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June 15, 2020

VIA ELECTRONIC MAIL

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Subject: The Wildfire Safety Advisory Board's Draft Recommendations on 2021
Wildfire Mitigation Plan Guidelines, Performance Metrics, and Safety
Culture

I. INTRODUCTION

On June 2, 2020, the Wildfire Safety Advisory Board (WSAB) issued draft recommendations on the 2021 Wildfire Mitigation Plan guidelines, performance metrics, and safety culture. Pursuant to Public Utilities Code Section 8389(b), the WSAB is required to provide such recommendations to the Wildfire Safety Division (WSD) of the California Public Utilities Commission (Commission) by June 30, 2020.

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits these comments on the WSAB's draft recommendations. The Public Advocates Office appreciates the opportunity to provide input.

II. DISCUSSION & RECOMMENDATIONS

A. The Public Advocates Office supports the WSAB's recommendations on data and risk strategy.

Regarding data-informed and risk-informed strategies for reducing wildfire risk, the WSAB makes the following recommendations:

- Recommendation 3.1: Scientific review of modeling methods and assumptions,
- Recommendation 3.2: Development of a Data Access Portal for Federated Data Repositories and a Hierarchy of Permission to Access Wildfire Data and Modeling Methods, and
- Recommendation 3.3: Reporting Expert Qualifications and Scientific Justification for Decision-Making.

In order to strengthen the wildfire modeling efforts required pursuant to Public Utilities Code Section 8386(b),¹ the WSD should adopt all three of these interrelated recommendations. The adoption of Recommendation 3.2 (regarding the development of a data access portal) would facilitate access to data and modeling, but it is equally important that the work should be conducted by qualified people (Recommendation 3.3) using models and assumptions that are scientifically reviewed and vetted (Recommendation 3.1). Otherwise, time and resources invested in the effort on a data strategy may be wasted.

B. The Public Advocates Office supports the WSAB's recommendations to use the best available science in developing vegetation management practices.

WSAB recommendation 3.4 regarding aligning vegetation management practices with scientific evidence should be adopted. The need for better scientific evidence to support vegetation management practices was apparent in the utilities' most recent wildfire mitigation plans (WMP). In comments on San Diego Gas & Electric Company's (SDG&E's) 2020 WMP, the Public Advocates Office stated that SDG&E has not adequately supported its proposed vegetation management guidelines with data, and has not provided sufficient detail on its decision-making framework used to determine where to apply extended post-trim clearances.² The Wildfire Safety Division also identified shortcomings in how utilities identify at-risk trees and determine clearance distances.³

The electrical corporations' decisions regarding the implementation of vegetation management standards should be transparent and driven by the best available science and data. The WSAB recommends requesting that utilities provide additional details about their vegetation management decision-making process,⁴ and the Public Advocates Office supports this recommendation.

C. The Public Advocates Office supports the WSAB's recommendations regarding Public Safety Power Shutoff (PSPS) events.

The Public Advocates Office supports the adoption of WSAB's recommendations on a variety of improvements to the documentation of de-energization mitigation measures in the WMP

¹ Eight electrical corporations submitted wildfire mitigation plans as required by Public Utilities Code Section 8386(b): two of the plans were submitted by independent transmission owners (ITO) and six by investor-owned utilities (utilities). The ITOs plans were approved unconditionally (Resolution WSD-009, *Resolution Ratifying Action of the Wildfire Safety Division on Horizon West Transmission's and TransBay Cable's 2020 Wildfire Mitigation Plans Pursuant to Public Utilities Code Section 8386*, ratified by the Commission on June 11, 2020) and in practice, most of the WSAB's recommendations are more applicable to the utilities' WMPs.

² Comments of the Public Advocates Office on the 2020 Wildfire Mitigation Plans, pp. 24-25.

³ Draft Resolution WSD-003, Conditions PGE-18 and PGE-26; Draft Resolution WSD-004, Conditions SCE-12, SCE-14, and SCE-15; Draft Resolution WSD-005, Conditions SDGE-7, SDGE-8, SDGE-13, and SDGE-14.

⁴ California Wildfire Safety Advisory Board, Draft 2021 Recommendations, pp. 30-33.

guidelines. Specifically, the Public Advocates Office supports the recommendations discussed below.

1. Recommendation 1.1: Topical Organization by Wildfire Mitigation Program with a Focus on Lessons Learned

The WSAB’s proposal that the WMP guidelines should be organized to highlight de-energization via a dedicated chapter, in order to help the utilities “demonstrate the entire toolbox of mitigation strategies,” should be adopted.⁵ The recommendation correctly identifies (a) lessons learned, (b) directional vision for necessity of de-energization,⁶ (c) outlines of decision-making before, during, and after de-energization events, and (d) how other initiatives mitigate the need for de-energization as critical considerations. A utility’s⁷ comprehensive understanding of how it conducts a de-energization event should account for each of these elements. Recommendation 1.1 will support greater accountability in the IOUs’ de-energization decision making.

2. Recommendation 2.1: Risk Spend Efficiency Analysis Required for Each Mitigation Measure

The Public Advocates Office supports the WSAB’s recommendation that the 2021 WMP Guidelines stop characterizing de-energization events as a solution to the risk of wildfire in the Risk Spend Efficiency (RSE) analysis without simultaneously considering its broader societal consequences.⁸ Instead, the 2021 WMP Guidelines should require utilities to factor into their RSE calculations the assumed risk and cost to customers that result from a de-energization event. The WSAB correctly identifies the broad goal that wildfire mitigation tools should reduce the scope, duration, and re-energization timeline for de-energization events.

3. Recommendation 2.3: Risk Assessment and Mapping to Determine Location of Wildfire Mitigation Measures and Update CPUC Fire-Threat Maps More Frequently

The Public Advocates Office agrees with the WSAB’s assessment that a more holistic analysis of High Fire Threat District (HFTD) maps, alongside infrastructure risk assessment and mapping, is crucial to properly executing de-energization events.² The WSAB correctly observes that large swaths of urban areas that are in Tier 2 or 3 fire threat zones are not on the wildland urban interface. Urban areas in Tier 2 or 3 fire threat zones may require mitigations tailored to urban

⁵ California Wildfire Safety Advisory Board, Draft 2021 Recommendations, p. 13.

⁶ “Directional vision for the necessity of de-energization” refers broadly to the plan for strategically using de-energization to reduce the risk of wildfires, while recognizing the tremendous burden that such events impose on customers, especially those who are medically vulnerable.

⁷ Thus far, de-energization events have been used exclusively by utilities, rather than ITOs.

⁸ California Wildfire Safety Advisory Board, Draft 2021 Recommendations, pp. 19-20. For example many customers face economic losses, including through spoilage of food and closure of their businesses, as a result of de-energization events. For customers who depend on electricity to operate medical devices such as ventilators, de-energization events may be life threatening.

² California Wildfire Safety Advisory Board, Draft 2021 Recommendations, pp. 22-24.

areas to handle high wind events. The Public Advocates Office recommends that any urban-specific mitigations included in the WMPs should quantify the ability of those mitigations to decrease the need for de-energization on those circuits.

4. Recommendation 4.2: Community Outreach and Emergency Preparedness Performance Metrics and Data Reporting

The 2019 de-energization events involved failures to notify thousands of customers of impending de-energization events. As such, the Public Advocates Office supports the WSAB's recommendation that the 2021 WMP guidelines include progress metrics on community outreach and emergency preparedness, to better measure how the electrical corporations are engaging with their customers on the issue of de-energization notifications. The Public Advocates Office also recommends that the WSAB consider the extent to which this recommendation should apply to utilities (such as Pacific Gas and Electric Company) versus ITOs (such as Horizon West Transmission).

D. The WSAB should revise the recommended process for developing a Prudent Operator Standard.

The Public Advocates Office recommends that the WSAB revise Recommendation 4.1: Develop an Electric Utility Prudent Operator Standard. Specifically, this recommendation should be revised with respect to the *process* for developing a Prudent Operator Standard.¹⁰ The focus on consequences to customers as a result of de-energization events is particularly germane.¹¹ While WSD should have an important role in developing a Prudent Operator Standard, other stakeholders must be involved. Such a standard could have broad policy consequences and implicate general orders, inspection procedures, and other areas. Therefore, the development should be conducted through a formal Commission rulemaking. A Commission rulemaking is the best way to develop a record of stakeholder positions, entertain competing proposals, and elicit evidence to support a sound standard.

¹⁰ California Wildfire Safety Advisory Board, Draft 2021 Recommendations, p. 35.

¹¹ California Wildfire Safety Advisory Board, Draft 2021 Recommendations, pp. 35-37.

Marcie Edwards, Chair
Wildfire Safety Advisory Board
June 15, 2020
Page 5

III. CONCLUSION

The Public Advocates Office respectfully requests that the WSAB adopt the recommendations contained herein.

Respectfully submitted,

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Service List of Rulemaking 18-10-007