Fire Safety PD: Fire Incident Data Collection Plan

- The consensus Workshop Report stated that the Fire Incident Data Collection Plan (Plan) requires the IOUs to "collect and report data to [the CPUC Safety and Enforcement Division (SED)] regarding power-line fires, and for [SED] to identify and assess systemic fire-safety risks associated with overhead power-line facilities and aerial communication facilities in close proximity to power lines." (*Phase 3 Joint Parties' Workshop Report, for Workshops Held January March 2013* [Workshop Report], at p.C-1.)
- The Plan itself in Appendix C, however, does not refer to overhead power lines and aerial communication facilities as stated in the Workshop Report. While the text of the decision does provide some guidance, the Plan will be a stand-alone document and could be misinterpreted later without the specific description from the consensus Workshop Report. The Plan should therefore be revised to include this language.
- The language in the PD is also not entirely consistent with the Workshop Report and should be revised.

Page 82 of PD:

- 7. Fire Incident Data Collection Plan
- 7.1. Summary of the Plan

In Phase 3, Track 2 of this proceeding, the parties jointly developed a plan for the IOUs to collect and report data to SED regarding power-line fires, and for SED to use this data to (1) identify and assess systemic fire-safety risks associated with overhead power-line facilities <u>and</u> <u>aerial communication facilities in close proximity to power lines</u>, and (2) formulate measures to reduce the number of fires <u>ignited by power lines</u> <u>associated with overhead utility facilities</u>. The Track 2 participants included SED, the IOUs, communications companies, cable providers, fire agencies, consumer groups, and a private intervener. The product of their joint effort is the Fire Incident Data Collection Plan hereafter, Fire Data Plan or Plan) that is attached to the Phase 3 Workshop Report as Appendix C.

Ordering Paragraph 7 on Page 102 of PD:

7. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall start the collection of fire-incident data <u>associated with</u> <u>overhead power-line facilities and aerial communication facilities in close proximity to power</u> <u>lines</u> in accordance with the Fire Incident Data Collection Plan that is approved by this decision no later than 120 days from the date this decision is issued.

Appendix C, Page C-1 of PD:

Fire Incident Data Collection Plan

This plan requires Investor Owned Utilities (IOUs) to collect and report data to the Safety and Enforcement Division (SED) regarding power-line fires, and SED to identify and assess systemic fire-safety risks associated with overhead power-line facilities and aerial communication facilities in close proximity to power lines. The plan contains a data template to be used by the IOUs to record and submit data to SED, as well as a set of principles governing the collection and submission of data. The plan also sets forth how SED would analyze the data and formulate cost-effective measures to reduce systemic utility-related fire risks.

SED details the data that electric utilities shall submit to the California Public Utilities-Commission. SED's Revised Data Collection Proposal <u>The Plan</u> is designed to provide information....

Appendix C, Page C-3 of PD:

4. Fire-related reporting requirements should be limited to events that meet the following criteria.[FN]

For the purposes of the <u>Fire Incident</u> Data Collection <u>Proposal Plan</u>, a reportable event is any event where <u>utility facilities</u> <u>overhead power-line facilities or aerial communication facilities in</u> <u>close proximity to overhead power lines</u> are associated with the following conditions:

(a) A self-propagating fire of material other than electrical and/or communication facilities, and

(b) The resulting fire traveled greater than one linear meter from the ignition point, and

(c) The utility has knowledge that the fire occurred.