UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Wildfire Risk Mitigation Technical Conference	Docket No. AD25-16-000

PREPARED WRITTEN STATEMENT OF RANDY S. HOWARD, GENERAL MANAGER OF THE NORTHERN CALIFORNIA POWER AGENCY

Thank you for the invitation to participate in this technical conference on best practices for reducing the risk of wildfire ignition from the bulk power system. Wildfires are growing in intensity and frequency across the United States, destroying forests, grasslands, and communities. Public power utilities across the country, particularly in the West, have been impacted by the devastation caused by wildfires, and more will likely be impacted as wildfires occur in areas historically deemed low risk by the Federal Emergency Management Agency.

Significant federal action is needed to enable utilities to mitigate against wildfire risks and to more effectively respond and recover following wildfire ignitions. While much of that action is the responsibility federal agencies other than the Federal Energy Regulatory Commission (FERC or Commission), this Commission can play an important role in ensuring that other agencies prioritize utility wildfire mitigation efforts, electric reliability, and power restoration.

I. INTRODUCTION

My name is Randy S. Howard, and I am the General Manager of the Northern California Power Agency. NCPA is a nonprofit California joint powers agency established in 1968 to construct and operate electric generating facilities and deliver the wholesale energy needs of its 16 member utilities: the Cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, Shasta Lake, and Ukiah, Plumas-Sierra Rural Electric Cooperative, Port of Oakland, San Francisco Bay Area Rapid Transit (BART), and Truckee Donner Public Utility District—collectively serving nearly 700,000 electric consumers in Central and Northern California.

I am also representing today the American Public Power Association (APPA), the voice of not-for-profit, community-owned utilities that power 2,000 towns and cities nationwide. They collectively serve over 55 million people in 49 states and five U.S. territories, and account for 15 percent of all sales of electric energy (kilowatt-hours) to end-use consumers. Public power utilities are load-serving entities, with the primary goal of providing the communities they serve with safe, reliable electric service at the lowest reasonable cost, consistent with good environmental stewardship.

Throughout my tenure as General Manager of NCPA and former head of the Power System for the Los Angeles Department of Water and Power, I have been extensively involved in both the policy and operational aspects of wildfire mitigation and wildfire emergency response and recovery. That knowledge base is supported through my work as the Co-Chair of the Electricity Subsector Coordinating Council (ESSC) Wildfire Working Group, as well as active participation in FERC transmission policy development as a member of APPA, the Transmission Access Policy Study (TAPS) Group, Life Member of Institute of Electric and Electronic Engineers (IEEE), and Board Member of the Transmission Association of Northern California (TANC).

II. AGENCY COORDINATION

The Commission has asked several questions about strategies that state and federal regulators have adopted to mitigate wildfire threats and about how utilities and myriad regulators can better coordinate to prevent wildfire ignition.

Today, electric utilities encounter numerous federal hurdles and delays when undertaking wildfire mitigation, grid hardening, and wildfire recovery actions to protect their systems and the communities they serve. For example, for electric infrastructure on federal lands, federal agencies continue to delay approval for electric utilities to conduct routine vegetation management and hazard tree removal operations. Federal agencies also delay approvals for creating or improving right-of-way access roads that utilities need to bring equipment for vegetation management, preventive inspections, or hardening of infrastructure. Agency approval to remove even a single hazard tree in advance of fire season can take months or even years.

Those delays increase the risk of wildfires, increase the degree of potential devastation, and drive up the cost of conducting wildfire mitigation activities. The increased costs and risks are impacting the financial stability of electric utilities, even when passed on to consumers. Addressing the delays and complexities of obtaining federal approvals would improve reliability, safety, and affordability. Several federal actions should be considered:

- Amending the National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) to categorically exclude routine and emergency vegetation management, right-of-way access road, post-fire recovery efforts, and grid hardening projects from NEPA and NHPA reviews in existing rights-of-way.

- Requiring land-management agencies to further clarify emergency hazard tree removal approval processes and have those policies consistent across regions and agencies.
- Amending existing expedited authorities under the Federal Land Policy and Management Act of 1976 (FLPMA) with respect to rights-of-ways to allow the clearing of hazard trees within 150 feet of an electric power line instead of the current limit of 10 feet.
- Amending the FLPMA to allow for the automatic approval of vegetation management plans submitted by electric utilities after approximately four months without amendment and creating a process for modified plans that are not reviewed with 120 days of submission.
- Amending regulations under the FLPMA that currently do not allow utilities to then remove the felled timber, slash, and other vegetation from the forest itself without undergoing a timber sale or donation process, which is both expensive and time-consuming. This results in stacks or scatters of dried timber and vegetation on the forest floor, greatly increasing fuel load and future risk of wildfire, contrary to the goals of vegetation management. Utilities are supporting legislation to amend this requirement.
- Amending the FLPMA to promote additional consultations with private landholders about hazard trees on their land.

- Requiring land-management agencies to expedite implementation of master service agreements (combining multiple permits and updating expired (almost 25%) right-of-way permits) with utilities that hold multiple operating and maintenance electric corridor permits.

Most of those recommendations are outside this Commission's jurisdiction, but the Commission and the North American Electric Reliability Corporation (NERC) should engage in outreach and education with other federal agencies to ensure that wildfire mitigation, electric reliability, and affordability remain front-of-mind for those agencies.

III. GRID OPERATIONS

The Commission has also asked several questions about grid operations in advance of and following wildfire ignitions, including about Public Safety Power Shutoff (PSPS) procedures. The experience to date has shown that fewer PSPS events are necessary on the bulk power system due to greater line clearances, width of rights-of-ways, and more resilient equipment and materials. Bulk-power-system PSPS events tend to be triggered because of nearby wildfire smoke and ash, as well as for protection of firefighting aircraft.

Working with federal agencies, the utility co-chairs of the Wildfire Working Group developed a map (Attachment A) of the key western states' bulk transmission lines and their physical relationship to both BLM and USFS federal lands. As shown, these transmission lines traverse many federal lands. Mitigating wildfires approaching or burning near these lines is critical to the bulk grid reliability and resiliency.

The widespread use of PSPS or fast-trip programs may be inevitable in service territories or with lower voltage transmission until some of the preferred solutions discussed above can be implemented. While deenergizing lines—and often shedding load as a result—may be necessary in some instances to reduce the risk of wildfire ignition, the impact to customers and to grid stability is significant. As more utilities begin adopting PSPS or similar procedures, there is a growing need to ensure that the procedures are coordinated on a wide-area basis to avoid grid instability or cascading outages

Following a wildfire ignition, it is essential that utilities can effectively coordinate with state and federal agencies to restore power, conduct needed hazard tree removal, and communicate with affected communities. To that end, federal agencies should adopt mechanisms for joint disaster command communication and community messaging. Furthermore, land-management agencies should adopt policies that clearly state that power restoration is a priority after wildfire ignition.

IV. GRID DESIGN AND HARDENING

The Commission's final set of questions for this panel address transmission system planning, reliability standards, and grid hardening practices.

California has been a leader in developing transmission planning practices that consider wildfire risks as well as investing in grid hardening. The California Independent System Operator Corporation (CAISO) revised its transmission planning process in 2020 to identify long-term solutions (to complement operational solutions) to mitigate both the risk of wildfire ignition and to improve electric reliability during wildfire events.

California utilities have also made substantial investments in grid hardening solutions, including undergrounding lines, covering conductors, replacing wood poles with steel or composite materials, and deploying enhanced sensor technologies and relays to reduce the risk of ignition.

The existing NERC transmission planning standards do not explicitly address wildfire risks, but they do generally require transmission planners to consider a wide range of probable contingencies, which can include contingencies related to wildfires. Moreover, NERC is currently developing revisions to the transmission planning standards to address extreme natural events, such as wildfires.

V. CONCLUSION

I applaud the Commission for establishing this technical conference, and I look forward to addressing the Commission's questions. All stakeholders have an opportunity—if not an obligation—to act urgently and take accountability to address the wildfire crisis.