather than areas not at risk.

II. PG&E SHOULD BE REQUIRED TO REFOCUS ITS EFFORTS ON HIGH FIRE THREAT AREAS

In order to provide context to the concerns of Farm Bureau, it is important to understand how its members are impacted by PG&E's vegetation management activities in farming operations. Extensive acreage of orchard crops, such as nuts, fruit, and citrus, are grown by California's farmers under transmission and distribution lines operated by PG&E. Where lines pass near or through crop trees, vegetation management activities can significantly impact farming operations, as multiple trees, sometimes hundreds belonging to a single property owner, can be affected when trimming to maintain clearances around lines. Many Farm Bureau members own real property, which are subject to utility easements for transmission lines and distribution lines. These easements are in some cases over one hundred years old and in no way were drafted to encompass the type of rules and regulations currently imposed on these landowners.

Farm Bureau and its members have spent years in an effort to work cooperatively with PG&E to find satisfactory solutions that maintain the productivity of the orchards, while respecting the constraints that the utility must meet to ensure reliability. Those solutions have diminished dramatically in recent years, even as solutions that better accommodate compatibility with limited clearances have been daylighted, such as the

development of tree varieties that maintain a lower stature. Because Farm Bureau has an interest in seeing that utility caused wildfires are kept to a minimum and in seeing that its orchard owners can operate effectively with utility easements, its experience with vegetation activities throughout the PG&E service territory highlights the need to scrutinize PG&E's overall approach to vegetation management operations.

A Fall 2020 report by Assemblymember Robert Rivas, Chair of Assembly Committee on Agriculture, "Keeping California Our Nation's Agriculture Leader," recognized that utilities may be conducting vegetation management activities in orchards that are at the same levels as used to prevent wildfires. Stating that: "This practice can negatively impact orchards in particular. Reform is needed to make sure that electric utilities are not only prioritizing vegetation management in the regions of highest risk, but also having the minimum feasible impact on orchards."[3]

Farm Bureau members with utility line easements are faced with implications from the WMP in several ways. First, they have to cope with vegetation management requirements; second, if PG&E fails in the management of its system they must face the effects of wildfires, including impacts from smoke on their operations; third, they must face the increase in their electricity rates caused by the recent changes PG&E has put in place to strengthen their system to address wildfires; and finally, during wildfire season there is the ongoing potential for prospective de-energization of electric lines to

[3] Keeping California Our Nation's Agriculture Leader, dated Fall 2020, page 7. https://a30.asmdc.org/press-releases/20210325-assembly-ag-committee-chair-robert-rivas-issues-report-statewide-tour

prevent wildfires, PSPS events. Thus, agricultural customers face increased costs to manage for wildfire effects and also increased costs to their electrical rates.

III. THE WSD HAS ALREADY IDENTIFIED THE NEED TO BETTER ALIGN PG&E'S VEGETATION MANAGEMENT ACTIVITIES

The WSD identified in its evaluation of PG&E's Remedial Compliance Plan ("RCP") what Farm Bureau had been concerned about in the past few years: that PG&E had been using its efforts in non-high fire threat areas as ways to bolster its overall vegetation management performance. PG&E may have conflated areas that do not require enhanced vegetation management with those that are clearly within areas where increased clearances and heightened management can make an important difference. The WSD found that:

> PG&E conducted a statistical analysis using a 2015-2019 dataset comparing Enhanced Vegetation Management (EVM) to non-EVM and concluded that EVM is effective. There is no discussion about continued or regular analysis of EVM as more data is collected, and without continued data collection and analysis, the study may fail to effectively evaluate long-term effectiveness of EVM and account for changes both in EVM scope and external environmental effects. [4]

As the WSD continues to assess PG&Es overall vegetation management plan, it should scrutinize how PG&E intertwines its performance metrics with all areas in its service territory. PG&E provided a very limited response to the request of the WSD for more information as follows:

> **ACTION PGE-33 (Class A)**
>
> In its 2021 WMP update, PG&E shall
> 1) provide a detailed plan for how it intends to analyze and use extended vegetation clearance data specifically, including specific statistical methods it

[4] Wildfire Safety Division Evaluation of Pacific Gas and Electric Company's Remedial Compliance Plan, dated December 30, 2020, page 17.

intends to use and how it will control for environmental variables (e.g., wind, soil, elevation, species), and
2) provide a plan on how PG&E will continue analyzing and collecting data relating to measuring EVM effectiveness.

Response:

For this analysis, PG&E will calculate the following: past outages/ignitions where distance from tree to conductor was estimated to be 12 feet or less at the time of the outage/ignition as a proportion of total outages/ignitions. The resulting value will be considered as the population of outages/ignitions that will be reduced as a result of expanding clearance to 12 feet. The 12 foot expanded clearance will be obtained regardless of environmental conditions (e.g., wind, soil, elevation, species).
PG&E will update the outage/ignition data periodically to evaluate the effectiveness of the extended vegetation clearance. In addition, PG&E will analyze outage/ignition rates pre- and post-EVM treatment to track overall EVM effectiveness[5].

As these metrics are analyzed, there should be a clear separation between high fire threat areas and the remainder of PG&E's service territory. It is important that as this program moves forward, PG&E's vegetation management regime for its non-high fire threat areas does not impact fire-prone areas negatively.

As the RCP recognized, PG&E needed to clarify constraints faced by vegetation management labor availability.[6] Although PG&E references an increased workforce,[7] only an assessment of the performance of their activities in high fire threat areas can determine whether that increase has been sufficient in the past few years. From our members' experience, who have been faced with increasingly broader clearance requirements throughout orchards with electric line easements, it would have behooved PG&E to better balance their vegetation management focus on high fire threat areas.

[5] PG&E WMP, dated February 5, 2021, page 213.
[6] RCP, dated December 30, 2020, page 16.
[7] PG&E WMP, dated February 5, 2021, page 245.

In Farm Bureau's view, PG&E could make changes in how it addresses clearance requirements in easements across orchards that would require less manpower and expenses that could be directed more beneficially toward fire-prone areas. We encourage the WSD to continue to scrutinize both how PG&E reports on their vegetation management activities throughout the service territory and how they apportion their resources between high fire threat areas and the remainder of the service territory.

IV. CONCLUSION

Farm Bureau appreciates the opportunity to submit comments on this important element of utility operations. It is recognized that we are making recommendations on a limited slice of the overall WMP. However, it is an important element of looking at the overall operation of the system to effectively manage vegetation throughout the service territory. Farm Bureau recommends the WSD continue to analyze and assess how PG&E operates its vegetation management operations as a whole to ensure that adequate resources are placed in high fire threat areas.

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Respectfully submitted,



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