

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

**PUBLIC ADVOCATES OFFICE'S PETITION FOR MODIFICATION
OF DECISION (D.) 20-12-030, D.17-12-024 AND D.17-01-009 IN ORDER TO
UPDATE HIGH THREAT FIRE DISTRICT MAPPING**

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I. INTRODUCTION

Pursuant to California Public Utilities Commission (Commission or CPUC) Rule of Practice and Procedure 16.4,¹ the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits this Petition for Modification (Petition) of the following Commission Decisions, collectively referred to as “Wildfire Risk Mapping Decisions”:

- a. Decision Modifying The High Fire Threat District Boundaries In Southern California Edison Company’s Service (D.20-12-030);
- b. Decision Adopting Regulations to Enhance Fire Safety in the High Fire-Threat District (D.17-12-024);
- c. Decision Adopting A Work Plan For the Development Of Fire Map 2 (D.17-01-009).

Cal Advocates seeks modification of the Wildfire Risk Mapping Decisions to: (1) update mapping of the Commission’s High Fire-Threat District (HFTD) areas, and all similar or analogous high risk fire areas in California’s regulated service areas to reflect the most up to date wildfire risks; and (2) require that all of California’s regulated electric Investor

¹ Throughout this pleading, reference to the Commission’s Rules of Practice and Procedure are referred to as “Rule” if referencing one rule, or “Rules” if referencing more than one rule.

Owned Utilities update the HFTD maps in their service territories once every five years, to show the latest areas that are subject to the highest wildfire risk.²

In 2019, Southern California Edison Company (SCE) filed a Petition to Modify Decision (D.) 17-12-024,³ stating: “It is crucial that objective risk-informed analysis remain the foundation of the Investor-Owned Utilities’ (IOUs) wildfire risk mitigation actions.”⁴ Cal Advocates files this Petition based upon the same rationale that SCE’s Petition to Modify raised in 2019.⁵

II. REGULATORY BACKGROUND

A. The Commission Has Required or Recognized the Need for Past High Fire Threat District Updates

The Commission has already required or recognized the potential need to establish and update HFTD or related fire risk maps.

1. Regulatory Background Regarding D.20-12-030, D.17-12-024, and D.17-01-009.

In May 2015, the Commission opened Order Instituting Rulemaking (R.)15-05-006. The Commission issued Wildfire Risk Mapping decisions in R.15-05-006. R.15-05-006 focused on fire safety⁶ and included as its focus instruction to:

“Develop and adopt a Fire Map 2. The purpose of Fire Map 2 is to delineate the boundaries of a new High Fire-Threat District where

² The term HFTD is meant to broadly refer to “High Fire Threat Districts” as well as other areas and/elements that are identified by California regulated utilities as having areas subject to high wildfire risk, including but not limited to SCE’s “High Fire Risk Areas.”

³ D.17-12-024, entitled, “Decision Adopting Regulations to Enhance Fire Safety in the High Fire-Threat District”.

⁴ R.15-05-006, Southern California Edison Company’s (U338-E) Petition for Modification of Decision on 17-12-024, August 19, 2019, p. 1.

⁵ See D.20-12-030, p. 9, OP 1, and pp. 4-6, Section 2, which approved SCE’s requested to modify the boundaries of the High Fire Threat District within and near its service territory, with certain additional modifications.

⁶ R.15-05-006, p. 6.

stronger fire-safety regulations adopted in R.08-11-004 and this proceeding will apply.”⁷ ⁸

D.17-01-009 adopted the work plan for the development and adoption of Fire Map 2, and called it a statewide fire-threat map. According to that decision,

The purpose of Fire Map 2 is to designate areas where there is an elevated hazard for utility-associated wildfires to occur and spread rapidly, and where communities face an elevated risk from utility-associated wildfires. Fire Map 2 will be used to delineate the boundaries of a new High Fire-Threat District where stricter fire-safety regulations apply...Electric utilities will have primary responsibility for the development of Fire Map 2.

D.17-01-009, Ordering Paragraph 1 ordered the approval of the Fire Map 2 Work Plan described in the Workshop Report with certain listed modifications.⁹ Ordering Paragraph 1.nn also required that “Fire Map 2 shall be effective on the date that the Tier 1 advice letter submitted to SED in Step 3 is approved by a disposition letter or, if necessary, by a Commission resolution.”¹⁰

D.17-12-024, the Commission’s Decision Adopting Regulations to Enhance Fire Safety in the High Fire-Threat District, concluded “The High Fire-Threat District Map will become effective upon the Commission’s adoption of the CPUC Fire-Threat Map pursuant to D.17-01-009, Ordering Paragraph 1.nn.”¹¹

Since the issuance of D.17-02-024, the mapping of High Fire-Threat Districts by Southern California Edison (SCE) and Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric Company (SDG&E) have had distinctly different procedural histories.

⁷ R.15-05-006 was in part a successor proceeding to R.08-11-005, which was intended to revise and clarify Commission regulations relating to the safety of electric utility and communications infrastructure provider facilities.

⁸ R.15-05-006, p. 6.

⁹ D.17-01-009, pp. 77-86.

¹⁰ D.17-01-009, p. 86, OP 1.nn.

¹¹ D.17-12-024, p. 151, Conclusion of Law (COL) 10.

On August 19, 2019, SCE filed a Petition for Modification of D.17-12-024 (SCE Petition) to update its fire risk mapping to “align the Commission’s High Fire-Threat District maps with SCE’s internal High Fire Risk Area (HFRA) designations.”¹² SCE noted that D.17-12-024 adopted specific HFTD’s,¹³ but that SCE’s 2019 Wildfire Mitigation Plan (WMP) addressed areas beyond the HFTD.¹⁴ SCE’s request for modification claimed, “it is critical that the Commission’s official fire maps and the utilities’ operational practices reflect the most up-to-date and granular risk-informed analyses.”¹⁵ SCE identified a number of factors that it stated were relevant to its risk analysis underlying the mapping, including, electrical facilities description, historical fire information, vegetation management activity, tree mortality area designation, and fuel sources.¹⁶ These factors are subject to change over time as field conditions change.

D.20-12-030 adopted SCE’s proposed changes to the High Fire-Threat District (with modifications specified in Section 2 of that decision).¹⁷ D.20-12-030 noted that the authorized fire mapping changes were based upon criteria that “were factors impacting the likelihood of fire ignition and spread, including fuel type, density and arrangement, climate influences on moisture and content distributions; climatology of fire weather (fire wind speeds and directions, temperature, precipitation); and terrain (slope, ruggedness, access, and fire break) along with geographical context to other key land and fuel features.”¹⁸

D.20-12-030 concluded it was reasonable to consider SCE’s petition to modify a prior decision,¹⁹ and found that areas identified in SCE’s petition, as modified by the

¹² SCE Petition for Modification of D.17-12-024, August 19, 2019, p. 2.

¹³ SCE Petition for Modification of D.17-12-024, August 19, 2019, p. 2.

¹⁴ SCE Petition for Modification of D.17-12-024, August 19, 2019, p. 3.

¹⁵ SCE Petition for Modification of D.17-12-024, August 19, 2019, p. 10.

¹⁶ SCE Petition for Modification of D.17-12-024, August 19, 2019, p. 8-9.

¹⁷ D.20-12-030, p. 9, Ordering Paragraph (OP) 1.

¹⁸ D.20-12-030, p. 5.

¹⁹ D.20-12-030, p. 8, Conclusion of Law (COL) 1.

decision, were areas where there is an elevated or extreme risk...from wildfires associated with overhead utility power lines or overhead utility power-line facilities also supporting communication facilities; these areas are therefore appropriate for inclusion in the High Fire-Threat District.²⁰

2. Additional Regulatory Background

In 2020, SCE was directed to provide supplemental information regarding its Petition to Modify.²¹ Many of the categories of information the ALJ instructed SCE to provide are subject to change over time as field conditions change, including: SCE overhead distribution circuit miles, SCE underground distribution circuit miles, SCE overhead transmission circuit miles, SCE underground subtransmission circuit miles, SCE overhead transmission circuit miles, SCE underground transmission circuit miles, number of previous ignitions, number of tree trims in calendar years of 2018 and 2019, and number of dead trees identified within given mapping areas known as “polygons”.²² All of these factors are subject to change over time.

In D.19-05-039 regarding SDG&E’s Wildfire Mitigation Plan, the Commission recognized legislation which requires that Wildfire Mitigation Plans identify changes of mapped high fire wildfire threat areas “based on new information or changes in the environment.”²³

In January 2018, the Commission adopted PG&E’s High Fire Threat District Map, which replaced the previous fire threat maps that were adopted on an interim basis in 2012.²⁴ In 2019, when SCE’s mapped “High Fire Risk Areas” (HFRA’s) did not precisely match the CPUC’s mapping of High Fire Threat Districts (HFTD’s), the Commission instructed: “[I]f the aforementioned process were to find that SCE’s HFRA

²⁰ D.20-12-030, p. 8, Finding of Fact (FOF) 1.

²¹ R.15-05-006, Email ruling Requiring Supplemental Information, July 27, 2020, pp. 3-4.

²² *Id.*

²³ D.19-05-039, Decision on San Diego Gas & Electric Company’s 2019 Wildfire Mitigation Plan Pursuant to Senate Bill 901, “Appendix A-List of requirements in SB 901 for WMPs”, pp. A2 and A3.

²⁴ D.19-05-037, Decision on Pacific Gas and Electric Company’s 2019 Wildfire Mitigation Plan Pursuant to Senate Bill 901, p. 20.

is indeed better representative of areas with elevated or extreme fire risk, then SCE should seek an amendment to the HFTD map to include any such areas.”²⁵

B. The Commission Has Relied on High Fire Threat Districts to Evaluate Wildfire Risk

The Commission has relied on HFTD’s and the risks associated with them, to evaluate whether wildfire mitigation measures are appropriate. As recently as 2019, the Commission concluded that:

- “PG&E should evaluate alternatives or comparison studies to evaluate whether all circuit miles of conductor in the HFTD should be covered...”²⁶
- “PG&E’s 2020 WMP should provide analyses evaluating the efficacy of past operational practices and investments in limiting ignitions, *especially in HFTD and during high risk weather conditions.*”²⁷
- “Providing a summary of (San Diego Gas & Electric Company’s) inspections in the HFTD in the WMP would better inform decisionmakers about whether the fire mitigation measures proposed in the WMPs are properly directed or need adjustment.”²⁸
- “SDG&E states that it places importance on the HFTD by performing more frequent inspections and expanding its tree-trim scope there.”²⁹

III. RECENT LEGISLATION SHOWS THE NEED TO GRANT THIS PETITION

On September 29, 2022, Senate Bill 884 was enacted. SB 884 allows California’s large electrical corporations to file a distribution infrastructure undergrounding plan, including timelines for completion of identified and prioritized undergrounding projects,

²⁵ D.19-05-038, Decision on Southern California Edison Company’s 2019 Wildfire Mitigation Plan Pursuant to Senate Bill 901, p. 7.

²⁶ D.19-05-037, Decision on Pacific Gas and Electric Company’s 2019 Wildfire Mitigation Plan Pursuant to Senate Bill 901, p. 53, Conclusion of Law 9.

²⁷ D.19-05-037, Decision on Pacific Gas and Electric Company’s 2019 Wildfire Mitigation Plan Pursuant to Senate Bill 901, p. 55, Conclusion of Law 26 (Emphasis added).

²⁸ D.19-05-039, Decision on San Diego Gas & Electric Company’s 2019 Wildfire Mitigation Plan Pursuant to Senate Bill 901, p. 26, Conclusion of Law 2.

²⁹ D.19-05-039, Decision on San Diego Gas & Electric Company’s 2019 Wildfire Mitigation Plan Pursuant to Senate Bill 901, p. 8.

and mileage completion targets for each year covered by the plan.³⁰ Each plan is required to compare underground versus aboveground hardening of electrical infrastructure or other mitigation strategies. The comparison is required to emphasize risk reduction and include an analysis of the activity for reducing wildfire risk. If the plan is approved, each large electrical corporation is required to timely correct plan deficiencies identified by an independent monitor each year.³¹

Statewide wildfire mapping updates are needed to precisely inform the risk reduction and analysis of activity for reducing wildfire risk contemplated by SB 884. For example, the High Fire Threat Areas identified in PG&E's 2023 WMP must be excluded from SB 884 as they are not tier 2 or 3 High Fire Threat Districts (HFTDs)³² as required under Public Utilities Code Section 8388.5(c)(2).

IV. RECENT UTILITY ANALYSIS INDICATES THAT STATEWIDE WILDFIRE MAPPING DOES NOT CAPTURE ALL THE AREAS WHERE CATASTROPHIC WILDFIRES COULD OCCUR

PG&E's 2023 Wildfire Mitigation Plan (WMP), dated March 27, 2023, updates its wildfire risk mapping.³³ Figure 1 shows the locations of HFTDs, and HFRAs³⁴ in

³⁰ Pub. Util. Code Section 8388.5(c).

³¹ Pub. Util. Code Section 8388.5(g).

³² See, R.15-05-006, p. 4 ["The fire-threat map developed by CAL FIRE, with appropriate modifications recommended by the parties, will be used to draw the boundaries of a new High Fire-Threat District where stronger fire-safety regulations adopted in R.08-11-005 will apply."]

³³ PG&E Wildfire Mitigation Plan, Cover Page. Available at: https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/2023-wildfire-mitigation-plan.pdf Accessed: April 6, 2023

³⁴ According to PG&E's 2023 Wildfire Mitigation Plan, p. 832, its High Fire Risk Area map considers catastrophic fire risk factors and utility infrastructure and was developed by considering incremental changes to the HFTD map boundaries to add areas where risk factors for the potential of catastrophic fire from utility infrastructure ignition during offshore wind events is higher. SCE has a different definition of High Fire Risk Area. On the other hand, according to SCE's Petition to Modify D.17-12-024, p. 3, "Since the issuance of D.17-12-024, from an operational perspective SCE has maintained HFRA designations that were a combination of its historical map boundaries (based on past fire management and response experiences) CAL FIRE's Fire Hazard Severity Zone (FHSZ) maps, and most recently, the CPUC's HFTD map. SCE has considered Zone 1, Tier 2, and Tier 3 (collectively, the HFTD), and non-CPUC historical high fire risk areas, to collectively be "HFRA."

PG&E’s service territory.³⁵ In addition to the existing HFTDs, PG&E has designated large areas within its service territory as HFRAs, shown in blue. PG&E states that HFRAs are “used to inform workplans and conduct risk assessments.”³⁶ PG&E also notes that the HFRAs “...include locations where an ignition during an offshore wind event could lead to a catastrophic wildfire.”³⁷ The HFRAs identified by PG&E, shown in blue on Figure 1, represent an additional two million acres, equivalent to an 8% increase to the existing HFTDs.³⁸

As discussed in more detail in Section VI.C below, other California electric utilities are not as current in their wildfire risk related mapping efforts as PG&E.

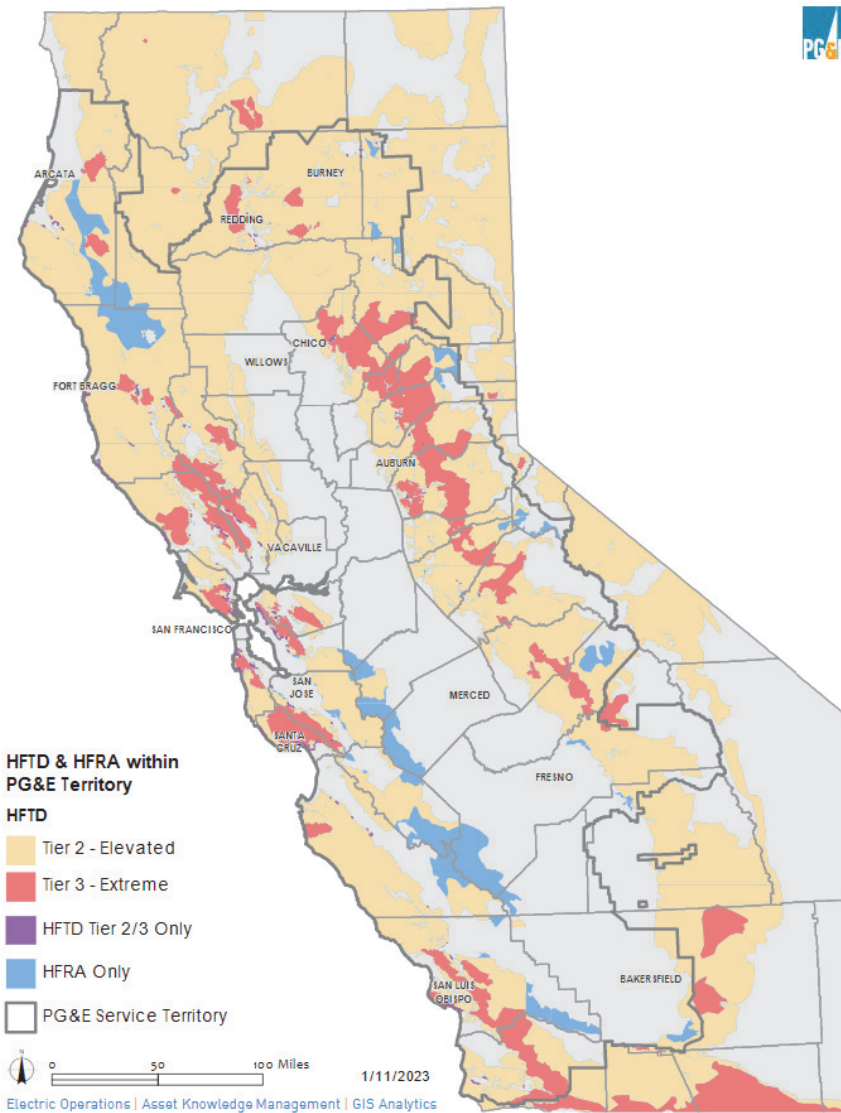
³⁵ PG&E Wildfire Mitigation Plan, p. 98, March 27, 2023.

³⁶ PG&E Wildfire Mitigation Plan, p. 96, March 27, 2023.

³⁷ PG&E Wildfire Mitigation Plan, p. 96, March 27, 2023.

³⁸ 2023-2025 Wildfire Mitigation Plan Errata Public Attachments
https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/pge-2023-wmp-r1-attachments.zip Accessed: April 7, 2023

Figure 1: PG&E’s Wildfire Risk Map from Its March 27, 2023 Wildfire Mitigation Plan³⁹



V. THERE IS A SAFETY NEED TO UPDATE FIRE RISK MAPS IMMEDIATELY AND FREQUENTLY

In SCE’s words, “it is critical that the Commission’s official fire maps and the utilities’ operational practices reflect the most up-to-date and granular risk-informed

³⁹ PG&E 2023-2025 Wildfire Mitigation Plan. Pg. 98, March 27, 2023.

analyses.”⁴⁰ The SCE Petition’s rationale applies to the need for Statewide updates to wildfire risk mapping today and on an ongoing basis. This rationale should apply statewide, to allow for a seamless State wildfire threat map that identifies the most up-to-date boundaries of HFTDs and similar high wildfire risk areas such as, but not limited to, HFRAs, as soon as practicable, and on an ongoing basis every five years.

VI. REQUEST FOR RELIEF

Cal Advocates recommends that the Commission modify D.20-12-030, D.17-12-024, and D.17-01-009, so that all electric utilities in California⁴¹ are required to update their wildfire risk mapping immediately, and on an ongoing basis every five years.

A. Public Advocates Office Requests Immediate Updates to the State-wide Wildfire Risk Map

This Petition requests that, as soon as practical, the Commission require each regulated utility to update its mapping to show areas of highest wildfire risk in its service territory. Such mapping should include the most up-to-date boundaries of High Fire Threat Districts, High Fire Risk Areas, and analogous areas based upon the IOU’s most up to date assessments of wildfire risk.

As discussed above, the Commission has required or recognized the need for past updates to HFTD’s, and used those HFTD’s to evaluate wildfire risk.⁴² This request comports with such precedent. Also, SB 884 requires utilities who participate in a distribution infrastructure undergrounding program to compare undergrounding, aboveground hardening, and other mitigation strategies for purposes of emphasizing wildfire risk reduction. SB 884 also requires that that only tier 2 or 3 HFTD’s or rebuild areas may be considered and constructed as part of the program.⁴³ SB 884 would not properly achieve these requirements if utilities used outdated HFTD mapping to follow

⁴⁰ SCE Petition for Modification of D.17-12-024, August 19, 2019, p. 10.

⁴¹ For a list of Investor-Owned Electric Utilities, see R.15-05-006, Order Instituting Rulemaking to Develop and Adopt Fire-Threat Maps and Fire-Safety Regulations, May 15, 2015, p. B-1, Appendix B.

⁴² See Section II above for additional discussion.

⁴³ See Section III above for additional discussion.

them. In addition, as illustrated by PG&E’s 2023 wildfire mitigation plan, PG&E’s latest mapping updates just added large amounts of high fire risk areas.⁴⁴ This suggests other utilities may have similar or analogous areas of high wildfire risk that need mapping updates. Finally, this Petition is supported by SCE’s stated rationale that “[I]t is critical that the Commission’s official fire maps and the utilities’ operational practices reflect the most up-to-date and granular risk-informed analyses.”⁴⁵

B. The Public Advocates Office Requests Ongoing Updates to a State-wide Wildfire Risk Map Every Five Years

D.17-01-009 set forth the Commission’s intent to update Fire Map 2 in ten-year cycles.⁴⁶ D.17-01-009 also adopted the recommendation that:

Fire Map 2 be updated in ten (10) year cycles as part of a rulemaking process that provides for public input, expert review and workshops that will (i) examine whether to incorporate recent advances, if any, in fire science modeling, (ii) incorporate recent fire history, and (iii) address any notable changes in the fuel landscape, urban growth and utility infrastructure and operational practices.⁴⁷

The Commission should modify the requirement to update Fire Map 2 from every 10 years to every five years. A five-year update requirement comports with SCE’s rationale stated above. Moreover, as Figure 1 and the related discussion shows, PG&E’s latest mapping from its WMP shows that even its recent mapping was in dire need of updating. This suggests public safety needs would be better met if utilities across the state update their wildfire risk mapping every five years.

⁴⁴ See Section IV above for additional discussion.

⁴⁵ See Section V above for additional discussion. See also, SCE Petition for Modification of D.17-12-024, August 19, 2019, p. 10.

⁴⁶ D.17-01-009, p. 50.

⁴⁷ D.17-01-009, p. 77, OP 1, adopting Fire Map 2 Work Plan contained in Appendix A; See also, D.17-01-009, Appendix A, p. A-23.

C. This Petition Is Timely

The Commission’s Rules require that unless a Petitioner “explain[s] why the petition could not have been presented within one year of the effective date of the decision” that “a petition for modification must be filed and served within one year”⁴⁸

D.20-12-030 became effective in December, 2020; D.17-12-024 became effective in December, 2017; and D.17-01-009 became effective January, 2017. On September 29, 2022, more than five years after D.17-01-009 and more than two years after D.20-12-030, SB 884 was enacted. Statewide wildfire mapping updates are needed to precisely inform the risk reduction and analysis of activity for reducing wildfire risk contemplated by SB 884.

On March 27, 2023, PG&E provided updates to its HFTD maps that added swaths of areas of high risk.⁴⁹ These new HFRA’s classify an additional 4.5% of PG&E’s service territory that are not in HFTDs as being susceptible to catastrophic wildfire.⁵⁰ Before PG&E’s updates, its High Fire Threat District maps were over five years old. SCE filed a Petition for Modification of the HFTD boundaries within its territory,⁵¹ and was subsequently instructed to update its risks map in December 2020,⁵² via tier 1 advice letter, which it filed in January 2021.⁵³ In contrast, SDG&E has not been required to update their HFTDs since their adoption in 2018.⁵⁴ Cal Advocates is not aware of the

⁴⁸ Rule 16.4(d).

⁴⁹ PG&E Wildfire Mitigation Plan, p. 98. Available at: https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/2023-wildfire-mitigation-plan.pdf Accessed: April 6, 2023

⁵⁰ 2023-2025 Wildfire Mitigation Plan Errata Public Attachments https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/pge-2023-wmp-r1-attachments.zip Accessed: April 7, 2023

⁵¹ SCE PFM August 19, 2019.

⁵² D.20-12-030 Decision Modifying the High Fire-Threat District Boundaries in Southern California Edison Company’s Service. Pg.9, Ordering Paragraph 2.

⁵³ AL 4397-E, January 20, 2021.

⁵⁴ Adopted via disposition of a Tier 1 Advice Letter January 18, 2018, as determined by D.17-01-009 Decision Adopting a Working Plan for the Development of Fire Map 2, Pg. 86 Ordering Paragraph 1.

Commission requiring any of the other electric utilities in California to update their statewide mapping.

As shown in the regulatory history section of the Petition, the Commission has recognized in the past that the information on these maps needs updating, as the information they convey can and often does change based upon environmental conditions.

D. Cal Advocates’ Specific Proposed Wording Changes to D.20-12-030, D.17-12-024, and D.17-01-009.

Rule 16.4(b) requires that “[a] petition for modification of a Commission decision must concisely state the justification for the requested relief and must propose specific wording to carry out all requested modifications to the decision”.⁵⁵ Cal Advocates’ detailed justification for the proposed changes to D.20-12-030, D.17-12-024, and D.17-01-009, is described above. Cal Advocates’ specific proposed wording changes to these Decisions are set forth in Appendix A hereto.

Respectfully submitted,

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⁵⁵ Rule 16.4(b).

APPENDIX A

Proposed Changes to D.20-12-030, D.17-12-024, and D.17-01-009.,

Ordering Paragraphs

(new) Public Advocates Office's Petition for Modification is hereby granted. Accordingly, Southern California Edison, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Bear Valley Electric Service, Liberty Utilities West, PacifiCorp, and Southern California Gas Company are required to update their High-Fire Threat District Maps, or corresponding fire risk maps within one year, and once every five years thereafter, to include only the aboveground electric lines that experience the highest 50% risk in its service territory. Each of these Investor Owned Utilities shall serve all updated High-Fire Threat District Maps or analogous high fire risk maps on the service list of Commission Rulemaking 15-05-006, and file the updated High Fire Threat District Maps or analogous high fire risk maps in the docket of that proceeding.