



April 20, 2021

Ms. Caroline Thomas Jacobs
Director, Wildfire Safety Division
California Public Utilities Commission, Wildfire Safety Division
505 Van Ness Avenue
San Francisco, CA 94102

Transmittal Via E-mail: wildfiresafetydivision@cpuc.ca.gov & Service List of R.18-10-007

RE: Reply Comments of the Rural County Representatives of California on the SMJU 2021 Wildfire Mitigation Plan Updates

Dear Director Thomas Jacobs:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to reply to public comments on the Small and Multi-Jurisdictional Utility (SMJU) 2021 updates of their respective Wildfire Mitigation Plans (WMPs or Plans). RCRC is an association of thirty-seven rural California counties, and our Board of Directors is comprised of elected supervisors from each member county. RCRC has been a formal party to the *Order Instituting Rulemaking to Implement Electricity Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018)* since March 21, 2019.

Safeguarding California's residents from future harm resulting from a utility-caused wildfire event is one of RCRC's public policy goals. California's communities have experienced great financial hardships in attempting to recover from catastrophic wildfire events and in mitigating the risk of consequences of those events, including implementing home hardening measures, maintaining defensible space, and suffering economic (as well as health-related) fallout from proactive de-energization events, also known as Public Safety Power Shutoffs (PSPS). While we appreciate the role that surgical, well-implemented PSPS events can play in reducing the risk of utility-caused wildfire, we believe that the need for conducting PSPS events should rapidly diminish over the next few years as utilities make significant improvements to their electrical systems. In the case of SMJUs, we appreciate that PSPS events have generally been rare compared to the large investor-owned utilities (IOUs).

Green Power Institute (GPI) correctly points out that “SMJU wildfire risk should not be underestimated due to their small territories and few risk driver/ignition events” and that their risk modeling is limited by available data.¹ Moreover, “GPI recommends that the SMJUs explain how they are addressing their outage and ignition-risk-driver data shortage issue in the next annual update. They should also provide a summary of how the data limitations have limited their ability to accurately model probability of ignition and overall wildfire risk, and how they intend to overcome these hurdles. All SMJUs should also provide a summary of risk model vetting and validation outcomes, including ability to predict past outage and or ignition events.”² On the whole, we believe the California Public Utilities Commission (CPUC) and the Wildfire Safety Division (WSD) must comprehensively examine technology models and inputs being utilized to model risk, and should do so in consultation with competent, neutral third parties in the scientific community in an open public forum.

Similarly, we too have found widespread cost discrepancies for complementary programs across all utilities, large and small. CalAdvocates notes that, “While the WSD does not approve the costs of the WMPs, the WSD should examine these cost disparities in an effort to help all utilities reduce wildfire risks in a cost-effective manner and with realistic forecasts.”³ Given this phenomenon, we urge the WSD to participate in future utility cost recovery proceedings to help the CPUC reconcile these wide-ranging cost discrepancies and protect all ratepayers from potentially unjustified price differentials.

As noted by GPI, like the large IOUs the SMJUs are installing Covered Conductor (CC) as a primary mitigation strategy to reduce wildfire risk as well as the need to conduct a PSPS event.⁴ However, “While all IOUs and SMJUs appear to tout it as a PSPS mitigation method there has yet to be a Utility that has altered a PSPS threshold on account of CC installations.”⁵ RCRC urges the WSD to investigate the relationship of system hardening measure and PSPS events risk thresholds further. Just as public workshops are needed to vet technology models and their inputs, more public scrutiny is needed to evaluate PSPS events thresholds across all utilities. CalAdvocates also points out that wind speed thresholds vary widely across all the SMJUs.⁶

RCRC appreciates GPI’s call to improve the sustainability of utilities’ vegetation management programs, which — when done more effectively — may also reduce ratepayer impacts. Specifically, we echo the concern of dead and dry fuels building up in in fire prone communities.⁷ We would also suggest that the experience of the California

¹ *Comments of the Green Power Institute on the 2021 Wildfire Mitigation Plans of the SMJUs*, page 4.

² *GPI*, page 6.

³ *Comments of the Public Advocates Office on the 2021 Wildfire Mitigation Plan Updates of the Small and Multijurisdictional Electric Utilities*, page 10.

⁴ *GPI*, page 20.

⁵ *Ibid*, page 21.

⁶ *CalAdvocates*, page 6.

⁷ *GPI*, page 28.

Department of Forestry and Fire Protection would be particularly valuable in analyzing vegetation management programs not only at the individual utility level, but also potentially standardizing best practices across service territories to incorporate into vegetation management or enhanced vegetation management programs.

Liberty Utilities

We share CalAdvocates concerns with Liberty's lack of Quality Assurance (QA) and Quality Control (QC) procedures for asset and grid hardening inspections.⁸ With Liberty's heavy reliance on outside contractors in a wide variety of areas, including vegetation management, it is vital they have robust internal controls in place. We wholeheartedly support CalAdvocates recommendation to for Liberty to implement QA/QC processes by the end of 2021 and file quarterly reports on these process improvements and contractor oversight.⁹

GPI points out the sparse details contained in Liberty's WMP Update to achieve vegetation clearances around conductors and equipment.¹⁰ "The combined lack of detail and prioritization for performing vegetation management work on HFTD distribution lines, relatively few HFTD distribution vegetation inspections, and data showing vegetation contact as one of their leading causes of HFTD distribution outages is concerning. GPI recommends performing a detailed audit of Liberty's HFTD distribution vegetation management inspection and clearance work plan to ensure they are adequately addressing vegetation-related risk drivers in HFTD prior to fire season."¹¹ We support GPI's recommendation, which is consistent with the need to improve Liberty's QA/QC protocols. Implementing both of these recommendations will help improve vegetation management practices for Liberty on a forward-going basis.

Lastly, GPI points out that Liberty has completed many fuse replacements in low-fire risk zones; we concur that Liberty should 1) explain why this occurred, and, 2) clarify their plans going forward to prioritize fuse replacement in high and very high risk rated zones.¹²

PacifiCorp

CalAdvocates argues, "WSD should require PacifiCorp to provide greater detail regarding distribution automatic recloser operations, grid topology improvements, and system automation projects. Filling these gaps is necessary to ensure that PacifiCorp's WMP achieves the goal of minimizing wildfire risk and de-energization events."¹³ According to GPI, "PacifiCorp relies on remote sensing and sensors to determine fuel conditions (PacifiCorp 2021 WMP Update, p. 26). All other SMJU and IOUs use a combination of fuel sampling and sensor/remote sensing data to determine fuel moisture. For example,

⁸ *CalAdvocates*, page 17.

⁹ *Ibid*, page 18.

¹⁰ *GPI*, page 25.

¹¹ *Ibid*, page 25.

¹² *Ibid*, page 19-20.

¹³ *CalAdvocates*, page 20.

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Liberty has a weekly fuel moisture sampling program (Liberty 2021 WMP Update, p. 27). PacifiCorp should explain if and why it does not require a fuel sampling program to calibrate and validate sensor information and inform fire probability and consequence modeling.¹⁴ We share the desire for greater detail and, therefore, scrutiny on these measures, in addition to PacifiCorp's slow system hardening progress in 2020.¹⁵ We also share the concern that PacifiCorp may not be undertaking mitigation activities until fire season has begun.¹⁶ This is obviously problematic.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", with a stylized flourish at the end.

STACI HEATON
Acting Vice President of Governmental Affairs

cc: California Department of Forestry and Fire Protection
(CALFIREUtilityFireMitigationUnit@fire.ca.gov)

¹⁴ *GPI*, page 11.

¹⁵ *CalAdvocates*, page 22.

¹⁶ *GPI*, page 24.