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June 9, 2014

Denise Tyrrell  
Acting Director  
Safety and Enforcement Division  
California Public Utilities Commission  
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San Francisco, CA 94102  
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Fadi Daye  
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Dear Denise Tyrrell and Fadi Daye:

**Re: Draft Resolution ESRB-4 (Draft Resolution)**

Pacific Gas and Electric Company (PG&E) respectfully submits these comments on the Draft Resolution, issued on May 30, 2014, directing investor owned utilities to take remedial measures to reduce the likelihood of fires associated with or threatening utility facilities during the current drought.

PG&E strongly supports the California Public Utilities Commission (Commission) for its efforts to reduce the fire threat conditions associated with the statewide drought and agrees with the necessity of reducing the typical 30-day comment period on the draft resolution. The Commission's urgency in addressing this important issue is illustrated by the ongoing statewide drought conditions as noted in the State's most recent weekly drought update which is attached.

PG&E requests that the Commission approve the Draft Resolution at its June 12, 2014 meeting.

Sincerely,

A handwritten signature in cursive script that reads 'Brian Cherry / sw'.

Vice President, Regulatory Relations

Attachment

cc: Service List R.08-11-005



**Cal OES**  
GOVERNOR'S OFFICE  
OF EMERGENCY SERVICES



## Weekly Drought Brief Friday, June 6, 2014

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### CURRENT CONDITIONS

**Fire Activity:** CAL FIRE has responded to 2,053 wildfires across the state since January 1, burning 16,910 acres. This year's fire activity is well above the year-to-date average of 1,217 wildfires on 10,232 acres. Cal FIRE has responded to over 200 new wildfires over the past week, including the nearly 500-acre "59 Fire" near Don Pedro Reservoir. While drought conditions have increased wildfires, additional firefighters, fire engines and firefighting aircraft staffed earlier than normal have allowed CAL FIRE to contain these wildfires quickly in most cases.

**Snow survey:** The final manual snowpack survey of the season conducted on May 1 showed California snowpack at 18% of normal. A more recent update using automated devices shows snowpack at 0% of normal as of June 3.

**Reservoir Levels (% capacity):** Reservoir Levels as of June 5 remain low, including: Don Pedro 53%; Exchequer 30%; Folsom Lake 55%; Lake Oroville 48%; Millerton Lake 62%; New Melones 33%; Pine Flat 43%; San Luis 40%; Shasta 47%; and Trinity Lake 48%. An update of water levels at other smaller reservoirs is also available.

**Vulnerable Water Systems:** The California Department of Public Health is providing technical and funding assistance to help several communities facing near-term drinking water shortages and is monitoring water systems across the state to determine where else it can provide support. Updated information can be found at the CDPH Drinking Water Program website.

**Recent and coming precipitation:** No significant rain fell over the last week and no rain is expected in next week. During these dry months almost no rain falls in California so any precipitation that does fall will be noted in this weekly report, with information on the location and amount of the rain.

**Most recent El Niño predictions suggest possibility of dry winter:** Amidst a third straight year of drought, climatologists recently gained attention for indicating the possibility of an El Niño weather phenomenon this coming winter, in which ocean waters warm and wet winters often result. The most recent update on El Niño projections from the National Oceanic and Atmospheric Administration (NOAA) suggest that an El Niño phenomenon is likely to develop at only a "moderate" level, which only half the time results in a wetter than normal winter. This update in climate projections indicates the need to continue to plan for the clear possibility of continued drought into 2015.

### KEY ACTION ITEMS FROM THIS WEEK

- **Emergency water curtailments:** Last week, the State Water Board issued curtailments to junior water rights holders in the Sacramento and San Joaquin River watersheds, and a specific stretch of the Russian River, to protect senior water right holders. On Tuesday of this week (June 4), the Water Board's emergency regulations setting minimum fish flows on three tributaries of the Sacramento River went into effect. Two of the tributaries affected by the regulations (Antelope and Mill) have approved voluntary agreements, negating the need for curtailments. Curtailment notices for the third tributary, Deer Creek, have been issued. Additional curtailments are planned for the week of June 23rd. On June 17, the State Water

Board will consider a proposed emergency rulemaking to address water curtailments to protect senior water right holders. Updated information on water curtailments can be found on the Water Board's [curtailment webpage](#).

- **Recycled water regulations streamlined:** The State Water Board also this week [adopted a general order](#) that makes it easier for communities to use recycled water for agriculture, landscape, golf course irrigation, and other uses.
- **Water conservation efforts being assessed:** The State Water Board is surveying urban water agencies throughout the state to track their water conservation actions. The Governor's recent [Proclamation of Continued Emergency Drought](#) called on residents to limit outdoor irrigation and prevent wasteful water practices. The Water Board will be hold a workshop on June 17 to assess current conservation efforts and will assess whether emergency regulations are necessary to ensure effective water conservation in the coming months.
- **Emergency food aid:** The California Department of Social Services has provided over 55,000 boxes of food to date for counties impacted by the drought. This food aid, enabled by emergency drought legislation passed in March, is targeted toward residents economically impacted by the drought. The Department is working with local food banks to ensure that each food bank has a plan to outreach to those most impacted by the drought.
- **Housing and rental assistance to drought impacted residents:** The California Department of Housing and Community Development [has selected](#) the non-profit group La Cooperativa to distribute \$10 million in housing and rental assistance for drought impacted Californians. Thousands of low-income California families who are impacted by the drought are eligible for this short-term rental assistance, which will available in the coming weeks.
- **Water agencies receive efficiency grants:** The U.S. Bureau of Reclamation announced this week that [8 California water agencies will receive \\$6.3 million](#) to enable specific water reliability projects that help communities build resilience to drought. The Bureau of Reclamation also announced that 6 projects across California will receive a total of \$1.8 million in CALFED Water Use Efficiency grants. These 14 grants, when combined with local cost-share contributions, result in more than \$43 million in water management improvement projects that will be implemented in the coming months.
- **Utility Bill Assistance Announced:** The California Department of Community Services and Development on Wednesday [announced an emergency funding program](#) to assist drought impacted, low-income households in paying their residential water utility bills to prevent disruption in vital water services. The \$600,000 program will be directed to families in 10 counties currently experiencing among the worst drought impacts.
- **Dust Control Strategy Advanced:** The California Department of Food and Agriculture [has identified strategies and actions](#) that can help farmers control dust during the drought. Several hundred thousand acres of fallowed lands increase the threat of major dust storms in parts of California, so the state is working provide landowners ways to reduce airborne dust on their properties.
- **Drought Taskforce Leaders meet in Yreka:** Leaders of the Governor's Drought Taskforce will meet with local officials in Yreka (Siskiyou County) next Friday, June 13. This meeting will enable state and local officials to coordinate response to local drought impacts. It is the fifth

regional meeting of the Governor's Drought Taskforce, with previous meetings held in Ukiah, Merced, Santa Cruz, and Visalia.

- **Cost Data:** Cal OES continues to gather drought-related costs from state agencies and local governments, which is reported weekly to the Drought Taskforce.
- **Governor's Drought Task Force:** The Taskforce continues to meet daily to take actions that conserve water and coordinate state response to the drought.

### **Local Government**

- **Local Emergency Proclamations:** A total of 46 local Emergency Proclamations have been received to date from city, county, and tribal governments, as well as special districts:
  - **Counties:** Glenn, Inyo, Kern, Kings, Lake, Madera, Mendocino, Merced, Modoc, Santa Barbara, San Luis Obispo, San Joaquin, Siskiyou, Sonoma, Shasta, Sutter, Tulare, Tuolumne, Yuba, and Mariposa.
  - **Cities:** Brooktrails Township-Mendocino County, City of Willits-Mendocino County, City of St. Helena-Napa County, City of Calistoga-Napa County, City of American Canyon-Napa County, City of Santa Barbara-Santa Barbara County, City of Montague-Siskiyou County, City of Live Oak-Sutter County, and San Juan Bautista
  - **Tribes:** Hoopa Valley Tribe in Humboldt County, Yurok Tribe in Del Norte County, Tule River Indian Tribe in Tulare County, Karuk Tribe in Siskiyou/Humboldt Counties, Sherwood Valley Pomo Indian Tribe, Yocha Dehe Wintun Nation
  - **Special Districts:** Lake Don Pedro Community Services District, Placer County Water Agency (PCWA), Twain Harte Community Services District, Carpinteria Valley Water District, Sonoma County Water Agency, Meiners Oaks Water District, Mariposa Public Utility District, Montecito Water District, Goleta Water District, Tuolumne Utilities District, Nevada Irrigation District
- **Water Agency Conservation Efforts:** The Association of California Water Agencies has identified several hundred local water agencies that have implemented water conservation actions. These water agencies are responding to the drought by implementing conservation programs, which include voluntary calls for reduced water usage and mandatory restrictions where water shortages are worst.
- **County Drought Taskforces:** A total of 26 counties have established drought task forces to coordinate local drought response. These counties include: Butte, Kern, Kings, Lake, Madera, Mendocino, Merced, Modoc, Monterey, Nevada, Orange, Placer, Plumas, Sacramento, San Joaquin, San Luis Obispo, San Mateo, Santa Barbara, Siskiyou, Stanislaus, Sutter, Tehama, Tulare, Tuolumne, Yolo, and Napa. The Hoopa Tribe has also established a drought task force.

## DROUGHT RELATED WEBSITES FOR MORE INFORMATION

### Drought.CA.Gov: California's Drought Information Clearinghouse

State's Water Conservation Campaign, [Save our Water](#)  
Local Government [Drought Clearinghouse and Toolkit](#)

California Department of Food and Agriculture, [Drought information](#)  
California Department of Water Resources [Current Water Conditions](#)  
California Data Exchange Center, [Snow Pack/Water Levels](#)  
California State Water Resources Control Board, [Water Rights](#), [Drought Info and Actions](#)  
California Natural Resources Agency, [Drought Info and Actions](#)  
California Department of Public Health, Drinking Water [CDPH Drinking Water Program](#)  
California State Water Project, [Information](#)

[U.S. Drought Monitor](#) for current conditions throughout the region  
[U.S. Drought Portal](#), National Integrated Drought Information System (NIDIS)  
National Weather Service [Climate Predictor Center](#)  
USDA Drought Designations by County [CA County Designations](#)  
USDA Disaster and Drought Assistance Information [USDA Programs](#)  
Small Business Administration Disaster Support: [www.sba.gov/disaster](http://www.sba.gov/disaster)