



CITY OF  
*Palos Verdes Estates*

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December 11, 2018

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

*Submitted via email:* [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov)

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

Dear President Picker,

Thank you for the opportunity to provide comments for the 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, the California Public Utilities Commission's leadership in addressing public safety is important.

Through our experiences in responding to fires ranging back to the Oakland fire in the 1990s, routine and on-going training, and local prevention efforts, cities and counties have been at the forefront of wildfire and disaster preparedness and response. However, continued work in prevention is needed as the threat and danger of these disasters increases! This letter requests that the California Public Utilities Commission develop policies, regulations and requirements that result in IOU's support and participation in local government's goals, programs and projects that, again, are justified based on our actual and demonstrated experience, knowledge, training, and funding. Ultimately, we request that the IOUs coordinate and work with local governments in their service territory to implement wildfire mitigation plans that serve in the public interest and the community.

This issue is particularly important to cities in the South Bay region of Los Angeles County where additional preventative fire safety measures can be implemented by the IOU in partnership with cities. Palos Verdes Estates along with the three other cities on the Palos Verdes Peninsula (Rolling Hills Estates, Rolling Hills and Rancho Palos Verdes) is designated as a Very High Fire Hazard Severity Zone. Southern California Edison (SCE) as the IOU spends a lot of money replacing, raising, and upgrading their overhead lines on hillsides and in undeveloped highly vegetated open space (e.g., using helicopters) but won't use the money to underground those lines.

Moreover, the responsiveness to interest and implementation in local underground projects is significantly slow and a high cost.

It is well known that the failure of overhead electrical lines and transformers, and wind, have been the root cause of several wildland fires. As such, it is requested that the CPUC consider, for example,

requiring SCE with its telecom counterparts to underground its infrastructure or give cities the option of applying for and supplementing their replacement and upgrade projects with 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 or view corridors).

Another program that should be considered in light of wildfire response is having the IOUs work with and even contribute to cities and Fire Departments toward fire safety weed abatement, tree replacement and in general, landscape management around their power lines. In Palos Verdes Estates, we have very old big pine and eucalyptus trees that are some of the worst in a fire. With cities' increasingly limited funds and even more challenges for generating revenue, the IOUs' contributing for landscape management from rates could significantly improve fire prevention efforts. For example, if funds were available for cities to replace trees with young, fire resistant trees or for a more aggressive tree trimming and landscape maintenance, more fire fuels would be reduced.

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

In summary, 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, for example, cities respond by changing traffic signals which is a labor-intensive transition. 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. Finally, it is important for cities and other local governments to have the opportunity to prepare for outages with hospitals, businesses, and residents that rely on electrical service.

For these reasons, it is requested that the California Public Utilities Commission develop policies, regulations and requirements that result in IOU's support and participation in local government's goals, programs and projects and that IOUs to coordinate with local governments when developing wildfire mitigation plans.

Thank you for considering these comments.

Sincerely,



Betty Lin Peterson  
Mayor



Anton Dahlerbruch  
City Manager

c: Palos Verdes Estates City Council  
South Bay Cities Council of Governments  
League of California Cities  
City of Rolling Hills Estates  
City of Rolling Hills  
City of Rancho Palos Verdes  
Los Angeles County Supervisor Janice Hahn, 4<sup>th</sup> District  
Los Angeles County Fire Chief Daryl Osby