

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



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Application No. 09-08-020
(Filed August 31, 2009)

Application of San Diego Gas & Electric Company (U 902-M), Southern California Edison Company (U 338-E), Southern California Gas Company (U 904-G) and Pacific Gas and Electric Company (U 39-M) for Authority to Establish a Wildfire Expense Balancing Account to Record for Future Recovery Wildfire-Related Costs

MUSSEY GRADE ROAD ALLIANCE PROTEST

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MUSSEY GRADE ROAD ALLIANCE PROTEST

I. INTRODUCTION

Pursuant to Rule 2.6 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, the Mussey Grade Road Alliance ("Alliance") files this protest objecting to the Application of San Diego Gas & Electric Company (U 902-M), Southern California Edison Company (U 338-E), Southern California Gas Company (U 904-G) and Pacific Gas and Electric Company (U 39-M) for Authority to Establish a Wildfire Expense Balancing Account to Record for Future Recovery Wildfire-Related Cost.¹

The Alliance is a non-profit, grass roots, community-based advocacy organization dedicated to the preservation and protection of Mussey Grade Road and environs in Ramona, California. We are deeply concerned about wildland fire issues as they affect our community and environment, and have contributed expert testimony, comment and argument on the topic of wildland fire and power lines in Commission proceedings A.06-08-010, R.08-11-005 and A.08-12-021.

The Alliance believes that this application, if approved, would create a *disincentive* state-wide for safe and reliable operation of the power grid by shielding the utility applicants from the consequences of insufficient capital investment in their on-the-ground infrastructure, including regular maintenance. The application also makes bold and incorrect assertions about the causes of wildland fire. These assertions need to be challenged and corrected.

The current application awards a competitive advantage to utilities that minimize their capital infrastructure investment and safety improvements while, at the same time shifts the cost burden of wildland fire ignitions caused by utility infrastructure to California ratepayers.

By painting themselves as victims of uncontrollable circumstances, the applicants hope to remove from themselves the consequences for insufficient investment in safe utility infrastructure.

¹ A.09-08-020; JOINT APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M), SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), SOUTHERN CALIFORNIA GAS COMPANY (U 904-G), AND PACIFIC GAS AND ELECTRIC COMPANY (U 39-M); August 31, 2009; ("Application").

They aspire to accomplish this through the establishment of a rate-based account to pay for uninsured costs as a result of wildland fires ignited by their own equipment. In doing this, the “Big Three” utilities in California have declared war on wildland fire at the expense of ratepayers.

In effect, they are asking us, the ratepayers, to reimburse them for their lack of due diligence in the safe construction and maintenance of their electricity transmission and distribution infrastructure. This is tantamount to saying that they are not responsible for what happens to the communities and customers they serve vis a vis wildland fire ignitions caused by their equipment.

Ultimately, the application asks the Commission to collude with the applicants in their state of victimhood and to bless their refusal to take responsibility for the safe provision of electricity under Commission rules and regulations to protect their customers. Moreover, the Commission is being asked to assist the applicants, who under this application would not be held financially accountable for their actions or lack thereof, at the expense of the overall public good. The Alliance therefore requests that the application be denied.

II. BACKGROUND

In October 2007, Southern California was hit by what could be described as a “power line firestorm”, as nearly half of the approximately 20 fires during that time are claimed to have been ignited by power lines.² The largest of these, the Witch Fire, was responsible for the destruction of 1,650 structures.³ According to the testimony provided by the applicants, SDG&E alone faces \$1.6 billion in liability claims due to the 2007 fires.⁴ Additionally, the theory of inverse condemnation, which allows the collection of multiple damages without requiring negligence, means utilities and insurers have now realized that power line fires ignited by utility equipment have serious

² Mitchell, Joseph W.; “Power Lines and Catastrophic Wildland Fire in Southern California”; Presentation to the Fire & Materials 2009 Conference, San Francisco CA, Jan 26, 2009 (Mitchell, 2009)
http://www.mbartek.com/FM09_JWM_PLFires_1.0fc.pdf

³ Cal Fire; Fact Sheets; 20 Largest California Wildland Fires; (by Structures Destroyed);
http://www.fire.ca.gov/communications/downloads/fact_sheets/20LSTRUCTURES.pdf

⁴ A.09-08-020; TESTIMONY IN SUPPORT OF JOINT APPLICATION FOR AUTHORITY TO ESTABLISH A WILDFIRE EXPENSE BALANCING ACCOUNT TO RECORD FOR FUTURE RECOVERY WILDFIRE-RELATED COSTS; August 31, 2009; (“Applicant Testimony”).

consequences on profits for both industries. This late realization on the part of the electrical utility industry in California is at the heart of this application.⁵

The solution for the Big Three is to make the ratepayers pay – that is absorb the uninsured costs of SDG&E, SCE and PG&E for wildland fire events. This application, arguing as it does that the utilities are no longer able to obtain sufficient liability insurance at reasonable rates, requests that “Applicants propose to finance uninsured costs as they are incurred and *subsequently recover the costs in rates.*”⁶ (Emphasis added) Under this scheme the utilities would pass on the cost to customers of their own infrastructure safety insufficiencies by requiring their ratepayers to absorb not only the shock of wildland fires caused by their equipment, including inevitable deaths and massive destruction that wind-driven power line fires are known for, but also to subsidize the applicants’ profit margins by raising their customers’ electricity rates.

Because the Alliance foresaw this as a likely development during the Sunrise Powerlink application A.06-08-021, we argued among other things that:

1. Inverse condemnation could greatly increase utility exposure to liability losses and thereby increase cost to the utilities for catastrophic fires.⁷
2. “If it becomes widely known that power line fires are the cause of catastrophic fires due to the mechanism detailed in this brief, and if such fires occur either inside or outside of the SDG&E service area, then it is only a matter of time before insurers take note, and it would be unlikely that SDG&E could continue to obtain insurance on its present terms.”⁸
3. Utilities would seek to find a mechanism to pass these costs onto consumers.⁹

⁵ The Alliance had brought the issue of increasing insurance costs and even the lack of available insurance to the Commission’s attention in A.06008-010, Sunrise Powerlink proceedings.

⁶ Application; p. 2.

⁷ A.06-08-010; MGRA Phase 1 Direct Testimony, Appendix H – COSTS; May 31, 2007; p. 8. Note that this is prior to the October 2007 firestorm. Available at: http://www.mbartek.com/cpucspl/MGRA_Mbar_SPL_AppH_Costs.pdf (A.06-08-010 Alliance Testimony, Appendix H)

⁸ A.06-08-010; OPENING BRIEF OF THE MUSSEY GRADE ROAD ALLIANCE ON PHASE I ISSUES OF THE SUNRISE POWERLINK TRANSMISSION PROJECT; November 7, 2007; p. 28.

⁹ Ibid.

III. ISSUES

A. Power Line Fires are Not Just Natural Phenomena

One of the most problematic aspects of this application is the way in which *power line fires* are described as capricious natural phenomena over which the utilities have no control:

*“...rate recovery of the uninsured costs of wildfires parallels the rate treatment of the costs of other natural disasters, such as earthquakes, tornados, or major storms. Like these other natural disasters, fire damage is unpredictable. Fires that start similarly can lead to vastly different results because of factors having nothing to do with the initial ignition. Factors beyond the Utilities’ control, such as weather, geography, demography, and local fire fighting resources determine whether any particular fire will turn into a disaster.”*¹⁰

In fact, research has shown that to a large extent the current wildland fire problem is very much a human issue, arising from the increased number of people and equipment (including power lines) in areas where fires start, and of homes built in the wildland urban interface. The number of fires has increased along with the population living in these settled areas. The more people, the more sources of ignition: from equipment, from vehicles, from arson – and, most importantly for the Commission’s consideration of this application, from power lines.

The size of wildland fire losses – the total losses insurers are exposed to for the purposes of this application – are a function of the *size* and the *frequency* of wildland fires caused by power lines. However, the application attempts to conflate *all fires with fires ignited by power lines*. It also seeks to conflate *total losses* with *size* of the fire – ignoring the fact that utilities *do* have control over whether power line fires are ignited by their power lines, such as in this assertion:

*“Wildfires are inevitable. Like other natural disasters, the magnitude of damage depends on factors outside the Utilities’ control, such as weather, demography, and local fire fighting capabilities.”*¹¹

¹⁰ Application; p. 4.

¹¹ Applicant Testimony; p. 1.

The fact that utilities have significant control over the *number* of power line fires is ignored because it does not serve the interest of the applicants. Also ignored is the fact that power line fires are larger and more destructive than fires arising from other sources:

“The fires’ sources bear no discernable relationship to the extent of damages. For example, of the fires associated with power lines, the Sedgwick fire burned only 700 acres and destroyed no structures while the Witch fire destroyed over 1,500 structures and covered nearly 200,000 acres, underscoring fire’s capricious nature.”¹²

This argument from anecdote ignores the fact that while power line fires constitute only a small fraction of fires, they are responsible for an inordinate share of losses. The Alliance has submitted to the Commission academic work published by its fire expert¹³ demonstrating that in Southern California power line fires were responsible for 4 of the 20 largest fires in California history. The paper also shows that power line fires are much larger, on the average, than fires arising from other sources. This is true because, while the exact source of ignition may not have an effect on the extent of a fire, the *timing* of the ignition does – and power line fires tend to ignite under high wind conditions that stress utility infrastructure. The utilities understand this ignition mechanism, but this application argues that they have little control over it:

“The high winds that can transform a small fire into a fire storm also increase the likelihood that trees or vegetation will blow into power lines, as well as the potential that poles or wires may fail under the strain irrespective of compliance with applicable installation and inspection rules.”¹⁴

The applicants seem to be arguing throughout this application that the number of accidents causing power line fires have little relationship to the rigor (and cost) applied to the engineering and maintenance of their infrastructure – which is plainly absurd. Components engineered and maintained to higher standards will fail less frequently than those not as well engineered or maintained and will be responsible for lesser overall losses.

¹² Applicant Testimony; p. 10.

¹³ 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)

¹⁴ Applicant Testimony; p. 9.

The applicants also appeal to disaster responses in other states to set a precedent for their proposed rate increase:

“Just as the Commission has authorized recovery of costs of natural disasters, and just as the Florida Commission and Legislature authorized Florida utilities to recover costs resulting from hurricanes after insurers withdrew from that market, so too should the Commission authorize the Utilities to recover the costs resulting from wildfires that can no longer be insured at a reasonable cost.”¹⁵

To our knowledge, no one has accused Florida Power and Light of being responsible either for starting hurricanes or for hurricane damage. Our utilities, however, *are and have been* responsible for fire damages resulting from fires ignited by their infrastructure. This being so, the Commission has much more extensive regulatory responsibilities than would be the case if power line fires were outside of utility control.

B. Utilities can Reduce Exposure by Investing in Infrastructure

Rulemaking proceeding R.08-11-005, in which the Alliance is a participant, is aimed at making the GO 95 and other General Orders more effective in addressing the power line fire problem. The applicants agree that this process is likely to reduce long-term fire risks.

“A recent decision in Phase I of that proceeding contains new vegetation management rules with implementation to begin before the fall. Phase II will address longer-term actions to further reduce wildfire risks. While these actions can help over the long run, none of them can eliminate the risk of a catastrophic fire, nor can they resolve the possibility that wildfire claims will greatly exceed available insurance.”¹⁶

In addition to changes to the standards, there is nothing that prevents utilities from taking the initiative to implement their own programs to reduce fire hazards. For instance in A.08-12-021, SDG&E touted a program to replace wooden poles with steel poles. The Alliance noted that at the

¹⁵ Application; p. 4.

¹⁶ Applicant Testimony; p. 5.

rate specified in the application, it would take over 70 years for SDG&E to complete this program.¹⁷ This timeline hardly seems either adequate, or sincere, in terms of the prevention of wildland fires by SDG&E equipment. Nevertheless, other infrastructure capital improvements, vigorously carried out by the utilities, would be likely to reduce fire risk, quite possibly to the point where insurers would be willing to remain in or re-enter the California utility insurance market.

What is at question in this application is really the *cost* of reducing the risk:

*“Supplying customers with gas or electricity brings with it an inherent risk of fire. The Utilities can and do take measures to reduce this risk, but they cannot eliminate it. Measures to mitigate the risk of fires have limits.”*¹⁸

*“The Utilities take operational and design steps to mitigate wildfire risks, but attempts to completely eliminate those risks would be cost prohibitive and ultimately futile.”*¹⁹

A comment we hear often in the San Diego back-country is “*Why don’t they just bury all the lines?*” This is an example of a measure that would virtually eliminate the risk of power line wildfires by removing the utility infrastructure from both fuels and hazardous wind conditions. That it hasn’t been carried out to a greater extent already comes down to one fact – it is expensive. Ask ratepayers to cover this cost, the utilities argue, and they will balk. And yet, the utilities are now asking the same ratepayers to potentially foot billions of dollars of future potential liability costs. We need to ask to what extent these potential liability costs can be eliminated by infrastructure improvements, and whether this is a better way to spend the public’s money.

The wildland fires in California over the past decade have reset expectations for the future. The insurers have already picked up on this reality-shift, and it is time for the utilities, the Commission and the public also to realize that the old ways of thinking are no longer appropriate. For example, the utilities, the Commission, and the public previously believed that California’s utility infrastructure presented no great potential harm to the public, and that the safety measures currently in place are adequate. We have learned by bitter experience that utility infrastructure does present great potential harm and that current safety measures taken by utilities are not adequate.

¹⁷ A.08-12-021; MGRA Opening Comments; March 27, 2009; Appendix B; SDG&E Response to MGRA Data Request #1, part 1. Feb. 24, 2009. MGRA-6, MGRA-8.

¹⁸ Applicant Testimony; p. 14.

¹⁹ Applicant Testimony; p. 16.

In viewing this application, the Commission, on behalf of the public, needs to determine how the risks and costs of power line fires are to be best managed. Up to now, the Commission has let the utilities determine how best to balance infrastructure improvements and insurance coverage to cover risks. Since the Commission is now being asked to get involved in the insurance business, it is incumbent on the Commission to regulate the balancing of risk management measures in order to ensure that the overall risks and costs to the public are minimized. This is particularly important in light of the present application, which seeks to balance the costs against the interests of the ratepayer and in favor of the applicants irrespective of the responsibilities incurred by the applicants under the Commission rules and regulations governing the provision of electrical power.

C. The Most Destructive Power Line Fires have been Linked to Utility Violations

The application argues that the theory of inverse condemnation would allow utilities to potentially be held liable for power line fire damage even if they are in compliance with all rules:

“...a California Court of Appeal ruling currently being cited by plaintiffs’ lawyers increases the potential for sizeable wildfire damage payouts based on the theory of inverse condemnation.

Insurers fear that this theory imposes strict liability on the utilities, making them responsible for property damage from any fire associated with utility equipment, even if there is no proof of utility negligence.”²⁰

While the inverse condemnation theory has been used in the case of large wildland fires ignited by utility equipment, in practice the major fires that have led to losses and so alarmed the insurance industry are all cases where regulators have asserted that the utilities were somehow negligent in the performance of their duties. For example, the Witch Fire, responsible for \$1.6 billion in damages and the largest power line fire in California, is the subject of CPUC investigation I. 08-11-006, as is the Rice Fire, which was the 19th largest fire in terms of structure loss in California history.²¹ It would be fair to say that by dominating the statistics of power line fire

²⁰ Applicant Testimony; p. 4.

²¹ Loss numbers valid as of 2008. Cal Fire; Fact Sheets; 20 Largest California Wildland Fires; (by Structures Destroyed); http://www.fire.ca.gov/communications/downloads/fact_sheets/20LSTRUCTURES.pdf

losses to date, these two fires are responsible for the current re-evaluation of risk by the insurance industry.

In its initial report, the Consumer Protection and Safety Division found SDG&E at fault for these two fires.²² The Slide fire, the 18th largest in 2008, was also under investigation as a power line fire. So while a utility might theoretically have no violations or issues and still have its lines ignite a damaging fire, the catastrophic utility fires to date that resulted in the most significant losses have been tied to operational or compliance failures.

D. Blanket Shielding of Utilities From Liability Creates Disincentive for Safe Operation

It is the Commission's mandate to ensure that utilities comply with provisions of the Public Utilities Code that require safe and cost efficient operation.²³ Considerable leeway, though, is given to the utilities in how best to manage their networks to balance between safety and cost effectiveness, so long as safety codes are followed.²⁴

The Alliance maintains that while utilities might value safety, practically they profit from controlling costs. Costs of wildland fires ignited by power lines would, ideally, be one set of costs the utility industry would seek to control – either in terms of capital investment in infrastructure or in terms of covering fire-related costs through insurance. However, the desire of prudent utility management to reduce costs would miraculously be satisfied if those costs could be shifted away from the industry onto the end customer. In this scenario, the desire to reduce power line fire costs through justified increases in spending on safety measures would disappear.

In the scheme suggested by the application, ratepayers would be protected by the Commission only in terms of enforcement of safety rules *after the fact of a powerline fire*. Regardless of whatever fines the Commission may decide in any particular case to levy against a

²² CPSD; REPORT OF THE CONSUMER PROTECTION AND SAFETY DIVISION REGARDING THE GUEJITO, WITCH AND RICE FIRES; Sept. 2, 2008.

²³ California Public Utilities Code; Sections 451 and 399.2.

²⁴ Public Utilities Code Section 399.2(a) (2) states “each electrical corporation shall continue to be responsible for operating its own electric distribution grid including, but not limited to, owning, controlling, operating, managing, maintaining, planning, engineering, designing, and constructing its own electric distribution grid, emergency response and restoration, service connections, service turnons and turnoffs, and service inquiries relating to the operation of its electric distribution grid, subject to the commission's authority.”

utility's unsafe operation vis a vis wildland fire ignitions by that utility, the applicants have argued in this application that that fully and completely enforcing safety regulations to eliminate violations is beyond the scope of both the utilities and the Commission:

“Instead, the Commission focuses on utility knowledge and opportunity to cure, so that the Utilities have ‘an incentive to engage in maximally effective preventive maintenance.’ The Commission has also acknowledged that a utility ‘cannot maintain its distribution system so that there are no GO 95 and 128 violations at a given time.’”²⁵

Therefore, should this application be granted, the company that is able to cut back on safety measures, in the name of “cost-efficiency”, is going to have a competitive advantage over a company that decides to spend more on safety measures. Until now, a company able to show that it operates more safely would be able to obtain insurance at better terms, offsetting the additional safety costs. This is even truer if utilities are directly exposed to the consequences of unsafe operations.

The Commission should not set up a dynamic in which unsafe operations are divorced from significant financial consequences. The market has played a role in utility regulation up to now in terms of the balancing of infrastructure outlays versus insurance costs. If the role the market plays is changed, the Commission must ensure that it does not create a new system with an inherent bias against increased investment in safety.

E. Insurance Plays an Important Regulatory Role

1. Insurers have a strong interest in preventing losses

The application contains much illuminating discussion of the details of utility insurance. The mechanism by which safe operation is rewarded through lower premiums and accidents are penalized by higher premiums is clearly explained:

“It is a common insurance industry practice for insurers to raise premiums on insureds that cause them losses. Just as an individual may see his or her auto insurance rates go up after the

²⁵ Applicant Testimony; p. 17.

insurance carrier pays for an accident, commercial insureds, like SDG&E and SoCalGas, are subject to the same “pay back” through higher premiums.”²⁶

So it is clearly in a utility’s financial interest to reduce premium costs, and one way to do this is to increase safety so that the chance of accident is reduced. No such feedback mechanism would be in place if the socialized insurance model of the application is put into place. There would be no increase in utility costs should safety conditions deteriorate and an increased number of fires were to occur as a result. In fact, under the scheme outlined in this application utilities could reduce the overall amount spent on safety measures without having any commensurate penalty. Allowing cost recovery in the manner requested by this application would therefore jeopardize public safety more than coverage by liability insurance does.

2. Until now, insurers have underestimated power line fire risks

The application states that:

“The wildfires that occurred in 2007 have altered the insurance industry’s perception of the chances that they may have to pay more such claims in the future.”²⁷

The Alliance agrees that the estimation of power line wildland fire risk by many insurers and by the utilities was incorrect prior to the October 2007 fires. The Alliance has presented testimony regarding the nature and sizes of wildland fires,²⁸ and its fire expert has published in this area.²⁹ As noted in the Alliance testimony,³⁰ wildland fire losses tend to follow a ‘power law’ size distribution, with very rare, extreme events contributing most of the historical losses. From an actuarial standpoint, this means that using average historical losses of all wildland fires to estimate future damages of catastrophic power line ignited wildland fires will lead to gross underestimation of the real risk. Instead, the maximum loss (weighted for its low probability) must be used for estimating expected losses. Insurers previously in the California utility market have now realized that their risk estimations were incorrect (as the Alliance argued that they would in its testimony in

²⁶ Applicant Testimony; p. 56.

²⁷ Applicant Testimony; p. 51.

²⁸ A.06-08-010 Alliance Testimony, Appendix H.

²⁹ Mitchell, 2009.

³⁰ Op. Cite; p. 7.

A.06-08-010), and therefore electrical utility insurance is becoming much more expensive or unavailable:

*“Unfortunately, the insurance carriers are no longer making an adequate level of insurance available on reasonable terms.”*³¹

*“The primary cause of this situation is the liability insurance markets’ response to the prospect of paying large claims arising out of wildfires in recent years... if large wildfires should occur in the future that are alleged to involve electric or gas utilities, it will become increasingly difficult – perhaps impossible – for California utilities to find insurers willing to provide coverage for this type of loss.”*³²

Of course, some insurer flight might be reactive panic, as well. As insurers do a more detailed analysis, it is possible that they may be able to create offerings that fit the needs of the California utilities and which reasonably estimate current risks.

3. Setting up cost recovery prevents development of new insurance products by the private sector

If a state-sanctioned, ratepayer-based supplemental insurance scheme as outlined in the application is approved and which offers essentially the same coverage as commercial insurance for free, insurance companies will not bother to re-enter the California utility market or create new products. The utilities claim that they would continue to rely on insurance even if they had a cost recovery program:

*“The Utilities will continue to rely on insurance to the extent it can be obtained at a reasonable price...”*³³

However, the presence of a cost-recovery program would re-define what would be considered a “reasonable price”. Why would a utility consider *any* price reasonable if it could get be subsidized by ratepayers for the same coverage and for no cost? It is unreasonable to expect that

³¹ Applicant Testimony; pp. 17-18.

³² Applicant Testimony; p. 42.

³³ Applicant Testimony; pp. 12-13.

insurers will be able to offer any products that would be able to compete with the rate-based cost recovery program if this program is put into place.

4. Removal of private insurance role requires increased regulatory oversight

Without having to show good behavior in order obtain a variety of insurance offerings or favorable premiums, or at worst to cover potential losses themselves, the utilities would be removed from the self-regulatory aspects of the market. All regulation of utility safety and fire prevention would then devolve onto the Commission. The applicants favor this outcome:

*“The Commission already has in place a process for investigating possible violations of General Orders, thus providing the oversight of utility diligence with respect to the safety of their facilities. The mechanism for recovering costs arising from wildfires should be separate from that investigative process.”*³⁴

If the utility customers are assigned the role of primary insurance carrier for the utility applicants, they would need to be backstopped by the Commission expanding its oversight and enforcement roles. The Commission has realized in the creation of Rulemaking R.08-11-005 that we have entered a new phase in which it is now realized that the public is inadequately protected from catastrophic power line fire by the current utility safety measures and Commission enforcement. Adequately protecting the public charged in this application with subsidizing the applicant utilities, would require that the Commission increase staffing, conduct more inspections, initiate more investigations into the cause of power line fires, and levy larger penalties for non-compliance of Commission’s rules and regulations.

All of this would cost California ratepayers more money to fund additional Commission staff to carry out the work to protect the public when utilities are not required, under this application, to cover their own costs of operation e.g. covering uninsured liabilities incurred through power line ignited wildland fires. Additionally, the non-compliance fines following investigations would need to be large enough to counter the competitive advantage inherent in the decreasing, rather than increasing of safety measures by the applicants. Not unexpectedly, the applicants argue that these penalties should not be tied to the amount of damages that fires cause:

³⁴ Applicant Testimony; p. 18.

*“The purpose of penalties, by contrast, is to punish past violations that were within the utility’s control to prevent and to deter future noncompliant behavior by utilities. The amount of the penalty should not be calibrated to the magnitude of fire damage, which is not within the utility’s control.”*³⁵

This reasoning is incorrect. Over long periods of time, a utility that ignites more power line fires would be expected to have greater cumulative liability than a utility which has a lower rate of power line fires. In this regard, individual utility companies have the capability and responsibility to control overall losses by reducing the **number** of fires ignited by their infrastructure, regardless of the fact that they may have little control over the growth of any particular fire due to the high winds that often accompany power line ignitions. Providing them with blanket liability coverage through a cost-recovery scheme would provide no incentive for them to improve their behavior in terms of capital investment in infrastructure or other actions to reduce the chances of power line fires.

F. If Financial Integrity of Utilities is an Issue, Safer Utilities Should be Rewarded

The applicants argue that large potential liabilities could undermine the financial integrity of the utilities:

*“Uncertainty about the Utilities’ ability to obtain full recovery of wildfire costs could undermine third-party confidence in California’s regulatory regime and the ability of the Utilities to withstand the cost of a catastrophic fire should one occur.”*³⁶

The Alliance takes no position at this time as to whether a catastrophic fire event would financially endanger a utility, or to what extent the Commission has a responsibility to protect utilities from such an event. However, common sense tells us that if you are in danger of going bankrupt due to a particular event or cause, it is important to take responsibility *to reduce the chances of that event or cause*. SDG&E, SCE and PG&E evidently believe that the ratepayer is the font of all solutions. Rather than outline serious measures to reduce power line fires, the applicants

³⁵ Applicant Testimony; p. 19.

³⁶ Applicant Testimony; p. 16.

have decided to throw the dice by demanding that the ratepayers, through the Commission, solve their problem. As the applicants have eschewed all responsibility for the creation of the problem, so have they eschewed all responsibility for the solving of the problem, separately from asking the Commission to make someone else pay.

1. The Alliance reserves comment in the case where liability is not due to violations or negligence

The applicants have argued that the doctrine of inverse condemnation might allow them to be held responsible for damages even in the case that they are not at fault. The Alliance takes no position at this time as to the truth of this statement. However, we will show that this is a theoretical point, as the cases so far resulting in substantial losses have been alleged by regulators to be due to non-compliance with standards. While we have no objections in principle to shielding utilities in cases where they accrue liability through no fault of their own, the Alliance takes no position as to whether this application presents an appropriate remedy on this point and reserves further comment at this time.

2. If financial integrity of utilities would not be threatened by a catastrophic fire event, they should bear the burden of losses for which they are responsible

The applicants argue strongly that the financial integrity of utilities could be threatened if a catastrophic fire occurs and they lack sufficient insurance coverage:

“Large uninsured wildfire claims could threaten the Utilities’ financial integrity, contrary to the public interest.”³⁷

“Significant uncompensated costs could threaten the Utilities’ financial ability to provide reliable service, contrary to the Commission’s policies in support of the Utilities’ financial creditworthiness.”³⁸

The Alliance is unfamiliar with the details of the utility finances, and so takes no position as to whether these are correct claims. If they are not, the Alliance would argue that this application

³⁷ Applicant Testimony; p. 1.

³⁸ Applicant Testimony; p. 7.

should be denied in the case where utilities are responsible for fires, and that the self-regulatory mechanism of potential liability be used to increase utility spending on fire-preparedness.

3. If the Commission decides utilities require protection, maintaining their financial integrity does not imply increased profitability

The applicants also argue that their own financial health is in the public interest, and that it is the Commission's responsibility to protect this interest:

*"...the Commission needs to take strong and certain measures to protect the Utilities from another significant threat to their financial strength."*³⁹

*"When the risk of fire materializes, third parties may assert claims; and when utilities are held liable for such claims, the resulting payments are an unavoidable cost of providing utility service. The Utilities are entitled to recover such costs, just as they are entitled to recover all other costs necessary to carry out their mission, as part of the regulatory compact. In exchange for providing utility service under regulated rates, long-standing regulatory policies provide that utilities are entitled to an opportunity to recover their operating costs plus a reasonable return."*⁴⁰

They quote D.02-11-026, which states: *"Reasonable financial health is necessary so that each utility may serve reliable, safe and adequate electricity at just and reasonable rates."*⁴¹

The key word in this decision is "reasonable". Utilities should not be guaranteed increased profits, particularly if they are rewarded for cutting costs on safety measures. Should this application be accepted in its current form, utilities will have lower expenses because they will no longer need to obtain liability insurance for catastrophic fire losses. Furthermore, because they would have blanket liability coverage except for willful neglect, they could potentially increase profitability by reducing expenditures on fire safety. The Commission would need to put safeguards in place to counter this inherent bias for cost savings should any variant of the application be accepted.

³⁹ Applicant Testimony; p. 15.

⁴⁰ Applicant Testimony; pp. 14-15.

⁴¹ D.02-11-026; Interim Opinion Modifying Decision 01-03-082 To Change Restriction On Use of Surcharge Revenues; p. 4.

4. If the Commission is going into the insurance business, it needs to apply insurance methods

The ratepayers of California are effectively being asked to become the insurance company for our utilities, and the utilities are asking the Commission to write the policy. If the Commission accepts the arguments in the application and determines that this is a reasonable request, they must also take measures to encourage responsible behavior and discourage irresponsible behavior on the part of the utilities in the same way that an insurer operating in the insurance market would in order to counter the inherent economic bias towards cost-cutting as a mechanism to improve profitability.

Some of the measures that the Commission could potentially put in place are familiar to anyone who deals with auto, health or home insurance:

- Allowing participation in the program only if certain criteria are met, for example, increased investment in fire safe infrastructure with scheduling of such capital investment approved and overseen by the Commission.
- Investigation of power line fire incidents by the Commission prior to any reimbursement of funds to cover uninsured losses and a clearly determined inapplicability of any such reimbursement if the utility is found to be responsible for the power line ignition through its equipment or personnel.
- Co-insurance – the utilities would have to pay a fraction of losses they incur. This would provide substantial incentive to avoid these losses.
- Applying cost recovery with a high “attachment point”, or deductible, so that only catastrophic losses that threaten financial integrity would be covered.
- Requiring that utilities pay into the coverage fund themselves to offset future losses. The payment amounts could be scaled to their safety records, as described below.

As noted in the application, the size of any given loss is randomly determined from an underlying size distribution, so in this sense it is hard to differentiate “careful” utilities from “careless” utilities unless we look at many fires over a long time scale. The utilities argue that, therefore, costs to utilities should not be based on the randomness of the fire size distribution, since this could potentially punish a “careful” utility more than “careless” one in some cases. There is

some merit to this argument if a more equitable means can be found to distribute costs to utilities based on their safety record.

Instead of relying on the randomness of fire loss sizes, the Commission could, for example, set up a mechanism that would score utilities based on criteria that are related to fire safety – such as the number of detected General Order violations, the number of fires alleged to be started by power lines as determined by investigators, etc. This score would then be used to determine the level of co-insurance, the size of the deductible, the cost of participation in the program, or even eligibility for the cost-recovery program. This would be a more equitable way of sharing the risk among the utilities while still creating an incentive for increased investment in power line fire prevention.

IV. CONCLUSION

The Commission needs to understand that the communities that have faced the fires of 2007 have deep skepticism about the motives underlying this application. In the past few years, people have faced major fires caused by utilities, seen the approval of a major transmission project to be built through fire-damaged areas, watched in San Diego as their utility counter-sued homeowners who've lost their homes in power line fires, and worried through the proposal by that same utility to shut off their power under conditions favorable to the utility. When faced with a joint proposal to allow utilities to collect reimbursement from them to pay damages for fires the utilities themselves cause, it should be understandable that this application will cause further outrage and resentment. As it is written, the Alliance recommends that this application be denied. If the Commission deems otherwise, the Commission must apply mitigation to remove the inherent flaws pointed out by the Alliance in this protest and which, unaddressed, would lead to even more serious power line fire problems in the future.

Respectfully submitted this 30th day of September, 2009,

By: /S/ **Diane Conklin**_____

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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 PROTEST** to all parties on the service list for Applications A.09-08-020, A.05-12-002, A.06-12-009, A.06-12-010, A.07-11-011, A.08-12-021, and R.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.

Executed this 30th day of September, 2009 at Ramona, California,

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