



[www.mountaincountieswater.com](http://www.mountaincountieswater.com)

#### Board of Directors and Officials

Scott Ratterman (CCWD) – President  
Barbara Balen (TUD) – Vice President  
Jim Holmes (County of Placer) – Secretary  
Lori Anzini (EID) – Treasurer  
Mike Lee (PCWA) – Director  
Lori Parlin (County of El Dorado) – Director  
Sue Hoek (County of Nevada) – Director  
Don Blaser (YWA) – Director  
Susan Peters (AWA) – Director

Dave Breninger, retired (PCWA) – Governmental Affairs Official  
Tom Cumpston – Legal Counsel

Justin Caporusso – Executive Director

#### Executive Members

Amador Water Agency  
Calaveras County Water District  
County of Alpine  
County of Amador  
County of Calaveras  
County of El Dorado  
County of Nevada  
County of Placer  
County of Tuolumne  
County of Yuba  
El Dorado Water Agency  
El Dorado Irrigation District  
Foresthill Public Utility District  
Georgetown Divide  
Public Utility District  
Grizzly Flats  
Community Services District  
Jackson Valley Irrigation District  
Murphys Sanitary District  
Placer County Water Agency  
South Tahoe Public Utility District  
Tuolumne Utilities District  
Twain Harte  
Community Services District  
Union Public Utility District  
Utica Water and Power Authority  
Yuba Water Agency

#### Affiliate Members

City of Folsom  
Santa Clara Valley Water District

President Alice Reynolds  
California Public Utilities Commission  
505 Van Ness Ave,  
San Francisco, CA 94102

***Transmitted Via Email: [Alice.Reynolds@cpuc.ca.gov](mailto:Alice.Reynolds@cpuc.ca.gov)***

October 13, 2023

President Reynolds:

I'm writing on behalf of Mountain Counties Water Resources Association (MCWRA), a nonprofit organization, in support of Pacific Gas and Electric's 2023 General Rate Case, specifically the areas funding the company's plans to place 2,100 miles of power lines underground by 2026 to reduce wildfire risk.

We are extremely concerned with the Commission's Proposed and Alternate Proposed decisions, which direct the company to dramatically scale back its undergrounding efforts, creating an energy system that is both less safe and less reliable than it would be under PG&E's original proposal.

While there is no single solution to California's ongoing wildfire crisis, undergrounding electric lines in high-risk areas is the best long-term solution to keep customers and communities safe. Underground lines are not vulnerable to tree strikes caused by high winds and are better protected from wildlife, objects, and environmental conditions that cause degradation and failure. Consequently, placing overhead lines underground reduces ignition risk by approximately 98 percent.

MCWRA members are extremely concerned about maintaining energy affordability in the Sierra Nevada and foothills region. Wildfire risk, declining energy reliability, and poorly executed vegetation management all pose significant safety and economic burdens upon our members, their customers, and local residents. Our mountain county region shares a disproportionate burden of those risks and costs. We support mitigating both risks and cost increases, specifically within California's Wildland Urban Interface, which is most susceptible to wildfire and its devastating impacts. MCWRA supports authorizing PG&E to move forward with the more than 2,000 miles of undergrounding it has planned for California's most at-risk communities.

The Commission's Proposed and Alternate Proposed Decisions instead opts to direct PG&E to leave risk on the system, while also continuing to impact reliability through the long-term use of the Enhanced Powerline Safety Settings (EPSS) and Public Safety Power Shutoff (PSPS) program.

Since the historic outages of 2019, PG&E has maintained that Californians should not be forced to choose between safety and reliability, and that programs such as EPSS and PSPS are meant to be short-term solutions, while more durable fixes, such as undergrounding, are implemented at scale. The CPUC's decisions, reverse this logic, instead stating that Californians should be expected to endure EPSS and PSPS outages in perpetuity.

In addition to reducing the reliability concerns presented by the EPSS and PSPS programs, undergrounding at the scale initially proposed by PG&E would also create an electric grid that is more resilient to weather impacts, including those seen outside of wildfire season.

Earlier this year, Northern and Central California were hit with a series of historic winter storms that resulted in more than 7 million PG&E customers experiencing an outage. For a large majority of these customers, the outage was caused by trees or other vegetation falling into electric lines after months of soil saturation and high winds. The Commission's Proposed and Alternate Proposed Decisions direct PG&E to install covered conductor in lieu of undergrounding to save money, but this solution would still leave PG&E's grid vulnerable to the very same hazards that played out only a few short months ago.

With instances of extreme weather expected to increase in the years ahead, undergrounding at scale is the only solution that would eliminate the possibility of such outages occurring.

We ask the Commission to revisit its Proposed and Alternate Proposed Decisions, and instead authorize PG&E to move forward with the more than 2,000 miles of undergrounding it has planned for California's most at-risk communities.

Sincerely,



Justin Caporusso, Executive Director  
Mountain Counties Water Resources Association

c: Board of Directors, Mountain Counties Water Resources Association