

December 5, 2018

CPUC Office of the Safety Advocate (OSA)
Preliminary Comments to the Joint Utility proposed Wildfire Mitigation Plan
Template

II. Description of the preventive strategy or programs to minimize risk of electric lines and equipment causing wildfires (including consideration of the dynamic climate change risk)

- **This should explicitly include all electric infrastructure including transmission, substations, and more.**

III. Risk Analysis and Risk Drivers

- **RAMPs are useful but are on a 3-year cycle. Additional data is useful to this proceeding. This includes past and recent lessons learned and utility experience with wildfires and mitigation programs. Root cause analyses data should be gathered and included on near misses, incidents, and major events and applied to develop mitigation programs and systemic corrective actions.**
- **Effectiveness of mitigation programs should be included and supported by data in proposals and evaluated on a recurring basis.**
- **Risk Analysis should include not only distribution, but all electric infrastructure, including transmission, substations, and more.**

IV. Wildfire Prevention Strategy and Programs

- **OSA supports workshops to gather more information on the most effective mitigation alternatives and expanding and evaluating the initial list in the template. OSA believes such workshops should be expedited and ongoing to help inform and share lessons learned among all parties.**
- **“D. Vegetation Management Plan” is unnecessarily specific for a template. While these items may be considered, they should not limit the scope of Wildfire Mitigation Plans**
- **Effectiveness of mitigation program should be evaluated on a recurring basis and reported to the Commission. These evaluations should be explicitly included in the scope of this proceeding.**
- **Item IV should address not only electrical distribution lines and equipment, but also include all electric infrastructure, including transmission, substations, and more.**

VI. Performance Metrics and Monitoring

- **Safety performance metrics, including public safety metrics, are important in evaluating the effectiveness of mitigation plans.**
- **OSA also supports explicit inclusion of organizational metrics, including evaluation of backlog data and near misses.**

- **The proceeding should evaluate a wide range of metrics, including wires down, wires down that remain energized, and detailed emergency response times.**
- **Performance metrics and monitoring should include all electric infrastructure, including transmission, substations, and more.**

VII. Any other information that the CPUC may require.

- **OSA supports inclusion of safety culture assessments as explicit input to this proceeding.**
- **This proceeding should include any wildfire hazards that may not be not covered by GO 95 but are conditions that could lead to the ignition of a wildfire.**