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May 27, 2020

Ms. Caroline Thomas Jacobs
Director, Wildfire Safety Division
California Public Utilities Commission, Wildfire Safety Division
505 Van Ness Avenue
San Francisco, CA 94102

Ref: R.18-10-007

Transmittal via email: wildfiresafetydivision@cpuc.ca.gov and R.18-10-007 service list

RE: MUSSEY GRADE ROAD ALLIANCE COMMENTS ON WSD-002 TO WSD-005

Dear Ms. Thomas Jacobs:

Pursuant to Rule 14.5 of the California Public Utilities Commission (CPUC) Rules of Practice and Procedure and instructions provided in Proposed Resolutions WSD-002 through WSD-009, the Mussey Grade Road Alliance (MGRA or Alliance) serves these comments on Proposed Resolutions WSD-002 (Guidance),[1] WSD-003 (PG&E),[2] WSD-004 (SCE),[3] and WSD-005 (SDG&E).[4]

1. INTRODUCTION

The Alliance generally supports the proposed resolutions submitted by the Wildfire Safety Division (WSD) and is pleased to have the opportunity to provide feedback on them. MGRA

[1] DRAFT RESOLUTION WSD-002 Guidance Resolution on 2020 Wildfire Mitigation Plans Pursuant to Public Utilities Code Section 8386; May 7, 2020. (DR WSD-002)
[2] DRAFT RESOLUTION WSD-003 Resolution Ratifying Action of the Wildfire Safety Division on Pacific Gas and Electric Company's 2020 Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8386; May 7, 2020. (DR WSD-003)
[3] DRAFT RESOLUTION WSD-004 - Resolution Ratifying Action of the Wildfire Safety Division on Southern California Edison Company's 2020 Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8386; May 7, 2020. (DR WSD-004)
[4] RESOLUTION WSD-005 - Resolution Ratifying Action of the Wildfire Safety Division on San Diego Gas & Electric Company's 2020 Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8386; May 7, 2020. (DR WSD-005)

provided extensive technical comments on the utility Wildfire Mitigation Plans (WMPs),[5] and we are pleased that some of this input was incorporated into the draft resolutions. The IOUs whose WMPs we reviewed – SDG&E, PG&E, and SCE – also replied to MGRA comments,[6] and to the extent their reply is relevant to the draft resolutions we respond to them in these comments as well.

As we noted in our WMP comments and previous filings in R.18-10-005, the Alliance is a is a grass-roots citizen-based organization established in 1999 that has been active in wildfire safety issues at the CPUC since 2006. In fact, the first CPUC requirement that IOUs develop fire prevention plans was developed from an MGRA proposal. The current WMP development and review process is far more elaborate and extensive than its predecessor. This is appropriate given the magnitude of the threat posed by utility wildfires, made clear by the catastrophes of 2017 and 2018.

Given the extremely accelerated timeline for reviewing and approving the WMPs, it is inevitable that certain things will be overlooked or not given proper emphasis, and that errors will be made. This goes for all WMP review participants, including the WSD. In accordance with instructions provided by the draft resolutions and convention in responding to draft decisions, MGRA's comments will refer specifically to factual, legal and technical errors, and we propose alternative language in all cases.

With regard to the draft resolutions as a whole, they are an excellent start to an iterative process of continuous improvement. A couple of general comments: First, given the aforesaid haste and the fact that no such effort has ever been attempted before, it is inevitable that there will be errors and inefficiencies in the framing and execution of the WMP process. However, even when this is clearly the case, WSD appears hesitant to admit that instructions or templates need more work, or in a few cases are just wrong. This is unfortunate, as it may interfere with or delay the goal of improved fire safety. Secondly, third party reviewers made many comments, and while some of

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[5] WILDFIRE MITIGATION PLAN COMMENTS ON BEHALF OF THE MUSSEY GRADE ROAD ALLIANCE; April 7, 2020. (MGRA Comments)

[6] REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY ON 2020 WILDFIRE MITIGATION PLANS; April 16, 2020. (SDG&E Reply)
REPLY COMMENTS ON THE 2020-2022 WILDFIRE MITIGATION PLAN OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E); April 16, 2020. (PG&E Reply)
SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY TO PUBLIC COMMENTS; April 16, 2020. (SCE Reply)

these are acknowledged by WSD in a dedicated section, these ideas are not reflected by citation in the cases in which they influence WSD actions, as would be the case more generally in a CPUC decision. Neither of these issues is severe enough to compromise the quality of the proposed resolution, but we would request that WSD take them under consideration during future reviews.

MGRA comments on the proposed resolutions were prepared by Joseph W. Mitchell, Ph.D.

2. SUGGESTED MODIFICATIONS

2.1. WSD-002 – Guidance

2.1.1. Page 8 – Guideline, template, and data revisions

Original: "The WSD will therefore incorporate comments into its 2021 WMP Guideline revision, as well as soliciting further stakeholder input for those guidelines."

Proposed: "The WSD will therefore incorporate comments into its 2021 WMP Guideline revision~~, as well as soliciting further stakeholder input for those guidelines~~ **and will work with utilities and stakeholders to solicit input and standardize data and reporting as it continues to pursue improvements that enhance the WMP review and approval process. WSD will sponsor workshops to discuss definitions, utility best practices, and the CMM template prior to issuance of 2021 guidelines and templates**."

Final: "The WSD will therefore incorporate comments into its 2021 WMP Guideline revision, and will work with utilities and stakeholders to solicit input and standardize data and reporting as it continues to pursue improvements that enhance the WMP review and approval process. WSD will sponsor workshops to discuss definitions, utility best practices, and the CMM template prior to issuance of 2021 guidelines and templates."

Justification: Technical errors, errors of fact, error of law.

MGRA as well as other stakeholders have pointed out a number of errors or poor definitions in the WMP Guidelines, and in the Capability Maturity Model, and in data reporting requirements. Technical analysis by MGRA in its WMP review subsequently identified cases in which inadequate definitions led to incorrect or nonsensical results. These include:

- Red flag day warning miles show no statistical correlation with most correctly defined "near miss" metrics such as outages, wires down, or ignitions for any utility.

They are not helpful as a risk normalization and need to be supplemented.[7] SDG&E agrees with MGRA's analysis on this point,[8] and other IOUs do not object to it.

- Table 10 calculations of wind conditions above 95th and 99th percentile in circuit-mile-days was shown to be a flawed metric, not only because each utility performed this calculation in a completely different manner, but also because the fundamental definition is flawed.[9] MGRA provides a theoretical example in which this metric would miscalculate relative wind hazard by a factor of 75X.[10] Peak wind value is a critical metric for ignition,[11] and the WMPs should contain a metric that adequately tracks peak wind value.
- Utilities are heavily invested in the development of their Fire Potential Indices (FPIs), and even though all are approaching a similar problem it is not possible for WSD to ascertain the degree to which these accurately represent fire risk.[12]
- MGRA analysis of utility weather modeling and measurement data revealed that there are substantial systematic differences between the methodologies used by utilities, and that substantially different results can be obtained when different models are applied to the same location.[13] Utility weather modeling and measurements are used for key utility initiatives, including engineering standards,

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[7] MGRA WMP Comments; pp. 8-13.

[8] SDG&E WMP Reply; pp. 8-9: "The Mussey Grade Road Alliance (MGRA) (at Section 2.3.1) explains that while red flag warning day miles are correlated to wildfires, it is not a useful normalization tool, as they are not statistically correlated to outages, wire down events, or ignitions. This is an example of why workshops are important, so that metrics and how they should be calculated and utilized can be discussed with interested stakeholders."

[9] MGRA WMP Comments; pp. 13-16.

[10] In its reply comments, SCE noted a use case for which the "local" 95/99% wind value would be useful. On p. 24 they state: "SCE believes that 95th and 99th percentile wind gusts provide more information on the necessary reliability for a location given its local weather pattern, whereas using specific wind speeds (or territory-wide 95th/99th) will only be relevant for reliability measures in locations that happen to experience the selected threshold. Utility systems are built to withstand typical conditions in an area and assigning these metrics to absolute wind speeds will ignore winds that are considered high in portions of the service territory that do not typically receive strong wind gusts, but might not reach the specific threshold." While this may be a valid case, it is important to note that regarding "typical conditions in an area", SCE was unable to provide an estimate to MGRA of how much of its infrastructure was built to "old" (56 mph) loading requirements, admitting that "SCE does not track the circuit miles in its HFRA that were built to a wind loading standard less than that of current known local conditions." (Data request response MGRA-SCE-006, Question 3.) So MGRA maintains that knowing absolute peak winds is critical for determining engineering standards, vegetation management practices, and PSPS thresholds. And we re-emphasize most emphatically that 'circuit-mile-days' above locally measured 95/99% threshold **does not measure peak wind values.**

[11] MGRA WMP Comments; pp. 11-12.

[12] MGRA WMP Comments; pp. 22-25.

[13] MGRA WMP Comments; pp. 53-60.

prioritization of hardening, and de-energization thresholds. Correct weather modeling and accurate measurement therefore have direct impacts on public safety.

- The Capability Maturity Model question regarding GO 95 have a trivial result, and all utilities will report compliance whether or not their current infrastructure is designed, built, operated, and maintained for known local conditions.[14]
- MGRA statistically demonstrated that the Capability Maturity Model question regarding customer complaints rewards IOUs that deter customers from reporting complaints or from filing claims with higher maturity scores.[15]

Many of these conclusions are based on a technical analysis by MGRA. Only one of them has been challenged by an IOU (see footnote regarding SCE above), and in fact utilities concur that workshops to address open issues would be helpful. Nevertheless, given the curtailed timelines associated with the WMP review process, it has not been possible for the WSD to make findings of fact with regard to the claims made by MGRA or other intervenors. The Commission generally takes two approaches to the evaluation of technical issues, the first being evidentiary hearings and the second being technical workshops followed by workshop reports and comment/reply cycles.[16] These differ in formality, but allow for all parties to have due process and right of appeal. However, neither of these processes could be applied in this case. For the Commission to accept or reject findings made by WSD not based on "any reasonable construction of the evidence" will leave resolutions open to "attack for insufficiency".[17] Additionally, it would potentially deny stakeholders due process rights.

This legal error is straightforward to remedy: WSD should ensure that processes are in place to allow its own vetting of technical issues and to allow stakeholders to provide technical input within a reasonable timeframe. It can do this by soliciting stakeholder input, sponsoring workshops to discuss this input, and allowing stakeholder comment and reply on workshop outputs. For this purpose, "moderated" workshops have much greater value than "panel" workshops, since

[14] MGRA WMP Comments; pp. 65-72.
[15] MGRA WMP Comments; pp. 72-74.
[16] The latter was successfully used in Wildfire OIRs R.08-11-005 and R.15-05-006.
[17] *Toward Utility Rate Normalization v. Public Utilities Com*. (1978) 22 Cal.3d 529, 537: "The findings of fact by the Commission are to be accorded the same weight that is given to jury verdicts and the findings are not open to attack for insufficiency if they are supported by any reasonable construction of the evidence."

moderated workshops allow all stakeholders to present results and ask questions. Among the topics that require additional work are:

- Evaluation of Red Flag Warning circuit-mile-days as a risk normalization metric
- Determination of an appropriate peak wind gust metric
- Discussion and comparison of utility wind models and measurements
- Discussion and comparison of utility Fire Potential Index (FPI) models.
- Corrections and improvements to the Capability Maturity Model (CMM) questions.
- Inconsistencies between utility metrics, for example vehicle and balloon ignition rates

2.1.2. Page 16 and Ordering Paragraphs - Future Public, Stakeholder, and Party Input

Page 16:

Original: "Each electrical corporation shall submit its initial quarterly report 90 days after the Commission ratifies the WSD Resolutions, and every three months thereafter."

Proposed: "Each electrical corporation shall submit its initial quarterly report 90 days after the Commission ratifies the WSD Resolutions, and every three months thereafter. **WSD shall accept stakeholder comment within 15 days of quarterly report submittal.**"

Clean: "Each electrical corporation shall submit its initial quarterly report 90 days after the Commission ratifies the WSD Resolutions, and every three months thereafter. WSD shall accept public comment within 15 days of quarterly report submittal."

Add to OP-8:

WSD shall accept stakeholder comment within 15 days of quarterly report submittal.

Justification: Error of Law.

WSD-002 requests IOUs to provide updates throughout the year in order to address progress on "Class B" deficiencies: "Class B deficiencies are of moderate concern and require reporting on a quarterly basis by the electrical corporation to provide missing data or update its progress

in a quarterly report."[18] MGRA supports this requirement, since as we noted in our comments "we would suggest that WSD make the yearly reviews of the WMPs a more rigorous process than would be required in an annual update. It should target specific areas that need additional work and revision, and require updates in those areas."[19] Quarterly review overcomes the limitations created by short deadlines by extending the review over the year, so that the required effort can be focused on issues requiring attention. WSD review is required to accept public comment on wildfire mitigation plans as per PUC Section 8386(d): "The Wildfire Safety Division shall accept comments on each plan from the public, other local and state agencies, and interested parties…" As the quarterly updates represent modifications to the original plans, it follows that the PUC code would suggest that WSD also accept public comment on these updates. Accepting comment would also be consistent with the regulatory tradition established by the Commission to foster transparency. For example, IOUs are required to issue a report after ever de-energization event, and SED is required to accept public comment on each of these reports.[20]

As to whether party data requests can continue to be issued based upon new information shared in the quarterly reports, we would ask the Commission to determine in R.18-10-007 the process for continued party engagement in the WMP reviews as it proceeds through 2020, and more broadly how parties will engage with the utilities and WSD in the WMP review process as WSD migrates out of the Commission in 2021. The Commission's power and obligation to enforce the Public Utility Code Section 451 assuring safe and affordable service are not affected by which regulatory body WSD resides in, and part of the Commission's duty under Section 8386(d) in reviewing WSD's proposed resolution is to "verify that the plan complies with all applicable rules, regulations, and standards, as appropriate." Hence it is and will remain within the Commission's power to determine how parties may engage in the WMP review process in order to preserve their due process rights.

[18] DR WSD-002; p. 16.
[19] MGRA WMP Comments; p. 3.
[20] D.19-05-042; p. 107.

2.1.3. Page 18 and Ordering Paragraph - Risk-Spend Efficiencies

Page 18:

Original: "Although RSE concepts have been considered for several years through Commission GRCs, utilities still display unrefined and limited abilities to produce such information. Considering…"

Proposed: "Although RSE concepts have been considered for several years through Commission GRCs, utilities still display unrefined and limited abilities to produce such information. **In the longer term, inconsistencies between utilities approaches to RSE calculation should be addressed in the upcoming S-MAP OIR(D.18-12-04, OP 5). Presently, c**onsidering…"

Clean: Proposed: "Although RSE concepts have been considered for several years through Commission GRCs, utilities still display unrefined and limited abilities to produce such information. In the longer term, inconsistencies between utilities approaches to RSE calculation should be addressed in the upcoming S-MAP OIR(D.18-12-04, OP 5). Presently, considering…"

Add Ordering Paragraph: "Inconsistencies between utilities approaches to RSE calculation should be addressed in the upcoming S-MAP OIR(D.18-12-04, OP 5)."

Justification: Technical Error

As shown in MGRA's comments on the WMPs, the ratios of RSEs between various categories varies tremendously from utility to utility, with overall scale varying by a factor of 20,000.[21] This inconsistency invalidates the utility of risk/spend efficiencies as a mechanism to inform risk reduction prioritization. While MGRA does not object to WSD's proposal to request additional detail from the utilities, there should be no expectation that the RSEs calculated by IOUs will be comparable even with this additional detail. Resolution of this problem will require additional refinement of the Commission's S-MAP requirements for RAMP proceedings. Driving this process is currently outside of WSD's mandate, but, as it notes, "not having quantifiable information on how those initiatives reduce utility ignition risk relative to their cost severely limits the WSD's ability to evaluate the efficacy of such initiatives and each utility's portfolio of

[21] pp. 38-39.

initiatives…"[22] Consequently, future success of WSD's evaluation of WMPs depends on further Commission action. This should be explicitly called out.

2.1.4. Lack of PSPS Secondary Impacts in RSEs – page 20, New Deficiency and Condition, and Finding

No Original.

Clean: "*Deficiency (Guidance-N, Class C): Lack of PSPS secondary impacts in RSEs.*

In the February workshops, utilities reported that their PSPS RSE calculation assumes few internal costs, no external costs to society as a consequence of the PSPS, and near-perfect wildfire mitigation as a benefit—hence a high RSE value. This calculation does not account for the significant, cascading consequences that a decision to turn off the power inflicts on the communities they serve, including the potential for significant economic loss, customer and community safety risks, and transferred risk of ignitions, such as increased generator use. RSE should not be used to justify use of PSPS until these secondary impacts are correctly incorporated."

Condition (Guidance-N, Class C): Prior to their next annual update, utilities will work with stakeholders under the auspices of CPUC proceeding R.18-12-005 to develop methodologies to quantify impacts of PSPS on the public so that these can be incorporated into RSEs"

New Finding: "Risk-spend efficiency calculations by the utilities for PSPS are incorrect because they do not include societal costs of shut-off. Utilities shall work with stakeholders in Commission proceeding R.18-12-005 to develop a correct RSE methodology for de-energization."

Justification: Technical Error

As will be discussed in Section 2.2.2, PG&E was not the only utility to note that its RSE does not incorporate public harm – SCE stated this as well, so it was an error of fact for WSD to single out PG&E on this issue. WSD is correct to call PG&E out in PR WSD-004, but in fact none of the IOUs incorporate public harm from de-energization into their RSEs. MGRA shows in its comments that all of the major IOUs have artificially high RSEs for PSPS due to the fact that they do not incorporate external costs from de-energization, and that therefore their RSEs are incorrect.[23] As WSD correctly notes in PR WSD-004, "RSE is a critical tool to inform targeted allocation of resources toward actions that offer the greatest risk reduction per dollar spent."[24] Therefore, it is

[22] DR WSD-002; p. 18.
[23] MGRA WMP Comments; pp. 42-43.
[24] p. 59.

unacceptable to have one of the primary wildfire prevention strategies used by the utilities have an RSE that is incorrect.

MGRA explains why the effort to develop a proper framework for risk-spend efficiency calculations related to de-energization should not be driven by the utilities on pages 19 through 22 of its WMP Comments. We note that "no Commission admonition can eliminate the inherent moral hazard that arises from liability-shedding. Until and unless utilities are held liable for substantive regulatory or civil damages due to harm arising from shutoff, it is good business policy for them to rely on shutoff as a workhorse mechanism to reduce wildfire risk and liability." IOUs have no motivation to develop the RSEs correctly, and thereby expose themselves to potential costs and liability. This effort should be driven either by WSD or the Commission, and currently responsibility for developing regulation related to de-energization is under the auspices of Commission proceeding R.18-12-005.

As WSD noted, an accurate RSE for wildfire mitigation programs is essential for it to do its job. If WSD requires Commission action in order to resolve this problem it needs to call this out in the Proposed Resolution. For this reason, a new finding is included in WSD-002, noting that action in R.18-12-005 is necessary for WSD to meet its requirements.

2.2. WSD-003 – PG&E

2.2.1. Page 34 - Situational Awareness and Pilots – PG&E Satellite Program

Original: "As noted, PG&E is testing a number of technology options through pilots and small demonstration projects. To ensure pilots that are successful result in expansion if appropriate, PG&E must evaluate each pilot or demonstration and describe how it will expand use of successful pilots."

Proposed: "As noted, PG&E is testing a number of technology options through pilots and small demonstration projects. To ensure pilots that are successful result in expansion if appropriate, PG&E must evaluate each pilot or demonstration and describe how it will expand use of successful pilots. **PG&E's pilot of satellite detection is currently providing data which should be included in its next filing**."

Clean: "As noted, PG&E is testing a number of technology options through pilots and small demonstration projects. To ensure pilots that are successful result in expansion if appropriate, PG&E must evaluate each pilot or demonstration and describe how it will expand use of successful pilots. PG&E's pilot of satellite detection is currently providing data which should be included in its next filing."

Justification: Technical Error

WSD alluded to PG&E's satellite wildfire detection program in its review of PG&E's WMP, stating that the program was in its "infancy".[25] While nascent, PG&E has presented some satellite results in its WMP[26] and has further elaborated on them in their data responses to WSD[27] and MGRA.[28] In its response to WSD, PG&E claims to have received alerts on 2,800 fire incidents from June 2019 to March 2020, three of which were CPUC-reportable incidents. MGRA analysis of these incidents showed that for two of them, the wildfire was not detected for 1 ½ hours after ignition, while the third (the Kincaid fire) was detected less than ten minutes after ignition.[29] The data that PG&E has provided raises questions regarding both the efficiency and false alarm rate of its satellite detection system. Furthermore, if it is effective the satellite detection system could also be utilized by other utilities. There should currently be adequate data to provide these estimates, and for PG&E not to do so is a technical shortcoming in its WMP. WSD, at the least should specifically require that PG&E present data for its satellite wildfire detection pilot by its next update, and possibly in a quarterly update.

2.2.2. Page 59 - Risk-Spend Efficiency and De-Energization

Original: "In the February workshops, PGE reported its PSPS RSE calculation assumes few internal costs, no external costs to society as a consequence of the PSPS, and near-perfect wildfire mitigation as a benefit—hence a high RSE value… RSE should not be used to justify PG&E's use of PSPS."

Proposed: "Original: "In the February workshops, ~~PGE reported its~~ **IOUs indicated that** PSPS RSE calculation assumes few internal costs, no external costs to society as a consequence of

[25] PR WSD-03; p. 31.
[26] PG&E WMP; p. 11.
[27] WSD_002-Q006-PGE-43895-D-286
[28] MGRA_005-Q16
[29] MGRA WMP Comments; pp. 25-27.

the PSPS, and near-perfect wildfire mitigation as a benefit—hence a high RSE value… RSE should not be used to justify PG&E's use of PSPS."

Clean: "Original: "In the February workshops, IOUs indicated that PSPS RSE calculation assumes few internal costs, no external costs to society as a consequence of the PSPS, and near-perfect wildfire mitigation as a benefit—hence a high RSE value… RSE should not be used to justify PG&E's use of PSPS."

Justification: Error of fact

According to MGRA's expert's notes from the technical workshops, Robert LeMoine from SCE described that their RSE for de-energization did not include what he called "secondary" impacts, and therefore had very high RSEs. He further stated that RSE was not a proper tool to use since it cannot be used for circuit-level mitigation. Whether PG&E made a similar comment is not recorded, but PG&E was not the only IOU noting that external costs are not incorporated into risk-spend efficiency calculations.

This is a fairly serious shortcoming that MGRA raised in its WMP comments for all utilities.[30] It has already been discussed and a proposed Deficiency and Condition added in Section 2.1.4.

2.3. WSD-005 – SDG&E

2.3.1. Balloon and Vehicle Caused Fires, Deficiencies SDGE-1 and SDGE-2, pp. 16-18.

Proposed: Removal of deficiencies SDG&E-1 and SDG&E-2 pending further analysis.

Justification: Technical Error.

WSD notes that the percentage of ignitions from metallic balloons is higher in the SDG&E service area than in the service area of PG&E, stating that "SDG&E reports a high percentage (18%) of ignitions related to balloon contact when normalized for overhead circuit miles. Compared to PG&E, SDG&E reports more than three times the rate of such balloon contact ignitions." SDG&E sees an average of 3.6 balloon ignitions per year over 8900 miles of overhead distribution

[30] MGRA WMP Comments; pp. 42-43.

lines, or one ignition per 2,500 miles. SCE reports 3.6 ignitions per year over 39,000 miles of overhead distribution line, or one ignition per 10,800 miles. PG&E reports 14.6 ignitions per 81,0000 miles of overhead distribution line, or one ignition per 5,500 miles. WSD's claim that "SDG&E's percentage of balloon contact ignitions as a fraction of total ignitions is similar to SCE's, which seems to indicate that this issue is more concentrated in southern California" is inappropriate in this context, since SCE's overall rate of balloon ignitions per unit mile is substantially lower than even PG&E's.

Likewise, the rate of vehicle-related ignition averages 3.4 per year in the SDG&E service area, or one ignition per 2,600 miles of overhead distribution line. The rate in the SCE service area is 3.4 per year, or one ignition every 11,500 miles. In PG&E's service area the rate is 43.2 ignitions per year, or one ignition for every 1,900 miles of overhead distribution line, which is a significantly higher rate than SDG&E's. This apparently conflicts with WSD's conclusion that "SDG&E reports approximately twice the rate of ignitions related to vehicle contact compared to PG&E and SCE, when normalized for overhead circuit miles."

Aside from inconsistencies in the rate calculations, there is also the question of systematic biases in the data or in its collection. For instance, SDG&E's service territory is on the average more urbanized than the territory of the other utilities, as evidenced by its much higher fraction of underground distribution. Greater density implies that vehicle accidents with utility equipment may be comparatively more likely. Also, areas of higher density are more likely to be a source of mylar balloons. Before prescribing solutions, it would be better if the root cause of the differences between utility results were to be identified, either through an interrogative process or through workshops.

Finally, and most importantly, the goal of the WMPs is to help reduce the likelihood of catastrophic utility fires. Not all ignitions are equally likely to result in a catastrophic fire. Analysis has shown that ignitions that are correlated with the conditions that lead to rapid fire growth, specifically that are wind-driven, such as equipment failure, vegetation contact, and conductor-conductor contact, have been responsible for all catastrophic utility fires. While it is possible that an ignition from animal contact, vehicle contact, or a mylar balloon just happens to occur during extreme fire weather and results in a catastrophic fire, this is far from the most likely scenario. These ignition sources are not driven by the same conditions that lead to extreme fire weather.

It would good to remove all risks, but in the world of limited resources and time it is important to concentrate on risks most likely to result in the most harm. Rather than require SDG&E to develop remediation programs for vehicle and balloon fire risk, it would make more sense to invest the same resources into developing mitigation strategies that reduce the risk of vegetation ignitions, equipment failures, and line slap, thereby substantially reducing catastrophic fire risk and the need for de-energization.

3. CONCLUSION

MGRA appreciates the opportunity to review the Wildfire Mitigation Plans and provide comment on WSD's proposed resolution. WSD's efforts are to be commended, and its incorporation of public comment into its proposal is recognized and welcomed by the Alliance. Our comments have been provided to improve the outcome of this review process and to quicken the achievement of utility safety goals. Specifically, we believe that WSD should continue to drive the resolution of open technical issue, and should solicit input from all stakeholders and work through identified issues in technical workshops. In certain circumstances, WSD is not fully able to implement its mandate due to pending procedural work in Commission proceedings such as R.18-10-007 (WMP development) and R.18-12-005 (utility shutoff). The Commission should note these cases in this resolution to highlight specific actions that need to be taken in these proceedings.

Respectfully submitted this 27th day of May, 2020,

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