

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



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Order Instituting Investigation on the
Commission's Own Motion to Determine
Whether Pacific Gas and Electric Company
and PG&E Corporation's Organizational
Culture and Governance Prioritize Safety

Investigation 15-08-019
(Filed August 27, 2015)

REPLY COMMENTS OF EMF SAFETY NETWORK

EMF Safety Network (Network) submits these Reply Comments in the Order Instituting Investigation on the Commission's Own Motion to Determine Whether Pacific Gas and Electric Company and PG&E Corporation's Organizational Culture and Governance Prioritize Safety. Pursuant to rule 11.6, an extension for the due date for Reply Comments was granted. The due date was moved to February 28, 2019 in an email ruling filed January 24, 2019, by Administrative Law Judge Peter V. Allen. Network will submit this pleading before the due date.

Network supports Comments by Parties for improved Commission regulation of PG&E, and the need for detailed, transparent, and public information related to PG&E's safety problems. PG&E's catastrophic problems over the last ten years have happened since smart meter and smart grid microwave equipment were added to the power grid. Improved regulatory oversight and an investigation of the smart power grid is warranted.

Network supports PG&E Comments in part: *"The Commission's regulatory approach can significantly impact the development of a healthy safety culture."* (p.6) However, PG&E's suggestion of "self-evaluation" is insufficient: *"Regulatory action should promote effective self-evaluation and cultural improvements by creating an environment that is focused on continuous improvement, speaking up, and learning."* (p.6) Network agrees that all stakeholders, including customers and those doing the jobs need to be heard. A robust system of safety accountability driven by customer and worker experience is needed: *"The purpose of fostering this type of safety culture is not to be lax on discipline; rather, it is to encourage all stakeholders to relentlessly identify and fix systemic risks to the public and workforce."* (p.6)

Network supports the Comments of The Utility Reform Network (TURN): "In the meantime, one

thing is abundantly clear: the Commission must prepare itself to regulate PG&E more aggressively, more invasively, than in the past. PG&E's repeated safety incidents demonstrate that a regulatory approach of "trust but verify" is woefully inadequate under the current circumstances." (p.8)

TURN refers to the lack of transparency and absence of vital information on wildfires: "However, the record in this proceeding excludes critical information regarding PG&E's safety-related operations and performance...None of these reports are in the record of this proceeding, but more importantly, TURN does not believe that the 11 Investigation Reports referred by CAL FIRE to the applicable local county District Attorney for possible criminal prosecution are publicly available." (p.24)

Network agrees with the Public Advocate's Office: "... the Public Advocates Office recommends that any solution to PG&E's failings should achieve six goals: A. Improving safety; B. Protecting consumers; C. Protecting workers and suppliers; D. Fairness; E. Accountability; and F. Improving future performance." (p.2-4)

Network agrees with the Public Advocates office that detailed safety information be made available to the public, however *we ask for records dating back not five, but ten years.* "Third, the Commission should require PG&E to file a comprehensive list of all safety metrics that it tracks, a summary of its performance on each metric for the past five years, and the results of all SED audits, internal audits, and external audits related to safety. The Commission should also direct its staff to prepare a comprehensive list of all safety-related reporting requirements and provide a public index of PG&E's filings pursuant to those requirements, for the past five years. ED should send these documents to the service list for this proceeding." (p.15)

Network agrees with Joint CCAs: "The Commission should also ensure all information and data related to supply, distribution, and safety within PG&E's transmission and distribution service territory are publicly accessible." (p.10)

Network agrees with Comments of Engineers and Scientists of California: " It is imperative for PG&E management to consult more actively with the experienced engineers and technical professionals who do the day-to-day work of running the system. Their knowledge is necessary to solving the significant immediate public safety issues that confront PG&E, for example, in the determination of a wildfire safety plan that protects the public and is sensitive to the different elements of the utility system." (p.6)

Network agrees with Comments of the City and County of San Francisco: "But the catastrophic problems of the last decade, including the San Bruno gas explosion and the multiple wildfires of the

last several years, are categorically different and cannot be ignored. “ p.1 “Although PG&E obviously want to be a safe company, PG&E’s commitment to safety competes with its commitment to maximizing financial performance, protecting its monopoly business, and promoting its public image.” (p.1)

Above references to other Parties Comments support the need for discovery, and hearings on smart meter health, safety, and environmental impacts, to prioritize delivery of safe, reliable gas and electric service at reasonable rates.

Dated: February 22, 2019 at Sebastopol, California.

Respectfully submitted,

/s/ _____
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