Protect Our Communities Foundation
4452 Park Blvd #309
San Diego, CA 92116

April 9, 2021

California Public Utilities Commission
Wildfire Safety Division
Attention: Wildfire Safety Advisory Board
505 Van Ness Avenue
San Francisco, CA 94102

Re: The Protect Our Communities Foundation Comments to Draft Recommendations on the 2021 Wildfire Mitigation Plan Updates for Large Investor-Owned Utilities

Dear Wildfire Safety Advisory Board:

The Protect Our Communities Foundation (PCF) submits these comments pursuant to the April 1, 2021 email from the Wildfire Safety Advisory Board (the Board) to the service list for R.18-10-007. The comments below address the Board's Draft Recommendations on the 2021 Wildfire Mitigation Plan Updates for Large Investor-Owned Utilities, dated April 1, 2021. PCF appreciates the Board's thoughtful review of the utilities' 2021 WMP Updates and the Wildfire Safety Division's (WSD) efforts to date and suggests revisions necessary to comply with the legislative mandates for the utilities to mitigate and prevent wildfires.

I. PCF GENERALLY SUPPORTS THE SPIRIT OF THE BOARD'S RECOMMENDATIONS, BUT WSD SHOULD FURTHER VERIFY THE UTILITIES' WMPS TO ENSURE FEASIBILITY AND COST-EFFECTIVENESS.

PCF shares the Board's concern that the "assumptions, algorithms, and outcomes of the models are not being closely and transparently reviewed by independent experts to ensure they meet scientific standards."[1] As PCF has argued repeatedly[2], the WMP template used by WSD

[1] Wildfire Safety Advisory Board, Draft Recommendations on the 2021 Wildfire Mitigation Plan Updates for Large Investor-Owned Utilities, April 1, 2021 ("WSAB Draft Recommendations"), p. 4.
[2] The Protect Our Communities Foundation Comments on the 2020 Wildfire Mitigation Plans Pursuant to Resolution WSD-001, April 7, 2020; The Protect Our Communities Foundation Comments on the 2021 Wildfire Mitigation Plans Pursuant to Resolution WSD-001, March 29, 2021.

cannot be relied on and does not provide verification of compliance with the requirements of Public Utilities Code Section 8386 because the template relies upon the utilities' self-reporting, and because the metrics are inadequate to determine the effectiveness of the utilities' mitigation initiatives.

PCF agrees that "without undergoing a transparent peer review process, neither the WSD nor the public can verify the accuracy of these models… these models must be vetted to ensure the prudent use of ratepayer funds."[3] To create a transparent peer review process that would ensure the accuracy of the utilities' models and assumptions, the Board should recommend that the Commission allow evidentiary hearings to assess the feasibility and relative cost effectiveness of the proposed safety measures and models. WSD should further examine the facts and determine whether expert support exists for the utilities' initiatives.

If needed, WSD possesses the authority to extend the time for WMP approval pursuant to WSD-011, which recognizes that the Commission may need extended time to verify the WMPs to ensure that the plans meet the statutory requirements laid out in Section 8386.[4] WSD should also permit other parties to submit alternative measures for the consideration of WSD, the Board, and the Commission. Through evidentiary hearings, a needed development of the factual record can be obtained to allow for a more thorough and fact-based evaluation of the utilities' proposed initiatives. Thus, PCF requests that the Board's draft recommendations should be revised to

[3] WSAB Draft Recommendations, p. 4 ("All three of the IOUs' WMP Updates appear to track faults and wire down events that could have but did not result in a fire and categorize these events as near misses. However, none of the WMP Updates discuss taking the data collected when investigating near miss events and cross referencing it with PSPS events in areas where the IOUs have completed mitigation efforts for the purposes of evaluating the effectiveness of their mitigation efforts and resource allocation.").

[4] *See* Resolution WSD-011: Resolution implementing the requirements of Public Utilities Code Sections 8389(d)(1), (2), and (4), related to catastrophic wildfire caused by electrical corporations subject to the Commission's regulatory authority, p. 13. ("The WSD may modify the 2021 WMP schedule as deemed necessary via written notice to stakeholders subject to the statutory parameters set forth in § 8386(b).") *See also* Pub. Util. Code § 8386(b) ("In calendar year 2020, and thereafter, the plan shall cover at least a three-year period. The division shall establish a schedule for the submission of subsequent comprehensive wildfire mitigation plans, which may allow for the staggering of compliance periods for each electrical corporation. In its discretion, the division may allow the annual submissions to be updates to the last approved comprehensive wildfire mitigation plan; provided, that each electrical corporation shall submit a comprehensive wildfire mitigation plan at least once every three years.")

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include an explicit recommendation for evidentiary hearings before WSD approves any 2021 WMP update.

A. The utilities' vegetation management practices need to be vetted thoroughly to ensure that they do not exacerbate climate change.

PCF applauds the Board's position that the "utilities must consider the impact on the climate, the local ecosystem, and wildfire risk when removing trees." Moreover, PCF agrees that a "one-size fits all approach to vegetation management is not practical because of the research necessary to perform environmentally sustainable vegetation management practices" and that "the WSD must evaluate whether utility wildfire mitigation practices increase the risk of wildfire or negatively impact climate change," [5] which WSD has not yet done.

Any utility wildfire mitigation program should "minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks."[6] Removing healthy trees *increases* climate change risks and consequently conflicts with Commission statutory mandates unless found to be the only option that works to prevent wildfires.[7] PCF considers the issue of whether or not utility wildfire mitigation practices increase the risk of wildfire and create adverse reactions that further climate change as a material issue of dispute; and continues to request evidentiary hearings on this issue to assist the Commission in the assessment and development of facts about the effects of the utilities' vegetation management programs on climate change and compliance with California's GHG emissions reduction requirements.

B. Metrics need to be established and vetted to determine cost-effectiveness and the overall success of all proposed utility initiatives.

PCF appreciates the Board's recommendation to ensure evaluation of the cost-effectiveness of the 2021 WMP Updates. The Board's recommendations clearly incorporated

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[5] WSAB Draft Recommendations, p. 6.
[6] Pub. Util. Code, § 8386, subd. (c)(3).
[7] Jean-Francois Bastin et al., *The global tree restoration potential*, Science (July 5, 2019); *see also* The Guardian, *Tree planting 'has mind-blowing potential' to tackle climate crisis*, available at https://www.theguardian.com/environment/2019/jul/04/planting-billions-trees-best-tackle-climate-crisis-scientists-canopy-emissions; The Guardian, *Greta Thunberg: 'We are ignoring natural climate solutions' Film by Swedish activist and Guardian journalist George Monbiot says nature must be used to repair broken climate*, available at https://www.theguardian.com/environment/2019/sep/19/greta-thunberg-we-are-ignoring-natural-climate-solutions.

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stakeholder suggestions about incorporating customer input. Particularly, PCF agrees that "it would be useful to establish metrics to evaluate the impacts, cost-effectiveness, and general success of the IOUs' programs from the target populations' perspective."[8] As PCF previously delineated,[9] incorporating customer feedback into mitigation measures remains critical for those measures to be effective.

Customer feedback consists of just one metric that can be utilized to determine the cost-effectiveness of utility initiatives. Concomitant with the incorporation of customer feedback, WSD and the Commission must strengthen the evaluation of the impacts and cost-effectiveness of all the utilities' programs.

II. THE UTILITIES FAIL TO INCORPORATE NECESSARY METRICS IN THEIR DATA COLLECTION.

PCF continues to be concerned that the utilities do not appropriately account for near-miss events in their data collection.[10] As PCF as previously pointed out[11], SDG&E's WMP lacks any discussion of both near-miss incident categories and data about the rates of near-misses. PCF shares the Board's concern that the lack of discussion of near-miss exemplifies a missed opportunity to analyze the collected data. PCF also questions whether the utilities are performing such evaluation and analyses, and if so, recommends that WSD require the utilities to report on those efforts and any findings. [12] Data that is inclusive of near-miss events is critical to not only address risk, but also to adjust and reallocate program funds to reduce fire risk. Thus, PCF suggests that the Board include a discussion of the problems inherent in SDG&E's WMP in its final recommendations, as emblematic of the lack of the needed analysis of near misses and the too narrow data collection efforts contained in the utilities' WMPs.

[8] WSAB Draft Recommendations, p. 14
[9] The Protect Our Communities Foundation Comments on the 2021 Wildfire Mitigation Plans Pursuant to Resolution WSD-001, March 29, 2021, pp. 7-8.
[10] WSAB Draft Recommendations, p. 12.
[11] The Protect Our Communities Foundation Comments on the 2020 Wildfire Mitigation Plans Pursuant to Resolution WSD-001, April 7, 2020, p. 7.
[12] WSAB Draft Recommendations, p. 12.

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III. CONCLUSION

PCF commends the Board for accomplishing all that it has accomplished to date. PCF respectfully requests that the Board revise its recommendations to reflect the importance of discussing issues present in SDG&E's WMP and independently verifying utility WMP initiatives and cost-effectiveness in its final recommendations.

Respectfully submitted,

/s/ Julia Severson

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Dated: April 9, 2021

CC: All Parties on Service List(s): R.18-10-007
Wildfire Safety Advisory Board, WildfireSafetyAdvisoryBoard@cpuc.ca.gov