

**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).

R. 18-10-007
(Filed October 25, 2018)

**COMMENTS OF THE COUNTY OF SANTA CLARA
ON PACIFIC GAS AND ELECTRIC COMPANY'S 2020 WILDFIRE MITIGATION
PLAN**

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Dated: April 7, 2020

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I. Introduction

The County of Santa Clara (“County”) respectfully submits the following comments on Pacific Gas and Electric Company (PG&E)’s 2020 Wildfire Mitigation Plan (WMP), filed on February 7, 2020 and updated on February 28, 2020, as part of the California Public Utilities Commission’s (“Commission’s”) Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018).¹ The County appreciates the opportunity to provide comments on PG&E’s 2020 WMP and strongly supports efforts from the Commission to ensure continuous, safe, and reliable electricity services to all residents in Northern California.

II. Background

The County has a population of approximately 1.9 million over 1,312 square miles of land.² It is one of the most populous counties in the state, and the most populous county in Northern California.³ Its population consists about one fourth of the Bay Area’s total population. The unincorporated area of the County, which lies within the Pacific Gas and Electric Company (“PG&E”) service territory, contains both Tier 2 and Tier 3 High Fire Threat Districts.⁴

¹ The County was granted party status in this rulemaking proceeding (R. 18-10-007) on November 7, 2019.

² *E-1 Population Estimates for Cities, Counties and the State with Annual Percent Change — January 1, 2018 and 2019*, State of California Department of Finance (May 2019), <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-1/>.

³ *Id.*

⁴ *CPUC FireMap*, California Public Utilities Commission, <https://ia.cpuc.ca.gov/firemap/> (last visited Mar. 19, 2020).

Approximately 10,047 people live within a Tier 2 High Fire Threat District in the unincorporated area of the County, and approximately 5,025 people live within a Tier 3 High Fire Threat District in the unincorporated area of the County.⁵ At least one PG&E 500 kV transmission line crosses the County, and Santa Clara Valley contains 115 kV, 60 kV, and 161 kV to 230 kV PG&E transmission lines.⁶ The Santa Clara County Fire Department also provides first responder fire service in some of the Tier 2 and Tier 3 areas.

The County experienced two PG&E-instituted Public Safety Power Shutoff (“PSPS”) events during the month of October 2019: October 9-12, 2019 and October 26-28, 2019. The County was also warned of a third event to begin on October 29, 2019 that ultimately did not take place within the County. The October 9-12, 2019 PSPS event had a maximum outage duration of 66 hours and impacted approximately 34,600 customer accounts (approximately 86,500 individuals⁷) within the County.⁸ The October 26-28, 2019 PSPS event had a maximum outage duration of 94 hours and impacted approximately 25,300 customer accounts (approximately 63,250 individuals) within the County.⁹

The County, as a provider of critical services¹⁰ that depend on electricity supplied by PG&E, experienced numerous costs and negative impacts resulting from the loss of County services to its residents. During the October 2019 PSPS events, as a precautionary measure, the County brought a generator to the East Valley Clinic, which serves vulnerable populations. The clinic was located on the edge of the PSPS outage area in the map provided by PG&E, and PG&E could not confirm whether the clinic would experience a PSPS. The estimated value of County services impacted for the October 9-12, 2019 event was \$1,333,442. The estimated

⁵ *Public Safety Power Shutoff Annex: Hazard-Specific Annex to the County of Santa Clara Emergency Operations Plan*, at 26 (Oct. 2019), <http://sccgov.iqm2.com/Citizens/FileOpen.aspx?Type=4&ID=195821&MeetingID=12135>.

⁶ *PSPS Preparedness, Legislative Opportunities, Claims, and Community Resources* (Feb. 20, 2020), <http://sccgov.iqm2.com/Citizens/FileOpen.aspx?Type=30&ID=147877&MeetingID=12241>.

⁷ When PG&E refers to the number of “customers” impacted, it is referring to the number of customer *accounts*. Generally, the number of individuals affected can be estimated by multiplying the number of customer accounts by 2.5 or 3 people. *Electric Utility Power Shutoffs: Identifying Lessons Learned and Actions to Protect Californians: Background, Oversight Hearing Before the S. Comm. on Energy, Utilities and Communications*, 2019-20 Leg. Sess., (Cal. 2019), https://seuc.senate.ca.gov/sites/seuc.senate.ca.gov/files/11-18-19_background_2.pdf.

⁸ *Community Wildfire Safety Program: Santa Clara County Housing, Land Use, Environment, and Transportation Committee*, PG&E (Feb. 20, 2020), <http://sccgov.iqm2.com/Citizens/FileOpen.aspx?Type=4&ID=198634&MeetingID=12241>.

⁹ *Id.*

¹⁰ For example, the County owns and operates three hospitals, all of which have acute care facilities.

value of County services impacted for the October 26-28, 2019 event was \$3,335,328. The total cost and value of the October PSPS events to the County as an entity was \$5,275,032.¹¹

During the October 9-12, 2019 PSPS event, approximately 1,086 PG&E Medical Baseline¹² customer accounts were impacted by the de-energization.¹³ During the October 26-28, 2019 event, approximately 817 PG&E Medical Baseline customer accounts were impacted.¹⁴ However, the Medical Baseline Program captures only a segment of the County's population with access and functional needs. Of the approximately 1.9 million people residing in the County, an estimated 619,729 have access and functional needs.¹⁵ During a PSPS event, those individuals may need backup power for assistive devices, evacuation and transportation, as well as care and shelter.

PG&E established one Community Resource Center (CRC), at Avaya Stadium, in the County during the October 9-12, 2019 PSPS event.¹⁶ The CRC received approximately 35 visitors.¹⁷ During the October 26-28, 2019 PSPS event, PG&E established two CRCs in the County, at East Valley Family YMCA and the Gilroy Costco, which received approximately 15 and 10 visitors, respectively.¹⁸

¹¹ *Off-Agenda Report on Costs Associated with the PG&E Public Safety Power Shutoffs – Referral from November 5, 2019*, County of Santa Clara Finance Agency Controller-Treasurer Department (Dec. 5, 2019) (on file with the Office of the Clerk of the Board of Supervisors for the County of Santa Clara).

¹² PG&E's Medical Baseline Program is an elective ratepayer program for which customers with qualifying medical conditions may apply. To qualify for the Medical Baseline Program, a qualified medical practitioner must certify that a full-time resident in the home requires use of qualifying medical devices to treat ongoing, qualifying medical conditions (e.g., dependency on life-support equipment that they use at home, such as a respirator or dialysis machine). Medical Baseline customers pay lower rates on energy bills and receive extra notifications prior to PSPS events. *Medical Baseline Program overview*, Pacific Gas and Electric Company, https://www.pge.com/en_US/residential/save-energy-money/help-paying-your-bill/longer-term-assistance/medical-condition-related/medical-baseline-allowance/medical-baseline-allowance.page?WT.mc_id=Vanity_medicalbaseline (last visited Feb. 5, 2020).

¹³ *PG&E PSPS Referral BOS-EMS Agency* (Nov. 20, 2019), <http://sccgov.iqm2.com/Citizens/FileOpen.aspx?Type=4&ID=195160>.

¹⁴ *Id.*

¹⁵ *Public Safety Power Shutoff Annex: Hazard-Specific Annex to the County of Santa Clara Emergency Operations Plan*, at 62 (Oct. 2019), <http://sccgov.iqm2.com/Citizens/FileOpen.aspx?Type=4&ID=195821&MeetingID=12135>.

¹⁶ *Community Wildfire Safety Program: Santa Clara County Housing, Land Use, Environment, and Transportation Committee*, PG&E (Feb. 20, 2020), <http://sccgov.iqm2.com/Citizens/FileOpen.aspx?Type=4&ID=198634&MeetingID=12241>.

¹⁷ *Id.*

¹⁸ *Id.*

The County has requested information from PG&E relating to the number and type of claims presented related to the PSPS events, and the number of claims that PG&E has paid. To date, the County has not received a response from PG&E.¹⁹

The County has also requested that PG&E provide the County's Office of Emergency Management with the location of telecommunication sites within the County that are not equipped with backup power.²⁰ The County's emergency managers rely on cell towers to utilize the County's alerting and warning system. Telecommunication sites are a chief component of the Wireless Emergency Alerts system, which allows cell phone customers to receive geographically targeted emergency alerts.²¹ To date, PG&E has declined to provide the location of telecommunication sites in advance of PSPS events, citing "competitive issues."²²

III. Discussion

The County generally supports PG&E's efforts to reduce the risk of wildfires in Northern California. Detailed comments on specific sections of PG&E's 2020 WMP follow.

A. Section 2.3 Recent Performance on Outcome Metrics, Annual and Normalized for Weather, Last 5 Years

The WMP Guidelines instruct utilities, in Table 2, to "[r]eport performance on the following metrics within the utility's service territory over the past five years."²³ However, rather than performing the calculations over PG&E's entire service territory, PG&E performed the calculations over only the areas within PG&E's service territory that cross Tier 2 and Tier 3 High Fire Threat Districts. PG&E has not normalized for all events that occur within its entire service territory; as such, the numbers that PG&E has reported in Table 2 do not meet the requirements of the WMP Guidelines.

B. Section 2.6 Detailed Information Supporting Outcome Metrics

¹⁹ *PSPS Preparedness, Legislative Opportunities, Claims, and Community Resources* (Feb. 20, 2020), <http://sccgov.iqm2.com/Citizens/FileOpen.aspx?Type=30&ID=147877&MeetingID=12241>.

²⁰ Housing, Land Use, Environment, and Transportation Committee (HLUET) Regular Meeting at 1:41 (Feb. 20, 2020), <http://sccgov.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=12241&Format=Agenda>.

²¹ *Wireless Emergency Alerts*, Federal Communications Commission, <https://www.fcc.gov/consumers/guides/wireless-emergency-alerts-wea> (last visited Mar. 11, 2020).

²² Housing, Land Use, Environment, and Transportation Committee (HLUET) Regular Meeting at 1:43 (Feb. 20, 2020), <http://sccgov.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=12241&Format=Agenda>.

²³ *Pacific Gas and Electric Company 2020 Wildfire Mitigation Plan Report Updated Rulemaking 18-10-007*, at 2-8 to 2-16 (Feb. 28, 2020), https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/2020-Wildfire-Safety-Plan.pdf [hereinafter *PG&E's 2020 WMP*].

Tables 5 and 6 require PG&E to report the numbers of accidental deaths and Occupational Safety and Health Administration-reportable injuries attributed to any utility wildfire mitigation activities, including PSPS events. PG&E states that “[d]ata for ‘Member of public’ was derived from review of PG&E’s ‘Riskmaster’ database, which tracks third party claims.”²⁴ However, the reported data does not accurately reflect the number of claims that could or would have been filed as a result of PSPS events because PG&E’s claims website specifically bars claims for reimbursement arising from PSPS events.²⁵ The County asks that customers and local governments be allowed to submit claims for PSPS events via PG&E’s internal claims process in order to allow PG&E to accurately report the number of claims submitted, as required by the WMP Guidelines.

C. Section 4.4 Directional Vision for Necessity of PPS

a. Restoration of Power

The County supports PG&E’s target of restoring power for 98% of customers within 12 daylight hours from the time the weather conditions clear.²⁶

b. Backup Power Support

PG&E should specify in which individual facilities, and in what exceptional circumstances, backup generation will be deployed.²⁷ The County asks that PG&E install solar-powered microgrids with battery storage in critical facilities, such as fire and police stations and hospitals, that are located in High Fire Threat areas. The County asks that PG&E also provide refueling resources dedicated to critical telecommunications infrastructure in High Fire Threat areas, such as cell towers and repeater sites. The County asks that PG&E provide backup power to facilities serving individuals with access and functional needs in High Fire Threat areas. The County asks that PG&E bear the costs of operating and supplying CRCs with resources, including backup generation and security. The County asks that PG&E be required to implement all of these actions in order to attempt to mitigate the risks to public health, safety, and welfare associated with the PPS events.

²⁴ *Id.* at 2-30 to 2-33.

²⁵ PG&E’s current claims process specifically disclaims responsibility for power outages. *See Understanding PG&E claims policy and process*, Pacific Gas and Electric Company, https://www.pge.com/en_US/residential/customer-service/help/claims/claims.page (last visited Mar. 16, 2020) (“in most instances, [PG&E is] not responsible in the following situations: Power outages.”).

²⁶ *PG&E’s 2020 WMP* at 4-26, 5-287.

²⁷ *Id.* at 4-26, 5-130, 5-288.

c. Customer Services and Programs

PG&E's CEO, Bill Johnson, has stated that it would take about 5 years to "largely eliminate" the use of PSPS, promising "shorter, fewer PSPS events" over the next couple of years.²⁸ However, PG&E's 2020 WMP repeatedly refers to a "10-year timeframe" for "significant reduction in PSPS impacts."²⁹ PG&E should explain why PSPS events are no longer estimated to take about 5 years to be "largely eliminate[d]".

Utilities should implement a home generator safety community education program to residents in high-fire hazard areas. Although a link is available on PG&E's website, a more targeted program and outreach is needed.³⁰

D. Section 5.3.1.4 Initiative Mapping and Estimation of Wildfire and PSPS Risk-Reduction Impact

PG&E should clarify how the answer in this section addresses PSPS risk-reduction impact, rather than only wildfire risk impact.³¹

E. Section 5.3.3.11 Mitigation of Impact on Customers and Other Residents Affected During a PSPS Event

PG&E should specify which individual facilities, and in what exceptional circumstances, backup generation will be deployed.³² As a general rule, PG&E should provide specific details about the actions taken within the 3-year and 10-year time frames, rather than simply referring to a summary paragraph of actions to be taken in the future.³³ This specificity is necessary so that public agencies and customers can appropriately prepare for future PSPS events.

F. Section 5.3.6.5 PSPS Events and Mitigation of PSPS Impacts

Along with Resolution ESRB-8 and Decision 19-05-042, PG&E should cite to the new PSPS guidelines that are proposed by the CPUC and scheduled to be finalized in June 2020.³⁴ PG&E states that "PSPS is used as a measure of last resort and is only deployed when other

²⁸ *Hearing on Wildfires and Electric Grid Reliability Before the S. Comm. on Energy and Natural Resources*, 116th Cong. (2019) (statement of Bill Johnson, CEO and President, PG&E Corporation), at 1:01:00, <https://www.energy.senate.gov/public/index.cfm/hearings-and-business-meetings?ID=38AF59AB-6C4C-4854-87CA-48CFD630A032>.

²⁹ *PG&E's 2020 WMP* at 4-27.

³⁰ *See also id.* at 5-291; 5-299.

³¹ *See id.* at 5-51.

³² *Id.* at 4-26, 5-130.

³³ *See, e.g., id.* at 5-129, 5-130.

³⁴ *Id.* at 5-210.

measures are not adequate alternatives.”³⁵ PG&E should specify, if not in this section then elsewhere in the WMP, what “other measures” PG&E considers alternatives to PSPS.

G. Section 5.3.9 Emergency Planning and Preparedness

PG&E should coordinate with telecommunication utilities (e.g., Verizon, AT&T, Sprint) to identify towers that do not have backup power and provide a GIS shapefile to local public safety partners with the locations of the cell towers without backup power *in advance* of fire season.³⁶ The shapefile may be provided to local public safety partners through the secure data transfer portal.³⁷ It is essential for local emergency managers to be notified of the areas without cellular coverage as it affects the methods that the emergency managers will use to alert and warn the public.³⁸ Without this information, the ability of first responders is compromised.

PG&E should promptly notify local government entities of the individuals, particularly medical baseline customers, whom the utilities were unable to contact.

There appears to be missing information on page 5-236 in the first bullet point in the paragraph titled “PSPS Event Notification and Coordination Strategy.”

H. Section 5.6.1.2 Costs of System Hardening Exceeding \$0.5 Million Per Customer

PG&E should be required to provide greater detail regarding the costs of system hardening to customers, pursuant to the requirements of the WMP Guidelines.³⁹ If PG&E does not have a cost analysis for all potential system hardening projects, PG&E should be required to provide the cost analysis information that it has to date. PG&E’s answer in this section, as it currently stands, does not adequately respond to the requirements of the WMP Guidelines.

I. Section 5.6.1.3 Wildfire Mitigation Strategy Impact on Construction and Upgrades

PG&E states that it “estimates a 10% reduction in vegetation-caused, equipment failure and animal-caused ignitions from the 2019 level due to planned System Hardening, Enhanced

³⁵ *Ibid.*

³⁶ *See also id.* at 5-299. Any concerns about confidential or proprietary information should be addressed if each government entity receiving cell tower information enters into confidentiality agreements with PG&E and the communication utilities.

³⁷ *See, e.g., id.* at 5-303.

³⁸ Coordination with operators of telecommunications infrastructure is also discussed in section 5.6.2 Protocols on Public Safety Power Shutoff. *PG&E’s 2020 WMP* at 5-283.

³⁹ *Administrative Law Judge’s Ruling on Wildfire Mitigation Plan Templates and Related Material and Allowing Comment*, California Public Utilities Commission, Attachment 1 at 83 (issued Dec. 16, 2019), <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M322/K133/322133494.PDF>.

Vegetation Management and tag repair work.”⁴⁰ However, the County is concerned that PG&E does not anticipate that the number of incidents per year due to equipment failure will change for certain types of equipment, such as pole failure, crossarm failure, conductor failure–wires down, fuse failure, capacitor bank failure, lightning arrestor failure, reclosure failure, guy/span wire failure, and sectionalizer failure.⁴¹ The number of incidents due to wire-to-wire contact/contamination is also projected to stay the same. PG&E should be required to clarify why the number of incidents due to failure of certain types of equipment and wire-to-wire contact/contamination will stay the same, despite plans to conduct system hardening, equipment upgrading, increased inspections, and implementation of situational awareness technology.

J. Section 5.6.2 Protocols on Public Safety Power Shutoff

The citation to “other Commission directives” in footnote 42 should include the proposed additional and modified PSPS guidelines issued by the Commission on January 30, 2020 and anticipated to be finalized in June 2020.⁴²

K. Section 5.6.2.1.2 Mitigating Impacts on De-Energized Customers

a. Community Resource Centers

The County supports PG&E’s representation that the CRCs will meet Americans with Disabilities Act requirements and that the CRCs will provide transportation for access and functional needs customers to and from the centers.⁴³ The County asks that PG&E specify how it plans to identify which access and functional needs customers need transportation, or how customers may request transportation. The County asks that CRCs be set up in areas known to the public, within a 30-minute driving distance from impacted customers. The County asks that the CRCs be operable 24 hours a day. The County asks that the CRCs also be accessible by public transit. The County asks that PG&E bear the costs of operating and supplying the CRCs with resources, including backup generation and security.

b. Coordination with Critical Facilities and Critical Infrastructure

The proposed additional and modified PSPS Guidelines issued by the CPUC on January 30, 2020 and anticipated to be finalized in June 2020 include a new definition of “critical

⁴⁰ *PG&E’s 2020 WMP* at 5-277.

⁴¹ *Id.* at 5-279 to 5-282.

⁴² *Id.* at 5-284 n.42.

⁴³ *Id.* at 5-290.

facilities and critical infrastructure.”⁴⁴ The County suggests that PG&E cite to the new definition as well.⁴⁵ As discussed above, the County asks that PG&E be required to provide backup power and refueling resources dedicated to critical infrastructure in High Fire Threat areas, such as critical facilities, cell towers, and repeater sites. The County also asks that PG&E be required to install solar-powered microgrids with battery storage in critical facilities, such as fire and police stations and hospitals, in High Fire Threat areas. As part of PSPS mitigation in 2020, PG&E should also be required to develop and implement a “real time” PSPS outage and re-energization platform that provides emergency managers with up-to-date information about areas within their jurisdictions that will be or are impacted by PSPS.

L. Section 5.6.2.4 Customer, Agency, and External Communications

a. Customer and Community Outreach

The County asks that PG&E specify how it will “account for input received from customers and communities gathered during the County and Customer Listening Tours held between December 2019 through February 2020.”⁴⁶ For example, what is the process by which the input will be reviewed? Which department at PG&E will be responsible for reviewing the input? If a change needs to be made to PG&E’s customer and community outreach protocols, what is the process by which the appropriate decision-makers will be notified?

In Section 5.6.2.4, PG&E summarizes the customer and community outreach efforts that it implemented in 2019. The County asks that PG&E clarify and/or include which of the efforts it plans to implement in 2020 and beyond.

b. Access and Functional Needs and Medical Baseline Customers

PG&E states that it will provide “cold storage (e.g., coolers) to low income and medically sensitive or access and functional needs customers in a high wildfire threat area who may benefit from a cold storage unit to help keep food items or medication from spoiling during a PSPS event.”⁴⁷ The County supports PG&E’s efforts and asks that PG&E specify how it plans to communicate with and identify the low-income and medically sensitive customers who may benefit from a cold storage unit and how the .

⁴⁴ *Administrative Law Judge’s Ruling Requesting Comments on Proposed Additional and Modified De-Energization Guidelines*, California Public Utilities Commission, Attachment 1 at 8 (Jan. 30, 2020), <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M325/K985/325985221.PDF>.

⁴⁵ See *PG&E’s 2020 WMP* at 5-292, 5-304.

⁴⁶ *Id.* at 5-298.

⁴⁷ *Id.* at 5-301.

c. Outreach Assessment

PG&E states that it “hosts website surveys that allow customers to provide direct feedback on the site page and topic.”⁴⁸ The County requests that PG&E’s PSPS webpage include a link to a PSPS-specific survey that customers can fill out after each PSPS event, which includes questions regarding whether PG&E adequately communicated with them, and allows the customers to provide direct, PSPS-specific feedback in a timely manner. The County also asks that PG&E provide a separate survey to local government entities and public safety partners after each PSPS event to gather feedback on local government-specific issues.

M. Appendix A to Confidentiality Declaration

PG&E states that it will not publicly disclose its assets due to public safety concerns.⁴⁹ Even if PG&E is not to disclose its assets publicly, PG&E should develop and implement a “real time” PSPS outage and re-energization platform, including a circuit map, that provides emergency managers with up-to-date information about the areas and circuits within their jurisdictions that will be or are impacted by PSPS. This type of information is critical for the County to be able to implement measures to protect the public living within a PSPS impacted area. If necessary, the County may enter into a standardized, Commission-approved Nondisclosure Agreement with PG&E regarding the information provided.

IV. Conclusion

The County appreciates the opportunity to provide comments on PG&E’s 2020 WMP and looks forward to continuing to work with the Commission to move towards the provision of safe, continuous, and reliable electricity services in 2020.

Respectfully submitted April 7, 2020, at San Francisco, California.

/s/ Tiffany M. Lin

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⁴⁸ *Id.* at 5-302.

⁴⁹ *Id.* at App 3-6 to App 3-7.

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