



August 17, 2021

Commissioner Martha Guzman Aceves
Commissioner Darcie Houck
Commissioner Clifford Rechtschaffen
Commissioner Genevieve Shiroma
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

RE: Reinstatement of PG&E's Wildfire Wood Management Program

Dear President Batjer and Honorable Commissioners:

The undersigned Senators and Assemblymembers represent Sonoma, and Napa counties as well as the City of Santa Rosa. We have been made aware of serious safety concerns raised by our constituents regarding the safety and fire hazards created by PG&E during its system restoration after the 2020 wildfires in Northern California.

PG&E's system restoration included cutting down between 150k-200k trees, leaving the majority of trees in place where they fell. This new volume of felled wood in the wildland urban interface, including the high and very high fire severity zones also created new safety hazards, prevented fire survivors from clearing their properties and beginning the process of rebuilding, imposed significant burdens on the impacted local governments, as well as imposed significant financial obligations on both individual residents and the communities in which they reside.

PG&E created a Wildfire Wood Management Program following the 2017 wildfires to address these same safety and fire risks, and had it remained in place the logistical and financial burdens communities now face following the 2020 wildfires, would have been alleviated. PG&E abruptly canceled that program despite its continuous tree cutting activities. [We note that PG&E separately and currently continues to remove and dispose of the trees it cuts down as part of its Enhanced Vegetation Management program and its program to remove drought- and beetle-killed trees.] While PG&E offered to remove some of the almost 200,000 trees it cut down in fall/winter 2020-21, its offer was conditioned on the local governments' ability to share significant responsibility for removing and disposing of the felled trees.

PG&E has recently announced a 2020 Wildfire Wood Hauling Program to its impacted customers that it will remove the trees cut down in 2020 which were left on public and private property, subject to a very significant number of limitations. Unfortunately, PG&E launched this offer without any advance notice to all of the impacted local governments nor did PG&E share information about PG&E's plans for removal and disposal of the felled trees. Moreover, PG&E has set an arbitrary deadline of August 24, 2021, for property owners to enroll in the program. The program is limited to trees felled in response to the 2020 wildfires that PG&E, on its own determination, deems safe to remove, and PG&E expressly disclaims any obligation to remove trees it cuts down during system restoration after wildfires in future years.

It is concerning that it took PG&E the better part of a year to make this limited and conditional offer, and it only did so after significant push-back from impacted customers and communities. Large swaths of felled trees are located on property not owned PG&E "customers." PG&E has not responded to local governments' request to be apprised of all impacted property owners; it is not clear that all affected property owners have been apprised of the offer and the August 24 deadline.

It is also concerning that PG&E has not shown willingness to remove and dispose of the trees it cuts down during system restoration as a permanent best practice. Leaving large numbers of felled trees on the ground to dry out and rot is a safety and fire hazard, which interestingly, PG&E has publicly acknowledged.

Our understanding is the CPUC has been aware of this problem since December of 2020, and we find it troubling that you have not taken any action to address PG&E's tree removal practices. The CPUC has broad authority under Public Utilities Code section 701, and the regulatory and ratemaking mechanisms under which PG&E can be ordered to permanently remove and dispose of the trees it cuts down during post-disaster system restoration already exist.

You are likely aware that the Office of Energy Infrastructure Safety recently issued a Draft Action Statement on PG&E's 2021 Wildfire Mitigation Plan Update that agrees with the Joint Local Governments' concerns that PG&E's vegetation management and post-fire restoration activities are creating large amounts of biomass residue. OEIS directs PG&E to discuss its plan and execution of fuel management activities that reduce the availability of fuel in proximity to potential sources of ignition, including "slash" from vegetation management activities, in the utility's 2022 Wildfire Mitigation Plan update. While OEIS' awareness of the safety and fire hazards created by PG&E's tree-cutting activities is encouraging, the proposed remedy does not address the hazards PG&E created during its post-fire system restoration in 2020, nor does it address the same safety and fire hazards that will occur after future disasters.

We urge the CPUC to issue an order within 30 days directing PG&E to permanently reinstate its practice of removing and disposing of all trees it fells during post-fire system restoration work, inclusive of the trees it cut down following the 2020 wildfires. If the CPUC will not issue such an order, we request a written explanation within 30 days of the

CPUC's decision not to address the fire and safety hazards created by PG&E's post-fire system restoration work.

Sincerely,



BILL DODD
Senator, 3rd Senate District



MIKE MCGUIRE
Senator, 2nd Senate District



CECILIA AGUIAR-CURRY
Assemblymember, 4th Assembly District



JIM WOOD
Assemblymember, 2nd Assembly District

cc: Caroline Thomas Jacobs, Director, Office of Energy Infrastructure Safety
Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Rachel Peterson, Executive Director, CPUC