



July 20, 2021

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

*Transmittal Via E-mail: R.18-12-005 Service List, R.18-10-007 Service List, and [wildfiresafety@cpuc.ca.gov](mailto:wildfiresafety@cpuc.ca.gov)*

**RE: Resolution M-4856**

Dear President Batjer:

On behalf of the Rural County Representatives of California (RCRC), I write with respect to Resolution M-4856, that *Ratifies the Executive Director's Letter to Pacific Gas and Electric Company (PG&E) Directing PG&E to Comply with Certain Requirements Pertaining to PG&E's Implementation of Tree Overstrike Criteria in its Public Safety Power Shutoff (PSPS) De-Energization Decision-Making*. 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.

RCRC commends the California Public Utilities Commission's (Commission) Executive Director for raising concerns with PG&E's tree overstrike criteria and setting expectations "to vigilantly mitigate the impacts" in rural counties.<sup>1</sup> RCRC supports Resolution M-4856 to ratify the Executive Director's letter and require additional data-driven criteria that would parse out PSPS events using tree overstrike criteria.

Rural counties and their residents have suffered greatly from wildfires and public safety efforts to avoid utility-caused wildfires by employing proactive de-energization events. As a foundational issue, we acknowledge the need for strategic and thoughtful implementation of PSPS events as a last resort and do not dispute the overwhelming need for utility vegetation management activities and the massive undertaking it entails. However, there should be rigorous and enforceable expectations for utilities to conduct PSPS, which in and of itself is not with risk or downstream public safety consequences to

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<sup>1</sup> Page 2, Executive Director Rachel Peterson Letter to PG&E Senior Vice President and Chief Risk Officer Sumeet Singh, dated June 28, 2021.

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communities. Resolution M-4856 correctly acknowledges that the additional impacts of tree overstrike criteria will primarily impact rural counties.<sup>2</sup> While Resolution M-4856 cites a threefold increase in the frequency and duration of PSPS events, we concur with the concerns raised by the Joint Local Governments that systemwide averages calculated by PG&E may have a minimizing effect on the true impacts affecting particular communities.<sup>3</sup>

The Commission should hold a future public workshop on the progress of PG&E's system hardening and enhanced vegetation management activities in high-fire hazard severity zones that overlap in areas with tree overstrike criteria in order to evaluate meaningful progress on holistic wildfire mitigation efforts. In addition to the tree overstrike criteria being included in 2021 post-event reports, as well as PG&E's 2021 Post-Season PSPS report, the Commission should consider including tree overstrike criteria in PG&E's 2022 Pre-Season PSPS report in the event tree overstrike criteria does not get cancelled after this calendar year. Overreliance on de-energization events, especially those coupled with the addition of tree overstrike criteria, cannot become an acceptable long-term reality.

Again, we appreciate the attention of the Commission to set clear and enforceable expectations to protect rural communities in PG&E's service territory that are at-risk of broader, longer, and more frequent de-energizations as a result additional tree overstrike criterion. 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](mailto: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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<sup>2</sup> Page 3, Resolution M-4856.

<sup>3</sup> Page 2, *Joint Local Governments' Comments on PG&E Tree Overstrike Workshop Presentation*, dated April 27, 2021.