



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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

Rulemaking 15-05-006
(Filed May 7, 2015)

JOINT OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY
(U338-E), PACIFIC GAS AND ELECTRIC COMPANY (U39-E) AND PACIFICORP
(U901-E) ON ADMINISTRATIVE LAW JUDGE RULING

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I.

INTRODUCTION

Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E) and PacifiCorp, d/b/a Pacific Power (PacifiCorp and collectively with SCE and PG&E, Joint Electric Utilities) submit these comments in response to the March 10, 2017 Administrative Law Judge’s 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 (Ruling).¹

II.

COMMENTS

With respect to the six questions included in the Ruling, the Joint Electric Utilities comment as follows:

¹ Pursuant to Rule 1.8(d), SCE has been authorized to file these Joint Opening Comments on behalf of PG&E and PacifiCorp.

Item 1: Whether D.17-01-009 should be modified so that (i) the final map product is Shape B, and (ii) the requirement to develop Shape C is deleted.

Comment on Item 1: The Joint Electric Utilities do not object to (1) the final map product being Shape B, and (ii) deleting the requirement to develop Shape C, as long as the expert review and quality control steps are incorporated into the Shape B process. D.17-01-009 can be modified to eliminate Shape C with alteration, but without acceleration of the existing schedule.

Item 2: Whether Shape C is necessary to achieve the Commission's objective for Fire Map 2 of delineating the boundaries of a new High Fire-Threat District where stricter fire-safety regulations apply, or whether the Commission's objective can be achieved with Shape B (and without Shape C).

Comment on Item 2: The Joint Electric Utilities believe the Commission's Fire Map 2 objective of delineating the boundaries of a new High Fire-Threat District, where stricter fire-safety regulations apply, is achievable with the production and adoption of Shape B as the final Fire Threat Map. However, given that D.17-01-009 contemplated the development of Shape C (Row 11 of Table 1) to include an expert review, quality control assessment, and communication steps between the Territory Leads, Peer Development Panel, and Independent Review Team for the proposed final Tier 2 and Tier 3 boundaries, the Joint Electric Utilities believe the Ruling's proposed 25-day reduction to the mapping development timetable, and the resultant elimination or truncation of the review and quality control steps, would be detrimental to the accuracy of the final Fire-Threat Map.

The purpose of Fire Map 2 is to designate areas where there is an elevated hazard for utility-associated wildfires to occur and spread rapidly, and where communities face an elevated risk from such wildfires. This cannot be accomplished without using utility infrastructure information during development of the maps boundaries and tiers. The final review and quality control process intended for Shape C is still necessary to develop an accurate state-wide utility fire threat map. Territory Leads and the Peer Development Panel will need the time allotted for

Shape C during Shape B development to ensure appropriate levels of local knowledge and stakeholder input are incorporated. These inputs are crucial to the map's development, and accuracy.

Item 3: Whether Shape C is needed by electric utilities and communications infrastructure providers to implement the stricter fire-safety regulations that apply only to the High Fire-Threat District.

Comment on Item 3: The Joint Electric Utilities believe electric utilities and communication infrastructure providers *do not* need Shape C to implement stricter High Fire-Threat District safety regulations. The Joint Electric Utilities have the capability to produce maps for internal use that denote the location of its overhead electric lines in relationship to Tiers 1, 2, and 3 following the production and adoption of Shape B as the final Fire Threat Map and to share those utility maps with communication infrastructure providers.

Item 4: Whether Shape C is needed by the Commission to enforce the stricter fire-safety regulations that apply only to the High Fire-Threat District.

Comment on Item 4: Shape C is not needed to implement or enforce stricter fire-safety regulations in the High Fire-Threat District. The Joint Electric Utilities have the capability to produce maps for internal use that denote the location of its overhead electric lines in relationship to Tiers 1, 2, and 3 following the production and adoption of Shape B as the final Fire Threat Map. Furthermore, even if an electric utility or communication company is unable to produce a similar map for their own service area, the delineation of the Tier 1, 2, and 3 boundaries should be of sufficient graphic detail to allow Commission staff to determine whether the facilities in question are in Tier 2 or Tier 3. For example, CAL FIRE has been successful using State Responsibility Area (SRA) maps without utility infrastructure displayed to enforce conductor-to-vegetation clearance requirements more strict than GO 95 Rule 35 for nearly 20 years. The Commission should see this application as a precedent to inform enforcement activities associated with Fire Map 2. Thus, the Joint Electric Utilities believe that with the

production and adoption of Shape B as the final Fire Threat Map, the Commission will be able to enforce the stricter fire-safety regulations that apply only to the High Fire-Threat District.

Item 5: Whether Shape C, by identifying the location of overhead electric utility circuits in high fire-threat areas, presents public safety and security issues.

Comment on Item 5: Identifying the location of overhead electric utility circuits in high fire-threat areas (even as simple geometric lines or buffered areas on the landscape) could present public safety and security issues if the Joint Electric Utilities and other electric utilities are required to denote transmission circuits, substations, and other critical infrastructure. Because the Joint Electric Utilities have the capability of producing maps for internal use or review by Commission staff that denote the location of overhead electric lines in relationship to Tiers 1, 2, and 3 following the production and adoption of Shape B as the final Fire Threat Map, the production of Shape C is unnecessary and may present security concerns.

Item 6: The revised schedule for the development of Fire Map 2, assuming that development is limited to Shape B (with no Shape C). This Ruling proposes the following schedule derived from D.17-01-009, Table 1, at pages 42-47:

Comment on Item 6: As noted above, D.17-01-009's Table 1, Row 11 includes important expert review, quality control, and communication steps between the Territory Leads, Peer Development Panel, and Independent Review Team for the proposed final Tier 2 and Tier 3 boundaries that rely in large part on the location of overhead electric utility lines. Thus, the Joint Electric Utilities believe the proposed 25-day reduction to the mapping development timetable would be detrimental to the quality and accuracy of the final Fire-Threat Map. In short, even if the Territory Leads and Peer Development Panel were able to incorporate the location of overhead electric lines into the deliberative process for establishing Tier 2 and Tier 3 boundaries, it is essential that the Independent Review Team and other experts (Peer Development Panel members and Territory Leads) have adequate time to understand the logic and decision making that influenced the proposed boundaries, which may include a confidential review of a utility's overhead infrastructure maps.

III.

CONCLUSION

For the above stated reasons, the Joint Electric Utilities believe D.17-01-009 should be modified so that the final map product is Shape B. The Commission should also recognize, however, that the time originally allotted for the development of Shape C will be needed to ensure the Tier 2 and Tier 3 boundaries in Shape B account for the location of electric utility overhead lines.

Respectfully submitted,

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