

October 26, 2022

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Re: Joint Local Governments' Comments on Draft 2023-2025 WMP Guidelines

Deputy Director Semcer:

The Counties of Marin, Napa, San Luis Obispo, and Sonoma, and the City of Santa Rosa (the Joint Local Governments) submit these comments on the 2023–2025 Draft Wildfire Mitigation Plan Guidelines. Sonoma County's Department of Emergency Management is also providing comments, which are included as Attachment A. The Joint Local Governments appreciate Energy Safety's diligence and clear effort in overseeing and continuously improving the large electric utilities' Wildfire Mitigation Plans. These comments focus primarily on closing the gap between the utilities' mitigation programs on paper and the manner in which the programs are actually implemented, which often falls short of community expectations. In addition to rigorous scrutiny of the utilities' data, metrics, and self-reporting, Energy Safety must ask how well these programs are actually working in practice.

Risk Reduction Objectives

The large utilities should be required to provide the data from the previous calendar year for each performance indicator category to ensure that Energy Safety and stakeholders have an accurate picture of what is happening on the ground, so to speak. The utilities should have the data available for the number of utility-related ignitions, the number of faults and the key drivers for those faults, the number of wires-down incidents, the number of outages from device settings and de-energization events, the average duration of those outages, and the average numbers of customers impacted by the outages.<sup>1</sup> Providing the previous year's impact data will ensure that the utilities' reduction objectives for the coming year have sufficient context to gauge whether the reductions will be meaningful.

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<sup>1</sup> Draft WMP Guidelines, Table 4-1, pp. 14–15.

To the extent that a utility uses a metric other than the actual restoration times or total customer counts to quantify the previous year's impacts, the utility must disclose that it is using a different set of data and explain why it believes the alternative data is appropriate. For example, PG&E prefers to measure the impacts of its fast-trip outages with the Customer Average Interruption Duration Index rather than the total restoration time.

### Long-Term Outlooks for Mitigation Programs

The Draft Guidelines do not appear to require the utilities to set targets for phasing out certain mitigation programs over the three- or ten-year planning horizons.<sup>2</sup> While some mitigation measures, such as vegetation management, will be ongoing, there should be a point at which system hardening results in permanent changes to the current portfolio of mitigation activities. For example, system hardening should change de-energization thresholds and significantly reduce, if not obviate, the need for fast-trip outages. It is not apparent from the Draft Guidelines whether the utilities will be required to scrutinize their programs rigorously and make commitments to scale them back as the cumulative effects of system hardening become more widespread.

### Project Management Controls for Mitigation Programs

The Draft Guidelines call for the utilities to provide information on project management controls to confirm the effectiveness of mitigation initiatives, such as tracking the number of protective equipment and device setting-caused de-energizations that had the potential to ignite a wildfire.<sup>3</sup> Avoiding potential ignitions is an important metric for gauging a program's effectiveness, but it cannot be the only, or even the primary, metric. Public safety is determined by more than just avoided ignitions. The utilities must also be required to provide a discussion of the impacts to customers as a result of those measures; if customers are experiencing unintended impacts or if a program is causing widespread negative impacts, the program must be scrutinized and recalibrated to reduce those impacts.

### Grid Design and System Hardening

The utilities' discussion of its grid design and system hardening for each of its wildfire mitigation initiatives should include a discussion of any trade-offs between mitigation programs as a result of the grid design and system hardening.<sup>4</sup> For example, if the increased deployment of fast-trip settings is reducing the planned scope of work to facilitate de-energization events, the utility should be required to address that. Conversely, if there are mitigation programs that should reduce the need for other measures, such as increased deployment of covered conductor reducing the need for certain vegetation management activities or fast-trip settings, that

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<sup>2</sup> Draft WMP Guidelines, Table 7-3, pp. 85–86. While Table 7-3 is an exemplar list of the types of activities and targets the utilities must include in their WMPs, there does not appear to be a requirement in the guidelines to identify mitigation initiatives that can be greatly reduced or discontinued as a result of system hardening.

<sup>3</sup> Draft WMP Guidelines, p. 79.

<sup>4</sup> *Id.* at p. 95.

relationship should also be addressed. Discussing the interrelations between mitigation programs will help Energy Safety and stakeholders assess whether the programs are scoped appropriately and whether they may be having larger on-the-ground impacts than intended.

### Equipment Settings to Reduce Wildfire Risk

The Draft Guidelines direct the utilities to provide a narrative analysis of the reliability and safety impacts of equipment settings.<sup>5</sup> The Guidelines should be clarified to require a narrative from the utility that includes more than a report of ignition reductions and a statement that it is aware that losing power is disruptive to customers. The utilities should be required to identify the type and number of critical facilities on setting-enabled circuits; address whether and to what extent the settings are enabled during high-heat and low-temperature events, including times of year when average temperatures can present a safety risk if a person is without power; and address the impacts of multiple or regular outages on the same circuit. The utilities should also be required to provide a plan to harden frequently-impacted circuits so that outage settings are no longer the primary means of wildfire risk reduction.

Requiring a complete accounting of the situation on the ground, so to speak, is necessary because reliability and safety impacts cannot be assessed using only average restoration times and avoided ignitions. PG&E's current fast-trip outage program illustrates the problem with focusing on a limited number of metrics. While the utility has reduced its total number of reportable ignitions by implementing the fast-trip program, that reduction has come at a considerable cost to its customers. As of September 30, approximately 1.75 million customer accounts, or 3.5 to 5.25 million individuals, have lost power in 2022 due to fast-trip settings; 473,062 customer accounts lost power in September alone. The outages year-to-date have lasted an average of six hours, which is enough time to lose a refrigerator full of food and an entire work or school day. In rural communities, outages can last days, not hours.

In addition to the raw data, which is sobering enough on its own, impacted communities are seeing serious public safety risks created by the outages. Wireless and wireline telecommunications services regularly fail during fast-trip outages, notwithstanding the CPUC's backup power mandates, which leaves residents unable to call 911, receive emergency alert notifications, or access basic information. This is not a theoretical safety issue: fast-trip outages occurred while the Mosquito Fire was spreading rapidly, which put them at risk of missing evacuation warnings. Impacted customers lose the ability to pump well water, which can harm people, livestock, and crops. Medically vulnerable customers cannot plan for the outages to charge their devices or backup batteries in advance, nor can they pre-arrange transportation to an energized location; they must also live with the stress created by the constant threat of suddenly losing power. And close to 250,000 customer accounts lost power during the historic heat dome event during the first 10 days of September, which shattered heat records and posed a serious threat to public safety, even where the power remained on.

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<sup>5</sup> Draft WMP Guidelines, p. 101.

If equipment settings are to be a meaningful wildfire risk reduction tool, the utilities and their regulators need to look at the full spectrum of impacts and benefits. These programs must be rigorously analyzed and calibrated to ensure that the harm-to-benefit ratio is actually reasonable.

### Vegetation and Fuels Management

The Draft Guidelines should be clarified to require that the utilities report the number of trees felled in the previous calendar year and the number of properties on which the utility left slash in place after vegetation management work.<sup>6</sup> The utilities should also be required to report the number of trees removed at the landowner's request, and the number of landowner removal requests that the utility did not grant. The Guidelines should also require the utilities to assess the fire risk created by leaving the now-dead trees and slash in situ.

### Community Outreach and Engagement

Community outreach is an area of the utilities' wildfire mitigation programs where it is particularly important for Energy Safety to ask how the utilities' efforts are actually working in practice.<sup>7</sup> Community engagement must go beyond informational emails, flyers, and canned presentations at public meetings. The utilities' reporting should include constructive feedback, requests for changes, and criticism of unsatisfactory aspects of the outreach programs provided to the utilities by customers and public safety partners. The utilities should be required to provide a plan to address the aspects of their programs that are not meeting community needs. The Draft Guidelines call for a high-level discussion of various customer groups' interests or concerns,<sup>8</sup> and for the utilities' description of gaps or limitations in collaborating on local wildfire mitigation planning,<sup>9</sup> but those requirements do not appear to include feedback from the communities with whom the utilities are meant to be collaborating. History has shown that the utilities tend to report a more successful and functional picture of their community outreach efforts than the community feels is warranted. Requiring the utilities to report customer and community feedback should help provide a more accurate view of the situation on the ground.

Respectfully yours,

DOWNEY BRAND LLP



Megan J. Somogyi

cc: WMP Docket Service List

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<sup>6</sup> See Draft WMP Guidelines, pp. 118–123; Section 8.2.3.

<sup>7</sup> See *id.* at pp. 194–208.

<sup>8</sup> *Id.* at pp. 201, 205.

<sup>9</sup> *Id.* at p. 208.

**ATTACHMENT A**

Office of Energy Infrastructure Safety  
 2023-2025 Wildfire Mitigation Plans docket (#2023-2025-WMPs)  
 Draft 2023-2025 Wildfire Mitigation Plan Guidelines - Package 1: Comments from the County of Sonoma Department of Emergency Management

Page	Section	Item	Current Language	Proposed Language	Comment
13	4.2 Risk Reduction	Table 4-1	“No. of outages caused by protective equipment and device settings - Reduce by x%.”	“No. of outages caused by protective equipment and device settings - Reduce by x%. <b>AND No. of circuits that experienced more than three outages in 2021 or 2022 due to early fault or fast-trip settings”</b>	<p>The County of Sonoma supports this performance measure.</p> <p>The increased use of early fault or “fast-trip” settings is causing significant impacts to the communities that we represent, and the voluminous and repeated outages create serious public safety risks. These outages often occur during high fire hazard conditions and weather events causing wireless and landline communications networks to frequently go down which leaves people unable to call for help, receive emergency warning and alert messages, or get basic information as was the case in this year’s Mosquito Fire.</p> <p>For circuits that experienced more than three outages in 2021 or 2022, utilities must communicate to CPUC and impacted local governments a plan and timeframe for reducing the number and frequency of outages on that circuit, including whether the measures will include line undergrounding, installation of covered conductor, increased vegetation management, or other measures.</p>

Page	Section	Item	Current Language	Proposed Language	Comment
14	4.2 Risk Reduction	Table 4-1	“Average hours of an outage caused by protective equipment and device settings - Reduce to less than x hours”	“Average hours of an outage caused by protective equipment and device settings and # of outages that exceed the average by more than 50% - Reduce average outage to less than x hours”	The County of Sonoma supports this performance measure if it begins to address the scope of outages that are severe in duration. By way of example, PG&E’s new fast-trip outage program has already quietly exceeded the number of customers impacted by PG&E’s largest 2019 PSPS event and is close to exceeding the total number of customers impacted by all of PG&E’s 2019 PSPS events. Fast-trip outages have lasted an average of six hours which is enough time to lose a refrigerator full of food and an entire work or school day, which many impacted households and businesses cannot afford, particularly when the outages occur repeatedly. It must also be noted that in many rural communities, the outages can last days.
15	4.2 Risk Reduction	Table 4-1	“Average no. of customers affected per outage caused by protective equipment and device settings”	<b>“Average no. of customers affected per outage caused by protective equipment and device settings and NO. of medical baseline customers, critical life support customers, critical infrastructure providers, and public safety partners who may be impacted on the circuits where protective settings have been implemented”</b>	The County of Sonoma supports this performance measure and the ongoing effort approach to segment distribution circuits however the real impacts varying depending not on how many but on who actually loses power.

Page	Section	Item	Current Language	Proposed Language	Comment
75	7.1.4	Mitigation Selection Process	After the electrical corporation creates a comprehensive prioritized list of risks (Section 7.1.3), the electrical corporation must then identify potential mitigation strategies. It must also evaluate the benefits and drawbacks of each strategy at different scales of application (e.g., circuit, circuit segment).	After the electrical corporation creates a comprehensive prioritized list of risks (Section 7.1.3), the electrical corporation must then identify potential mitigation strategies. It must also evaluate the benefits and drawbacks of each strategy at different scales of application (e.g., circuit, circuit segment, <b>system-wide</b> ).	The drawbacks of each mitigation strategy should also account for system-wide effects. For example, a large, system-side weather event bringing high winds could not only require initiation of PSPS, the winds could trigger fast-trip outage across broad areas. The scope of these outages combined with the need to address actual system damages could profoundly delay inspection and restoration times.
77	7.1.4.2	Potential Mitigation Initiative Evaluation and Selection	“The electrical corporation must describe its processes and procedures used to evaluate and select mitigation initiatives to reduce both wildfire and PSPS risk.”	“The electrical corporation must describe its processes and procedures used to evaluate and select mitigation initiatives to reduce both wildfire, PSPS, <b>and other public safety risks.</b> ”	



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77	7.1.4.2	Potential Mitigation Initiative Evaluation and Selection	The electrical corporation must describe its processes and procedures used to evaluate and select mitigation initiatives to reduce both wildfire and PSPS risk. This discussion must include the following: ...”	Add a third bullet: <b>“For each mitigation initiative, identify potential negative impacts to public safety. (ex. PSPS may result in loss of power to wireline and wireless broadband infrastructure). Address the performance of the mitigation initiative potential system-wide hazards such as high-wind event or earthquake.”</b>	In assessing potential mitigation initiatives, the electrical corporations must also identify and assess the potential negative impacts on public safety. The governing paradigm cannot be that customers are safest when the power is off.
90	8.1.1.1	Table 8-2	“Enable early fault detection capabilities for all circuits in HFTD areas”	“Enable early fault detection capabilities for all circuits in HFTD areas <b>when safe to do.</b>	Using the widespread adoption of early fault detection capabilities as an example here of a 10-year objective would seem to indicate an apparent preference by OEIS for this mitigation strategy. However, the secondary impacts of widespread use of early fault settings needs to be assessed before it becomes operational objective.
94	8.1.1.3	Table 8-5	“Equipment-caused outages”	“Equipment-caused outages <b>by category of cause</b> ”	Currently, fast-trip settings are categorized as “equipment caused” outages. However, this performance metric should distinguish between regular equipment failures, etc. and category should breakout fast-trips as these are not truly caused by equipment – they are caused by the voluntary temporary setting on the equipment.

Page	Section	Item	Current Language	Proposed Language	Comment
101	8.1.8.1	Equipment Settings to Reduce Wildfire Risk	<p>“For each of the above, the electrical corporation must provide a narrative on the following:</p> <ul style="list-style-type: none"> <li>• Settings to reduce wildfire risk</li> <li>• Analysis of reliability/safety impacts for settings the electrical corporation uses</li> <li>• Criteria for when the electrical corporation enables the settings”</li> </ul>	<p>“For each of the above, the electrical corporation must provide a narrative on the following:</p> <ul style="list-style-type: none"> <li>• Settings to reduce wildfire risk</li> <li>• Analysis of reliability/safety impacts for settings the electrical corporation uses <b>including how the settings will perform in large, system-side events such as high winds or earthquake</b></li> <li>• Criteria for when the electrical corporation enables the settings”</li> </ul>	<p>The drawbacks of this strategy should also account for system-wide effects. For example, in a large, system-side weather event, would high winds trigger fast-trip settings? Or in the event of a major regional earthquake?</p> <p>The scope of these outages combined with the need to address actual system damages could profoundly delay inspection and restoration times and compound the effects of the primary event (ex. no power for gas stations following an earthquake).</p>

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201	8.5.2	Table 8-57	Add new row to table for each group in the suggested language:	<p><b>“For medical baseline customers, critical life support customers, critical infrastructure providers, and public safety partners who may be impacted on the circuits where fast-trip settings have been implemented identify outreach has been provided to each of those groups, actions taken to support these customers and minimize the impacts of outages, how the electrical corporation is ensuring customers who rely on electricity to maintain necessary life functions will be able to weather the full duration of a fast-trip outage.”</b></p>	The long-term and cumulative safety hazard of fast trips settings remains to be determined. Safeguard should be put into place until such time as these settings are determined to have no impact on vulnerable and AFN populations.

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202	8.5.2	Community Partners	“Description of the various outreach and education awareness programs (i.e., campaigns, informal education, grant programs, participatory learning) that the electrical corporation implements before, during, and after wildfire, vegetation management, and PSPS events.”	“ Description of the various outreach and education awareness programs (i.e., campaigns, informal education, grant programs, participatory learning) that the electrical corporation implements before, during, and after wildfire, vegetation management, and PSPS events <b>including efforts to engage with partners in developing and exercising these programs.</b> ”	Electrical corporations must coordinate with locals to ensure that communications and notifications are going to the right individuals within the local government, in the same manner as PSPS protocols. Electrical corporations need to de-conflict overlapping or contradictory messaging being provided by their public safety and government affairs staff (e.g., public safety is often asked to keep information confidential, while government affairs simultaneously sends information to elected and appointed officials).
205	8.5.4	Table 8-60		Add a new second row following “Local County Resource Agency”: “ <b>Local Emergency Management Agency - WMP - 2023 version - Engaged with refining and exercising content of the WMP and information sharing tools (ex. secure website portal)</b> ”	Electrical corporations must engage and directly coordinate with local emergency managers to identify and establish thresholds/triggers for push notifications for fast-trip outages (e.g., number of customers impacted, multiple simultaneous outages, outages extending beyond target restoration goals, etc.). Outage notifications must be pushed to emergency managers during periods of high fire threat weather events to allow locals to monitor the potential loss of emergency alert and warning capabilities.