



October 1, 2020

California Wildfire Safety Advisory Board  
505 Van Ness Avenue  
San Francisco, CA 94102  
[wildfiresafetyadvisoryboard@cpuc.ca.gov](mailto:wildfiresafetyadvisoryboard@cpuc.ca.gov)

Dear Chair Edwards and Board Members,

Thank you for inviting the California Community Choice Association (CalCCA) to present our recommendations on your important work at the September 23 meeting. We are very happy the California Wildfire Safety Advisory Board (CWSAB) is taking on this vital work. During our presentation, Vice Chair Fellman requested a written copy of our recommendations, which we include in this letter.

CalCCA is a member association representing 23 of the 24 operational community choice energy programs in California. Our members are local government agencies who are the default electricity providers within their communities. Community choice programs are often referred to as “CCAs,” which stands for Community Choice Aggregators, because they join together, or aggregate, to purchase energy.

CCAs have grown quite a bit over the past ten years. They now serve more than 10 million customers in 170+ cities and counties in California and collectively serve 28 percent of the load in the service territories of the three main investor-owned utilities (PG&E, SCE, and SDG&E).

Relevant to wildfire safety, CalCCA’s member governments represent some of the highest fire threat regions of California, including portions of the Sierra Foothills, North Bay forests, Mendocino and Humboldt Counties, Central Coast forests, and parts of the Antelope Valley, Los Angeles County and San Diego.

As such, we help coordinate and support regulatory input into wildfire safety where it overlaps with the CPUC’s jurisdiction. Our members contributed in June to the [Joint Local Governments’ Comments](#) on Draft 2021 Wildfire Mitigation Plan Guidelines, Performance Metrics and Safety Culture.

We know that some fires are utility-caused and others not. Our members, as local government agencies, believe both kinds of risks can be mitigated through the following steps:

- Address the climate crisis by rapidly reducing overall greenhouse gas emissions;
- Reduce the risk of human-caused fires, including utility-caused fires; and
- Change how all fires burn (e.g., forest management to encourage “low and slow” fires) and reduce the harm that fires cause with changes in zoning and firefighting techniques and equipment.

We understand the CWSAB’s scope focuses primarily on reducing the risk of utility-caused fires, but we encourage the board to also capture and publicize solutions that address the other points – particularly where the utilities have data or special knowledge. There are critical dependencies between utilities and governments, such as the utility’s research and knowledge about fire threats connected to specific species of trees and municipal tree ordinances and vegetation management requirements.

Utilities are also developing fire threat assessment tools that can change the mapped threat areas in real-time to adjust for actual wind conditions. That information and the underlying tools should be shared with our members' first responders to help plan for proactive dispatch of crews. We are confident there are other similar dependencies that could emerge with a deep dialog that includes emergency responders and municipal operators.

Most importantly, CalCCA wishes to be an asset to the CWSAB and the CPUC in this process and far into the future. We want to help because our members' regions are heavily impacted. We provide the following specific recommendations at this stage of your work:

1. **Identify critical loads with significant input from CCAs.** CCAs are governed by local governments and are connected to both local first responders and the communities they serve. As such, the identification of critical loads should be done with significant input from CCAs and our local government members. Investments that allow circuits with critical loads to remain energized through adverse weather conditions should be prioritized over other investments.
2. **Make transparency of data and tools the default for the IOUs.** Confidentiality should only be allowed when the CPUC determines it is essential for public safety, and not to restrict customers and local governments from solving PSPS and other problems. To illustrate this point, it has taken significant time to get PG&E to share fire threat maps with the Sonoma Clean Power Authority's local first responders, following the 2017 fires in Sonoma and Mendocino Counties. And still, today, CCAs are unable to get specific location information for grid segmentation devices or any engineering analyses or cost studies related to the feasibility for repairing/hardening the grid – data which are essential prior to making investments in storage and microgrid systems. Without information like this, we will end up with significant stranded assets due to the over construction of customer- and CCA-owned DERs, and all kinds of permanent microgrid systems.
3. **Use CCAs as an asset that can organize local governments to provide clear guidance to the CPUC on tough decisions.** CCAs can get direction from governments on what they want an IOU to do when the cost of eliminating PSPS events altogether is extremely high. Some regions may wish to prioritize investments that significantly reduce the length of time and/or number of affected customers from PSPS events over eliminating PSPS events altogether when there is significant ratepayer savings.
4. **Rely on CCAs to identify government partners to the CPUC and organize their participation in IOU projects.** Many of our member governments are actively working on solutions to PSPS events, including offering battery incentives, technical support for backup power systems, grid analysis to identify potential grid repairs and modifications, and constructing microgrids. CCAs can help identify those government partners to the CPUC and organize their participation in IOU projects. Where there is local interest, IOU investments in microgrids should be made only in close coordination with local governments due to the importance of understanding local needs.
5. **Costs of new utility-owned microgrids should be compared against two alternatives before they are made:** (a) the cost of repairing/hardening the transmission and/or distribution lines to a sufficient level to avoid most PSPS events; and (b) the cost of local-government owned and operated microgrid system (if one is proposed).

6. **CCAs should be tapped to help collect and organize locational information from air districts and local governments.** Community choice providers can assist in gathering data regarding the locational sensitivity to generator emissions, and to advocate for clean air and renewable solutions where necessary. Some governments have determined that no diesel or natural gas should be used to avert PPS events, while others are more flexible so long as the impacts are minimized.

Thank you for your consideration.



Beth Vaughan  
Executive Director