



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

August 22, 2024

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

*Electronically Filed to Docket # 2023-2025-WMPs*

**RE: Rural County Representatives of California Reply Comments on Group 2  
2025 Wildfire Mitigation Plan Updates**

Dear Director Thomas Jacobs:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to offer reply comments on the 2025 Wildfire Mitigation Plan (WMP) Updates for investor-owned utilities identified in Group 2; more specifically Liberty Utilities<sup>1</sup> and PacifiCorp. RCRC is an association of forty rural California counties, and our Board of Directors is comprised of elected supervisors from each member county.

Wildfire Mitigation Plans are vital to drive thoughtful ratepayer investments into safe, reliable energy delivery to preserve quality of life, natural resources, and achieve statewide climate change goals. Communities across California have experienced great financial hardships in attempting to recover from catastrophic wildfire events and in mitigating the risk of consequences, including implementing home hardening measures and maintaining defensible space. Safeguarding California's residents from future harm resulting from a utility-caused wildfire event is one of RCRC's primary public policy objectives.

### **Liberty Utilities**

RCRC supports recommendations by the Public Advocates Office (Cal Advocates) to require Liberty to report on the implementation of its Sensitive Relay Profile (SRP) program.<sup>2</sup> RCRC has overarching concerns with energy reliability in rural, fire-prone

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<sup>1</sup> We acknowledge that recently, on August 19, 2024, Energy Safety rejected Liberty's 2025 WMP Update and ordered it to be resubmitted.

<sup>2</sup> *Comments of the Public Advocates Office on Liberty's 2025 Wildfire Mitigation Plan Update*, (August 12, 2024), page 3.

communities and the liability that power outages shift onto public agencies, communities, and customers. While RCRC does not oppose the reasonable use of fast-trip settings to reduce the risk of igniting catastrophic wildfires, we do seek a greater examination of these programs given the growing reliance to use these mitigations potentially long-term. All utilities should, for example, use standardized metrics more consistently when monitoring and reporting on these programs. Liberty, moreover, may not have adequately calculated and considered SRP effectiveness in the context of their service territory<sup>3</sup> and should be required to justify its program.

RCRC also shares concerns highlighted by Cal Advocates that Liberty is decelerating system hardening improvements, such as the installation of covered conductor, in order to accommodate SRP implementation.<sup>4</sup> A correlated, durable mitigation strategy should be in place to reduce the occurrence of outage consequences, especially on circuits prone to repeated outages. Liberty must more judiciously balance and plan system hardening (i.e. installation of covered conductor) with the customer impacts that abrupt, unplanned outages from poor SRP implementation can wreak.

## **PacifiCorp**

RCRC likewise agrees with Cal Advocates that, “PacifiCorp’s lack of predetermined weather and fuel thresholds is problematic” with regard to the Public Safety Power Shut-offs (PSPS) program.<sup>5</sup> PacifiCorp’s program is over reliant on subjective decision-making and should include a set of quantitative assessments.<sup>6</sup> Similarly, RCRC shares the concerns raised by Cal Advocates that PacifiCorp must prioritize optimizing their fast-trip settings given high outage circuits and major reliability issues.<sup>7</sup>

Like GPI, RCRC supports microgrid advancement opportunities to meet energy reliability needs in rural, high fire threat areas and agrees that PacifiCorp should supply details on their new microgrid program.<sup>8</sup> RCRC further agrees that more transparency is needed regarding PacifiCorp’s feasibility studies of their microgrid initiative within the WMP Update and such information should not be restricted to the data request process.<sup>9</sup>

Lastly, both Cal Advocates and GPI raise legitimate concerns with PacifiCorp’s reported data and data verification procedures (e.g. quality assurance and quality control

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<sup>3</sup> *GPI Comments on the Group 2 WMP Updates*, (August 12, 2024), page 36-38.

<sup>4</sup> Cal Advocates, 6-8.

<sup>5</sup> *Comments of the Public Advocates Office on PacifiCorp’s 2025 Wildfire Mitigation Plan Update*, (August 12, 2024), page 3.

<sup>6</sup> *Ibid*, 4.

<sup>7</sup> *Ibid*, 8.

<sup>8</sup> GPI, page 9.

<sup>9</sup> *Ibid*, 10.

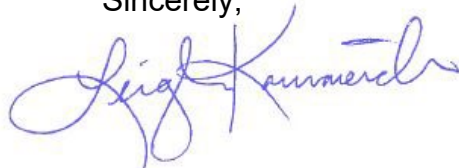
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procedures) that should be remedied prior to the upcoming 2026-2028 comprehensive or base WMP.

## **Conclusion**

Finally, while we understand that ratepayer impacts are more fully considered by the CPUC, we appreciate the added scrutiny by stakeholders and Energy Safety staff through this process to ensure the prudent use of limited ratepayer funds given the escalating affordability crisis on California customers. Thank you for your consideration of our comments. Should you have any questions, please do not hesitate to contact me at (916) 447-4806 or [lkammerich@rcrcnet.org](mailto:lkammerich@rcrcnet.org).

Sincerely,

A handwritten signature in blue ink that reads "Leigh Kammerich". The signature is fluid and cursive, with the first name "Leigh" being more prominent and the last name "Kammerich" following in a similar style.

LEIGH KAMMERICH  
Policy Advocate