



November 30, 2020

California Wildfire Safety Advisory Board
505 Van Ness Avenue
San Francisco, CA 94102
Electronic Transmission of Four (4) Pages to:
wildfiresafetyadvisoryboard@cpuc.ca.gov

Subject: Acton Town Council Comments on the California Wildfire Safety Advisory Board
"Draft Guidance Advisory Opinion" issues November 13, 2020

Honorable Board Members;

The Acton Town Council ("ATC") respectfully offers the following comments on the Draft Guidance Advisory Opinion ("Opinion") issued November 13, 2020. The ATC only just Opinion today, and we understand that comments on this document are also due today. Therefore, and in the interest of brevity, we provide our comments in a "list" format that is arranged sequentially based on the page numbers of the Opinion.

Page 6 of the Opinion addresses (among other things) how utility "Risk Profiles" should be addressed in "Wildfire Mitigation Plans" ("WMPs"). The ATC agrees with the Board's comments, but we want to make sure that the Board is aware of certain risk elements that are associated with "Public Safety Power Shutoff" ("PSPS") activities which have heretofore been ignored in all the WMPs and PSPS "Post-Event Reports" that we have reviewed. Specifically, we seek to ensure that the Board is aware that PSPS activities actually pose a very real and substantial wildfire risk. This is not opinion; it is fact. For instance, at least two wildfires were ignited in 2019 as a direct result of residents trying to cope with SCE's excessive PSPS activities¹. One of these wildfire events (the "Tick" fire) was particularly devastating and it forced the evacuation of 40,000 people. A third fire (the "Maria" fire)

¹ The "Tick" fire was caused by a resident who was using a barbecue to cook a meal during an extensively long PSPS event initiated by Southern California Edison ("SCE"). The "Thief" fire was caused when vegetation was ignited by a generator that was being used by a resident during a different SCE PSPS event.

was also substantial, and it was initiated when electrical facilities owned by CRC were re-energized at the end of an SCE PSPS event. There is a direct causal link between PSPS and all of these fire events; the California Public Utilities Commission even predicted that such events would occur as a result of PSPS activities (see D.09-09-030 at 42). Yet it appears that the "Risk Profiles" developed by utilities fail to consider the very real and substantial wildfire risks that are posed by PSPS events. The ATC seeks to ensure that the Board is aware of this PSPS risk element, and we ask that it be factored into the Board's future consideration of utility "Risk Profiles"

Page 12 of the Opinion states: "For planning purposes, the Board understands that there is a distinction between being a resident of a community and being customer of a utility. The utility plan, while frequently a part of the municipal plan, should address the utility customer dimensions of emergency preparedness planning with respect to PSPS and wildfires and the unique concerns of more vulnerable customers such as: Access and Functional Needs, medical baseline, and non-English speakers." The ATC appreciates the Board's sensitivity toward vulnerable utility customers who are also residents of a community. We would like to take this opportunity share with you our experiences as rural residents who are uniquely vulnerable to PSPS events in ways that are not typical. For instance, most residents in Acton are entirely dependent on domestic wells; these wells operate via electricity, so when a PSPS event is initiated for days on end, our residents experience extreme hardship because they have no access to clean water for cooking or sanitary purposes. Well pumps are typically located far from the house, thus deploying a generator to power the pump is inadvisable due to the fire risk it poses. The ATC understands that the Commission has initiated programs to assist residents that depend on domestic wells through the deployment of battery backup devices to operate their well pumps during PSPS, however very few battery backup systems have been installed in Los Angeles County, so most of our residents remain exceedingly vulnerable to water supply problems during PSPS events (which often last for days). Additionally, when PSPS events are initiated in the Community of Acton, all communication platforms (internet, cell phone, and even land line services) are dropped within a few hours throughout much of our community. This is not supposed to happen, but it does anyway. For instance, in the PSPS event initiated in Acton just a few days ago on the morning of November 26, 2020 (Thanksgiving Day) telecommunication facilities went off line that day and they stayed off line until Saturday. These circumstances are particularly dangerous because they prevent residents from receiving mandatory evacuation orders. This is precisely what happened during the "Tick" fire in 2019: the lives of rural residents in North Los Angeles County were gravely endangered when evacuation orders could not be disseminated; when residents learned of their precarious situation (usually from friends and relatives who drove to their homes to let them know), they were forced to flee in complete and total darkness. Given these circumstances, the ATC respectfully requests that the Board include "rural residents" in the "vulnerable customer" category going forward.

Page 14 of the Opinion states: "For example, utilities with undergrounded powerlines pose a significantly reduced wildfire risk compared to those with overhead lines, but there are still risks of faults or ignitions if undergrounded lines or above-ground equipment is poorly maintained", and the Opinion then suggests that wildfire risks posed by such equipment could be analyzed as a "black swan" event (meaning that it could not possibly be predicted by engineering protocols). The ATC respectfully disagrees. The scenario described here is indicative of poor utility performance and utility maintenance operations which are so slack that they have caused facilities to impermissibly deteriorate to substandard levels; in such instances, engineering protocols absolutely predict failures that can (and do) lead to catastrophic events. Accordingly, the ATC believes that it is inappropriate to classify such a scenario as a "Black Swan event".

Page 15 of the Opinion states "Further, the Board would like information about any facilities that are exempt from G.O. 95. Is there an automatic exemption from G.O. 95 if a facility was built before G.O. 95 was published? Descriptions of G.O. 95 exempt equipment ought to be highlighted and inspection processes for exempted lines should be relayed to the Board as they relate to potential wildfire risk. The Board would like to understand how each utility identifies these risks on its own system and then better understand plans to mitigate the risk of exempt assets." The ATC greatly appreciates this comment, and we recommend that the Board request information pertaining to these non-compliant facilities in a "map" format indicating where the non-compliant structures are located and providing supplemental information tags indicating how and why they are sub-standard, when they were installed, whether upgrades are scheduled and if so, when will they occur. The ATC also respectfully requests that the Board seek clarification regarding the regulatory status of such non-compliant facilities; it is the ATC's understanding that, when GO-64A was adopted in 1928, it required all facilities constructed thereafter to meet the "light" and "heavy" cylindrical loading standards of 6 pounds per square foot ("psf") and 8 psf that were imposed therein. The ATC also understands that these requirements were enfolded in GO-95 when it was adopted in 1941 through operation of Rule 43.1 and 43.2 and that, through operation of Rule 12.1D, all replacement poles and associated facilities were to be constructed in a manner that complies with these requirements. Given that the loading requirements imposed by GO-64A have been in effect for more than 90 years and were re-affirmed when GO-95 was adopted nearly 80 years ago, and given the unlikelihood that distribution facilities in Tier 3 zones which were constructed before 1928 would still be in use today, it seems to the ATC that the majority of facilities which were originally "grandfathered" in by GO-64A and GO-95 have long since been replaced and that these circuits should now comply with the GO-95. However, it appears that this may not be the case. The ATC seeks to understand why that would be, therefore we support this recommendation, and we ask that it be expanded to fully illuminate the totality of the circumstances surrounding non-GO-95 compliant facilities.

Pages 16-17 of the Opinion states "To assist in evaluating each WMP, the Board requests utilities describe and evaluate what vegetation and vegetation management practices reduce wildfire related risk and the ecological impact of the treatment options chosen. Utilities should address the specific method methods employed to remove trees around power lines and their unique standards for vegetation from the trees to sky or for radial clearance from the line." The ATC agrees with this recommendation; however, we request that it be expanded to address whether the utilities' vegetation management practices change when the circuits in the vicinity of the vegetation are equipped with covered conductor. This matter is of substantial importance to the Community of Acton, because SCE intends to install covered conductor on most (if not all) of the above-ground distribution facilities within the Community. The ATC has been informed that this will reduce the frequency and duration of "Public Safety Power Shutoffs" ("PSPS"), thus we are keenly interested in all aspects of PSPS decisional factors (including vegetation management and vegetation conditions).

The ATC appreciates this opportunity to provide comments on the Board's DRAFT GUIDANCE ADVISORY OPINION. If you have any questions or require additional information, please do not hesitate to contact the ATC at atc@actontowncouncil.org.

Sincerely,

/S/ Jacqueline Ayer
Jacqueline Ayer
Utilities Committee Chairperson,
The Acton Town Council