

August 26, 2020

Wildfire Safety Division
California Public Utilities Commission
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Re: Comments of the California Association of Small and Multi-Jurisdictional Utilities on 2021 Wildfire Mitigation Plan Guidelines and Metrics, GIS Data Reporting Standards, and Safety Culture Assessments

Bear Valley Electric Service, Inc. (“BVES”), Liberty Utilities (CalPeco Electric) LLC (“Liberty CalPeco”), and PacifiCorp, d.b.a. Pacific Power (“PacifiCorp”) (collectively, the California Association of Small and Multi-Jurisdictional Utilities (“CASMU”)), provide the following comments on various proposals provided by the Wildfire Safety Division (“WSD”) during the August 11-12, 2020 workshops on guidance for the 2021 Wildfire Mitigation Plans (“WMPs”). Specifically, CASMU provides the following comments on proposals and recommendations for 2021 Wildfire Mitigation Plan Guidelines and Metrics, GIS Data Reporting Standards, and Safety Culture Assessment processes discussed during the August 11-12, 2020 workshops.

I. Introduction

Although the CASMU members are electric utilities, they differ significantly from California’s largest investor-owned utilities, Pacific Gas and Electric Company, Southern California Edison Company (“SCE”), and San Diego Gas & Electric Company (collectively, the “Large IOUs”). The CASMU utilities are significantly smaller than the Large IOUs. Each CASMU member has less than 50,000 customers, and disproportionate administrative costs are a more significant burden for a smaller number of customers. Accordingly, these comments focus on how the costs associated with additional reporting burdens will be disproportionately borne by CASMU members’ customers, because there are fewer customers to share those costs. The CASMU members understand that some additional burdens are warranted but stress that the burdens on utility resources and the associated costs should be weighed against the benefits in providing certain information in certain formats.

II. Comments on WMP Guidelines and Metrics

A. CASMU Supports Efforts to Simplify and Streamline Reporting Templates

As outlined in the *Wildfire Safety Division Staff Proposal on Changes to Wildfire Mitigation Plan Requirements and Metrics Tables* (“WMP Staff Proposal”), one of the objectives for revising the WMP guidelines is to standardize data across utilities in order to

provide more “[s]treamlined reporting and improve cross-utility comparisons.”¹ In general, CASMU appreciates and supports changes to templates and requirements in an effort to standardize and eliminate redundant requirements. These streamlining efforts will simplify the reporting process and allow utilities to spend more time developing and implementing wildfire mitigation plans. In particular, CASMU supports Recommended Changes 2i, 2j, 2k, 8a, 9a, 10a, 11b, 15a, 18a, S7a, and S7b in the WMP Staff Proposal, and CASMU looks forward to continued collaboration between the WSD and utilities that results in further optimization and streamlining of the template.

B. Development of a System Hardening for Electric Utility Resiliency (“SHEUR”) Threshold May Not Adequately or Appropriately Address Risk for All Utilities

CASMU is concerned that at this time, there is no demonstrable need for an entirely new risk methodology. While the development of a new SHEUR threshold is intended to set “an acceptable level of electric operation risk and [establish] the risk reduction that a utility should assume so that it can design its system accordingly,”² CASMU fears that the new threshold may not properly address risks or account for unique utility considerations. CASMU believes that existing utility risk management practices, which account for a variety of risks but broadly consider the risks of wildfire and the risks of outages, provide the needed flexibility to safely and reliably provide electricity to customers.

For example, PacifiCorp’s Remedial Compliance Plan includes a risk mitigation approach which adds levels of granularity to its risk modeling to assist in targeting higher risk facilities within otherwise generalized tiers. Under this approach, PacifiCorp outlines a path to section and segment analysis for each of its assets to inform risks, prioritize mitigation, and initially produce a generalized risk-spend efficiency measure. This process ensures that PacifiCorp can best address its system while most effectively mitigating against wildfires. The SHEUR threshold, on the other hand, may limit additional assessment of granular risk, which may result in a less optimal risk analysis.

Liberty CalPeco is currently developing its risk-based decision-making model that will utilize the results of a fire propagation study, conducted by Reax Engineering, to aid in prioritizing mitigations depending on risk profiles. Similar to PacifiCorp, Liberty CalPeco will analyze asset risk and risk-spend efficiency measures at the circuit level and by wildfire risk profile.

For these reasons, CASMU believes it is premature to introduce the SHEUR threshold. Instead, utilities should be provided the flexibility to incorporate more granular risk analyses to best assess risks in their service territories. If, however, the SHEUR threshold is implemented, CASMU recommends that it first be implemented for the Large IOUs before being applied to the

¹ WMP Staff Proposal, p. 4.

² See Wildfire Safety Advisory Board Recommendations for Developing the SHEUR Threshold presentation, p. 4, available at https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/WSAB%20Recommendations%20for%20Developing%20the%20SHEUR%20Threshold.pdf.

CASMU members. This will allow additional refinement and stakeholder feedback to optimize and enhance the SHEUR threshold for the CASMU members to utilize. Such a staggered approach is frequently utilized by the Commission. For example, the RAMP/S-MAP proceedings applicable solely to the Large IOUs are utilized to inform and create a framework for the CASMU members' risk-based decision-making programs. Additionally, to the extent the Commission intends to implement the SHEUR threshold, CASMU recommends that such risk aspects are a more appropriate topic for the Commission's risk-based decision-making proceeding, R.20-07-013.

C. CASMU Supports Efforts to Prioritize Data Provision in the WMP, Rather than Supplemental Data Requests

CASMU supports efforts to eliminate supplemental data requests by providing all required data in utility WMPs. Prior supplemental data requests have proven extremely burdensome and time consuming. By structuring the WMPs to provide all needed information, thereby avoiding supplemental data requests, utilities will avoid addressing burdensome data requests and can instead focus on implementation of wildfire mitigation measures. CASMU believes this approach will maximize safety. In this regard, CASMU supports Recommended Changes 2a and 3b of the WMP Staff Proposal.

D. Standardized or Template References Must Recognize that a Safety Culture Assessment Will Not be Conducted for All Utilities

The Safety Culture Assessment is a component of the Safety Certificate process under Public Utilities Code Section 8389. However, utilities are not required to obtain a Safety Certificate, and accordingly, will not have a Safety Culture Assessment. At this time, Liberty CalPeco and PacifiCorp have not obtained a Safety Certificate. To avoid confusion, as well as to avoid supplemental data requests regarding the appearance of "missing" Safety Culture Assessment or Safety Certificate information, standardized templates and references should make clear that Safety Certificate and Safety Culture Assessment information may not be applicable or available.

E. The WSD Should Provide Additional Guidance on Research Citations

CASMU appreciates concerns expressed regarding the need for additional citations to referenced research, and state and federal rules, requirements and proceedings. To ensure that utilities properly provide citations and references and to avoid inconsistency between utilities and WMPs, WSD templates should provide citation templates or standardized formats for utilities to follow in their WMPs.

III. Comments on GIS Data Reporting Standards

A. Utilities Should Report Risk Events and Initiatives Annually, Rather than Quarterly

The GIS Data Proposal outlines that the WSD expects “data covering risk events and initiatives ... to be submitted on a quarterly basis.”³ CASMU is concerned that quarterly reporting could prove overly burdensome, particularly on smaller, more resource-constrained utilities like the CASMU members. As acknowledged in the GIS Data Proposal, “the WSD fully expects to push the upper boundaries of current data collection and reporting efforts.”⁴ CASMU is concerned about how extensive the proposed data collection and reporting efforts are, as recognized by the WSD. In addition to drafting WMPs and implementing WMP mitigation measures, utilities are also subject to ongoing discovery requests, which can be duplicative of existing reporting efforts. Spending time addressing duplicative and burdensome requirements will detract utilities, and particularly the smaller staff of the CASMU utilities, from focusing on actual wildfire mitigation and implementation of WMP programs and requirements.

Furthermore, quarterly reports may not be beneficial and may not accurately reflect a utility’s progress on programs or initiatives. This is particularly true for the CASMU utilities that, given their unique characteristics, have seasonal limitations on construction in much or all of their service territories given the amounts of ice, snowfall, and harsh weather experienced. While many programs or initiatives are planned and completed on an annual basis, seasonal restrictions on construction windows dictate that the bulk of the work often be completed in a matter of months. Therefore, quarterly reports may not reflect anticipated progress depending on when a utility can commence construction. In particular, quarterly updates in December are likely to prove even less valuable given that WMPs will be submitted two months later in February and include end-of-year progress on any projects or initiatives. Accordingly, quarterly reporting is unlikely to provide valuable information, and may, in fact, suggest that a utility is behind schedule without proper consideration of seasonal construction windows.

Therefore, to help minimize some of the reporting burdens and ensure the limited staff of the CASMU utilities can focus on pressing fire mitigation matters, CASMU recommends that reports on risk events and initiatives be submitted annually rather than quarterly.

B. General Concerns Regarding Data Schema

It should be noted that for the data schema proposed in the *Draft Wildfire Safety Division Geographic Information System Data Reporting Requirements and Schema for California Electrical Corporations* (“GIS Data Proposal”), much of the data WSD proposes to collect is unknown by utilities. Therefore, when reporting this data, utilities may only be able to complete reports by entering “Unknown.”

Additionally, it appears there is an assumption that the data structure utilizes feature classes from Esri GIS software. This approach does not account for updates and developments

³ GIS Data Proposal, p. 5.

⁴ GIS Data Proposal, p. 5.

that will take place to this data structure going forward, making year-to-year or quarter-to-quarter comparisons difficult given that different data may be used at different times. Instead, a more established data structure may be appropriate to avoid the challenges associated with utilizing different data from Esri GIS software at different times.

Finally, CASMU recommends moving away from a connectivity-based system which, due to the system fluidity results, will create version control challenges.

C. Other Factors Besides Asset Age are More Indicative of Risk

The GIS Data Proposal requires utilities to provide data on asset age. A major consideration for any asset data is the proper characterization of its age. Circuits and line elements often comprise a wide range of ages, such that the first vintage of the conductor happened at a certain (general) time, followed by additional line elements (e.g., service transformers and their associated connectors). Over the years poles and or crossarms may have been replaced. As outages occur, such as could occur with a tree damaging one of more phases, splices and replacement conductors could be installed. Each of these are of varying vintages and typically are not known (or cannot even reasonably be inferred). CASMU members will, of course, provide the requested data to the extent they can. The significance of such data can be more fully discussed at a later time, but a few cautionary comments should be considered at this juncture.

First, there are some practical constraints. CASMU is concerned that it will be unnecessarily burdensome to ascertain and report asset ages as requested by the GIS Data Proposal. While utilities have records of their assets, obtaining and reporting asset ages in the requested format will require significant time and effort. For certain asset types, this can be much more difficult than other asset types. As described below, it is unclear that this information is essential for reporting, because there are other, more indicative factors of risk. Thus, CASMU suggests that asset age data requests at least be limited to more readily assembled data sets of primary asset types (e.g., poles).

Second, even assuming that asset age data could be assembled and shared easily, CASMU cautions that such data should be weighed appropriately. While age is one metric that can help determine the expected life of utility assets, other factors and metrics can more accurately assess risks based on asset deterioration. Importantly, the age of an asset is not necessarily indicative of its condition. Other factors such as location, environment, loading history, and similar related factors can more accurately assess the health and longevity of an asset.

Accordingly, CASMU cautions the WSD from placing too much stock in an asset's age when reviewing data provided by utilities. Over-reliance on an asset's age could misrepresent risk and impede prudent decision making and risk management. Instead, utilities and the WSD should be working towards better informed risk modeling tools. A more appropriate risk modeling approach is likely to consider a variety of metrics and factors besides age, such as overall asset health. PacifiCorp is currently developing a system to classify asset health. Liberty CalPeco's risk modeling approach considers the overall asset risk of its overhead facilities.

Liberty CalPeco is currently conducting a survey of its overhead assets to gather pertinent asset risk-related data that operations will use to assess the current condition of the system to develop an asset risk profile at the circuit level. Furthermore, Liberty CalPeco's outage management system reporting tool, Responder, also tracks historical incidents related to failures of overhead assets. Examining a history of its assets' failures considers more factors than solely age, as indicated above.

IV. BVES Comments on Draft Recommendations for Developing a Safety Culture Assessment Process

As outlined above, utilities are not required to obtain a Safety Certificate, and accordingly, will not have a Safety Culture Assessment. At this time, Liberty CalPeco and PacifiCorp have not obtained a Safety Certificate. While Liberty CalPeco and PacifiCorp do not have specific comments at this time, BVES provides the following comments on the *Wildfire Safety Division Draft Recommendations for Developing a Safety Culture Assessment Process* ("Safety Culture Recommendations").

A. The WSD Should Recognize that Chief Safety Officers May Have Other Duties and Responsibilities

The Safety Culture Recommendations propose "that the [Chief Safety Officer] CSO should be the utility executive who holds overall accountability for the annual Wildfire Mitigation Plan."⁵ BVES appreciates the value and importance of the Chief Safety Officer. However, given BVES' small staff, small customer base, and disproportionately larger impacts to customers of any expenses it incurs, BVES plans to utilize its Chief Safety Officer for additional roles. In addition to the public and workplace safety roles as the Chief Safety Officer, BVES' Chief Safety Officer also has other duties and responsibilities for BVES. BVES requests that the WSD recognize this organizational structure which is intended to provide the most cost-effective benefits for BVES' customers without compromising safety.

B. Comments on Performance Metrics

1. The WSD Should Adopt Standardized Definitions for Performance Metrics

The Safety Culture Recommendations describe "some of the wildfire safety metrics already being collected that could be used for WSD's [Safety Culture A]ssessment," including "Wires Down incidents," "Near Misses," and "Faults."⁶ Given the wide variance in the definition and severity of "Wires Down incidents," "Near Misses," and "Faults," BVES requests that the WSD consider working with the utilities to provide specific definitions for these metrics.

⁵ Safety Culture Recommendations, p. 8.

⁶ Safety Culture Recommendations, p. 11.

2. The WSD Should Clarify How Customer Outages are Utilized to Assess Safety Culture

The Safety Culture Recommendations include “Customer Outages from Public Safety Power Shutoff events (duration and extent)” as one of the outcome metrics to “measure how well the utility is driving down the aggregate risk from wildfires and Public Safety Power Shutoffs [‘PSPS’], and to reduce or eliminate risks of deaths and serious injuries to employees, contractors and the public.”⁷ BVES seeks clarification from the WSD as to how this metric will be used to assess how well a utility is mitigating risks, given that utilities only implement PSPS as a measure of last resort to ensure the public’s safety.

3. Additional Metrics

BVES recommends that the WSD consider adding “vegetation contact with bare high voltage conductor” to the list of outcome metrics on page 11 of the Safety Culture Recommendations.

C. Comments on Safety Culture Surveys

1. The WSD Should Consider Conducting Additional Safety Culture Surveys

The Safety Culture Recommendations describe how “[e]mployee surveys are a frequently used tool for assessing whether and how corporate policies are being viewed and acted upon throughout the organization.”⁸ BVES agrees that employee surveys are vital for assessing safety culture. However, given the paramount goal of public safety, BVES recommends that the WSD consider conducting surveys with local governments, agencies, first responders, and the general public within the utility’s service territory to further assess the safety culture of a utility.

2. Employee Surveys Should Include Additional Questions

BVES recommends that employee surveys include questions that assess employee awareness of the impact their work product has on public safety, including mitigating against wildfires.

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⁷ Safety Culture Recommendations, p. 11.

⁸ Safety Culture Recommendation, p. 10.

V. Conclusion

CASMU appreciates this opportunity to provide comments on proposals and recommendations for 2021 Wildfire Mitigation Plan Guidelines and Metrics, GIS Data Reporting Standards, and Safety Culture Assessment processes discussed during the August 11-12, 2020 workshops. The CASMU members look forward to working with the WSD and stakeholders to continue to improve and enhance public safety and reduce risks of wildfires.

Respectfully Submitted,



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Service List for R.18-10-007