

# South Bay Cities Council of Governments

December 10, 2018

TO: SBCCOG Steering Committee

FROM: Jacki Bacharach, SBCCOG Executive Director

RE: CPUC Wildlife Mitigation Plan Comments

*Goal B: Regional Advocacy - Advocate for the interests of the South Bay.*

## Background

The California Public Utilities Commission has asked cities to provide comments on proceeding dealing with Investor Owned Utility Wildlife Mitigation Plans by December 15. Palos Verdes Estates City Manager Tony Dahlerbruch asked if the SBCCOG could provide comments on behalf of all of the cities.

Rolling Hills Estates City Manager and Chair of the City Managers' Group, Doug Prichard, sent an e-mail to all of the city managers asking if they wanted to provide comments. No other responses were received.

The comment from the Palos Verdes Estates City Manager was as follows:

*The Peninsula is a Very High Fire Safety Zone so the CPUC discussion is relevant to us. Assuming that we'd bleed into other cities in a fire scenario and/or call on mutual aid, it could be a regional issue.*

*I have repeatedly heard frustration that SCE spends lots of money replacing, raising, and upgrading their overhead lines but won't use the money instead to underground those lines. Moreover, not only does it take forever to underground, they charge a lot of money. Maybe we could advocate that the CPUC require SCE with its telecom counterparts to underground or have them give cities the option of applying and supplementing their replacement and upgrading money for undergrounding. Another thought...Change the rules for Rule 20A and Rule 20B to make the funds eligible for undergrounding anywhere (not just in certain circumstances like along arterials).*

*Brainstorming...SCE will hack and top trees that get close to lines. I'm not aware they do much else. Maybe SCE could be compelled to work with and contribute to cities and our Fire Departments to provide fire safety weed abatement, tree replacement and in general, landscape management. For example, we have aged big trees that are some of the worst in a fire (pine, eucalyptus and palms). If we had more \$\$, we might be able to replace them with young, different (more fire resistant) trees or have a more aggressive trimming program, thus thinning and replacing the existing ripe fuel for a fire.*

*Finally, I recall that SCE has been resistant to having transformers underground, preferring to have them high on a pole. I believe 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 SCE's expense.*

**RECOMMENDATION**

Develop a letter for the SBCCOG to send using the points that are raised above and circulate it to the City Managers for their comments before submission on December 15.



1400 K Street, Suite 400 • Sacramento, California 95814  
Phone: 916.658.8200 Fax: 916.658.8240  
www.cacities.org

November 27, 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,

The League of California Cities® appreciates the opportunity to comment on proceeding R. 18-10-007 regarding investor-owned utilities (IOUs) wildfire mitigation plans. Californians rely on energy for basic services and on energy providers to get it to us safely. We appreciate the leadership of the California Public Utilities Commission in addressing the increasingly devastating and destructive wildfires California has faced in recent years.

Local governments across California have long been at the forefront of wildfire and disaster preparedness and response. With the trends of increasing wildfire severity, strengthening safety, and other policies to protect against these disasters are critical.

**The League requests that IOUs coordinate with local agencies in their service territory when developing wildfire mitigation plans.**

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, we request the Commission consider our request that utilities coordinate with local governments. Thank you for considering our comments. If you have any questions, please feel free to contact me at (916) 658-8250.

Sincerely,

A handwritten signature in blue ink that reads "Erin Evans-Fudem".

Erin Evans-Fudem  
Legislative Representative