CITY OF MOORPARK

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December 11, 2018

SENT VIA E-MAIL

Michael Picker, President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
public.advisor@cpuc.ca.gov

RE: Proceeding R. 18-10-007 Electric Utility Wildfire Mitigations Plans Pursuant to SB 901 (2018)

Dear President Picker:

The City of Moorpark appreciates the opportunity to comment on Proceeding R. 18-10-007 to implement electric utility wildfire mitigation plans pursuant to Senate Bill 901 (2018). We appreciate the Commission's leadership in addressing the increasingly frequent and destructive wildfires in California, and we respectfully request that the CPUC **require Wildfire Mitigation Plans to include addressing the impacts of deenergizing on local governments and the need to notify local governments of deenergizing.**

Public Utilities Code Section 8386(c), as enacted by SB 901, lists various items that must be included a Wildfire Mitigation Plan, including "Any other information that the [CPUC] may require." [Section 8386(c)(20)] Specifically, the City requests that the CPUC exercise this authority to expand the requirements contained in Sections 8386(c)(6) and 8386(c)(7) to include local governments as parties to be addressed in Wildfire Mitigation Plans, as follows:

(6) Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders, local governments, and on health and communication infrastructure.

(7) Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, local governments, health care facilities, and operators of telecommunications infrastructure.

JANICE S. PARVIN, Mayor | ROSEANN MIKOS, Ph.D., Councilmember | DAVID POLLOCK, Councilmember | KEN SIMONS, Councilmember | CHRIS ENEGREN, Councilmember

Many of the core tenets of a Wildfire Mitigation Plan will involve mobilization of local government assets. When the electrical distribution system is deenergized, for example, local government Public Works workers switch traffic signals to four-way flashes in order to preserve signal battery life. They also often deploy stop signs to further ensure drivers stop at intersections if signals go out completely. Ensuring that local governments are aware of any pending deenergization of the distribution is critical to mitigating the effects of deenergizing.

Further, many preventive measures are largely implemented by local governments. If, for example, our local electrical utility proposed an expanded brush clearance around above-ground utility lines, the City would likely be involved in implementing it. Further, insofar as the City owns a significant amount of land traversed by above-ground utility lines, brush clearance efforts may well be performed directly by the City.

By considering and proactively addressing these concerns within the Wildfire Mitigation Plans, the electric utilities and their plans will have the greatest chance for success as all Californians work toward mitigating the effects of wildfires across the state.

Thank you for considering our comments.

Yours truly,

Troy Brown
City Manager

cc: City Council (via E-mail)
Sean Corrigan, City Engineer/Public Works Director (via E-mail)
League of California Cities, D. Mullinax (via E-mail)
League of California Cities, M. Desmond (via E-mail)