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FILED
10/20/22
04:59 PM
A2210023

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August 16, 2021

Transmittal via OIES e-filing and R.18-10-007 service list

RE: MUSSEY GRADE ROAD ALLIANCE COMMENTS ON THE 2021 WILDFIRE MITIGATION PLAN Q2 QUARTERLY REPORTS OF SDG&E, PG&E, AND SCE

Dear Office of Energy Safety Infrastructure,

The Mussey Grade Road Alliance (MGRA or Alliance) files and serves these comments on the second quarter 2021 reports of SCE,[1] SDG&E,[2] and PG&E[3] pursuant to the WSD Guidance letter of July 17, 2020,[4] which authorized public comment within 14 days of their mailing for Remedial Compliance Plans (RCPs) and Quarterly Reports (QRs).

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[1] 2021-WMPs; Southern California Edison Company's Quarterly Notification Pursuant to Public Utilities Code Section 8389(e)(7) Regarding the Implementation of Its Approved Wildfire Mitigation Plan and Its Safety Culture Assessment and Safety Recommendations; and
SCE's 2020-2022 Wildfire Mitigation Plan (WMP) Progress Update – Q2 2021; August 2, 2021 (SCE QR); and
Southern California Edison Q2 2021 Quarterly Data Report; August 2, 2021 (SCE QDR)

[2] 2021-WMPs; QUARTERLY NOTIFICATION TO THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY REGARDING SDG&E'S IMPLEMENTATION OF ITS WILDFIRE MITIGATION PLAN, PURSUANT TO PUBLIC UTILITIES CODE SECTION 8389(e)(7); Attachment A; 2021 Progress Update Q2; August 2, 2021; and
San Diego Gas & Electric Company's Quarterly Data Report on WMP Spatial and Non-Spatial Data (QDR); August 2, 2021; (SDG&E QDR)

[3] 2021-WMPs; Pacific Gas and Electric Company's Quarterly Advice Letter Pursuant to the Office of Energy Infrastructure Safety's Compliance Operational Protocols and Assembly Bill 1054 Regarding the Implementation of Its Approved Wildfire Mitigation Plan and Its Safety Recommendations; August 2, 2021; and
PACIFIC GAS AND ELECTRIC COMPANY QUARTERLY REPORT ON 2020 WILDFIRE MITIGATION PLAN FOR SECOND QUARTER 2021; August 2, 2021. (PG&E QR)

[4] Guidance on the Remedial Compliance Plan & Quarterly Report Process Set Forth in Resolution WSD-002; Caroline Thomas Jacobs; July 17, 2020.

The following Alliance comments were prepared by MGRA's expert witness, Joseph W. Mitchell, Ph.D.

1. PILOT PROGRAMS

1.1. SCE and SDG&E Should Report Progress on Pilot Programs

A general criticism issued by the Wildfire Safety Division with regard to the 2020 Wildfire Mitigation Plans is that:

"*Electrical corporations do not describe how they will evaluate and expand the use of successfully piloted technology or which piloted technology has proven ineffective. To ensure pilots that are successful result in expansion, if warranted and justified with quantitative data, electrical corporations must evaluate each pilot or demonstration and describe how it will expand use of successful pilots*."

This deficiency was listed as Guidance-9 in WSD's 2020 WMP evaluation.[5]

PG&E addresses this deficiency with 80 pages of documentation in its quarterly data report.[6] In addition to descriptions of the pilot projects, which have been presented in their 2021 WMPs, PG&E discusses progress made during the second quarter of 2021.

SCE and SDG&E's quarterly reports lack an equivalent update regarding pilot programs, and do not address the Guidance-9 deficiency in WSD-002. While pilot programs were addressed in their 2021 filings, description of any progress in the last few months is lacking.

Recommendation:

OEIS should require all utility to report on progress of advanced technology projects as part of any status report.

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[5] WSD-002; Appendix A; A-9.
[6] PG&E QR; pp. 1-80.

1.2. PG&E's Undergrounding Announcement Threatens to Render All Technology Programs Moot

Advanced technology programs are particularly important due to the increasing urgency of the utility wildfire problem, exacerbated by the linking of the Dixie fire to PG&E equipment and PG&E's subsequent announcement that it plans to underground 10,000 miles of power lines in HFTD areas.[7] It bears noting that this switch in prioritization and strategy, if it were to occur, undoes the efforts taken over the past decade by the CPUC and OEIS to mandate cost-effective wildfire safety measures through the S-MAP/RDF/RAMP process and the Wildfire Mitigation Plans. Undergrounding, while an effective method of eliminating wildfire risk, has generally be acknowledged as one of the least cost-effective ways of approaching the problem. Adoption of this strategy by PG&E will likely lead to similar approaches by the other utilities, particularly if the possibility of accessing taxpayer funds is added to the mix. There is a real danger that other mitigation methods that are more cost effective or that are based on promising but not yet fully available technology (like REFCL) but that may be available on a shorter timeline that a full undergrounding program may be sidelined.

The slow pace of PG&E's REFCL evaluation should is therefore a critical issue. For Q2, the summary of its progress is:

"*Substation and distribution commissioning completed.*
First staged fault test successfully performed."[8]

In its reply comments on the 2021 WMPs, MGRA recommended that "*WSD should require PG&E to develop a proposal for a 'moon shot' program that could mitigate areas exposed to expanded shutoff with REFCL within the next few years and potentially reduce the need for environmentally damaging expanded EVM. If feasible and sound, the same approach could be adopted by other IOUs*."[9] Ironically, PG&E CEO Patricia Poppe used similar language to describe the proposed PG&E undergrounding project: "*This year the company is putting 70 miles of lines*

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[7] PG&E Will Bury 10,000 Miles of Power Lines So They Don't Spark Wildfires; Associated Press; July 21, 2021. (NPR)
https://www.npr.org/2021/07/21/1019058925/utility-bury-power-lines-wildfires-california
[8] PG&E QR; p. 20.
[9] RE: MUSSEY GRADE ROAD ALLIANCE REPLY TO STAKEHOLDER COMMENTS ON 2021 WILDFIRE MITIGATION PLANS OF PG&E, SCE, AND SDG&E; Served on WSD; April 13, 2021; p. 11.

underground, so increasing the work to 1,000 miles a year would be a leap. 'That's the moonshot,' Ms. Poppe said on a call with reporters. 'It should be a shocking number because it's a big goal."[10]

As MGRA noted in its comments on the GRC, the CPUC should "*address the question of whether this money should be directed more towards advanced technologies that can eliminate wildfire risk rather than a brute force method. After all, we did not get to the moon by building bigger and bigger trebuchets*."[11]

Recommendation:

Energy Safety should conduct workshops on "moon shot" programs that would be most effective in eliminating or minimizing wildfire risks in a short time frame, including undergrounding and advanced technology projects.

2. IMPROVEMENTS IN TRANSPARENCY

PG&E's QR notes that meetings have occurred between the OEIS staff (then still Wildfire Safety Division) and IOUs regarding data reporting:
"*On June 23, 2021, OEIS held a joint meeting with the electrical corporations to communicate expectations around 2021 WMP data reporting, including desired alignments across spatial and non-spatial reports. Subsequently, PG&E sent a list of questions to OEIS to better align on reporting requirements and provide feedback. PG&E welcomes further collaboration between OEIS and the electrical corporations*."[12]

While there is a need for the IOUs and OEIS staff to align on data reporting issues, some of these issues are of interest to stakeholders. In particular, the urgency for inclusion of certain fields, the availability of data, and the question of confidentiality are of issues that stakeholders including MGRA have raised in the past.

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[10] PG&E Aims to Curb Wildfire Risk by Burying Many Power Lines; Ivan Penn; New York Times; July 21, 2021.
https://www.nytimes.com/2021/07/21/business/energy-environment/pge-underground-powerlineswildfires.html
[11] A.21-06-021; MUSSEY GRADE ROAD ALLIANCE PROTEST OF PACIFIC GAS AND ELECTRIC COMPANY 2023 GENERAL RATE CASE APPLICATION; August 5, 2021; p. 7.
[12] PG&E QR; p. 86.

Recommendation:

Future discussions between IOUs and the OEIS should include a public meeting where questions can be raised and stakeholder feedback can be incorporated into the discussion.

3. CONFIDENTIALITY

Some utility comments regarding confidentiality issues have carried over from previous quarterly filings and from the WMP Update. MGRA has addressed these issues in previous comments.

- SDG&E requests the inclusion of a confidentiality attribute within each feature class, as this would help it scrub confidential information in response to data requests for non-confidential data.[13] MGRA continues to support this request.
- Likewise, PG&E "would appreciate collaboration with OEIS and the other electrical corporations to develop a more standardized method for the identification and treatment of confidential information."[14] While MGRA favors efforts to standardize utility filings, we urge OEIS to include public input from non-utility stakeholders when making decisions regarding confidentiality.
- SCE continues to raise broad concerns regarding confidentiality and potential risks to its infrastructure. MGRA continues to oppose SCE's call for more stringent confidentiality standards, concluding that: "Hiding this kind of information from the public only serves the purpose of making it more difficult for stakeholders and interested members of the public to scrutinize utility wildfire risks and mitigations."[15]

4. NORMALIZATION OF METRICS FOR WEATHER CONDITIONS

SCE states in its QR that it is now pursuing various avenues to normalize metrics for "exogenous factors, including but not limited to, weather and 3rd party suppression efforts."[16] They

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[13] SDG&E QR; p. 2
[14] PG&E QR; p. 90.
[15] RE: MUSSEY GRADE ROAD ALLIANCE COMMENTS ON 2020 WILDFIRE MITIGATION PLAN Q4 QUARTERLY REPORT OF SDG&E, PG&E, AND SCE; Served on WSD; March 29, 2021; pp. 5-6.
[16] SCE QR; p. 12.

explain that: "Faults and wire-down events are also key metrics as they are leading indicators of potential ignitions. Importantly, these metrics are within the reasonable control of utilities when appropriately normalized for weather and other exogenous factors."[17]

MGRA has supported this position in our submissions to the RDF/SMAP CPUC proceeding: "MGRA re-emphasizes that any metrics that can be skewed by external events must necessarily normalized to the frequency, intensity, extent, and duration of these events to ensure that the metrics reasonably represent vulnerability of the utility infrastructure to external drivers."[18] MGRA's expert also gave a presentation on ideas for normalization on July 21, 2021.

SCE, however, continues to support the National Fire Danger Rating System (NFDRS) as a normalization metric instead of National Weather Service Red Flag Warning.[19] MGRA opposed this position in our comments on SCE's Q1 QR. As noted in its comments:

"*NFDRS would not be expected to be correlated in any significant way with utility fire ignition. As MGRA showed in its 2021 WMP comments, RFW metric does apparently correlate with ignition.*

This request would seem to follow a disturbing tendency of utilities, specifically PG&E and SCE, trying to reframe the utility wildfire problem as simply a wildfire problem, one in which the ignition component is ignored."[20]

OEIS should encourage and evaluate the development of "resilience" metrics and appropriate normalization for weather conditions by all utilities. However, it should only consider metrics that accurately track utility ignition risk. While Red Flag Warning criteria are far from ideal, the NFDRS would not accurately represent utility wildfire risk or provide a metric against which utility metrics could be scaled.

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[17] Id..
[18] R.20-07-013; MUSSEY GRADE ROAD ALLIANCE REPLY TO PARTY COMMENTS REGARDING STAFF RECOMMENDATIONS; July 9, 2021; p. 9.
[19] SCE QR; pp. 13-14.
[20] RE: MUSSEY GRADE ROAD ALLIANCE COMMENTS ON 2021 WILDFIRE MITIGATION PLAN Q1 QUARTERLY REPORT OF SDG&E, PG&E, AND SCE; Served on WSD; May 17, 2021; p. 6.

7. CONCLUSION

The Alliance appreciates the opportunity to provide feedback to the Office of Energy Infrastructure Safety and looks forward to providing additional input as part of the 2021 Wildfire Mitigation Plan review cycle.

Respectfully submitted this 16th day of August, 2021,

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