



November 16, 2023

Saab Bagri
Supervisor, Safety Culture and Governance
Safety Policy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298
wildfirerca@cpuc.ca.gov

Re: **Comments of Pacific Gas and Electric Company on Draft Resolution SPD-19**
Service List: I.19-06-015 and R.18-10-007

Dear Supervisor Bagri:

Pacific Gas and Electric Company (PG&E) respectfully submits the following comments on Draft Resolution SPD-19, issued on October 27, 2023, which proposes to adopt corrective actions resulting from the Root Cause Analysis ordered by Decision 20-05-019. PG&E does not contest the four corrective actions identified in the Draft Resolution, but instead offers the following recommendations which seek to improve the process of implementing these four corrective actions.

I. ADDITIONAL TIME WILL LIKELY BE NECESSARY TO COMPLETE ALL OF THE CORRECTIVE ACTIONS IN THE DRAFT RESOLUTION

PG&E is committed to completing these corrective actions in a timely manner. However, the need to simultaneously complete other critical wildfire mitigation work,¹ combined with the lengthy lead time requirements needed to complete the corrective actions identified, will create a challenge in meeting the proposed completion date of December 31, 2025.² Examples of items that require necessary lead time includes the planning, engineering, and standards work that must be completed prior to the initiation of the actual work in question. Therefore, we ask for either an extension of 12 months to the proposed completion date, or the creation of a simple process to request the extension, with expedited approval, should it become necessary.

II. INITIATING SOME PHASE 2 ACTIVITIES IN PARALLEL WITH PHASE 1 ACTIVITIES WILL ALLOW THE WORK TO BE COMPLETED MORE EFFICIENTLY

¹ This includes the numerous wildfire mitigation initiatives identified in PG&E's 2023-2025 Wildfire Mitigation Plan.

² See Draft Resolution (Res.) SPD-19 at 12.

PG&E also recommends that the Draft Resolution be revised to allow for the ability to initiate some Phase 2 activities in parallel with Phase 1 activities. This would be particularly beneficial for Corrective Actions 1, 2, and 3³ where some Phase 2 planning, engineering, and standards work can be completed prior to the approval of the Phase 1 deliverables. Currently, the Draft Resolution proposes that all Phase 1 work must be developed and approved prior to beginning the Phase 2 work, which involves the actual performance of the work at issue.⁴ By allowing for some of this Phase 2 work—specifically planning, engineering, and standards work—to occur as the same time as the Phase 1 work, the implementation of these corrective actions will be expedited and made more efficient.

III. CONCLUSION

PG&E appreciates the opportunity to provide these comments and look forward to further discussions and engagement on the corrective actions.

Should you have any questions or concerns, please do not hesitate to contact the undersigned at Anne.Beech@pge.com.

Very sincerely yours,

/s/ Anne Beech

Anne Beech

³ Corrective Action 4 is not separated into two phases. Draft Res. SPD-19 at 5.

⁴ Draft Res. SPD-19 at 5.