

# SAFETY REQUIREMENTS ADDRESSING INCREASING WILDFIRE RISK

**Public Workshop**



Click the links to access the recording  
of this workshop:

[Day 1 \(July 13<sup>th</sup>\)](#)

[Day 2 \(July 14<sup>th</sup>\)](#)



actionable sustainability intelligence®



# SAFETY BRIEFING

**Take care of your posture** and sit in a comfortable position

**Take regular breaks** stretch, hydrate, and rest your eyes

**Know the emergency exits and procedures** in your physical location should the need arise

**Keep emergency contact information readily available**

Be prepared for **earthquakes**



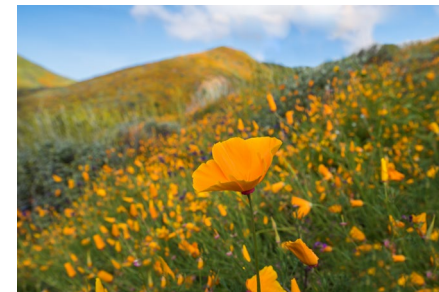
**SAFETY FIRST**



# HOW TO PARTICIPATE

If you wish to provide input to the discussion:

- Press the “raise hand” button on Zoom, participants will be unmuted in order of hands raised
- Dial-in participants need to press #2 to raise hand
- Use Zoom’s Q&A feature to provide input.



# OPENING REMARKS

**Caroline Thomas Jacobs**, Director,  
Office of Energy Infrastructure Safety

**Darcie Houck**, Commissioner,  
California Public Utilities Commission





# SAFETY REQUIREMENTS TO ADDRESS INCREASING WILDFIRE RISK FROM CLIMATE CHANGE AND AGING INFRASTRUCTURE

Lucy Morgans, Program Manager,  
Electrical Safety Policy Division, Office of Energy  
Infrastructure Safety

# AGENDA OVERVIEW

## DAY 1 – JULY 13

9:30 a.m. – 9:45 a.m.	Welcome and Opening Remarks
9:45 a.m. – 10:00 a.m.	Project Overview
10:05 a.m. – 11:05 a.m.	Local Conditions
11:15 a.m. – 12:05 p.m.	Situational Awareness; Emergencies and Disasters
12:05 p.m. – 1:05 p.m.	Lunch
1:05 p.m. – 1:50 p.m.	Risk Assessment and Modeling
2:10 p.m. – 3:50 p.m.	Vegetation Management
4:00 p.m.	End of Day 1



# OBJECTIVES

## Facilitate Stakeholder Feedback

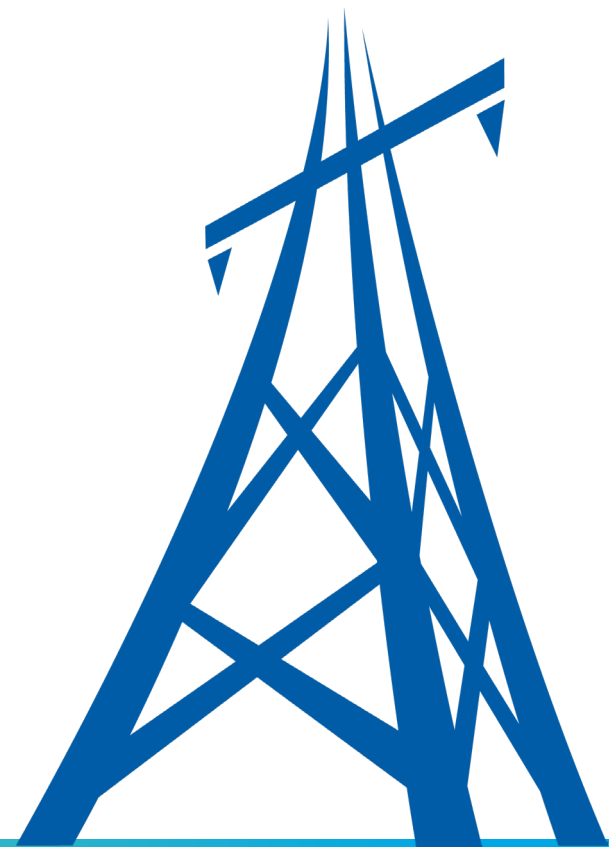
- Listen, understand, and consider the perspectives and insights of our stakeholders

## Promote Public Engagement

- Have a collaborative discussion to explore recommendations for safety regulations to reduce utility wildfire ignitions and the effects of climate change and aging infrastructure

## Enhance Communication and Transparency

- Provide clear feedback and participate in an open dialogue



# INTRODUCTION TO WILDFIRE SAFETY REGULATORY REQUIREMENTS REVIEW

Chinmoy Saha, Green Grid Inc.

# CAL FIRE INTRODUCTION

Jeff Fuentes

Division Chief – Utility Wildfire Mitigation

CAL FIRE

# Utility Wildfire Mitigation

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# In State Responsibility Area

## Investor-Owned Utilities

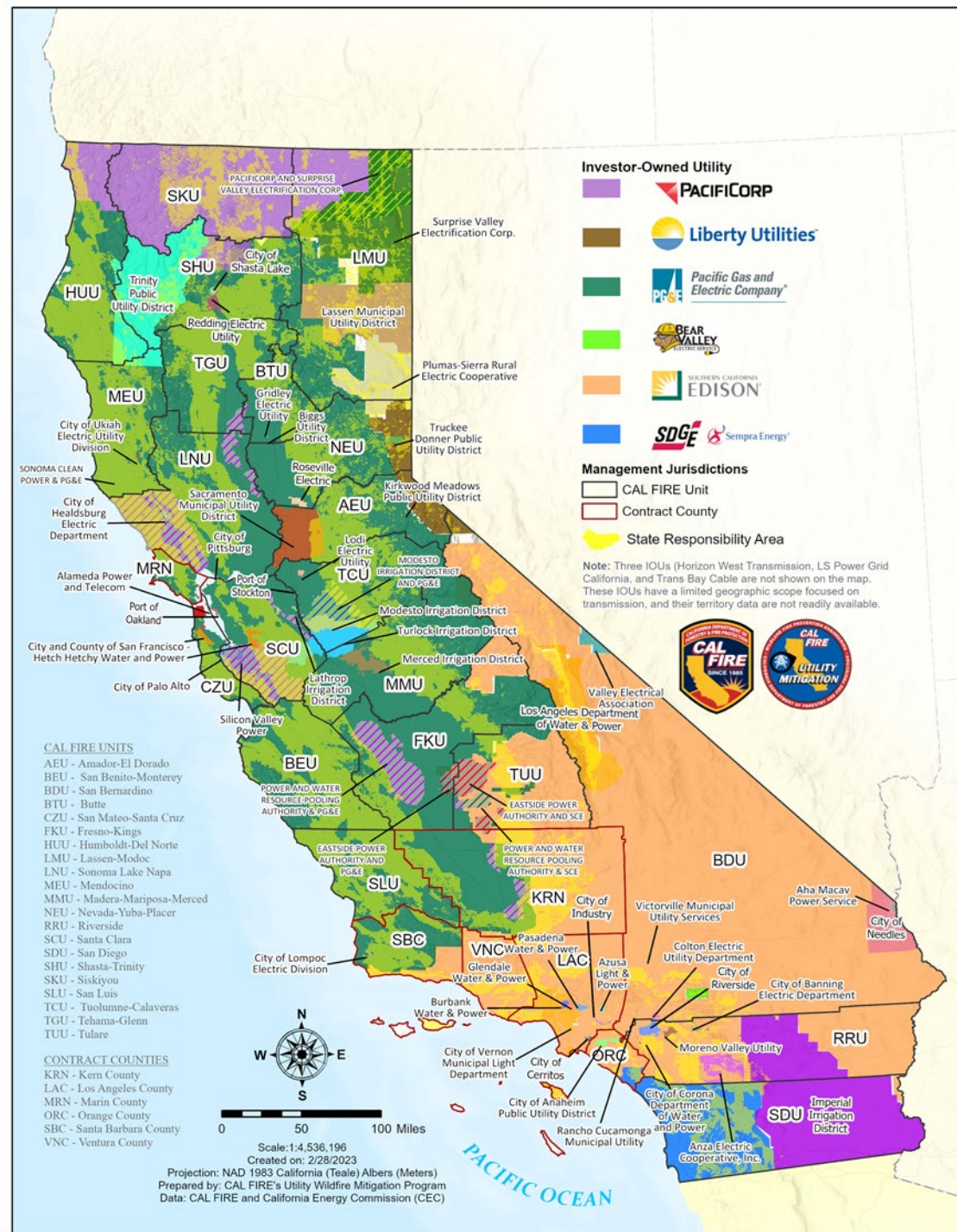
- PG&E
- SCE
- SDG&E

## Small Multi-Jurisdictional Utilities

- PacifiCorp
- Bear Valley
- Liberty

## Publicly Owned/Cooperative Utilities

- 30+ Utilities





# Electrical Power Ignitions

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On average 10% of Wildland Fires in State Responsibility Area's are Electrical Power Caused\*



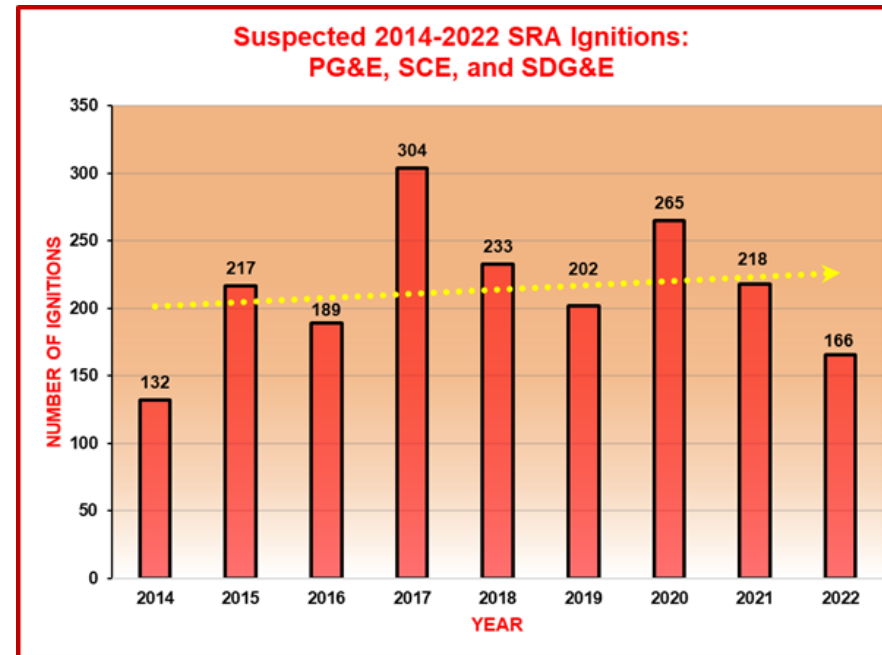
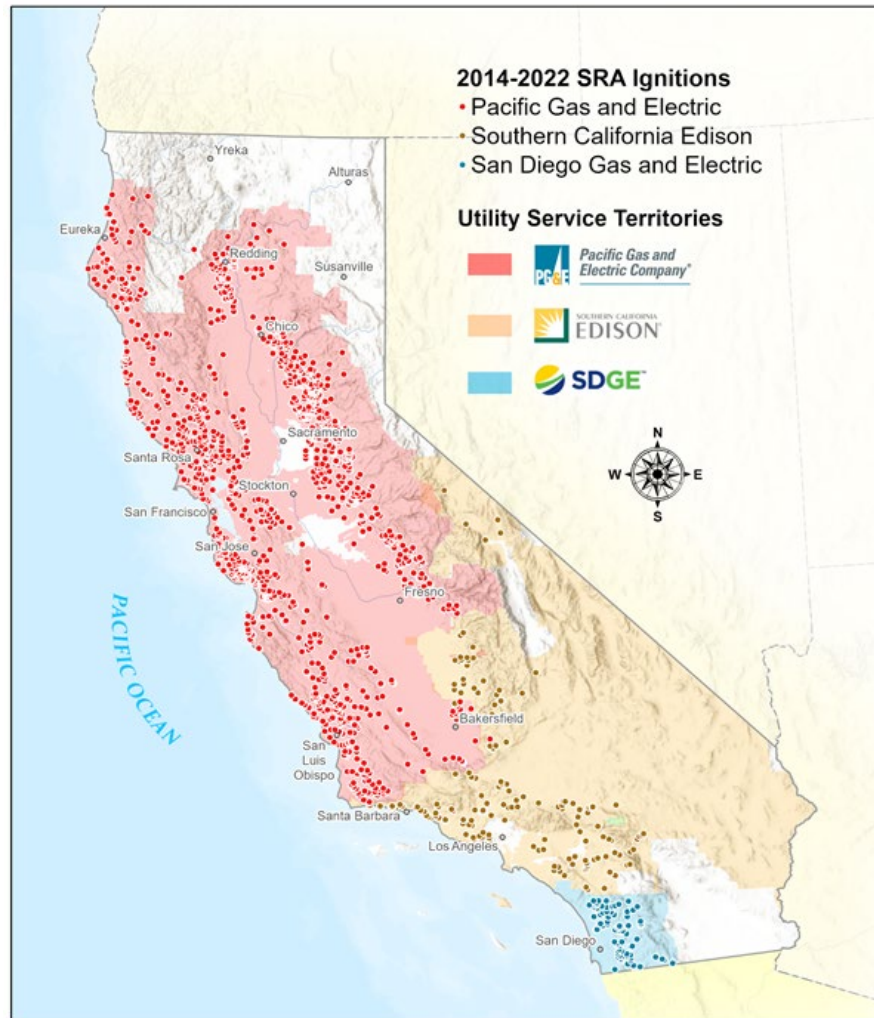
Account for:

- 6 of the Top 20 Destructive California Wildfires
- 3 of the Top 20 Largest California Wildfires
- 3 of the top 20 Deadliest California Wildfires





# Investor-Owned Utility Ignitions 2014-2022



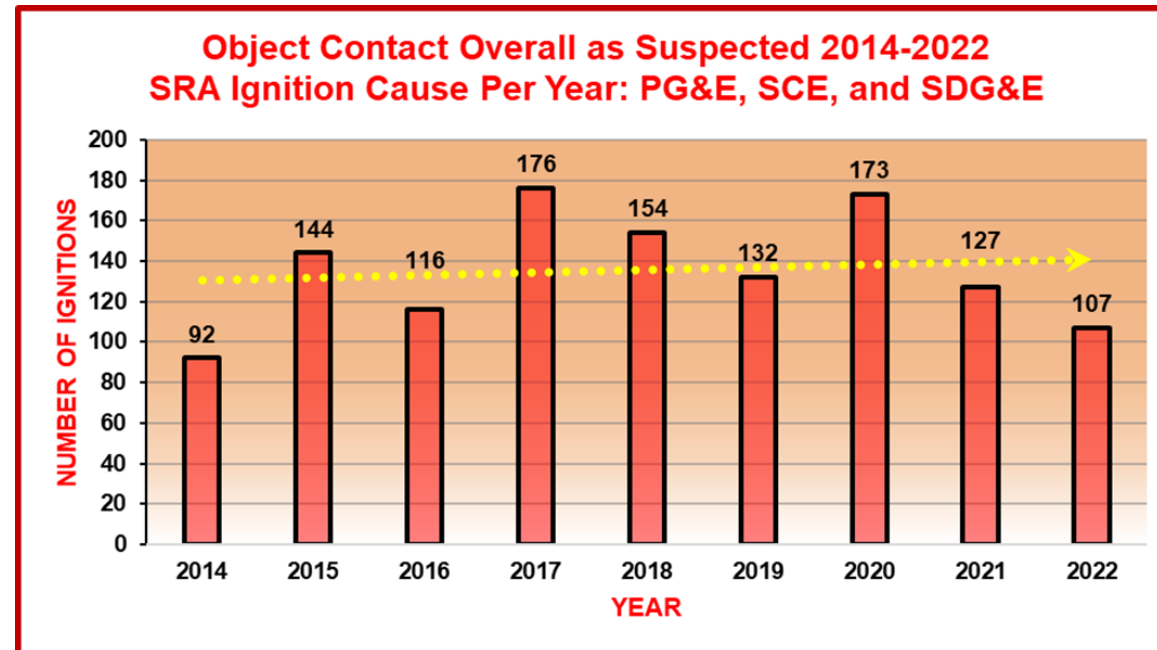
Ignition data based on annual CPUC Reportable Ignitions from 2014-2022 in the State responsibility Area (SRA)



# Contact from Object

Over 60% of utility-related ignitions are attributed to Contact from Object:

- Vegetation: 36%
- Animal: 13%
- Vehicle: 9%
- Balloon: 3%



Based on annual CPUC Reportable Ignitions from 2014-2022 in the State responsibility Area (SRA)





# Vegetation Contact

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Tree hazards to powerlines or other electrical equipment





# Animal Contact





# Vehicle Contact

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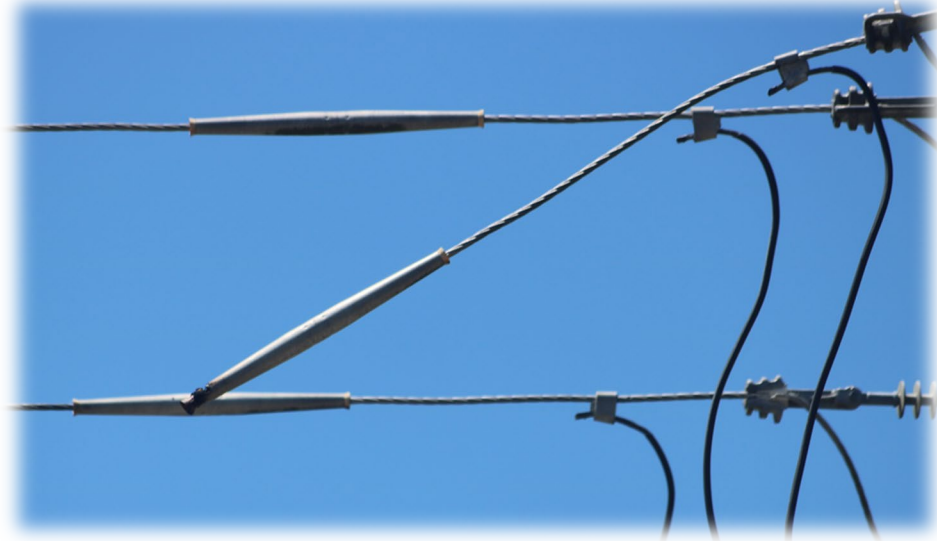
Vehicles contacting Power poles cause ignitions



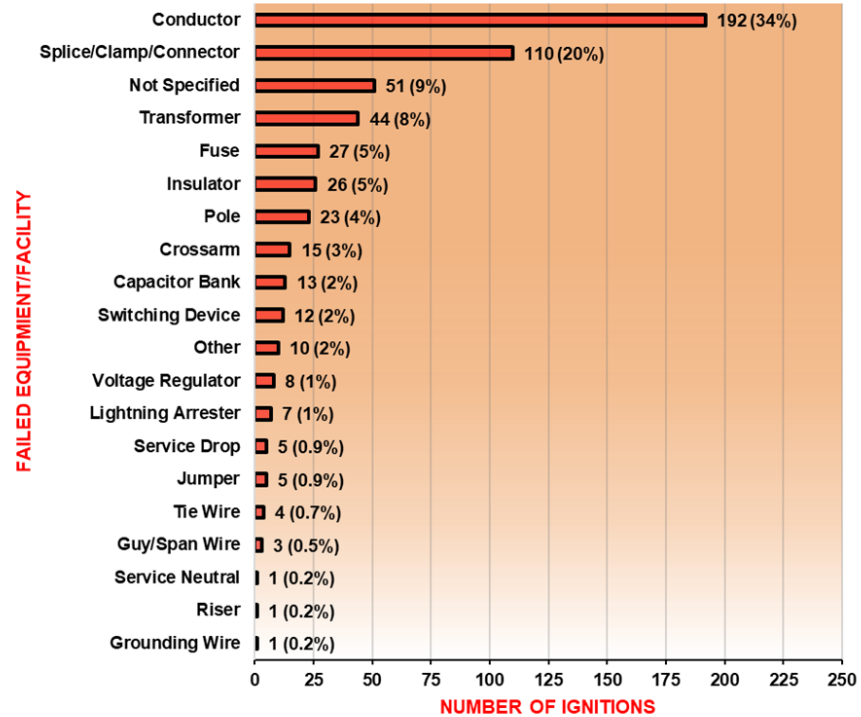


# Powerline Equipment

29% of the total utility-related ignitions in the SRA are powerline equipment related



**Suspected 2014-2022 SRA Equipment/Facility Failure Ignition Causes: PG&E, SCE, and SDG&E**

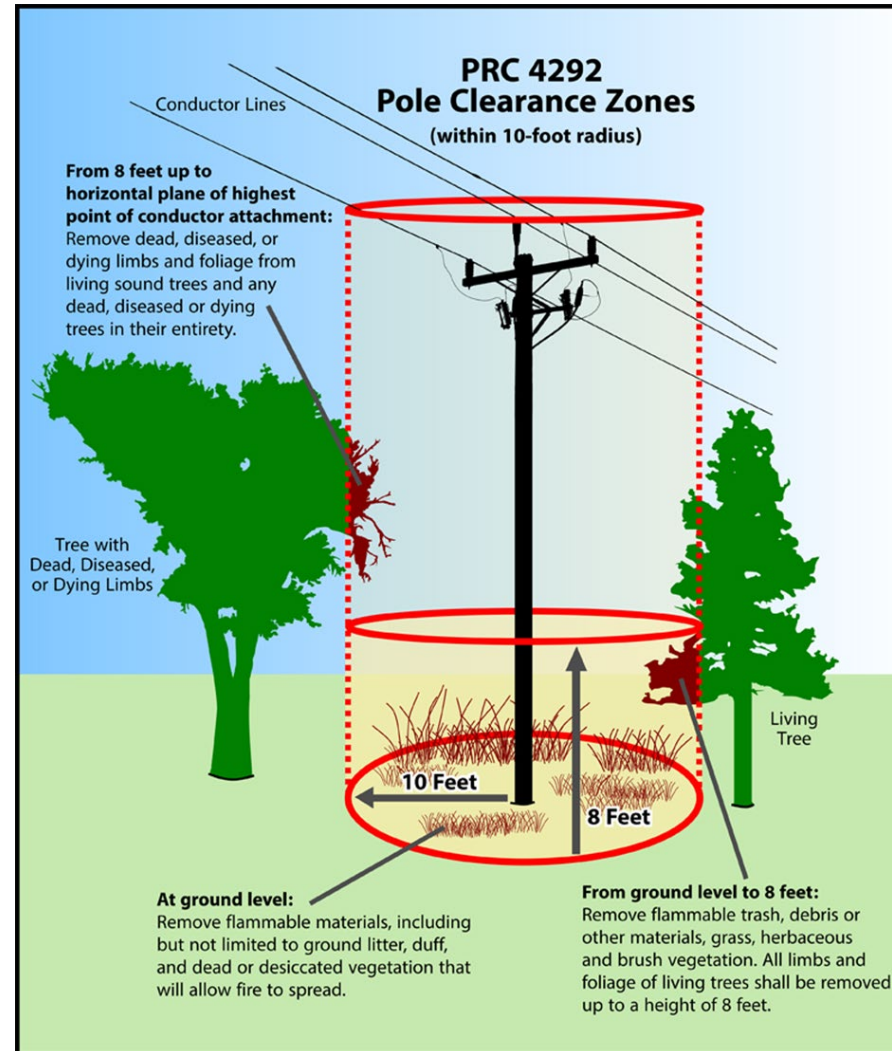






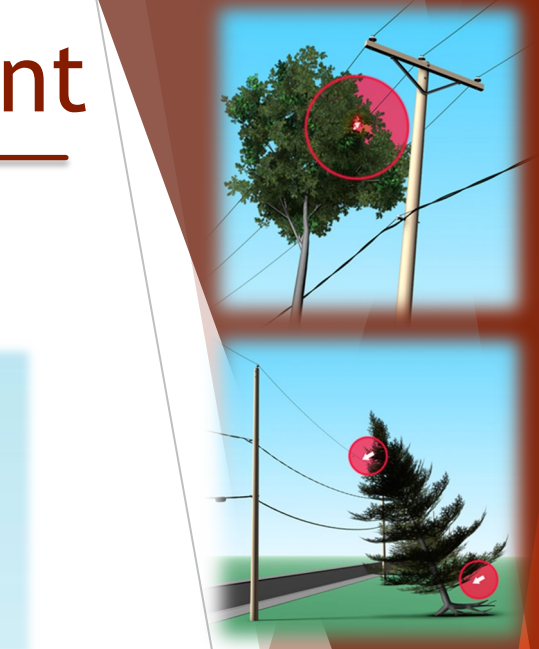
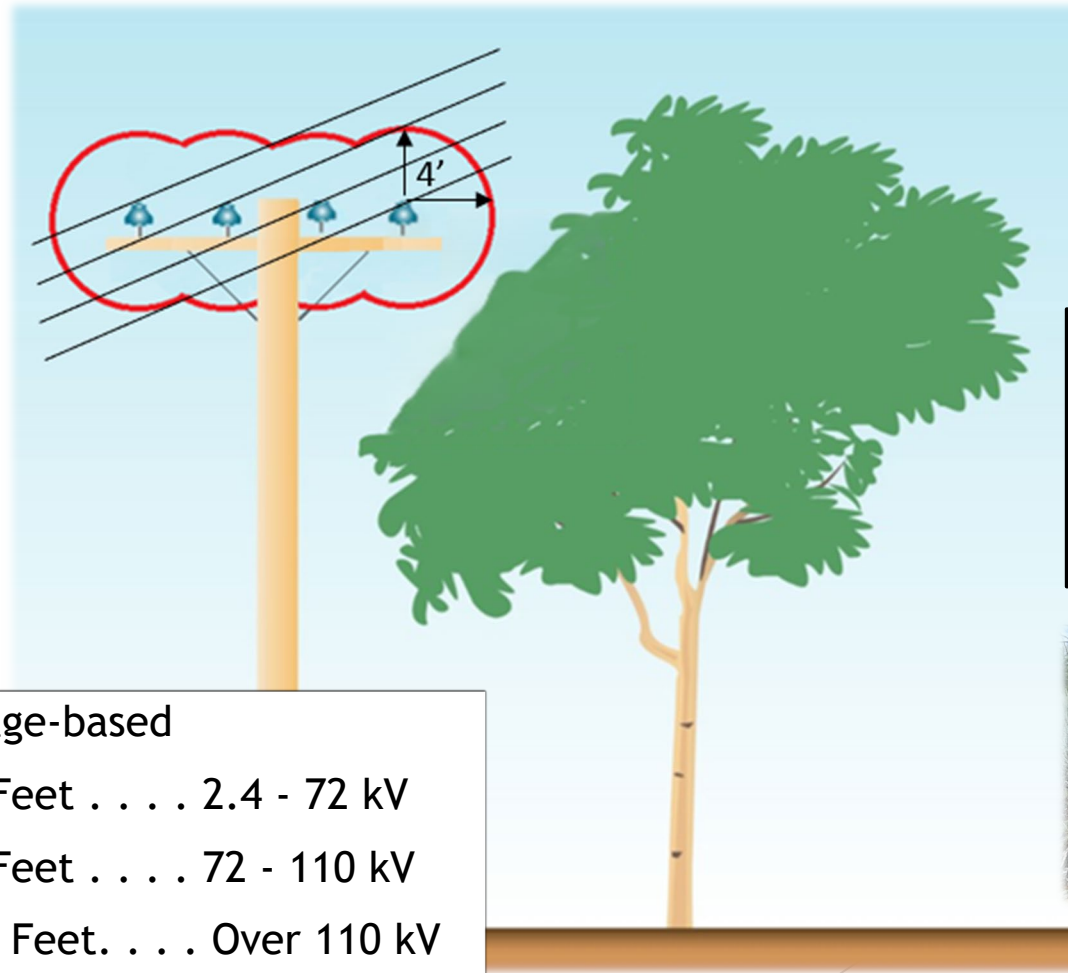
# Vegetation Management

## Public Resource Code (PRC) 4292 Pole Clearance



# Vegetation Management

Public Resource Code (PRC) 4293  
Minimum Conductor Clearances



Dead trees, old decadent or rotten trees, trees weakened by decay or disease and trees or portions thereof that are leaning toward the line which may contact the line from the side or may fall on the line shall be felled, cut, or trimmed so as to remove such hazard.

- Voltage-based
- 4 Feet . . . . 2.4 - 72 kV
  - 6 Feet . . . . 72 - 110 kV
  - 10 Feet. . . . Over 110 kV





# CA State Responsibility Area (SRA) vs. CPUC HFTD

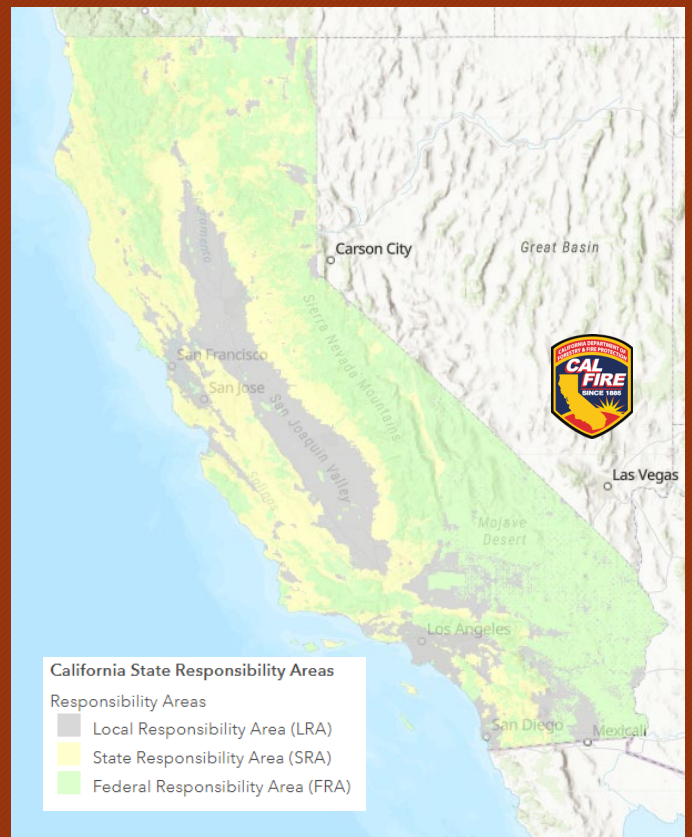
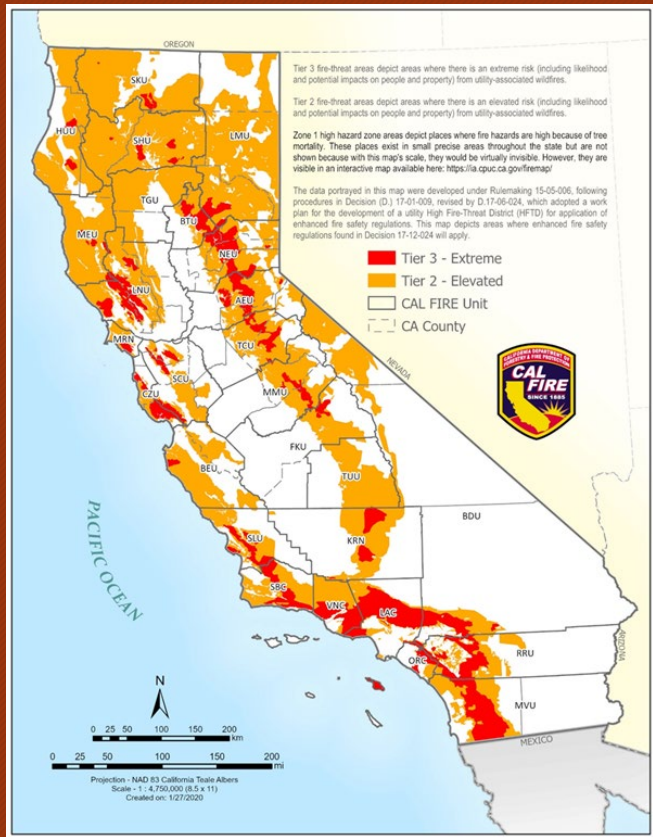
## High Fire Threat Districts (HFTD)

Total Acres of HFTD  
**45,000,000**

48% of HFTD acres are within the SRA  
**21,575,440**

52% of HFTD acres are outside of the SRA  
**23,437,572**

## CA State Responsibility Area



# Jeff Fuentes

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Assistant Chief  
CAL FIRE - Utility Wildfire Mitigation  
[Jeff.Fuentes@fire.ca.gov](mailto:Jeff.Fuentes@fire.ca.gov)



# LOCAL CONDITIONS

Andre Lai

Spatial Data Analyst, B.S. (Geography-GIS)

Green Grid Inc.

# LOCAL CONDITIONS

## Background: Types

### Geophysical

- Topography, soil type, and geology

### Climatic

- Temperature, precipitation, humidity, wind, and extreme weather events

### Environmental

- Local vegetation and wildlife

### Demographic

- Population, land use patterns, and urban development trends



*Image source: Loeffler, B. (2021, January 26). Micro-climates.  
<https://blog.iceslicer.com/microclimates>*

# LOCAL CONDITIONS

## Background: Dynamics of Wildfire Spread

### Climatic Factors

- High temperatures
- Low humidity
- Strong winds
- Red Flag Warning days

### Geographical Factors

- Wind flow
- Slope
- Vegetation

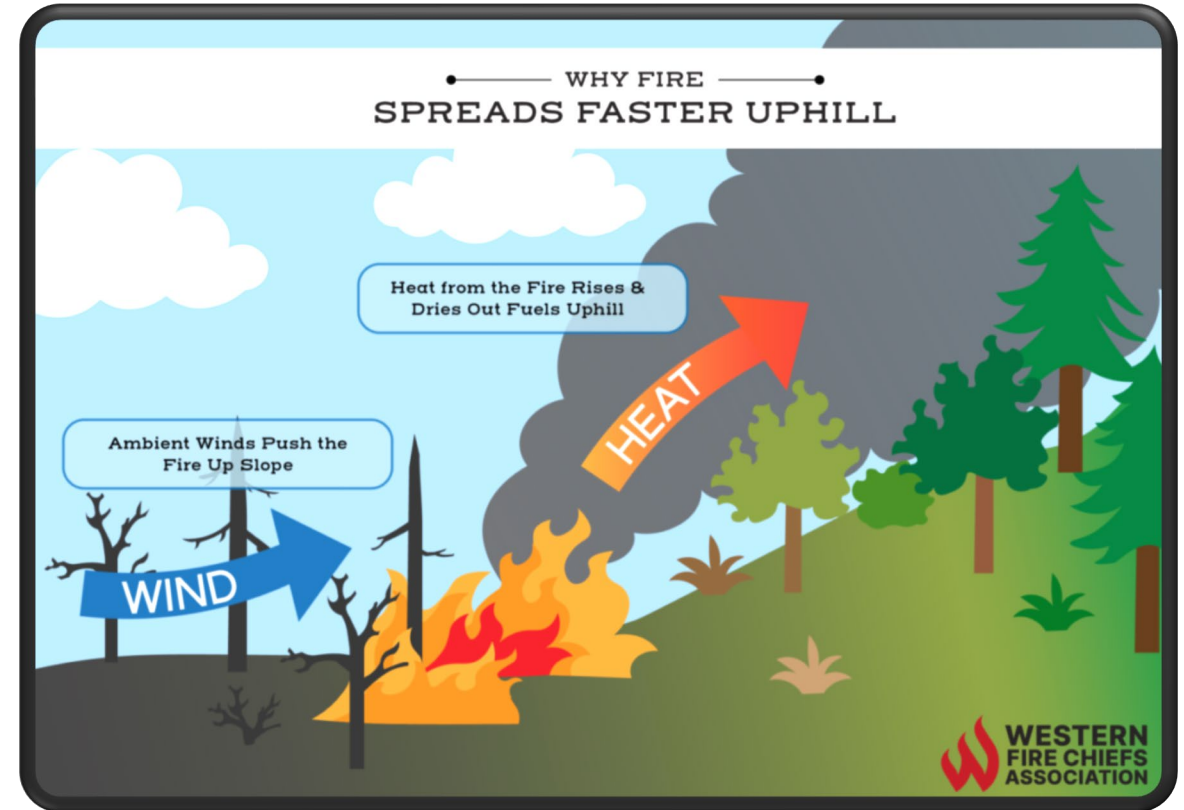


Image source: Western Fire Chiefs Association. (2022, November 2). How Fast do Wildfires Spread? WFCA. <https://wfca.com/articles/how-fast-do-wildfires-spread/>

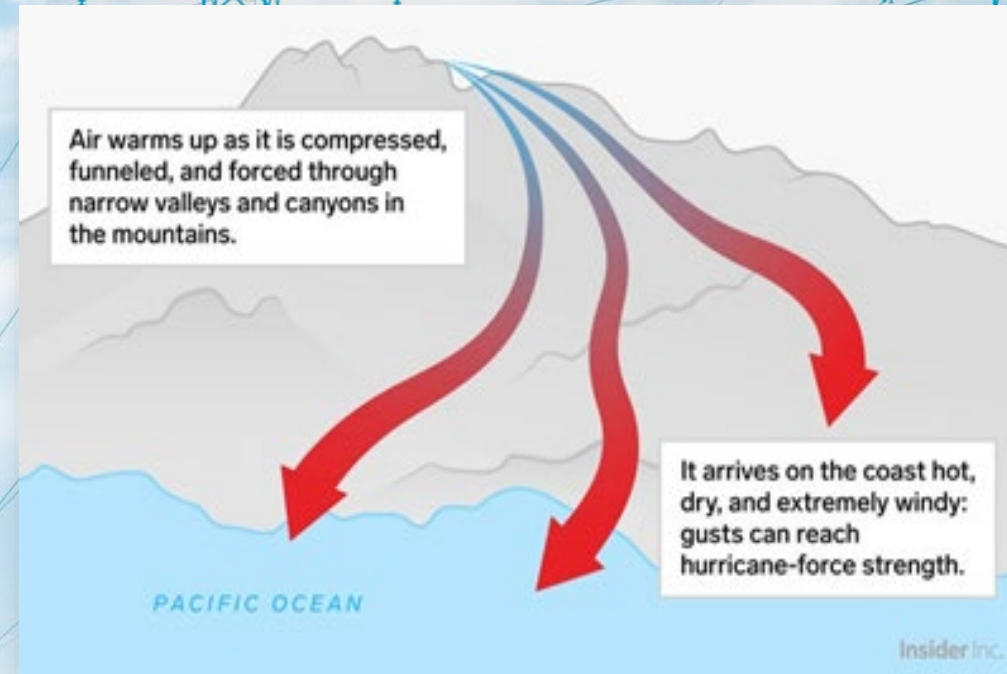


# LOCAL CONDITIONS

## Background: Topographical Effects

### Venturi Effect

- Air funneling
- Constricted areas
- Increased wind speed
- Compressed air



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Image source: Brueck, H. (2019, October 28). Fires across California have been stoked by distinctly dangerous Santa Ana and Diablo winds. here's where they come from. Business Insider, from <https://www.businessinsider.com/santa-ana-winds-why-they-spark-fires-2018-12>

# LOCAL CONDITIONS

## Background: Diablo and Santa Ana Winds

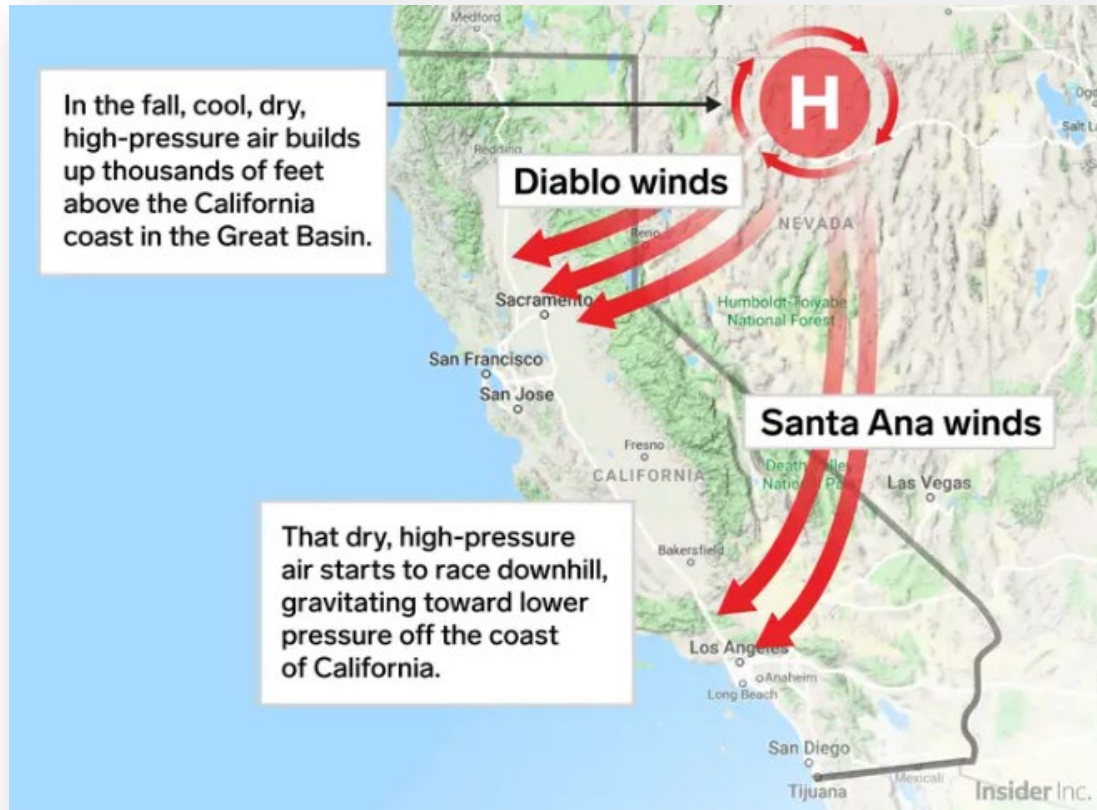
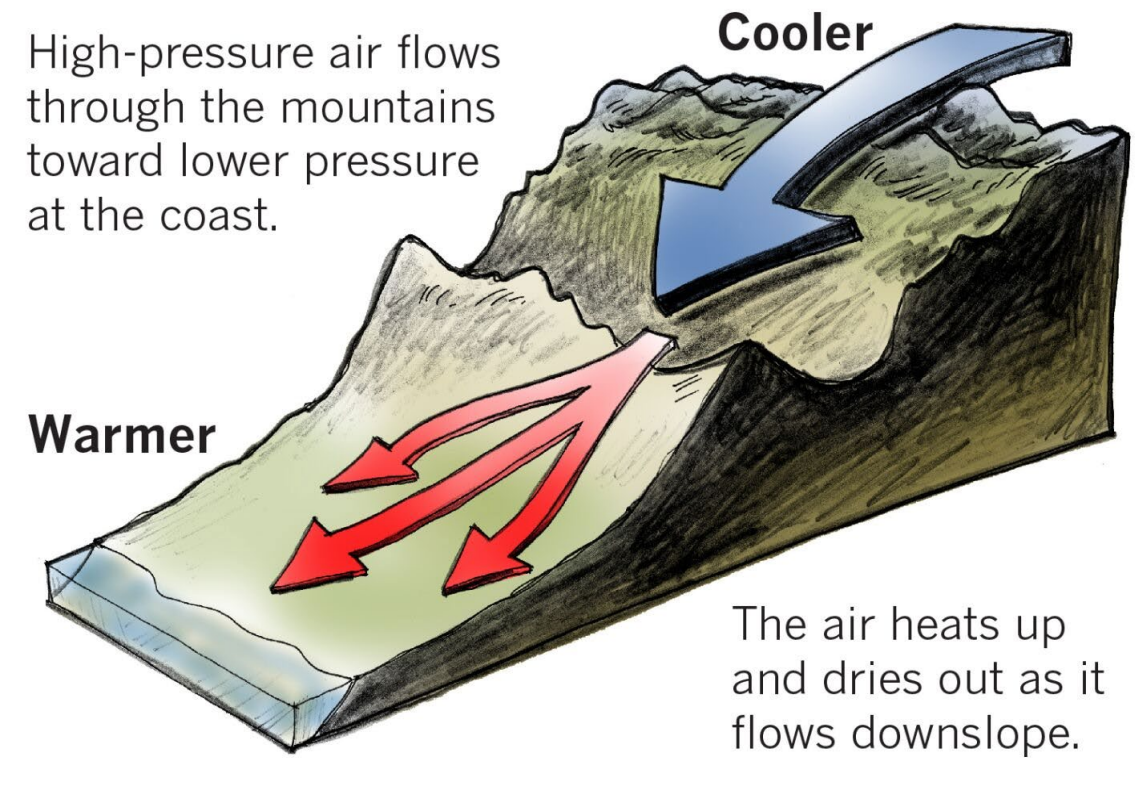


Image source: Brueck, H. (2019, October 28). Fires across California have been stoked by distinctly dangerous Santa Ana and Diablo winds. here's where they come from. Business Insider. Retrieved April 19, 2023, from <https://www.businessinsider.com/santa-ana-winds-why-they-spark-fires-2018-12>





# LOCAL CONDITIONS

## Observations

### Opportunity for Specificity in Regulations<sup>1</sup>

- Compliance is currently achieved by following accepted good practice for the given local conditions known at the time
- Whether certain types of local conditions should be specified

### Integrating the Impact of Climate Change

- Anticipating future extreme conditions
- Climate change projections, risk modeling, and situational awareness

### Implementing New Technologies

- Advanced sensors, artificial intelligence, and remote sensing, etc.

<sup>1</sup>GO 95 Rule 31.1



# LOCAL CONDITIONS

## Discussion Point 1: Adapting to Changing Local Conditions

### Strategies currently in use to adapt existing infrastructure to local conditions

- Risk assessment and prioritization
- System hardening
- Undergrounding
- Microgrids
- Public Safety Power Shutoffs (PSPS)
- High Fire Threat District (HFTD) Map

### Effectiveness and improvements for strategies

- Metrics
- Statistical analysis



*Image source: Lowrey, Annie. "California Is Becoming Unlivable." The Atlantic, 30 Oct. 2019, [www.theatlantic.com/ideas/archive/2019/10/can-california-save-itself/601135](http://www.theatlantic.com/ideas/archive/2019/10/can-california-save-itself/601135)*

# LOCAL CONDITIONS

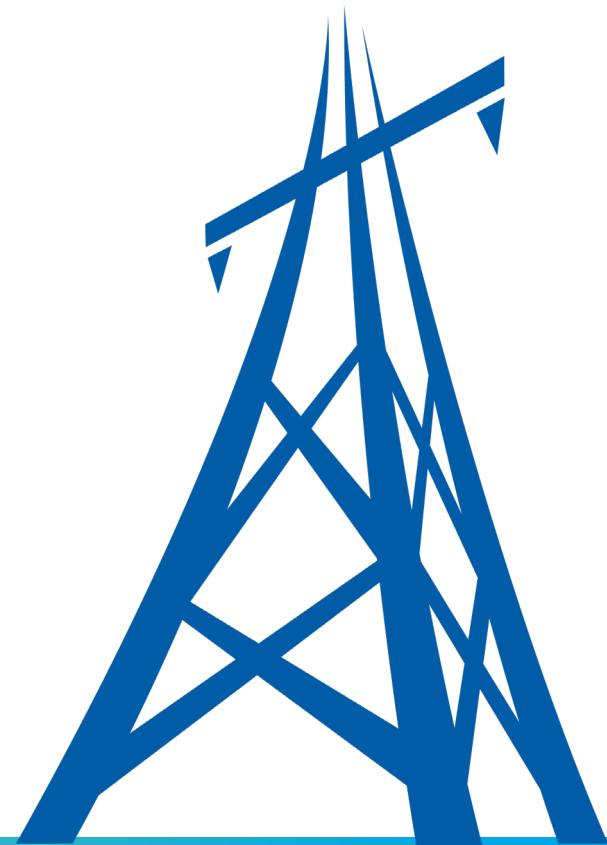
## Discussion Point 2: Embracing Technological Innovations

### Leveraging new technology

- Advanced sensors
- Artificial intelligence
- Remote sensing

### Potential benefits

- Better local awareness
- Efficient operations
- Effective resource allocation
- Increased safety and reliability



# LOCAL CONDITIONS

## Discussion Point 3: Compliance Assessment Depending on Local Conditions

### Monitoring and Assessment of Compliance

- Current practices
- Opportunities for improvement
- Consistent adherence to standards



*Image source: Miller, Ryan. ““Volatile,” “Incredibly Dangerous”: Images of Raging Flames as California Wildfires Burn.” USA TODAY, 8 Nov. 2018, [www.usatoday.com/story/news/nation-now/2018/11/08/camp-fire-hill-fire-images-destruction-california-wildfires/](http://www.usatoday.com/story/news/nation-now/2018/11/08/camp-fire-hill-fire-images-destruction-california-wildfires/)*





# LOCAL CONDITIONS

Panel Presentations &  
Public Comment  
Discussion





# 10-MINUTE BREAK

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# SITUATIONAL AWARENESS

**John Alderson**, Vegetation Management Expert, M.S. (Public Administration), B.S. (Forestry), B.S. (Biology), ISA Certified Arborist and TRAQ, Pest Control Adviser, Qualified Applicator, Green Grid Inc.

**Jennifer Fuller**, Utility Vegetation and Wildfire Analyst, B.S. (Environmental Science), ISA Certified Arborist and TRAQ, Green Grid Inc.

# SITUATIONAL AWARENESS - BACKGROUND

**Know**

**Know** what has happened in a similar situation in the past, what is happening now, and what is expected to happen next

**Plan**

**Plan** for all foreseeable threats

**Expect**

**Expect** the unexpected and proactively manage foreseeable situations

# SITUATIONAL AWARENESS

## Background

**Personnel training**, communication protocols and the use of equipment

**Effective and efficient** flow of situational information

**Correlation of analysis and predictive data** with ground truth data

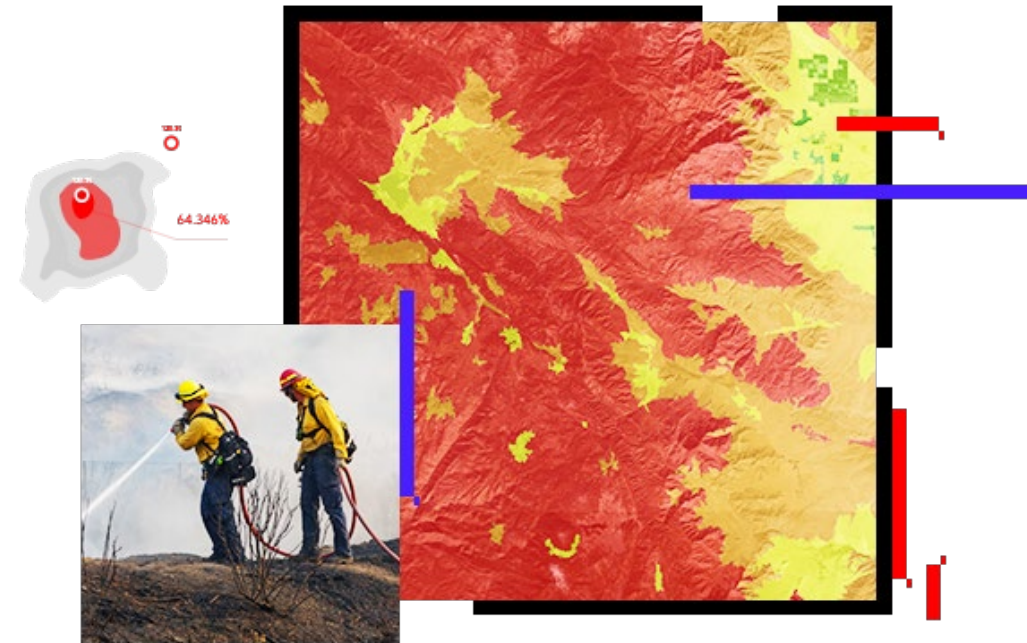


Image source: ESRI. "GIS for Wildfire Preparedness, Response & Recovery | Mapping for Situational Awareness." [www.sigsa.info](http://www.sigsa.info), [www.sigsa.info/es-mx/industries/fire-rescue-ems/solutions/wildland-fire-management](http://www.sigsa.info/es-mx/industries/fire-rescue-ems/solutions/wildland-fire-management).



# SITUATIONAL AWARENESS

## Observations

### Industry Practices

- Advanced weather modeling
- Fire threat forecasting and monitoring
- Asset data
- Vegetation data

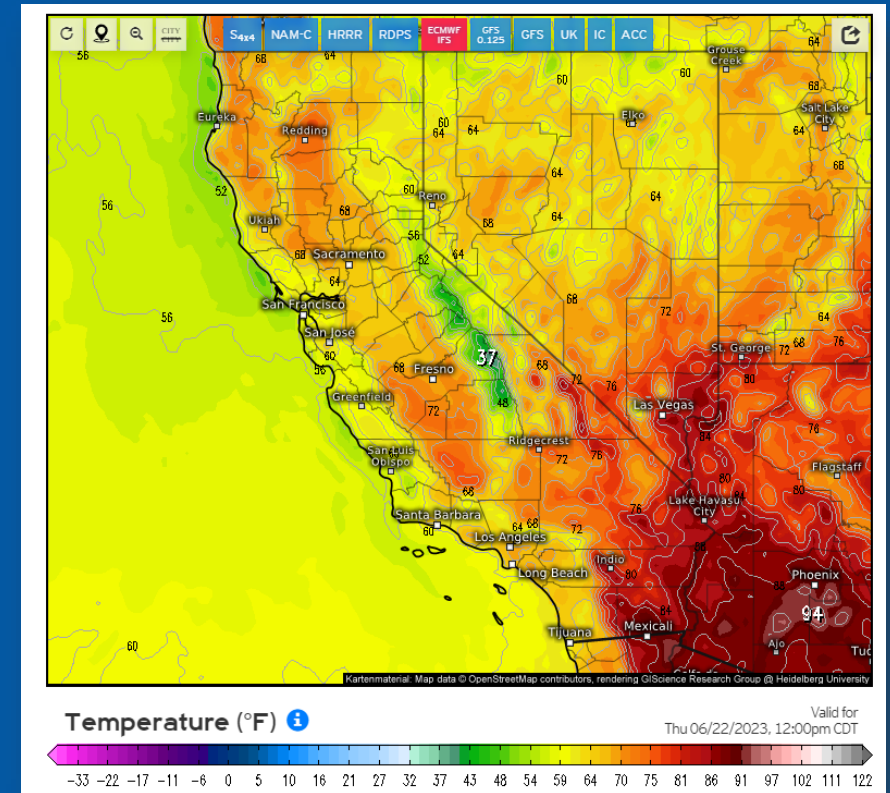


Image source: "Model Charts for California (Temperature) | ECMWF IFS HRES 0z/12z (10 Days)." [Weather.us, weather.us/model-charts/euro/california](https://weather.us/model-charts/euro/california).

# SITUATIONAL AWARENESS

## Discussion Point 1: Quantitative and Qualitative Information for Weather, Equipment, and Vegetation

### Weather as a Dynamic Threat

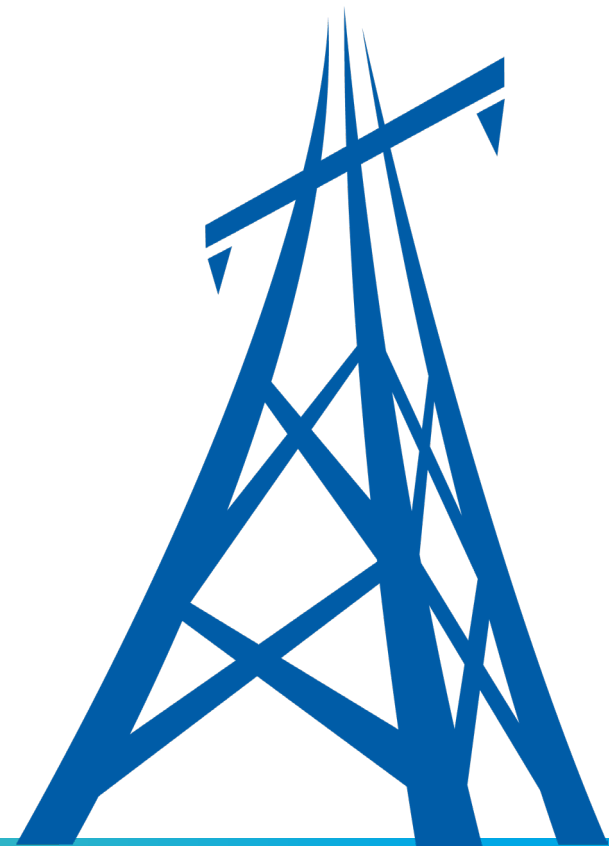
- Weather is a dynamic threat to utility services that can drive ignition
- Analyzing current weather-related threats and predicting future threats
- Respond to what is happening now, and anticipate what is happening next

### Moisture Content in Vegetation

- Close link between weather conditions and moisture content in vegetation
- Level of threat in ignitions

### Forecasting

- Better weather forecasting and real-world monitoring



# SITUATIONAL AWARENESS

## Discussion Point 2: Data Collection in Right of Ways

### When, Where, and Why

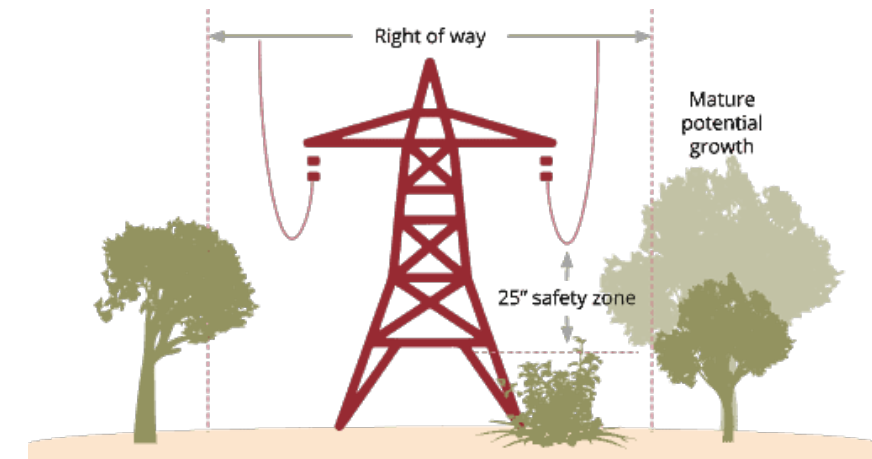
- Analyzing past ignitions by examining the circumstances surrounding each event
- Comprehensive data collection for right of way situations

### How

- Smart cameras
- Weather stations
- Continuous line sensors

### Data Fidelity

- Need high confidence level in data



*Image source: Lynn. "Advances in Utility Vegetation Management and Inspection - Mosaic51." Mosaic51.com, 31 Mar. 2021, [www.mosaic51.com/technology/advances-utility-vegetation-management-and-inspection/](http://www.mosaic51.com/technology/advances-utility-vegetation-management-and-inspection/)*



# SITUATIONAL AWARENESS

## Discussion Point 3: Remote Sensing Technologies

### Types of Remote Sensing

- Airborne/Spaceborne
- Weather stations
- Remote monitoring systems

### Potential Benefits

- Increased situational awareness
- Overcome geographical constraints
- Rapid response
- Increased safety and reliability

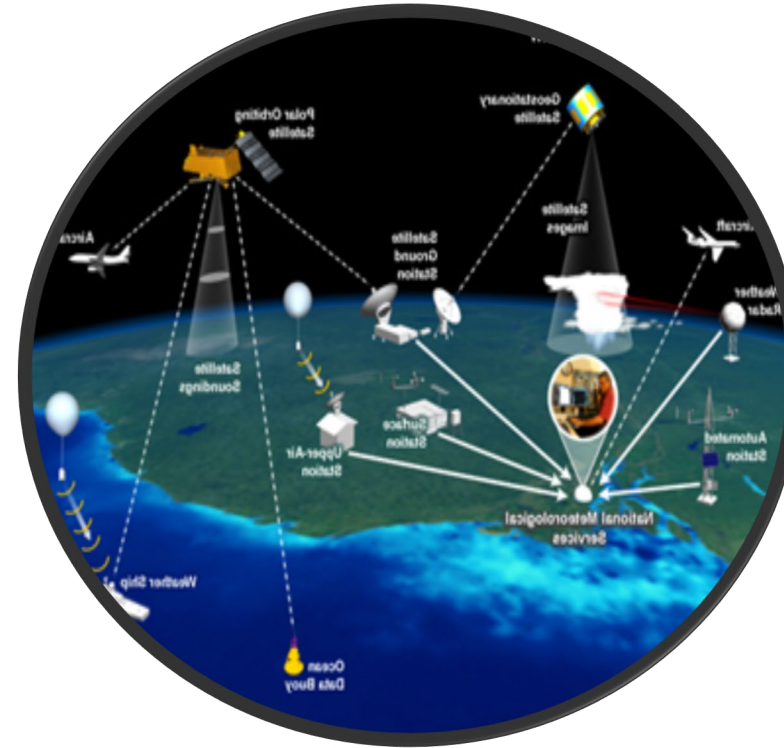


Image source: Singapore, M. S. (2023). Weather forecasting has evolved with huge advances in technology, yet limitations remain [Photograph]. <http://www.weather.gov.sg/forecasting-2/>



# EMERGENCIES AND DISASTERS

**Rebecca Tratter**, Environmental Scientist, B.S. (Life Science)  
Green Grid Inc.

# EMERGENCIES AND DISASTERS

## Background

- Crucial in saving lives, minimizing damages, enhancing community resilience, and promoting a safer and more secure environment
- Involves developing plans and implementing strategies to minimize natural and man-made disasters



*Image source: Martinez, D. (2018). Tech companies offer donations and digital tools to aid California wildfire response [Photograph]. <https://www.nbcnews.com/tech/tech-news/tech-companies-offer-donations-digital-tools-aid-california-wildfire-response-n935791>*



# EMERGENCIES AND DISASTERS

## Observations

### Existing Regulations<sup>1</sup>

- Mutual assistance during a major outage
- Conducting annual emergency training and exercise

### Opportunities for Specificity in Regulations

- Wildfire emergency management protocol
- Incorporating evacuation procedures in High Fire Threat and High Fire Risk Areas
- Monthly training on drills and techniques



Image source: Archibold, R. (2008). Wildfires Force Evacuations in L.A. [Photograph].  
<https://www.nytimes.com/2008/10/14/us/14fire.html>



# EMERGENCIES AND DISASTERS

## Discussion Point 2: Enhancing Wildfire Training

### Existing Practices

- Frequency and level of training
- Learning from past events

### Training Enhancement

- Increased awareness
- Emergency response drills
- Collaborative tabletop exercises and simulations
- Learning opportunities
- Reduced wildfire impact

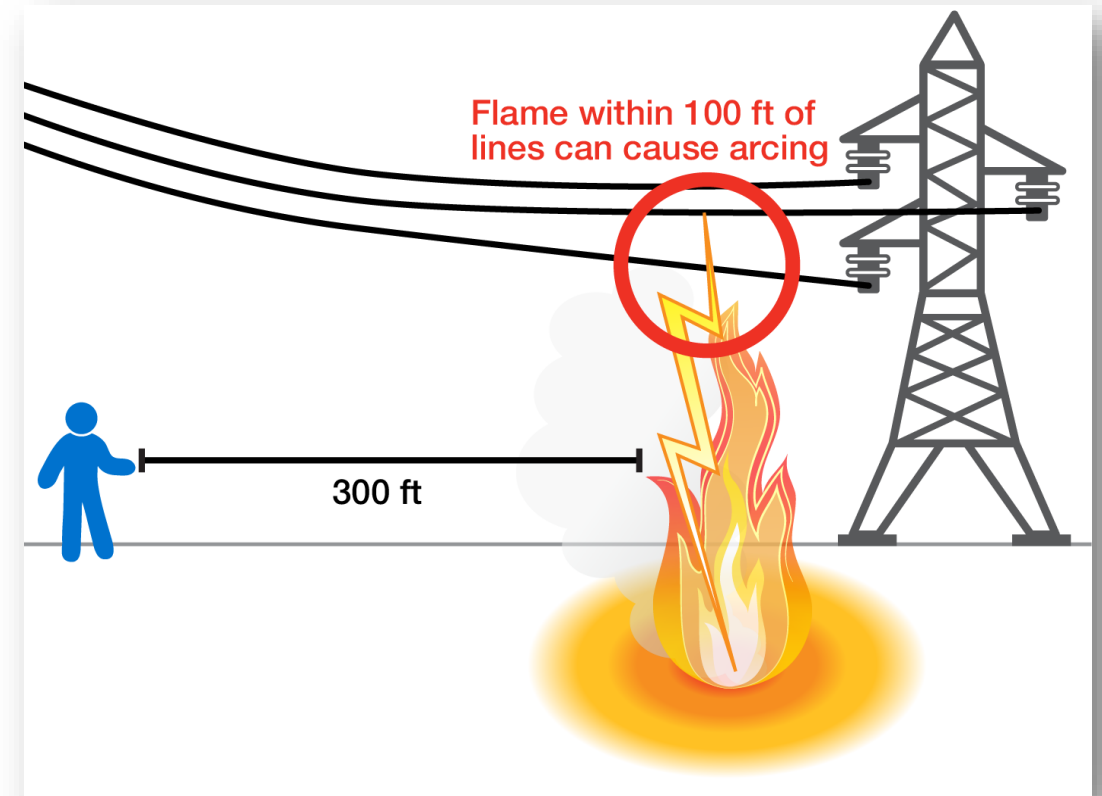


Image source: [PPL Electric Utilities]. (2023, June 17). Transmission line Fire [Video]. PPL Electric Utilities. <https://ppl.e-smartresponders.com/topic/transmission-line-fires/>





**JOINT  
SITUATIONAL  
AWARENESS;  
EMERGENCY AND  
DISASTERS**

Panel Presentations &  
Public Comment  
Discussion





**1-HOUR  
LUNCH  
BREAK**

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NOT FOR DISTRIBUTION

# RISK ASSESSMENT AND MODELING

Marcela Jaramillo, Sr. Environmental Analyst, Ph.D. (Environmental Chemistry)  
Green Grid Inc.

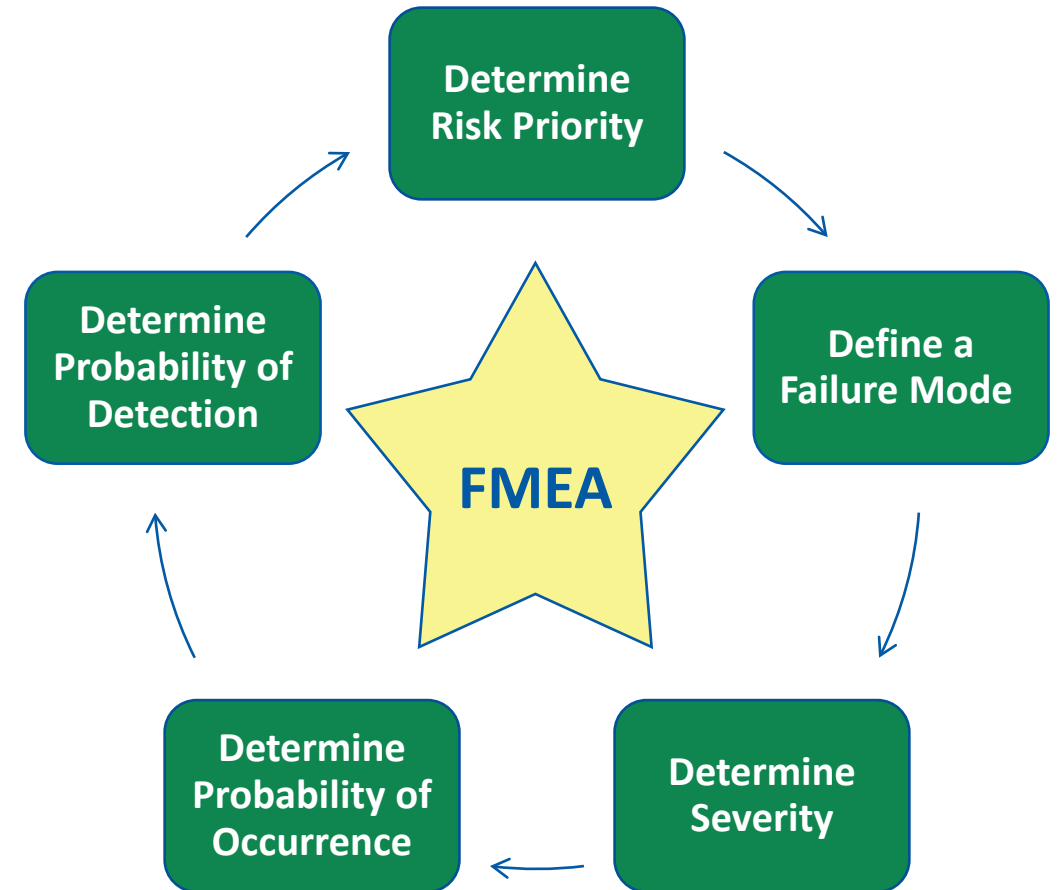


# RISK ASSESSMENT AND MODELING

## Background

### Risk-Based Prioritization and Operation

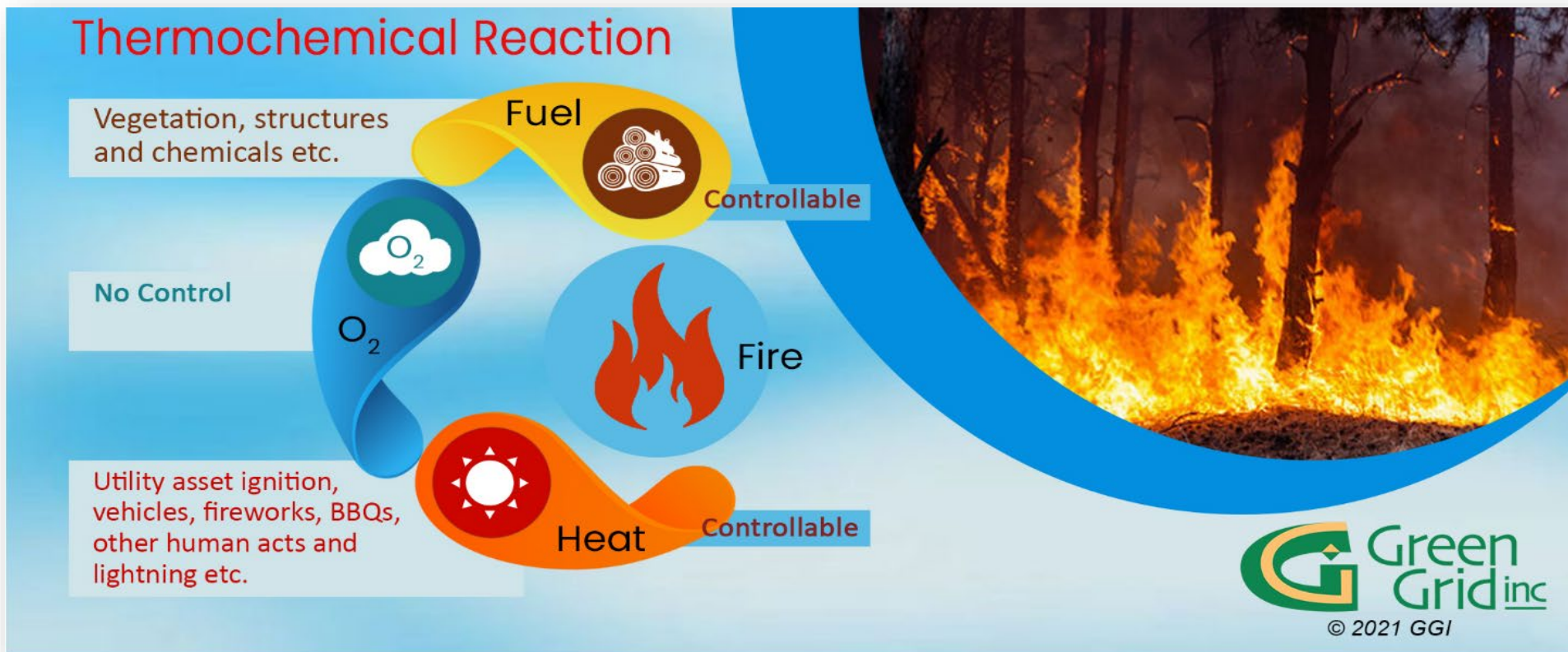
- Accurate input data
- Good quality reliable models
- Reliable output data/results
- Efficient and effective implementation of results
- Safer, reliable, and cost-effective operations



# RISK ASSESSMENT AND MODELING

## Background

### Principles of Wildfires



# RISK ASSESSMENT AND MODELING

## Background



### Inspection

Optimize schedule and priorities



### System Hardening/Maintenance

Increased effective maintenance activities

Efficient and effective system hardening



### Emergency Response

Streamline and prioritize response planning



*Image source: Microsoft PowerPoint 365*



# RISK ASSESSMENT AND MODELING

## Observations

### Opportunity for Specificity in Regulatory Requirements

- Risk-Based Decision-Making Framework (RDF)
  - Risk Assessment and Mitigation Phase (RAMP)<sup>1,3</sup>
    - Annual Risk Mitigation and Spending Accountability Reports
  - Safety Modeling Assessment Proceeding (S-MAP)<sup>2,4</sup>
    - Examine, understand, and comment on the models
    - Establish guidelines and standards for these models
- Various statistical modeling approaches

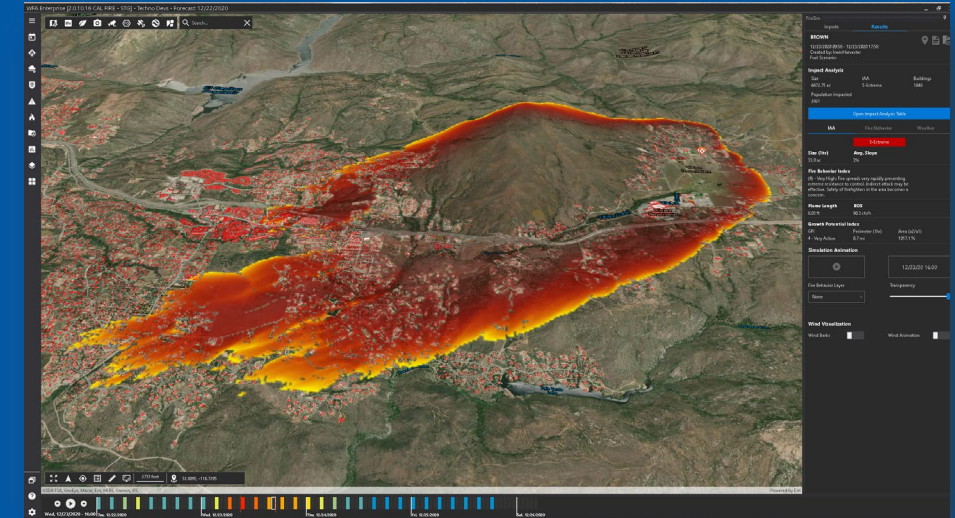


Image source: Elbein, Saul. "What the Complex Math of Fire Modeling Tells Us about the Future of California's Forests." MIT Technology Review, 18 Jan. 2021, [www.technologyreview.com/2021/01/18/1016215/complex-math-fire-modeling-future-california-forests/](https://www.technologyreview.com/2021/01/18/1016215/complex-math-fire-modeling-future-california-forests/).

<sup>1</sup>R.13-11-006 (2013-2020, Closed)

<sup>2</sup>D.16-08-018 (2016, 1<sup>st</sup> S-MAP)

<sup>3</sup>D.20-01-002 (2020)

<sup>4</sup>R.20-07-013 (2020-Inprogress, 2<sup>nd</sup> S-MAP)

# RISK ASSESSMENT AND MODELING

## Observations

### Summary Map of Wildfire Risk

- Overall Ignition Probability
- Estimated Wildfire Consequences

### Climate-Driven Risk Map and Modeling

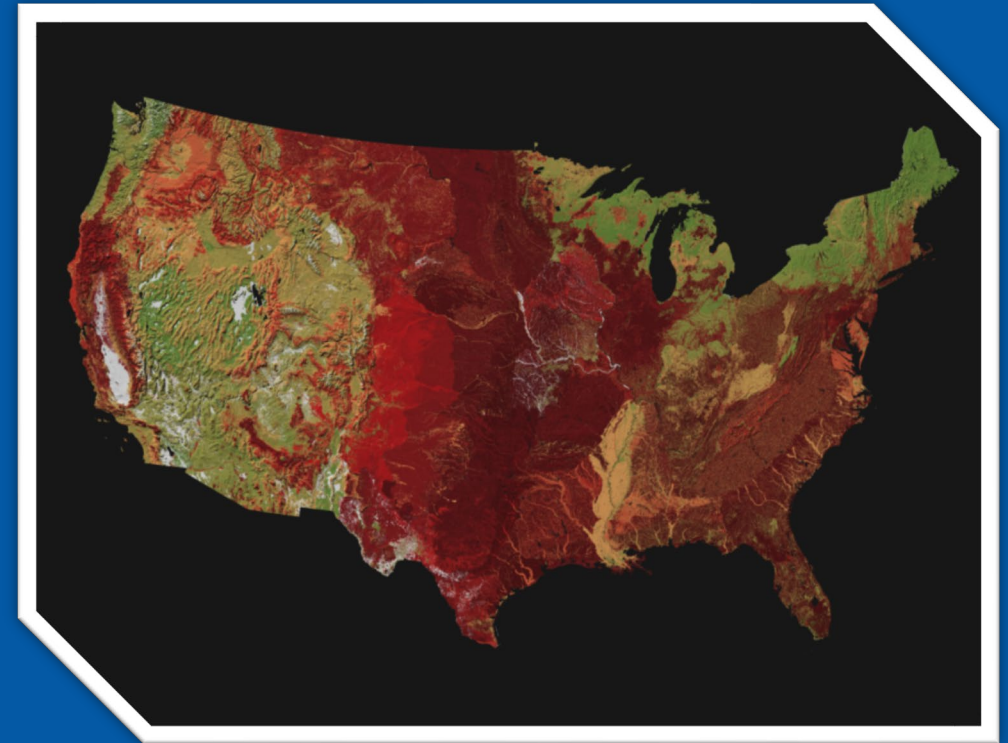
- Using Relevant Weather Scenarios

### Mapping and Estimation of PSPS

- Establishing Thresholds and Impacts

### Modeling Resolution

- Temporal
- Spatial



*Rott, Nathan. "Wildfire Risk Is Growing Everywhere, Even as More Americans Move into Harm's Way." LAist - NPR News for Southern California - 89.3 FM, 10 Aug. 2021, [www.kpcc.org/npr-news/2021-08-10/wildfire-risk-is-growing-everywhere-even-as-more-americans-move-into-harms-way](http://www.kpcc.org/npr-news/2021-08-10/wildfire-risk-is-growing-everywhere-even-as-more-americans-move-into-harms-way).*

# RISK ASSESSMENT AND MODELING

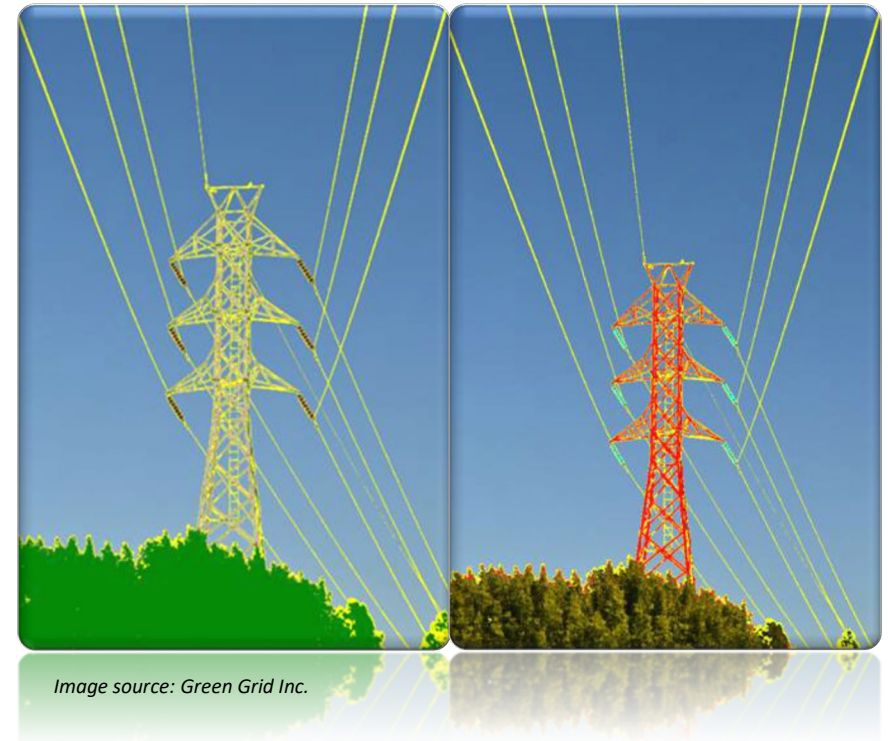
## Discussion Point 1: Inclusion of Local Climate Factors

### Risk Models

- Risk-based decision framework and climate change
- Climate-driven risk factors
- Extreme weather events and ignitions
- Seasonal vegetation growth rates
- Asset vulnerabilities

### Standardizing Risk Models in Regulation

- Defining risk factors
- Accuracy and validation
- Regulatory compliance and enforcement





# RISK ASSESSMENT AND MODELING

## Discussion Point 2: Utilizing New Technologies to Enhance Risk Monitoring

### Leveraging New Technology

- Potential of real-time surveillance
- Advanced sensors
- Artificial intelligence

### Potential Benefits

- Enhanced risk measurement
- Real-time surveillance
- Improved decision making
- Resource optimization

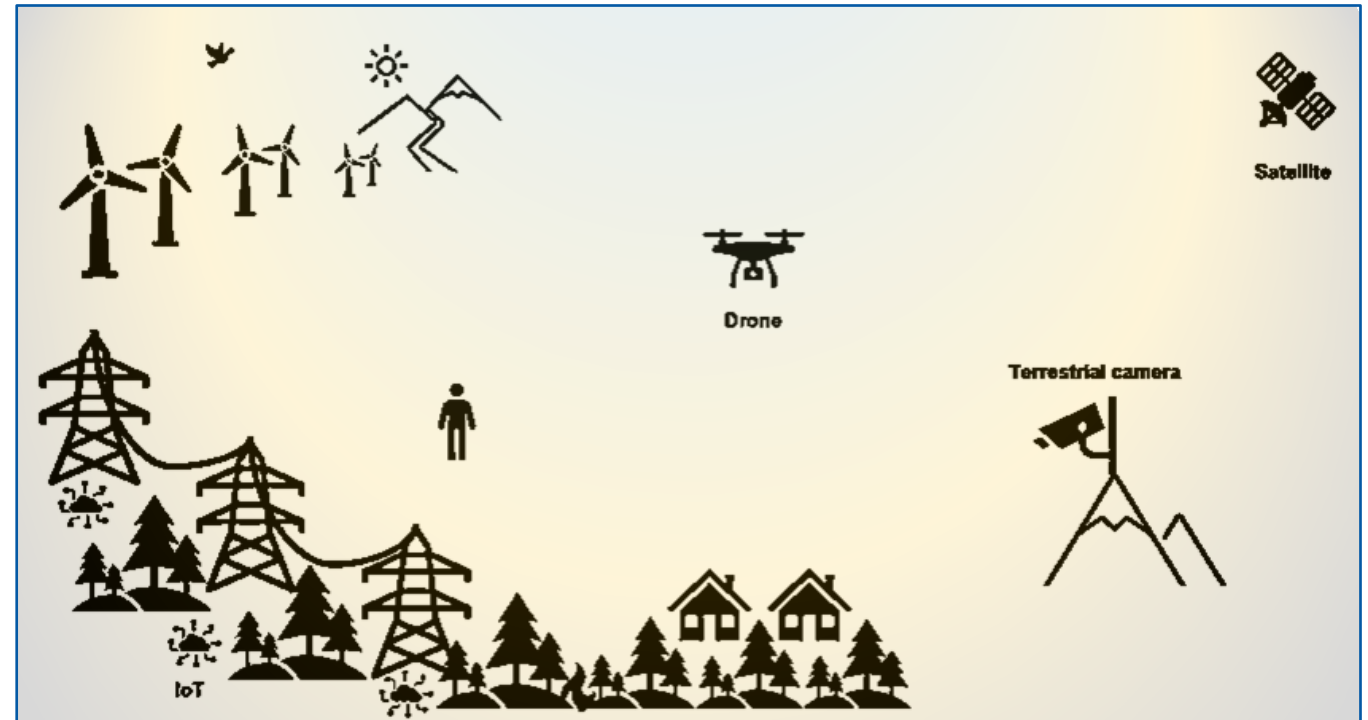


Image source: Green Grid Inc.





# RISK ASSESSMENT AND MODELING

Panel Presentations &  
Public Comment  
Discussion





# 10-MINUTE BREAK

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# VEGETATION MANAGEMENT

**John Alderson**, Vegetation Management Expert, M.S. (Public Administration), B.S. (Forestry), B.S. (Biology), ISA Certified Arborist and TRAQ, Pest Control Adviser, Qualified Applicator, Green Grid Inc.

**Jennifer Fuller**, Utility Vegetation and Wildfire Analyst, B.S. (Environmental Science), ISA Certified Arborist and TRAQ, Green Grid Inc.

# VEGETATION MANAGEMENT

## Background: History of Wildfires in 11 Western States

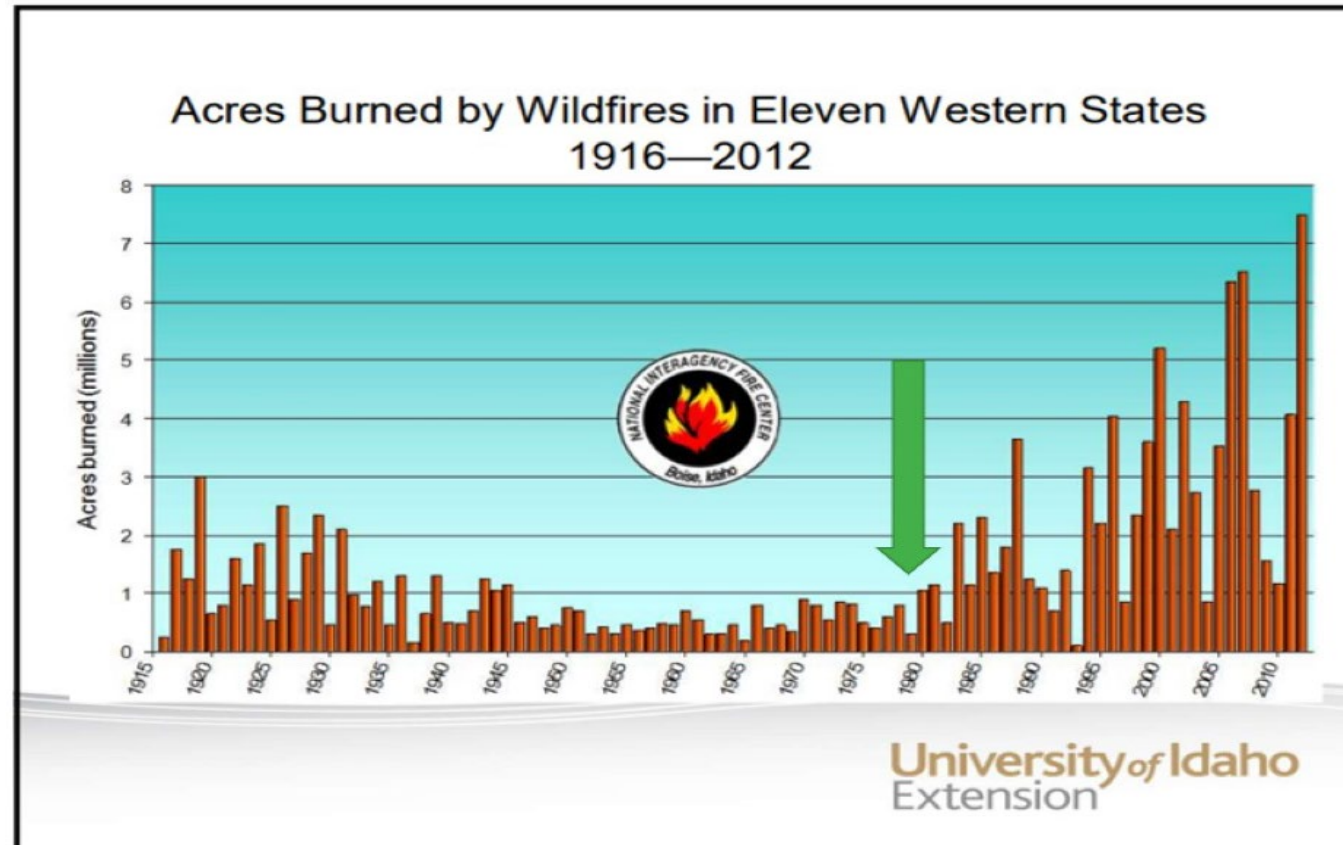


Image source: Miller, Beau. Territory Manager. Corteva Agriscience. (Received April 15<sup>th</sup>, 2023). Fire Frequency [Photograph]. University of Idaho Extension.

# VEGETATION MANAGEMENT

## Background: Frequency of Wildfires

### • Fire Frequency 1983-2015

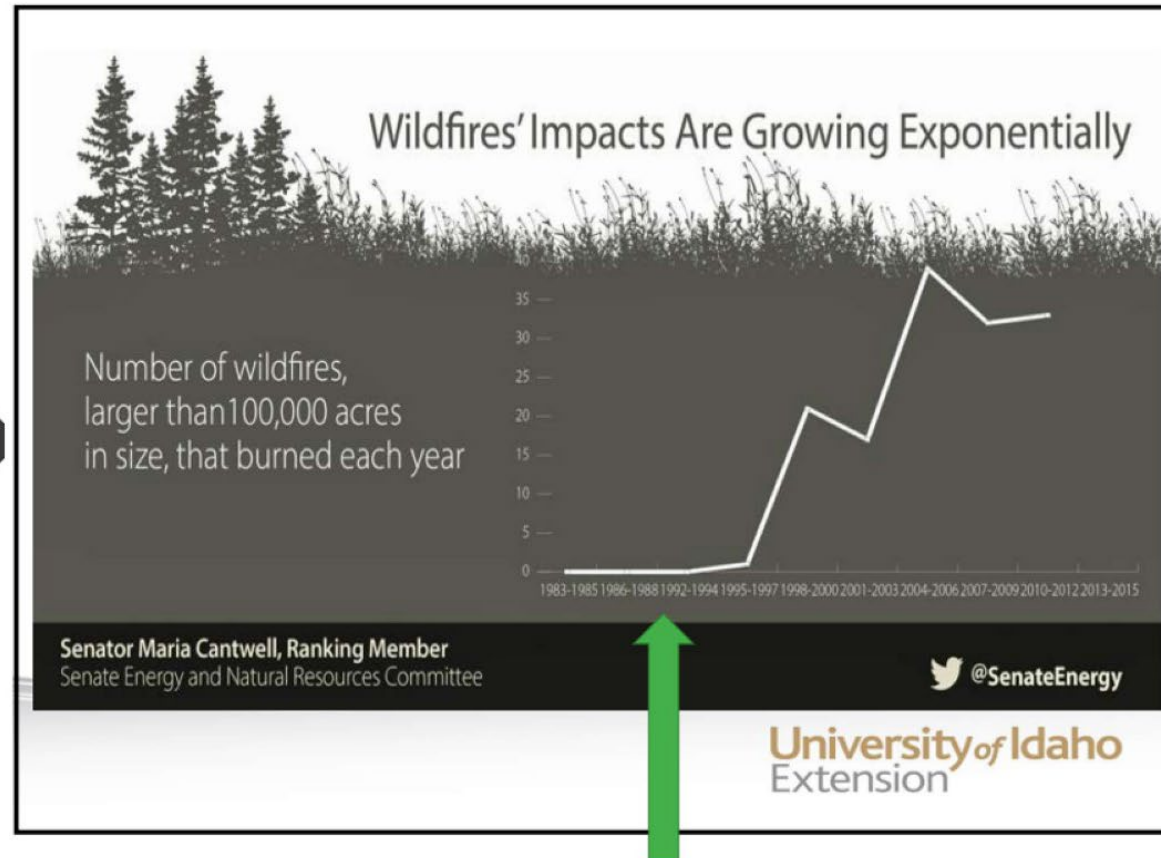


Image source: Miller, Beau. Territory Manager.Corteva Agrosience. (Received April 15<sup>th</sup>, 2023). Fire Frequency [Photograph]. University of Idaho Extension.



# VEGETATION MANAGEMENT

## Background: Temporal Forest Transition

Transition In  
Photos -  
1909



*Image source: Miller, Beau. Territory Manager.Corteva Agroscience. (Received April 15<sup>th</sup>, 2023). Fire Frequency [Photograph]. University of Idaho Extension.*

# VEGETATION MANAGEMENT

## Background: Forest Succession

Same  
Location -  
1948



*Image source: Miller, Beau. Territory Manager.Corteva Agroscience. (Received April 15<sup>th</sup>, 2023). Fire Frequency [Photograph]. University of Idaho Extension.*

# VEGETATION MANAGEMENT

## Background: Temporal Forest Transition

Same  
Location -  
1989



*Image source: Miller, Beau. Territory Manager.Corteva Agroscience. (Received April 15<sup>th</sup>, 2023). Fire Frequency [Photograph]. University of Idaho Extension.*



# VEGETATION MANAGEMENT

## Background: Extremes of Climatic Conditions

- Drought, heat, wind, snow, rain, and fuels
- California has the highest variation in precipitation annually of any other state
- Increasingly heavy fuel load accumulations
- Rise in herbaceous plants and grass

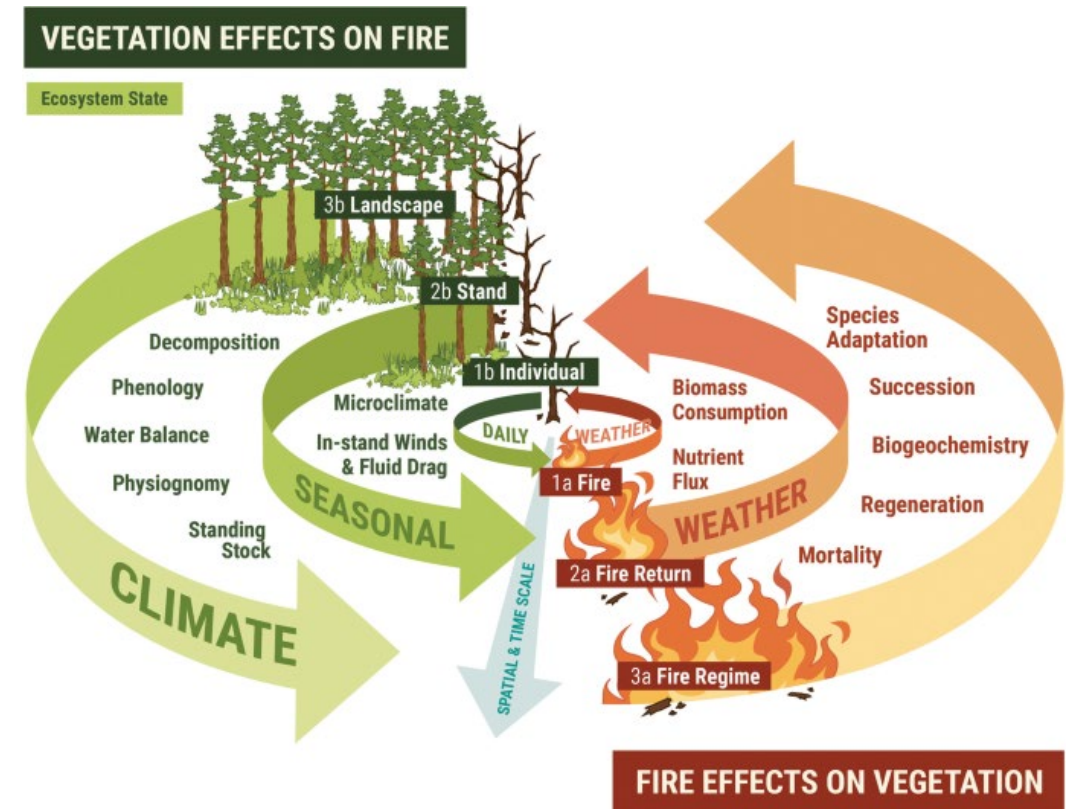
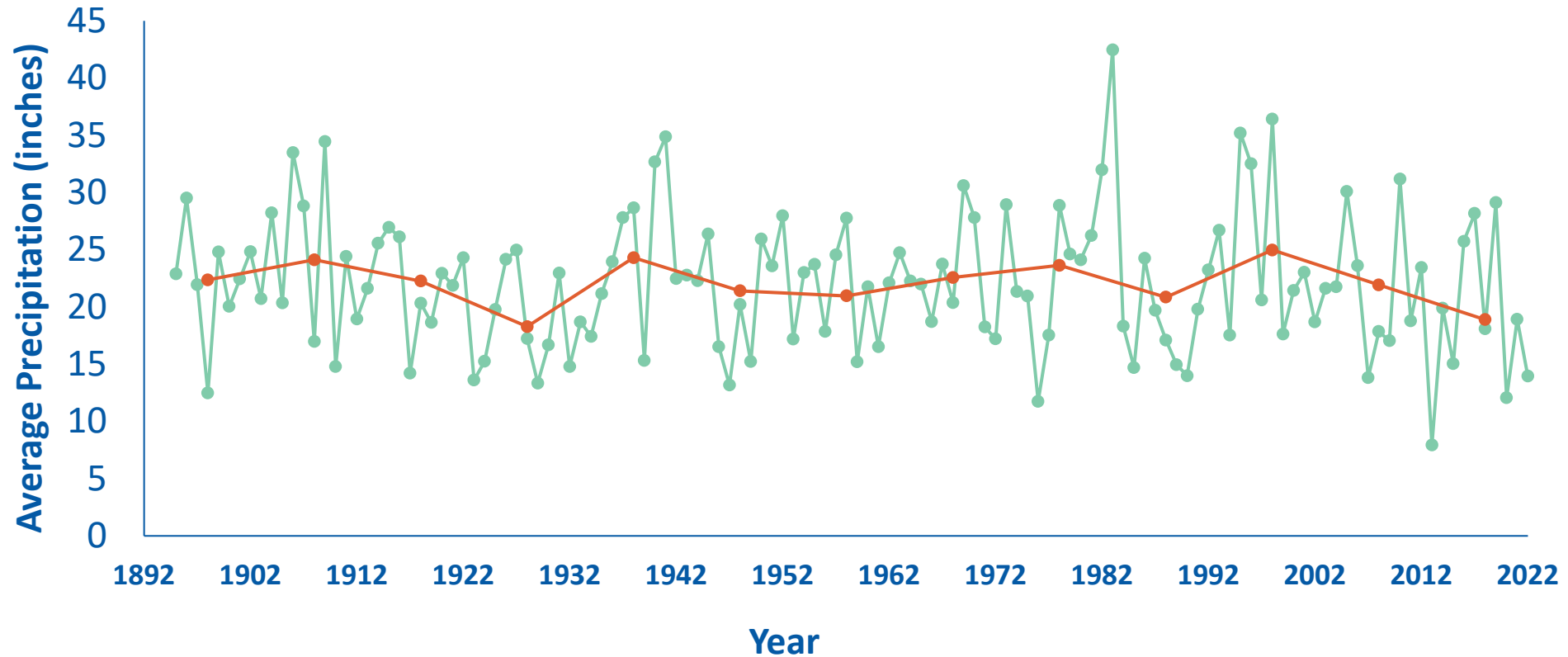


Image source: (2021). Vegetation's influence on fire behavior goes beyond just being fuel [Photograph].  
<https://fireecology.springeropen.com/articles/10.1186/s42408-022-00132-9#fig1>.

# VEGETATION MANAGEMENT

Background: Average Precipitation in the State of California (1895 – 2022)



Date source: Average Annual Precipitation in inches in the State of California from 1895 to 2022 (Blue) and average precipitation per decade (Orange). The data is publicly available by NOAA and found at NOAA National Centers for Environmental Information, Climate-at-a-Glance: Statewide Time Series, published January 2023, retrieved on January 19, 2023

# VEGETATION MANAGEMENT

## Background: Fuel Loading

### Higher Fuel Loading

- Frequent cooler low-intensity fires to high levels of fuel loading that burn with much higher intensity
- Increased number and frequency of catastrophic fires with greater consequences



*Image source: (2021). Vegetation's influence on fire behavior goes beyond just being fuel [Photograph]. <https://fireecology.springeropen.com/articles/10.1186/s42408-022-00132-9#Fig1>.*

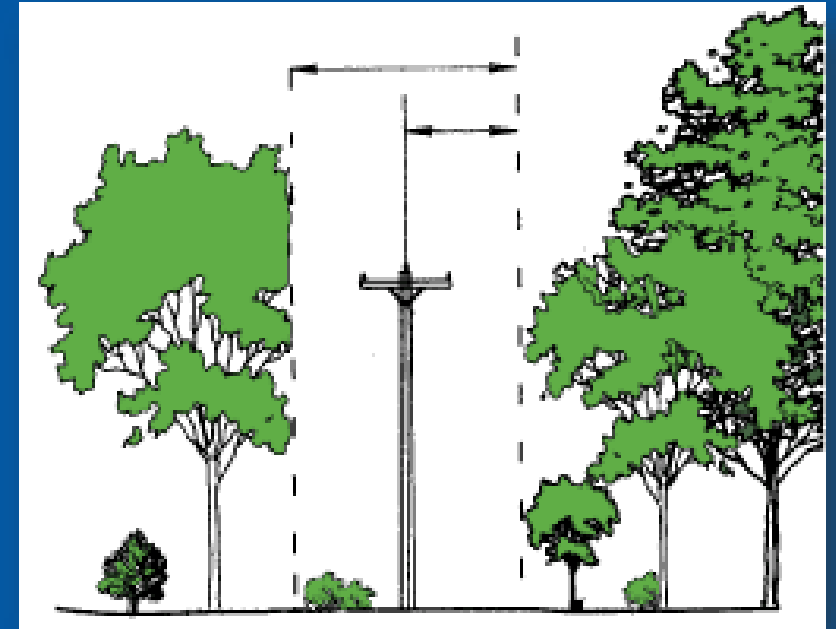


# VEGETATION MANAGEMENT

## Observations

### Existing Regulations<sup>1</sup>

- Vegetation clearance
- Defined radial clearances
- Defined pole clearances
- Major Woody Stem Exemption



*Image source: Cimarron Electric. Vegetation Management – Cimarron Electric Cooperative. [cimarronelectric.com/home/resources/vegetation-management/](http://cimarronelectric.com/home/resources/vegetation-management/).*

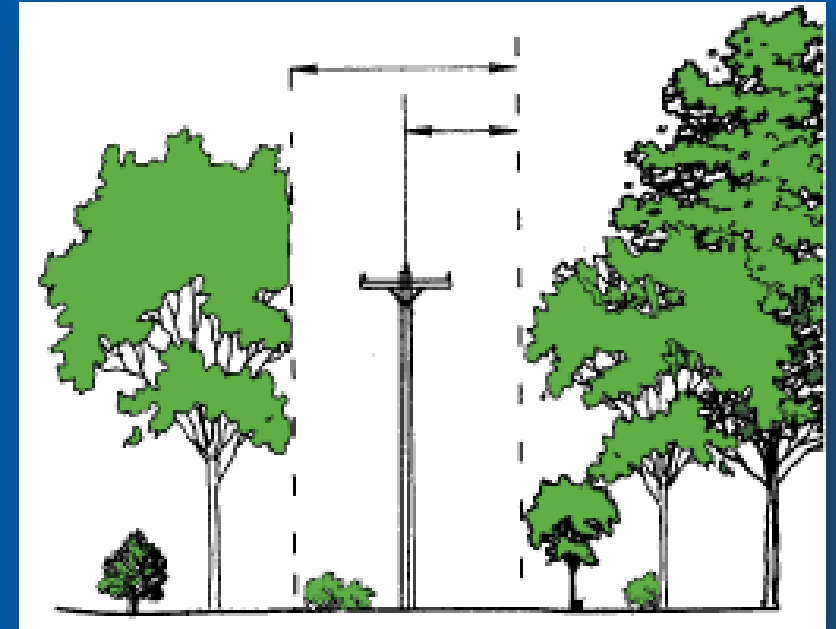
<sup>1</sup>GO 95 Rule 35, PRC 4292, 4293

# VEGETATION MANAGEMENT

## Discussion Point 1: General Vegetation Management

### Opportunities for Specificity in the Regulations<sup>1</sup>

- Vegetation Management
  - Vegetation inventory system
  - Integrated Vegetation Management (IVM)
- Vegetation clearance
  - Clearances between conductors and trees based on growth rates and species
  - Inspection intervals based on growth rates and tree conditions
  - Tree limbs over conductors
  - Risk-based clearance
  - Major Woody Stem (MWS) exemption



*Image source: Cimarron Electric. Vegetation Management – Cimarron Electric Cooperative. [cimarronelectric.com/home/resources/vegetation-management/](http://cimarronelectric.com/home/resources/vegetation-management/).*

<sup>1</sup>GO 95 Rule 35, PRC 4292, 4293

# VEGETATION MANAGEMENT

## Discussion Point 2: Identification of Hazard Trees

### Danger tree:

“...any tree located on or adjacent to a utility right-of-way or facility that could damage utility facilities should it fall where (1) the tree leans toward the right-of-way, or (2) the tree is defective because of any cause, such as heart or root rot, shallow roots, excavation, bad crotch, dead or with dead top, deformity, cracks or splits, or any other reason that could result in the tree or main lateral of the tree falling.” (California Code of Regulation Title 14 § 895.1)

### Opportunities:

- Frequency of inspection for hazard trees
- Level of inspection (Level 1 vs. Level 2)
- Integrate tree mortality data set



*Image source: W. B. (2023). A dead oak tree [Photograph].  
<https://www.picfair.com/pics/07640326-a-dead-oak-tree>*



# VEGETATION MANAGEMENT

## Discussion Point 3: Vegetation Inventory System

### Existing Practices:

- Inventory systems
- Tree location
- Tree species and condition
- Tree history
- Data accessibility

### Opportunities:

- Standardized electronic vegetation inventory systems
- Eradication of undesirable species
- Major Woody Stems (MWS)



*Image source: Green Grid inc.*

# VEGETATION MANAGEMENT

## Discussion Point 4: Risk-Based Prioritization of Work

### Existing Practice:

- **Compliance-Based:** Policy dictates how often work and other tasks should occur

### Potential Opportunity:

- **Risk-Based:** Inspection and work based on risk
- Arborist trained to make risk-based decisions on tree assessments



Image source: Green Grid Inc.

# VEGETATION MANAGEMENT

## Discussion Point 5: Vegetation Clearance – Tree Limbs Over Conductors

### Branch Drop

- Tree branches growing over and falling on conductors
- Branches during high winds have the potential to be blown at an angle

### Potential Remedies

- Proactive risk-based pruning strategy
- Risk assessment for tree removal
- Remove high risk trees within strike distance



*Image source: Press, Associated. "Strong Gusts Fell Tree Limbs, Cutting Power to Thousands in New England." Concord Monitor, Concord Monitor, 29 Mar. 2021, [www.concordmonitor.com/More-than-89K-without-power-because-of-high-winds-39703961](http://www.concordmonitor.com/More-than-89K-without-power-because-of-high-winds-39703961)*



# VEGETATION MANAGEMENT

## Discussion Point 6: Integrated Vegetation Management

### Fire Risk Scenarios

- Flammable vegetation on ROWs, substations, and utility poles
- Ignition risk from falling branches, trees, and grow-ins

### Potential Opportunities

- Database for flammable ground vegetation locations
- Environmentally sensitive response dependent on site conditions
  - Biological, chemical, mechanical, manual, and cultural controls
  - Continuous remote monitoring of ROWs



*Image source: Statnett. "Can Goats Be Used to Control the Vegetation under Power Lines?" Statnett, 12 June 2023, [www.statnett.no/en/about-statnett/innovation-and-technology-development/](http://www.statnett.no/en/about-statnett/innovation-and-technology-development/).*





# VEGETATION MANAGEMENT

Panel Presentations &  
Public Comment  
Discussion



# SURVEY

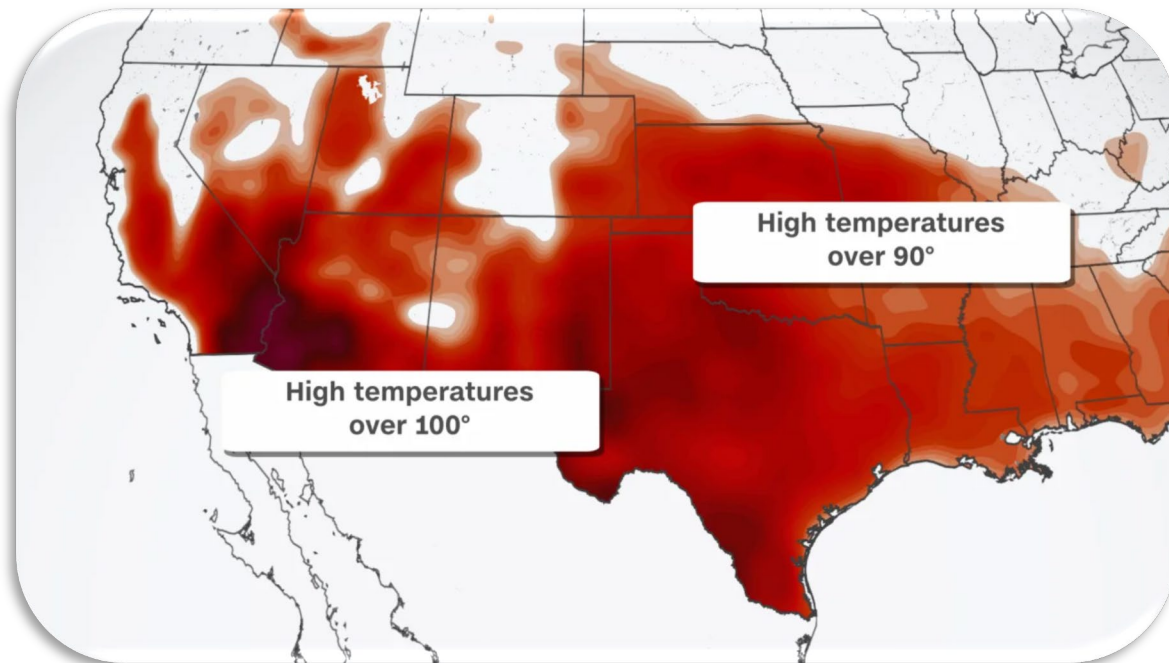


DRAFT  
NOT FOR DISTRIBUTION



# CLOSING REMARKS

Green Grid Inc.



*Image source: Gray, Jennifer. "A New Dangerous Long-Lasting Heat Wave Could Set Dozens of Heat Records, Even in Notoriously Hot Places." CNN, 10 July 2023, [www.cnn.com/2023/07/10/weather/heat-wave-southwest-south-texas-florida/index.html](http://www.cnn.com/2023/07/10/weather/heat-wave-southwest-south-texas-florida/index.html)*





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A California Natural Resources Agency

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Sacramento, CA 95814  
916.902.6000

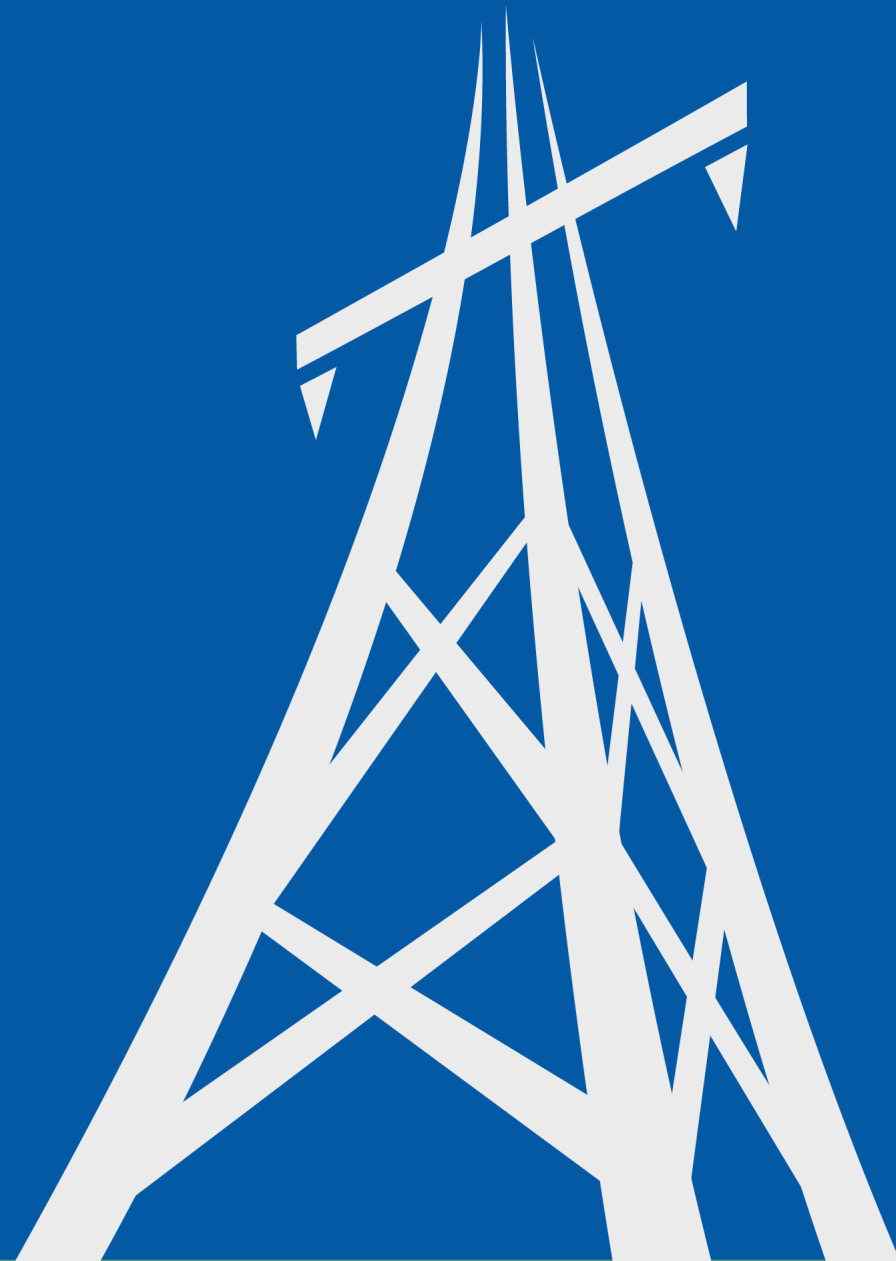


# SAFETY REQUIREMENTS ADDRESSING INCREASING WILDFIRE RISK

Public Workshop



actionable sustainability intelligence®





# WELCOME TO DAY 2

Lucy Morgans, Program Manager,  
Office of Energy Infrastructure Safety

# SAFETY BRIEFING

**Take care of your posture** and sit in a comfortable position

**Take regular breaks** stretch, hydrate, and rest your eyes

**Know the emergency exits and procedures** in your physical location should the need arise

**Keep emergency contact information readily available**

Be prepared for **earthquakes**



**SAFETY FIRST**



Safety Starts Here

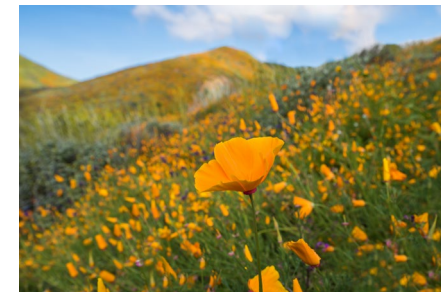
Think Safe...  
Work Safe...  
Be Safe



# HOW TO PARTICIPATE

If you wish to provide input to the discussion:

- Press the “raise hand” button on Zoom, participants will be unmuted in order of hands raised
- Dial-in participants need to press #2 to raise hand
- Use Zoom’s Q&A feature to provide input.





# OBJECTIVES

## Facilitate Stakeholder Feedback

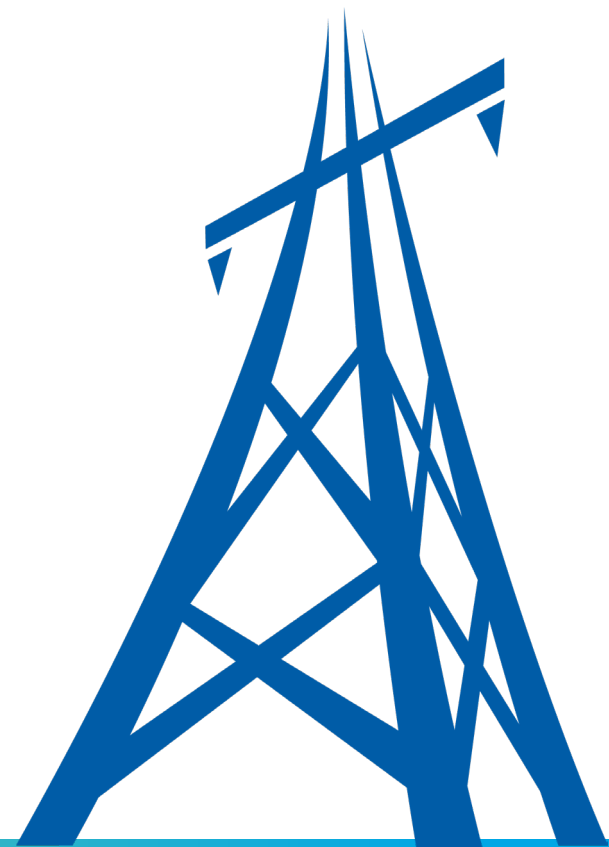
- Listen, understand, and consider the perspectives and insights of our stakeholders

## Promote Public Engagement

- Have a collaborative discussion to explore recommendations for regulations to reduce utility wildfire ignitions and the effects of climate change and aging infrastructure

## Enhance Communication and Transparency

- Provide clear feedback and participate in an open dialogue



# AGENDA OVERVIEW

## DAY 2 – JULY 14

9:30 a.m. – 9:40 a.m.	Welcome and Opening Remarks
9:40 a.m. – 10:40 a.m.	New Construction, System Hardening, and Grid Operations
10:50 a.m. – 11:40 a.m.	Undergrounding
11:40 a.m. – 12:40 p.m.	Lunch
12:40 p.m. – 1:40 p.m.	Asset Replacement and Repair Frequency; Inspection of Assets
1:50 p.m. – 2:50 p.m.	Additional Safety Considerations; Regulatory Change Impact Analysis
2:50 p.m. – 3:10 p.m.	Open Q&A – Any Topic
3:30 p.m.	Closing Remarks



# NEW CONSTRUCTION

Negar Moharrami, Sr. Project Engineer, Ph.D., (Civil Engineering), PE (Civil)  
Green Grid Inc.



# NEW CONSTRUCTION

## Background

### “Building the Electricity Grid of the Future: California’s Clean Energy Transition Plan” Governor Gavin Newsom<sup>1</sup>

- 100% clean energy by 2045 (SB 100)
- Clean energy progress and an implementation plan<sup>1</sup>
- \$2 Billion Clean Energy Package<sup>2</sup>

### New Electric Grid Construction Considering Local Conditions

- Heavy wind load
- Rising temperatures
- Access to water
- Soil conditions

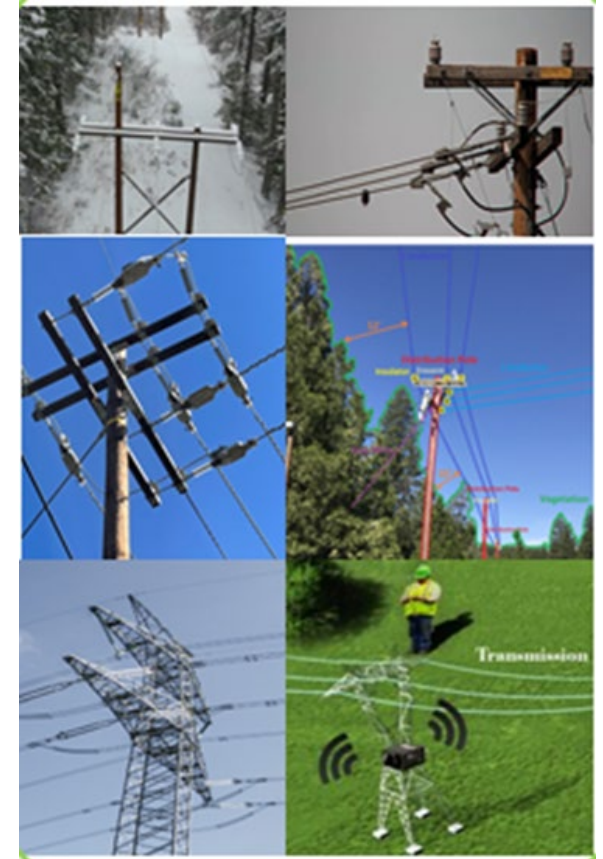


Image source: Green Grid Inc.

<sup>1</sup> California, State of. “Governor Newsom Updates the Roadmap to California’s Clean Energy Future.” *California Governor*, 25 May 2023, [www.gov.ca.gov/2023/05/25/governor-newsom-updates-the-roadmap-to-californias-clean-energy-future/](http://www.gov.ca.gov/2023/05/25/governor-newsom-updates-the-roadmap-to-californias-clean-energy-future/).

<sup>2</sup> “Clean Energy Package.” *The 2022-23 Budget: Clean Energy Package*, 22 Feb. 2022, [lao.ca.gov/Publications/Report/4554](http://lao.ca.gov/Publications/Report/4554).

# NEW CONSTRUCTION

## Observations: Safety Factor

### Opportunity for Specificity in Regulations<sup>1</sup>

- Strength requirements based on grades of construction
- Different safety factors for construction and in-place

### Location

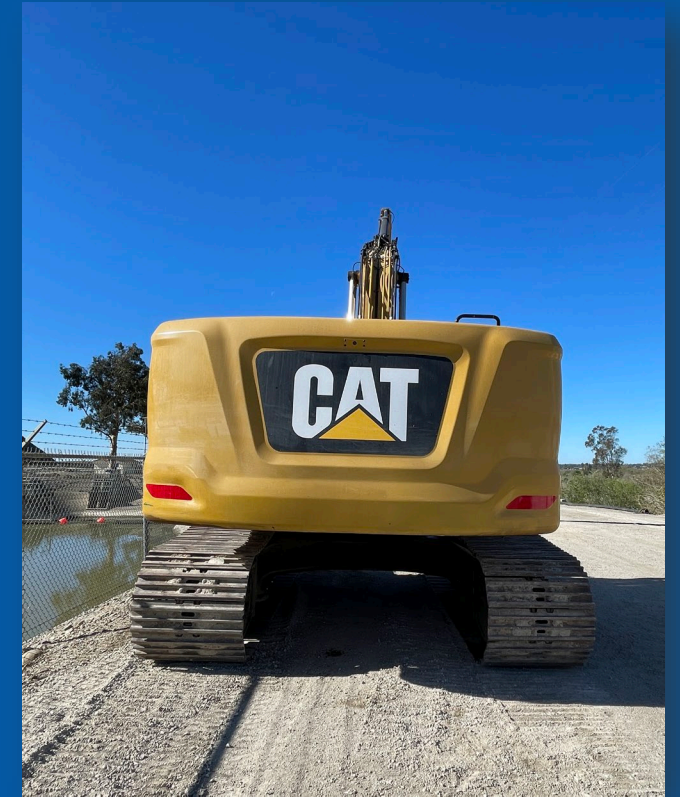
- High Fire Threat Districts and other potential high-risk areas

### Local Conditions

- Local effects and climate change

### Fail-Safe Design

### Sustainable Construction



*Image source: Green Grid Inc.*

<sup>1</sup>GO 95 Rule 44

# NEW CONSTRUCTION

## Observations: Safety Factor (Cont.)

**Safety Factor is the minimum allowable ratios of material and/or line element strengths to the effect of design loads<sup>1</sup>**

- Extreme loads or stresses without failing due to climate change
- Use for designing, constructing, and hardening electric infrastructure
- Wind, ice, or other environmental factors



Image source: Grainger. "3 Most Common Causes of Electrical Accidents - Grainger KnowHow." Grainger.com, 27 Apr. 2017, [www.grainger.com/know-how/safety/electrical-hazard-safety/advanced-electrical-maintenance/kh-3-most-common-causes-electrical-accidents](http://www.grainger.com/know-how/safety/electrical-hazard-safety/advanced-electrical-maintenance/kh-3-most-common-causes-electrical-accidents).

<sup>1</sup>GO 95 Rule 44



# NEW CONSTRUCTION

## Discussion Point 1: Location-Driven Safety Factor

### Locations

- High Fire Threat Districts (HFTDs)
- Specific safety factor requirements for Tier 2 and Tier 3
- Climate change impact/local conditions on the safety factor
- Others

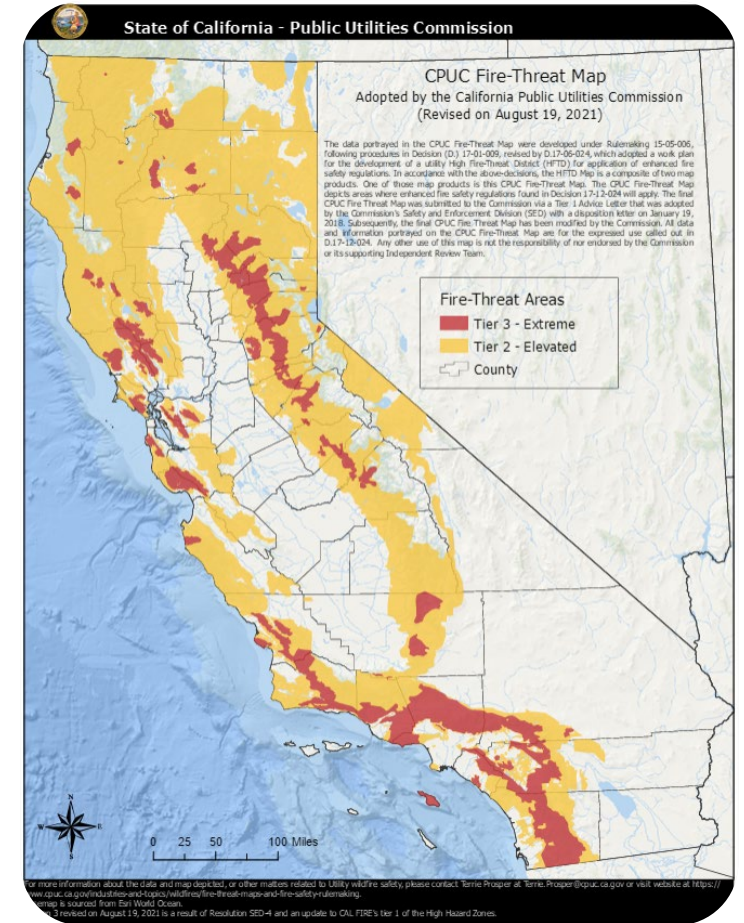


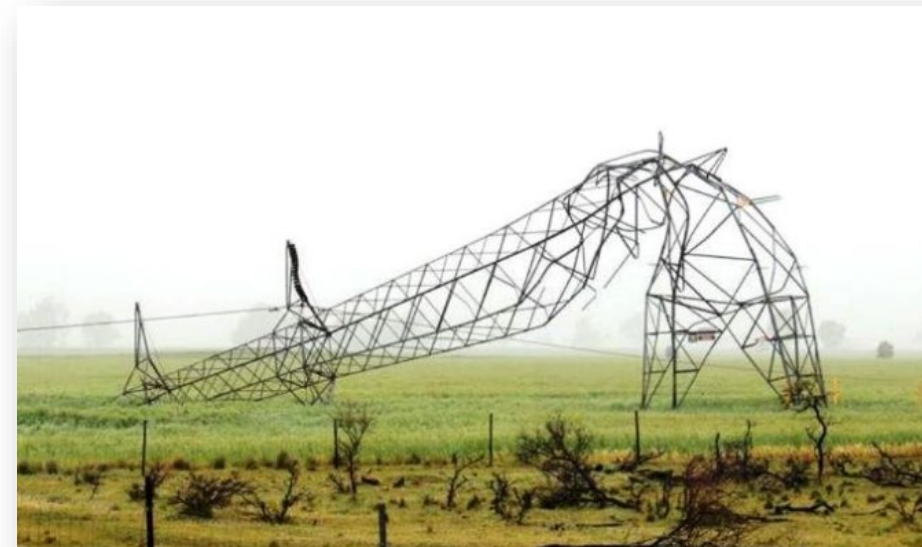
Image source: California Public Utilities Commission (CPUC)

# NEW CONSTRUCTION

## Discussion Point 2: Safety Factor Adjustment

### Safety Factor

- Provide a safety margin that remains after all anticipated loads and stresses
- Reduce the risk of catastrophic failure
- Electrical infrastructure needs to withstand varied conditions and loads due to climate change
- Consider the overall integrity of the power line system



*Image source: Hamzah, Nur & Usman, Fathoni & Omar, Rohayu. (2018). Geospatial study for wind analysis and design codes for wind loading: A review. International Journal of ADVANCED AND APPLIED SCIENCES.*

# SYSTEM HARDENING

Eric Pessima, Sr. Project Engineer, B.S., (Civil Engineering), PMP  
Negar Moharrami, Sr. Project Engineer, Ph.D., (Civil Engineering), PE (Civil)  
Kenneth Lam, Sr. Engineer, B.S., (Electrical Engineering), PE (Electrical)  
Green Grid Inc.



# SYSTEM HARDENING

## Background

### Strengthening and Fortifying Electrical Infrastructure to Enhance Resilience and Resistance to Reduce Wildfires Amid Climate Change

- Covered conductors
- Hardening overhead assets
- Modernizing equipment
- Locational safety factor
- Undergrounding

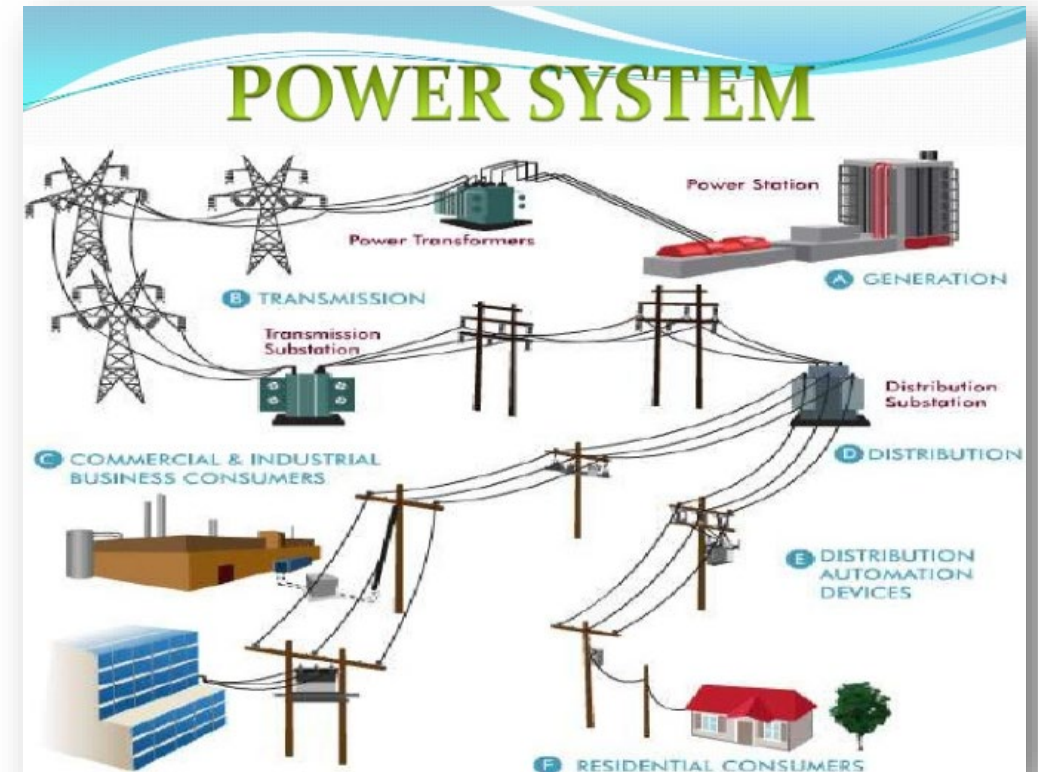


Image source: (2023). Global assembling of Academicians [Photograph]. Allied Academics Conferences. <https://powerengineering.alliedacademies.com/events-list/power-systems>

# SYSTEM HARDENING

## Background: Climate Change and Utility Assets

### Extreme weather conditions

- High wind events: Wire, object, vegetation-to-wire contact
- Storms and Lightning: Equipment failure and Asset ignition
- High temperatures: Asset overheating
- Drought: Dehydrates surrounding vegetation (fuel)

### Focus on High Fire Threat Districts (HFTDs)

#### Importance of System Hardening: Reduce the Risk of Wildfires

- Enhances resilience and safety of assets
- Improves reliability
- Improves operations and maintenance protocols

# SYSTEM HARDENING

## Observations

### Opportunity for Specificity in Regulatory Requirements

#### Design, Construction, and Maintenance<sup>1</sup>

- Safe, proper, and adequate service based on known local conditions

#### Protective Covering Criteria<sup>2</sup>

- Electrical insulating efficiency, impact strength, material-specific criteria, thickness, sunlight resistance, etc.

#### Splices and Taps<sup>3</sup>

- Grade "A" construction requires consent from all parties who own or operate overhead assets
- Splices and taps in Grade "A" construction spans
- Number of splices per span

<sup>1</sup>GO 95 Rule 31.1

<sup>2</sup>GO 95 Rule 22.8

<sup>3</sup>GO 95 Rule 22.6-B, Rule 101.2, Rule 103.1, Rule 49.1, Rule 111.3



# SYSTEM HARDENING

## Observations (Cont.)

### Opportunity for Specificity in Regulatory Requirements

#### Exempt and Non-Exempt Equipment

- Exempt Equipment Table<sup>1</sup>
- Exclusivity to State Responsibility Area (SRA)

#### Pole Replacement/Reinforcement

- Composite
- Steel
- Fire-resistant materials



*Image source: Roberts, David. "California's Wildfire Blackouts Are a Mess. Here Are 3 Key Solutions." Vox, Vox, 22 Oct. 2019, [www.vox.com/energy-and-environment/2019/10/22/20916820/california-wildfire-climate-change-blackout-insurance](http://www.vox.com/energy-and-environment/2019/10/22/20916820/california-wildfire-climate-change-blackout-insurance).*

<sup>1</sup>CAL FIRE California Power Line Fire Prevention Field Guide

# SYSTEM HARDENING

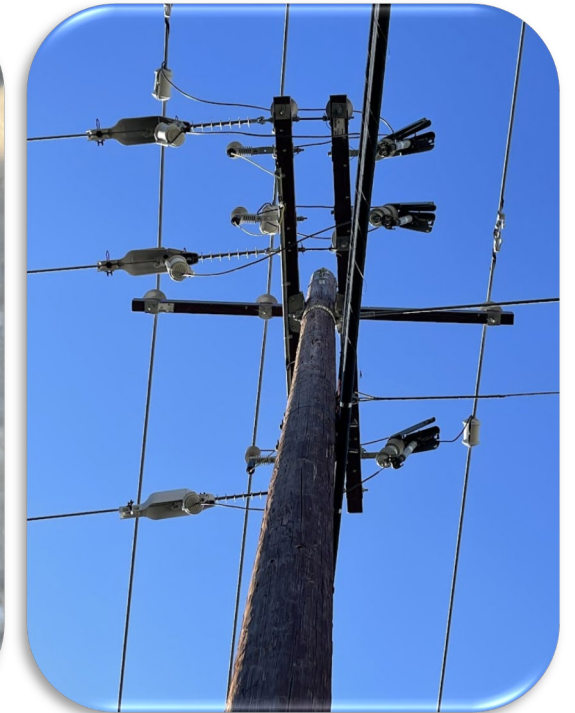
## Discussion Point 1: Covered Conductors

### Benefits

- Reduce risk of phase-to-phase contact
- Reduces wildfire risk
- Improves reliability

### Areas of Ongoing Research

- Materials
- Inspection and Maintenance
- Replacement
- Long-term effectiveness
- Service life
- Potential failure modes



*Image source: Green Grid Inc.*

# SYSTEM HARDENING

## Discussion Point 2: Reduce Splice-Caused Ignitions

### Potential Causes of Asset Ignition

- Damage by environmental conditions
  - Corrosion
  - Moisture
  - Physical damage

### Splices Protection Protocol

- Corrosion inhibitors
- Frequent maintenance/inspection
- Number of splices between spans



*Image source: Murray, Meredith. "ButterflyMX Installation: How to Splice the Power Cable." Video Intercom System for Apartment Buildings | ButterflyMX, 20 Sept. 2020, butterflymx.com/blog/splice-power-cable/*



# SYSTEM HARDENING

## Discussion Point 3: Hardening Aging Assets

### Aging Assets

- Non-exempt equipment
- Potential to spark
- Tendency to overheat
- Higher likelihood of failure

### Modernized and Exempt Equipment

- Single-phase reclosers
- Motorized switch operators
- Rapid Earth Fault Current Limiter (REFCL)
- Exempt surge arresters

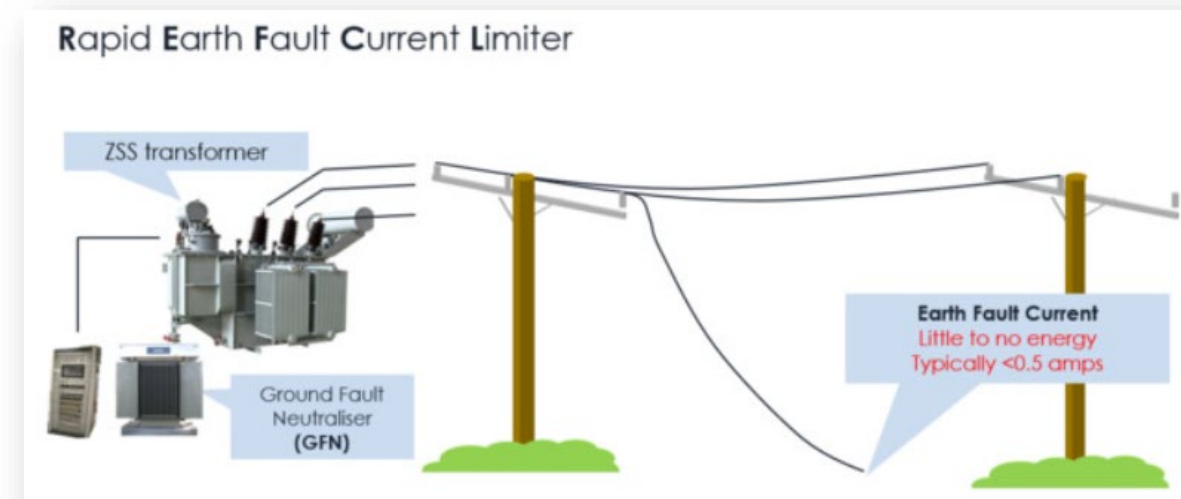


Image source: (2016). U.S. Utilities Apply Wildfire Technology Tested in Australia [Photograph]. Course Cloud.  
<https://www.utilityproducts.com/line-construction-maintenance/article/14198802/us-utilities-apply-wildfire-technology-tested-in-australia>

# SYSTEM HARDENING

## Discussion Point 4: Pole Replacement/Reinforcement

### Pole Replacement

- Composite
- Steel

### Pole Reinforcement

- Fire retardant



*Image source: Green Grid Inc – Underbuild distribution pole*



*Image source: Green Grid Inc – Fire retardant material at the base of a distribution pole*

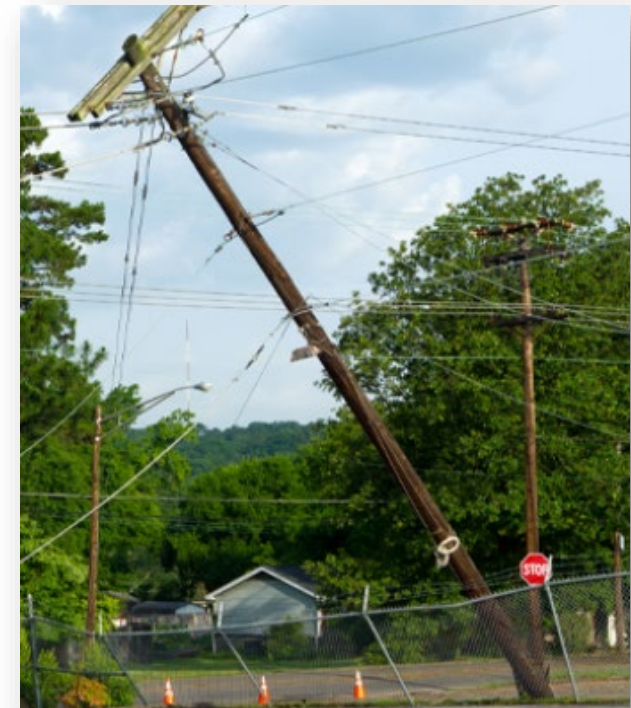


# SYSTEM HARDENING

## Discussion Point 5: Residual Safety Factors vs. Safety Factor

### Residual Safety Factor (RSF)

- Alternative definition for reducing Safety Factor
- Considering the impact of environmental loads in DCR (Demand / Capacity Ratio)
- The RSF account for residual stresses on the structural elements
- Applies to the existing constructions or new construction after installation



*Image source: Robson Forensic. "Utility Pole Failures - Expert Witness Investigations." [www.robsonforensic.com](http://www.robsonforensic.com), 18 Mar. 2022, [www.robsonforensic.com/articles/utility-pole-failure-expert](http://www.robsonforensic.com/articles/utility-pole-failure-expert)*



# GRID OPERATIONS AND PROTOCOLS

Kenneth Lam, Sr. Engineer, B.S., (Electrical Engineering), PE (Electrical)  
Green Grid Inc.

# GRID OPERATIONS AND PROTOCOLS

## Background

### Effective and Safe Operation of the Power Grid

- System automation and protocol
- Minimize the extent and duration of de-energization -  
Public Safety Power Shut-off (PSPS)
- Facilitate the flow of energy
- Reliable functioning of the power grid
- Reduces ignition and wildfire risk
- Achieve grid resilience



*Image source: Green Grid Inc. - Remote activated recloser on composite pole*

# GRID OPERATIONS AND PROTOCOLS

## Observations

### Industry Practices

- Sectionalization
- Automation
- Changing sensitivity of protective device settings (including fast trip settings)
- Line loading and power flow optimization
- PSPS threshold



*Image source: NC Electric Cooperatives. "Advanced Grid Operations." North Carolina's Electric Cooperatives, [www.ncelectriccooperatives.com/energy-innovation/grid-operations](http://www.ncelectriccooperatives.com/energy-innovation/grid-operations)*



# GRID OPERATIONS AND PROTOCOLS

## Discussion Point 1: Mitigating the Impact of PSPS Events

### PSPS Events

- Significant operation challenges
- Grid reliability
- Risk of public safety

### Impact Reduction

- Sectionalizing
- Advanced controls (e.g., SCADA)
- Backup power (battery storage, microgrids, local renewable generation)

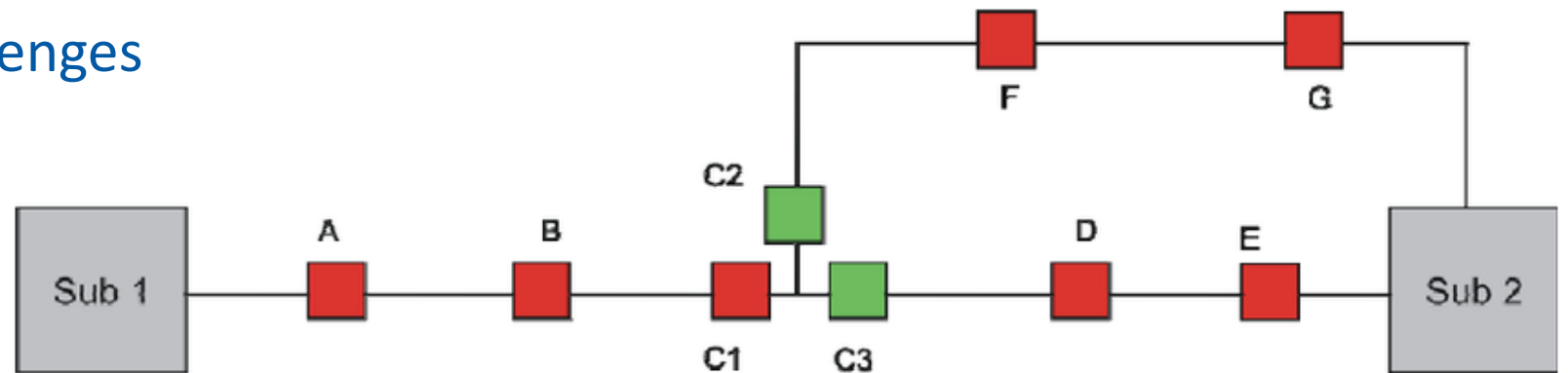


Image source: (2022). Sectionalizing Switches on a Distribution Feeder [Photograph]. ResearchGate. [https://www.researchgate.net/figure/Sectionalizing-Switches-on-a-Distribution-Feeder\\_fig2\\_255217209](https://www.researchgate.net/figure/Sectionalizing-Switches-on-a-Distribution-Feeder_fig2_255217209)

# GRID OPERATIONS AND PROTOCOLS

## Discussion Point 2: Protective Equipment and Device Settings

### Power Outages

- Object contact
- Vegetation
- Animal
- Balloons



### Reducing Wildfire Risk Through Settings

- Reduces time to de-energize
- Rapid response for quicker power restoration
- Automatic power shut-off



*Image source: (2022). Daily Mail Online. "Tree next to a Power Line Bursts into Flames." Mail Online, 28 June 2017, [www.dailymail.co.uk/news/article-4646978/Tree-power-line-bursts-flames.html](http://www.dailymail.co.uk/news/article-4646978/Tree-power-line-bursts-flames.html)*





**NEW  
CONSTRUCTION,  
SYSTEM HARDENING,  
AND GRID OPERATIONS**

Panel Presentations &  
Public Comment  
Discussion





# 10-MINUTE BREAK

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# UNDERGROUNDING

Eric Pessima, Sr. Project Engineer, B.S., (Civil Engineering), PMP  
Green Grid Inc.

# UNDERGROUNDING

## Background

### Physical Relocation of Electrical Lines and Associated Infrastructure Underground

- Reduces ignition drivers
  - Phase-to-Phase Contact
  - Equipment failures
  - Extreme weather (higher temperature, heavy snow, heavy wind)
- Potentially improves safety and reliability



*Image source: Upgraded (n.d.). Underground Electrical Service Cost. Electrical Engineer Portal. <https://electrical-engineering-portal.com/download-center/books-and-guides/power-substations/underground-power-transmission-lines>*



# UNDERGROUNDING

## Observations

### Opportunity for Specificity in Regulations

- **Construction<sup>1</sup>**
  - In accordance with accepted best practice
  - Provision for the safety of workers and the general public
  - Property preservation
- **Maintenance<sup>2</sup>**
  - Maintained to secure the safety of workers and the public in general
- **Environmental Conditions<sup>3</sup>**
  - Location-safe access
  - Maintenance interference with traffic

<sup>1</sup>GO 128 Rule 41.3, 17.1, 17.3

<sup>2</sup>GO 128 Rule 12.2, 22.3, 22.4A

<sup>3</sup>GO 128 Rule 32.8

# UNDERGROUNDING

## Discussion Point 1: Priorities for Wildfire Prevention

### Environmental

- Climate, topology, geological landscape

### Social

- Cultural sensitivities, critical facilities, public safety, emergency response access

### Infrastructure

- Existing and future



*Image source: (2022). Sectionalizing Switches on a Distribution Feeder [Photograph]. ResearchGate. [https://www.researchgate.net/figure/Sectionalizing-Switches-on-a-Distribution-Feeder\\_fig2\\_255217209](https://www.researchgate.net/figure/Sectionalizing-Switches-on-a-Distribution-Feeder_fig2_255217209)*

# UNDERGROUNDING

## Discussion Point 2: Construction Technical Challenges and Factors to Consider



### Post-construction Considerations

- Asset corrosion
- Soil erosion
- Soil type variations (e.g., rock, wetland, hills)
- Existing subsurface utilities

### Possible Mitigation Efforts

- Heat dissipation
- Environmental assessment and geotechnical soil testing
- Erosion and corrosion prevention
- Tailored construction methods



# UNDERGROUNDING

## Discussion Point 3: Updated Construction Techniques for Modern Undergrounding

### Updated Construction Techniques

- Horizontal directional drilling
- Mechanical excavation
- Vibratory plow (rural areas)

### Materials and Equipment Innovations

- Cable-in-Conduit (CIC)
- High-Density Polyethylene (HDPE) Conduit
- Fault indicators



*Image source: (2022). HORIZONTAL DIRECTIONAL DRILLING [Photograph]. SADB.  
<https://www.sadb.com.au/what-we-do/horizontal-directional-drilling/>*

# UNDERGROUNDING

## Discussion Point 4: Revamping Maintenance Protocols for Underground Infrastructure

### Maintenance Protocols

- Voltage tests on the cable sheath
- Tunnel inspection
- Transition stations inspection
- Utility hole/joint pit inspection
- Cable route and crossings inspection
- Securing pad-mounted equipment



*Image source: UpGraded (n.d.). Underground Electrical Service Cost. Run Underground.  
<https://upgradedhome.com/underground-electrical-service-cost/>*

# UNDERGROUNDING

## Discussion Point 5: Improving Underground Infrastructure Potential



### Undergrounding Variables

Cable deterioration

Service disruptions

Cable failures

Slow deployment

High installation costs



### Potential Opportunities

Cable quality improvement

Minimize service disruption strategies

Efficient repair processes

Improved deployment

Cost reduction strategies





# UNDERGROUNDING

Panel Presentations &  
Public Comment  
Discussion





**1-HOUR  
LUNCH  
BREAK**

**DRAFT**  
NOT FOR DISTRIBUTION

# ASSET REPLACEMENT AND REPAIR FREQUENCY

Fred Kahl, Sr. Technical Program Manager, B.S., (Aerospace Eng.), MBA  
Green Grid Inc.



# ASSET REPLACEMENT AND REPAIR FREQUENCY

## Background: Replacement

**Once a structure reaches a reduced safety factor, it needs to be replaced<sup>1</sup>**

### **Grade "A" and "B" construction**

- Safety factors should not fall below two-thirds of standards

### **Grade "C" construction**

- Safety factors should remain above half of required standards

<sup>1</sup>GO 95 Rule 44.3

# ASSET REPLACEMENT AND REPAIR FREQUENCY

## Background: Inspection Requirements

### Electric Distribution and Transmission Facilities Outside of a Substation<sup>1</sup>

- Ensure safe and high-quality electrical service
- Adequacy of inspection timeframes to minimize wildfire risk
- Differing inspection cycles for non-exempt equipment

Table 1  
Distribution Inspection Cycles (Maximum Intervals in Years)

	Patrol		Detailed		Intrusive	
	Urban	Rural	Urban	Rural	Urban	Rural
<b>Transformers</b>						
Overhead	1	2 <sup>1</sup>	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
<b>Switching/Protective Devices</b>						
Overhead	1	2 <sup>1</sup>	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
<b>Regulators/Capacitors</b>						
Overhead	1	2 <sup>1</sup>	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
<b>Overhead Conductor and Cables</b>						
Overhead Conductor and Cables	1	2 <sup>1</sup>	5	5	---	---
<b>Streetlighting</b>						
Streetlighting	1	2	x	x	---	---
<b>Wood Poles under 15 years</b>						
Wood Poles under 15 years	1	2	x	x	---	---
<b>Wood Poles over 15 years which have not been subject to intrusive inspection</b>						
Wood Poles over 15 years which have not been subject to intrusive inspection	1	2	x	x	10	10
<b>Wood poles which passed intrusive inspection</b>						
Wood poles which passed intrusive inspection	---	---	---	---	20	20

<sup>1</sup>GO 165

# ASSET REPLACEMENT AND REPAIR FREQUENCY

## Observations

### Opportunity for Specificity in Regulations<sup>1</sup>

- Inspection cycle maximum set depending on asset and location
- Asset lifecycles are not always predictable and may not conform to an inspection/replacement cycle
- Determine optimal replacement timing
- Determine optimal inspection frequency

CPUC Reportable Number of Equipment Involved in Ignitions per Year (one IOU)



<sup>1</sup>GO 165



# ASSET REPLACEMENT AND REPAIR FREQUENCY

## Discussion Point 1: Hard-time vs Condition-based Maintenance

**Hard time (set schedule) vs. condition-based maintenance balancing to reduce wildfire risk**

**Optimal inspection frequencies to reduce wildfire risk**

- Reliability Centered Maintenance (RCM)
- Risk-based prioritization of inspections to reduce wildfire risk

# INSPECTION OF ASSETS

Fred Kahl, Sr. Technical Program Manager, B.S., (Aerospace Eng.), MBA  
Green Grid Inc.

# INSPECTION OF ASSETS

## Background

- **Pivotal role in the safe and reliable operation and maintenance of electrical infrastructure**
  - Maintains safety standards
  - Ensures the safety of both personnel and public
  - Improved reliability
- **Inadequate inspections may carry unidentified risks in the powerline system**
- **Identified risks may be resolved in time to mitigate wildfire risk**



*Image source: Green Grid Inc.*



# INSPECTION OF ASSETS

## Observations

### Opportunity for Specificity in Regulations<sup>1</sup>

- Frequency and rigor of inspections for in-service and out-of-service lines
- Corrective finding resolution/corrective action timeline

### Compliance/Time-Based Inspection vs Risk-Based Inspection

- Inspection could be targeted based on risk

### Type of inspection methodology

- Patrol
- Detailed
- Other (technology-enhanced, aerial and terrestrial sensors)



*Image source: Green Grid Inc.*

<sup>1</sup>GO 165

# INSPECTION OF ASSETS

## Discussion Point 1: Inspection Frequency and Corrective Action Timelines

### Compliance-Based and Risk-Based Frequency

- Risk-focused, resource-efficient, effective results
- Target risk mitigation, resource optimization, enhanced safety
- Removes complexity, subjectivity, and regulatory compliance challenges



*Image source: Helicopters inspecting local power lines using infrared, ultraviolet technology | Chronicle Telegram*

# INSPECTION OF ASSETS

## Discussion Point 2: Technology-Enhanced Inspections

### Existing Inspection Types for Equipment:

- Patrol inspection, detail inspection, and intrusive inspection

### Technology-Enhanced Inspection Techniques:

- Infrared
- Non-destructive testing
- AI-enabled smart sensor
- GIS
- Data-driven



Image source: Drone Power Solutions. "Drone Inspections Are Improving Efficiency in the Utilities Industry." Leading Drone Company | Drone Service Provider, 23 Sept. 2020, [feds.ae/drone-inspections-in-utilities-industry/](https://feds.ae/drone-inspections-in-utilities-industry/)





**JOINT ASSET  
REPLACEMENT AND  
REPAIR FREQUENCY;  
INSPECTION OF ASSETS**

Panel Presentations &  
Public Comment  
Discussion





# 10-MINUTE BREAK

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# ADDITIONAL SAFETY CONSIDERATIONS

Fred Kahl, Sr. Technical Program Manager, B.S., (Aerospace Eng.), MBA  
Green Grid Inc.



# ADDITIONAL SAFETY CONSIDERATIONS

## Background: Continuing Analysis and Surveillance System (CASS)

- Practiced in the aviation industry since 1964
- Follows Federal Aviation Administration (FAA) safety framework
- CASS to prevent wildfires
  - Identifying potential hazards
  - Environmental monitoring
  - Early warning system
  - Measurement vs Modeling
  - Proactive maintenance
  - Continuous improvement



Image source: [https://www.faa.gov/about/plans\\_reports/media/fy20\\_avs\\_wfp](https://www.faa.gov/about/plans_reports/media/fy20_avs_wfp)

# ADDITIONAL SAFETY CONSIDERATIONS

Background: Statistical Analysis for Scheduled Maintenance Optimization (SASMO)

## SASMO to prevent wildfires

- Data collection
- Failure rate modeling
- Maintenance program optimization
- Proactive measures



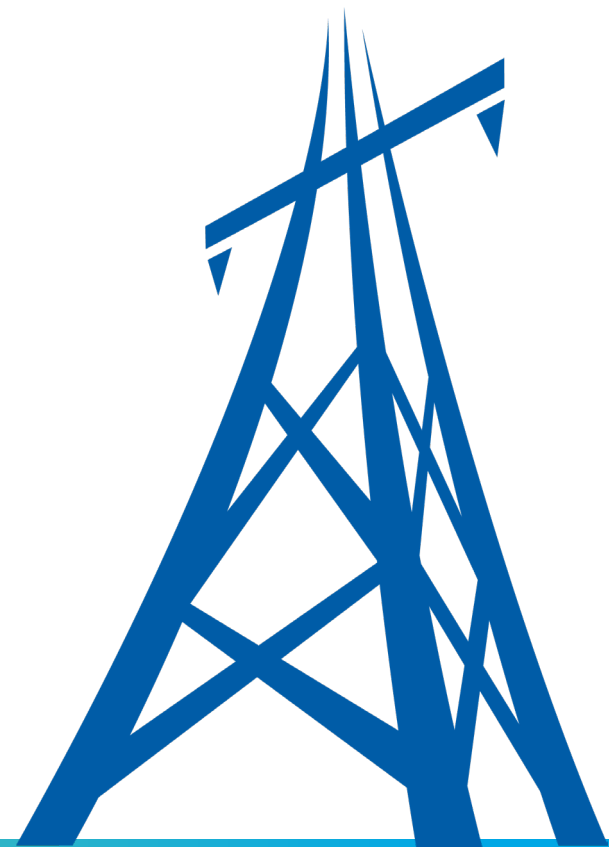
*Image source: <https://www.istockphoto.com/photos/electric-lineman>*

# ADDITIONAL SAFETY CONSIDERATIONS

## Observations

### Opportunity for Specificity in Regulatory Requirements<sup>1</sup>

- Transitioning maintenance program from time/compliance based to risk-prioritized/condition-based program
- Adopting aviation industry inspired practices



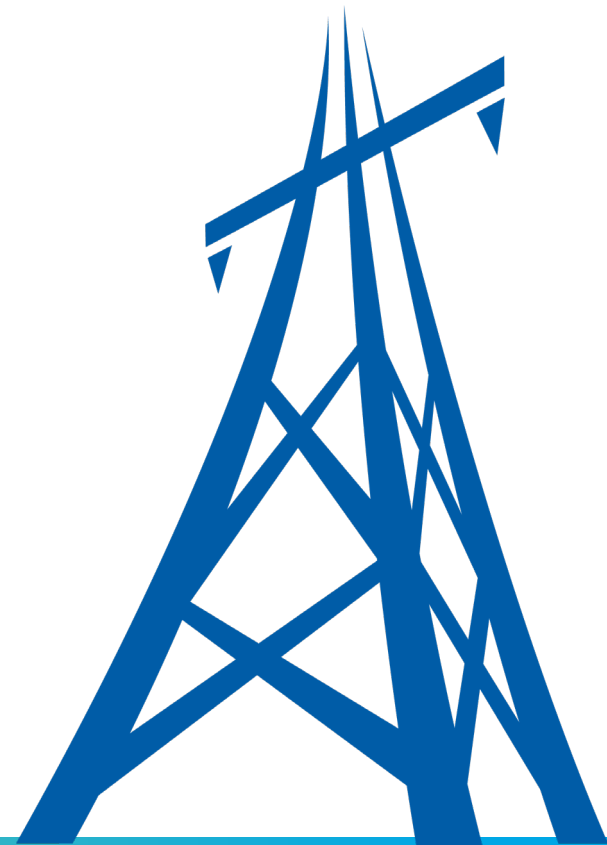
<sup>1</sup>GO 165



# ADDITIONAL SAFETY CONSIDERATIONS

## Discussion Point 1: Electronworthiness

- Framework designed to maximize safety and minimize wildfire risk for electric utilities
- Replicated from FAA airworthiness
- Proven for safety-critical practices in operations and maintenance
- Adopting to design, construction, maintenance, and operations of electric utility equipment and support structures
- Resulting significant reduction in wildfire risk



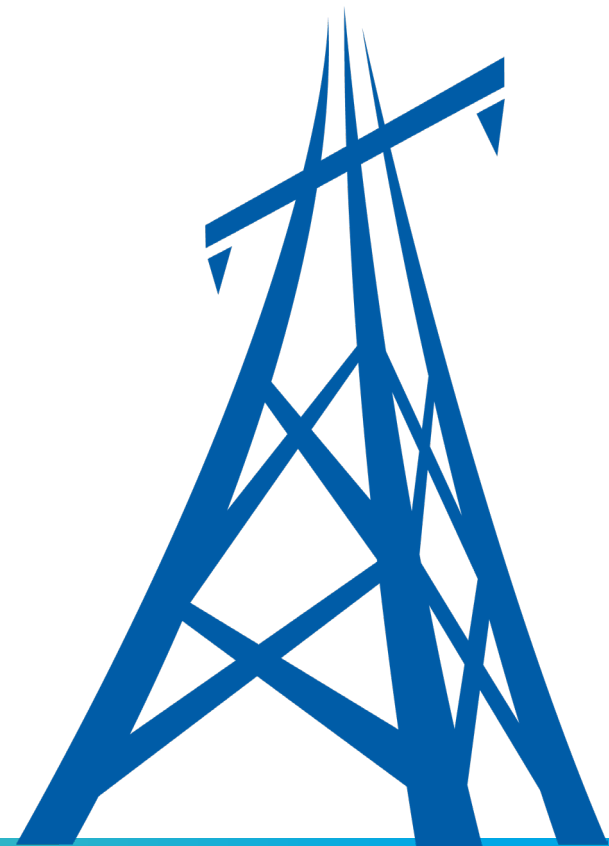
# POTENTIAL REGULATORY CHANGE IMPACTS

Amy Chiang, Organizational Change Consultant, Ph.D. (Human and Organizational Systems),  
M.A. (Human Development), M.S. (Organizational Change Management)  
Green Grid Inc.

# POTENTIAL REGULATORY IMPACTS

## Background: Metrics to Consider

- Burned Area (Acres) – the size of the affected ecosystem, the scale of habitat loss, etc.)
- Carbon Emissions (Metric Tons of CO<sub>2</sub>) - carbon emissions from wildfires and their contribution to greenhouse gas concentrations
- Air Quality Index (AQI) - human health and ecosystem vitality
- Economic Losses – impact on individuals, communities, and the state as-a-whole (e.g., cost of firefighting, property damage)





# POTENTIAL REGULATORY IMPACTS

## Background: Social Impacts

- **Displacement and Evacuation**
- **Loss of Life and Injury**
- **Health Effects (including mental health)**
- **Community Disruption**
- **Equity and Social Vulnerability**
- **Emergency Response and Resources**



*Image source: Reuters. (2018, November 9). Northern California wildfire leaves town in ruins, thousands flee. The Indian Express. <https://indianexpress.com/article/world/northern-california-wildfire-chico-city-5439626/>*

# POTENTIAL REGULATORY IMPACTS

## Background: Economic Impacts

- **Property damage and loss**
- **Disruption to businesses**
- **Agricultural losses**
- **Insurance losses**
- **Emergency response and resources**



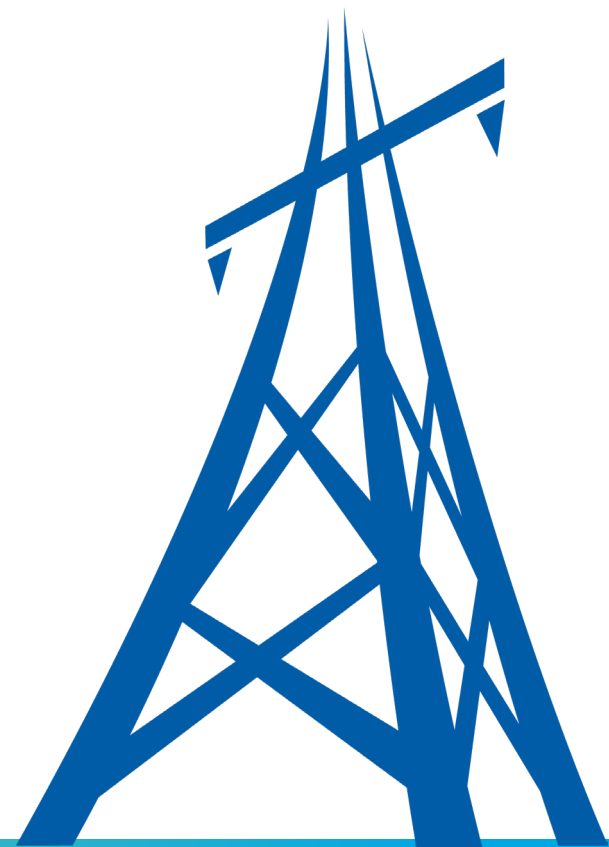
Food inventory from the Verde Mexican Rotisserie restaurant had to be discarded after a two-week evacuation order due to the Caldor Fire in South Lake Tahoe. Photo courtesy of Domi Chavarria.

*Image source: Gedye, G. (2021, October 11). How much do wildfires really cost California's economy? CalMatters. <https://calmatters.org/economy/2021/10/california-wildfires-economic-impact/>*

# POTENTIAL REGULATORY IMPACTS

## Discussion Point 1: Vegetation Management

- **Cost and Resources:** requires funding, skilled personnel, and equipment – can be more demanding for smaller budgets
- **Stakeholder Opposition:** residents, private landowners, and timber companies may challenge the feasibility
- **Scheduling and Timing:** weather, seasonal restrictions, and wildlife nesting periods may add complexity and reduce flexibility
- **Regulatory/Legal Considerations:** environmental law, and securing permits play a role

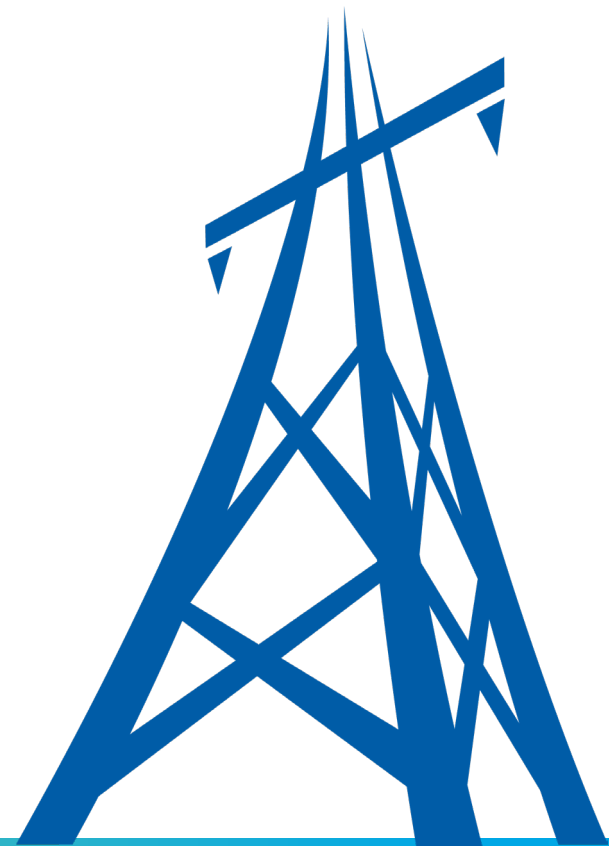




# POTENTIAL REGULATORY IMPACTS

## Discussion Point 2: Undergrounding

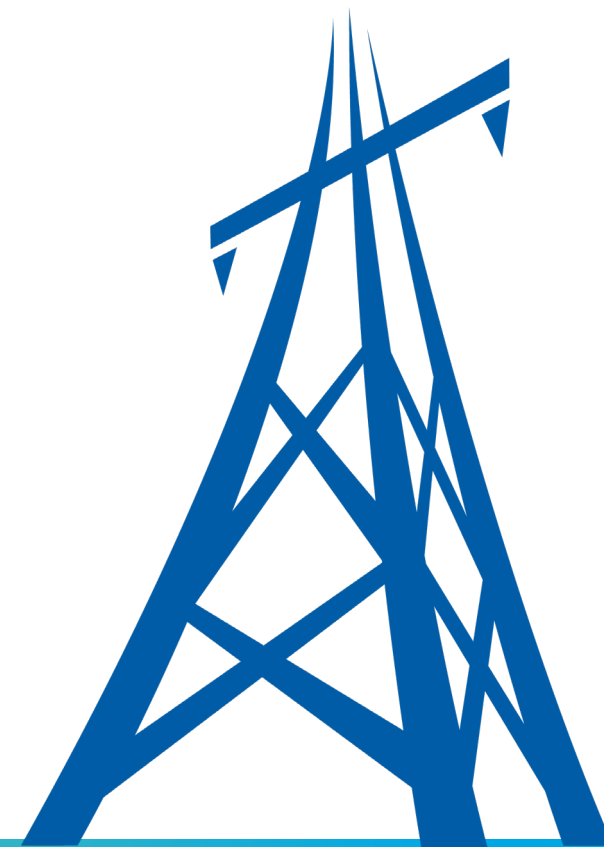
- **High Cost:** The cost of trenching, and cable installation, can be substantial – disproportionately affects communities/regions with limited resources
- **Maintenance and Repair:** More costly to maintain
- **Long Project Timelines:** Causes inconvenience to communities during the construction phase
- **Environmental Impact:** Excavation and trenching can disrupt natural habitats, impact soil quality, and require the removal of trees and vegetation



# POTENTIAL REGULATORY IMPACTS

## Discussion Point 3: Power Line Inspections

- **Frequency and Timing:** Finding the appropriate balance between inspection frequency and resource utilization is crucial
- **Weather Dependency:** High winds, heavy rainfall, or extreme temperatures can impact the safety and feasibility of inspections
- **Cost and Resources:** Requires financial resources, skilled personnel, and appropriate equipment, this may be challenging for smaller budgets







**JOINT  
ADDITIONAL SAFETY  
CONSIDERATIONS;  
POTENTIAL REGULATORY  
IMPACTS**

Panel Presentations &  
Public Comment  
Discussion



# SURVEY



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# NEXT STEPS AND CLOSE OUT

- Energy Safety is accepting written comments until July 28. These should be filed in the Energy Safety E-Filing system to the Wildfire Safety Requirements Recommendations docket (#2023-WSRR).
- Public input will be considered by Energy Safety when developing recommendations for safety requirements to address the increasing risk from climate change and aging infrastructure.
- Energy Safety anticipates providing the CPUC with these recommendations in the fall of 2023.
- These recommendations will feed into the formal CPUC proceeding, the climate change adaptation proceeding, which will be exploring changes to the existing safety requirements starting in the second half of 2023.





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**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**  
A California Natural Resources Agency

715 P Street, 20th Floor  
Sacramento, CA 95814  
916.902.6000





# SAFETY REQUIREMENTS ADDRESSING INCREASING WILDFIRE RISK

Public Workshop



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