



20285 S. Western Ave., #100
Torrance, CA 90501
(310) 371-7222
sbccog@southbaycities.org
www.southbaycities.org

December 10, 2018

Michael Picker, President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Submitted via email: public.advisor@cpuc.ca.gov

RE: Proceeding R. 18-10-007 Wildfire Mitigation Plans

Dear President Picker,

The South Bay Cities Council of Governments (SBCCOG) appreciates the opportunity to provide comment on proceeding R. 18-10-007 regarding investor-owned utilities (IOUs) wildfire mitigation plans. As California's wildfire season has grown longer and wildfires have become more and more devastating and destructive, we value the California Public Utilities Commission's leadership in addressing this important issue.

City and County governments have been at the forefront of wildfire and disaster preparedness and response, and continued work is needed as the threat and danger of these disasters increases. **Therefore, the SBCCOG requests that IOUs coordinate with local governments and agencies in their service territory when developing wildfire mitigation plans.**

This issue is particularly important to cities we represent in the South Bay region of Los Angeles County. The Palos Verdes Peninsula has been designated as a Very High Fire Hazard Severity Zone as recommended by CALFIRE. Frustration has been expressed that Southern California Edison (SCE) spends a lot of money replacing, raising, and upgrading their overhead lines but won't use the money to underground those lines. Moreover, not only does it take forever to underground, they charge a lot of money. We request that the CPUC consider requiring SCE with its telecom counterparts to underground or give cities the option of applying for and supplementing their replacement with upgrading funds for undergrounding. Additionally, the CPUC should consider changing the rules for Rule 20A and Rule 20B to make the funds eligible for undergrounding anywhere (not just in certain circumstances like along arterials).

Other programs that should be considered in light of our wildfire responses, the IOUs in their wildfire mitigation plans should work with and even contribute to cities and our Fire Departments to provide fire safety weed abatement, tree replacement and in general, landscape management around their power lines. For example, in Palos Verdes Estates, they have very old big trees that are some of the worst in a fire (pine, eucalyptus and palms). If funds were available, they could replace them with young, different (more fire resistant) trees or have a more aggressive trimming program.

And finally, it is our understanding that SCE has been resistant to having transformers underground, preferring to have them high on a pole. The CPUC may have given the utility the authority in this matter. Maybe the CPUC in High Fire Safety Zones could require all transformers to be underground at the IOU's expense.

LOCAL GOVERNMENTS IN ACTION

Carson El Segundo Gardena Hawthorne Hermosa Beach Inglewood Lawndale Lomita
Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

New utility wildfire mitigation plans will have numerous direct effects on local governments, including receipt of notifications, recloser and deenergizing protocols, plans for restoring service, and vegetation management. Specifically, protocols for deenergizing utility lines have important effects on residents, businesses, and city operations. In response to power outages, cities respond by changing traffic signals, a labor-intensive transition that requires city staff time. Local governments are also likely to be affected by any changes in vegetation management procedures and would appreciate the opportunity to work with utilities on changes to such policies. Furthermore, cities and other local governments would like the opportunity to coordinate with utilities to ensure notice is provided to hospitals, businesses, and residents that rely on electrical service.

For these reasons, the SBCCOG requests the Commission require IOUs to coordinate with local governments when developing wildfire mitigation plans. Thank you for considering our comments. If you have any questions, please feel free to contact SBCCOG Executive Director, Jacki Bacharach, at (310) 371-7222.

Sincerely,

Britt Huff, SBCCOG Chair
Mayor, Rolling Hills Estates