



June 30, 2021

Ms. Marybel Batjer
President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Transmitted via email: Alex.Pineda@cpuc.ca.gov, Benjamin.Turner@cpuc.ca.gov and I.19-09-016 Service List

RE: Resolution M-4855

Dear President Batjer:

On behalf of the Rural County Representatives of California (RCRC), I write with respect to Resolution M-4855, *Approving and denying elements of Pacific Gas and Electric Company's (PG&E) Advice Letter 4401-G/6116-E Requests to Comply with Decision 20-05-053 to Implement an Independent Safety Monitor (ISM)*. RCRC is an association of thirty-seven rural California counties, and our Board of Directors is comprised of one elected county supervisor from each member county.

Establishing an ISM is a timely and necessary endeavor, especially considering PG&E's Federal Monitor will expire on January 26, 2022. Given PG&E is currently in the Commission's Enhanced Oversight and Enforcement Process, the ISM must incorporate the broader set of initiatives the Federal Monitor oversees at the outset, such as Wildfire Mitigation Plans (WMPs) and oversight of Public Safety Power Shut-offs (PSPS). Unfortunately, Resolution M-4855 currently falls flat in requiring a more comprehensive directive and total scope of work.

Resolution M-4855 must appropriately, and explicitly, recognize the need to evaluate PG&E's wildfire mitigation efforts, including maintenance issues such as vegetation management. Resolution M-4855 correctly notes the Federal Monitor's scope of work expanded over time to include wildfire preparedness; however, no equivalent order has been made for the ISM. Resolution M-4855 must be revised to include the Federal Monitor's current scope of work to ensure consistent, uninterrupted accountability of PG&E. TURN's Advice Letter protest correctly noted that PG&E provided no comparison of the ISM's scope of work to the Federal Monitor. Resolution M-4855 also

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fails to capture how the ISM will be “functionally equivalent” to the Federal Monitor and instead appears to narrow its focus.

As you may know, on April 20, 2021, RCRC expressed concern to the Commission regarding PG&E’s Wildfire Wood Management Program, which has left behind 150,000-200,000 felled trees in its recent post-wildfire clean-up efforts. Not only has PG&E’s poor execution stymied property owners from eligibility in public post-disaster debris removal programs or from offsetting these non-insured expenses through merchantable timber, these felled trees pose safety risks because the dead fuel could catch fire or inhibit wildfire response efforts. These situations warrant scrutiny, and remedies, from an ISM.

Further, Resolution M-4855 finds the ISM’s scope of work should complement, but not unnecessarily duplicate, the work of the Wildfire Safety Division’s successor entity, the Office of Energy Infrastructure Safety (OEIS). Given OEIS will be in its infancy and a memorandum of understanding with the Commission has yet to be formally executed, this could limit the overall effectiveness of the ISM. The Commission must be vigilant while overseeing utility risk reduction improvements.

Lastly, we urge the Commission to articulate public access for the output of the ISM and any substantial changes to its tasks. For example, Resolution M-4855 provides the Commission’s Executive Director discretion to revise the ISM’s scope of work; however, there is no guarantee that such decisions will be publicly available. Public safety and accountability cannot be achieved in a vacuum.

Thank you for your consideration of our comments. Please do not hesitate to contact me if you have questions or would like to discuss further at (916) 447-4806 or lkammerich@rcrcnet.org.

Sincerely,



LEIGH KAMMERICH
Regulatory Affairs Advocate

cc: Commissioner Martha Guzman Aceves, California Public Utilities Commission
Commissioner Clifford Rechtschaffen, California Public Utilities Commission
Commissioner Genevieve Shiroma, California Public Utilities Commission
Commissioner Darcie L. Houck, California Public Utilities Commission
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