Guiding questions for September 17-19 workshop discussions

Example questions: Day 1 – IOU updates

    Big picture questions

I.   What is IOU progress on WMPs?
        What is working / what isn't?
        What should change & how?

II.   What is SMJU progress on WMPs?
        What is working / what isn't?
        What should change & how?

III.   What is the impact of 1054?
        What will the CPUC's efforts entail?
        How will CPUC SED engage stakeholders?

Example questions: Day 2 Part 1 – Wildfire ignition and risk metrics

    Big picture questions

I.   Which S-MAP metrics are relevant for WMPs? How should they be incorporated?

II.   What best practices from risk management in other industries apply to wildfire mitigation?
        How should they be incorporated?

III.   What metrics should be tracked for WMP evaluation & how can they be standardized?

    Detailed questions

1.   What data can be collected, calculated, or analyzed to determine whether WMP programs are effective at reducing the risk of catastrophic wildfire ignition from utility assets? Is this existing data or will it require new data collection and reporting requirements? To what extent can this data be standardized across utilities?

2. Should utilities be required to track the amount and duration that transmission and distribution assets are loaded beyond their manufacturer rated capacities to determine the impacts on their mechanical properties (i.e. strength, resistance, etc.) and service life? Should utilities report differently for utility assets at higher risk of presenting an ignition source (e.g., conductors, transformers, etc.)? Should utilities report how they then schedule preventative maintenance for those assets to account for overloading impacts on strength properties and service life?

3. How should utilities report on the time between detection of an ignition and response for maintenance or fire response for their assets? What should utilities track and report for notification source, time, and channel received; which type of responder (e.g. maintenance crew, fire fighters, helicopter, etc.) dispatched; and response time between notification and arrival onsite; other data?

4. How could utilities best report metrics outlining their ability to detect wildfires (e.g., a dedicated section in the WMP)? What types of metrics would be the most helpful, e.g., should utilities report the percent of their assets that wildfire detection cameras are covering and how quickly these can detect ignition?

5. What information and data should be provided around how long it takes to repair assets and restore power? After a fire versus under normal operating conditions?

6. What information and data should be provided around how often equipment fails? Should this information be delineated by equipment type or vintage? What information and data should be provided on how long it takes to implement a particular mitigation activity?

7. What data should be collected to show measures of utility risk, including the uncertainties around these metrics? How should utility ignition risk be measured? For example, should utilities disclose metrics based on number of ignitions, projected ignitions, or near misses (i.e. potential ignitions) to show trends in risk reduction over time or in an absolute sense? Is there supplemental data or other information that would useful for utilities to track and report?

8. How should utilities report the actions they are taking, if applicable, after each ignition event that occurs on their infrastructure? How should utilities share best practices with one another and the public in a timely fashion?

Example questions: Day 2 Part 2 – Data collection and reporting requirements

Big picture questions

IV. What data points should be collected for WMP evaluation?
   - For example: ignition, near-ignition, & wire down events; characteristics of associated assets; standardized weather measurements?
   How should utility data (including HFTD maps) be compiled to enable third party access and analysis?
   How should data be audited for quality?

Detailed questions

1. What process should be implemented to validate the ignition data reported by utilities pursuant to D.14-02-015? How should unreported ignitions from previous years be handled? How should the Commission address the issue of utility reporting of ignitions that may be under investigation for cause at the time of reporting?

    What information should be added to the required data collected and reported pursuant to D.14-02-015? For example, should ignition data include wind speed and wind gust readings from nearest weather station, FPI ratings, whether a RFW was in effect, date/time RFW was issued, fire AHJ, HFTD tier, etc.?

    Should SMJU's be required to collect and report information on utility ignition data similar to large IOUs, in accordance with D.14-02-015?

2. Beyond ignition data, what else could be collected for near-misses, outages, wire-downs, re-closing events, or other events that did not lead to a wildfire ignition but could have?

4. What data could be collected on risk factors to wildfire spread, such as: i) changes in use of land, including increase in population density in or at the edge of forested lands; ii) terrain around assets in high fire risk areas; iii) accessibility of assets for initial fire detection; and iv) proximity of fire suppression resources, e.g. ingress time for first responders to assets in high fire risk areas?

5. What data should be collected around vegetation growth/presence within prescribed clearances? Should utilities report vegetation that poses a risk even if they are outside of prescribed clearances (such as tall trees that could fall sideways onto the line)? Should utilities be required to provide maps of proposed vegetation clearance projects? What elements of these vegetation clearance projects should be reported (i.e. area covered, nature of work – removal, trimming, surface vegetation modification, etc., before/after photos, performance metric (if applicable) – e.g. feet of clearance obtained)?

6. What mechanism could utilities use to report live and historical localized weather around T&D assets? For example, should utilities report live weather data in the locations of their assets in a standardized format? What are utilities currently doing in this regard?

7. What information, data, or reporting should be provided about fuel levels (combustible vegetation and other material): i) near utility assets; ii) more broadly in California forests and other regions susceptible to wildfire? For example, should prevalence of dry fuel, vegetation group and species, and location in areas near utility assets be collected and reported? Who should do this?

8. What information should utilities be required to report on ingress and egress routes to assets in High Fire Threat District areas (including on areas where T&D assets are located near to a primary road for ingress or egress)? Should utilities be required to incorporate ingress and egress risk factors into overall wildfire risk planning, and if so, how?

Example questions: Day 3 – Process, compliance, and other topics

I.   Submission and evaluation process

Big picture   How should the WMP submission & evaluation process be updated?
- Extend timeline for WMP analysis, feedback, & updates?
- Incorporate cost/risk-benefit analysis of PSPS vs system hardening vs vegetation management?
- Adjust data request response & discovery requirements?

Detailed questions

1.   Should data around maintenance work plans and dates of recent equipment inspection be collected for utilities? Should this data collection be focused on areas of highest wildfire risk?

2.   What customer or other 3rd party (such as local governments) safety complaints or notifications should utilities collect, share, and prioritize? For example, should utilities disclose anonymized public complaints in a standardized format, as well as their response?

3.   How can the CPUC best evaluate the work utilities have completed according to their WMPs—could the review process be extended, require evidentiary hearings and expert witnesses, include a scheduled revision phase, provide different opportunities for public input, other? What should the CPUC do when utilities achieve their targets or fall short of them?

II.   Third-party evaluators and compliance

Big picture   How should third-party evaluation & compliance be run / defined? What does WMP compliance mean?
- Should CPUC or PAO oversee? Delineate vs WSD?
- Evaluate current WMP compliance and/or gaps in WMP itself?

Detailed questions

1.   What could be used as a quality assurance check to ensure the data reported is accurate?

2.   What specific financial incentives should be considered for utilities' WMP performance? For example, should penalties or incentives be applied and, if so, how should they be designed? What, if any, would be the disadvantages of providing financial incentives to drive down utility wildfire ignition risk?

3.   What type of market indicators or other data would help assess the changing risk of the utility landscape?

4.   Should independent evaluators only evaluate the most recent WMP and assess the work completed, or should it identify gaps in the plans and recommend modifications to improve plan effectiveness? Should they use utilities' past performance as the baseline, or other?

5.   How should the CPUC respond to PG&E's second amendment?
- Mid-term review?
- Audit vegetation management for unwarranted tree removal?

Should the CPUC incorporate findings from the independent monitor report?