

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2014 (U39M).	Application 12-11-009 (Filed November 15, 2012)
And Related Matter.	Investigation 13-03-007

**COMMENTS OF ORLEANS/SOMES BAR FIRE SAFE COUNCIL
ON PROPOSED DECISION
AUTHORIZING PACIFIC GAS AND ELECTRIC COMPANY'S
GENERAL RATE CASE REVENUE REQUIREMENT FOR 2014-
2016**

Nancy Bailey
Orleans/Somes Bar Fire Safe Council
P.O. Box 409
Orleans, CA 95556
Phone: 530-627-3202
Email: nancy@mkwc.org

Dated: July 7, 2014

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2014 (U39M).	Application 12-11-009 (Filed November 15, 2012)
And Related Matter.	Investigation 13-03-007

**COMMENTS OF ORLEANS/SOMES BAR FIRE SAFE COUNCIL
ON PROPOSED DECISION
AUTHORIZING PACIFIC GAS AND ELECTRIC COMPANY’S
GENERAL RATE CASE REVENUE REQUIREMENT FOR 2014-
2016**

I. INTRODUCTION

Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, Orleans/Somes Bar Fire Safe Council (“OSBFSC”) provides opening comments on the proposed decision issued by ALJ Thomas Pulsifer on June 18, 2014.

OSBFSC’s comments specifically address Section 4.8 of the proposed decision, Vegetation Management.

II. DISCUSSION

OSBFSC is located in Orleans, California, a densely-forested area of far northern California. It was established to “help plan, implement and monitor the

reinstatement of historic fire regimes primarily through the use of strategic fuel reduction in a manner that protects life and property, and improves forest health” (OSBFSC mission statement, 2001). OSBFSC is a member of the Fire Safe Councils of Siskiyou and Humboldt County that, in turn, are members of the California Fire Safe Council which incorporates and works with fire safe councils throughout the state from Siskiyou to San Diego Counties. For more than a decade OSBFSC has been funded by Federal, State, and County agencies to do fuels reduction, shaded fuelbreak construction, and controlled burns on private land in Humboldt and Siskiyou Counties. In 2014, the Orleans community was nationally recognized by the Firewise Communities program, as one in five communities nationwide, to receive a Grand Prize from the National Fire Protection Association. This award honors the history of OSBFSC in creating defensible space, educating residents around fire-safety, and participating in collaborative land management planning in relation to wildfire risk management and the use of prescribed fire to meet multiple objectives.

Through its extensive experience with private landowners, OSBFSC has seen numerous fire-risk problems within PG&E’s power line easements related to vegetation management. Over the years, since 2009, several letters have been written to PG&E vegetation managers (See exhibit #205) describing specific situations that represent extreme fire hazards to these rural communities. Some of these situations have been results of fuels reduction prescriptions not being followed or carried out to completion. Others were related to the prescriptions themselves, which in certain high-risk areas, do not appear adequate for protection of homes, property, and the public. An example of this is the requirement to lop and scatter up to a depth of 18”, a depth which, in this country, allows brush to grow through, creating an impenetrable fuel bed within the easement. While PG&E and their contractors have been responsive when confronted with instances of prescriptions not being followed or work not completed, they have indicated that their hands are tied when asked for work over and above what their mandate is within their vegetation management policy.

While we applaud the proposed new Fire Risk Reduction program, which will reflect a more rigorous assessment in the highest risk areas and possible removal of trees that can potentially fall onto power lines, (see exhibit #55), this is only a piece of the puzzle. When easements themselves have become fuel beds, the fire risk is present whether ignition results from a tree falling on the lines or by any other ignition source. When fuel loaded easements lead through neighborhoods and directly to rate payers' homes, they represent an extreme danger, no matter how a fire was started.

Through communications with sister Fire Safe Councils in Northern California, OSBFSC understands that the fire-risk hazards associated with power easements is indeed a regional problem, not simply a local one. Specifically, the Mendocino Fire Safe Council and the Van Duzen Watershed Fire Safe Council have both reported similar situations in their respective areas, and have requested inclusion in these comments.

OSBFSC, and other local Fire Safe Councils, are in a unique position to assist PG&E with these problems. As informed stakeholders, with localized knowledge regarding fire behavior and fire risk prioritization, the involvement of these groups could be key in reducing fire risk more effectively than is practiced by outside contractors. OSBFSC has presented several constructive ideas for ways that local groups could contribute to fire risk reduction (see Opening Brief Of The Division Of Ratepayer Advocates, pp. 141-142 and Exhibit 205, email dated June 20th, 2013). These suggestions have had no response from PG&E.

As a local leader in fire preparedness and fire management planning, OSBFSC works collaboratively with the US Forest Service, Humboldt and Siskiyou Counties, the Orleans Volunteer Fire Department, the Karuk Tribe, and other local stakeholders to strategize fire response and fire resiliency based on the fact that fire in this bioregion is here to stay. As a part of this planning process and for use in the continually updated local Community Wildfire Protection Plan, OSBFSC has repeatedly requested that PG&E share a GIS map layer of the their power easements to help with gathering information for use in these strategic mapping efforts. Citing security reasons, PG&E has not seen fit to share this

information. We regularly focus project work along power lines because transformers in our area have failed, causing fires in the past. Prioritization of our projects would benefit from this information and would help protect PG&E infrastructure.

III. CONCLUSION

Fire safety is paramount for California residents living in densely-forested areas of the state, particularly as California's historic drought continues to deepen.

PG&E has an opportunity to develop relationships with OSBFSC and other local Fire Safe Councils in ways that will benefit all involved. True fire risk reduction must take place in the context of local knowledge and expertise.

The CPUC should direct PG&E to use a portion of its ratepayer funding for vegetation management to work with local groups and consult those groups formally on fire reduction efforts. These groups should also be given the opportunity to work directly with PG&E's vegetation management contractors and supervisors. The benefits provided by more active involvement between the utility and local groups would be quantifiable to all stakeholders.. By sharing important information for planning efforts, altering prescriptions in strategic areas, and hiring local fire safe crews to do extra clean-up, PG&E would be taking a necessary step toward fire risk reduction and public safety.

For all the foregoing reasons, OSBFSC asks that the Commission adopt its recommendations.

Respectfully signed and submitted on July 7, 2014.

ORLEANS/SOMES BAR FIRE SAFE COUNCIL

/s/ Nancy Bailey

Nancy Bailey
Orleans/Somes Bar Fire Safe Council
P.O. Box 409.
Orleans, CA 95556
Phone: 530-627-3202
Email: nancy@mkwc.org