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)

ACTON TOWN COUNCIL SUPPLEMENTAL COMMENTS ON THE 2021 WILDFIRE MITIGATION PLAN UPDATES FILED BY THE LARGE INVESTOR OWNED UTILITIES

Jeremiah Owen, President
THE ACTON TOWN COUNCIL
P.O. Box 810
Acton, CA 93510
(661) 468-7496
atc@actontowncouncil.org

March 29, 2021

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In accordance with Resolution WSD-011 adopted November 20, 2020 by the Wildfire Safety Division ("WSD") of the California Public Utilities Commission ("Commission") on November 20, 2020 as modified by the March 1, 2021 Commission letter extending the comment deadline to March 29, 2021, the Acton Town Council hereby submits the following Supplemental comments on the 2021 Wildfire Mitigation Plan ("WMP") Updates filed by the large Investor Owned Utilities ("IOUs").

1.0 SUPPLEMENTAL COMMENTS

On March 18, 2021, the Acton Town Council submitted comments to the WSD on the large IOU 2021 WMP Updates, and we were advised that the deadline for submitting comments had been extended to March 29, 2021. Accordingly, we have prepared the following supplemental comments which augment our initial comments submitted on March 18.

In the initial comments submitted by the Acton Town Council, we set forth in detail our concerns with the PSPS protocols described in SCE's and PGE's 2021 WMP Update that appear to controvert Commission's Resolution ESRB-8 and various Commission Decisions which establish clear restrictions on when Public Safety Power Shutoff ("PSPS") events are authorized by Pub. Util. Code §399.2(a) and §451. These comments explained that PSPS events are not "reasonable" and do not comport with ESRB-8 or other Commission Decisions if they are initiated out of concern that equipment deficiencies could result in wildfire ignitions or under "Black Swan" conditions where winds pose no "imminent or significant" risk of toppling

equipment or causing "vegetation related impacts". The Acton Town Council is not disputing whether such power shutoffs are necessary for public safety; rather we are explaining why they would not be deemed "reasonable" as that term is contemplated in Resolution ESRB-8 and Decision D.19-05-042. To clarify the matter, the Acton Town Council points to a recent Discovery Response submitted by SCE to the CPUC Public Advocates Office (Cal Advocates) which indicates that SCE's de-energization decisions in Acton are driven by distribution equipment that does not appear to comply with structural standards imposed by General Order 95 ("GO95"). Specifically, the Discovery Response (provided in Attachment A) explains that, for the "Shovel" circuit in Acton, SCE has established very low PSPS windspeed thresholds of only 25 mph (sustained) and 40 mph (gusts) out of concern that its equipment could experience mechanical failure at sustained windspeeds of 31 mph and wind gusts of 46 mph (far below the wind load standards set by GO95[1]). This Discovery Response affirms that mechanical failure concerns drive SCE's PSPS decisions in Acton; while such shutoffs may be necessary for public safety purposes, they are nonetheless "unreasonable" because SCE has a duty to maintain its equipment in compliance with GO95. This is why it is critical that the PSPS elements of all the IOU WMPs be expanded to: 1) Identify the location of structurally deficient items on the utility's circuits; 2) Explain how these equipment deficiencies are factored into PSPS decisions; and 3) Explain whether these equipment deficiencies result in "downward adjustments" to PSPS windspeed thresholds. If these issues are not addressed by the IOU WMPs and subsequently disclosed in Post Event Reports, then the Commission will not be able to conduct mandatory post event "Reasonableness Reviews" of IOU PSPS events.

Another concern raised by SCE's Discovery Response to CalAdvocates is that SCE apparently believes that there are only "roughly a dozen" circuits that, like the "Shovel" circuit in Acton, have PSPS windspeed thresholds "marginally" less than 31 mph (sustained) and 46 mph (gusts). This is incorrect: The Post Event Report addressing SCE's January 2021 PSPS activities (dated February 4, 2021) shows that nearly 50 circuits[2] have windspeed thresholds below 31/46 mph. These circuits are listed in Table 1.

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[1] As discussed in Footnote 1 of the Acton Town Council's Initial Comments, D.14-02-015 establishes that electrical equipment should withstand wind levels exceeding 56 mph based on the combined wind load and safety factor requirements of GO-95 (see Pages 56-58).

[2] See pages 7-12 of Attachment A of SCE's Post Event Report dated February 4, 2021.

SCE's PSPS Wind Thresholds for the De-Energization Events of January 14-19.

	Circuit	Sustained Wind threshold (mph)	Wind Gust Threshold (mph)
1	SHOVEL (portion)	23	36
2	METTLER	21	33
3	MIDDLE ROAD	21	33
4	COVENTRY	25	36
5	SHERWOOD	25	36
6	HILLCREST	26	37
7	ACCENT	27	38
8	CONINE	27	38
9	JONAGOLD	28	39
10	VARGAS (portion)	26	39
11	EASTER	27	39
12	SUTT	26	39
13	ECHO	26	39
14	SAGINAW	24	40
15	MACIEL	26	40
16	HONEYCRISP	27	40
17	CORSAIR	28	40
18	ESTABAN	28	40
19	COBRA	31	40
20	ANACONDA	31	40
21	GREEN RIVER	31	40
22	BELPAC (portion)	31	40
23	SAND CANYON	28	41
24	CUTHBERT (portion)	28	41
25	DAVENPORT	28	41
26	LOUCKS (portion)	28	41
27	PLATEAU	28	41
28	BIG ROCK (portion)	28	41
29	ENERGY (portion)	28	41
30	GUITAR	28	41
31	BLACKHILLS (portion)	28	41
32	NORTHPARK (portion)	28	41
33	TWIN LAKES (portion)	28	41
34	ANTON	28	41
35	CALGROVE (portion)	28	41
36	FROZEN	28	41
37	CONDOR	28	41
38	GNATCATCHER	28	41
39	PICK	28	41
40	PYTHON	28	41
41	VETERANS	28	41
42	DE MILLE	28	41
43	LOPEZ	28	41
44	BOUQUET	28	41
45	ESCONDIDO	28	41
46	LYONS	28	41
47	TAPO (RAR6509)	28	41
48	STEEL	29	41

These data indicate that Acton is not the only community where SCE has initiated power shutoffs based on low windspeed thresholds; however, it is not known whether these low windspeed thresholds are driven by equipment deficiencies or whether, by extension, the PSPS events themselves are "unreasonable" pursuant to ESRB-8. This is why it is important that each WMP provide detailed information regarding the scope and extent of structural deficiencies which drive PSPS decisions; without such information, the Commission is unable to properly conduct the "Reasonableness Reviews" that D.19-05-042 establish as an "imperative".

2. CONCLUSION

For all the reasons expressed in our initial comments on the large IOU 2021 WMP Updates and supplemented herein, the Acton Town Council respectfully requests that the Commission not approve the PSPS component of any IOU WMP until the following conditions are met:

- The PSPS protocols are revised to properly reflect the restrictions and conditions that the Commission has imposed on de-energizations activities as set forth in ESRB-8 and D.19-05-042 which authorize PSPS when there is an "imminent and significant risk" that structurally competent electrical equipment will topple or experience "vegetation related impacts".
- The utilities provide substantial technical evidence to support claims regarding the windspeed thresholds at which windblown vegetation becomes an "imminent and significant" threat.
- SCE must explain why it initiates PSPS when conditions are not "extreme" by relying on an FPI threshold of only 12 *particularly in light of the compelling evidence provided in SDGE's 2021 WMP which demonstrates that "extreme" conditions do not exist until the FPI reaches 14.*
- The IOUs provide substantive evidence that their "ignition consequence", "fire spread potential" and/or "wildfire propagation" models accurately represent "real world" circumstances and accurately project "real world" outcomes.
- The PSPS protocols in the IOU WMPs must describe in detail the methodology that will be used to identify and quantify the very real and substantial public safety hazards and risks posed by PSPS and furthermore explain the process that will be used to show how these hazards and risks are deemed to be outweighed by a material public safety benefit.

Respectfully submitted,

/S/ Jeremiah Owen
Jeremiah Owen, President
The Acton Town Council
P.O. Box 810
Acton, CA 93510
(661) 468-7496
atc@actontowncouncil.org

March 29, 2021

ATTACHMENT A

SCE DISCOVERY RESPONSE TO CALADVOCATES DATED MARCH 9, 2021

Southern California Edison

WSD-011 – Resolution implementing the requirements of Public Utilities Code Sections 8389(d)(1), (2) and (4) related to catastrophic wildfire caused by electrical corporations subject to the Commission's regulatory authority

DATA REQUEST SET CalAdvocates-SCE-2021WMP-09

To: Cal Advocates
Prepared by: Kyle Ferree
Job Title: Senior Advisor
Received Date: 3/4/2021

Response Date: 3/9/2021

Question 014:
The following questions relate to the use of live field observers (LFO) immediately prior to and during a PSPS event.
In its 2021 WMP, SCE states that:
SCE considers the National Weather Service Wind Advisory levels (defined as 31 mph sustained wind speed and 46 mph gust wind speed) and the 99th percentile of historical wind speeds in the area to set activation thresholds.
However, in a response to the Acton Town Council's discovery request, SCE states that:
After determining the modified multiplier, we must determine if it's to be applied to the circuit's "Wind/Gust Threshold" or its "99th Percentile" threshold. The "Wind/Gust Threshold" is determined by historical wind-related outages and the "99th Percentile" threshold is determined by the 99th percentile of historical wind speeds recorded for the circuit.
Is the Wind/Gust Threshold the same as SCE's use of NWS Wind Advisory level of 31 mph (sustained) and 46 mph (gust)? If not, explain which criteria SCE currently uses.

Response to Question 014:
In almost all cases, SCE uses the lower of the NWS Wind Advisory level of 31 mph (sustained) and 46 mph (gust) or a circuit's 99th percentile wind speed to perform PSPS notifications and Incident Management Team activation.

However, roughly a dozen SCE distribution circuits have outage-informed thresholds that are marginally lower than the NWS Wind Advisory level of 31 mph (sustained) and 46 mph (gust). These circuits have sustained concerning historical outages at wind speeds lower than the NWS Wind Advisory level and have had their threshold capped until completed maintenance has demonstrated the ability for each circuit to sustain higher wind speeds.

An example of this treatment was seen on the Shovel circuit in Acton in 2020. SCE was able to raise Shovel's outage-informed threshold of 25 mph (sustained) or 40 mph (gust) to the NWS Wind Advisory level. This occurred in late 2020 after confirming that key outstanding maintenance was completed and that the circuit was able to withstand NWS Wind Advisory level wind speeds without mechanical failure.