



County of Santa Cruz

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October 18, 2018

Geisha J. Williams, CEO and President
Gregg L. Lemler, Vice President, Electric Transmission Operations
Pacific Gas & Electric Corporation
77 Beale Street
San Francisco, CA 94105

Dear Ms. Williams and Mr. Lemler:

Thank you for the opportunity to share concerns about the implementation of PG&E's Community Wildfire Safety Program in Santa Cruz County, which began in early September. For more than a month now, PG&E personnel and their contracted vegetation crews have participated in marking, limbing, trimming and removing trees and other vegetation on private property near power lines, poles and other infrastructure without a robust public outreach program, which has caused a great deal of confusion and suspicion among our constituents. Meanwhile, PG&E has been in negotiations with Santa Cruz County officials regarding an encroachment permit to conduct enhanced vegetation work in the County's right-of-way in keeping with the County's environmental authority.

While the Wildfire Safety Program continues to roll out, let us begin by recognizing the extreme fire danger that exists throughout California, including in the San Lorenzo Valley, which is part of Santa Cruz County's 5th District and California's 29th Assembly District. We also acknowledge the enhanced vegetation management authority granted to PG&E by the California Public Utilities Commission to reduce the risk of fire posed by trees and limbs that could contact compromised power lines and poles. We don't dispute that some enhanced vegetation work is necessary on both private and public property, especially where there is already widespread direct contact between trees, poles and transmission wires.

Setting aside the lack of transparency about the scope of the Wildfire Safety Program, our primary concern relates to the lack of information available about PG&E's plans to repair and replace its aging infrastructure. Communications to date from PG&E about the Community Wildfire Safety Program demonstrate that PG&E is focused primarily on

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performing enhanced vegetation management and preparing customers for the possibility of temporary power shut-offs to reduce risk, in addition to assurances of better monitoring and predicting wildfire risk.

Removing vegetation within a 24-foot radius of power lines and poles – and in extreme cases a 30-foot radius – will have an indelible impact on heavily forested areas such as the San Lorenzo Valley, thus causing the potential loss of critical habitat and increasing the likelihood of erosion and the introduction of invasive species, among other environmental and safety concerns. Likewise, shutting off power for undetermined periods of time during times of high fire danger place geographically isolated and medically vulnerable people at risk. Neither of these efforts should be pursued without an equal effort by PG&E to deepen and hasten its investment in hardening its system, especially considering that faulty or poorly protected infrastructure arguably poses the greatest fire risk.

The California Department of Forestry and Fire recently determined that PG&E's sagging power lines were the cause of 2017 fires that killed four people. Yet, PG&E's webpage about the Community Wildfire Safety Program makes only a vague reference to hardening the system and integrating new technologies to improve strength and resiliency "over the longer term." Additionally, in response to a question to PG&E about the infrastructure repair and replacement plans, a PG&E public affairs officer for Santa Cruz County emailed Supervisor McPherson's staff, "We are in the planning stages now for these system hardening efforts and will be implementing them in high fire-risk areas across our service area, including in Santa Cruz County, over the years to come."

It's regrettable that PG&E hasn't provided greater specifics about its infrastructure replacement plans and does not appear to be working on insulating power lines and replacing wooden power poles simultaneously – or certainly at the same volume or speed – as it is conducting vegetation removal.

By comparison, Southern California Edison, which serves more than 15 million people over 50,000 square miles, proactively announced in September 2018 a proposed \$582 million investment in a "Grid Safety and Resiliency Program" that, pending PUC approval, would replace nearly 600 miles of overhead power lines in high-risk fire areas with insulated wire by the end of 2020. The plan, prominently displayed on Southern California Edison's webpage about its own Wildfire Safety Program, also calls for installing fire-resistant poles and taking other measures to reduce risk within the company's infrastructure.

A statement from Southern California Edison's Senior Vice President of Transmission and Distribution said, "The devastation caused by the 2017 and 2018 wildfires leaves no doubt that wildfire risk has increased to the point where California needs to reassess the

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way we collectively prepare for and prevent wildfires. This includes a role for utilities in going beyond existing state standards and traditional utility practices to incorporate leading mitigation measures from around the world, selected based on their effectiveness."

We urge PG&E to immediately adopt similar prioritization of infrastructure improvement on behalf of PG&E's 4 million electric customer accounts and 4.3 million natural gas customer accounts, especially those in high-fire risk areas like the San Lorenzo Valley. It may be a less expensive and complicated endeavor for PG&E to prioritize vegetation removal over infrastructure replacement and repair. However, hardening the system in the short term, rather than in the long term as PG&E has previously stated, could prove to be as effective, if not more so, than vegetation management at reducing immediate risk of fire danger.

Thank you, and we respectfully request a response to this letter that provides more specific information about PG&E's plans to replace and improve lines, poles and other infrastructure.



BRUCE MCPHERSON, Supervisor
Fifth District

Sincerely,



MARK STONE, Assemblymember
District 29

cc: Michael Picker, President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-