

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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(Issued November 13, 2008)

Order Instituting Rulemaking To
Revise and Clarify Commission
Regulations Relating to the Safety
of Electric Utility and
Communications Infrastructure
Provider Facilities.

MUSSEY GRADE ROAD ALLIANCE PROPOSED PHASE 2 RULES

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I. INTRODUCTION

The Mussey Grade Road Alliance (“Alliance”) files proposed rule in accordance with Assigned Commissioner Simon’s ruling and scoping memo of November 5th, 2009,¹ which instructs parties to file and serve proposed rules for Phase 2 Rules by December 2, 2009.

II. PROPOSED RULE REGARDING FIRE DATA COLLECTION

A. Background of Proposed Rule

During Phase 1 of this proceeding, the Alliance entered a Proposed Rule Change (PRC) supporting the collection of fire data.² This PRC was proposed to help prevent wildland fires ignited by power lines through the collection of incident data. The intent of the PRC is that analysis of such data would provide a means to evaluate knowledge learned for practical application in rulemaking. This PRC would require electric utilities to provide data to the

¹ R.08-12-005; ASSIGNED COMMISSIONER’S RULING AND SCOPING MEMO FOR PHASE 2 OF THIS PROCEEDING (“Phase 2 Ruling and Scoping Memo”); Nov. 5, 2009.

² R.08-11-005; MUSSEY GRADE ROAD ALLIANCE PROPOSED REPORTING RULE TO BE IMPLEMENTED IN TIME FOR THE 2009 FIRE SEASON; Jan. 21, 2009. (Alliance Phase 1 Proposed Reporting Rule)

CPSD annually that would allow specific characteristics of power line fires to be identified and that could be used to formulate future fire prevention strategies. CPSD adopted this rule into its set of proposed changes, and included it in the initial set of Phase 1 PRCs. However, some utilities raised objections to this rule, primarily on the basis of cost and the proprietary nature of the data. The PRC was deemed to be controversial and was deferred to Phase 2. We resubmit it now.

B. Justification required by R.08-11-005 ruling and scoping memo.

The R.08-11-005 ruling and scoping memo requires that certain justifications be presented for any proposed rule.³ These justifications are given below.

1. The specific electric utilities, CIPs, and others affected by the PRC.

This data collection rule would affect electric utilities in high fire risk areas, including San Diego Gas and Electric Company (SDG&E), Southern California Edison (SCE), and Pacific Gas & Electric (PG&E).

2. Why the PRC is within the scope of Phase 2.

A data collection rule was brought forward by CPSD during Phase 1 of these proceedings, and placed into proposed revisions to GO 165. Thus, it is eligible for review during Phase 2 as per the Ruling and Scoping Memo:

*Item 23: CPSD's proposed revisions to GO 165 that were not resolved in Phase 1. (D.09-08-029, p. 41.)*⁴

3. New and/or revised text for the affected General Order(s), if applicable.

This PRC was originally presented by the Alliance during Phase 1.⁵ The text below is adapted from CPSD's latest revision of the Phase 1 rule change.⁶

³ Phase 2 Ruling and Scoping Memo; p. 9.

⁴ Id, p. 7.

Fire Incident Reporting and Data Collection Requirements

1. California investor-owned electric Utilities shall collect information on all fire incidents, which are attributable or allegedly attributable to their electric distribution lines or transmission lines. Data to be collected per incident shall include date, time, general location, specific geographical coordinates, equipment voltage, responsible party or equipment, fire agencies involved, weather conditions, vegetation conditions, and apparent cause. Collected data shall be provided electronically annually to the Director of CPSD or its successor, which may then make it available to state or local fire agencies or members of the public.

4. The specific fire hazard(s) addressed by the PRC and/or other reason(s) for the PRC.

“The rule would address obtaining information about power line fires so that specific fire threats can be identified, means of preventing these fires can be devised, and effectiveness of countermeasures can be evaluated.”⁷

5. How the PRC reduces or otherwise addresses the identified fire hazard(s) and/or achieves other intended purposes.

“Finally, the reduction of severe fires depends on the reduction in the number of ignitions. As MGRA stated in their January 21, 2009, filing: “the distinction between ‘minor’ and ‘significant’ incidents is artificial, since the severity of an incident usually does not depend upon details of how an ignition occurs, but rather the wind, humidity, and vegetation characteristics of the conditions that lead to rapid fire growth not being present.” (MGRA Proposed Rule, January 21, 2009, at p. 3.) Requiring electric utilities to collect data on fire

⁵ Alliance Phase 1 Reporting Rule, Jan. 21, 2009.

⁶ R.08-11-005; THE CONSUMER PROTECTION AND SAFETY DIVISION’S PROPOSED RULES TO BE IMPLEMENTED IN TIME FOR THE 2009 FALL FIRE SEASON; March 9, 2009. (CPSD March 6 Phase 1 Proposed Rules), pp. 13-14.

⁷ Op. Cite, p. 6.

incidents attributable or allegedly attributable to their power lines, whether minor or significant, could be used to develop strategies to avoid catastrophic fires. The proposed rule is designed to obtain information about power line fires so that specific fire threats can be identified, and means of preventing these fires can be devised. Moreover, pooled data collected by utilities should give a baseline by which the effectiveness of present and future corrective measures can be judged for cost-effectiveness.”⁸

6. The anticipated costs and benefits of the PRC.

“The proposed rule would likely entail some additional costs in collecting such data, however, as MGRA’s Dr. Mitchell pointed out, many electric utilities already collect fire data in one form or another, so it should not be too burdensome for them to present such data in a report. (See MGRA Proposed Rule, January 21, 2009, at p. 4.) Moreover, the rule is intended to collect data that is normally available during the course of regular maintenance and repair obligations.”⁹

7. Whether and how the costs will be recovered from customers.

Costs will be recovered no differently than as they currently are in electric utilities’ general rate cases.

8. Whether and how costs will be shared among electric utilities, CIPs, and others.

Costs apply only to IOUs.

9. Why it is in the public interest to adopt the PRC.

See Item 5, above. Also, full justification is provided in the Alliance’s original filing of January 21, 2009.¹⁰

⁸ CPSD March 6 Phase 1 Proposed Rules, pp. 23-24.

⁹ Id., p. 24.

¹⁰ Alliance Phase 1 Reporting Rule, Jan. 21, 2009.

10. If the PRC applies to electric transmission, why the rule does not conflict with other federal or state regulations

Data collection will not involve or impact transmission capabilities of the transmission lines that are operated by the utilities. SDG&E maintained data for transmission line fire incidents from 2004 to 2007.¹¹

11. Whether adoption of the PRC is exempt from CEQA and/or the National Environmental Policy Act (NEPA) and, if so, why. If not, what steps need to occur under CEQA and/or NEPA before the PRC can be adopted.

This PRC will not invoke CEQA and/or NEPA.

III. PROPOSED RULE REGARDING PROPERTY OWNER'S VEGETATION MANAGEMENT RIGHTS AND RESPONSIBILITIES

A. Background of Proposed Rule

Increased vegetation clearances around electrical lines were an important part of the Phase 1 scoping¹² and discussion,¹³ which resulted in an interim increase in the clearance and minimum trim distances required around electrical lines. Proposed rules were put forward by CPSD, PG&E, and SDG&E that would increase the required clearance distance from electrical lines in high and extreme fire hazard areas. A modified version of the proposed CPSD rule was finally adopted by the Commission, which set the minimum clearance distance at four feet and recommended trim distance of 6½ feet.¹⁴

One proposal that was of particular concern to the Alliance is the SDG&E proposed rule that would, if adopted, have required trim distances out to 25 feet from all electrical

¹¹ Presented in A.06-08-010; MG-20; PHASE 2 DIRECT TESTIMONY OF THE MUSSEY GRADE ROAD ALLIANCE; Appendix 2D; March 12, 2008.

¹² R.08-11-005; ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO; January 6, 2009. (Phase 1 Scoping Memo); p. 3 (Item #5).

¹³ Proposed tree trimming / vegetation management rules were put forward by CPSD, PG&E and SDG&E. Most parties commented on these proposals.

¹⁴ D.09-08-029; pp. 27-34.

conductors.¹⁵ This proposal was opposed by virtually all parties, and in the end was rejected by the Commission. However the modified CPSD proposal, as well as the alternative PG&E proposal does not set *upper limits* on the amount of maximum allowable trim. In the workshops, the Alliance successfully argued for the term “reasonable” to be applied to tree trimming and removal to discourage utilities from practices that greatly extend beyond the specified minimum trims.¹⁶

That electric utilities have the right and responsibility to maintain the vegetation around their facilities and conductors is not in dispute. However, none of the parties that put forward vegetation clearance rules presented evidence that linked vegetation clearance distance to fire threat.¹⁷ Even though a reasonableness standard should by definition be sufficient to protect trees and other vegetation from excessive and unreasonable trimming, electrical utilities may not apply a reasonableness standard consistently to their trimming actions due to the fact that the standard is interpreted differently by different electrical utilities. Landowners may also object to tree trimming and vegetation management practices that they themselves consider unreasonable. Real or potential objections by landowners to electric utility trimming led PG&E, in its proposed rule during Phase 1, to suggest language that would codify the right of utilities to trim at their own discretion due to real or potential landowner resistance.¹⁸

The Alliance observed how the new guidelines were applied by SDG&E during the 2009 cycle in the Mussey Grade area. While SDG&E did not put its own proposed PRC trimming guidelines into practice that would have removed 25 feet of vegetation around each conductor, it did trim substantially beyond the interim guidelines specified by the Commission. Trims were observed to be approximately ten feet in the radial direction, with more for vertical clearance. The addition of sycamore to the list of “hazard trees” led to significant tree and

¹⁵ R.08-12-005; MUSSEY GRADE ROAD ALLIANCE OPENING BRIEF FOR ORDER INSTITUTING RULEMAKING R.08-11-005; May 22, 2009. (Alliance Phase 1 Opening Brief).; pp. 2-3, pp. 8-16.

¹⁶ D.09-08-029; Attachment A; pp. 135-136.

¹⁷ It should be noted that the lack of data on vegetation related fires is another strong argument for fire data collection by utilities, as proposed by the Alliance.

¹⁸ Op. Cite; p. 128. PG&E states that “Sometimes property owners who have land where trees pose a threat to the electric lines (whether a fire threat, a safety issue or a reliability problem) may deny access to overhead lines for trimming or other vegetation management measures, or demand that trees be trimmed only to the stated “minimum” clearances “at “time of trim” in Rule 35 or the Appendix E guidelines.”

major limb removal (observed in the Mussey Grade Road area) out to at least 25 feet from the SDG&E lines, as reported to the Commission in the Communication of June 12, 2009.¹⁹

Of particular concern to the Alliance is the practice of removing major limbs even outside of its standard trim distance. As explained by the SDG&E arborist during his visit to this area,²⁰ these limb removals are ostensibly for the health of the tree, since it eliminates or lessens the frequency of further trimming. Improperly done, however, this practice can appear “ham-handed” and can lead to grotesque disfigurement of trees. It should be noted that such a practice reduces vegetation management costs to the utility by eliminating or significantly reducing the need for future trims. Apparently, the vegetation management guidelines approved by the Commission during this Rulemaking, and its admonition in previous decisions to avoid “ham-handed” tree trimming²¹ are insufficient to guide all utilities in making their choices and to ultimately obtain reasonable trimming results.

On the other hand, the electric utilities claim that the current standards do not provide them with sufficient support against landowners who resist utility entry for vegetation management beyond the legally required minimum trim distances.²² Neither the interim rule currently in place nor its predecessor addresses the related issues of power of entry onto land and reasonableness of trimming. It would clearly be in the interest of both electric utilities and landowners if the term “reasonable” was defined by the Commission within the rules so that property owners’ rights are preserved and electric utilities are guaranteed access to property for purposes of vegetation management.

Private property rights should be balanced in Commission rules against the duty of electric utilities to protect all property owners and citizens from hazards that might occur along their easements. Therefore, the utility right of entry onto private property to address provable hazards and a definition of reasonable vegetation management should be fully supported by the

¹⁹ R.08-12-005; MUSSEY GRADE ROAD ALLIANCE COMMUNICATION REGARDING 2009 SDG&E TRIMMING PRACTICES; June 12, 2009. (Alliance Trimming Communication).

²⁰ On June 4th, 2009, the Alliance spokesperson and fire expert met with the SDG&E forester and with the vegetation management program manager to discuss tree trimming in the Mussey Grade Road area after observing how far some trims were occurring from the electric conductors.

²¹ D.97-01-044; p. 6: “...to the extent that we promulgate any guidelines that may later be claimed to be a standard for reasonableness, we must act with a restrained hand. We must also temper our determination with aesthetic and environmental considerations to discourage ham-handed trimming by utilities.”

²² R.08-12-005; PACIFIC GAS AND ELECTRIC COMPANY’S (U39E) PHASE 2 PREHEARING CONFERENCE STATEMENT; October 6, 2009. (PG&E Phase 2 PHC Statement); p. 8, Item PG-6.

Commission. It is the Commission’s responsibility to balance the rights of landowners to have their vegetation trimmed in a reasonable manner against the duties of electric utilities to remove hazards, since electric utilities have a financial interest in reducing overall vegetation management costs and therefore cannot be considered unbiased brokers in this regard.

Based upon its own experience as an organization of property owners in hazardous fire areas, the Alliance suggests language to differentiate “reasonable” trimming from “ham-handed”, and processes that will help to prevent carelessness or abuse. Landowners who are informed of their rights and responsibilities will be less likely to raise objections, and if the definition of “reasonable” trim is made clear, they will be less able to raise unwarranted objections. Electric utilities, as well, will be required to obtain approval from landowners before taking discretionary actions outside of the standard trimming distances and will have their own limitations more clearly defined through defining “reasonable.”

B. Justification required by R.08-11-005 ruling and scoping memo.

The R.08-11-005 ruling and scoping memo requires that certain justifications be presented for any proposed rule.²³ These justifications are given below.

1. The specific electric utilities, CIPs, and others affected by the PRC.

This rule will affect SDG&E, SCE, PG&E, and all small electric providers regulated by the CPUC.

2. Why the PRC is within the scope of Phase 2.

Ruling and Scoping Item 5: “expedited trimming of vegetation that has been identified as needing to be trimmed”²⁴

Ruling and Scoping category 16 iii: “options for dealing with landowners who resist vegetation management”²⁵

²³ Phase 2 Ruling and Scoping Memo; p. 9.

²⁴ Phase 2 Ruling and Scoping, p. 4

²⁵ Phase 2 Ruling and Scoping, p. 6.

3. New and/or revised text for the affected General Order(s), if applicable.

Append the following text to Rule 35:

5. For the purposes of this Order, “reasonable” vegetation management practices mean trim of no more than two years of anticipated growth as determined by a certified arborist for healthy non-hazard trees. Trimming in excess of this amount will require permission of the property owner. If limbs or trees are removed in excess of two years anticipated growth on the basis of disease or hazard, the property owner shall be given the option to keep possession of the removed materials.

4. The specific fire hazard(s) addressed by the PRC and/or other reason(s) for the PRC.

Landowners who have electrical power lines crossing their property have a duty to their neighbors and communities to allow proper maintenance of these power lines, including vegetation management. Refusal to permit utility access and vegetation management puts not only their own property but the other properties at risk. Hence, the Commission should support the efforts of utilities to carry out their duties in this area.

However, the right of access must be recognized as effectively a police power, and as such must be constrained by a structure that recognizes the right of landowners to manage and enjoy their own property.

5. How the PRC reduces or otherwise addresses the identified fire hazard(s) and/or achieves other intended purposes.

This rule will reduce the potential for vegetation / power line contact by providing utilities of a tool that will expedite vegetation management on private property.

6. The anticipated costs and benefits of the PRC.

This PRC will provide the benefit of enhancing the ability of utilities to access private property where it is needed to address hazards caused by vegetation encroaching on power lines. Its limitation provisions will reduce damage to private property caused by overly aggressive, unreasonable trimming that goes significantly beyond the standards set in GO 95. By clarifying the responsibilities and rights of property owners, it has the potential to reduce litigation.

7. Whether and how the costs will be recovered from customers.

Costs will be recovered no differently than as they currently are in electric utilities' general rate cases.

8. Whether and how costs will be shared among electric utilities, CIPs, and others.

This PRC will affect only IOUs.

9. Why it is in the public interest to adopt the PRC.

Electric utilities are required by GO 95 to maintain vegetation clearance around their equipment. In order to carry out this duty, they have sometimes had to take action against unwilling property owners in order to gain access. While this may be justified in the interest of public safety, as the vegetation clearances are potentially increased as part of this proceeding, there is an increased likelihood that this vegetation management will lead to removal or significant disfigurement of vegetation. Equally of concern is that the clearances specified in GO 95 represent *minimum* clearances, and that some utilities are actively trimming far in excess of this minimum already. What recourse customers have if utilities wish to remove vegetation greatly in excess of the GO 95 standards is currently not clear, and this has led to unfortunate and historical interactions between landowners and utility personnel.

Establishing a clear limitation that explains to both landowners and utilities what constitutes appropriate trimming under the rules of the Commission will help to prevent unnecessary litigation, prevent unnecessary damage, and expedite utility access to hazardous conditions that need prompt attention.

10. If the PRC applies to electric transmission, why the rule does not conflict with other federal or state regulations

NA.

11. Whether adoption of the PRC is exempt from CEQA and/or the National Environmental Policy Act (NEPA) and, if so, why. If not, what steps need to occur under CEQA and/or NEPA before the PRC can be adopted.

This PRC would be exempt from CEQA because it *protects* habitat and vegetation along the ROWs of utility lines. The Alliance warned that greatly increasing the clearance distance around power lines (as called for in one utility proposal) could greatly increase the environmental impacts of utilities by eliminating tens of thousands of acres of vegetation.²⁶ By defining a “reasonableness” standard and applying it to utilities, this PRC can help to avert the potential invocation of CEQA / NEPA during a utility vegetation management cycle.

For example, if a property owner challenges utility vegetation management practices during the course of a vegetation management cycle (usually during a season of low fire risk), and demonstrates that these practices were “unreasonable”, CEQA / NEPA could potentially be invoked, and vegetation management could potentially be slowed or curtailed, which might expose residents to additional fire risk.

IV. PROPOSED RULE REGARDING WIND AND VEGETATION HAZARD MAPS AND AREAS

A. Background of Proposed Rule

The purpose of this Rulemaking is to reduce wildland fire hazards due to power lines. It was noted early in the proceeding that not all utility infrastructure is adjacent to vegetation that is capable of sustaining a catastrophic wildland fire, and that finding ways of differentiating which utility infrastructure poses and does not pose a wildland fire hazard would be a way of reducing the cost of any rule changes. Hence the suggestion was made that

²⁶ Alliance Phase 1 Opening Brief, May 22, 2009, pp. 11-13.

the Cal Fire Threat maps be adopted for use by the Commission in Phase 1 as a basis for applying Phase 1 rule changes.²⁷

The Alliance stated during the workshops that not only vegetation but *wind* is a key factor in increasing the risk of catastrophic power line fires. There are some places, geographically, that have higher wind speeds than others under certain conditions (such as Santa Ana windstorms). By identifying areas that have both high winds and vegetation, the Commission and utilities would be able to take extra precautions, and possibly lessen the performance standards in areas that are expected to pose less of a threat. Such knowledge will allow resources to be applied in the most effective manner.

In parallel with the Phase 1 workshops, investigations into the October 2007 fires were carried out by CPSD and DRA. A number of wind-modeling methods were applied in an effort to reconstruct estimates for wind speeds throughout the October 2007 event. These resulted in wind intensity maps.²⁸ The authors of these wind maps agree that it may be feasible to create equivalent wind maps for typical extreme wind conditions throughout California.²⁹ It would then be possible to overlay these maps on Cal Fire's vegetation hazard maps to create a composite that would indicate both high winds and hazardous vegetation -- areas that the risk of catastrophic power line fires will be the greatest.

Practical goals for this phase of the Rulemaking would be to establish the practicality of this approach to making power line fire hazard maps, which include both wind intensity and vegetation data, to estimate their accuracy, and to generate sample maps for specific areas.

B. Justification required by R.08-11-005 ruling and scoping memo.

²⁷ Initial suggestion by SCE; SCE Proposed Rules pp. 8-9. Discussed at length by parties in the February 26th, 2009 and other workshops.

²⁸ I.08-11-006 CPSD Rebuttal Testimony; p. 3-7.

²⁹ The Alliance has initiated contacts with Professors M. Moritz and D. Saah to gauge the feasibility and practicality of this approach to creating hazard maps that are tuned to the specific needs of the Commission and utilities in their attempts to reduce wildland fire ignitions.

The R.08-11-005 ruling and scoping memo requires that certain justifications be presented for any proposed rule.³⁰ These justifications are given below.

1. The specific electric utilities, CIPs, and others affected by the PRC.

This PRC will affect Southern California utilities, specifically SDG&E and SCE, as well as all CIPs doing business in California because it has to do with the definition of the Southern California wildland fire hazard zones.³¹ LADWP might also benefit from this RPC. This RPC would change the reporting rules and vegetation requirements in the affected areas.

2. Why the PRC is within the scope of Phase 2.

Phase 2 Ruling and Scoping Memo items number 15 (iv) and (v) state:

“ (iv). How the Fire Threat Maps used by utilities should be updated and the implications for utilities that relied on previous Maps when Cal Fire creates new Maps.

(v) Whether a better, utility-specific map can be developed.”

This RPC consists of the construction of a better utility-specific map that includes high wind areas as the basis of its hazard assessment, and suggests a schedule for the review and updating of power line fire hazard maps.

3. New and/or revised text for the affected General Order(s), if applicable.

Purpose of this PRC is to initiate study into production of wind maps that would replace the Cal Fire Threat maps with maps that combine the Cal Fire Threat map vegetation data with expected geographic wind intensity variations during “Santa Ana” wind conditions based upon analytical wind modeling of the Southern California region. Since these maps do not yet exist, no corresponding title is proposed yet, but our goal will be an Ordering Paragraph directing how such maps will be prepared and updated. Language will be proposed in the workshops once the feasibility of creating predictive maps has been established.

³⁰ Phase 2 Ruling and Scoping Memo; p. 9.

³¹ Phase 2 Ruling and Scoping Memo; p.5.

4. The specific fire hazard(s) addressed by the PRC and/or other reason(s) for the PRC.

The purpose of Rulemaking R.08-11-005 is to address fire hazards arising from utility poles. During Phase 1 of the Rulemaking, it was decided that the greatest potential for power line fires occurs where there is a nexus between flammable vegetation and power lines. For this reason, the Cal Fire Threat map was used as a basis to identify hazard areas for the purposes of Phase 1. This map, however, does not take wind intensity into account, and wind intensity is strongly tied to the conditions under which power lines can cause an ignition, either through failure of the electrical infrastructure itself or of other materials or structures adjacent to the power lines. Using analytical methods, it is likely that maximum relative wind speeds over a wide geographic area can be estimated. Applying this information in conjunction with the Cal Fire Threat maps, it should be possible to construct maps that more accurately identify windy and vegetated areas at greatest risk of power line ignition.

Utilities are required to take “known local conditions” into account when designing their infrastructure. (*“To reduce fire hazards, it is reasonable to clarify existing the requirement in Rule 38 (Table 2) of General Order 95 of taking **known local conditions** into account when designing, constructing, and maintaining facilities, specifically conductor separation, in areas subject to high winds.”*)³² Adding a wind component to existing fire hazard maps will allow a clearer specification of local conditions, and should increase the effectiveness and reduce the cost of measures to protect against wildland fire ignitions by power lines.

5. How the PRC reduces or otherwise addresses the identified fire hazard(s) and/or achieves other intended purposes.

If a given amount of resources are to be committed to power line safety and wildland fire prevention, it is clear that the greatest reduction of wildland fire risk will be achieved by applying these resources in the areas where catastrophic power line fires are most likely to start. This was the original intent in Phase 1 of using the Cal Fire Threat maps as the basis for

³² D.09-08-029; p. 51.

identifying Extreme and Very High Fire Threat Zones. It was widely acknowledged at that time (most specifically by Cal Fire³³) that these maps are not ideal for identifying hazards.

6. The anticipated costs and benefits of the PRC.

There will be added cost for re-generating these maps based upon new Cal Fire surveys and improvements in scientific software every five years. Cal Fire generally funds its own vegetation and fire threat maps, so the Commission or utilities would need to generate only the wind hazard maps. If initial studies demonstrate the creation of reliable wind maps is feasible, it should be possible for a small team of weather and engineering experts to generate these maps in a small amount of time. Hence, the overall costs should be reasonable.

This cost, however, will be dwarfed by the cost savings that can potentially be obtained by focusing utility and CPUC resources on the areas most under threat of wildland fire ignition by power lines. For a given amount of resources expended, application of maps that accurately identify hazard areas will result in a greater reduction in power line fires (and a commensurate cost savings).

7. Whether and how the costs will be recovered from customers.

Costs will be recovered no differently than as they currently are in electric utilities' general rate cases

8. Whether and how costs will be shared among electric utilities, CIPs, and others.

Costs apply to electric utilities and CIPs, since both would benefit from more specific hazard maps.

9. Why it is in the public interest to adopt the PRC.

³³ R.08-11-005; Opening Comments of Cal Fire on Proposed Rules (Cal Fire Phase 1 Comments); March 27, 2009, pp. 2-5.

The purpose of this Rulemaking is to reduce the risk to the public from wildland fires ignited by power lines by adopting changes to GO 95 and GO 165 that will help to reduce this risk. The public will also be required to fund these risk-reduction efforts, since increasing safety standards will usually require additional expenditures. Being able to target risk areas more accurately will optimize public safety by reducing fire losses, while at the same time reducing the cost required to achieve a given safety standard.

10. If the PRC applies to electric transmission, why the rule does not conflict with other federal or state regulations

Fire hazard maps consisting of wind intensity and vegetation factors and relate to geographic areas currently do not exist. Such mapping would be available to other federal or state agencies to complement their general work and if they wished to apply transmission safety regulations on a finer-grained geographic basis, but this would be up to the individual agencies.

11. Whether adoption of the PRC is exempt from CEQA and/or the National Environmental Policy Act (NEPA) and, if so, why. If not, what steps need to occur under CEQA and/or NEPA before the PRC can be adopted.

By reducing the number of catastrophic wildland fires started by power lines, this PRC has the potential to improve environmental quality and it is therefore likely to be exempt from CEQA and NEPA.

V. PROPOSED RULE REGARDING CONTINGENCY PLANNING FOR EXTREME WIND EVENTS

A. Background of Proposed Rule

It may not be reasonable to engineer electrical infrastructure against all possible weather contingencies. Tornados and hurricanes, for instance, have winds far in excess of GO 95 specified requirements, but because these weather conditions very rarely occur in California, they are not considered a contingency that needs to be solved for.

We do not know the “worst case” extreme dry wind conditions that can occur in California. However, the Alliance has shown in its submittals that the consequences of a truly extreme event (significantly greater than the October 2007 wind storm, for instance) would be dire, because the number of expected ignitions goes up very rapidly as the wind speed increases – much faster than a linear increase.³⁴ Should such an event occur, California could be faced with a veritable “wall of fire” stretching from Ventura County to San Diego.

Statistical analysis of past historical weather data can be used to estimate maximum wind loadings expected within a given time frame³⁵. It is standard engineering practice when designing for catastrophic loadings to use the typical time expected for an extreme event that would exceed design limits – and this can and should be a very long time. We propose 500 years, which is similar to earthquake design requirements in California. Fortunately, physical infrastructure hardening may not be necessary to meet this requirement – it could be that operational countermeasures (such as turning off the power) could effectively prevent the catastrophic scenario in which fires are started when winds greatly exceed design limits. It should be emphasized that operational countermeasures are no panacea and can cause physical and financial harm to residents and customers, and must only be used when much greater harm from power line fires would be the likely consequence if they are not.

B. Justification required by R.08-11-005 ruling and scoping memo.

The R.08-11-005 ruling and scoping memo requires that certain justifications be presented for any proposed rule.³⁶ These justifications are given below.

1. The specific electric utilities, CIPs, and others affected by the PRC.

All electric utilities will be affected by this PRC, including SDG&E, SCE, and PG&E.

³⁴ A.08-12-021; MGRA Opening Comments; Appendix A; pp. 1-6.

³⁵ In fact, SDG&E applied such an approach for the creation of its wind loading estimates for the Sunrise Powerlink transmission line. A.06-08-010; Sunrise Powerlink Project; SDG&E’s 3/3/08 Responses to MGRA Data Request No. 6; MGRA-46 to MGRA-49. <http://www.sdge.com/sunrisepowerlink/info/MGRADR6Responses3-3-08.doc>
This method assumes that the extreme events are statistical “outliers” of weather processes that are currently occurring, but does not take into account potential changes to current conditions – due to climate change, for example.

³⁶ Phase 2 Ruling and Scoping Memo; p. 9.

2. Why the PRC is within the scope of Phase 2.

Phase 2 Ruling and Scoping Memo, Item 6: *“This proceeding may consider measures to mitigate the risk of wildfire ignitions from high winds”*³⁷

This PRC will clarify that utilities must take countermeasures to prevent catastrophic fire starts should wind speeds greatly exceed specified GO 95 loadings.

3. New and/or revised text for the affected General Order(s), if applicable.

Add a Part C to General Order 95 Rule 18:³⁸

Electric utilities shall have in place contingency plans for identifying foreseeable hazard conditions that exceed wind loadings of Rule 43 in Extreme and Very High Fire Threat Zones during periods of high fire danger. These plans shall include measures to prevent ignitions of wildland fires by equipment that meets GO 95 wind loading and vegetation management requirements. For the purposes of this Order, foreseeable hazard conditions are extreme conditions that have a 10% or greater probability of occurrence in 50 years.

4. The specific fire hazard(s) addressed by the PRC and/or other reason(s) for the PRC.

The Alliance in its filings before the Commission has identified the potential for catastrophic fire storms caused by multiple power line conditions under extreme weather conditions:

“One general conclusion that can be reached is that the number of fires will grow with a greater than linear dependency on wind speed, possibly much greater than linear. If wind gusts greatly exceeding design limits were to strike the network they would cause a myriad of ignitions, which under those conditions would lead to catastrophic consequences. Wind events with multiple power line ignitions, such as that of October 2007, provide an indication of the threshold for the rapid increase in ignitions with increasing wind speed.

³⁷ Phase 2 Ruling and Scoping Memo, p. 4.

³⁸ D.09-08-029, Attachment B, p. 4.

One disturbing fact is that current California design guidelines allow for design wind loadings less than those observed in Santa Ana wind storms. This and other regulations affecting fire safety require urgent review.”³⁹

It is the general understanding of the Commission that winds exceeding design limits for an electrical network would constitute an emergency that would necessitate the removal of power from the electrical network:

“SDG&E’s statutory obligation to operate its system safely requires SDG&E to shut off its system if doing so is necessary to protect public safety. For example, there is no dispute that SDG&E may need to shut off power in order to protect public safety if Santa Ana winds exceed the design limits for SDG&E’s system and threaten to topple power lines onto tinder dry brush.”⁴⁰

5. How the PRC reduces or otherwise addresses the identified fire hazard(s) and/or achieves other intended purposes.

It is likely to be expensive for utilities to construct physical infrastructure that can withstand events that would greatly exceed the GO 95 design limits. Fortunately, operational countermeasures such as turning off the power would effectively prevent a catastrophic scenario. The Commission has stated that it expects that utilities would take such actions should such a scenario occur. However, there is currently no mechanism in place that requires utilities to be able to identify such events or differentiate extreme events from events which will not create conditions outside of the ordinary GO 95 design and maintenance requirements.

Specifying a definition of “foreseeable hazard” in terms of a recurrence time (in this case, 500 years) is in line with design requirements for other catastrophic scenarios such as earthquakes, and is commonly used for seismic design for electrical infrastructure.⁴¹ Adopting

³⁹ R.08-11-005; MUSSEY GRADE ROAD ALLIANCE PRE-HEARING CONFERENCE STATEMENT; Appendix A (Mitchell, Joseph W.; Power Lines and Catastrophic Wildland Fires in Southern California; Fire & Materials 2009; San Francisco, CA; January 26-28, 2009), February 2, 2009. (Mitchell, 2009)

⁴⁰ D.09-09-030; pp. 61-62.

⁴¹ An example can be found in SDG&E’s testimony for its Sunrise Powerlink application A.06-08-010: “The 72-year ground motion is sometimes used to check that a building or facility remains operational with no structural

such a criterion would enable utilities to know what conditions they should be designing their contingency plans for. It would allow the utilities, and possibly the Commission, to determine whether it is more appropriate to mitigate the hazard through upgrade of physical infrastructure or whether operational countermeasures would be more effective.

6. The anticipated costs and benefits of the PRC.

Adopting this PRC would mean that electrical utilities would need to put together a mechanism to monitor hazard conditions within their networks using existing weather station data, and to coordinate with forecasting agencies such as the National Weather Service, fire agencies such as Cal Fire, and possibly contracted companies.

Historical weather station data may be utilized to estimate the maximum wind speeds that can be expected based on standard statistical methods. Such a mechanism was used by SDG&E to predict wind loadings for its Sunrise Powerlink transmission line project.⁴² There will be some minimal cost for this analysis.

The benefit of this PRC is that it would reduce the potential for extreme Santa Ana wind events that could be characterized by multiple ignitions by downed powerlines and vegetation-line contact. An event of significantly greater intensity than the one experienced in October 2007 would be likely to cause many power-line ignitions from Ventura County to San Diego, under weather conditions making the fires almost impossible to suppress. Many billions of dollars of damage could be expected were such an event to occur. This PRC would help to prevent such a scenario at a relatively modest cost.

It should be emphasized, however, that D.09-09-030 found that significant harm and costs can be incurred by the shut-off of electrical power, which is required for the health and

damage. Until recently, the 475-year ground motion was the basis for the seismic coefficients appearing in codes, such as UBC. This ground motion has been replaced by the 2,475-year ground motion, which has become the primary basis for determining the seismic coefficients in new codes, such as the IBC. The first edition of the IBC was published in 2000 as a replacement of the UBC. A 950-year ground motion (~975-year motion) is defined as the Upper Bound Earthquake for hospital design in California, for example.” (SD-141; C. B. Crause; Earthquake Ground-Motion Evaluation for Imperial Substation, Imperial Valley, California; Technical Memorandum to Michael Hatch; June 23, 2003.)

⁴² A.06-08-010; Sunrise Powerlink Project; SDG&E’s 3/3/08 Responses to MGRA Data Request No. 6; MGRA-46 to MGRA-49. <http://www.sdge.com/sunrisepowerlink/info/MGRADR6Responses3-3-08.doc>

safety of residents. Only under circumstances where much greater harm is *likely* – specifically under which wind conditions exceed design limits for the electrical network components – does the Commission accept that operational countermeasures such as shut-off are reasonable.

7. Whether and how the costs will be recovered from customers.

Costs will be recovered no differently than as they currently are in electric utilities' general rate cases.

8. Whether and how costs will be shared among electric utilities, CIPs, and others.

Costs apply only to electric utilities.

9. Why it is in the public interest to adopt the PRC.

The purpose of this PRC is to prevent catastrophic damage by extreme wind events that may subject electric networks to conditions that might exceed GO 95 wind loading and vegetation management requirements. See response to #4, above.

10. If the PRC applies to electric transmission, why the rule does not conflict with other federal or state regulations.

Due to the higher reliability standard placed upon transmission, it is less likely that transmission lines will be intentionally de-energized during extreme events. This increases the importance of determining the maximum foreseeable wind speed that might be encountered by this infrastructure so that proper design requirements can be set. The Commission has already taken a role in regulating transmission infrastructure safety requirements, and required an exhaustive EIR to be conducted for the Sunrise Powerlink transmission project (A.06-08-010). Regardless of jurisdictional boundaries, however, information regarding recurrence times for extreme events may be incorporated into regulations by other state or federal agencies.

11. Whether adoption of the PRC is exempt from CEQA and/or the National Environmental Policy Act (NEPA) and, if so, why. If not, what steps need to occur under CEQA and/or NEPA before the PRC can be adopted.

By reducing the number of catastrophic wildland fires started by power lines, this PRC has the potential to improve environmental quality and it is therefore likely to be exempt from CEQA and NEPA.

VI. REFERENCES

D.09-08-029; DECISION IN PHASE 1 – MEASURES TO REDUCE FIRE HAZARDS IN CALIFORNIA BEFORE THE 2009 FALL FIRE SEASON; Aug. 20, 2009.

D.09-09-030; DECISION DENYING WITHOUT PREJUDICE SAN DIEGO GAS & ELECTRIC COMPANY’S APPLICATION TO SHUT OFF POWER DURING PERIODS OF HIGH FIRE DANGER; Sept. 10, 2009.

I.08-11-006; Rebuttal Testimony of the Consumer Protection and Safety Division to the Direct Testimony of San Diego Gas & Electric Company Regarding the Formal Witch and Rice Fire Investigations; June 22, 2009. (CPSD Rebuttal Testimony).

A.08-12-021; MGRA Opening Comments; Appendix A; Mitchell, Joseph W; M-bar Technologies and Consulting, LLC for the Mussey Grade Road Alliance; “WHEN TO TURN OFF THE POWER? COST/BENEFIT OUTLINE FOR PROACTIVE DEENERGIZATION”; March 27, 2009; p. 12.

R.08-12-005; ASSIGNED COMMISSIONER’S RULING AND SCOPING MEMO FOR PHASE 2 OF THIS PROCEEDING (“Phase 2 Ruling and Scoping Memo”); Nov. 5, 2009.

R.08-12-005; PACIFIC GAS AND ELECTRIC COMPANY’S (U39E) PHASE 2 PREHEARING CONFERENCE STATEMENT; October 6, 2009. (PG&E Phase 2 PHC Statement)

D.09-08-029; DECISION IN PHASE 1 – MEASURES TO REDUCE FIRE HAZARDS IN CALIFORNIA BEFORE THE 2009 FALL FIRE SEASON; August 20, 2009

R.08-12-005; MUSSEY GRADE ROAD ALLIANCE COMMUNICATION REGARDING 2009 SDG&E TRIMMING PRACTICES; June 12, 2009. (Alliance Trimming Communication).

R.08-12-005; MUSSEY GRADE ROAD ALLIANCE OPENING BRIEF FOR ORDER INSTITUTING RULEMAKING R.08-11-005; May 22, 2009. (Alliance Phase 1 Opening Brief).

R.08-11-005; Opening Comments of Cal Fire on Proposed Rules (Cal Fire Phase 1 Comments); March 27, 2009.

R.08-11-005; THE CONSUMER PROTECTION AND SAFETY DIVISION’S PROPOSED RULES TO BE IMPLEMENTED IN TIME FOR THE 2009 FALL FIRE SEASON; March 9, 2009. (CPSD March 6 Phase 1 Proposed Rules).

R.08-11-005; CPSD March 6 Proposed Rules, Attachment A; March 9, 2009

R.08-11-005; MUSSEY GRADE ROAD ALLIANCE PROPOSED REPORTING RULE TO BE IMPLEMENTED IN TIME FOR THE 2009 FIRE SEASON; Jan. 21, 2009. (Alliance Phase 1 Proposed Reporting Rule)

R.08-11-005; MUSSEY GRADE ROAD ALLIANCE PRE-HEARING CONFERENCE STATEMENT; Appendix A (Mitchell, Joseph W.; Power Lines and Catastrophic Wildland Fires in Southern California; Fire & Materials 2009; San Francisco, CA; January 26-28, 2009), February 2, 2009. (Mitchell, 2009)

R.08-11-005; RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE REQUEST FOR PARTIES TO FILE PROPOSED RULE CHANGES FOR CONSIDERATION DURING PHASE I OF THIS PROCEEDING; January 21, 2009. (SCE Proposed Rules)

R.08-11-005; ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO; January 6, 2009. (Phase 1 Scoping Memo)

A.06-08-010; MG-20; PHASE 2 DIRECT TESTIMONY OF THE MUSSEY GRADE ROAD ALLIANCE; Appendix 2D; March 12, 2008.

A.06-08-010; Sunrise Powerlink Project; SDG&E's 3/3/08 Responses to MGRA Data Request No. 6; MGRA-46 to MGRA-49.

<http://www.sdge.com/sunrisepowerlink/info/MGRADR6Responses3-3-08.doc>

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VERIFICATION

I am the representative of the **MUSSEY GRADE ROAD ALLIANCE**, intervenor herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 16th day of December, 2009 at Ramona, California.

/s/ Diane Conklin

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VERIFICATION

I am the subject matter expert for the **MUSSEY GRADE ROAD ALLIANCE**, intervenor herein. I am the founder of M-bar Technologies and Consulting, LLC, a wildland fire research and consulting company. The technical data in this document is true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

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CERTIFICATE OF SERVICE

I hereby certify that pursuant to the California Public Utilities Commission's Rules of Practice and Procedure, I have served a true copy of the **MUSSEY GRADE ROAD ALLIANCE PROPOSED PHASE 2 RULES** to all parties on the service list for Rulemaking No. 08-11-005 via electronic mail.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

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