CITY OF Fremont

Fremont Fire Department
3300 Capitol Avenue, P.O. Box 5006, Fremont, CA 94537-5006

December 12, 2018

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

Attn: Proceeding R. 18-10-007 Wildfire Mitigation Plans

Dear President Picker,

The City of Fremont Fire Department appreciates the opportunity to comment on the requirements of Senate Bill 901 (R- 18-101007) regarding Wildfire Mitigation Plans. As the City of Fremont has extensive housing in our local Wildland Urban Interface and contains significant electrical distribution infrastructure for the Bay Area, with PG&E classifying the Fremont hills as a High Fire Threat Area in their mapping, we believe the success of adequate Wildfire Mitigation Plans are extremely important to the safety of our residents.

Due to the impact a Wildfire Mitigation Plan concerning utilities could have on our local community, the City of Fremont Fire Department strongly urges the CPUC to work closely with local governments to learn of already existing best practices. Below are comments and questions we are submitting regarding the proposed Wildfire Mitigation Plans and Electric Utilities:

The comments below are organized into key categories of wildfire mitigation: Prevention, Preparation, Notification, and Recovery. We are urging the CPUC to strongly review and take these questions into consideration before finalizing the plan.

1. *Prevention*- It is the City of Fremont's interest that wildfire ignition by electric power distribution be prevented. The elimination of electrical ignition by shutting down the power is our last choice as this method inconveniences and endangers our citizens for what is at the time of the shut down only a potential wildfire threat. Please take into account the following questions when formalizing the Wildfire Mitigation Plan.

- Is the Utility considering hardened infrastructure like insulated power lines and underground electrical distribution?
- How will the Utility prevent trees from damaging electric lines and how will you reduce the likelihood of a receptive fuel bed below electric lines?

2. *Preparation*- If the Utility intends to use electrical power interruption as a primary method of preventing wildfire ignition, then they should be responsible for helping Fremont and its citizens prepare for that interruption. The CPUC should consider answering the following questions when providing information about mitigation plans.

- Will a database of Fremont Citizens that are dependent on electrical medical devices be created and maintained? Will the Utility work with those citizens to provide uninterruptable power supplies?
- Will a database of critical infrastructure like hospitals, traffic lights, fire stations, water pumps, etc. be created and maintained? Will the Utility work with them to ensure an independent power sources?

3. *Notification*- The City of Fremont has already had an experience with this process and we need to know much more about how it works. We urge the CPUC to provide more information to local governments regarding this issue.

- What are the specific trigger points that initiate a power shut down. What temperature? What relative humidity? What wind speed and direction? Is action taken on actual weather data or predictions for weather?
- How is weather data being collected? Where are these sensors located? How does data taken in other areas affect Fremont? How can Fremont access these data streams?
- How does the Utility determine what specific areas will be affected? Can Fremont receive a summary of affected addresses and areas via email?
- Who decides to issue a notification? Who authorizes an actual Public Safety Power Shutdown? Is it a computer algorithm or a human assessment?
- How will the general public be notified? Will the notification system be opt in, opt out, or mandatory? Will there be redundant notifications using multiple technologies (i.e. email, landline, and AM radio)? How will updates be made if the power is out?
- Fremont has a significant manufacturing, research, and industrial base dependent on electrical power the prolonged loss of which could result in a hazardous or other emergency. Will they be included in a list of notifications?
- Will notifications include warnings about the dangers of carbon monoxide poisonings resulting from portable generators used inside during power outages?
- What should our citizens do in response to this notification? What should a City of Fremont decision maker do if they are notified of a shutdown?

4. *Recovery*-A recent Public Safety Power Shutdown in the Northern Bay Area resulted in a multi-day power outage. From our experience, we felt that it would have been helpful if we understood the process better. We suggest the CPUC use the Wildfire Mitigation plan to explain this process better. Below are some questions we suggest should be answered.

- Once a decision to shut down power has been made will utility resources be prepositioned to get the power back on as soon as possible?
- What are the trigger points that allow the power to be turned back on again?
- How will automatic switches work to shut off power and then turn it back on again?
- Do lines need to be visually examined before turning the power back on? How is this accomplished? Can technology be used to expedite this process?

For the reasons and questions listed above, the City of Fremont Fire Department strongly urges the CPUC to work closely with local governments before finalizing R. 18-10-007.

Please contact me directly if I can be of any further assistance.

Sincerely,

Rick Cory
Division Chief, Operations
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