

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

*Order Instituting Rulemaking to  
Implement Electric Utility Wildfire  
Mitigation Plans Pursuant to Senate Bill  
901 (2018)*

Rulemaking 18-10-007  
(Filed Oct. 25, 2018)

**MOTION FOR PARTY STATUS OF COUNTY OF SANTA CRUZ**

Carlos J. Palacios  
County Administrative Officer  
County of Santa Cruz  
701 Ocean St  
Santa Cruz, CA 95060  
Tel: 831-454-2100

December 15, 2018

E-mail: [cao@santacruzcounty.us](mailto:cao@santacruzcounty.us)

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**I. Introduction**

The County of Santa Cruz respectfully moves for party status in this proceeding in accordance with Section 1.4 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure.

**II. Interest in this Proceeding**

As a heavily forested county including numerous areas of high fire risk, Santa Cruz County writes to offer its perspective on rulemaking process R1810007, implementing wildfire management plans under SB901.

Santa Cruz County has been the site of numerous historic fires, and has always known the threat of wildfire. However, drought and increased human activity in wildland interface areas has raised the danger of catastrophic fires in recent years. Our rural residents are well aware of the hazards presented by wildfire, and wish to see responsible forest management practices that lower the risk of fire.

The County supports effective fire risk mitigation practices, especially those that harden electrical systems. However, after the Dec. 22, 2017 Public Utilities Commission decision

D1712024 ("Adopting Regulations to Enhance Fire Safety in the High Fire-Threat District"), investor-owned utility Pacific Gas & Electric initiated enhanced vegetation management protocols spelled out in the decision, including increasing clearances around powerlines in high fire threat districts from 4 feet to 12 feet. The difference amounts to a nine-fold increase in the vegetative materials to be removed.

We have yet to identify the documentation supporting this decision, which has made it impossible to explain this decision to concerned residents. The questions go beyond quality of life issues, as "topping" trees is harmful and can leave them vulnerable to infestations and disease, which can lead to tree mortality and actually increase fire danger. Furthermore, trees play an important role in carbon sequestration and mitigating the impact of climate change, which experts believe is the primary driver of the seemingly existential threat wildfires now pose to California.

Indeed, a review of regulatory clearances reveals a variety of standards. The phenomenon of flashover appears nonexistent in living trees (see, e.g. <https://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Report%20on%20Applicability%20of%20Gallet%20Equation%20in%20VegMgmt.pdf>) and PUC Decision D1712024 does not mention the Gallet equation often used to calculate such phenomena. Therefore, we can only assume the risk considered is one of vegetation damaging power lines by impact.

While these clearances appear to be a major focus of investor-owned utilities, they do not appear to be a leading cause of wildfire. In the Camp Fire, for example, published reports indicate investigators have removed pieces of equipment as part of their investigation, suggesting faulty or damaged equipment may be at least partly to blame. CAL FIRE has determined the 2017 Cascade Fire was caused by "line slap," a situation where two sagging lines come into contact with each other.

Investigators have determined vegetation to be at fault for some of the 2017 firestorm fires, but it is unclear whether increasing clearances would have prevented those blazes. In one case, a large tree toppled into lines – a situation that could easily replicate itself in Santa Cruz

County, where redwood trees can surpass 200 feet. Furthermore, sustained winds can carry vegetation across significant distances. And whether a limb falls from four feet or 12, gravity acts upon the branch just the same.

It is unclear to us whether the decision to increase vegetation clearances is science-informed, risk-based decision-making. Why 12 feet? Why not more? Why not less? We have yet to see the supporting documentation.

While increased vegetation clearances may be persuasive and helpful in liability determinations in a courtroom setting, we know little about the benefits and best practices for wildfire management – specifically, appropriate clearances around transmission lines. In 2017, for example, Southern California Edison examined more than 200 fires along their transmission system from 2015-2017. Just 17 percent occurred through contact from vegetation, but it is unclear to us how many of those, if any, might have been prevented with increased clearances. Absent supporting documentation and meaningful public outreach, pursuit of this remedy creates a charged environment that reduces support for enhanced wildfire management within high fire risk communities and redirects resources from actions that do have clear benefits for wildfire prevention.

Santa Cruz County would like to see IOUs invest in measures that will have proven preventative benefits: (1) updating equipment and replacing aging infrastructure, (2) hardening the system including expanding the use of covered conductors and even undergrounding lines where feasible, and (3) deploying technology such as remote cameras and remote-controlled automatic reclosers to mitigate fire risk and enhance fire response.

As Southern California Edison has already concluded, preventing contact with vegetation is difficult if not impossible. The safest course is to design a system that can *withstand* contact. (see Application No.: 18-09-00, Exhibit No.: SCE-01A)

The County supports appropriate vegetation management. Reducing fuel load around powerlines in high fire risk areas is an important step to mitigating fire risk in those areas. Our

concerns have to do with the limitations of that approach, and the extent to which it diverts resources from preventative measures which represent science-informed, risk-based steps toward a safer electrical distribution system. Any requirements for the implementation of wildfire mitigation plans should take this into account.

### **III. Notice**

Service of notices, orders, and other correspondence in this proceeding should be directed to Santa Cruz County at the address set forth below:

Jason Hoppin  
Santa Cruz County Administrative Office  
701 Ocean Street  
Tel: 831-454-2100  
E-mail: [jason.hoppin@santacruzcounty.us](mailto:jason.hoppin@santacruzcounty.us)

### **IV. Conclusion**

Santa Cruz County's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, Santa Cruz County respectfully requests that the CPUC grant this Motion for Party Status filing.

Dated: December 15, 2018

Respectfully submitted,

/s/ Carlos Palacios

Carlos J. Palacios  
County Administrative Officer  
County of Santa Cruz  
Tel: 831-454-2100  
E-mail: [cao@santacruzcounty.us](mailto:cao@santacruzcounty.us)