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**November 5, 2018**

California Public Utilities Commission  
Public Advisor's Office  
505 Van Ness Avenue  
San Francisco, CA 94102

**SUBJECT: FORMAL COMMENTS TO CPUC PROCEEDING R. 18-10-007 TO GUIDE AND REVIEW ELECTRIC UTILITIES' WILDFIRE MITIGATION PLAN**

Dear California Public Utilities Commission President and Commissioners:

On behalf of the City of Rancho Palos Verdes, I am submitting formal comments in the California Public Utilities Commission's (CPUC) proceedings to guide and review investor-owned electric utilities' wildfire mitigation plans. Despite being in the midst of the greater Los Angeles urban area, the City of Rancho Palos Verdes is home to a 1,400-acre wildland preserve with chaparral and similar conditions to those seen in other major fires throughout California. In the past few years alone, the City has experienced multiple fires directly resulting from Southern California Edison's equipment and contractors near the Preserve, placing the City, its residents, and the entire South Bay region at risk. As a result, the City opines that it is imperative the CPUC approve the initial set of electric utility wildfire mitigation plans before the 2019 fire season. The City of Rancho Palos Verdes recognizes that such plans are crucial given that California has been facing increasingly extreme weather patterns, with wildfire season beginning sooner and ending later than in years past.

The wildfire mitigation plans describe the utilities' plans to prevent, combat, and respond to wildfires affecting their service territories. The City is specifically in strong support of the following items being included in the plans:

- Protocols for power shutoff that will not affect public safety or those who rely on life-support machines
- Aggressive preventative measures including brush clearing, undergrounding utilities and allocating additional Rule 20A funds to carry out this work
- Creating and upholding standards for equipment replacement, especially in high risk areas
- Regular maintenance and inspection of lines
- Immediate restoration of service after a wildfire

The City believes creation of these plans are a step in the right direction and that enforcement by the CPUC is equally important to help ensure the safety of all Californians. While investor-owned electrical utilities should take financial responsibility for damage caused by utility wildfires, it is the City's hope that stronger mitigation plans can prevent future fires.

Sincerely,

A handwritten signature in blue ink, appearing to read "Willmore", with a long horizontal flourish extending to the right.

Doug Willmore  
City Manager

CC: Rancho Palos Verdes City Council