

Comments Received During April 15, 2020 Wildfire Safety Advisory Board Meeting

Comment entered into the WebEx Chat Box & read out loud during the meeting.

From: Public Advocates Office, Henry Burton

The Public Advocates Office appreciates the WSAB's recommendations regarding IOUs' 2020 WMP, several of which are similar to ideas that the Public Advocates Office addressed in our comments on the WMPs. However, has the Board given consideration to how to separate the scope of Wildfire Mitigation Plans from other commission proceedings (especially the de-energization rulemaking)? Several of the Board's recommendations relate to de-energization and there is potential for interaction with the de-energization rulemaking. There could be duplication or conflicts if, for example, standards for re-energization are being developed separately (by the WSAB and SED) in different proceedings. The Board's recommendation on re-energization did not reference the revised guidelines that are being developed by SED / Energy Division. Has the Board coordinated with SED or Energy Division regarding the work that is occurring in the de-energization rulemaking?

Similarly, recommendation #8 relates to developing criteria & metrics for grid hardening projects that aim to mitigate the scope & impact of de-energization. The Public Advocates Office agrees that developing such criteria is important. However, it is unclear whether this is in the scope of the Wildfire Safety Division's responsibility & authority. The WSD's scope is focused on mitigating wildfire risk, not mitigating PSPS impact. It may be more appropriate to develop criteria for such grid hardening projects in the context of the de-energization rulemaking.