



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

August 15, 2022

Caroline Thomas Jacobs  
Director, Office of Energy Infrastructure Safety  
California Natural Resources Agency  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

*E-Filed via 2022-WMPs Docket*

**RE: Comments of the Rural County Representatives of California on the SMJU  
2022 Wildfire Mitigation Plan Updates**

Dear Director Thomas Jacobs:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to provide comments on the Small and Multi-Jurisdictional Utility (SMJU) 2022 updates of their respective Wildfire Mitigation Plans (WMPs or Plans); specifically, our comments primarily focus on, and are applicable to, Liberty Utilities and PacifiCorp. RCRC is an association of thirty-nine rural California counties, and our Board of Directors is comprised of elected supervisors from each member county.

RCRC member counties comprise the vast majority of the state's forested lands and high fire hazard severity zones. As such, our communities have borne the majority of destruction caused by high severity wildfires. Safeguarding California's residents from future harm resulting from a utility-caused wildfire event is one of RCRC's primary public policy goals. Our counties and residents are very sensitive to ever-increasing energy costs, especially given communities across California have experienced great financial hardships in attempting to recover from catastrophic wildfire events and in mitigating the risk of consequences of those events, including implementing home hardening measures and maintaining defensible space. As a whole, California has some of the highest electricity cost burdens in the nation and, given there are fewer customers of the SMJUs, wildfire mitigation activities must be holistically feasible.

Given the limited ratepayer base of each respective SMJU, it is essential to ensure that these utilities are targeting the highest risk areas and assets with measures that provide the greatest risk-spend efficiency. While we understand Energy Safety's review and determinations of Wildfire Mitigation Plans do not automatically translate into cost recovery approval at the California Public Utilities Commission (CPUC), it is still staggering that Liberty customers are projected to see their bill increase by 17% (an

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average of \$18.35) in 2022 for wildfire mitigation activities.<sup>1</sup> In comparison, PG&E estimates an average customer increase of 3.7% (an average of \$6.13) in 2022 for wildfire mitigation activities.<sup>2</sup> Given the Memorandum of Understanding between the CPUC and Energy Safety, we encourage both entities to consider and coordinate ratepayer implications across the broad suite of wildfire mitigation activities in a methodical way.

We acknowledge that Liberty Utilities did not meet all its 2021 WMP targets due to the impacts of the Tamarack and Caldor fires, however, we appreciate their responsiveness and swift rebuilding efforts following those incidents. Given limited staff resources, Liberty Utilities has also improved its quality assurance/quality control (QA/QC) protocols for asset inspections,<sup>3</sup> a marked improvement from its 2021 WMP Update. However, questions and concerns remain as to whether its overall grid design and system hardening work scoped for 2022 is not only achievable, but whether its progress is primarily to address their growing backlog or whether it includes new targets. Relatedly, Liberty's Resource Allocation Methodology, as revised on July 15, 2022, does little to explain, let alone improve upon, its labor/operational constraints.<sup>4</sup>

Public Safety Power Shut-off (PSPS) events have been altogether rare in PacifiCorp and Liberty service territories and we applaud their duty to keep the lights on. Unlike PacifiCorp, Liberty does not provide customer resiliency options for its Access and Functional Needs (AFN) customers during a PSPS event, such as portable back-up batteries for Medical Baseline Customers (MBC).<sup>5</sup> Given these customers are unaccustomed to proactive outages, we encourage the SMJUs to be diligent in keeping local government contacts up to date and conducting table-top exercises to ensure a smooth and coordinated event if/when conditions warrant calling a PSPS event as a measure of last resort.

Thank you for the opportunity to comment on the SMJU 2022 Wildfire Mitigation Plan Updates. If you have any questions, please do not hesitate to contact me at [lkammerich@rcrcnet.org](mailto:lkammerich@rcrcnet.org).

Sincerely,



LEIGH KAMMERICH  
Policy Advocate

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<sup>1</sup> Table 3.2-1, page 24, *Liberty Utilities 2022 Wildfire Mitigation Plan Update*, May 6, 2022.

<sup>2</sup> Table 3.2-1, page 42, *PG&E 2022 Wildfire Mitigation Plan Update*, February 25, 2022.

<sup>3</sup> Attachment F, *Liberty Utilities 2022 Wildfire Mitigation Plan Update*.

<sup>4</sup> Page 166, *Liberty Utilities 2022 Wildfire Mitigation Plan Update*, July 15, 2022.

<sup>5</sup> Attachment G, page 9, *Liberty Utilities 2022 Wildfire Mitigation Plan Update*.