

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)

Rulemaking 18-10-007
(Filed October 25, 2018)

**COMMENTS OF CONTRA COSTA WATER DISTRICT
ON ORDER INSTITUTING RULEMAKING TO IMPLEMENT ELECTRIC UTILITY
WILDFIRE MITIGATION PLANS PURSUANT TO SENATE BILL 901 (2018)**

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November 14, 2018

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In accordance with Rule 6.2 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, Contra Costa Water District (“CCWD”) submits comments on the Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901. As discussed below, CCWD’s primary interest in this proceeding is to ensure that the electric utility wildfire plans filed pursuant to Senate Bill 901 (“SB 901”) prioritize coordination with water utilities, particularly with respect to utility de-energization protocols.

I. Background

CCWD is a California municipal utility district providing critical water supplies, including drinking water and firefighting flows, to over 500,000 people in the eastern San Francisco Bay area.

After the issuance of Resolution ESRB-8 in July 2018, CCWD was contacted by Pacific Gas and Electric Company (“PG&E”) regarding the development of protocols for de-energization as a response to extreme fire risk. These informal discussions have been useful as a first step. However, in light of the recent North Bay de-energization event on October 14, 2018, and communication issues during the same time frame regarding a potential de-energization in the East Bay, CCWD has come to realize there is an immediate need for clear guidelines to ensure that impacts on water supply are included in any de-energization decision, and also in the

notice and restoration processes. This rulemaking proceeding provides a good opportunity for CCWD and other affected parties to provide information that can inform the process and mitigate the impacts of de-energization on water utilities.

II. Comments

This rulemaking has been designated for development of interim wildfire mitigation plans pursuant to Public Utilities Code section 8386, as modified by SB 901. The Commission will consider how to interpret and apply the list of required plan elements, as well as whether additional elements beyond the statutory list should be included in utility wildfire mitigation plans.¹ Parties will be asked for specific and detailed input on their interpretation of Section 8386, including the meaning of the provisions listed for inclusion in the plans.² CCWD supports and appreciates this inclusive approach to the proceeding. Since wildfire mitigation measures may have impacts beyond the electric utility's operations and raise a variety of complex health and safety issues, input from all stakeholders will be essential. CCWD also appreciates the Commission's recognition that we need to have initial wildfire mitigation plans in place as soon as possible.

CCWD's primary concern in this proceeding is that the de-energization protocols and notice procedures consider all potential impacts on water supplies. De-energization of a region may help prevent ignitions during high wind conditions. However, de-energization can also threaten public health and safety by limiting a water utility's ability to maintain water pressure and storage, directly affecting the availability of water for firefighting and water quality for local residents.

¹OIR, pp.4-5

²Id. p.5.

Energy and water supply are inextricably connected. Water storage at upper elevations is limited. If water utilities are not given time to prepare, de-energization of pump stations will eventually lead to a loss of supply, which could affect firefighting capabilities and water pressure. When potable water distribution systems have inadequate pressure, the likelihood of drinking water contamination goes up dramatically. Subsequent disinfection activities after a depressurization could deprive residents of potable water for days.

To mitigate these risks, the Commission's instructions for initial wildfire mitigation plans should include an express requirement that impacts on water supply be identified and considered before a decision is made to employ de-energization as a wildfire mitigation tactic. If de-energization is necessary, advance notice to water utilities is imperative to allow water utilities to increase pumping prior to de-energization, maximize water storage in the affected areas, and strategically deploy portable generators and pumps.

Notice information needs to be detailed and directed to designated contact persons. Notification must also be tailored to the needs of water agencies. For example, electric utility systems designed to send out customer notifications according to street address are completely inadequate to enable response by water agencies because our facilities may not be linked to a local street address, our accounts may be associated with a central office location rather than local street address, and water system management requires an understanding of the electric utility's intended de-energization planning at a circuit level. Once de-energization has occurred, there must be ongoing and open channels of two-way communication between the electric and water utilities' operation centers. This communication protocol will facilitate ongoing coordination and will enable the water utility to submit a preferred prioritization order for restoration of power to critical water facilities.

III. Categorization, Scope, Hearings, Schedule

CCWD has no additional comments at this time regarding the proposed categorization, need for hearing, and issues. As noted above, CCWD supports the expedited schedule for development of instructions and the submission of the initial utility wildfire mitigation plans. In order to ensure that the recommendations of affected stakeholders are reflected in the utilities' plans, we recommend the addition of one step in the schedule. After parties file comments on the Commission's instructions for the initial plans, it would be useful to add a placeholder for the Commission's issuance of "revised" or "final" instructions. While the Commission's initial instructions will likely reflect input offered by some parties in these initial comments on the OIR itself, more detailed and specific recommendations will likely be provided in parties' comments on the initial instructions. Issuance of revised instructions will provide the electric utilities clear direction as to what should and should not be included in the wildfire mitigation plans.

IV. Conclusion

The Commission has taken a very important step in initiating the coordinated development of electric utility wildfire mitigation plan. CCWD looks forward to contributing to this process.

Dated: November 14, 2018

Respectfully submitted.

By: 

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