



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

FILED

10-19-10

04:59 PM

Application of SAN DIEGO GAS & ELECTRIC)
COMPANY for Review of its Proactive De-)
Energization Measures and Approval of Proposed)
Tariff Revisions)
(U 902-E))
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Application No. 08-12-021

MOTION TO STRIKE OF SAN DIEGO GAS & ELECTRIC COMPANY

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October 19, 2010

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MOTION TO STRIKE OF SAN DIEGO GAS & ELECTRIC COMPANY

Pursuant to Rule 11.1 of the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (SDG&E) hereby moves to strike the response filed jointly by the Division of Ratepayer Advocates (DRA) and the Consumer Protection and Safety Division (CPSD) on October 8, 2010¹ in the above-entitled proceeding. This response by DRA and CPSD is improper in that it far exceeds the scope of the pleading to which it allegedly responds. For reasons set forth more fully below, the Commission should strike it in its entirety. Safety issues should be addressed by the Commission in an appropriate forum, i.e. a statewide proceeding in which all affected parties are afforded notice and an opportunity to be heard.

BACKGROUND

On September 7, 2010, Disability Rights Advocates (DisabRA) filed a petition to modify D. 09-09-030 (hereafter, PFM). DisabRA’s PFM asked the CPUC to modify its Sept. 9, 2009 decision denying SDG&E’s proactive Emergency Power Shut-Off (EPSO) Plan. In its PFM, DisabRA acknowledges the CPUC’s finding in the EPSO decision that SDG&E is statutorily obligated to shut-off power to protect public safety under certain conditions, but requests that this finding be modified to expressly provide that SDG&E must take “appropriate and feasible steps to warn and protect its customers” in the event of a

¹ JOINT RESPONSE OF THE CONSUMER PROTECTION AND SAFETY DIVISION AND THE DIVISION OF RATEPAYER ADVOCATES IN SUPPORT OF DISABILITY RIGHTS ADVOCATES’ PETITION FOR MODIFICATION OF DECISION 09-09-030.

statutory shut-off. The PFM asked the Commission to adopt certain language changes in the EPSO decision, all of which dealt with notice to customers and mitigation measures. The DisabRA PFM did not propose any changes to, or interpretations of SDG&E's statutory obligations, even though those obligations were addressed (but not specifically defined) in D. 09-09-030, pp. 61-62.

On October 8, 2010 DRA and CPSD jointly filed a response in support of the PFM. However, the DRA/CPSD response improperly addresses issues not raised in the PFM. For example, DRA/CPSD seek to modify (and have the CPUC proactively determine as invalid) SDG&E's interpretation of the conditions that would allow it to shut-off power under its statutory right/obligation.²

DRA/CPSD's Response Is Procedurally Improper

In Decision 09-09-030, the Commission confirmed that "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." The Commission further recognized that the Public Utilities Code imposes a public safety obligation on SDG&E, which includes the requirement to de-energize in order to protect public safety when weather conditions threaten system integrity (a "statutory shut-off" event). However, the CPUC did not attempt in that decision to elaborate the exact parameters of SDG&E's statutory obligation – and no party challenged this part of the decision by seeking rehearing.

DRA/CPSD's response also alleges that "In D.09-09-030, the Commission rejected SDG&E's arguments about its authority to shut off the power when wind gusts

² DRA/CPSD argue that SDG&E should not be allowed to shut off electric power when wind gusts reach 56 miles per hour. They claim that SDG&E contends that it has the authority to shut off the power, whenever wind gusts exceed 56 mph on its wood poles, without having any plans in place for contacting or mitigating the impacts of a power shut off to its customers in its affected areas. DRA/CPSD conclude that wind gusts exceeding 56 mph do not qualify as interruptible events per SDG&E's tariff. DRA/CPSD allege that, pursuant to the Commission's GO 95, SDG&E's wood poles must be designed to withstand wind gusts of at least 79 mph and more than 91 mph if the poles have both electric and communications facilities on them.

exceeded 56 mph...”. DRA/CPSD response, p.7. In fact, D.09-09-030 specifically *declined* to rule on the issue of wind speed and pole loading:

There is disagreement between SDG&E on the one hand, and CPSD, DRA, and the Alliance on the other hand, regarding how the wind-loading standards for power line facilities set forth in General Order 95 should be interpreted in terms of setting a threshold for shutting off power. Today’s decision does not resolve this dispute.

D.09-09-030, p. 62, footnote 64.

Now, DRA/CPSD improperly are attempting, through a response to a PFM that does not address this issue, to have the Commission decide exactly how SDG&E’s statutory obligations are defined, and to seek to overrule SDG&E’s engineering experts on matters of wind speed and pole loading³ although those were never even mentioned in the PFM.

Furthermore, DRA/CPSD overlook the long-standing fact that CPUC review of utility operations is by reasonableness review. This is reflected in D.09-09-030, which states that if SDG&E were to shut off power pursuant to its statutory obligations, “The Commission may decide at that time whether SDG&E’s decision to shut off power was reasonable and qualifies for an exemption from liability under Tariff Rule 14.” D.09-09-030, p. 62.

DRA/CPSD instead seek to have the CPUC determine in advance of any such yet-to-occur operations, that *if they occur in the future* that they should be considered to be grounds to institute a contempt proceeding at the CPUC.⁴ There is no precedent for such a request, and none is cited by DRA/CPSD.

Notably, neither DRA nor CPSD asked the Commission to clarify or modify D.09-09-030 either through an application for rehearing, or by their own petition to modify the decision. The present collateral attack on D.09-09-030 is unjustified and, if allowed, would modify a decision in a manner that would affect all other California utilities, by

³ SDG&E’s engineers reviewed the DRA/CPSD Response, and have both contributed to and reviewed this Motion for accuracy on all technical matters. Under Rule 11.1 Motions are not required to be verified.

⁴ DRA/CPSD argue that SDG&E’s shut-off of electric power would be in direct contravention of three Commission orders and, therefore, should result in the institution of contempt proceedings if SDG&E proceeds with its “threats”.

way of setting precedent. The CPUC cannot interpret both the Public Utilities Code and General Order 95⁵ in the manner suggested by DRA/CPSD without affecting Southern California Edison (SCE), Pacific Gas & Electric (PG&E), PacifiCorp, and numerous other entities. However, that would be the inevitable outcome of granting the relief sought by DRA/CPSD. SDG&E urges the Commission to address important safety issues in a uniform manner statewide. These critical matters should not (and in fairness to other affected parties cannot) be decided in a one-utility proceeding.

DRA/CPSD's Response Could Negatively Affect SDG&E Operations If Granted

The relief sought in DRA/CPSD's response is not only improper, it could result in decreased public safety. DRA/CPSD concede that power could be shut off if there already is a fire, but otherwise argue that any shut offs at 56 mph should result in contempt proceedings.⁶ It appears that DRA/CPSD have not considered the implications of their position on actual operations. If the wind speed is 56 mph and a lineman sees tree branches being blown through the air, near (but not into) power lines, SDG&E must do nothing, or risk a contempt proceeding. DRA/CPSD's position would mean that SDG&E must wait until there is an actual fire, not just the imminent likelihood thereof, before it shuts off power. Suppose that lineman sees broken branches being blown between the energized lines -- but not actually igniting yet. Unless the wind speed increases dramatically, and/or actual flames are seen, no shutoff should occur. DRA/CPSD's position seems to increase (rather than decrease) the likelihood that there would be a repeat of the 2007 wildfires in San Diego that resulted in 1500 homes burned, over a billion dollars in damage, and thousands of lives affected. These positions call into question their commitment to the safety of San Diego County.⁷

⁵ DRA/CPSD spend considerable paper in their filing addressing their interpretations of the design limits from General Order 95 and how they differ from SDG&E's interpretations and calculations.

⁶ DRA/CPSD response, p. 2, note 1.

⁷ DRA/CPSD's position also directly conflicts with any goal of providing notice to customers prior to any shut off. To the extent that shut offs may only occur once a fire is already present, the time available for providing any form of notice is essentially gone.

Public safety is SDG&E's priority in the operation of its electrical system, especially during extreme weather conditions. SDG&E has taken a number of steps to harden its system, stage crews during Red Flag Warnings and turn off recloser switches during elevated fire-risk conditions. These steps reduce, but do not eliminate, the risk of another catastrophic wildfire. Should Santa Ana winds exceed SDG&E's system design limits, or crews observe hazards in the field, SDG&E may need to temporarily shut off power to protect public safety until conditions are safe. SDG&E has emergency protocols in place and will provide notifications and updates to first responders, County Office of Emergency Services and our customers during these critical times.

D. 09-09-030 clarified SDG&E's statutory obligation to shut off power for public safety and specifically stated

“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 into tinder-dry brush.”

D.09-09-030, pp. 61-62.

SDG&E's wood pole system has been designed and built to withstand winds of 56 miles per hour, in compliance with the state standards that also apply to SCE and PG&E.

SDG&E disagrees with DRA and CPSD when it comes to their interpretation of the purpose for safety factors. When poles are designed for a maximum allowable working load, safety factors are applied on top of that load to determine a suitable structure for the design. It is a safety factor to ensure the structures can reliably withstand the load that was used for the design. To then argue (as DRA and CPSD do) that it is alright to knowingly load something to a higher level because of the safety factor/margin is a misapplication of the concept of safety factor. Relying on safety factors in allowing facilities to be loaded above the loading level for which those facilities were designed is not done as a matter of practice in other industries⁸ and should not be done for structures supporting energized electrical lines.

⁸ For example, buildings, automobiles, commercial airliners, and cranes should not be knowingly loaded beyond the maximum allowable working load.

Accordingly, DRA/CPSD's claims are unfounded. DRA and CPSD are risking public safety and future wildfires by claiming that these systems can in theory withstand winds that in reality they were not designed to withstand. DRA and CPSD cite G.O. 95, Rule 48, but ignore the fact that Rule 48.1 (in General Order 95) specifies average strengths for wood poles, which means 50% are stronger than those values and 50% are weaker.⁹ DRA and CPSD continue to incorrectly apply the concept of safety factors, and ignore the probabilities of failure associated with facilities designed to meet General Order 95, Section IV, criteria. General Order 95 requires that poles be designed and constructed for a specified load. The safety factor is then applied to ensure that the pole can in fact withstand these loads in a real world environment and based on the material properties of the structure, with a minimal probability of failure. However it is not accepted practice, nor is it reasonable to assume that because of the safety factor, the pole can be routinely loaded to higher levels than the original design, without negatively impacting safety. It is also irrational to argue that electric utility systems should knowingly be operated to within a hair's breadth of their failure point, before safety precautions are taken.

DRA/CPSD also overlook their own statements that other parts of the overhead system may fail at wind speeds lower than what they now claim SDG&E's system should withstand. For instance, in Joint Reply Comments of the CPSD and DRA to SDG&E's response to ALJ Kenney's Ruling (filed 05/26/09), DRA/CPSD stated:

In addition, Conductor Fastenings (fastenings that hold the conductors to the insulators or hold two conductors together) are required to have a safety factor of 2 at the time of construction and must be replaced if the safety factor reaches 2/3 of 2 (i.e., 1 and 1/3), which means that a conductor fastening must be able to withstand a force of 10.6 lbs per square foot or a wind speed of 65 mph.

In other words, DRA/CPSD have already acknowledged the fact that the design wind speed for certain components of the power lines are lower than 79 mph, such as Conductor Fastenings identified by CPSD with a wind speed limit of 65 mph. Therefore, even applying CPSD's incorrect reasoning with regard to wood poles, there are elements

⁹ In the Safety OIR workshops, this issue was pointed out and the probabilities of failure at various wind speeds, for wood poles designed per GO 95, were presented to CPSD. As demonstrated in those workshops the probability of failure for a fully loaded, deteriorated wood pole, built with Grade B construction, is 50% at a wind speed of 79 mph.

of overhead power line facilities that could have a safety factor of 1.0 after the 1/3 allowable reduction that have a wind design limit of 56 mph. An overhead electric system is only as strong as its weakest element. 56 mph should be the operating limit.

Importantly, the safety factor does not change the maximum working stress of 8 pounds per square foot (56 mph); rather, it accounts for several variables, including deviations in construction, material variation, deterioration, uncertainties with loads, and other external factors. Facilities, whether power lines or mountain-climbing gear, should never be operated at or near the breaking point; that is the reason for using safety factors, to allow for unknown factors or deterioration that could jeopardize safety. Facilities should only consistently be operated up to their maximum working stress level, with the safety factor in place to allow a margin of safety. The argument by DRA and CPSD, that facilities should be able to be safely operated well beyond their maximum working stress level based on safety factors, defies both textbook and industry standard concepts of maximum working stress and safety factors.

In addition to applying safety factors correctly when designing its system, SDG&E has made tremendous strides in strengthening its overhead electric system using new materials and technology. However, no system can be “fire-proofed” or built to prevent 100% of power outages or built with zero probability of failure. Power outages happen frequently due to various causes including Mylar balloons, palm fronds or other vegetation blowing through the air and getting into power lines, cars hitting power poles, or animals or birds contacting energized equipment. SDG&E has procedures in place to notify customers in the high fire risk areas – if possible under the circumstances – when weather conditions threaten the electrical system or public safety.¹⁰

¹⁰ SDG&E has also developed a web site that customers can use to track the conditions in their neighborhood in real time.

CONCLUSION

Given that

- 1) DRA/CPSD have not previously sought any changes to D.09-09-030 by application for rehearing or PFM ;
- 2) DRA/CPSD seeks to change D.09-09-030's treatment of statutory interpretation, as well as address issues not specifically decided in that decision at all, including wind speed or pole loading issues;
- 3) the DRA/CPSD response clearly exceeds the scope of the PFM both in relief sought and in issues addressed ;
- 4) the DRA/CPSD response raises issues of statutory interpretation and interpretation of GO 95 that would affect all electric utilities in California; and
- 5) not all California electric utilities are parties to the instant proceeding, and thus would have no notice of issues affecting their interests should the Commission address them here;

The Commission must in the interests of fairness and due process strike the response of DRA/CPSD.

Respectfully submitted,

By: /s/ Keith W. Melville

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October 19, 2010

CERTIFICATE OF SERVICE

I hereby certify that a copy of the **MOTION TO STRIKE OF SAN DIEGO GAS & ELECTRIC COMPANY** has been electronically mailed to each party of record of the service list in A.08-12-021. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and by depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to the Administrative Law Judge and Commissioner in this proceeding.

Executed this 19th day of October, 2010 at San Diego, California.

/s/ LISA FUCCI-ORTIZ

Lisa Fucci-Ortiz



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