

September 7, 2021

Rachel Peterson  
Executive Director  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

Dear Executive Director Peterson:

PG&E welcomes your August 24, 2021 letter regarding the hauling of wood from properties where PG&E felled fire-damaged trees that posed hazards to electric facilities and crews during PG&E's restoration efforts after the 2020 wildfires. Prior to receipt of your letter, PG&E initiated efforts to haul this wood in sixteen counties in California. We believe this overall situation needs a coordinated, regulated response so that the both safety and customer needs are addressed in a fair, proactive, and productive way for the benefit of all. We are eager to share with you the details of PG&E's 2020 Wildfire Tree Hauling Program (Program) that is already underway.

Our response to your letter includes:

- 1) an overview of the Program;
- 2) a description of PG&E's community outreach and communications about the Program to county and local governments, tribes, customers, and landowners;
- 3) a description of PG&E's coordination with Cal OES' debris management program;
- 4) various considerations for potential commercial use of felled trees hauled away;
- 5) our plan for safe execution of the Program, in compliance with local permits and rules; and
- 6) a description of PG&E's anticipated 2021 Wildfire Tree Hauling Program.

1) **PG&E's 2020 Wildfire Tree Hauling Program**

**Background**

The unprecedented wildfires of 2020 devastated many communities in PG&E's service territory. After the 2020 wildfires, we worked quickly and safely to restore power to our customers. This work included inspecting and cutting down fire-damaged hazardous trees that posed a potential safety risk to work crews or to the electric equipment. This work was done in coordination with Cal FIRE and other agencies in response to the wildfires. After cutting these hazardous trees, crews chipped tree parts that were less than four inches in diameter and spread the chips on-site, where possible. Because trees are considered the property of the landowner, any logs larger than four inches in diameter remained at the property for the landowner.

Because PG&E believes it has a role to play beyond simply restoring service after a wildfire, earlier this year, PG&E made a commitment to assist in the post-wildfire recovery process for all

communities in our service territory by offering to haul away wood that PG&E cut in response to the 2020 wildfires. The Program encompasses trees that PG&E cut in sixteen separate counties in response to the August Complex Fire, Creek Fire, CZU Lightning Complex Fire, Glass Fire, LNU Lightning Complex Fire, North Complex Fire, Oak Fire, SCU Lightning Complex Fire, Willow Fire and Zogg Fire.

We have been listening to landowners and communities and recognize that these logs left on their property can be an additional burden to those who are already experiencing hardship and trying to clean up or rebuild. In response to this feedback, we have begun returning to private property where PG&E cut down trees following the 2020 wildfires and offering to dispose of the large-diameter wood.

## **Permits and Process**

To conduct this important wood hauling work, we issued a Request for Proposal (RFP) in July and awarded contracts to multiple vendors for each of the impacted 2020 fire footprint areas. As part of setting up the Program, PG&E obtains any necessary permits, including encroachment permits. The Program is proceeding in two phases.

Phase One of the Program has focused on expediting removal of wood that is readily accessible and does not require additional permitting, risk environmental degradation, or involve safety challenges or obstacles for crews. As we complete Phase One and as resources become available, we will turn to removal of wood involving more challenging circumstances. For example, some felled trees may be resting in locations that will require more planning to develop an appropriate hauling plan and that may require additional permits. Wood located on state or governmental properties and in areas that are environmentally sensitive will likely require careful planning and may require additional permitting to allow machinery or vehicles to assist in removing and hauling felled trees. Phase Two, will address these constraints. We are committed to completing tree hauling from 2020 fire footprints as safely and quickly as we can and will continue to work with landowners to determine the best and safest path forward.

## **Program Details**

PG&E's first step in implementing Phase One of the Program has been to perform site visits to inventory wood debris for the Program and to communicate with landowners and counties where the 2020 wildfires took place. After obtaining executed authorization forms, PG&E performs an environmental review and prescribes necessary best management practices (BMPs) to complete the work. Program coordinators then coordinate and sends crews to each site. In instances where there are known environmentally sensitive areas within or adjacent to the work area, an environmental monitor accompanies the crews to ensure environmental compliance during removal operations.

Two viable options exist for removing wood debris: 1) chipping and broadcasting on-site or 2) hauling off property. With specialized chipping equipment, material as large as 28 inches in diameter can be chipped and broadcast. However, limitations exist for chipping, mainly due to the size of parcel and access. If chipping on-site is not utilized then the wood is hauled off property. The wood hauled off property currently goes to nine active regional locations that have been set up to accommodate wood management requirements. At the wood delivery locations, the wood material is processed mainly into chip grindings. The chip grindings are delivered to end-use facilities throughout California, which currently includes seven biomass-fueled electric

generation facilities and one landfill that compost the material for landscaping. Additional outlets for material, often times smaller scale, are targeted within local communities near the wood delivery locations that include small mills, firewood operations, local community chip/firewood donations.

PG&E has assigned vendors to haul the wood for all of the 2020 wildfires. Crew size and equipment type varies by fire location, but the typical crew usually includes a grapple truck, skid steer and four personnel. Vendors selected are PG&E approved and are encouraged to hire locally.

## 2) **Communication and Collaboration with impacted Counties, Local Governments, Tribes, Customers, and Landowners**

### **County Outreach**

PG&E provided advance notice of the Program and has been carefully coordinating with the counties impacted by the 2020 wildfires. PG&E reached out to the counties directly on the following dates, notifying them of upcoming inventory work, and providing information about the Program.<sup>1/</sup>

- Napa County on June 22, 2021
- Fresno County on June 24, 2021
- Sonoma and Trinity Counties on June 25, 2021
- Butte, Lake, Mendocino, Santa Cruz, Solano, Yolo, and Yuba Counties on June 28, 2021
- Santa Clara and San Mateo Counties on June 29, 2021
- Shasta County on June 30, 2021

In July and August, PG&E provided several updates on our wood removal efforts to Fresno, Sonoma, Lake, Napa, Butte, Madera, Mendocino, San Mateo, Santa Clara, Shasta, Trinity, Solano, Yuba, and Stanislaus counties via email communication and phone calls. The communications included requests to promote the Program with impacted County residents and remind them of the opt-in deadline.<sup>2/</sup>

Additionally, PG&E engaged with local media in the areas impacted by the 2020 wildfires. In late July, PG&E issued local media releases notifying roughly 60 outlets across our service area of the program.<sup>3/</sup> This media coverage secured more than 30 media stories, for which we have attached a coverage report.<sup>4/</sup>

We have meetings scheduled with several counties to discuss the details of the program, including with local fire and forestry representatives.

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<sup>1/</sup> See Attachment A.

<sup>2/</sup> See Attachment B.

<sup>3/</sup> See Attachment C.

<sup>4/</sup> See Attachment D.

PG&E has been in communication with counties to advise them of Program milestones, such as the planned inventory schedule and planned removal and hauling schedules. In response to inquiries, we also have provided county specific data, including the number of properties inventoried, the number of permission forms received, etc. In addition, PG&E has been in regular communication with several counties responding to inquiries about Program details and customer questions.

Moving forward, we will be expanding our wood management efforts to include agency lands such as state parks, tribal lands, and other public lands (Phase 2). As we have been throughout this work, we will continue to communicate early and often, be transparent in responding to all customer and agency inquiries and partner to ensure all stakeholders are properly informed.

## Customer and Landowner Outreach

PG&E has taken significant steps to communicate to customers and landowners about the availability of the Program. PG&E conducted multiple outreach campaigns to customers and non-customer landowners impacted by fires. Letters, door hangers and interactive voice messages were delivered to impacted property owners beginning in July,<sup>5/</sup> including:

- **Nearly 6,400 letters** sent to customers informing them of the Program<sup>6/</sup> to haul away eligible 2020 wildfire wood on their property and non-customer landowners. PG&E's letters informed landowners that the wood on their property was eligible for hauling and invited landowners to opt-in to the Program by returning an executed authorization form to PG&E no later than August 24, 2021.<sup>7/</sup>

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<sup>5/</sup> Although PG&E discussed with the County of Santa Cruz their concerns about PG&E's response to the CZU Lightning Complex Fire, just like we did with other counties and stakeholders, the County of Santa Cruz chose to litigate in the end. CZU Lightning Complex Fire landowners have therefore not been included in our initial outreach due to this pending complaint proceeding filed at the Commission alleging violations related to PG&E's emergency response efforts to the CZU Lightning Complex Fire. PG&E will begin initiating landowner calls on September 9<sup>th</sup> in the Santa Cruz footprint of the CZU Lightning Complex Fire via interactive voice responses to notify landowners that inventorying the wood in Santa Cruz County will begin later this week. PG&E is asking that landowners in the CZU Lightning Fire Complex footprint provide to PG&E by October 31, 2021, their executed permission forms to haul their wood. However, the County of Santa Cruz has yet to identify to PG&E any specific locations, properties, trees, and wood that form the basis of the County's allegations. Hauling away the wood in the midst of this dispute could impact the Commission's ability to determine if any violations have occurred. Therefore, after the County identifies specific landowners, addresses, or any other information about the trees and wood upon which the County bases its allegations, PG&E will begin hauling wood eligible for the Program for customers outside the scope of the County's allegations. Additionally, the California Coastal Commission issued an Notice of Violation against PG&E based on the same response to the CZU Lightning Complex Fire (NOV #V-3-20-0089), but also has not yet provided details to PG&E of the specific locations of trees that form the basis of its allegations.

<sup>6/</sup> See Attachment E for an example of a letter.

<sup>7/</sup> See Attachment F for an example of the authorization form. As described below, the deadline has since been extended to September 14 to allow additional landowners to participate.

- On June 22, prior to beginning its work, PG&E began outreach efforts via phone conversations. On June 28, PG&E initiated more than **4,400 telephone calls** relying upon interactive voice responses to phone numbers of impacted landowners to notify them of upcoming inventory work.<sup>8/</sup>
- We began our inventory work on June 28, 2021 in the Glass Fire footprint. Subsequent inventory began on the dates below for the following fire footprints:
  - August Complex Fire: July 15, 2021
  - Creek Fire: June 28, 2021
  - CZU Lightning Complex Fire: Week of September 6, 2021
  - LNU Lightning Complex Fire: July 6, 2021
  - Glass Fire: June 28, 2021
  - North Complex Fire: July 19, 2021
  - Oak Fire: July 10, 2021
  - SCU Lightning Complex Fire: July 10, 2021
  - Willow Fire: July 10, 2021
  - Zogg Fire: July 17, 2021
- As part of this inventory process, PG&E crews delivered or left **nearly 5,000 doorhangers** at private properties.<sup>9/</sup> The estimated distribution of doorhangers by county:
  - Butte County: 1,850
  - Fresno County: 960
  - Lake County: 10
  - Mendocino County: 5
  - Napa County: 800
  - Santa Clara County: 50
  - Shasta County: 200
  - Solano County: 300
  - Sonoma County: 600
  - Stanislaus County: 2
  - Trinity County: 120
  - Yolo County: 10
  - Yuba County: 30

As of the date of this letter, PG&E has started hauling off wood from parcels in Butte, Napa, Shasta, Solano, and Sonoma counties. See Attachment I for the latest data for each county. Beginning September 2, 2021, PG&E shared this data with each of the counties, and will continue to share on a weekly basis. Table 1, below, shows hauling start dates by fire and county.

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<sup>8/</sup> See Attachment G for the text of the interactive voice response delivered to landowners.

<sup>9/</sup> See Attachment H for a copy of the doorhanger provided.

**Table 1**

<b>Fire</b>	<b>County</b>	<b>Hauling Start Date</b>
August	Trinity	9/20/2021
Creek	Fresno, Madera	9/10/2021
CZU	San Mateo	9/27/2021
CZU	Santa Cruz	On Hold Pending Litigation
Glass	Napa, Sonoma	In Progress
LNU	Napa, Sonoma, Lake, Solano, Yolo	In Progress
North Complex	Butte	In Progress
Oak	Mendocino	9/13/2021
SCU	Santa Clara, Stanislaus	9/20/2021
Willow	Yuba	9/20/2021
Zogg	Shasta	In Progress

As mentioned above, PG&E has been in regular contact with the media about the program, beginning with the initial press releases issued the week of July 26<sup>th</sup>. On August 12, 2021, PG&E issued a press release to seven outlets in Butte County publicizing the program in the area of the North Complex Fire.<sup>10/</sup> This engagement was conducted slightly later than other fire footprints due to the ongoing Dixie Fire. Another press release was issued on August 16, 2021, to media outlets in the other fire footprint areas informing them of the August 24 deadline.<sup>11/</sup> In early September, PG&E issued a fourth local media release, announcing that the program’s opt in deadline had been extended to Sept. 14<sup>th</sup>.

With the intention of ensuring that all landowners were informed and given the opportunity to participate in the Program, PG&E recently extended the opt-in deadline by three weeks, to September 14, 2021. In furtherance of that effort, PG&E mailed **approximately 5,500 letters** on August 20 to landowners notifying them of the extension. PG&E also issued a press release on Monday, August 30 to promote the extended deadline.<sup>12/</sup>

Throughout the course of communicating to landowners about the details of the Program, we have engaged in an average of three to five phone calls per property owner in an effort to ensure awareness of the Program and to encourage landowners to participate.

**3) Coordination with Cal OES**

PG&E is participating in a monthly coordination call with the California Governor’s Office of Emergency Services (Cal OES) to align on our efforts and raise any questions, concerns, or opportunities. Our regional representatives also connect regularly with Cal OES representatives to promptly address any questions or issues as they arise.

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<sup>10/</sup> See Attachment J.

<sup>11/</sup> See Attachment K.

<sup>12/</sup> See Attachment L.

As this series of meetings began, they were focused on avoiding conflicts in the field. Each organization ensured that regional and other field staff had the proper contact, and communications were improved immediately. Since then, the monthly meetings serve as an opportunity to discuss new issues as they are identified so that they may be quickly resolved.

#### **4) Considerations for Commercial Use of Felled Trees Hauled Away**

As part of this Program, we will continue working with third-party facilities and vendors who can accept, store, utilize or dispose of this wood debris in a timely, compliant, and efficient manner. We have also been in communication with the California Natural Resources Agency which has put us in touch with several vendors to support our wood removal efforts.

As previously mentioned, we have partnered with seven biomass generators to deliver wood chips for use as fuel in their facilities. Electric generation from biomass facilities is firm, Renewable Portfolio Standard (RPS)-eligible and contributes to the electric reliability of the grid.

Lastly, we piloted air curtain burners as part of our wood management work in connection with the North Complex Fire in 2020. For site-specific operations, PG&E will consider air curtain burners as a solution for wood disposal. We're glad to partner with third parties who can realize the value of this wood debris.

#### **5) Safe, Compliant, and Timely Execution of the Program**

We have completed environmental reviews and have an environmental monitor onsite in all noted sensitive areas. These monitors support active operations and contribute to pre- and post-work reviews.

PG&E verifies all vendor safety records, skills and other requirements to perform this work. We have no recorded worker injuries associated with implementation of the Program. Vendor and community safety is one of the reasons why if a log/tree is located in an area or in a manner that will increase the safety risk for the workers or to members of the community, we may choose to leave the tree where it is, until it can be safely extricated.

To ensure timely execution of this work, PG&E stood up a cross-functional team of dedicated resources to complete this work. This effort includes dedicated project managers participating in daily meetings to review the effort. PG&E works with specific and local vendors to properly distribute this work and ensure it is completed on time.

#### **6) Plans for 2021 Wildfire Wood Hauling Program**

In addition to the 2020 Wildfire Tree Hauling Program that is underway, PG&E plans to apply the 2020 Wildfire Tree Hauling Program to the 2021 wildfires on a rolling basis when it is safe to do so and as resources allow.

PG&E has communicated with branch chiefs assigned to each fire and we are working to stage wood in an operationally efficient manner to facilitate hauling. We have begun the process of getting landowner permission on one 2021 wildfire so far and will begin this for the remaining footprints soon. PG&E is always looking to partner with local or regional organizations that meet the pre-qualification criteria established by PG&E as part of our enterprise Contractor Safety Program. Additionally, PG&E will be coordinating with CalOES on the 2021 Wildfire Wood Hauling efforts.

We are pleased with the progress we've made and the support we're providing to landowners and are looking forward to finalizing our plan for 2021 fire footprint areas. We are also appreciative for the CPUC's continued commitment to helping support PG&E customers and communities.

Sincerely,



Sumeet Singh  
SVP & Chief Risk Officer

CC: President Marybel Batjer, CPUC  
Commissioner Martha Guzman Aceves, CPUC Commissioner Clifford Rechtschaffen,  
CPUC Commissioner Genevieve Shiroma, CPUC Commissioner Darcie L. Houck,  
CPUC

Service list of Rulemaking 18-10-007, Order Instituting Rulemaking to Implement  
Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018).

Caroline Thomas Jacobs, Director Office of Energy Infrastructure Safety

Thom Porter, Director and Fire Chief  
California Department of Forestry and Fire Protection

Mark Ghilarducci, Director  
California Governor's Office of Emergency Services