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 RESPONSE TO SOUTHERN CALIFORNIA EDISON COMPANY'S (U-338-E) PETITION FOR MODIFICATION OF DECISION 17-12-024 TO UPDATE HIGH FIRE THREAT DISTRICT BOUNDARIES IN ITS SERVICE TERRITORY

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I. INTRODUCTION

Pursuant to Rule 16.4(f) of the California Public Utilities Commission (Commission or CPUC) Rules of Practice and Procedure, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits this response to Southern California Edison Company's (SCE) *Petition for Modification of Decision* (D.) *17-12-024 to Update High Fire Threat District Boundaries in its Service Territory* (PFM or petition), filed on November 8, 2024.[1] D.17-12-024, the Commission's *Decision Adopting Regulations to Enhance Fire Safety in the High Fire-Threat District*, established the Commission's statewide mapping of High Fire-Threat Districts (HFTD).[2] With its PFM, SCE seeks to update the HFTD map of its service territory with the net addition of 40 square miles to the HFTD.[3]

Cal Advocates generally concurs with SCE's PFM, seeking approval for specific HFTD mapping changes subject to independent review. SCE's PFM aligns with

[1] SCE's PFM available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M545/K343/545343910.PDF

[2] D.17-12-024 for *Order Instituting Rulemaking* (R.) *15-05-006 to Develop and Adopt Fire-Threat Maps and Fire-Safety Regulations* at: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M200/K976/200976667.PDF

[3] SCE proposes the addition of 208 square miles to the HFTD and removal of 168 square miles from the HFTD. Detailed descriptions of proposed changes available as PFM Appendix C at: https://www.sce.com/safety/wild-fire-mitigation

Cal Advocates' own *Petition for Modification of D.20-12-030, D.17-12-024 and D.17-01-009 in order to update High Threat Fire District Mapping* (Cal Advocates Petition), filed April 19, 2023, which seeks to (1) revise HFTD mapping to reflect the most up-to-date wildfire risks, and (2) require all regulated electric Investor-Owned Utilities to update HFTD maps of their service territories every three to six years.[4]

Cal Advocates also proposed that the Commission adopt a process for updating utilities' wildfire risk mapping, including the requirement that each utility should identify its risk analytics, inputs, and rationale for mapping updates for Commission review and approval.[5] The further review of SCE's PFM, should the Commission grant it, should include the same information that Cal Advocates previously recommended.[6]

II. DISCUSSION

A. The Commission Has Recognized the Need for High Fire Threat District Updates for SCE and Should Initiate Updates for Other Utilities

The Commission has already recognized the need to update HFTDs in SCE's service territory via two previous Decisions. First, on May 30, 2019, the Commission issued D.19-05-038 regarding SCE's Wildfire Mitigation Plan and stated:

> if the aforementioned process [of independent vetting] were to find that SCE's HFRA 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.[7]

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[4] *Public Advocates Office's Petition for Modification of D.20-12-030, D.17-12-024 and D.17-01-009 in order to Update High Threat Fire District Mapping* (Cal Advocates Petition) at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M506/K523/506523174.PDF.

Cal Advocates initially proposed HFTD updates at five-year intervals, but later changed to three- to six-year intervals to match wildfire mitigation planning cycles. *Public Advocates Office's Reply to Responses to its Petition for Modification of D.20-12-030, D.17-12-024 and D.17-01-009* at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M510/K287/510287289.PDF

[5] See *Public Advocates Office's Reply to Responses* at 1-2.

[6] See *Public Advocates Office's Reply to Responses* at 1-2 and 8-10.

[7] D.19-05-038, *Decision on Southern California Edison Company's 2019 Wildfire Mitigation Plan Pursuant to Senate Bill 901*, at 7: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M298/K487/298487636.PDF

Consequently, SCE filed a *Petition for Modification of Decision 17-12-024* on August 19, 2019, to update its fire risk mapping by aligning the HFTD map with SCE's internal High Fire Risk Area (HFRA) designations.[8] In D.20-12-030,[9] the Commission adopted SCE's proposed changes with modifications.[10] D.20-12-030 found that areas identified in SCE's petition had elevated or extreme wildfire risk associated with overhead utility power lines, and as such were appropriate for inclusion in the HFTD map.[11] The present petition is SCE's second request for a modification to HFTDs.

SCE should be commended for their initiative in recognizing the need for and requesting periodic updates to the HFTD maps. Other utilities have not demonstrated why they have not updated HFTDs in their service territories to reflect the evolving understanding of fire risk. For example, Pacific Gas and Electric Company (PG&E) updated its HFRAs in its 2023-25 Wildfire Mitigation Plan and identified an additional two million acres, or 4.4 percent of PG&E's service territory, as high fire risk.[12] PG&E stated that these HFRAs are "used to inform workplans and conduct risk assessments."[13] However, these new HFRAs are not designated in HFTD maps as susceptible to catastrophic wildfire and have not been independently vetted or analyzed. Other California electric utilities are not even as current in wildfire risk mapping efforts as PG&E. For example, San Diego Gas & Electric Company (SDG&E) has not updated its HFTD maps since the maps were first adopted in 2018.

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[8] SCE's 2019 *Petition for Modification of Decision 17-12-024* available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M311/K289/311289489.PDF

[9] D.20-12-030, *Decision Modifying the HFTD Boundaries in Southern California Edison Company's Service*, at: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M356/K223/356223869.PDF

[10] California Department of Forestry and Fire Protection (CAL FIRE) served as independent review for SCE's proposed HFTD changes in D.20-12-030.

[11] D.20-12-030 at 8.

[12] PG&E 2023-25 Approved Wildfire Mitigation Plan R4, January 8, 2024, at 102-104 available at: https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-safety/wildfire-mitigation-plans/2023-wildfire-mitigation-plans/ and PG&E 2023-2025 Wildfire Mitigation Plan R1 Public Attachments, April 6, 2023, available at: https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/pge-2023-wmp-r1-attachments.zip

[13] PG&E 2023-25 Approved Wildfire Mitigation Plan R4, January 8, 2024, at 102.

The Commission relies on HFTD maps that accurately reflect wildfire risk for both operational and planning purposes. For example, the schedules for corrective maintenance actions on overhead electric lines rely on HFTD designations.[14] Also, project selection for expedited undergrounding plans contemplated by Senate Bill 884 (McGuire, Stats. 2022, Ch. 819) are limited to designated HFTDs.[15, 16] Therefore, any undergrounding projects considered in HFRAs would be excluded from SB 884 plans even though the utility has identified these areas as high fire risk.

In support of the Cal Advocates Petition to Modify, the California Municipal Utilities Association noted that significant developments in fire modeling science and data availability have occurred since the adoption of the HFTD map.[17] Moreover, in its previous *Petition for Modification of D.17-12-024* in 2019, SCE stated that "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" and identified a number of factors underlying wildfire risk mapping that are subject to change over time as field conditions change.[18] D.20-12-030 adopted SCE's HFTD changes and noted other risk factors such as "climate influences on moisture and content distributions" and "climatology of fire weather."[19]

With two HFTD PFMs from SCE and the substantial divergence of HFRAs from HFTDs in PG&E's territory, it is evident that utilities have significantly different policies in maintaining HFTD maps. Unfortunately, because not all utilities have updated HFTD

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[14] General Order 95, Rule 18 at: https://www.cpuc.ca.gov/proceedings-and-rulemaking/cpuc-general-orders

[15] Senate Bill 884 (Stats. 2022, Ch. 819) codified as California Public Utilities Code §8388.5 at: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC&sectionNum=8388.5

[16] Public Utilities Code §8388.5(c)(2): "Only undergrounding projects located in tier 2 or 3 high fire-threat districts or rebuild areas may be considered and constructed as part of the program."

[17] *Response of the California Municipal Utilities Association to the Public Advocates Office's Petition for Modification of D.20-12-030, D.17-12-024 and D.17-01-009* at 4, available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M509/K543/509543833.PDF

[18] SCE's 2019 *Petition for Modification of Decision 17-12-024* at 8-10.

[19] D.20-12-030 at 5.

maps, or independently affirmed that no updates are needed, the Commission needs to be proactive to ensure that HFTD maps do not become outdated and unfit for their purpose.[20], [21]

III. CONCLUSION

For the reasons discussed above, the Public Advocates Office respectfully requests that the Commission grant SCE's Petition and adopt a more comprehensive process that independently reviews the accuracy of current HFTDs across California.

Respectfully submitted,

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[20] See Cal Advocates Petition at 9-11 and *Public Advocates Office's Reply to Responses* at 4-7.

[21] D.17-01-009, the Commission's *Decision Adopting a Work Plan for the Development of Fire Map 2*, at 77, at: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M172/K762/172762082.PDF and Cal Advocates Petition at 9-11 and *Public Advocates Office's Reply to Responses* at 4-7.