

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

*Order Instituting Rulemaking to Implement  
Electricity Utility Wildfire Mitigation  
Plans Pursuant to Senate Bill 901 (2018)*

Rulemaking 18-10-007  
(Filed October 25, 2018)

**RURAL COUNTY REPRESENTATIVES OF CALIFORNIA COMMENTS  
PROPOSED DECISION OF ALJs THOMAS AND ALLEN ON PACIFIC  
GAS AND ELECTRIC COMPANY'S 2019 WILDFIRE MITIGATION  
PLAN PURSUANT TO SENATE BILL 901**

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Dated: May 13, 2019

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In accordance with Rule 6.2 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure (“Rules”), the Rural County Representatives of California (RCRC) respectfully submits these comments to the Order Instituting Rulemaking 18-10-007 (“Rulemaking”).

**INTRODUCTION AND BACKGROUND INFORMATION**

On behalf of the Rural County Representatives of California (RCRC), I am pleased to comment on *Order Instituting Rulemaking to Implement Electricity Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018)* related to the Decision on Pacific Gas and Electric Company’s 2019 Wildfire Mitigation Plan Pursuant to Senate Bill 901. RCRC received party status via written ruling on March 21, 2019. RCRC is an association of thirty-six rural California counties, and its Board of Directors is comprised of elected supervisors from those member counties.

RCRC has a broad interest in the implementation of Senate Bill 901 and minimizing the risks of catastrophic wildfire. Federal, state, and local government partners have been actively engaged to undertake coordination efforts across jurisdictional lines to protect life and property from preventable wildfire events. Local governments and residents have undergone great financial hardships with recovery efforts after a catastrophic wildfire event and with preventative efforts of home hardening and defensible space. We appreciate the work the California Public Utilities Commission (CPUC) has undertaken thus far to ensure that 2019 Wildfire Mitigation Plans (WMPs) can be approved in advance of fire season, while understanding that much more refinement needs to be taken into account for future WMPs. Successful WMPs will be dynamic, continuously evolving documents that should provide robust metrics to understand tangible efforts to reduce wildfire and limit impacts on ratepayers. Successful implementation of Pacific Gas and Electric's (PG&E's) WMP is of particular importance to RCRC because they serve the vast majority of our membership.

RCRC offers comments for the respective categories outlined in the Scoping Memo relevant to our member counties below.

## **OVERVIEW OF PG&E'S WILDFIRE MITIGATION PLAN**

We agree with the decision to require follow-up activity for PG&E's 2019 WMP and future plans. It is appropriate that the CPUC recognize the importance that stakeholders play in coordinating resources with IOUs, such as properly-trained labor to undertake vegetation management issues, and how important sharing real-time risk analysis is with communities and first responders.

We are concerned that PG&E's recent bankruptcy filing may hinder their efforts to prepare for the upcoming fire season and conduct wildfire prevention activities to reduce wildfire ignitions. We respectfully request the CPUC closely monitor PG&E to ensure they act responsibly to the utility's more than five million customers and not place them at a greater risk of peril from corporate malfeasance. We also recommend that PG&E work with local agencies, both governmental such as county governments and non-governmental such as fire safe councils, to help interface with members of communities at risk in order to help with the private access issues they repeatedly assert are a hindrance to carrying out their WMPs.

## **INSPECTION AND MAINTENANCE**

The Office of Safety Advocates (OSA) recommends PG&E investigate unique topography within Tier 2 and Tier 3 high fire risk areas to develop targeted enhanced inspections<sup>1</sup>. We believe this is a good approach and should be a requirement adopted by the CPUC in future WMPs. The risk that high wind corridors, mountain ridges and canyons pose should be mitigated to the fullest extent and be given priority upgrades.

We further appreciate requiring IOUs to explain the cost increase in inspections and how they complied with pre-existing General Orders and regulations. In its next General Rate Case (GRC) Proceeding, IOUs—PG&E in particular—should have to demonstrate how their current inspections meet existing requirements, and clearly distinguish how WMP inspections are value-added activities to reduce catastrophic wildfire.

## **SYSTEM HARDENING**

Vegetation contact with conductors is the most significant risk driver and cause of ignition for PG&E. Clearly PG&E should more proactively underground their overhead distribution lines in Tier 2 and Tier 3 High Fire Threat Districts (HFTDs). We believe undergrounding is an underutilized form of system hardening, particularly in high fire threat communities with limited ingress/egress. RCRC, however, appreciates the intent of PG&E to procure an evacuation study for high fire risk communities in their WMP. Wildfire emergency plans that would assess egress risk methodology at a granular level could alleviate traffic bottlenecks and improve evacuation efforts during a wildfire.

## **VEGETATION MANAGEMENT PLAN**

Healthy forests and vegetation management is key for California's long-term ability to sequester carbon and meet greenhouse gas emission goals. Utilities are a key partner in a statewide effort to combat the lingering effects of widespread tree mortality after a five-year drought. Overgrown vegetation and dead or dying trees is one of PG&E's biggest threats to its distribution lines that may ignite wildfire. Enhanced vegetation management and removal of dead and dying trees should remain a priority solution to protect communities from the catastrophic environmental

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<sup>1</sup> Page 10, Decision on Pacific Gas and Electric Company's 2019 Wildfire Mitigation Plan Pursuant to Senate Bill 901

effects of wildfire, like poor air and water quality, and loss of habitat. In areas where undergrounding is not feasible, vegetation should be completely removed around these conductors, rather than trimmed back where later regrowth brings the wildfire threat back with it. While we commend PG&E for the work they have done to date in high hazard tree mortality zones, RCRC is concerned with PG&E's ability to increase the scope of work and pace of increased vegetation management in future years, due in part to PG&E's pending bankruptcy, and due to a labor shortage of qualified registered professional foresters. We respectfully request the CPUC to closely monitor vegetation management actions taken in HFTDs.

## **DE-ENERGIZATION**

RCRC is also participating in the *Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions* and was granted party status via written ruling on March 18, 2019. RCRC strongly agrees that WMPs should have to comply with any changes or procedures adopted in the De-Energization Rulemaking 18-12-005. Future WMPs should incorporate the robust rulemaking orders expected from the De-Energization Rulemaking into the WMPs.

Based on the experience of member counties during 2018 Public Safety Power Shut-off (PSPS) events and the information provided by PG&E's WMP, the objectives of the PSPS are unsatisfactory. According to PG&E, 52% of their service territory includes Tier 2 and Tier 3 fire-threat areas, yet they plan to notify all 5.4 million customers they may experience planned PSPS. This broad-based alert demonstrates their imperviousness and widespread naïveté of their customers on their circuits. PG&E must deploy strategic sectionalization of their grid to separate key community service facilities, such as police and fire stations, water treatment facilities, telecommunications, schools and vital businesses that provide food or fuel. Improved sectionalization will mitigate interruptions to the community and reduce negative consequences on the local economy.

Rural communities have vulnerable communities outside of medical baseline customers and must be served with notices prior to a power shut-off. Rural counties are home to a large elderly population that may be disabled or have limited motility. Further, rural counties are significantly disadvantaged by inadequate telecommunications coverage, including large swaths of underserved and unserved broadband connectivity. The 2018 Camp Fire is the deadliest fire in

California's history—86 people lost their lives, most of which were elderly—and telecommunications in Butte County went completely dark during the early stages of the fire. There must be redundancies in communications efforts to assist an elderly, rural population that is heavily reliant upon landlines not only during emergencies, but also during emergency planning and proactive events such as PSPS that could escalate into an emergency situation.

We appreciate the acknowledgement of PG&E to create Resilience Zones, which should aid fire-prone communities with services during power shut-offs. We encourage all IOUs to employ similar programs and to further refine these Resilience Zones with better sectionalization of the grid for improved outcomes during PSPS events. PSPS events are most often accompanied during times of high heat and low humidity. This adds to potential health and safety hazards local governments would have to grapple with should an IOU follow through with de-energization of their lines. Rural communities without power may have no access to pumped water, for example. RCRC continues to believe that de-energizing power lines should be a last resort.

## **SITUATIONAL AWARENESS**

RCRC is encouraged by the increase in cameras and weather stations PG&E is adding to gain better situational awareness, and believes this should have been a higher priority years ago. PG&E must have better data if it hopes to employ an adept PSPS program that could affect millions of customers. We share the concern, however, that it is unclear to what extent PG&E will share the data it collects with first responders and local governments. Real-time data is imperative to increase public safety and emergency response, including timely evacuations. We agree with the recommendation that that a Tier 1 Advice Letter is necessary to determine how PG&E intends to share its situational awareness information and analysis with stakeholders, such as first responders and local decision-makers. Clearly articulated and effective communication with local governments will help save lives during emergencies.

## **EMERGENCY PREPAREDNESS OUTREACH AND RESPONSE**

As previously stated, rural communities are significantly disadvantaged by underserved broadband and insufficient telecommunications coverage. Redundant communication structures are key for emergency preparedness outreach and response for customers and stakeholders alike.

Communication with local governments are essential for effective outreach in threatened communities.

## **METRICS, MONITORING AND REPORTING**

Senate Bill 901 was a comprehensive suite of actions to not only return California's forests to a natural, more resilient, fire-resistant state, but it also mandated specific action on electric corporations to reduce wildfire ignitions caused by their equipment. Without robust goals and metrics, the WMP amounts to a punch-list of ratepayer funded activities that IOUs believe will stave off liability, not prevent catastrophic wildfire events. We agree future WMPs must have markedly improved metrics, measurably reducing risks without redundancy for ratepayers. There should be consistency amongst the IOUs with regard to metrics, monitoring and reporting for better transparency and accountability.

## **CONCLUSION**

RCRC's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, Rural County Representatives of California respectfully requests that the CPUC grant this Motion for Party Status filing and accept RCRC's comments for filing.

Dated: May 13, 2019

Respectfully submitted,

/s/ [Your name]

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