



**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)

**COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
IN RESPONSE TO ALJs' RULING**

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April 3, 2017

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On March 10, 2017 Administrative Law Judges Kenney and Kao issued a Ruling¹ inviting parties to submit written comments and reply comments regarding whether Decision (D.) 17-01-009 should be modified so that (1) the final map product is Shape B, and (2) the requirement to develop Shape C is deleted. SDG&E herein responds to the March 10, 2017 Ruling.

In brief, SDG&E has no opposition to the idea of eliminating the step of developing Shape C, but doesn't believe that the time assigned to the step can be eliminated – rather, we suggest using the time to add to the PDP's submission of Map 2 to the IRT. The Commission should keep the time allotted because that there is some work that would have been accomplished during the Shape C process that will still need to be incorporated into Shape B work.

As required by the Ruling, SDG&E's comments address the following matters:

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.*

SDG&E continues to urge the Commission to adopt a final Fire Map that can be utilized by the utilities of the State (and by the Commission itself) efficiently. A Fire Map that shifts Tiers in very small increments of land will be virtually impossible to operate under, or to enforce, and would increase errors. Regardless of whether or not there is a Shape C, a rational

¹ 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

map drawing process is needed is to avoid small absurdities in the Tier boundaries, which would require both utility operational staff and CPUC enforcement staff to constantly “watch the map” as they inspect circuits.

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).*

SDG&E believes that Shape C is not necessary for Fire Map 2; however some of the work that would have been accomplished during Shape C still needs to be completed, and will still consume time and mapping resources.

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.*

Shape C is not needed to implement fire safety regulations.

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.*

SDG&E believes that Shape C is not needed to enforce fire safety regulations.

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

The final Fire Map need not identify any security-related information regarding electric utility circuits in high fire threat areas.

6. *The revised schedule for the development of Fire Map 2, assuming that development is limited to Shape B (with no Shape C).*

The Ruling proposes a schedule derived from D.17-01-009, Table 1, at pages 42-47. That schedule is not copied into these comments. SDG&E supports an expedited schedule for adopting a final Fire Map 2. However, accuracy and usefulness should outweigh speed of adoption. The Map is expected to be in place for a decade so it needs to be both accurate and workable.

SDG&E appreciates the opportunity to comment on these questions from the ALJs' Ruling and looks forward to working with the Commission and its staff in this important proceeding.

Respectfully submitted,

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