



October 14, 2020

VIA E-MAIL
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Caroline Thomas Jacobs, Director
Wildfire Safety Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**Subject: Pacific Gas and Electric Company's Reply Comments to Comments Received on our
Condition B Submissions**

Dear Ms. Jacobs:

Pacific Gas and Electric Company (PG&E) submits today its Reply Comments to the Comments submitted by Green Power Institute (GPI Comments), Mussey Grade Road Alliance (MGRA Comments), Public Advocates Office (Cal Advocates Comments) and Small Business Utility Advocates on our submissions in response to Condition B requirements. PG&E has reviewed all the Comments and appreciates the input from these parties. PG&E appreciates the opportunity to provide this Reply; however, due to the 5-page limit we are focusing the majority of our discussion on those Comments that suggest our submission did not meet the requirements of the Class B Conditions that were required in the first quarterly report. For the remainder of the issues raised in the Comments we provide limited responses or do not address them at all because we either agree with them,^{1/} or they appear to be suggestions for future improvement to the WMP process,^{2/} in which case we suggest that to the extent WSD wants to consider them, they belong in the 2021 updated WMP templates. Based on the comprehensive quarterly report we filed on September 9th, and for the reasons discussed below, PG&E's Condition B submission meets the requirements set forth in each Condition and Wildfire Safety Division (WSD) should approve PG&E's Condition B submission as is.

^{1/} Comments PG&E agrees with include GPI Comments suggesting streamlining the WMP procedural schedule and Cal Advocates Comments suggesting further workshops on vegetation management.

^{2/} The following Comments are suggestions for improvement but not reflective of requirements of either the 2020 WMP nor the Class B Condition. Some examples include Cal Advocates request for ongoing Vegetation Management Quality data and Cal Advocates, MGRA and GPI's requests related to more detail and discussion on Risk Spend Efficiency (RSE), among other topics.

A. PG&E's Reply Comments to suggested deficiencies of PG&E's Quarterly Report Submission:

- 1) Cal Advocates Comments suggest PG&E did not fully address the WSD's directive in Condition PG&E-5.^{3/}

PG&E's Reply Comment: PG&E provided 100% of the GIS information that was possible of the 5,500-line miles inquired about by WSD; the 4,900-line miles of GIS information that PG&E provided represents 89% of the original population. The only reason PG&E did not provide GIS information for the remaining 600 miles is because that information does not exist any longer. PG&E explained the background for this in more depth in the Data Request response to Cal Advocates that they referenced in their comments: "the analysis of PG&E's electric distribution circuits that identified the highest risk segments, totaling 5,500 miles, was completed in 2018 based on the features and details of PG&E's distribution system at that time. The analysis was performed on PG&E's electric distribution line miles that run through Tier 2 and Tier 3 areas by "Protection Zone" which break up whole electric distribution circuits by where protection devices exist (like line reclosers, fuses or other devices). The 600 miles PG&E could not precisely identify are generally because the device that identified the start or end of the protection zone no longer exists in PG&E's GIS system. PG&E's GIS system is a current picture of the assets in place and when a device or asset is replaced the old device is removed from the system." Given that fact, PG&E's response to PG&E-5 was more than substantially compliant with WSD's directive. Regarding Cal Advocates' suggestion that WSD require PG&E to explain whether these circuits are still the highest priority segment miles, there is no need to do so. PG&E has met with Cal Advocates to explain this issue in more detail, has responded to Cal Advocates' data request, and, most importantly, as discussed in our response back in July to Condition-3, PG&E is completely revising its risk analysis and quantification to create an updated risk priority list. PG&E can share the outcomes of that updated risk quantification, including the locations of the highest priority circuits. Since we have more than substantially met the requirements of PGE-5, PG&E believes further discussion on this should focus on the new risk analysis work being performed, and not on the 5,500-line miles that was based on the 2018 risk analysis.

- 2) Cal Advocates Comments suggest PG&E's response to Condition Guidance-5 did not sufficiently address WSD's requirement to disaggregate its costs to the individual initiative level.^{4/}

PG&E's Reply Comment: PG&E provided a breakdown of all our programs into individual initiatives and reported spending on each initiative, in our updated 5.3 tables that were attached to our submission and referenced in the response to Condition Guidance-5. We would be interested in discussing this issue further with Cal Advocates, or other parties as needed, given that it appears they did not understand what we submitted in our quarterly report on the breakdown of

^{3/} See Cal Advocates Comments, page 4, section IV.A.

^{4/} See Cal Advocates Comments, page 5, section IV.B.

initiatives. Cal Advocates statement that “PG&E does not even claim to have attempted to disaggregate its costs to comply with WSD’s condition,” is, respectfully, simply not true. As we explained in our response to Condition Guidance-5: “PG&E has undertaken analyses to estimate the cost, risk reduction benefit, and other details for each WSD-defined initiative.”^{5/} Therefore, PG&E’s submission provided the disaggregated costs at the initiative level and more than substantially met the requirements of Guidance-5 with its updated 5.3 tables.

The two comments above from Cal Advocates are the only comments on PG&E’s quarterly reporting which directly suggest any deficiency in PG&E’s first quarterly report. For the reasons stated above, PG&E disagrees with Cal Advocates that PG&E’s submissions were deficient and suggests that the WSD approve PG&E’s quarterly report. Our remaining comments relate to some of the suggestions or questions raised by parties in the Comments submitted that do not reflect deficiencies in the filed quarterly report.

B. PG&E’s Responses to Comments on Future Improvement Opportunities:

- 1) GPI Comments suggests streamlining the procedural schedule.^{6/}

PG&E’s Reply Comment: PG&E agrees with the need to streamline the procedural schedule of the overall WMP process, particularly GPIs statement: “GPI encourages the exploration of ways in which planned changes to the WMP filing structure can aggregate quarterly, annual, and triennial WMP filings into fewer compliance filings that effectively and efficiently centralize plan content and allow more thorough review.” The aggregation of WMP filings into fewer filings would ensure greater efficiency for all parties and enable utilities to better manage resources focusing on wildfire mitigation work, particularly during the peak of wildfire and PSPS season, which includes the present timeframe.

- 2) Cal Advocates suggested that the WSD should hold workshops to facilitate sharing of best practices regarding at-risk tree species.^{7/}
- 3) GPI Comments included requests for additional information on vegetation management practices including related to vegetation waste and fuel management, additional programs for clearances and other items.^{8/}

^{5/} Beginning on page 28 of PG&E’s first quarterly report, available at:
https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/PGE-WildfireMitigationPlans-QuarterlyReport.pdf

^{6/} GPI Comments page 1.

^{7/} See Cal Advocates Comments, page 4, section III.B.

^{8/} GPI Comments pages 7, 8 & 9.

PG&E's Reply Comment: PG&E appreciates Cal Advocates' and GPI's interest in more detail and their raising of concerns about Vegetation Management. PG&E is happy to engage further on this topic either directly or through WSD / CPUC processes and workshops. However, PG&E's responses to the vegetation management related questions met the requirements of the assigned conditions and these comments are focused more on the scope of future and ongoing filings, processes and details to be reviewed. Therefore, PG&E is open to working with the WSD, parties and the other CA utilities to share in more depth our existing vegetation management practices and programs, the best practices on identifying and mitigation at-risk species.

- 4) Cal Advocates raised concerns about PG&E's quality assurance results for its enhanced vegetation management program in relation to PG&E-19.^{9/}

PG&E's Reply Comment: PG&E's understanding of this comment is not actually a criticism of our quarterly report filing, but instead a request from Cal Advocates that PG&E "continue to provide updates on its quality assurance results for its enhanced vegetation management program in future Quarterly Reports". PG&E would be open to ongoing reporting of vegetation management QA performance if the WSD believes this to be of critical importance to the WMP process, but this comment does not materially impact the adequacy of PG&E's quarterly report.

- 5) Several parties provided comments about the continued evolution and improvements to RSEs (Risk Spend Efficiency), including:
- a. Cal Advocates statement: "The WSD should require electric utilities to present a plan to complement expert judgment with empirical evidence when estimating the mitigation effectiveness of WMP activities."^{10/}
 - b. MGRA Comments discuss the need to further address RSEs for foundational or mandated activities.^{11/}

PG&E's Reply Comment: Parties comments reinforce that RSEs are a critical tool, and PG&E agrees, but there are several complex issues that remain to be addressed. PG&E would encourage WSD to devote a track, working group or at least further workshops to understanding what is feasible and what is not in terms of rapidly escalating the maturity and data-specificity of RSE calculations. Through the SMAP and RAMP processes the utilities, CPUC and parties have been working on this issue for several years and have established a feasible pace of change to date. Expecting that the WMP process in one year or so can drive substantially increased maturity in the RSE and related tools, for example broadly replacing SME insight with data-driven quantification, is infeasible and

^{9/} See Cal Advocates Comments, page 6, section IV.C.

^{10/} See Cal Advocates Comments, page 3, section III.A.

^{11/} MGRA Comments at page 2, section 1.1.

could lead to negative outcomes, for example rushed, improper calculations upon which decisions may then be based. Further discussion and engagement on the topic of RSEs going into the 2021 WMP, or as part of the 2021 proceeding, would be of interest to many parties.

- 6) MGRA Comments include situational awareness response time and evacuation information and egress score calculations.^{12/}

PG&E's Reply Comment: As with other comments discussed in this section, MGRA Comments request new data and further analysis than was required in the Condition B responses. If this is an area that is deemed appropriate for further assessment PG&E is happy to engage further in how we have approached these concepts and how we can continue to improve these analyses going forward. PG&E notes that there appear to be a long list of potential areas that parties may be interested in diving deeper. However, as noted by parties in these Comments and in previous discussion, the scope of the WMP must be thoughtfully considered to support a successful outcome, if the scope is too broad it may spread resources and time too thin to adequately engage on any topics.

In summary, based on the discussion above, PG&E has shown that none of the Comments indicate a deficiency with any component of our Condition B submission and WSD should approve our Condition B submission as is. PG&E looks forward to continued conversation and collaboration with the WSD, GPI, MGRA, Cal Advocates, SBUA, and all other stakeholders as part of our collective wildfire risk mitigation efforts associated with utility equipment.

Sincerely,



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cc: R.18-10-007 service list

^{12/} MGRA Comments at pages 9 and 10, sections 4.1 & 4.2.