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03/13/19
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Attachment A

Appendix C: Fire Incident Data Collection Plan

Appendix C reproduces the Fire Incident Data Collection Plan in the Phase 3 Workshop Report and approved by this decision.

The attached Fire Incident Data Collection Plan includes non-substantive formatting and pagination revisions.

Fire Incident Data Collection Plan

SED details the data it recommends that electric utilities shall submit to the California Public Utilities Commission.

SED's Revised Data Collection Proposal is designed to provide information that will be useful in identifying operational and/or environmental trends relevant to fire-related events and to ensure this information is gathered, collected and reported in a simple format so as to: 1) allow data comparisons across several years and among utilities; and 2) improve regulations and/or internal utility standards to reduce the likelihood of fires.

In order to identify and assess systemic fire safety risks, SED intends to use the data to identify operational and/or environmental trends. Activities might include:

- Cross referencing the data to weather data
- Conducting a statistical analysis of the data to identify trends in the data
- Meeting with Investor Owned Utilities (IOUs) to discuss SED's statistical review of the data
- Meeting with fire agencies and Communication Infrastructure Providers (CIPs) on an as needed basis to gain more information

Once an operational and/or environmental trend is identified, additional root cause analysis may be required in order to diagnose the conditions that precipitate such results and formulate cost-effective measures to reduce systemic fire risks, SED intends to engage in one or more of the following activities:

- Conduct a cost-benefit analysis of mitigation measures with the IOUs and CIPs
- Hold meetings with one or more IOUs to discuss operational changes

- Initiate a rulemaking at the Commission to address the trend identified by SED
- Meet with CAL FIRE and other fire agencies

SED may meet with one or more IOU based upon data received at any time, at a minimum SED plans to meet with each IOU within six (6) months of receiving three years of fire data to discuss:

- The data collected
- SED's view of the data results
- The IOU's view of the data results

Furthermore, SED plans to meet with all IOUs and other key stakeholders to discuss the cost-benefit of this data collection process nine (9) months after the fifth year of submitting data. The purpose of that meeting(s) will be to review:

- The results of the data collected
- Costs associated with the data collection process
- Potential refinements to the data collection process

A. Principles

1. Any data collection proposal and subsequent data-reporting requirements adopted during R08-11-005 will be in addition to the incident-related reporting requirements to which the utilities are already subject.¹

¹ See, *Commission Resolution E-4184*, August 21, 2008. E-4184 orders electric utilities to submit reports related to any incident where a utility's facilities are involved and the incident results in property damage exceeding \$50,000, a fatality or injuries requiring in-patient hospitalization, and/or significant media attention.

2. Data should be consistent. Most fields will have either default formats or will be limited to drop down choices so that errors in data entry will be minimized.²
3. Any new fire-related reporting requirements should not be limited to fire events that occurred in “designated ‘fire-threat’ zones or districts”. Setting reporting requirements for all areas instead of for just a limited area is consistent with various existing Commission reporting requirements.³
4. Fire-related reporting requirements should be limited to events that meet the following criteria.⁴

For the purposes of the Data Collection Proposal, a reportable event is any event where utility facilities are associated with the following conditions:

- (a) A self-propagating fire of material other than electrical and/or communication facilities, and
- (b) The resulting fire traveled greater than one linear meter from the ignition point, and
- (c) The utility has knowledge that the fire occurred.

Ignition Point is the location, excluding utilities facilities, where a rapid, exothermic reaction was initiated that propagated and caused the material involved to undergo change, producing temperatures greatly in excess of ambient temperature.

5. The information reported shall be objective and factual to the best of the utility’s knowledge and shall not include speculation or attribution of fault or blame.

² The following fields would be excluded from a standard format: Notes, Facility Identification, Other Companies and Suppressing Entity.

³ See CPUC Resolution E-4184, GO 112-E, GO 165.

⁴ Fires that caused damage to utility facilities and whose ignition is not associated with utility facilities are excluded from this reporting requirement.

6. The utilities should report data in an annual report for the previous calendar year (January through December) on or before April 1 of each year.
7. The data collected is raw data that is correct to the best of the utility's knowledge at the time of submission. Confidential data submitted will be protected in accordance with California law.

B. Fire-Related Data-Reporting Requirements

SED has provided examples of how each data field should be reported in the Microsoft Excel file titled *Revised Data Collection (SED)*. The data recommended by SED for gathering, collection and reporting are:

Utility Name:	Name of utility reporting the event;
Date⁵:	Date the event started;
Time^{6 7}:	The time the event started;
Location⁸:	Latitude and longitude coordinates of the point of ignition;
Material at Origin:	Material involved in the initial fueling of the fire;
Land Use at Origin:	Nature of land use in the vicinity of the point of the fire's origin (<i>i.e.</i> , Urban, Rural ⁹);
Size:	An approximation of the fire size;

⁵ The excel spreadsheet will change the date field to the following format MM/DD/YY if a valid date is entered.

⁶ This field is only an estimate as in many cases the utility might not know the exact start time.

⁷ The excel spreadsheet uses military time as the time format. To enter times between 1:00 pm and 12:59 am, either enter the PM/ AM or enter the time in military time. Example enter 12:23AM as 12:23 AM or 00:23.

⁸ Utilities should submit data as close as possible to the origin point of the event. Data given should be at least to the thousandths decimal place (*i.e.* X.000); more accuracy should be used when the utility has that knowledge.

⁹ For the purpose of this Data Collection Proposal, "Rural" and "Urban" shall be the same definitions as those contained in General Order 165.

Suppressed by:	Who suppressed the fire;
Suppressing Agency:	If the fire was suppressed by a fire agency or agencies, insert the lead agency when one or more agency was involved;
Facility Identification:	Utility's description of the pole and/or equipment involved;
Other Companies:	Other Companies that were attached to pole in question and known to the utility. If the facilities involved were not overhead leave this field blank;
Voltage:	Nominal voltage rating of all the utility equipment and/or circuit involved in the fire, use volts.
Equipment Involved With Ignition:	The equipment that supplied the heat that ignited the reported fire;
Type:	The equipment involved in the event (overhead, padmounted or subsurface);
Outage^{10 11}:	Was there an outage involved in the event;
Outage Date:	Outage Start Date, if one is associated with the event;
Outage Time:	Outage Start Time, if one is associated with the event;
Suspected Initiating Event:	The suspected initiating event based on initial field observations;
Equipment /Facility Failure:	The specific equipment associated with the reported fire. (Only to be used if "Equipment/Facility Failure" is selected as Suspected Initiating Event);

¹⁰ For the purpose of this Data Collection Proposal, list the first outage associated with the event if multiple outages were involved.

¹¹ For the purpose of this Data Collection Proposal, exclude outages that were ordered by a governmental agency or were taken by the utility at its discretion.

Contact From Object:	The first object that contacted the Communication or Electric Facilities (Only to be used if “Contact from Object” is selected as Suspected Initiating Event);
Facility Contacted:	The first facility that was contacted by an outside object (Only to be used if “Contact from Object” is selected as Suspected Initiating Event);
Contributing Factor:	Factors that contributed to the ignition;
Notes: ¹²	An Optional Field , list additional information that could be useful when examining data.

¹² This field will be blacked out when either “Communication Facility” is selected in the “Facility Contacted” Column or “Contact Between Third Party Facility on Pole and Supply Lines” is selected from the “Suspected Initiating Event” Column.

Utility Name	Fire Start		Location				Fire		
	Date	Tim	Latitude	Longitude	Material at Origin	Land Use at Origin	Size	Suppressed by	Suppressing Agency
BVES	6/16/12	13:30	34.0497672	-118.2498957	Vegetation	Rural	Less Than .25 Acres	Customer	
Kirkwood Meadows	6/16/12	14:07	34.0497672	-118.2498957	Building	Urban	.26 - 9.99 Acres	Fire Agency	LA County
Liberty Energy	6/16/12	14:38	34.0497672	-118.2498957	Other		10 - 99 Acres	Self Extinguished	
PacifiCorp	6/16/12	14:53	34.0497672	-118.2498957			100 - 299 Acres	Unknown	
PG&E	6/16/12	14:55	34.0497672	-118.2498957			3000 - 999 Acres	Utility	
SCE	6/16/12	0:23	34.0497672	-118.2498957			1000 - 4999 Acres		
SDG&E	1/1/12	13:30					Greater than 5000 Acres		
							Less than three (3) meters of linear travel		
							Structure Only		

Utility Facility					Outage		
Facility Identification	Other Companies	Voltage (Volts)	Equipment Involved With Ignition	Type	Was There an Outage	Date	Time
P1235		12000	Capacitor Bank	Padmounted	Yes	6/16/12	13:30
Pole in rear of 32 5th Street	AT&T	21000	Conductor	Overhead	No		
P2535	None	21000	Fuse	Overhead			
Pole at intersection of Main and 4th		120	Lightning Arrestor	Subsurface			
P125646		21000	Other				
B125456		21000	Switch				
			Transformer				

Field Observations					Notes (Optional):	
Suspected Initiating Event	Equipment/Facility Failure	Contact From Object	Facility Contacted	Contributing Factor		
Contact Between Third Party Facility on Pole and Supply Lines				Weather		
Contact From Object		Animal	Communication Facility	Human Error		
Contact From Object		Balloons	Electric Facility	Unknown		
Contact From Object		Other	Pole	Outside Force		
Contact From Object		Vegetation	Pole	Other		
Contact From Object		Vehicle	Pole			
Contact From Object		Unknown	Pole			
Contamination						
Equipment/Facility Failure		Capacitor Bank				
Equipment/Facility Failure		Conductor				
Equipment/Facility Failure	Fuse					
Equipment/Facility Failure	Insulator					
Equipment/Facility Failure	Lightning Arrestor					
Equipment/Facility Failure	Pole					
Equipment/Facility Failure	Guy/Span Wire					
Equipment/Facility Failure	Other					
Equipment/Facility Failure	Protective Relay					
Equipment/Facility Failure	Crossarm					
Equipment/Facility Failure	Recloser					
Equipment/Facility Failure	Sectionalizer					
Equipment/Facility Failure	Splice/Clamp/Connector					
Equipment/Facility Failure	Switch					
Equipment/Facility Failure	Transformer					
Equipment/Facility Failure	Voltage Regulator					
Normal Operation						
Other						
Unknown						
Vandalism/Theft						
Wire-Wire Contact						

(END OF APPENDIX C)

Attachment B

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



FILED

11-26-12
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In the Matter of the Application of San Diego
Gas & Electric Company (U 902-E) for a
Permit to Construct Electric Facilities:
Cleveland National Forest Power Line
Replacement Projects

Application 12-10-009
(Filed October 17, 2012)

**PROTEST BY THE DIVISION OF RATEPAYER ADVOCATES OF
THE SAN DIEGO GAS AND ELECTRIC COMPANY'S
APPLICATION FOR A PERMIT TO CONSTRUCT THE
CLEVELAND NATIONAL FOREST POWER LINE
REPLACEMENT PROJECTS**

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November 26, 2012

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

In the Matter of the Application of San Diego Gas & Electric Company (U 902-E) for a Permit to Construct Electric Facilities: Cleveland National Forest Power Line Replacement Projects

Application 12-10-009
(Filed October 17, 2012)

**PROTEST BY THE DIVISION OF RATEPAYER ADVOCATES OF
THE SAN DIEGO GAS AND ELECTRIC COMPANY’S
APPLICATION FOR A PERMIT TO CONSTRUCT THE
CLEVELAND NATIONAL FOREST POWER LINE
REPLACEMENT PROJECTS**

I. INTRODUCTION

In accordance with General Order (G.O.) 131-D, section XII and Rule 2.6, subdivision (a),¹ the Division of Ratepayer Advocates (DRA) protests the Application of the San Diego Gas and Electric Company (SDG&E) for a Permit To Construct (PTC) the Cleveland National Forest Power Line Replacement Projects (CNF Projects).² This Protest is timely filed and served within the period of protest, which as the Application at page 10 states, began on October 27, 2012 and ends on November 26, 2012.³

As explained below, the Application does not justify the nearly one-half billion dollars costs of the CNF Projects as reasonable, consistent with the law, or in the public

¹ The term “Rule” means a regulatory provision of the California Public Utilities Commission (Commission) Rules of Practice and Procedure, unless otherwise stated.

² The term “Application” or “A.12-10-009” means the SDG&E Application filed on Oct. 17, 2012 as captioned above, unless otherwise stated.

³ In a voicemail from Allen K. Trial to Cleveland W. Lee received on November 19, 2012, SDG&E confirmed that notice of A.12-10-009 was mailed on October 27, 2012, in accordance with G.O. 131-D, sec. XI(A).

interest. DRA recommends that instead of approving *ex parte* A.12-10-009, the Commission should hold public hearings to develop a full and complete record of the law and facts, which would include (but not limited to) the grounds for this Protest as stated below.⁴

II. BACKGROUND

Generally, the CNF Projects consist of reconstructing five existing 69 kilovolt (kV) power lines and six existing 12 kV distribution lines located within and outside of the U.S. Department of Agriculture, Forest Service (FS) administered lands in the Cleveland National Forest (CNF).⁵ Specifically, the CNF Projects involve replacing 1,384 of 69 kV power line poles and 720 of 12 kV distribution line poles with weathered-steel poles at an approximately one-to-one ratio; fire hardening activities along the five existing 69 kV power lines and six existing 12 kV distribution lines; single- to double-circuit conversion for two of the five 69 kV power lines; removal of portions of two 12 kV distribution lines; and undergrounding of portions of three 12 kV distribution lines and one 69 kV power line.⁶

SDG&E claims *inter alia* that the CNF Projects are required to meet the fire safety requirements of G.O. 95.⁷ Further, they would meet the reliability requirements of the California Independent System Operator (CAISO) Tariff provisions⁸; the North American Electric Reliability Corporation (NERC); and Federal Energy Regulatory

⁴ DRA reserves the right to amend, supplement, or otherwise change the issues of law or fact to be presented at the hearing, contingent on its discovery prior thereto.

⁵ SDG&E Appl. vol. I at 4 (The CNF consists of more than 567,000 acres located in the central portion of San Diego County, California.).

⁶ *Id.* at 6 and SDG&E Appl. vol. II (Plan of Design (POD)) at 16; 23 tbl.1; and 24 tbl.2.

⁷ SDG&E Appl. vol. II POD at 6. (According to SDG&E, G.O. 95 requires corrective actions for variable (non-immediate high to low) safety and/or reliability risks (e.g., High Risk Fire Areas).).

⁸ *Id.* at 6–7 (CAISO Tariffs require operation and maintenance of facilities to avoid adverse impacts on the CAISO-Controlled Grid.).

Commission (FERC) Standards of Conduct for Transmission Providers (Order No. 717).⁹

The Application, however, does not specifically describe the fire safety or reliability problems and the related State or Federal regulatory provisions that necessitate the CNF Projects. Further, it is unexplained why and how the current State and Federal fire requirements fail to address any purported safety and reliability problems and thus justify the need for the CNF Projects.¹⁰

III. DISCUSSION

A. **SDG&E has failed to show that CNF Projects would not burden the ratepayers.**

Rule 3.1, subdivision (h) requires SDG&E to include a “statement of the proposed rates to be charged for service to be rendered by means of such construction.” The Application did not comply with this Rule, because “SDG&E is not proposing to increase rates as a result of these [CNF] Projects.”¹¹ SDG&E may seek to increase rates, however, if after the CNF Projects become operational, FERC were to deny recovery of the CNF Projects under FERC rules and regulations, as follows:

When the projects are placed in service, SDG&E will seek to recover the costs through the CAISO’s FERC-jurisdictional rates. This would occur as part of a FERC rate case covering the test period in which the projects will become operative. Costs not approved by FERC for recovery in general transmission rates may be recovered through CPUC-jurisdictional retail rates.¹²

DRA finds that most if not all of the \$418.5 million estimated cost for the CNF Projects would fall on SDG&E ratepayers. A Participating Transmission Owner’s (PTO) recovery of costs for facilities turned over to the ISO Operational Control begins with its

⁹*Id.* (FERC Order 717 defines reliability requirements for planning and operating electric systems in North America to ensure electric systems operate reliably.).

¹⁰ See SDG&E Appl. vol. I at 2–6 and vol. II at 33–35 (no specific exigencies described requiring the CNF Projects).

¹¹ SDG&E Appl. vol. I at 18.

¹² *Id.* at 19.

FERC-approved Transmission Revenue Requirement (TRR).¹³ The TRR is recovered through a combination of the ISO's Transmission Access Charge (TAC) or Wheeling Access Charge (WAC). The TAC is a charge paid by entities serving load on the transmission and distribution systems of the PTOs under the ISO's Operational Control. The TAC includes the High Voltage Access Charge (HVAC) for facilities at 200kV or above; the Transition Charge; and the Low Voltage Access Charge (LVAC) for facilities below 200kV.¹⁴ Because the CNF Projects involve 69 kV transmission lines and 12 kV distribution lines, which do not constitute HVACs, and SDG&E is the PTO serving the load on these lines, most if not all of the \$418.5 million estimated cost for the CNF Projects would fall on SDG&E ratepayers.

Accordingly, DRA respectfully urges the Commission to hold public hearings in this matter. DRA recommends that at the hearing, the Commission should order SDG&E to show the impact of the CNF Projects on ratepayers in accordance with Rule 3.1(h), because of the high probability that the CNF Projects' costs are not recoverable under FERC. DRA finds that assuming no changes to the Projects' scope and costs, such as overruns, the CNF Projects would raise SDG&E's rates by 1% to 2% over current levels.¹⁵

¹³ See CAISO Business Practice Manual for The Transmission Planning Process at 60–61 (dated Aug. 10, 2012), available at <https://bpm.caiso.com/bpm/bpm/version/000000000000179/>; and CAISO Fifth Replacement Tariffs, App. F (dated Nov 5, 2012), available at http://www.caiso.com/Documents/TariffAppendicesC-F_Nov5_2012.pdf.

¹⁴ See CAISO Fifth Replacement Tariffs, sec. 26 (dated Nov. 5, 2012), available at http://www.caiso.com/Documents/TariffSections25-35_Nov5_2012.pdf; CAISO Fifth Replacement Tariffs, App. A, "High Voltage Transmission Facility" (unpaginated) (dated Nov. 5, 2012), available at http://www.caiso.com/Documents/TariffAppendixA_Nov5_2012.pdf; and CAISO Business Manual, *supra* n.13.

¹⁵ DRA's estimated rate impact of the CNF Projects is based on the rate impact of comparable costs for SDG&E's proposed South Orange County Reliability Enhancement Project in A.12-05-020.

B. The Application fails to justify as reasonable spending \$418.5 million, the CNF Projects' costs, for fire safety in the CNF.

The Application claims *inter alia* that the CNF Projects are needed to increase fire safety requirements by G.O. 95.¹⁶ First, however, it fails to state specifically what fire threats the existing the 69 kV power lines and 12 kV distribution line and related facilities pose in the CNF that necessitate the CNF Projects. Second, it does not show that current State, Federal, and SDG&E's own fire risk mitigation measures fail to address these problems and thus require the CNF Projects.

Third, the Application does not identify and explain what particular elements of applicable State and Federal regulatory requirements require the CNF Projects. For example, the Application does not identify the particular G.O. 95 provision that requires replacing over two thousand existing wood poles with weathered-steel poles at a one-to-one ratio at a cost of nearly a half-billion dollars.¹⁷

Statistics from the U.S. Department of Agriculture, Forest Service, *Environmental Assessment for San Diego Gas & Electric Master Special Use Permit for Cleveland National Forest, Orange and San Diego Counties, California* (FSEA) (dated March 2009), show a total of 1,626 fires on USFS lands within the CNF from 1970 to 2007. Only 29 (or 1.8%) of the 1,626 fires recorded are power-line related fires.¹⁸

Specifically, the Witch, Guejito, and Rice fires of 2007 were caused by high winds and power lines contacting vegetation, as follows:

Key findings indicate that winds in the vicinity of the fire area peaked at velocities approaching 50 miles per hour (MPH). In each case the fires started when the lines came in contact with each other, vegetation, or other wires, causing sparks that ignited dry vegetation. The Witch Fire was associated with a

¹⁶ SDG&E Appl. vol. I at 4.

¹⁷ See SDG&E Appl. vol. I at 4–5 (“Construction Objectives”).

¹⁸ See FSEA at 10 tbl.2, available on file from DRA as part of SDG&E Nov. 16, 2012 Rev. Data Resp.

69 kV line, and the Guejito and Rice fires were associated with 12 kV lines.¹⁹

In 2008, at the time of the Witch and Rice Fires, the Commission's Consumer Protection Safety Division (CPSD) found that SDG&E had failed to comply with GO 95 fire safety measures.²⁰

The Forest Service special use permits require permittees to comply with all applicable laws; keep right of way (ROW) clear of vegetation that may cause fires; and prepare a Fire Control Plan. It has also adopted the power line clearing requirements established by CalFire. SDG&E has its own system-wide Fire Preparedness Program which incorporates the Forest Service measures, such as increasing spacing between conductors and using heavier wire.²¹ SDG&E has failed to show that the safety and fire risk mitigation measures of the Commission, CalFire, the Forest Service, and its own initiatives are so inadequate that the CNF Projects are necessary.

Thus, a public hearing is called for, because the Application has failed to justify as reasonable the CNF Projects. Less costly and equally as effective alternatives than the CNF Projects are available and already required by State and Federal administrative agencies. SDG&E should implement fully and completely these more cost-effective options before burdening the ratepayers with half-a-billion dollars of costs.

C. SDGE fails to justify as reasonable spending \$418.5 million for reliability problems in its CNF transmission or distribution lines.

First, the Application does not specifically and factually state the nature of the electric transmission or distribution reliability problems that necessitate the CNF Projects. Second, it does not identify the particular component of the CAISO Tariffs, FERC Standards of Conduct, and/or NERC Reliability Standards that call for the CNF Projects as a result of these problems.

¹⁹ *Id.* at 11.

²⁰ Petn.07-11-007, *CPSD Report of the Consumer Protection and Safety Division Regarding the Guejito, Witch and Rice Fires* at 2 (dated Sept. 2, 2008), available at <http://docs.cpuc.ca.gov/published/Graphics/87470.PDF/>.

For example, the \$418.5 million costs of the CNF Projects rank higher than the estimated cost for over 95% of projects that the CAISO deems necessary to improve reliability and efficiency. According to its 2011-2012 ISO Transmission Plan (ITP) (dated March 23, 2012), only 9 of the 134 (6.7%) transmission projects approved by the CAISO have estimated cost above \$50 million.²² In addition, only 2 of the 30 (6.7%) transmission projects submitted through the 2011 Request Window seeking CAISO approval have estimated cost above \$50 million.²³

At a public hearing, SDG&E would have to prove more specifically than so far presented the reliability problems that actually exist in its electric CNF lines; that no other more cost-effective alternatives to the CNF Projects are available; and the benefits of the CNF Projects to ratepayers are commensurate with its costs. While in principle improving reliability in electrical transmission and distribution lines is a commendable public goal, it does not suffice in this specific instance for burdening the ratepayers with exorbitant costs.

IV. CONCLUSION

DRA does not recommend approving *ex parte* the Application, because the CNF Projects are not justified as reasonable, consistent with the law, and in the public interest. Therefore, the Commission needs to hold hearings and develop a full and complete record of the facts and the law regarding the need for the CNF Projects.

(continued from previous page)

²¹ FSEA at 11.

²² See ITP at 419–425, available at <http://www.aiso.com/Documents/Board-approvedISO2011-2012-TransmissionPlan.pdf> (CAISO conducts an ITP each year to identify potential system limitations as well as opportunities for system reinforcement that improve reliability and efficiency.).

²³ *Id.* at 426–428.

Respectfully submitted,

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November 26, 2012

Attachment C

1 ALJ YACKNIN: So with that, do we think
2 we will be able to wrap up at 1:00 o'clock?

3 MR. ZELLER: Yes, your Honor.

4 ALJ YACKNIN: Okay. I will recall
5 Mr. Knowd to the stand. And I will remind
6 you you are still under oath.

7 TIMOTHY M. KNOWD,
8 resumed the stand and testified further as
9 follows:

10

11 THE WITNESS: Okay. Thank you.

12 ALJ YACKNIN: Thank you, Mr. Knowd.

13 And you are recalled for the -- truth be
14 told, there might have been a second matter.
15 I don't recall. Maybe the parties can remind
16 me. But I do recall very clearly that one of
17 the issues that Protect Our Communities
18 wanted to examine you about, Mr. Knowd, is
19 the SDG&E's compliance with the conductor
20 spacing required under General Order 95.

21 Mr. Zeller.

22 CROSS-EXAMINATION (Resumed.)

23 BY MR. ZELLER:

24 Q Mr. Knowd, does the Commission --
25 General Order 95 is designed to provide
26 standards so that electric transmission lines
27 -- 69 kV lines, 12 kV lines are designed in a
28 manner so they're safe; is that -- would you

1 agree with that?

2 A That is one of the -- one of the
3 objectives.

4 Q And one of the standards is GO 95
5 is really the conductor spacing; is that
6 correct?

7 A That's correct.

8 Q Okay. Now, do the existing wood
9 poles meet General Order 95's requirements?

10 A Yes, my understanding is that they
11 are based on the time they were installed.

12 Q And do you think the General Order
13 spacing requirements are adequate to provide
14 for fire safety in the poles that are the
15 subject of this application?

16 A My understanding of the General
17 Orders as they are currently in place are
18 designed to address the fire related
19 concerns.

20 Q Did -- so the existing poles meet
21 the General Order 95 requirements; is that
22 correct?

23 A To the extent that those poles need
24 to have work done on them, my understanding
25 is we as a company have an obligation to
26 bring them up to the latest standards, which
27 in the case of General Orders may have
28 changed since the date that equipment was

1 installed. So to the extent that we're doing
2 work on that pole, it has to be completed to
3 the latest standards and General Orders.

4 Q For a 69 kV line that's operating
5 on a wood pole, the GO specifies how far
6 apart the conductors must be; is that
7 correct?

8 A Correct.

9 Q And so there's no problem in terms
10 of compliance with the existing system? It
11 does comply with General Order 95's
12 requirements?

13 A Yes, we work to make sure all of
14 our facilities are in compliance with the
15 General Orders, which I understand are a
16 minimum requirement.

17 Q Okay. So from SDG&E's perspective,
18 General Order 95 provides for adequate
19 clearance; is that --

20 A Adequate minimum clearance, that's
21 correct.

22 Q Okay. Were all of SDG&E's lines in
23 compliance with General Order 95 back in
24 2007?

25 MS. KRIPKE: Your Honor, objection,
26 vague. SDG&E's service territory is
27 extremely large.

28 MR. ZELLER: Q Let me go specifically

1 to the three fires that are the subject of
2 the CPSD report. Were all of those lines in
3 compliance with General Order 95 at that
4 time?

5 A I can't speak to every foot of wire
6 on those lines, but we do have a regular
7 inspection process that reviews compliance
8 with regulations such as the General Orders.

9 Q And how did SDG&E respond after
10 those fires? Did it expect its system to
11 make sure that all of the lines that it's
12 operating, including the ones that are the
13 subject of this application, meet General
14 Order 95 requirements?

15 A I know there was some efforts done
16 to review our system from a safety and
17 reliability standpoint, the details of which
18 I'm not entirely privy to.

19 MR. ZELLER: I'm going to object to the
20 response as being vague.

21 THE WITNESS: Can you repeat the
22 question?

23 ALJ YACKNIN: Why don't you try that?

24 MR. ZELLER: Q Did you -- did SDG&E do
25 an inspection of its lines in response to the
26 2007 fires to ensure that they were in
27 compliance with General Order 95?

28 A Can you clarify the timing of that?

1 Because we do that on a regular basis.
2 Something more specific in terms -- within a
3 few weeks of the fires or --

4 Q Within six months.

5 A My understanding is that there --
6 there was a -- an effort to review and
7 inspect all the lines. Whether they were
8 completed within six months or not, I'm not
9 sure.

10 ALJ YACKNIN: Mr. Zeller, at the risk
11 of asking you to testify, can you tell me
12 does General Order 95 govern both vegetation
13 and conductor spacing? And if so, are you
14 referring to both of those right now?

15 MR. ZELLER: To be honest, your Honor,
16 I -- we're just addressing 95 right now. I
17 don't know the answer.

18 ALJ YACKNIN: And that just vegetation?

19 MR. ZELLER: That's conductor spacing.

20 ALJ YACKNIN: So these questions now
21 are regarding vegetation.

22 THE WITNESS: Oh, okay.

23 ALJ YACKNIN: So can you -- let's
24 repeat the question with that clarification.
25 Do you know if SDG&E inspected its system
26 that's in the Cleveland National Forest to
27 ensure compliance with the vegetation
28 management requirements of the Commission's