



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

June 6, 2023

Caroline Thomas Jacobs
Director, Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Electronically Filed to Docket # 2023-2025-WMPs

RE: Reply Comments of the Rural County Representatives of California on Large Investor-Owned Utility 2023-2025 Wildfire Mitigation Plans

Dear Director Thomas Jacobs:

On behalf of the Rural County Representatives of California (RCRC), we provide these reply comments on the large investor-owned utility (IOU) 2023-2025 Wildfire Mitigation Plans (WMPs).¹ RCRC is an association of forty rural California counties, and our Board of Directors is comprised of elected supervisors from each member county.

RCRC appreciates the unified interest of stakeholders, specifically the California Public Advocates Office (Cal Advocates), the Joint CCAs (comprising Marin Clean Energy, Sonoma Clean Power Authority, Pioneer Community Energy, and East Bay Community Energy), and the Joint Local Governments (counties of Marin, Napa, San Luis Obispo, and Sonoma, and the city of Santa Rosa), for better regulations and oversight of utility grid operations of fast-trip settings. RCRC agrees that more scrutiny is needed given the harm that frequent, prolonged power outages have on customers, not unlike Public Safety Power Shut-offs (PSPS). Specifically, we urge the favorable consideration of the following stakeholder suggestions:

- Update 2024 WMP guidelines to include key fast-trip statistics; identification of frequently de-energized circuits; objectives for reducing the scale, scope, and frequency of fast-trip de-energizations; performance metrics identified by the utility; protocols for enabling fast-trip settings; communication strategy for enabling fast-

¹ PG&E's 2023-2025 Wildfire Mitigation Plan, submitted 03/27/2023; and 2023-03-27_SCE_2023_WMP_R0

trip settings; and planning and allocation of resources for service restoration for outages on lines with fast-trip setting enabled.²

- Require utilities to provide localized information to customers when it enables fast-trip settings, so customers have time to prepare—and communicate using easy to understand lay terminology.³
- Require utilities to perform detailed risk- and ignition-reduction modeling, as well as a robust analysis of the scope of its program relative to the likely reductions, of its fast-trip program;⁴
- Require PG&E to develop methods to reduce reliance on its Enhanced Powerline Safety Settings (EPSS) program long-term and instead address the root causes of risk on its deteriorating grid;⁵
- Require PG&E to provide a detailed analysis of the predicted 2% year-over-year improvements to its planned fast-trip mitigation measures and potentially revise the scope of its program;⁶ and
- Greater cross-agency coordination between Energy Safety and the California Public Utilities Commission (CPUC) on fast-trip de-energization oversight and regulatory parameters to preserve public safety and protect the public interest.⁷

Additionally, RCRC shares many of the questions raised by stakeholders on the expansion of utility undergrounding. We support the recommendation by Cal Advocates to require PG&E to describe its policy for undergrounding secondary conductor and address the effects that any remaining overhead poles and wires pose generally.⁸ We also agree that it would be prudent for Energy Safety to form a working group to jointly address supply chain issues and other implications of the large ramp up of undergrounding.⁹

Lastly, RCRC agrees with Cal Advocates that an audit of PG&E's management of vegetation management contractors is sensible to ensure compliance with best practices and to improve safety performance.¹⁰ Rural counties have experienced numerous programmatic missteps with PG&E's vegetation management activities and a comprehensive review of the new replacement programs compared to legacy Enhanced Vegetation Management is reasonable.

² Page 85, *Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities*, May 26, 2023.

³ Page 87-88, Cal Advocates.

⁴ Page 1, *Joint Local Governments' Comments on PG&E 2023-2025 Wildfire Mitigation Plan*, May 26, 2023.

⁵ Page 40, Cal Advocates.

⁶ Page 1, Joint Local Governments.

⁷ Page 1, *Opening Comments of Marin Clean Energy, Sonoma Clean Power Authority, Pioneer Community Energy, and East Bay Community Energy on PG&E's 2023-2025 Wildfire Mitigation Plan*, May 26, 2023; page 88, Cal Advocates; and page 2, Joint Local Governments.

⁸ Page 42, TURN.

⁹ Page 83, Cal Advocates.

¹⁰ Page 43, Cal Advocates.

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Thank you for your consideration of our comments. If you have any questions, please do not hesitate to contact me at (916) 447-4806 or lkammerich@rcrcnet.org.

Sincerely,

A handwritten signature in blue ink, reading "Leigh Kammerich". The signature is fluid and cursive, with the first name "Leigh" written in a larger, more prominent script than the last name "Kammerich".

LEIGH KAMMERICH
Policy Advocate