



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

**FILED**  
4-03-17  
04:59 PM

Order Instituting Rulemaking to Develop and  
Adopt Fire-Threat Maps and Fire-Safety  
Regulations.

R.15-05-006  
(Filed May 7, 2015)

**CITY OF LAGUNA BEACH OPENING COMMENTS ON MARCH 10, 2017  
ADMINISTRATIVE LAW JUDGES' RULING INVITING COMMENTS REGARDING  
WHETHER DECISION 17-01-009 SHOULD BE MODIFIED SO THAT THE  
DEVELOPMENT OF FIRE MAP 2 IS COMPLETED UPON THE COMMISSION'S  
ADOPTION OF SHAPE B**

David L. Huard  
Lilly B. McKenna  
Manatt, Phelps & Phillips, LLP  
One Embarcadero Center, 30th Floor  
San Francisco, CA 94111  
Tel: (415) 291-7400  
Fax: (415) 291-7474  
dhuard@manatt.com  
lmckenna@manatt.com  
*Attorneys for City of Laguna Beach*

April 3, 2017

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

Order Instituting Rulemaking to Develop and Adopt  
Fire-Threat Maps and Fire-Safety Regulations.

R.15-05-006  
(Filed May 7, 2015)

**CITY OF LAGUNA BEACH OPENING COMMENTS ON MARCH 10, 2017  
ADMINISTRATIVE LAW JUDGES' RULING INVITING COMMENTS REGARDING  
WHETHER DECISION 17-01-009 SHOULD BE MODIFIED SO THAT THE  
DEVELOPMENT OF FIRE MAP 2 IS COMPLETED UPON THE COMMISSION'S  
ADOPTION OF SHAPE B**

As directed by the assigned Administrative Law Judges (“ALJ”) Timothy Kenney and Valerie U. Kao, the City of Laguna Beach (“Laguna Beach” or the “City”) hereby submits its opening comments on the *Administrative Law Judges’ Ruling Inviting Comments Regarding Whether Decision 17-01-009 Should be Modified so That The Development of Fire Map 2 is Completed Upon The Commission’s Adoption of Shape B*, filed March 10, 2017 (“Ruling”).<sup>1</sup>

The recent Ruling requests comment as to whether Decision 17-07-009 should be modified so that (1) the final map product is Shape B, and (2) the requirement to develop Shape C is deleted. Laguna Beach does not oppose this proposal and agrees that the added step in developing Shape C may not be essential to achieving the Commission’s purpose of creating a Fire Map that designates areas and communities that face elevated risks of utility-associated wildfires, since Shape B will already demarcate three different tiers of risk.

Laguna Beach also recognizes the utilities’ concern that public disclosure of detailed mapping information of utility infrastructure could pose a security risk. Still, Laguna Beach simultaneously recognizes the value of understanding where utility infrastructure is

---

<sup>1</sup> Ruling, p. 7.

located to assist in identifying or possibly responding to wildfire threats caused by utility infrastructure. Therefore, Laguna Beach recommends that such mapping information be shared, on a confidential basis if needed, with emergency responders and limited city officials to facilitate local understanding of utility threats. Laguna Beach is submitting a proposed regulation, pursuant to the direction of this proceeding, that would require utilities to work with communities that fall within a high-fire threat zone to collaborate on policies and initiatives to improve safety and reduce the risk for utility-caused wildfires.<sup>2</sup> This process could serve as a forum to share such mapping information on a limited and secure basis.

In conclusion, Laguna Beach does not oppose the removal of the requirement to prepare Shape C and supports the streamlining of the Fire Map process. However, Laguna Beach recommends that the value that would have been achieved through Shape C's development, namely, information regarding the location of utility infrastructure, be considered for inclusion in discussions with local communities that will be required to respond to and guard against utility-caused wildfires.

---

<sup>2</sup> D.17-01-009, *Order Instituting Rulemaking to Develop and Adopt Fire-Threat Maps and Fire-Safety Regulations*, dated January 19, 2017, p. 89, Ordering ¶ 11 (inviting parties to submit proposed regulations).

April 3, 2017

Respectfully submitted,

MANATT, PHELPS & PHILLIPS, LLP

By: /s/ David L. Huard  
David L. Huard

David L. Huard  
Lilly B. McKenna  
Manatt, Phelps & Phillips, LLP  
One Embarcadero Center, 30th Floor  
San Francisco, CA 94111  
(415) 291-7400  
DHuard@manatt.com  
LMcKenna@manatt.com

***Attorneys for City of Laguna Beach***

318477889.1