City of Rolling Hills

INCORPORATED JANUARY 24, 1957

NO. 2 PORTUGUESE BEND ROAD
ROLLING HILLS, CA 90274
(310) 377-1521
FAX (310) 377-7288

December 13, 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 Plan

Dear President Picker:

The City of Rolling Hills appreciates the opportunity to provide comments for the proceeding R. 18-10-007 regarding Investor-owned Utilities (IOUs) wildfire mitigation plans. With your leadership, the City of Rolling Hills is hopeful that the implementation of the plans will play a key role in supporting local efforts to prevent wildfires.

The City of Rolling Hills is a bedroom community in Los Angeles County located south of the Los Angeles World Airport and north of the Port of Los Angeles. The Department of Forestry and Fire Protection (Cal Fire) identified the city as being in the Very High Fire Hazard Severity Zone. The California Public Utilities Commission (CPUC) Fire Threat Map, January 2018 identified Rolling Hills being in the High Fire Threat District Tier 2. Unlike the nearby-urbanized cities of Torrance, Redondo Beach, Lomita, and Carson, Rolling Hills is rural in its setting comprising of steep canyons, and because of the hilly nature of the setting, overhead utilities in some areas are found to be at the same elevation as the street levels up above, presenting high risk of sparks/ignition if struck.

The electrical corporation Southern California Edison (SCE) serves the neighboring cities listed above and Rolling Hills. Combined it is a very small area of SCE's service territory, but even so the climate and physical setting can vary tremendously. In order for the IOUs wildfire mitigation plans to be effective, the plans need to recognize the varying settings of the electric corporation's service territory.

Respectfully, the elements listed in the amended Public Utilities Code Section 8386 need to require the electric corporations to provide their plans broken down explicitly by geographical areas or defined areas of similar settings or by cities within the service territory.

Additionally, the City of Rolling supports the League of California Cities' request that IOUs coordinate with local agencies in their service territory when developing wildfire mitigation plans. Amended PUC Code Section 8386(d) states the Commission shall accept comments on each plan from the public, other local and state agencies but there are no requirements to circulate plans to the public, local and/or state agencies.

Respectfully, the electric corporation shall be required to seek the input of local agencies prior to submitting plans to the commission for approval.

Also, the IOUs' above ground infrastructure has demonstrated to be severe risks in igniting wildfires. Amended PUC Code Section 8386(c)(3) requires a description of the preventive strategies and programs to be adopted by the electrical corporation to minimize the risk of its electrical lines and equipment causing catastrophic wildfires.

Respectfully, electrical corporations shall be explicitly required to include undergrounding utility lines as one of the preventive strategies.

Thank you very much for your consideration of the City of Rolling Hills' comments to the proceedings relating to IOUs wildfire mitigation plans. Please contact me at (310) 377-1521 or at ejeng@cityofrh.net if you have any questions.

Sincerely,

Elaine Jeng, P.E.
City Manager