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

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

Rulemaking R.18-10-007

**COMMENTS OF THE GREEN POWER INSTITUTE  
ON THE WILDFIRE MITIGATION PLANS OF THE IOUS**

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## **COMMENTS OF THE GREEN POWER INSTITUTE ON THE WILDFIRE MITIGATION PLANS OF THE IOUS**

Pursuant to the December 7, 2018, Assigned Commissioner’s Scoping Memo and Ruling, and applying the Remaining Schedule without Hearings (Scoping Memo and Ruling, page 5), as ordered at the February 26, 2019, PHC, in Proceeding R-18-10-007, the **Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018)**, the Green Power Institute, the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security (GPI), provides these Comments of the Green Power Institute on the Wildfire Mitigation Plans of the IOUs. Our comments follow the common comment outline that has been established by the parties to this proceeding. We limit our comments to the Wildfire Mitigation Plans (WMP) of the large IOUs, due to limited resources on our part.

### **1. Meaning of Plan Approval**

The initial session of the February 26-27, 2019, workshop in the WMP proceeding was dedicated to the topic of this first section of the common outline: What is the meaning of Commission approval of the WMPs of the LSEs? It was clear from the panelists’ opening remarks that there is a fundamental difference of opinion about one issue in particular. The IOU representatives, who spoke first, asserted that approval of their plans should automatically guarantee cost recovery for activities that are included in the plans. They emphasized this is the most essential element of the approval process, as far as they were concerned. The consumer advocates countered that in fact cost recovery is a matter left to the general rate cases of the IOUs, and is in fact expressly excluded from the WMP process by SB 901.

The GPI believes that the development and approval of the wildfire mitigation plans should be treated as a long-term planning exercise, much in the spirit of the IRP process that is currently nearing the completion of the initial round of its application in R.16-02-

007. Approval of the individual IRPs of the LSEs does not guarantee cost recovery for any actions included in the plans, although it can authorize specific procurements that are included in the plans. The same approach should be applied to the WMPs. Approval of the WMPs should not guarantee cost recovery for any or all actions included in the plans, but there is no reason why specific funding authorizations should not be able to be considered within the context of approval of the overall plan. If a specific authorization is sought, it should be explicit and well defined in scope in the WMP. As far as we can tell, no such authorizations were requested in the February 6, 2019, WMP filings.

The IOUs' WMPs include plans to conduct a variety of fire-safe activities over the next several years, including conducting safety inspections of powerlines and power systems, installing remote monitoring equipment, vegetation management along rights-of-ways, replacement of conventional conductors with insulated, hardened conductors, and increased community outreach and education. The GPI believes that while the approval of the plans does not automatically guarantee full cost recovery for these activities, it does provide the framework for the utilities to pursue the activities, with their costs to be subjected to the prudence tests that are standard for all normally approved utility operations during general rate cases.

## **2. Overall Objectives and Strategies**

As the enabling legislation, SB 901, makes clear, the overall objective of having the utilities produce annual wildfire mitigation plans is to decrease the rate of occurrence and the extent of damage associated with wildfires in California. Wildfires have always been a component of California forests and woodlands, and the problems associated with wildfires are increasing as a result of both climate change, and population growth and migration. The overall objectives of the WMPs should be to reduce electric-system-caused ignitions, and to make the entire systems more resilient to the effects of fire, regardless of the cause and location of ignition. Ultimately, the effectiveness of the plans will be judged against the extent of fire-related losses in the utilities' service territories, including lives lost and property damage.

One of the strategies that the utilities are increasingly considering applying in an effort to prevent ignitions is to de-energize portions of their systems during periods when red-flag fire conditions are declared. While the details of the de-energization process are being handled in a separate proceeding at this Commission, R.18-12-005, the strategy of whether and when to use the technique is very much a part of the WMPs. As part of each utility's community outreach programs (see section 5 below), it is crucial that a component be added, especially in tier 2 and tier 3 fire-hazard regions, about the de-energization plans that the utility is developing. In particular, planning needs to take place regarding all essential services that need to be powered during periods of utility-ordered de-energization, which can last several days once they are declared.

### **3. Risk Analysis and Risk Drivers**

The risk analyses proposed by the IOUs in their WMPs are geared mainly to understanding the causes of ignitions, and decreasing the rate of ignitions by their electric systems. The GPI agrees that this should be the primary focus of the risk analyses that are conducted, however we believe that the IOUs need to go further than they do in taking post-ignition factors into account. As far as we can tell the IOUs go no further with respect to considering offsite fire-risk factors than adopting the classification of California forestlands done by CalFire with emphasis placed on fire-hazard categories tier 2 and tier 3 forestlands. In our opinion the utilities need to start working with state and federal agencies and interest groups to take a more granular approach to fire-risk assessment, recognizing that in addition to overall forestry-health conditions in an area, which is what drives the CalFire fire-hazard classification system, fire behavior is also strongly influenced by geographic and weather factors, which can vary considerably within a given forest hazard-category region.

Taking climatic and geographic factors into account in risk analysis not only has the potential to better inform the ignition-risk analytical work that is proposed in the WMPs of the IOUs, it also can provide information that is useful to the managers of lands in proximity to the powerline rights-of-way. What we are arguing for is not just more

collaboration between the IOUs and CalFire, but a more *two-way* collaboration. In order to carry their share of the partnership, it might very well require the IOUs to obtain additional expertise in wildfire behavior and forestry in general. In our opinion it is time to extend the fire-risk assessments of the IOUs beyond the issue of ignition, to a consideration of fire propagation beyond the utility rights-of-way.

While the risk analyses proposed in the WMPs are properly focused on the issue of electric-system-caused ignitions, the GPI believes that the utilities also need to consider the risks to their systems of wildfires that are initiated by causes not related to the electricity system. Wildfire preparedness, which is an important component of wildfire mitigation, goes beyond the issue of ignition to the issues of recovery and restoration of service in the event of wildfire, regardless of the cause of the fire. We believe that the utilities need to devote more time and effort in their risk analyses to matters of system protection and restoration in the event that wildfires do occur.

#### **4. Wildfire Prevention Strategy and Programs**

##### *Vegetation Management Programs*

The vegetation management programs proposed by the IOUs are geared to preventing ignitions, both by keeping vegetation away from where powerlines can fall, and by removing tall trees that could fall on powerlines. Our concern is that placing virtually all of their concern on ignition is too narrow a focus. Ignition is just the first step in wildfire propagation. Mitigating wildfires requires treating the whole of the problem, from ignition to propagation to consequences. We acknowledge that the IOUs have direct jurisdiction only over their right-of-ways. Nevertheless the conditions of the lands adjacent to the rights-of-way have enormous implications for what happens when an ignition does occur, or when a wildfire sweeps through a powerline right-of-way.

During the February 27 workshop session on vegetation management the IOUs all described collaborative efforts with landowners and public agencies with respect to developing and executing their vegetation management plans. As we discussed in item

no. 3 above, the collaboration needs to become more two-way, with utility experts conveying their concerns and issues about offsite conditions back to the forest managers, as well as receiving information from them.

One issue that particularly concerns the GPI is the complete absence of information in the IOUs' WMPs about the disposition of the biomass material that is removed by utility and contractor crews in their vegetation management programs. Piled residues that are left in place for long periods of time become significant fire hazards in their own rights.

Moreover, in our opinion there is an obvious nexus between the generation and disposition of these residues and the California biomass industry that ought to be embraced. The value of doing so lies in public relations, customer and neighboring-landowner education, and presenting a high-profile example for forestland management in general in California.

We acknowledge that a good deal of the biomass that is cleared during right-of-way vegetation management operations is the property of the landowner, not the utility, and that the fastest way for the management crews to do their work is simply to pile the cleared biomass and move on. Unfortunately, the legacy of this treatment is that in many cases these piles of biomass are left in the field for long periods of time, where they certainly exacerbate the propagation of wildfire, even if their trimming has reduced the ignition risk under the wires. Thus, it is clearly in the utilities' own interest to do whatever they can to facilitate the removal of these piles, even given that the decision making regarding their disposition is not theirs alone. We encourage the utilities to develop programs and incentives to motivate the landowners whose vegetation is being cleared to send the removed material to its highest-valued beneficial use, which in many cases will be as fuel for the biomass industry. In addition to arranging for the clearing, the utilities ought to offer full service options in which the material is fully removed from the site and treated for beneficial use, to the convenience of both the landowner and the utility performing the vegetation management operation.

In discussing this issue with the vegetation management panel at the February 27 workshop, it became clear that the utilities do not consider the removal and beneficial use

of vegetation management residues to be a priority matter. In the opinion of the GPI, this needs to change, particularly in view of the fact that the residues, when piled and left in place near the rights-of-way, become significant fire hazards in their own rights. Future rounds of the WMPs should include a plan for the removal and beneficial use of residues in their vegetation management plans.

SDG&E representatives on the workshop panel described recent efforts to cooperate with a project-in-development that failed to come to fruition. In fact, there has not been a new, large biomass generator built in the state in the last decade, and the existing industry in the state is in decline. Our strong recommendation is that the utilities should concentrate their efforts on supporting the existing biomass facilities, rather than trying to spur new ones, at least in the near term.

## **5. Emergency Preparedness, Outreach and Response**

The public has a huge stake in the efforts of the utilities to reduce the risks of wildfires in their areas, and to restore essential services in the event that fire does occur. We believe that the utilities need to go further than they do in their WMPs in the categories of emergency preparedness, outreach and response. Moreover, these activities should not be restricted to tier 2 and tier 3 areas. Some of California's most destructive wildfires, including the Tubbs fire, have occurred outside of these areas.

One area in which community outreach and education is particularly needed is in connection with the use of de-energizations during red-flag fire conditions. At this point in time there is widespread public misunderstanding and suspicion surrounding the use of de-energizations, as well as confusion regarding how to maintain essential services during the sometimes extended blackouts. Overcoming this problem will require a well-designed and executed public outreach program. This effort will require a good deal more than simply public relations. Genuine interaction with and participation on the part of the public is necessary. These efforts can be limited to specific regions of the grid that are identified candidates for de-energization.

## **6. Performance Metrics and Monitoring**

One of the issues of contention at the first session of the Feb. 26-27 workshop was the matter of what constituted the proper kind of performance metrics to be used in the WMPs. The IOUs proposed using activity-based metrics, such as number of trees cleared, or miles of powerline inspected and/or hardened. These metrics can easily be compared to the numbers proposed in the WMPs. The consumer groups favored using performance-based metrics, such as deaths and/or property damage sustained in wildfire events. These metrics can be compared to historical data.

The IOUs pointed out that there is a large measure of randomness that connects powerline right-of-way conditions and utility management activities to ultimate consequences, and that they should not be held solely responsible for offsite circumstances and occurrences over which they have little control. They are correct to an extent, but that does not negate the value of using performance-based metrics. In the opinion of the GPI, there is a place for using both types of metrics, activity-based, and performance-based, in the WMPs. There is no reason not to monitor both kinds of metrics as part of the SB 901-directed annual WMP process.

When using activity-based metrics like miles of right-of-way cleared, or miles of powerline hardened, it is not enough to simply compare the extent of the activity in question with the targets that are proposed in the WMPs, for example a given utility's WMP posits  $x$  miles of clearance, and the utility performed  $x + y$  miles of clearance, thus exceeding the target in its WMP. The problem is that the seeming achievement of the target does not provide sufficient context to understand whether there is a substantial benefit.

What is missing is a thorough analysis of the annual level of the activity that needs to be pursued in the long run in order to be able to sustainably run a safe and reliable electric system. For example, if the rights-of-way in a given region need to be cleared every five years in order to maintain them in fire-safe condition throughout the cycle, then in the long

run twenty percent of the rights-of-way in the region need to be cleared annually, which should be installed as the long-run target. Short-run targets may differ from long-run targets for any number of legitimate reasons, and when that is the case it should be discussed in the WMP.

## **7. Recommendations for Future WMPs**

The initial cycle of the SB 901-directed WMPs has been run on a very compressed basis, in an effort to make these documents relevant to the 2019 fire season. As a result, as far as we can tell although comments and party participation has been sought during the development of the plans, more often than not the subject of the party input has already been decided by the time it has been proffered, and the real value of the input is that it can be directed toward future cycles of the WMPs.

We believe that same applies to these comments. The initial round of the WMPs are statutorily required to be in effect in time for the summer, which gives the Commission less than two months to prepare and approve a decision once this round of comments are filed today, and the reply comments of the original WMP-filers are filed on March 22. We have prepared these comments with the understanding that they are probably more applicable to the next round of the process than the current round of the process.

## **Conclusion**

The ultimate test for the WMPs is whether California's electrical infrastructure can be upgraded and operated in ways that materially reduce the number of fires that the system causes, and the extent of the damage in fires that are ignited, whether by the utilities' infrastructure, or otherwise. This task is especially challenging in the face of climate change, which is increasing the fire risks and consequences for the state's forests, and population growth and migration, which is putting more people at risk in the event of fires that do occur.

The initial round of the WMPs is a promising start in pursuit of the goals for this process established by SB 901. We have identified in these comments a number of areas that future rounds of the WMPs should bolster and/or include. With respect to the conclusion of this initial round of the process, it is appropriate for the Commission to approve the WMPs with whatever revisions are deemed necessary, with the express understanding that approval does not convey automatic cost recovery for any of the actions proposed in the WMPs. Cost recovery is expressly assigned to the general rate cases by SB 901.

We recommend that the Commission adopt the positions that we have taken in these comments.

Dated March 13, 2019

Respectfully Submitted,



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