



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

June 28, 2023

Caroline Thomas Jacobs
Director, Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Electronically Filed to Docket # 2023-2025-WMPs

**RE: Comments of the Rural County Representatives of California on the SMJU
2023-2025 Wildfire Mitigation Plans**

Dear Director Thomas Jacobs:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to provide comments on the Small and Multi-Jurisdictional Utility (SMJU) 2023-2025 Wildfire Mitigation Plans (WMPs or Plans). RCRC is an association of forty rural California counties, and our Board of Directors is comprised of elected supervisors from each member county. Specifically, our comments primarily focus on, and are applicable to, Liberty Utilities¹ and PacifiCorp² given their presence in our member counties.

Safeguarding California's residents from future harm resulting from a utility-caused wildfire event is one of RCRC's primary public policy goals. California has some of the highest electricity cost burdens in the nation and, given there are fewer customers of the SMJUs, wildfire mitigation activities must be holistically feasible and provide thoughtful risk-spend efficiency given their limited ratepayer base.

Like the large investor-owned utilities (IOUs), SMJUs are expanding the use of fast trip settings as an ignition reduction mitigation. As an initial matter, RCRC does not oppose the reasonable use of fast-trip settings to reduce the risk of igniting wildfires. However, RCRC has expressed concerns to both the California Public Utilities Commission (CPUC) and Energy Safety with the execution of these programs by the large IOUs. That said, if these fast trip programs are competently designed, programmed, and implemented they could prove to be a very cost-effective solution for these customers. PacifiCorp's "Elevated Fire Risk" (EFR) Modes appear to balance the public

¹ 20230519_Liberty_2023_WMP_R1, referred to hereafter as Liberty 2023-2025 WMP

² 20230508_PC_2023_WMP_R0, referred to hereafter as PacifiCorp 2023-2025 WMP

safety tradeoffs of ignition potential with maintaining energy reliability through reclosers that result in short-duration outages. On the other hand, Liberty's "Sensitive Relay Profile" (SRP) program is more emergent and largely in the pilot phase.

As a general matter, RCRC requests more uniform regulatory parameters, oversight, and scoping of fast trip programs, including reporting outages and mitigating reliability impacts.³ SMJUs must follow suit with more granular details of outages that may occur. Often, SMJU service territories contain rural and remote customers who may not have robust telecommunication options and service quality. This can exacerbate emergency conditions in the event of frequent and/or prolonged power outages.

Thank you for the opportunity to comment on the SMJU 2023-2025 Wildfire Mitigation Plans. If you have any questions, please do not hesitate to contact me at lkammerich@rcrcnet.org.

Sincerely,



LEIGH KAMMERICH
Policy Advocate

³ Please see the July 12, 2022 [motion](#) by Pioneer Community Energy, Sonoma Clean Power Authority, East Bay Community Energy, Marin Clean Energy and RCRC ("Joint Parties") to CPUC Proceeding R.18-12-005.