

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



FILED

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Order Instituting Rulemaking to Revise)
and Clarify Commission Regulations)
Relating to the Safety of Electric Utility and)
Communications Infrastructure Provider)
Facilities.)
_____)

Rulemaking 08-11-005
(Filed Nov. 6, 2008)

LOS ANGELES COUNTY'S REPLY BRIEF ON WORKSHOP REPORT FOR PHASE II

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Dated: September 17, 2010

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I. INTRODUCTION

The County of Los Angeles ("County") submits this Reply Brief regarding the Phase II Workshop Report for the workshops held by the Public Utilities Commission between January and June 2010. The County's support for, and opposition to, the various rules has not changed as a result of reviewing the briefs of other parties. In the interest of brevity, rather than reiterate the County's support or opposition for each proposal, the County will instead provide some general comments, a brief clarification, a short summary of positions of other parties that the County supports, and some closing thoughts.

Having reviewed the opening briefs of all other parties, the County remains convinced that significant safety and fire risks are posed by California's electrical transmission and distribution systems and Communication Infrastructure Provider (CIP) facilities. The County's sole purpose for its continued involvement in this rulemaking has been public safety. While many other parties were represented by thoughtful attorneys and recognized subject matter experts that brought many useful ideas to the table during the proceedings, their overarching goal often seemed more focused on how any changes to the rules would affect the profitability of their companies, while increasing public safety and decreasing fire hazards remained a secondary goal.

As it did at the end of Phase I, the County asks the Commission to reject the arguments of the CIP Coalition that there is no danger posed by their facilities. Time and time again during the workshop we heard how CIP facilities add a tremendous amount of weight to existing poles, how these same lines can create additional conductor sag, and the numerous climbing space violations these additional facilities have created. Furthermore, as a result of an abundance of pole-top antennas that have been added to existing infrastructure in the past decade, we now have

the potential for facilities that are above the conductors to fail and compromise the conductors below them as they fall to the ground.

Throughout the rulemaking and once again in their opening brief, the CIP Coalition referenced a report that a private contractor, *Exponent Incorporated* ("*Exponent*"), completed on their behalf. The *Exponent* report relied upon by the CIPs as proof that their facilities do not contribute to causing fires should be given little weight and consideration. A recent article on *Exponent* in the *Los Angeles Times* stated that "*Exponent's* research has come under fire from critics, including engineers, attorneys and academics who say the company tends to deliver to clients the reports they need to mount a public defense" (*Los Angeles Times, February 18, 2010*). In the past, *Exponent* has defended companies that produced second-hand smoke, were fighting off asbestos claims, and more recently, the Toyota Motor Corporation, as they tried to invalidate claims of sticking gas pedals and sudden acceleration in their vehicles.

The County once again asks the Commission to look closely at the motivating forces behind the proposed rule changes of various parties. The County compliments parties such as the Consumer Protection Safety Division (CPSD), the Division of Ratepayer Advocates, the Mussey Grade Road Alliance (MGRA), the California Farm Bureau Federation, Facilities Management, the International Brotherhood of Electrical Workers Local 1245 (IBEW 1245), and the Utility Reform Network as they have consistently demonstrated that increased safety, decreasing the chance of fires, avoiding overzealous tree trimming practices, and refraining from the trampling of private property rights have rightly remained their goal. As such, the County urges the Commission to carefully consider the opinions of the aforementioned parties, as the County believes they are truly motivated by the overarching goal of increasing public safety and decreasing the occurrence of fires.

In reviewing SDG&E's Opening Brief there was some concern that the County's response to Multiple Alternative Proposal (MAP) No. 8(B) was misplaced and actually should have been addressed as opposition to MAP No. 8(A). This is correct. The County clarifies its position on MAP No. 8(A). MAP No. 8(A) proposed an expansion of minimum clearance distances at the time of pruning that were established in Phase I. The minimum clearance distances at the time of pruning for Rule 35, Appendix E, Table 1, Case 14 that were achieved during Phase I should not be increased. While this opinion ran counter to what some would expect in a County with many trees which are often intermingled with power lines and other facilities, the County understands that a balance between increased public safety, aesthetics, and maintaining healthy and vigorous vegetation must be achieved.

The MGRA has stated that as a result of the Phase I decision, minimum pruning distances have been increased in SDG&E's service territory, and in many cases SDG&E has exceeded the minimum clearance distances based on justifications found within the existing rules. If a species of tree is particularly fast-growing or there are other reasons to exceed minimum pruning requirements, sufficient justification already exists within the current rules to complete any additional necessary pruning.

The County supports several of the proposed rule changes put forth by CPSD, MGRA, and IBEW 1245. In particular, the County supports CPSD's rationale and reasoning for MAP No. 6(C and E), MAP No. 11(B), MAP No. 13(A), and MAP No. 14(A). Also, the County joins CPSD in opposing MAP No. 11(A). The County also continues to support the following MAPs proposed by the MGRA: MAP No. 4, MAP No. 13(A), and MAP No. 14(A). In addition, the County is in alignment with MGRA in opposing MAP No. 7(A and B) and MAP No. 8(B). Also, the County joins IBEW 1245 in support of MAP No. 3(B), MAP No. 6(D and E), MAP

No. 9, and MAP No. 12. Lastly, the County joins IBEW 1245 in their opposition to MAP No. 11(A).

Although the Scoping Memo clearly spelled out that rules that limited the liability of utilities and others were not to be a part of the workshops, many items that seemed to do exactly this made it into both the consensus portion and the MAP portion of the Final Workshop Report. As a result, proposals to remove language like "will not fail," replacing the word "violation" with "nonconformance" and a proposal that would shift utility liability to customers were included in the Workshop Report. While the Commission is well aware of these issues, the County believes that these veiled attempts by the utilities to reduce their potential liabilities should be highlighted one more time.

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In conclusion, the County would like to again thank the Public Utilities Commission for initiating the Rulemaking and for considering the County of Los Angeles' opinions. In addition, the County wishes to acknowledge all parties that participated in the Rulemaking 08.11.005 and the outstanding work completed by the Sunesys Team that completed the Workshop Report. Finally, the County reserves its highest praise for the assigned Administrative Law Judges, Angie Minkin and Jean Vieth, who served as facilitators throughout the Phase II workshops and steered the parties through the many complicated issues. The County hopes the Commission will take strong action to reduce hazards, increase safety, and reduce the risk that utility-caused wildland fires will further impact the citizens of the State of California. We are hopeful that the new rules, when approved, will lessen the occurrence of wildland fires, enhance the safety and health of the public, and will provide the greatest protection for the environment, public and private property.

Respectfully submitted on September 17, 2010, in Los Angeles, California,

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VERIFICATION

I, John R. Todd, say:

I, as Chief of Forestry for the Los Angeles County Fire Department, am authorized to make this verification on behalf of the County of Los Angeles and I make this verification for that reason.

I have read the foregoing Phase II Reply Brief of Los Angeles County and am informed and believe that the matters therein are true, and on that ground I allege that the matters stated herein are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at Los Angeles, California, this 16th day of September, 2010.



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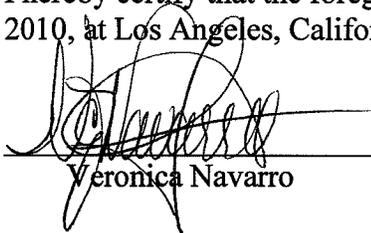
CERTIFICATE OF SERVICE

Veronica Navarro hereby certifies that on September 17, 2010, I served a copy of the

LOS ANGELES COUNTY'S REPLY BRIEF ON WORKSHOP REPORT FOR PHASE II

on all parties to CPUC Proceeding R. 08-11-005 as indicated on the attached PUC service list. Copies were sent via email to those parties who have supplied an email address and by U.S. Mail (first-class postage prepaid) to those parties who did not supply an email address.

I hereby certify that the foregoing is true and correct and that this was executed on September 17, 2010, at Los Angeles, California.



Veronica Navarro



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