



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

August 26, 2020

Ms. Caroline Thomas Jacobs  
Director, Wildfire Safety Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Transmittal Via E-mail: [wildfiresafetydivision@cpuc.ca.gov](mailto:wildfiresafetydivision@cpuc.ca.gov)

**RE: Wildfire Safety Division Staff Proposal on Changes to Wildfire Mitigation Plan Requirements and Metrics Tables**

Dear Ms. Jacobs:

On behalf of the Rural County Representatives of California (RCRC), we offer comments on the Wildfire Safety Division's (WSD's) Staff Proposal on Changes to Wildfire Mitigation Plan (WMP) Requirements and Metrics Tables, published August 11, 2020. RCRC is an association of thirty-seven rural California counties, and the RCRC Board of Directors is comprised of elected supervisor from those member counties. RCRC is a party to the California Public Utilities Commission (CPUC or Commission) Wildfire Mitigations Plan Proceeding (R.18-10-007) as well as the De-Energization Proceeding (R.18-12-005), among others.

On the whole, the WSD is improving many aspects of WMPs, key among those changes are:

- Improving cross-utility comparisons through standardized data and formatting.
- Clarifying WMP inputs and refining the goals, objectives, and program targets to better receive quantifiable measurements and minimize inconsistencies.
- Adding a dedicated Public Safety Power Shutoff (PSPS) section. While there is a dedicated CPUC proceeding on this topic, we appreciate harmonizing these interrelated aspects of utility wildfire safety planning and mitigation, which is overdue.
- Adding CPUC directives from R.18-12-005 directing short, medium, and long-term actions to reduce the need for de-energization events as a mitigation tool.
- Requiring better risk-spend efficiency estimations for categories of mitigation.

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Among these improvements are opportunities for further enhancements. While we agree with the new metrics for community outreach and reporting of PSPS, several changes are necessary to provide better oversight over utility actions and ensure that the public is adequately safeguarded. Those changes include:

- Requiring better analysis of how far in advance a customer received notification of a PSPS event (New Section 8). CPUC Decision 19-05-042 requires that utilities, “whenever possible,” adhere to minimum notification timelines that provide 48-72 hour advanced notification to public safety partners and priority notification entities and provide 24-48 hour advanced notification to all other affected customers and populations.<sup>1</sup> The report should identify the intervals in which the customers were notified, such as less than 12 hours, 12-24 hours, 25-48 hours, or more than 48 hours in advance of a PSPS event.<sup>2</sup> Given that the CPUC identified different advanced notification timeframes for the public vs. public safety partners/priority notification entities<sup>3</sup>, the data should break out how many customers in each group were notified during which period. Overall, these aspects would further lend valuable insight into community outreach during PSPS.
- Requiring identification of the number of requests by public safety partners to delay de-energization or to reenergize a line to address concurrent emergencies, how many of those requests were granted and denied, and the reasons why any requests were denied.
- Requiring reporting of the number of medical baseline and/or medically sensitive customers who received PSPS mitigation assistance and an estimate of the number of customers in those groups who were impacted by the PSPS event and who did not receive any mitigation assistance other than notification.
- For information on the duration of PSPS events, the reports should require several additional details:
  - The percentage of impacted customers whose service was restored within 24 hours after the end of the event, as the CPUC expressed its intent that utilities “do everything possible to restore service to customers within 24 hours after the termination of a deenergization event.”<sup>4</sup>
  - The number of customers whose power was not restored within 24 hours after the end of the event and how long it took to fully restore power in the impacted area.
  - Whether power was fully restored to all impacted customers before the net discrete PSPS event, and if not, how many customers did not have service restored between events. Of particular note, utilities should disclose the

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<sup>1</sup> DECISION ADOPTING DE-ENERGIZATION (PUBLIC SAFETY POWER SHUT-OFF) GUIDELINES (PHASE 1 GUIDELINES), June 4, 2019, Page A8.

<sup>2</sup> Staff Proposal, page 19, Section H, c-f.

<sup>3</sup> These definitions should be consistent with those established in D.19-05-042 and D. 20-05-051.

<sup>4</sup> DECISION ADOPTING PHASE 2 UPDATED AND ADDITIONAL GUIDELINES FOR DE-ENERGIZATION OF ELECTRIC FACILITIES TO MITIGATE WILDFIRE RISK, June 5, 2020, Page 46

longest period of time any customer was without power as a result of a PSPS event (or multiple PSPS events when the customer never had power restored between the events).

While General Rate Cases are separate and determine actual utility cost recovery, WMPs are an appropriate forum to not only include an account of actual and planned spending for all mitigations, but should also consider broader ratepayer impact projections. Therefore, we urge the WSD to require estimations for economic losses suffered by a community during a PSPS event as a measurement of ratepayer impact. Utilities heavily lean on PSPS as a mitigation tool and that tool must be thoughtfully scrutinized for its effectiveness and feasibility, including internally at the corporate level.

With regard to Section 5, *Inputs to the plan and directional vision for WMP*, we recommend modifying recommended change 5a to read:

The goals of WMP should be the same for all: Documented reductions in the number of wildfires **and wildfire ignitions** caused by utility actions or equipment, **including vegetation contact**, and minimization of the societal consequences of both wildfires and the **any negative** mitigations employed to reduce them, including **such as** PSPS.

Reducing wildfire ignitions is a critical tenet of WMPs, and the WSD must clarify that wildfire mitigation measures should not be minimized on the whole. On the contrary, only the negative mitigation measures, such as the overuse of PSPS, should be reduced on a long-term basis. California's forests and wildlands, for example, are in dire need of fuels treatment and enhanced management on an ongoing basis from public and private entities to improve resilience and mitigate the type of catastrophic damage caused by a wildfire. Further, vegetation management will also help California meet carbon emissions reductions goals by reducing wildfire fuels that expend greenhouse gas emissions during wildfire events. Healthy forests are key to carbon sequestration. These mitigations are not "societal consequences" that should be minimized.

Our major concern with the Staff Proposal is the so-called refinement of Outcome Metrics' definition of Near Misses, replacing it with "Near Ignitions."<sup>5</sup> The Staff Proposal does not elaborate why the WSD feels Near Misses is inadequately defined, nor why it should be significantly narrowed. We strongly urge the WSD to abandon this recommendation. The new "Near Ignitions" definition, ironically, fails to take into account events that contribute to the probability of ignition, (which needs to be addressed through mitigation efforts identified in the WMP,) reverting the state back to the dangerous pre-2018 status quo. While we appreciate the WSD's acknowledgements that PSPS events

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<sup>5</sup> Staff Proposal, page 13.

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are an over-used wildfire mitigation tool<sup>6</sup>, by omitting events perpetrated by poor vegetation management as a near miss, like contacts with objects, not only will broad-based PSPS events continue in perpetuity, but communities will not be adequately safeguarded from a robust suite of options and outcomes to reduce fire danger from utility equipment and negligence. If a utility's equipment reaches the new definition of "Near Ignitions," which reads, "Events that manifest in *charring, melting, heavy smoke deposits*, and/or visible evidence of arching that could indicate *enough heat was present*, which could have led to an ignition" [emphasis added], wildfire mitigation efforts and planning have failed.

Finally, we urge the WSD to move forward with requiring data submissions from utilities quarterly, with annual WMP updates to take a more narrative form explaining changes in the data. This would be a leap forward for transparency and accountability.

Thank you for your consideration of our comments. Please do not hesitate to contact me if you have questions or would like to discuss further at (916) 447-4806 or [sheaton@rcrcnet.org](mailto:sheaton@rcrcnet.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", written in a cursive style.

STACI HEATON  
Senior Regulatory Affairs Advocate

cc: Service List, R.18-10-007

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<sup>6</sup> Reducing Utility Related Wildfire and Risk: Strategy and Roadmap for the Wildfire Safety Division, page 29 and Appendix 1, page 9.