

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

Rulemaking 18-10-007
(Filed October 25, 2018)

NOTICE OF EX PARTE MEETINGS

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and the City of Santa Rosa

Dated: January 15, 2021

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

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NOTICE OF EX PARTE MEETINGS

In accordance with Rule 8.4 of the Commission's Rules of Practice and Procedure, the Counties of Napa and Sonoma and the City of Santa Rosa (the Joint Local Governments) submit this notice of ex parte meetings in the above-captioned proceeding.

The first meeting took place via teleconference on January 15, 2021, with Shannon O'Rourke, Chief of Staff to President Batjer, at the Joint Local Governments' request. The meeting started at 9:30 a.m. and lasted approximately 30 minutes. The attendees were Diane Dillon, District Three Supervisor, Napa County; Thomas Zeleny, Chief Deputy County Counsel, Napa County; and Megan Somogyi, outside counsel. The materials in Attachment A were used during the meeting; Ms. Somogyi emailed the materials to Ms. O'Rourke at the start of the meeting.

Ms. Somogyi discussed the Joint Local Governments' request that the Commission order PG&E to reinstate its practice of removing trees that it cuts down during its post-wildfire restoration and safety work and noted that PG&E currently removes trees that it cuts down under several other vegetation management and wildfire-related programs. PG&E's 2018 CEMA testimony, excerpted in the meeting materials, describes PG&E's tree removal

practices for drought- and beetle-killed trees; in that testimony, PG&E states that leaving the felled logs on the ground creates safety hazards for PG&E crews and the landowner, creates fire hazards, and compromises firefighter safety. PG&E knows that leaving felled trees on the ground causes safety and fire risks. Despite knowing this, and despite addressing those same risks by removing trees under other vegetation and safety programs, PG&E arbitrarily decided in October 2020 to stop removing the trees that it cuts down as part of its system restoration activities in wildfire-impacted areas. PG&E is therefore knowingly creating safety risks for its customers, which is a violation of its obligation to provide safe and reliable service.

Ms. Somogyi discussed PG&E's response to the Joint Local Governments' concerns, in which PG&E focuses on the need to share responsibility between itself and local governments for removing this specific subset of the trees PG&E cuts down. PG&E is wrong. PG&E's response letters to the local governments state that PG&E is cutting these trees down as part of its post-wildfire system restoration work; the responsibility for doing that work is entirely PG&E's. Because PG&E is cutting down these trees as part of that work, PG&E is responsible for removing the trees if the landowner requests it—just like PG&E currently removes trees at the landowner's request for drought-impacted trees and under its Enhanced Vegetation Management program. PG&E's EVM tree removal request form is included in the meeting materials. Ms. Somogyi also noted that, because there is no question that PG&E is responsible for abating fire and safety hazards it creates in its service territory, the costs of removing this subset of felled trees can be recorded in PG&E's CEMA or other wildfire-related memorandum accounts. The Joint Local Governments understand that the costs, if approved by the Commission, will be paid by PG&E's customers, but the fact remains that PG&E incurs those costs as part of its obligation to provide safe and reliable service. Moreover, any costs for post-

fire tree removal would be amortized into rates in a future proceeding, just like the costs for the trees PG&E is currently removing under its other vegetation management programs. Simply put, there is no legal, regulatory, or policy reason that prevents PG&E from removing the trees it cuts down during its post-fire restoration work, just like it removes other trees that it cuts down. There are however, legal, regulatory, and policy reasons that support ordering PG&E to reinstate its post-fire tree removal program, and the on-the-ground impact of PG&E's about-face decision to stop removing the fire-impacted trees it cuts down are staggering for the impacted communities.

Supervisor Dillon described the hundreds of properties in Napa County impacted by PG&E's post-fire tree cutting in the aftermath of the Glass Fire. Because PG&E removed the trees it cut down following the 2017 wildfires, Napa County did not experience the same problems as it is currently facing. About a week after the Glass Fire was extinguished, the County began receiving calls and emails from residents who had PG&E-felled trees lying haphazardly all over their properties, some of which trees had damaged infrastructure on the property. The President of one of California's professional logging associations visited some County properties and observed that PG&E is not cutting the trees into salvageable lengths, which prevents PG&E or the landowners from offsetting the costs of removing the logs by selling them. While PG&E was fairly responsive to the County's reports of property damage caused by felled trees, PG&E has consistently claimed that it cannot remove the trees it cuts down because this is an emergency situation. In late 2020, PG&E attended a Board of Supervisors meeting, at the Board's request, to discuss its post-fire restoration and tree removal activities; PG&E stated that it had 60 crews working all over Napa County and reiterated its view that, because this is an emergency situation, PG&E would not remove the trees it cut down.

Supervisor Dillon observed that the County knows PG&E has the capabilities to remove the trees it cuts down, as it does so under other vegetation management programs and has done so in fire-impacted areas in the past, and stressed that PG&E is creating significant future fire hazards and logistical impediments for firefighters. Supervisor Dillon also noted that, while PG&E's letter purporting to respond to the County's concerns states that PG&E is cutting trees down to allow power restoration, power has been restored for months now and PG&E's crews are still cutting down fire-impacted trees and leaving them on the ground in a haphazard manner. The costs to individual property owners to remove the trees PG&E leaves behind are significant, and many property owners cannot afford it.

Finally, Ms. Somogyi discussed the Joint Local Governments' plans to address these issues directly with the Safety and Enforcement Division, given the serious safety and fire hazards PG&E is creating.

The second meeting took place via teleconference on January 15, 2021, with Shannon O'Rourke, Chief of Staff to President Batjer, at the local governments' request. The meeting started at 1:30 p.m. and lasted approximately 30 minutes. The attendees were: Chris Rogers, Mayor, City of Santa Rosa; Sue Gallagher, Santa Rosa City Attorney; Adam Abel, Assistant City Attorney; Sean McGlynn, Santa Rosa City Manager; Paul Lowenthal, Assistant Fire Marshal, City of Santa Rosa; Scott Westrope, Interim Fire Chief, City of Santa Rosa; Adriane Mertens, Chief Communications and Intergovernmental Officer; Cory O'Donnell, Chief Deputy County Counsel, Sonoma County; Petra Bruggisser, Deputy County Counsel; Lois Hopkins, Sonoma County Office of Recovery and Resiliency; Marissa Montenegro, Sonoma County Administrator's Office; and Megan Somogyi, outside counsel. The materials in Attachment A were referenced during the meeting.

At the start of the meeting, Ms. Somogyi reiterated the request for Commission action and underlying justifications that she provided in the first meeting.

Mr. Westrope described the impacts of the wildfires that have affected Santa Rosa and Sonoma since 2017, including acreage and structures destroyed and lives lost. The extent of the impacts of these fires provides context for, and emphasizes the gravity of, the situation PG&E is creating. The City and County need the Commission to help ease some of the burden on the community.

Mr. Lowenthal provided the history of the City and County's post-fire debris management and coordination with PG&E. After the 2017 wildfires, the City and County formed a debris taskforce to address the fallout from the historic fires, and PG&E was one of the first partners, along with the State, in that effort. The task force worked closely with PG&E as it implemented its first post-fire wood removal program, which was critical for the City and County; the program was so successful and so necessary that PG&E extended it beyond the scope originally envisioned. After the Camp Fire, the task force members provided knowledge, assistance, and lessons learned from the 2017 fire cleanup to PG&E and Butte County as PG&E removed trees it cut down in the aftermath of the Camp Fire. The City and County formed the debris task force again in 2020 and invited PG&E to join, as it had previously; while PG&E sent a local government liaison to the task force meetings, it was clear that PG&E's stance on debris removal had changed. One of the first issues the task force raised with PG&E was the tree removal program, whereupon PG&E made it clear that there would be no tree removal (wood management) program anymore. The City and County raised their concerns over the course of a months about safety and fire hazards created by PG&E leaving felled trees on the ground, and PG&E eventually offered to hold an offline discussion, outside the debris task force, to discuss

the issues it was creating. The meeting was convened immediately and was also attended by CalOES's Inland Branch Director and Intergovernmental Relations Representative. During the meeting, PG&E reiterated its position that it would no longer remove the trees it cut down. PG&E also apparently was aware of other counties experiencing the same problems as Santa Rosa and Sonoma.

The meeting also addressed the state's hazard tree removal program and the fact that PG&E's post-fire tree removal practices were, in some cases, interfering with the state program and ultimately depriving residents of the ability to take advantage of a program funded by their taxes. While PG&E expressed willingness to work with the state in the future to avoid conflict between the state's tree removal program and PG&E's post-fire system restoration activities, PG&E was unwilling to address the problems it was creating in the present. A PG&E representative observed during the meeting that either the ratepayers or the taxpayers would shoulder the costs of removing fire-damaged trees.

Mr. Lowenthal also described PG&E's commitment in 2017 to remove the trees it cut down during system restoration work, which PG&E stated expressly was due to the risk created by leaving cut trees on the ground. When the City and County asked PG&E about when and why its stance changed on abating the risk created by trees it cuts down, PG&E did not provide a straight answer.

Mr. Lowenthal noted that, not only does PG&E's newfound refusal to remove the trees it cuts down during system restoration work conflict with the state's tree removal program, but in many cases it conflicts with individuals' homeowners' insurance. When PG&E cuts down trees, the trees no longer pose a hazard and insurance companies calculate the benefits differently. PG&E is also cutting the trees into relatively short lengths, which means they cannot

be sold to offset some of the costs of removing them. PG&E is cutting the trees in such a way that there is no value left in them, and many property owners cannot afford to have the tree debris removed.

Finally, Mr. Lowenthal stated that PG&E is creating significant hurdles for the City and County while they are in the midst of implementing new wildfire safety plans. All of a sudden, the City and County must contend with thousands of huge logs—all of which are new fire and safety hazards—as they plan for how best to keep their residents safe. PG&E is apparently planning to remove another 5,000 or so trees in the City and/or County in the near future, which is an alarming prospect for the local governments.

Ms. Hopkins stated that the County's concerns are the same as the City's, and noted that the County receives multiple calls each week from property owners who now have a lot full of massive logs left by PG&E and very few options for removing them.

Respectfully submitted January 15, 2021, at San Francisco, California.

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By: /s/ Megan Somogyi

Megan Somogyi

Attorneys for Counties of Napa and
Sonoma and the City of Santa Rosa

ATTACHMENT A

**EXCERPT FROM PG&E SUPPORTING TESTIMONY
FOR ITS 2018 CEMA APPLICATION (A.18-03-015)**

Application: 18-03-015
U-39E
Exhibit No.: _____
Date: August 7, 2019
Witness(es): Various

PACIFIC GAS AND ELECTRIC COMPANY
2018 CATASTROPHIC EVENT MEMORANDUM ACCOUNT
REVISED TESTIMONY
(CLEAN VERSION)



1 due to the varying costs to abate dead and dying trees. PG&E
2 EDVM performed the analysis to adjust for the GRC baseline
3 portion of costs. E.g. factoring in the 33,000-tree dollar-
4 equivalent of approximately \$12 million to determine the
5 incremental CEMA costs/work.

6 Contributing to the challenge is that abating hazardous,
7 dead trees on a landscape level where high proportions of trees
8 are dead (as opposed to individual trees spread over the
9 landscape) requires specialized equipment, highly skilled crews,
10 and extraordinary effort. The work involved wholesale felling of
11 trees that were quite large (up to 6 feet in diameter and 200 feet
12 tall) and close to other trees and/or human infrastructure.

13 The numbers above and the work undertaken represent an
14 extraordinary situation in the field that has persisted for several
15 years. It can simply be described as a level of work an order of
16 magnitude above PG&E's routine work. PG&E EDVM had to
17 take significant steps to manage the work above and beyond its
18 routine program scope.

19 **2) Wood Management**

20 **a) Nature of Work**

21 Wood management became necessary because the
22 number and size of drought-killed or beetle-killed trees has been
23 so large that logs left behind on properties precluded the safe
24 conduct of work on other trees and the safe use of the
25 properties by the owners. In addition, the dead wood
26 constitutes fuel on the ground that not only can catch fire, but
27 also compromises firefighter safety.⁵⁷ This wood removal
28 activity applies to logs remaining after PG&E has severed the
29 dead and dying hazardous trees near the affected property.

57 Jain, et al., A Comprehensive Guide to Fuel Management Practices for Dry Mixed Conifer Forests in the Northwestern United States, General Technical Report RMRS-GTR-292, USDA, Forest Service, p. 42, October 2012.
<https://www.fs.fed.us/rm/pubs/rmrs_gtr292.pdf> (as of December 13, 2017).

1 To address these safety issues, PG&E began its Wood
2 Management Program in July 2016. By the time PG&E EDVM
3 had completed 2017 work in February 2018, wood management
4 had been conducted on about 8,200 properties, removing wood
5 representing about 77,000 trees, and delivering about
6 179,000 tons of biomass or logs to local end-users. For 2018
7 work completed in February 2019, wood management had been
8 conducted on about 2,400 properties, removing wood
9 representing about 9,900 trees, and delivering about 9,800 tons
10 of biomass or logs to local end-users.

11 PG&E spent approximately \$24.1 million performing this
12 work in 2016, \$33.2 million in 2017, and \$6.3 million in 2018.
13 The volume of wood management decreased in 2018, as
14 compared to previous years, because the number of tree deaths
15 decreased comparatively in 2018. Also, PG&E narrowed its
16 scope of work to focus only on wood closest to roads and
17 buildings, and other parties (such as property owners, counties,
18 and/or municipalities) began undertaking more wood
19 management work themselves.

20 PG&E disposes of the wood in various ways. In compliance
21 with the Governor's proclamation requiring a biomass energy
22 solution to the mortality crisis,⁵⁸ PG&E entered into an
23 agreement with Sierra Pacific Industries (SPI), a forest products
24 company with biomass generation capacity at its facilities. The
25 agreement allows for PG&E to deliver biomass fuels to SPI
26 facilities in exchange for a reduced price for the electricity sold
27 back to PG&E. PG&E immediately set up processing facilities
28 close to SPI facilities in Tuolumne County and began delivering
29 biomass fuel. PG&E also delivers biomass materials to other
30 facilities, including IHI Rio Bravo facilities in Fresno, Tuolumne,
31 and Placer Counties; and delivers logs to sawmills, pressboard

58 Governor's Proclamation of a State of Emergency, Order 11, October 30, 2015.
Chapter 1, Attachment F.

1 facilities, and export facilities. Lastly, and on a very limited
2 scale, PG&E has also provided wood to local artisans on a
3 case-by-case basis.

4 Figure 3-7 is an image of the wood left behind after tree
5 abatement work that has been cleaned up under the program.

FIGURE 3-7
EXAMPLE OF WOOD MANAGEMENT WORK – MADERA COUNTY
JULY 2016



6 **b) Incrementality**

7 During the course of its routine Annual Inspection and Tree
8 Work Program, EDVM has a practice of cleaning up tree debris
9 less than four inches diameter. EDVM's practice has been to
10 leave larger logs and wood on the tree owner's property so that
11 the owners can sell the wood or use it themselves.

12 In contrast, due to the heavy level of current abatement
13 work since the drought and the amount and size of the wood left
14 behind, PG&E could no longer follow the historical practice.
15 This is because PG&E could not safely conduct dead tree

1 abatement work on properties that were clogged with piles of
2 logs arising from prior abatement work. Similarly, property
3 owners could not safely use their properties; and road rights-of-
4 way needed to be kept clear of log piles and associated debris.
5 These situations made it necessary to remove the logs, as
6 discussed above. PG&E controlled the scope of the work so
7 that it would specifically alleviate these safety issues by
8 performing this work close to residences and along roads and
9 waterways.

10 3) Wildland Urban Interface (WUI) Protection

11 a) Nature of Work

12 The WUI represents areas around the urban environment
13 where conditions in the field, like slopes and vegetation, closely
14 resemble rural areas. However, these areas are usually
15 moderately to densely developed and local agencies are
16 responsible for fire suppression, unlike SRA. The areas are
17 also labeled Local Responsibility Areas (LRA) and CAL FIRE is
18 not primarily responsible for fire suppression.

19 The initiative to increase safety in these areas consists of
20 two main risk reduction efforts in LRAs:

- 21 • Redundant inspection and tree work where segments of
22 overhead conductor in LRA areas were patrolled and dead
23 trees were abated up to four times per year; and
- 24 • Clearing vegetation from around poles with equipment that
25 may issue molten material when the equipment operates.

26 In LRAs, the local fire district, county, or municipal fire
27 services are the primary responders to fire. Generally, faster
28 fire response times occur in LRAs than in SRAs, allowing for
29 quicker suppression by the local fire agency because the local
30 fire agency is generally closer to the ignition.

31 Since these LRA/WUI areas tend to be near urban and
32 suburban centers with high human populations, PG&E
33 determined that the risk to human life and property due to

**EXCERPT FROM PG&E SUPPORTING TESTIMONY
FOR ITS 2020 WILDFIRE MITIGATION AND CATASTROPHIC EVENTS
COST RECOVERY APPLICATION (A.20-09-019)**

Application: 20-09-_____
(U 39 M)
Exhibit No.: _____
Date: September 30, 2020
Witness(es): Various

PACIFIC GAS AND ELECTRIC COMPANY
2020 WILDFIRE MITIGATION AND CATASTROPHIC EVENTS
PREPARED TESTIMONY



TABLE 2-27
FUEL REDUCTION PROGRAM EXPENSE
(THOUSANDS OF DOLLARS)

Line No.	Activity	Account	MAT	2018 Expense	2019 Expense
1	Fuel Reduction	FHPMA	IGJ	\$35,634	\$1,975

3) Accelerated Wildfire Risk Reduction

In September 2018, we transitioned from the Fuel Reduction Program into the Accelerated Wildfire Risk Reduction emergency response effort. Accelerated Wildfire Risk Reduction efforts also mainly focused on Tier 3 HFTD areas, but the program scope required greater radial clearances around conductors and removed vegetation above and beneath conductors (ground to sky clearance).

Our Accelerated Wildfire Risk Reduction activities included:

- Mitigation of hazardous trees with potential to strike PG&E facilities, including: (1) danger trees; (2) trees with poor taper; (3) trees with poor height to crown ratio; and (4) suppressed trees, in accordance with GO 95, Rule 35 and PRC 4293; inspection of the trees in right of way or targeting overhead conductors and mitigation of trees requiring work; and reduction of the potential for overhanging branches to fail and contact primary voltage lines.
- Reduction of fuel underneath and adjacent to high voltage lines (with property owner cooperation).
- **Wood Management: To help avoid costly delays and ensure timely mitigation of trees with potential to impact PG&E facilities, Accelerated Wildfire Risk Reduction included wood removal for customers free of charge.**³⁷

³⁷ Some customers objected to tree removal unless the entire tree was removed from their property. Others preferred to keep the wood for personal use. The rest received a Request for Wood Management form at the time of inspection, which was also available online at pge.com/enhancedveg. When PG&E received a request form, it scheduled the wood debris for removal from the property after completing the tree work.

**PG&E WOOD MANAGEMENT AND REMOVAL
REQUEST FORM
(ENHANCED VEGETATION MANAGEMENT PROGRAM)**



Vegetation Management Request for Wood Management and Removal

Pacific Gas and Electric Company (PG&E) is taking steps every day to improve the safety and reliability of our electric system, which serves nearly 16 million people in Northern and Central California. This includes working together with our customers and communities to manage vegetation that is located near power lines and could pose a safety concern.

Acknowledgement of Wood Removal

We have identified vegetation on your property that needs to be addressed in the interest of public safety. **If you would like PG&E to remove the wood resulting from this tree work, please review and initial next to each item below. We ask that you please sign and return the form to the inspector or email it to wildfiresafety@pge.com prior to vegetation work beginning.**

Tree Quantity: _____

_____ Wood removal under this request constitutes the disposal of wood that is greater than 4 inches in diameter (measured at the small end), created by PG&E vegetation management work as follows:

Wood Removal

- ☐ Wood will be removed from the property:

Quantity of logs: _____; Approximate diameter and length: _____

Wood Management

- ☐ Wood will be cut into smaller sections:

Quantity of logs: _____; Requested cut length: _____

- ☐ Wood will be relocated to a different section on the property:

Quantity of logs: _____; Location logs are to be placed: _____

- ☐ Wood chips will be broadcasted on the property; PG&E will not be responsible to move or remove chips once left on property.

_____ PG&E will provide no financial reimbursement under this operation, including without limitation for removed wood.

_____ Tracked or rubber tire equipment and machinery shall have access to the property when needed to perform the work.

_____ PG&E will not rehabilitate the work zone back to pre-work conditions (though excessive rutting of roads or damage to the property will be mitigated by PG&E's work contractor).

_____ Wood that PG&E deems not to be reasonable will not qualify for removal or management.

_____ Any debris revealed after wood removal (i.e. needles, bark, brush) is the responsibility of the property owner.

Legal Owner's Name

Assessor Parcel Number

Property Address

City

Zip

We greatly appreciate your partnership in the interest of public safety. By signing below you are acknowledging and agreeing to the abovementioned work on the property listed above.

Legal Owner's Signature: _____

Date: _____

PG&E Rep Name and Title: _____

Date: _____

**SONOMA COUNTY AND CITY OF SANTA ROSA
LETTER TO PG&E REGARDING TREE DEBRIS**



December 9, 2020

Bill Smith, CEO
Pacific Gas & Electric Company

Re: Reinstitute Wood Management Program for PG&E Felled Trees in Fire-Impacted Areas

Dear Mr. Smith:

As the Sonoma County Administrator and the Santa Rosa City Manager, we are requesting PG&E reconsider its responsibility to offer assistance to property owners in the removal of trees felled by PG&E and left on properties, which has created additional burdens for fire survivors and new fire-fuel hazards within the Sonoma County wildfire burn areas.

This letter follows up on the November 20, 2020 meeting attended by the City of Santa Rosa (City), County of Sonoma (County), California Governor's Office of Emergency Services (Cal OES), and Pacific Gas & Electric (PG&E) to discuss the status of PG&E's Wildfire Wood Management Program. The meeting was organized in response to questions raised regarding PG&E felled trees during the County of Sonoma and City of Santa Rosa Joint Debris Task Force meetings. In October 2020, PG&E advised the City/County Joint Debris Task Force that there would not be a Wildfire Wood Management Program available for Sonoma County residents and the removal of wood over four inches in diameter and felled by PG&E would be entirely the responsibility of the parcel owner. As of December 2, 2020, PG&E reported that 99.9% of approximately 5,400 Priority 1 trees and roughly half of the 9,000 Priority 2 trees in the Glass Fire have been felled.

The City and County are working in partnership with Cal OES to support the community through the recovery process, which includes two phases. Phase 1 is the removal of household hazardous waste (HHW) that may pose a threat to human health, animals, and the environment such as batteries, asbestos siding, propane tanks, and paints. Phase 2 is the removal of the remaining structural ash and debris as well as soil testing to ensure the site is clean, safe for rebuilding, and free of potentially leached toxins. Phase 2 also includes the removal of fire-damaged hazard trees that are dead or likely to die within five years as a result of the fire as determined by a certified arborist and present a threat to the public Right of Way (ROW), i.e. roadways, and/or public infrastructure, fire hydrants, water meters, etc. The eligible hazard trees would be included in the State's Phase 2 program and removed through the Right of Entry (ROE) process.

Cal OES has determined that trees felled by PG&E that would have been included in the State's Phase 2 program are no longer eligible for inclusion in the program as the trees no longer present a threat. Therefore, trees felled by PG&E are ineligible for removal by the State, and wood over four inches in diameter and felled by PG&E, regardless of Phase 2 eligibility, is the responsibility of the parcel owner.

The City and County believe that the position of PG&E is in conflict with PG&E's local past practice.

In January of 2018, in response to the 2017 Northern California Wildfires, PG&E pruned or felled approximately 30,000 hazard trees within the fire-impacted communities in Northern California to reduce wildfire and public safety risk – 10,600 of those trees were in Sonoma County's fire burn scar areas. To aid property owners with the removal of larger wood that they had felled, PG&E offered an "opt in" Wildfire

Wood Management Program at no cost to property owners throughout northern California burn areas. At the time of the program rollout, Dave Canny, senior manager of PG&E's North Bay and Sonoma Divisions stated, "We are committed to helping our customers recover from the devastating wildfires last fall. We're offering this wood removal service to reduce wildfire risk created by hazard trees piling up, and to help ensure that customers can safely enjoy their property." Additionally, in April of 2019, in response to customer and local government feedback, PG&E announced a streamlined process for no-cost wood debris removal on private property for trees the company felled in the Camp Fire burn area.

Our agencies continue to work tirelessly to increase the resiliency of our community to effectively respond to future wildfires. Local fire officials wholeheartedly agree with PG&E's past acknowledgement that removing felled trees reduces wildfire risk. We also understand the burden fire survivors face as they recover from devastating loss, rebuild their homes, and/or prepare their burned properties for winter and new types of post-fire weather hazards. Fire survivors should not also have to take on the burden of removing trees felled by PG&E if they do not wish to or have the means to. Many homeowners' insurance policies exclude tree removal from debris removal coverage, and instead offer a nominal amount under a separate coverage. By felling these hazard trees, PG&E has also taken away these property owners' eligibility to have the trees removed through the state debris removal program where there would have been no out of pocket cost to the homeowner. Those who lost homes in the fires are forced to use funds from their rebuild coverages for the removal costs of these felled trees.

In the interest of public safety and to rightfully support fire survivor's ability to rebuild in our community, we respectfully request PG&E to reconsider their responsibility in the removal of this fire-fuel hazard in Sonoma County burn areas. These property owners have a long road ahead of them and reinstituting PG&E's Wildfire Wood Management Program could ease some of their challenges during a difficult recovery. We also request that PG&E coordinate their future efforts with Cal OES to ensure residents are not burdened with the cost of wood removal that could have been included in a State-managed Phase 2 Debris Removal Program.

Thank you for your continued support of our community's recovery from the devastating impacts of wildfire disasters.

Respectfully,



Sheryl Bratton
County Administrator, County of Sonoma



Sean McGlynn
City Manager, City of Santa Rosa

Attachment: Photos of PG&E felled trees left on properties

CC:

The Honorable Mike Thompson, United States Congress
The Honorable Jared Huffman, United States Congress
The Honorable Kamala Harris, United States Senate
The Honorable Dianne Feinstein, United States Senate
The Honorable Mike McGuire, California State Senate
The Honorable Bill Dodd, California State Senate
The Honorable Marc Levine, California State Assembly
The Honorable Jim Wood, California State Assembly
The Honorable Cecilia Aguiar-Curry, California State Assembly

Sonoma County Board of Supervisors

Santa Rosa City Council

Amber Lane, Inland Branch Director – 2020 Statewide Wildfire Recovery Operations, Cal OES

Paul Schlesinger, Alcalde & Fay

Kyriakos Pagonis, MMO Partners

Paul Yoder and Karen Lange, Shaw Yoder Antwih Schmelzer & Lange, Inc.

Kyra Emanuels Ross & David Jones, Emanuels Jones & Associates

Melinda Rivera, PG&E Local Government Affairs Representative —Lake and Sonoma Counties

Photos showing some examples of where PG&E felled trees have been left on properties in wildfire-impacted areas



Photos showing some examples of where PG&E felled trees have been left on properties in wildfire-impacted areas



**PG&E RESPONSE TO SONOMA AND SANTA ROSA LETTER,
AND FORM LETTER TO NAPA COUNTY REGARDING TREE DEBRIS**



Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105

December 18, 2020

Sheryl Bratton
County Administrator, County of Sonoma
575 Administration Drive, Suite 104A
Santa Rosa, CA 95403

Sean McGlynn
City Manager, City of Santa Rosa
100 Santa Rosa Avenue, Room 10
Santa Rosa, CA 95404

RE: Wood Management Program for PG&E Felled Trees in Fire-Impacted Areas

Dear County Administrator Bratton and City Manager McGlynn,

Thank you for your letter dated December 9, 2020, regarding Pacific Gas and Electric Company's (PG&E) emergency fire response work and wood management in Sonoma County. We understand the hardships Sonoma County and City of Santa Rosa residents are facing as a result of the wildfires that have become all too common across our state. And just as local and state governments and utilities like PG&E all need to work together to mitigate the risk of wildfires, a similar joint effort is needed to deal with the aftermath of those fires, including how tens of thousands of burned trees are managed.

PG&E's mission is to provide safe, reliable and affordable electric and gas service across our territory. Our most important responsibility in doing so is protecting the safety of our customers and communities as well as our crews and contractors. We'd like to provide an overview of our wood-management program to address a few of the points you made in your letter.

- Before we can safely restore power to our customers after a wildfire, we inspect the trees near our facilities and then fell or trim parts of those trees damaged in the fire (dead, dying, weakened, structurally damaged, showing root damage, etc.) that might pose a safety risk to our facilities.
- We cut down these high-risk trees first so we can turn the electricity back on without risk of fire-damaged trees (and tree parts) falling on the energized facilities causing an outage or another wildfire. This work is done in coordination with CAL FIRE and other agencies responding to the wildfires to re-populate evacuated areas.
- When tree work is complete, PG&E crews chip wood that is less than four inches in diameter and spreads the chips on-site, where possible. In remote areas, tree crews lop and scatter wood debris at a height of less than 18 inches in accordance with best forestry and safety practices. This helps reduce the fire risk of flashy fuels, supports debris decomposition and supports erosion control.
- Wood larger than four inches in diameter on private property belongs to the landowner and is left on the property.
- When performing emergency work, our crews always strive to make the area safe before they leave the site. The pictures included with your letter prompted me to ask my

Vegetation Management team to go back and conduct an additional patrol to address any PG&E-felled trees that may create safety hazards near roadways. We will update you on the results of those patrols.

We agree that the debris-removal programs available to cities and counties after wildfires would benefit from increased coordination between utilities and other agencies offering them. We have spoken with FEMA and are currently in conversations with Cal OES to ask they revisit their determination that trees we cut down in response to wildfire emergencies are not hazards and not applicable for removal by the State. We believe that the coordination of our program with state and federal programs would lead to a better solution for property owners.

With more than 9,600 fire incidents and nearly 4.2 million acres burned in California this year alone, the issue of how to deal with wildfire-impacted trees and the associated wood management must be addressed across the state. While the 2020 wildfires led to roughly 14,000 trees requiring work in Sonoma County, addressing all 150,000 to 200,000 such trees damaged by wildfires across PG&E's service territory would add considerable cost to PG&E's customers. This is an issue that cannot be solved by one entity; we all must work together.

As a step toward finding a solution to this issue, we would like to propose a meeting with Sonoma County, the City of Santa Rosa, and include other jurisdictions impacted by 2020 wildfires to discuss improved coordination and potential improvements to the programs moving forward. Some potential partners in this conversation would be Cal OES, CalRecycle and potentially other agencies and entities that are involved in wildfire recovery and debris management efforts. We would appreciate your help in bringing those parties to the table in order to have a full discussion about how to best support California residents with debris removal after a wildfire. Our Local Public Affairs representative, Melinda Rivera, will be reaching out to you soon to arrange a meeting shortly after the first of the year.

Thank you for your letter and sharing your concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "William L. Smith".

William L. Smith. | Interim Chief Executive Officer
Pacific Gas and Electric Company
415-218-6366 william.smith@pge-corp.com

January 6, 2021

Diane Dillon
Board of Supervisors Chair, Napa County
1195 Third St.
Napa, Ca 94559

RE: Wood Management Program for PG&E Felled Trees in Fire-Impacted Areas

Dear Board of Supervisors Chair Dillon,

Thank you for your letter dated December 9, 2020 to our then interim Chief Executive Officer Bill Smith, regarding Pacific Gas and Electric Company's (PG&E) emergency fire response work and wood management in Napa County. I am responding to your letter to Bill Smith, who stepped away as interim CEO this week with the arrival of Patti Poppe, our new CEO. As the Vice President of Major Projects and Programs within our Electric Operations team, our Vegetation Management team reports to me. Our work in your community is very important to me and I look forward to working together with you and the Napa community on solutions.

Regarding your letter, I worked closely with our vegetation management team who quickly brought me up to speed to better understand your concerns. We recognize the residents of Napa County are already facing tremendous burdens as a result of devastating wildfires, particularly the LNU Lightning Complex and Glass Fires, that have become all too common across our state. And just as local and state governments and utilities like PG&E all need to work together to mitigate the risk of wildfires, a similar joint effort is needed to deal with the aftermath of those fires, including how tens of thousands of burned trees are managed.

PG&E's mission is to provide safe, reliable and affordable electric and gas service across our territory. Our most important responsibility in doing so is protecting the safety of our customers and communities as well as our crews and contractors. We'd like to provide an overview of our wood-management program to address a few of the points you made in your letter.

- Before we can safely restore power to our customers after a wildfire, we inspect the trees near our facilities and then fell or trim parts of those trees damaged in the fire (dead, dying, weakened, structurally damaged, showing root damage, etc.) that might pose a safety risk to our facilities.
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Board of Supervisors Chair Dillon
January 6, 2021
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We agree that the debris-removal programs available to cities and counties after wildfires would benefit from increased coordination between utilities and other agencies offering them. We have spoken with FEMA and are currently in conversations with Cal OES to ask they revisit their determination that trees we cut down in response to wildfire emergencies are not hazards and not applicable for their removal by the state. We believe that the coordination of our program with state and federal programs would lead to a better solution for property owners.

With more than 9,600 fire incidents and nearly 4.2 million acres burned in California this year alone, the issue of how to deal with wildfire-impacted trees and the associated wood management must be addressed across the state. While we understand the ask to re-activate programs and processes to remove these trees in Napa County, we would need to do this across our entire territory. Addressing all 150,000 to 200,000 such trees damaged by wildfires across PG&E's service territory would add considerable cost to PG&E's customers. This is an issue that cannot be solved by one entity; we all must work together.

As a next step towards a collaborative solution, we would like to propose a meeting with Napa County, and include other jurisdictions impacted by 2020 wildfires to discuss improved coordination and potential improvements to the programs moving forward. We have already been in discussions with some of your neighboring counties regarding this and believe a joint discussion would be most beneficial for everyone to find the best solution. Some additional potential partners in this conversation would be Cal OES, CalRecycle and potentially other agencies and entities that are involved in wildfire recovery and debris management efforts. We would appreciate your help in bringing those parties to the table in order to have a full discussion about how to best support California residents with debris removal after a wildfire. Our Local Public Affairs representative, Mark van Gorder, will be reaching out to you soon to arrange a meeting.

Thank you for your letter and sharing your concerns.

Sincerely,

A handwritten signature in black ink, reading "Ahmad Ababneh".

Ahmad Ababneh
Vice President – Major Projects and Programs
Pacific Gas and Electric Company

Some of the measures included in this document are contemplated as additional precautionary measures intended to further reduce the risk of wildfires.