

November 4, 2022

Wildfire Safety Advisory Board
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Dear Members of the Wildfire Safety Advisory Board:

Subject: Comments of the Los Angeles Department of Water and Power on the Wildfire Safety Advisory Board's Draft Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives

The Los Angeles Department of Water and Power ("LADWP") appreciates the positive feedback and recommendations from the Wildfire Safety Advisory Board ("WSAB") on its 2022 Wildfire Mitigation Plan ("WMP"). LADWP recognizes the importance of reducing wildfire risks within its service territory and values the WSAB's insights and opinions. LADWP anticipates that time will be needed beyond the proposed 2023 milestones to fully evaluate a number of the WSAB's recommendations and make feasible improvements to LADWP's WMP and associated activities. Furthermore, LADWP is actively exploring enhancement to our wildfire mitigation activities and looks forward to frequent engagements with the WSAB.

LADWP hereby submits the specific comments below in response to the WSAB's *Draft Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives*. LADWP looks forward to continued collaboration with the WSAB as we move together towards our common goal of minimizing wildfires across California.

Comments from LADWP

LADWP is filing these comments to provide input on: (1) Independent Evaluations; (2) Vegetation Management; and (3) WSAB Advisory Guidance to Each Publicly Owned Utility ("POU") Based on 2022 WMP.

1. Section 3 Part B: Independent Evaluations

Language from Draft Guidance Advisory Opinion:

The WSAB recommends that IEs review the 2023 comprehensive revision WMPs and provide an analysis that goes beyond simply documenting compliance with the statute to recommend wildfire mitigation changes or improvements that will improve the wildfire risk profile of the utility, if applicable. The WSAB also encourages documentation of IE recommendations, WMP changes, and a secondary IE review and attestation that recommended changes have been considered and result in the conclusion that the utility's WMP meets (or exceeds) statutory requirements (a practice seen in some of the POU IEs and WMPs).

LADWP's Comment:

LADWP believes the recommendation for Independent Evaluators to provide an analysis that goes beyond simply documenting compliance with the statute to recommending wildfire mitigation changes or improvements that will improve the wildfire risk profile of the utility to be subjective. There could be more than one way to mitigate risk and it should be left up to the utility to determine the most suitable mitigation given each utility's unique circumstances.

Additionally, LADWP believes the recommendation for POUs to obtain a secondary independent evaluation goes above and beyond the statutory requirement. A secondary review would be overly burdensome and would create a timing challenge in meeting the statutory deadline given the already lengthy development process for a comprehensive update to the WMP.

2. Section 3 Part E: Vegetation Management

Language from Draft Guidance Advisory Opinion:

The WSAB encourages the working group effort to examine vegetation management practices to explore the risks of invasive annual grasses that extend across the State and focus on ecologically relevant replanting as opposed to the short-run simple practice of relying on greater clearances.

LADWP's Comment:

LADWP believes the recommendation to focus on replanting in lieu of utilizing greater clearance distances around equipment may not be feasible and is beyond a POU's scope of vegetation management. It also exceeds other regulatory requirements related to vegetation management found in the California Public Utilities Commission ("CPUC") General Order ("GO") 95 and the North American Electric Reliability Council ("NERC") Reliability Standard, FAC-003-4. Furthermore, utilizing greater clearances is recognized by the industry as a vegetation management best practice.

3. Appendix 3: Guidance Advisory Opinion Specific to Each POU Based on 2022 WMP

Language from Draft Guidance Advisory Opinion:

The WSAB is still looking for better information about whether community resources are available for displaced customers in the event of a wildfire evacuation and the status of resource centers and logistical planning for such during a potential PSPS event.

LADWP's Comment:

LADWP would like to reiterate that it does not conduct pre-emptive Public Safety Power Shutoff ("PSPS") events. LADWP only executes its de-energization protocols on a per incident basis (e.g. during a wildfire) if deemed necessary based on safety and reliability issues. Evacuation and availability of community resources would be coordinated by the appropriate city or county agencies.

4. Conclusion

LADWP appreciates the opportunity to file these comments to provide input on: (1) Independent Evaluations; (2) Vegetation Management; and (3) WSAB's Guidance Advisory Opinion specific to LADWP.

LADWP appreciates the commendations and recommendations by the WSAB in its *Draft Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives*. LADWP looks forward to collaborating with the WSAB in the future and maintaining its goal of minimizing wildfire risks within our service territory.

Sincerely,

Simon Zewdu
Director of Power Transmission Planning, Regulatory, and Innovation Division
Los Angeles Department of Water and Power
111 North Hope Street, Room 819
Los Angeles, California 90012
(213) 367-2525
Simon.Zewdu@ladwp.com