



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

August 22, 2023

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

*Electronically Filed to Docket # 2023-2025-WMPs*

**RE: Opening Comments of the Rural County Representatives of California on  
PG&E's Revised 2023-2025 Wildfire Mitigation Plan**

Dear Director Thomas Jacobs:

On behalf of the Rural County Representatives of California (RCRC), I am pleased to provide comments on PG&E's Revised 2023-2025 Wildfire Mitigation Plan (WMP) submitted on August 7, 2023. RCRC is an association of forty rural California counties, and our Board of Directors is comprised of elected supervisors from each member county.

We appreciate the ongoing dialogue between PG&E and counties impacted by the lamentable execution of, and abrupt end to, the Enhanced Vegetation Management (EVM) program. Counties have received a verbal pledge that slash and large wood debris will be hauled away by PG&E at the request of the property owner. We value this commitment; however, the Revised WMP still does not explicitly make durable assurances to that effect. Given previous experiences, this continues to be of great concern to our counties and their residents, especially considering PG&E's previous WMP explicitly noted that wood haul was a component of its EVM program and given the lack of a similar commitment within the successor vegetation management programs contemplated in the 2023-2025 base WMP. As similarly observed in Energy Safety's Revision Notice for Vegetation Management and Inspections, "PG&E provides some internal targets but does not commit to them as WMP targets."<sup>1</sup> Much like Energy Safety, RCRC also seeks more measurable vegetation management commitments within the base WMP.

According to PG&E, 85% of felled trees have been addressed from the legacy EVM program, which is a great achievement and a massive improvement from December

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<sup>1</sup> Page 18, *Office of Energy Infrastructure Safety Issuance of Revision Notice for Pacific Gas and Electric Company's 2023-2025 Wildfire Mitigation Plan*, June 22, 2023.

2022. RCRC is certainly sympathetic to the challenges PG&E faces to dispose large quantities of woody biomass given the lack of commercial timber operations and biomass facilities (largely driven by state policy). Much of the feedback from communities is that PG&E's vegetation management activities—from inspection to clean-up—still remains very sporadic and scattershot. Much like the operational efficiencies PG&E expects to realize in response to critical issues identified by Energy Safety on the backlog of asset repairs<sup>2</sup>, PG&E should similarly strategize how to conduct vegetation management work (especially clean-up and wood haul) in one “zone” at a time to improve customer experiences by minimizing disruptions overall and long periods of downstream risk being borne on the customer (e.g., haphazard logs that can obstruct driveways, encroach defensible space, and increase fuel load).

### **General; Grid Design, Operations and Maintenance; PSPS**

PG&E's Revised WMP provides key modifications around undergrounding overhead distribution primary and secondary lines. RCRC appreciates the clarifications of PG&E that parallel secondary lines will be undergrounded, and that remaining overhead secondary lines will be hardened, as well as efforts to benchmark their program with other utilities.

RCRC values Energy Safety's analysis of the Enhanced Powerline Safety Settings (EPSS) program and its required remedies. We, too, share the struggle to balance safety and reliability and desire a long-term plan to achieve both. We appreciate the additional customer outreach that PG&E will perform to customers for greater EPSS preparedness. RCRC's overarching goal is to ensure long-term system hardening projects are effectively invested to achieve safety and reliability outcomes.

While PG&E's Response to Energy Safety's Revision Notice was filed prior to July 2023 EPSS data becoming available, overreliance on 2022 EPSS data will underestimate the impacts of future EPSS potential. For one, as noted by PG&E, 2022 largely had favorable weather and no strong offshore wind events.<sup>3</sup> Secondly, more outages can be expected given PG&E's decision to sunset the Enhanced Vegetation Management program's aggressive removal of hazard trees with overstrike potential on powerlines. The Enhanced Vegetation Management Program was in place during 2022 when there were approximately 2,400 EPSS outages. In July 2022, there were 383 total EPSS outages; in July 2023 there were 493—a 28% increase. Even worse, 21 circuits saw four or more EPSS outages in the month of July alone. One circuit experienced eight outages in a single month while another experienced seven outages in a single month. While we understand that PG&E is performing reviews of multiple outage circuits, it is important to

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<sup>2</sup> See Energy Safety RN-PG&E-23-04: PG&E does not demonstrate how it will address its growing backlog of asset repairs.

<sup>3</sup> Page 113, PG&E Revision Notice Response, August 7, 2023.

communicate to the impacted residents and local governments those reviews, their findings, and remedies that will be implemented to reduce the risk of future outages.

We expect PG&E to soon release the segments it will include in its 10,000-mile undergrounding plan via the Senate Bill 884 process. We urge careful comparison of these segments proposed for undergrounding with those circuits experiencing multiple EPSS outages. For high EPSS risk circuits that are planned for undergrounding, we strongly urge expedited activities to reduce the risk of EPSS outages until the undergrounding work has been completed. For high EPSS risk circuits that are *not* planned for undergrounding, we strongly suggest combining mitigation work with deployment of covered conductors to reduce the risk of damage and outage caused by animal contact and smaller vegetation.<sup>4</sup>

Unfortunately, PG&E's response to the Energy Safety's remedy to establish a detailed timeline and plan to incorporate EPSS enabled circuits into its Public Safety Power Shut-off (PSPS) decision-making is non-committal. By September 2024, PG&E indicates it *may* operationalize their decision-making to include EPSS enablement studies. This does not respond to concerns to minimize PSPS and set appropriate risk thresholds by capturing EPSS enabled circuits into PG&E's methodology.<sup>5</sup> PG&E's expectation that EPSS outages will decline 2% year over year was unsatisfactory before, and PG&E demonstrates little appetite for modest efforts that could reduce the scope and scale of potential PSPS outages in the future.

### **Vegetation Management and Inspections**

RCRC shares Energy Safety's assessment that rigorous hazard tree mitigation is essential to preventing outages and ignitions.<sup>6</sup> We appreciate PG&E's attempt to focus vegetation management on those circuits at greatest risk of EPSS outages, as a significant proportion of EPSS outages appear to be triggered by vegetation and so could possibly be avoided with proper pruning and vegetation management.

Again, RCRC reiterates our appreciation of PG&E's responsiveness to our concerns related to hazard trees and the efforts to follow-up with property owners, such as completing wood haul of felled hazard trees as requested by the customer. Hazard trees that are felled but not timely removed can become harmful fuel load in the event of a fire and transfer liability onto the property owner (impacting defensible space and homeowners' insurance policies). Wood haul is a crucial component of any successful

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<sup>4</sup> Animal contact and vegetation contact represented approximately 14% and 12% of EPSS outages in July 2023; however, those causes could be a much higher percentage of the total EPSS outages since such a high proportion of EPSS outages are due to "unknown" causes.

<sup>5</sup> Page 31, *Office of Energy Infrastructure Safety Issuance of Revision Notice for Pacific Gas and Electric Company's 2023-2025 Wildfire Mitigation Plan*, June 22, 2023.

<sup>6</sup> Page 20, *Office of Energy Infrastructure Safety Issuance of Revision Notice for Pacific Gas and Electric Company's 2023-2025 Wildfire Mitigation Plan*, June 22, 2023.

vegetation management activity, and such metrics should be expressly contained and scrutinized within wildfire mitigation plans.

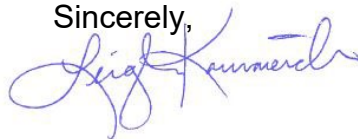
Based on recent (August 2023) customer experiences with PG&E's vegetation management program, failure to remove logs and trees continues to be of concern in certain communities. For example, before conducting tree work in Lake County, PG&E assured customers that PG&E would remove the hazard trees upon request; however, after completing the work, PG&E told those homeowners that opted into wood removal that PG&E now must determine whether the logs *qualify* for removal. This confusion has added to the uncertainty of how PG&E consistently manages its internal operations.

Lastly, counties have long provided PG&E leadership with suggestions to improve customer contact and engagement to benefit the relationship between the utility and its customers. Unfortunately, absent from PG&E's response to "Remedy f" to benchmark with Southern California Edison (SCE) and San Diego Gas and Electric (SDG&E) is any insight, discussion, or proposed changes to customer contact, best practices for contractor oversight, and wood haul/slash management. These are the foundations of numerous customer grievances and county concerns. PG&E has indicated to our organization that it has tried to improve many of those processes and quality control issues; however, these improvements do not appear to be reflected (or explained) in the WMP. Additionally, given the millions of strike trees in High Fire Threat Districts across PG&E's service territory, compared to the approximately 350,000 for SCE and 247,500 for SDG&E<sup>7</sup>, we also note the qualifications for PG&E's workforce to carry out tree work appear to have taken a step backward, especially in relation to benchmarking with SCE and SDG&E.<sup>8</sup> Again, these issues continue to disproportionately impact the safety and wellbeing of customers in PG&E's service territory in a very direct way.

## **Conclusion**

The ethos underpinning PG&E's WMP continues to be one of reactionary compliance and, unfortunately, is often not proactively strategic; thus, we thank Energy Safety for identifying critical issues and ordering PG&E to undergo substantial revisions to their base WMP. We appreciate your consideration of our comments and the opportunity to convey rural community impacts of PG&E's Revised 2023-2025 Wildfire Mitigation Plan. If you have any questions, please do not hesitate to contact me at (916) 447-4806 or [lkammerich@rcrcnet.org](mailto:lkammerich@rcrcnet.org).

Sincerely,



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<sup>7</sup> Page 102, PG&E Revision Notice Response, August 7, 2023.

<sup>8</sup> Page 96, PG&E Revision Notice Response, August 7, 2023.

Caroline Thomas Jacobs  
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LEIGH KAMMERICH  
Policy Advocate