City of Placerville

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November 27, 2018

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

Submitted via email: public.advisor@cpuc.ca.gov

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

Dear President Picker:

The City of Placerville appreciates the opportunity to comment on proceeding R. 18-10-007 regarding investor-owned utilities (IOUs) wildfire mitigation plans. As a customer of PG&E, we rely on them for all our electric service needs and expect PG&E to provide that energy safely. We appreciate the leadership of the California Public Utilities Commission in addressing the increasingly devastating and destructive wildfires California has faced in recent years and the role played by power facilities.

Local governments across California have long been at the forefront of wildfire and disaster preparedness and response. With the trends of increasing wildfire severity and extended fire seasons, strengthened safety and operating procedures for utility's is critical to better protect the community's served by PG&E.

The City of Placerville recognizes the need and supports the efforts of PG&E to increase the safety of their facilities. We believe the development of Wildfire Mitigation Plans and the implementation of these plans can provide a degree of safety in providing safe energy to our citizens. We also believe a robust pole line maintenance program, coupled with an aggressive tree trimming program will return safety and reliability to PG&E's system.

On October 14, 2018, PG&E shut off power to the City of Placerville and the surrounding area, due to high wind warnings. Although the concept and purpose of the shut off was understood, the communication and procedures in doing so were severely lacking. For example, no direct communication was made to the City of Placerville or El Dorado County Fire Protection District by PG&E. It was only through communication from local citizens that the City's leaders and emergency responders learned of the pending shut off.

The City is concerned that the October 14th safety outage occurred when wind speeds never met PG&E's published outage criteria in or around Placerville. The circuits de-energized from PG&E's Placerville Substation paralyzed numerous critical services and public safety buildings, many fed directly from underground facilities. Many portions of the City affected on October 14th are outside PG&E's designated Extreme Fire Hazard Zone including our historic downtown.

For this program to succeed PG&E must install additional sectionalizing equipment surrounding Placerville to reduce the outage area. The City of Placerville is the County Seat of El Dorado County. Beyond our own emergency services, the County Sheriff, CHP and El Dorado County Fire District operated critical facilities in Placerville affected October 14th. In addition, other important facilities include Marshall Hospital, El Dorado Irrigation District, County School District, numerous extended care homes, outpatient labs and mental health facilities.

In a foothill community, the role of a central city to provide services during an emergency cannot be understated. PG&E's October 14th outage created dozens of community emergencies that Placerville was called on to address **without electric service.**

Finally, Highway 50, a main East West Highway out of the Sacramento Valley runs through Placerville and includes three traffic signals that control all traffic flow thru Placerville. Because of the extended outage and lack of proper notifications or communication, a serious safety issue was created during PG&E's Safety Outage. Emergency response times for County Fire, Cal Fire, CHP, El Dorado Sheriff and Placerville Police increased from the normal of a few minutes to as much as over an hour during the 20 hour event.

As stated above, the City of Placerville supports the development of Wildfire Mitigation Plans including power safety outages during high wind events. However, if power outages continue to be an option in the Wildfire Mitigation Plans, strict guidelines must be implemented to avoid creating new, significant, safety issues that may arise during such an outage. Every effort should be made to reduce the tremendous financial loss associated with the current, inadequate plan.

We look forward to the continued discussion and welcome the opportunity to provide further input. Thank you for considering our comments. If you have any questions, please feel free to contact me at (530) 642-5200.

Sincerely,



M. Cleve Morris
City Manager