

From: [Ballon, Czar](#)
To: [Wildfire Safety Advisory Board](#)
Cc: [Wilbur, Brian](#); [Hauser, Ruben L.](#); [Garcia, Jaime R.](#); [Zewdu, Simon](#); [Hirashima, Scott](#); [Mckenzie, Rockeish](#); [Park, Elizabeth](#)
Subject: LADWP Comments on WSAB's Draft Guidance Advisory Opinion
Date: Monday, November 30, 2020 4:15:46 PM

Greetings,

The Los Angeles Department of Water and Power (LADWP) hereby submits its comments on the Wildfire Safety Advisory Board's (WSAB's) Draft Guidance Advisory Opinion. Please see below.

Comments from LADWP	
Recommendation #2	Plan Structure: Include Information about Governing Body Approval
Comment(s)	<p><i>The language of Public Utilities Code (PUC) 8387, as modified by Assembly Bill 1054, requires a publicly owned utility (POU) to present its wildfire mitigation plan (Plan) in a public meeting, but does not specify that the Plan must be approved by its governing body. However, the Wildfire Safety Advisory Board's (WSAB's) draft Guidance Advisory Opinion indicates that utilities must submit their Plan to their governing boards for approval. LADWP requests the WSAB to revise the language of Recommendation #2 to be consistent with the statutory language.</i></p>
Recommendation #3	Plan Structure: Independent Evaluations of the Wildfire Mitigation Plans Should Be More Specific and Less Repetitive
Comment(s)	<p><i>While PUC 8387 requires POUs to update their Plans annually, with a comprehensive revision occurring every three years, it does not specify the frequency at which a POU's Plan is to be independently evaluated. It is important to note that an independent evaluation of POUs Plans is not required to be completed on an annual basis. Given that the annual updates to the Plans are incremental, as an effective measure, POUs can assess and consider employing independent evaluators after the completion of the three-year comprehensive update of their Plan.</i></p> <p><i>Additionally, LADWP is concerned with evaluating "industry standards" and establishing "best practices" within independent evaluator reports. As stated in PUC 8387, the independent evaluator's role is to "review and assess the comprehensiveness of [the POU's] wildfire mitigation plan" in order to ensure adherence to the statutory requirements. LADWP does not believe it is the independent evaluator's role to prescribe which wildfire mitigation measures are best for a POU or if a POU's practices meet the so called "industry standards" or "best practices". It is ultimately up to the POU and its governing board to determine the appropriate safe and feasible wildfire mitigation practices based on the POU's specific risks, constraints, and opportunities. In addition, LADWP appreciates and recommends that the WSAB continue to provide valuable information sharing opportunities for POUs, such as the recent WSAB</i></p>

	<i>workshop, to learn from each other and industry experts.</i>
Recommendation #4	Plan Structure: Create Wildfire Mitigation Plan Templates Based on Utility Groupings, for Example Risk Profile and Type of Publicly Owned Utility
Comment(s)	<i>LADWP has serious concerns with the WSAB's proposal to create POU risk groupings. Arbitrarily categorizing a POU's wildfire risk based on high-level utility attributes may have far reaching consequences that impact a POU's credit rating and ability to obtain insurance coverage. LADWP proposes to allow POU's to determine their own risk rating through a wildfire risk assessment which considers risk drivers and aspects unique to each POU. If the intent of creating risk groupings is to understand a POU's risk profile and facilitate the review of the POU Plans, LADWP believes a template, similar to that proposed in Recommendation #1 of the Draft Guidance Advisory Opinion, would serve that purpose. Factors in such a template could include POU size, service territory within the High Fire Threat Districts (HFTD), size of customer base, etc.</i>
Recommendation #7	Customer Impacts: Utility Emergency Preparedness Separate and Apart from City or Municipal Emergency Preparedness
Comment(s)	<i>An insert on Page 13 of the WSAB's draft Guidance Advisory Opinion indicates Anaheim Public Utilities' sectionalization program reduces impacts resulting from an LADWP de-energization event. This is factually incorrect as LADWP does not have a direct system tie to Anaheim Public Utilities. Furthermore, LADWP did not find supporting language within Anaheim Public Utilities' wildfire mitigation plan to support this claim. LADWP requests that this language be removed.</i>

Regards,

Czar Gabriel M. Ballon

Electrical Engineering Associate

Power Regulatory Standards and Compliance

Los Angeles Department of Water and Power

111 N. Hope Street, Los Angeles, CA 90012

Email: Czar.Ballon@ladwp.com

Phone: (213) 367-0629

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