



COUNTY EXECUTIVE OFFICE

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Marion Peleo, Staff Counsel
Legal Division
California Public Utilities Commission
505 Van Ness Avenue
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Submitted via email: Marion.Peleo@cpuc.ca.gov and
ResolutionCommentsSCE@cpuc.ca.gov

RE: Comments of the County of Santa Barbara regarding Draft Resolution SED-5 approving an Administrative Consent Order and Agreement (ACO) of the Safety and Enforcement Division (SED) and Southern California Edison Company (SCE) regarding the 2017/2018 Southern California Fires

Staff Counsel Marion Peleo,

The County of Santa Barbara appreciates the opportunity to comment on Draft Resolution SED-5 and the ACO regarding the 2017 Thomas Fire and other 2017/2018 Southern California Fires. As you know, the 2017 Thomas Fire was the largest wildfire in California history at the time. It destroyed 1,063 structures, burned 281,893 acres, and caused two deaths in Santa Barbara and Ventura Counties.¹ The Thomas Fire then caused debris flows in January 2018 that resulted in catastrophic damage in Montecito Creek and San Ysidro Creek, 23 additional deaths including two missing persons, 129 destroyed residences, and 307 damaged residences.

In March 2019, investigators determined that Southern California Edison's equipment sparked both ignitions that became the Thomas Fire. SCE power lines came into contact with each other (called a "line slap"), creating an electrical arc that deposited hot, burning or molten material into a receptive fuel bed.

The County supports the inclusion of substantial safety measures in the ACO, to reduce the likelihood of a similar catastrophe and loss of life in the future. The County recommends that the Commission and staff make the following revisions to the ACO, to strengthen the safety measures and make them more meaningful and impactful to the communities that were devastated by wildfire.

Appendix B: Safety Measures

- The ACO should require SCE to prioritize the required Safety Measures in the cities and counties impacted by the 2017/2018 Fires, rather than anywhere within their service area. Pages 5 and B-1 of the ACO should be revised to require that "All required Safety Measures should

¹ See [top20_acres.pdf \(ca.gov\)](#) and [top20_destruction.pdf \(ca.gov\)](#).

be prioritized to occur within those areas, cities and counties impacted by the 2017/2018 Fires identified within this ACO.”

- All of the required Safety Measures and other work required by ACO must be additive, and on top of work that the CPUC has separately required. Many of the requirements appear duplicative of work SCE is already required to do as part of its Wildfire Mitigation Planning and other CPUC requirements and rulings.
- Category A, Section i of the Safety Measures, System Enhancements, should be modified to include Pole Hardening or Undergrounding as an acceptable safety measure.

Category A, Section ii: Community Engagement and Protection

- The ACO should be modified to require that “All required Community Engagement and Protection should be prioritized to occur within those areas, cities and counties impacted by the 2017/2018 Fires identified within this ACO.”
- The ACO should be modified to require that all Community Engagement and Protection be coordinated with the emergency management and fire response agencies within the areas, cities and counties impacted by the 2017/2018 Fires. Local governments regularly work on outreach to community members and supporting their disaster resiliency. Any efforts by SCE should complement and enhance local government efforts to become a force multiplier of current outreach.
- Community Engagement and Protection efforts should not include CPUC-required meetings with local government. Such meetings tend to have too many participants and tend to be scripted, both of which eliminates their effectiveness as a coordination tool.
- The ACO should be modified to include the following effective alternative Community Engagement and Protection recommendations:
 - Coordinate multi-cultural and inclusive educational outreach campaigns in coordination with trusted local government entities.
 - Support outreach and educational campaigns at local events and through known cultural brokers for those communities, such as the Santa Barbara County Promotores Network.
 - Support local government preparedness educational efforts, including printed materials, website design and content, and social and news media campaigns.
 - Support community-based preparedness concepts, such as the Community Emergency Response Team (CERT) program and Community Leaders Train the Trainer programs.
- The ACO should be adjusted to require that the identification and development of community outreach be led by individuals within SCE who understand disaster preparedness, such as the emergency managers in SCE’s resilience group.
- The ACO should be revised to include additional Community Protection measures beyond contributing additional fire suppression resources, including:

- Work with Local Government Emergency Management, law enforcement and fire agencies to enhance Alert & Warning systems within high fire risk zones, including concepts such as community-based siren systems, public alerting equipment and response based situational awareness dashboards for community information.
- Support local government Public Works/Road Commissions and Planning & Development Departments in their efforts to enhance evacuation planning, route capacities and safety of roads within high impact fire zones.

Category D: Financial Contributions to Safety- and Wildfire Mitigation-Focused Non-Profit Organizations

- The ACO should be modified to require that, “All required Financial Contributions to Safety and Wildfire Mitigation focused Non-Profit Organizations should be prioritized to occur within those areas, cities and counties impacted by the 2017/2018 Fires identified within this order.”
- The ACO should be modified to require SCE to coordinate these efforts with the emergency management and fire response agencies within the areas, cities and counties impacted by the 2017/2018 Fires. Non-profit organizations involved in community fire resiliency varies jurisdiction to jurisdiction. Local government agencies are the best way to reach the organizations that are already effectively working within the impacted communities. At a minimum, SCE’s application and outreach process should be shared with local governments, so they can share it with known effective local organizations.
- The ACO should be modified to note that this funding also can be used in support of non-profit organizations that provide life-saving preparedness, response and recovery support, and not just those focused on “environment, ecosystems and natural resources.”
 - For example, the Independent Living Resource Center (ILRC) protects life safety by providing emergency supplies to those with Access and Functional Needs, and supporting the emergency preparedness efforts of those community members.
 - Similarly, Direct Relief is an excellent partner that addresses life safety issues, and should be eligible for funding.

Transparency

Santa Barbara County received the Draft Resolution without any prior notice or opportunity to comment. This is regrettable, since the County understands that the CPUC went through a transparent public process in past enforcement matters, including those involving the Pacific Gas & Electric Company (PG&E). The County understood that this level of public participation would continue under Resolution M-4846 and the Commission’s new Enforcement Policy, especially since that document specifically identifies transparency as a “Guiding Principle” for the Commission and its enforcement staff. Impacted communities and local governments deserve a chance to participate, and the Commission would be well-served to allow them to comment earlier on potential fines, the nature and extent of corrective measures, and disallowances.

The County of Santa Barbara appreciates the opportunity to comment and the Commission’s attention to these very important issues. The County believes the revisions identified above will result in an

improved ACO that enjoys greater community and local government support, and an increased likelihood of addressing the catastrophic consequences of the 2017/2018 Fires and the very real risk of similar disasters in the future.

Please contact me with any questions or to discuss these comments further at KHubbard@CountyofSB.org or (805) 681-5526.

Sincerely,



Kelly Hubbard
Director, Office of Emergency Management
County of Santa Barbara

CC. County of Santa Barbara:
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California Public Utilities Commission:
Service List for R.18-10-007 and R.21-10-001