LEAGUE® OF CALIFORNIA CITIES

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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 League of California Cities® appreciates the opportunity to comment on proceeding R. 18-10-007 regarding investor-owned utilities (IOUs) wildfire mitigation plans. Californians rely on energy for basic services and on energy providers to get it to us 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.

Local governments across California have long been at the forefront of wildfire and disaster preparedness and response. With the trends of increasing wildfire severity, strengthening safety, and other policies to protect against these disasters are critical.

The League requests that IOUs coordinate with local agencies in their service territory when developing wildfire mitigation plans.

New utility wildfire mitigation plans will have numerous direct effects on local governments, including receipt of notifications, recloser and deenergizing protocols, plans for restoring service, and vegetation management. Specifically, protocols for deenergizing utility lines have important effects on residents, businesses, and city operations. In response to power outages, cities respond by changing traffic signals, a labor-intensive transition that requires city staff time. Local governments are also likely to be affected by any changes in vegetation management procedures and would appreciate the opportunity to work with utilities on changes to such policies. Furthermore, cities and other local governments would like the opportunity to coordinate with utilities to ensure notice is provided to hospitals, businesses, and residents that rely on electrical service.

For these reasons, we request the Commission consider our request that utilities coordinate with local governments. Thank you for considering our comments. If you have any questions, please feel free to contact me at (916) 658-8250.

Sincerely,

Erin Evans-Fudem
Legislative Representative