

Assigned Commissioner and Administrative Law Judge's Ruling Launching Phase 2 of the Wildfire Mitigation Plan Proceeding

1. Listed tasks the independent evaluator should undertake, issues it should address, and qualifications it should possess:

- Assemble a team of qualified engineers, linemen and others
- Establish a field inspection program for the inspection of facilities being constructed and in-service electric transmission and distribution lines, with a primary goal of identifying significant conditions that increase risks of wildfire ignitions
- Request necessary records from electrical corporation
- Identify safety issues and potential violations
- Perform analysis of information collected through field inspections and develop reports that summarize trends, patterns and other information that may be required by CPUC in order to assess overall compliance performance of electrical corporations
- Assess whether the electrical corporation failed to fund any activities included in its Plan

2. Solicited input on other suggested topics from parties



Party Comments on Ruling Launching Phase 2: Regarding Independent Evaluators (IE) (I/III)

PG&E	SCE	SDG&E	Bear Valley	PacifiCorp
• Recommends CPUC clearly delineate IE's role compared to roles of other entities • List of qualified IEs must be sufficiently robust to enable each utility the opportunity to select a qualified IE with experience in electric utility asset management & risk assessment • List of IEs should include experienced firms capable of facilitating evaluations or audits who can retain evaluators experienced in utility practices	• Recommends IE: a) have significant utility experience including both electrical & vegetation management; b) based outside of California to provide an independent view; c) be a firm instead of a specific individual, to reduce individual bias; d) meet & confer with utilities before the start of their field inspections • CPUC should allow utilities access to draft reports so utilities can correct any factual errors before the final report is published • CPUC should set up process to resolve any potential disagreements between utilities and IE before publishing final report • Detailed scope of work for the review and a standard template/checklist for IE review & reports should be developed	• Recommends CPUC first clearly define what the IE's role, function, & responsibilities will be • Recommends CPUC provide clarification on what the IE will be using as a baseline	• IEs tasks should conform with SB901 & focus on a utility's compliance with its WMP in order to minimize costs for customers & ensure the IE can complete its review & assessment by July 1	• Scope of IE's responsibilities should be limited to comparing the plan being implemented against the plan that was approved, identifying any gaps in the original plan, & recommending the timeframes in which modifications to the plan must be completed • IE should provide an objective assessment of plan delivery rather than subjective interpretation of a plan's effectiveness



Party Comments on Ruling Launching Phase 2: Regarding Independent Evaluators (IE) (II/III)

Cal Advocates	Protect Our Communities Foundation	Small Business Utility Advocate	Green Power Institute
• IE should be able to work with agencies & parties, share its findings as needed • The IE should have immediate access to utility equipment & assets • CPUC should provide IE preliminary guidelines containing the types of risk-based criteria used to determine utility compliance with its WMP • The IE team should include a certified arborist who is knowledgeable in vegetation management	• Concern that if the IE is hired directly by the IOUs, tasks 4b & 4c identified in the Scoping Memo will not be sufficiently independently carried out • Recommends CPUC designate the Public Advocates Office as the entity that will hire & oversee the IE to minimize any potential for conflicts of interest	• CPUC should develop a timeline for the tasks the IE will be responsible for • IE should also make recommendations on penalties CPUC should assess on utilities that fail to timely implement their WMP or meet other CPUC directives • IE should produce public reports on a periodic basis, at least once a year prior to the beginning of wildfire season so that safety issues are remedied in a timely manner • IE should evaluate utility-specific innovative programs with the goal of having the IE recommend whether other utilities should propose comparable programs in subsequent WMPs • IE should evaluate utilities' outreach efforts	• Tasks 2 & 3 in the proposed statement of work for the IE should be reversed: Before a field inspection program (task 2) can be efficiently designed, the IE needs to request & audit relevant records from utilities (task 3) • An effective field inspection program should be developed that spot checks the information contained in the records



Party Comments on Ruling Launching Phase 2: Regarding Independent Evaluators (IE) (III/III)

California Environmental Justice Alliance	Rural County Representatives of California	Joint Local Governments	William Abrams
• IE should evaluate outreach, customer protections & de-energization in addition to structural mitigation & hardening measures	• In addition to the team of qualified engineers & linemen the IE is to assemble, fire scientists should also be consulted & added to this team • When identifying safety issues & potential violations, the public should be concurrently notified • OSA should be relied upon & included in the IE team	• In addition to the tasks identified in the Phase 2 Ruling, the field inspection program should include input from local governments to ensure that the evaluator has information on local conditions & practical considerations impacting infrastructure work that may not be apparent to an outside observer	• In addition to the internal industry stakeholders (lineman, engineers, etc.), there needs to be external experts that can maintain independence & recommend substantive methodologies. • Enterprise Risk Management professionals & their expertise in risk mitigation needs to be leveraged in this proceeding • IE should facilitate the standardization of metrics across IOUs