



**CITY OF LAKEPORT**  
Community Development Department

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Michael Picker, President  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Submitted via email: [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov)

**RE: Proceeding R. 18-10-007 Wildfire Mitigation Plan**

Dear President Picker:

The City of Lakeport appreciates the opportunity to comment on proceeding R. 18-10-007 regarding investor owned utility wildfire mitigation plan. Lakeport understands the importance of wildfire mitigation planning, being located in Lake County which has been highly affected by devastating wildfires the past four (4) straight years (Rocky, Jerusalem, Valley, Clayton, Sulphur, Pawnee and Mendocino Complex). The most recent fire in July and August of 2018, the Mendocino Complex Incident, resulted in the complete evacuation of the City of Lakeport for five (5) days.

Lakeport is extremely grateful to the immediate assistance provided by the many utility companies, especially PG&E, during both the disaster and recovery period of each of these wildland fire incidents. Their assistance has been critical in the recovery of local residents and businesses.

However, Lakeport does have some grave concerns over the recently implemented policies and practices of PG&E specifically, as it relates to decisions to preemptively shutoff electrical service to residents when extreme fire danger conditions exist. Although not physically affected by de-energization of electrical service in both October and November of this year, mixed information provided by PG&E resulted in school closures and extra staff hours on the part of the City to position emergency power generation equipment to support critical infrastructure. Lakeport requests additional efforts be made on the part of large Utility Companies to communicate better with local jurisdictions on decisions to preemptively shutoff electrical service to local residents. This should include:

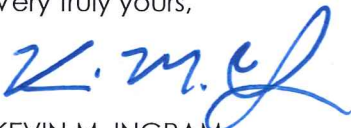
- Utilities must recognize that the community identified by a particular zip code is extremely different than that of an incorporated boundary of a City. For instance all lands that make up the 95453 zip code of Lakeport represent approximately 84 square miles whereas the incorporated area of Lakeport constitutes only 2.5 square miles. This detail led to a great deal of confusion for the residents of Lakeport, as I am sure it did for many other rural communities around the state during the pre-emptive electrical power shutoffs of October and November of this year.

- There seems to be a disconnect at PG&E on who is notifying whom of potential electrical power de-energization decisions. Information provided from State and Regional PG&E sources often contradict the information that is provided to City Officials from local PG&E representatives. This has created unnecessary confusion. Lakeport suggests that the same protocols that work successfully during actual wildland fire events where information is provided from the local PG&E representative to City Officials be utilized as part of decisions to pre-emptively shutoff power when high risk wildland fire hazards exist.
- Improve mapping of Tier 3, Tier 2 and Tier 1 potential shutoff areas. Currently these mapped areas do not reflect actual grid configuration.
- The *Community Wildfire Safety* page of PG&E's website does contain some good information however it seems to be scattered around in different locations. Lakeport requests that PG&E provide local communities a fact sheet with pertinent information including web links that we can then also distribute to residents to ensure that the information being provided is accurate and consistent.

To summarize, Lakeport suggests that PG&E protocols and communication regarding decisions to pre-emptively shutoff utility services when severe wildland fire hazards exist be refined to operate more in practice with the structure that exists during that of wildland fire events. These same protocols should also be adopted and put into practice by other investor owned utilities as well. For instance, Lakeport has found AT&T to be extremely non-communicative even the smallest incidents. Uniform practices regarding the communication of information should be adopted by all utility agencies under the purview of the CPUC. It is also imperative that these communication practices include direct contact with affected local jurisdictions in a timely manner.

If you have any additional questions or concerns please do not hesitate to contact me.

Very truly yours,



KEVIN M. INGRAM  
Community Development Director