



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

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

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

**COMMENTS ON WILDFIRE MITIGATION PLANS BY THE COUNTY
OF LOS ANGELES**

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Dated: March 14, 2019

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INTRODUCTION

Los Angeles County (County) and its residents have suffered substantial impacts and damages as a result of the Woolsey Fire and appreciates the opportunity to participate in the rulemaking proceeding before this Commission. The County submits the following comments on the proposed wildfire mitigation plan (WMP) submitted by Southern California Edison (SCE). The Assigned Commissioner's Scoping Memo and Ruling indicates that Concurrent opening briefs/comments were due on March 22, 2019. The County was informed by the PUC's Public Advisor that the opening brief/comments were due on March 22, 2019. See email attached as Exhibit A.

1. MEANING OF PLAN APPROVAL

The Commission approval of the wildfire mitigation plans satisfies the requirement under PUC§ 8386 and functions as a method in which utility companies can be held accountable. The approval by the Commission creates clarity on what is deemed an applicable plan, putting the utilities on notice as to how they are expected to perform their duties and responsibilities when trying to avoid and mitigate wildfire emergencies. Approval of the plan does not guarantee cost recovery, nor does it act as a safe harbor against future enforcement action.

2. OVERALL OBJECTIVES AND STRATEGIES

SCE PLAN 2.3.3: OVERVIEW OF PREVENTIVE STRATEGIES AND PROGRAMS- Within The Next Five Years

SCE's WMP lacks specifics on where these system upgrades will take place. Most appear to be system hardening and monitoring. In general, mitigation plans may reduce system failures but do little to address the issues of providing power to the public in the HFRA during extreme wind events.

3. RISK ANALYSIS AND RISK DRIVERS

SCE PLAN 3.3.1.4 VEGETATION MANAGEMENT PLAN 3.3.1. 4.1.1 RAMP Compliance Control CM1-Vegetation Management

A benefit and risk analysis of current state laws and regulations follow by SCE needs further study to validate the effectiveness of current laws and regulations. The PUC should do further research to ensure that the laws regulating power companies are effective in mitigating fire risk. Currently SCE does not model the impacts of vegetation management activities in these mitigation plan drivers, outcomes or consequences. In addition, GIS mapping of fire starts and spread on sites belonging to SCE would benefit the Los Angeles County Fire Department in assisting with their decision making.

3.3.1.6.1 RAMP Mitigation M3 – Public Safety Power Shutoff Protocol and Support Functions

While this practice may shift the responsibility and liability from the utility to the individual, the demand for power in the HFRA will not diminish. The use of small portable generators, lighting, and home electrical devices may increase the possibility of single point ignitions within these areas during high risk times. The “message” that is put out to the public needs to be clear and reviewed by Los Angeles County Fire Department so that they can help mitigate any unexpected consequences from less reliable and unmaintained home-use generators.

Other unexpected consequences may include: lack of 911 service, medical care devices that need power creating increased call volume, evacuation of residents in darkness, preparing/securing your home during an evacuation without power, and failure of water system and pumps that rely on electrical power (this section is closely related to Section 4.6.2 Tactical and strategic decision making protocol for initiating a PSPS/de-energization).

SCE PLAN 3.2.1 RISK TRANCHING AND PRIORITIZATION
3.2.1.3 Risk Outcomes and Consequences

This WMP lacks specific information as it relates to Los Angeles County weather and fire data. It only speaks to Red Flag Warnings and does not give details on Fire Weather watches and ignitions. More detailed information is necessary to determine when the "public safety power shutoff" would be most effective in Los Angeles County.

4. WILDFIRE PREVENTION STRATEGY AND PROGRAMS

SCE PLAN 3.31 WMP ELEMENTS IDENTIFIED IN RAMP AND 4.4.3
ADDITIONAL ACTIVITIES IN HFRA

3.3.1.4.2 RAMP Mitigation M5 – Expanded Vegetation Management and 4.4.3.1 Hazard Tree Removals(Activity VM-1)

Coordination with local government, fire agencies and fire safe councils would provide project understanding and can greatly increase the effectiveness of the program.

4.4.3.2 Expanded Pole Brushing (Activity VM-2) and 4.4.3.3 Expanded Clearance Distances at Time of Maintenance (Activity VM-3)

The initiation of Fire Hazard Mitigation Projects under power lines influence zones should be encouraged. The reduction of smoke plume and ember production could significantly reduce the possibility of power line arcing. The upcoming California Vegetation Treatment Program (VTP) will be an excellent roadmap for fire hazard reduction project planning and implementation.

SCE PLAN 4.4.2 EXISTING VEGETATION MANAGEMENT PROGRAMS
4.4.2.4 Vegetation Management Program Re-Design

Currently the Vegetation Management Program is a prescription followed by the utilities based on PRC 4291, 4292 and 4293 and any RC reliability standard FAC-003, GO 95 Rule 35. These codes have not been studied and or validated in this mitigation plan. A program re-design based off of this current model may lead to insufficient or insignificant change. Fire modeling should be a part of the current evaluation and future program re-design. More research is needed to determine if current PRC's are effective in ignition prevention and fire mitigation

4.5.2 Additional Action Taken in HFRA

The addition of the County of Los Angeles Fire Department Forestry Division and Daily Fire Danger Reports and coordination with the local fire agency, Fire Danger Operating Plan, will greatly enhanced SCE's capabilities to estimate wildfire potential.

5. EMERGENCY PREPAREDNESS, OUTREACH AND RESPONSE

SCE PLAN 4.4.2.2 Supplemental Vegetation Inspections in the HFRA

Coordination with local fire agencies and would provide accountability and can greatly increase the effectiveness of the program. The current "Operation Santa Ana Inspection Program" is an excellent example; expansion of "Operation Santa Ana" to all fire agencies in the SCE service area is recommended.

6. PERFORMANCE METRICS AND MONITORING

The County does not have comments at this time.

7. RECOMMENDATIONS FOR FUTURE WMPS

The current mitigation plan appears to primarily address infrastructure improvements, such as system hardening, and use of technology and monitoring of weather conditions to reduce fire risk. This additional Situational Awareness may provide decision makers with real time information to assist in decision making but does little to control or mitigate the spread of fires if

ignition occurs. Some of the utility related topics should be evaluated further by professionals in the utilities industry to further explain the fire related mitigations.

8. OTHER ISSUES

WMP's should be signed and certified by a senior executive officer within the utility company. This would assist in ensuring that all involved would understand their obligations and duties to help reduce the risk of wildfire emergencies.

DATED: March 14, 2019

Respectfully Submitted,

/s/J. Scott Kuhn

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EXHIBIT A

Vanessa Miranda

From: Vanessa Miranda
Sent: Thursday, March 14, 2019 4:25 PM
To: Vanessa Miranda
Subject: FW: Comments on Wildfire Mitigation Plans

From: Public.advisor [<mailto:Public.advisor@cpuc.ca.gov>]
Sent: Thursday, March 14, 2019 9:12 AM
To: Vanessa Miranda
Subject: RE: Comments on Wildfire Mitigation Plans

Hello

The ALJ's December 7, 2018, Scoping Memo and Ruling for R1810007, <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M247/K361/247361440.PDF> shows that comments are due on the below dates:

- Mar. 13, 2019: Intervenor comments filed and served
- Mar. 22, 2019: Concurrent opening briefs/comments
- Mar. 22, 2019: Utility reply comments filed and served
- Mar. 27, 2019: Concurrent reply briefs/comments

Useful information on the Utility Wildfire Mitigation Plans (SB 901) can be found on <http://cpuc.ca.gov/SB901/>, and <https://apps.cpuc.ca.gov/apex/f?p=401:56:0::NO> . Please note that when you open the second link it has tabs for Documents, Rulings and Decisions and a link to the Service List.

Our 10/25/18 Press Release, <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M235/K696/235696447.PDF> notes that this is an accelerated proceeding *"proceeding may move very quickly, with either shortened deadlines or fewer rounds of input. All parties should be prepared to act on short deadlines so the CPUC can meet the legislative mandate, consistent with due process"*

I hope this helps.

Public Advisor's Office
California Public Utilities Commission
1-866-849-8390

From: Vanessa Miranda <VMiranda@counsel.lacounty.gov>
Sent: Wednesday, March 13, 2019 2:15 PM
To: Public.advisor <Public.advisor@cpuc.ca.gov>
Subject: Re: Comments on Wildfire Mitigation Plans

Good afternoon,

I was hoping to get some clarification on the due dates for comments on the WMP's. My office (Office of the County Counsel, County of Los Angeles) was recently added as a party to the proceedings (R.18-10-007). I noticed both the date of today and 3/22. Please feel free to call me directly if that is easier. Thank you in advance!

Vanessa Miranda

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