

**PUBLIC ADVOCATES OFFICE**PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298**Executive Summary****Comments of the Public Advocates Office  
on the 2021 Wildfire Mitigation Plan Updates of the  
Small and Multijurisdictional Electric Utilities**

April 14, 2021

All California electric utilities should work to reduce the risk of utility-related wildfires in the most efficient and speedy manner feasible. The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) has conducted a thorough review of the 2021 wildfire mitigation plan (WMP) updates submitted by Bear Valley Electric Service (BVES), Liberty Utilities (Liberty), and PacifiCorp. This executive summary describes our recommendations to improve each utility's WMP.

**General Recommendations**

One general area of concern is quality assurance (QA), quality control (QC), and program oversight. These measures, which are statutorily required to be included in the utilities' WMPs,<sup>1</sup> are vital to make sure that utilities identify and correct mistakes before those mistakes can lead to catastrophic wildfires. However, BVES' and Liberty's WMPs lack robust QA/QC and oversight programs. We recommend that BVES accelerate the implementation of its QA/QC program for asset inspections and provide more detail on its internal audit processes. We recommend that Liberty implement QA/QC programs for its asset inspections and grid hardening work in 2021. Going forward, we recommend that the Wildfire Safety Division (WSD) convene a working group to develop best practices for QA/QC and revise the future WMP guidelines to call attention to both QA and QC separately.

In several areas, Cal Advocates identifies significant differences between the three small utilities' WMPs.<sup>2</sup> These disparities include the wind speed thresholds that trigger voluntary de-energization events, the use of light detection and ranging (LiDAR)

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<sup>1</sup> Public Utilities Code Section 8386(c)(21).

<sup>2</sup> While PacifiCorp is a large utility that serves six Western states, its service territory in California is comparable to those of Bear Valley Electric Service and Liberty Utilities.

technology and drones for inspections of distribution lines, and the costs of installing covered conductor on distribution lines. We recommend that the WSD more closely examine these differences, with the goal of developing best practices so that all utilities can efficiently increase wildfire safety. To better understand the reasons for the differences, the WSD should hold working groups or require the utilities to report data that supports their practices.

The small utilities lag behind their larger counterparts<sup>3</sup> with respect to inspecting parts of their systems that represent the greatest risk of causing wildfires. The three small utilities all conduct detailed inspections of distribution assets in high fire-threat districts on a five-year cycle, while the large utilities perform these inspections every one to three years. We recommend that the WSD work with the small utilities to evaluate the potential benefits of more frequent inspections.

### **Recommendations Specific to BVES' WMP**

We note two specific concerns for BVES. First, BVES has slowed its pace of work on removing conductors attached to trees and assessing pole loads for structural safety. BVES should consider completing these programs sooner than 2026. Second, BVES reports a high rate of vegetation that does not comply with required clearance distances. BVES should explain why this is occurring and assess whether it needs to modify its vegetation management practices.

### **Recommendations Specific to Liberty's WMP**

In addition to improving QA/QC as noted above, Liberty should improve its oversight of its contractors, so that it can track the performance of individual contractors.

### **Recommendations Specific to PacifiCorp's WMP**

We also observe two issues particular to PacifiCorp. First, PacifiCorp's WMP lacks detail on its automatic recloser operations for distribution circuits, grid topology improvements, and system automation projects. PacifiCorp should explain how these programs will affect the frequency and scope of voluntary de-energization events. Second, PacifiCorp appears to be falling behind schedule on its grid hardening initiatives (specifically, covered conductor installation and pole hardening). PacifiCorp should explain the circumstances that slowed its progress in 2020 and how it is learning from those delays to ensure that it can achieve the rapid ramp-up in grid hardening that it forecasts for future years. PacifiCorp's WMP should outline contingency plans in case other eventualities impede progress.

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<sup>3</sup> The three large California electric utilities are Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E) and Southern California Edison Company (SCE).