From: Clement Brown <cbrown@delmar.ca.us>
Sent: Tuesday, November 13, 2018 2:31 PM
To: Public.advisor <Public.advisor@cpuc.ca.gov>
Subject: City of Del Mar Input on Utilities' Wildfire Mitigation Plans (SB 901)

Dear California Public Utilities Commission (CPUC) staff,

Senate Bill 901 requires electric utilities to prepare and submit wildfire mitigation plans that describe the utilities' plans to prevent, combat, and respond to wildfires affecting their service territories. The CPUC is seeking input from local officials on what should be included in the wildfire mitigation plans before its November 14, 2018 prehearing conference in San Francisco. Unfortunately, as you know, equipment from utility companies has been known to start wildfires. In fact, Cal Fire determined PG&E equipment caused 17 major wildfires across Northern California in October 2017. The total costs of those fires could reach $17 billion. In terms of wildfires and public utilities, there are four areas the City of Del Mar recommends be included in the wildfire mitigation plans:

1) Build Relationships with the First Responder Community
First responders do not work in a vacuum. California uses a multi-agency, multi-discipline approach in mitigating wildfires. Relationships are built well before the fire starts. The public utility companies need to be true partners in that relationship. They should attend regional fire and law meetings and participate in training encompassing wildfire preparedness, communications, incident command system, electrical/gas safety and other relevant topics. Building these critical relationships takes dedication, time and effort. It should be done on a full time basis with people knowledgeable about regional emergency response. In addition, the public utility companies should also invest in equipping first responders with the best technologies and equipment to respond effectively to wildfires affecting their service territories.

2) Strong Vegetation Management Program
Removing fuel around electrical lines reduces the risk of fire. Utility companies need to invest in best practices to ensure that trees are inspected and trimmed annually near power lines and dead brush is cleared all around power lines.

3) Hardening of Infrastructure
The probability of a fire starting from a power line increases with wind speed. Additionally, the danger of a wildfire spreading dramatically increases with wind speed. This means that the conditions that cause power lines to start fires are the exact same conditions that make them spread rapidly and become hard to contain. Utility companies should invest in hardening their infrastructure to make it less susceptible to starting fires, especially during wind events. This includes:

- Replacing wooden poles with steel poles that can withstand greater wind speeds.
- Replacing narrow gauge wires with heavy gauge wires.
- Increase the spacing between wires to prevent line slap.

4) Invest in Predictive Weather Services and Early Warning Detection Equipment
Fire behavior is influenced by fuel, weather, and topography. Like the first responder community, the utility companies need to be on a higher alert during hot, dry, and/or windy conditions. Utility companies also need to know what the current and expected weather is in their various micro-climates. For example, SDG&E has 177 weather stations throughout their area that measure temperature, wind, humidity, etc. This information is helpful to assess fire ignitions and the possibility that large, damaging fires might occur.

Early warning detection devices such as cameras and other monitoring equipment should be installed across the utility network for early notification. The idea is to keep small fires in check so that they do not become major, destructive wildfires. I thank you for considering these recommendations.

Sincerely,

Scott Huth
City Manager
City of Del Mar

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