

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

11/05/18
04:59 PM

Order Instituting Rulemaking to
Implement Electric Utility Wildfire
Mitigation Plans Pursuant to Senate
Bill 901 (2018).

Rulemaking 18-10-007

COMMENTS OF THE OFFICE OF THE SAFETY ADVOCATE

CHRIS CLAY

Attorney for the
Office of the Safety Advocate

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Telephone: (415) 703-1123
Email: christopher.clay@cpuc.ca.gov

JOAN E. WEBER

Sr. Utilities Engineer for the
Office of the Safety Advocate

California Public Utilities Commission
320 W 4th St., Ste 500
Los Angeles, CA 90013
Telephone: (213) 266-4729
Email: joan.weber@cpuc.ca.gov

November 5, 2018

I. INTRODUCTION

Pursuant to the Order Instituting Rulemaking (OIR) in Rulemaking (R.)18-10-007 issued on October 25, 2018, and Rule 6.2 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, the Office of the Safety Advocate (OSA) hereby submits these comments on the scope and schedule of the OIR.

OSA is intervening in this proceeding to advocate for safety and to contribute to the Commission's deliberations in accordance with OSA's legislative mandate. Public Utilities Code Section 309.8 established OSA to, among other things, help inform "the official record on safety-related risks in applicable commission proceedings".

II. COMMENTS

OSA generally agrees with the scope of the proceeding as set forth in the OII. And, OSA agrees with the preliminary schedule especially given the strict time requirements imposed by Senate Bill (SB) 901 as codified in Public Utilities Code Section 8386. In addition, OSA offers these recommendations on the scope of the proceeding:

- In lieu of hearings, OSA supports holding a series of workshops in January to gather and share information on the pros and cons of various wildfire mitigation measures. The Commission should invite utilities, industry experts, foreign regulators and utilities (including Australia), academia, CAL FIRE, and more. Given that it appears the utilities are not uniform in their beliefs on what mitigation proposals will provide the most benefit for the cost, a survey of best practices would be helpful.
- The Commission should require that utilities develop metrics and gather data so that the Commission and stakeholders may more expediently evaluate the effectiveness of the mitigation plans. This should include metrics and data on the effectiveness and consequences, including unintended consequences, of alternative mitigation measures such as de-energization.
- The Commission should identify common circumstances among the victims of wildfires (medical circumstances, mobility, communication outages, power outages, emergency notification, location) that may contribute to or increase victim vulnerability to wildfires. Identifying such circumstances, may lead to identifying proactive solutions that can save lives.

- The Commission should require the utilities, as part of their annual Wildfire Mitigation Plan reporting, to submit to the Commission an accounting of near miss incidents of any equipment failure (e.g., capacitor, transformer, fuse, etc.), facility failure (e.g., wire, pole, etc.), object caused failure (e.g., electrically conductive balloon, vehicle, animal, etc.), and any other events that result in a fire. All fire causing incidents should be considered near miss incidents and should be reported within 48 hours of the incident to the Commission's Wildfire Mitigation Unit regardless of injuries or damages. These near miss incident reports should be brief (1 to 3 pages). The reports should contain information, such as, the location of the fire (e.g., capacitor bank 100 feet south of Main St. and 5th St. or substation at 300 Main St.), the suspected cause of the fire (e.g., fault at splice, animal in transformer bushings, broken pole, etc.), and whether the Fire Department was called. The incident reports would enable the Commission to quickly gather data and build its own data base of fire causes. They could also more quickly bring to light problems with certain manufacturers' equipment (e.g., poorly performing fuses). The near miss reports would become part of the utilities' annual reports.
- The Commission should promote robust use of root cause analyses of ignitions, failures, and near misses to identify the most effective corrective actions and mitigations.

III. CONCLUSION

OSA appreciates the opportunity to fulfill its statutory mandate by participating in this proceeding. OSA respectfully requests that the Administrative Law Judge and the Commission adopt the recommendations discussed above.

Respectfully submitted,

/s/ CHRIS CLAY

Chris Clay
Attorney

Office of the Safety Advocate

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Tel: (415) 703-1123
E-mail: christopher.clay@cpuc.ca.gov

November 5, 2018