



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

June 24, 2020

Caroline Thomas Jacobs
Director, Wildfire Safety Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Submitted via email to wildfiresafetydivision@cpuc.ca.gov

RE: Wildfire Safety Division's Proposed Strategic Roadmap

Dear Ms. Jacobs:

On behalf of the Rural County Representatives of California (RCRC), we appreciate your request for stakeholder feedback, including being given an adequate time to do so, on the Wildfire Safety Division's (WSD's) Proposed Strategic Roadmap, "Reducing Utility Related Wildfire Risk: Strategy and Roadmap for the Wildfire Safety Division." RCRC is an association of thirty-seven rural California counties, and our Board of Directors is comprised of one elected county supervisor from each of our member counties.

RCRC is an active participant in the Wildfire Mitigation Plans Proceeding, as well as interrelated proceedings such as De-Energization, Microgrids, and the Emergency Disaster Relief Program.¹ Additionally, RCRC is a member of the Forest Management Task Force and its Governments for Forest Health Work Group, focusing on local government perspectives to promote healthy, resilient forests that can adapt to the occurrence of climate change factors such as prolonged droughts and wildfire. Also, because our counties are disproportionately impacted by homeowners' insurance cancellations and non-renewals following years of devastating wildfires, our Board of Directors created a Homeowners Insurance Ad Hoc Committee to discuss solutions for our rural residents. Suffice it to say, we have a comprehensive interest, engagement level and expertise in forest management, community resilience and wildfire issues.

The initial strategy for the WSD is welcome and provides an important foundation not only for a meaningful vision, but it provides an appropriate level of transparency

¹ R.18-10-007, R.18-12-005, R. 19-09-009, and R.18-03-011, respectively.

toward its goals and execution. We request the WSD include a transition plan or more explicit public process protocols for stakeholders to meaningfully engage in once the WSD moves from the CPUC's deliberative process and over to the California Natural Resources Agency per 2019's Assembly Bill 1054 (Holden). Developing and finalizing wildfire safety and mitigation performance metrics cannot be done in a vacuum, especially without reflecting decades of expertise collected by communities and member of the public who live in the wildland-urban interface that have experienced fire events, or from local governments whose constituencies are profoundly impacted by utility safety measures such as de-energization procedures and vegetation clearing. Including the local perspective as one of the four main principles for the WSD's review of wildfire mitigation strategy is sound.

As the WSD embarks on the tall task of ensuring utilities have a culture of safety and accountability, this Roadmap sets the right tone. We appreciate the WSD consulting with the Forest Management Task Force (FMTF). The FMTF is a crucial link in the long-term vegetation management efforts of the state and the reduction of ineffective fire suppression policies that have perpetuated the overstocked and unhealthy condition of California's forests and wildlands. We wholeheartedly agree that the approach of wildfire mitigation is not for more standalone programs or activities at the utility level—which are a costly ratepayer exercise—but instead utilities must deepen their collaboration with other agencies and communities.²

Without robust vegetation management efforts from state, local, and federal partners, in addition to the responsibilities of electrical utilities, Public Safety Power Shut-offs (PSPS) will remain an over utilized tool as a wildfire mitigation strategy. We agree with the characterization that PSPS plays a central role in WMPs³ and there is a strong incentive to use it as wildfire mitigation tool⁴, especially considering the utilities have unilateral legal authority to employ PSPS and not suffer any direct costs or economic harm borne by communities and vulnerable customers as a result of their use. To that end, including the context that nowhere else in the world is PSPS a regular part of operations to respond to the weather is a valuable acknowledgement.⁵ We must limit, if not endeavor to phase-out on a long-term basis, the use of PSPS once utility equipment is better safeguarded. Once utilities can fulfill their obligation to meet best practices and safety standards, customers and communities should not endure the health and safety risks caused by unreliable electricity.

Thank you for your consideration of our comments. Please do not hesitate to contact me if you have questions or would like to discuss further at (916) 447-4806 or sheaton@rcrcnet.org.

² Reducing Utility Related Wildfire and Risk: Strategy and Roadmap for the Wildfire Safety Division, page 21.

³ Ibid, page 29.

⁴ Ibid; Appendix 1, page 9

⁵ Ibid; Appendix 1.

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Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton". The signature is fluid and cursive, with a large loop at the end.

STACI HEATON
Senior Regulatory Affairs Advocate

cc: Service List, R.18-10-007