



**CITY OF SOUTH PASADENA
PUBLIC SAFETY COMMISSION REGULAR MEETING AGENDA**

**CITY COUNCIL CHAMBERS
1424 MISSION STREET, SOUTH PASADENA, CA 91030
IN-PERSON**

Monday, April 10, 2023 at 8:30 a.m.

South Pasadena Public Safety Commission Statement of Civility

As your appointed governing board, we will treat each other, members of the public, and city employees with patience, civility and courtesy as a model of the same behavior we wish to reflect in South Pasadena for the conduct of all city business and community participation. The decisions made today will be for the benefit of the South Pasadena community and not for personal gain.

NOTICE ON PUBLIC PARTICIPATION & ACCESSIBILITY

The South Pasadena Public Safety Commission Meeting will be conducted in-person from the Council Chambers, Amedee O. "Dick" Richards, Jr., located at 1424 Mission Street, South Pasadena.

The Public Safety Commission Meeting for **April 10, 2023** will be broadcasted via zoom teleconference and will take place in-person.

To maximize public safety, members of the public may attend and/or participate by the following means:

The Meeting will be available:

- In-person: 1424 Mission Street, South Pasadena, CA 91030
- Via Zoom – **Meeting ID: 841 9322 6718**
- Zoom Link – <https://us06web.zoom.us/j/84193226718>

To maximize public safety while still maintaining transparency and public access, members of the public can observe the meeting via Zoom in one of the methods below:

1. Go to the Zoom website, <https://zoom.us/join> and enter the Zoom Meeting information; or
2. Click on the following unique Zoom Meeting link: <https://us06web.zoom.us/j/84193226718>
3. You may listen to the meeting by calling: +1-669-900-6833 and entering the Zoom Meeting ID

For additional Zoom assistance with telephone audio, you may find your local number at:

<https://zoom.us/u/aiXV0TAW2>

CALL TO ORDER

ROLL CALL

Commissioners Tricia Desmarais, Armando Munoz, Walter Cervantes, Bethesda Gee, Amin Alsarraf, Vice Chair Lisa Watson, Chair Ed Donnelly

COUNCIL LIAISON:

Councilmember Michael Cacciotti

PUBLIC COMMENT AND SUGGESTIONS

The City Council welcomes public input. If you would like to comment on an agenda item, members of the public may participate **by means of one of the following options:**

Option 1:

Participants will be able to “raise their hand” using the Zoom icon during the meeting, and they will have their microphone un-muted during comment portions of the agenda to speak for up to 3 minutes per item.

Option 2:

Email public comment(s) to pscpubliccomment@southpasadenaca.gov.

Public Comments received in writing will not be read aloud at the meeting, but will be part of the meeting record. There is no word limit on emailed Public Comment(s). Please make sure to indicate:

- 1) Agenda item you are submitting public comment on.
- 2) Submit by no later than 6:00pm April 9, 2023.

NOTE: Pursuant to State law, the Commission may not discuss or take action on issues not on the meeting agenda, except that members of the Commission or staff may briefly respond to statements made or questions posed by persons exercising public testimony rights (Government Code Section 54954.2). Staff may be asked to follow up on such items.

1. Public Comment

ACTION/DISCUSSION

2. Minutes of the Public Safety Commission Regular Meeting of March 13, 2023

Consideration of the minutes of the Public Safety Commission Regular Meeting of March 13, 2023.

3. Arson Canine Vehicle

Discussion on authorization of a proposed agreement with Los Angeles Fire Foundation to obtain an Arson Canine Vehicle (ACV).

INFORMATION REPORTS

4. Community Emergency Response Team and Map Your Neighborhood

Informational report on the City of South Pasadena’s Community Emergency Response Team and Map Your Neighborhood.

COMMUNICATIONS

5. City Council Liaison Communications

6. Staff Liaison Communications

8. Commissioner Communications

ADJOURNMENT

PUBLIC ACCESS TO AGENDA DOCUMENTS

The complete agenda packet may be viewed on the City's website, www.southpasadenaca.gov.

Meeting recordings will be available for public viewing after the meeting. Recordings will be uploaded to the City's YouTube Channel no later than the next business day after the meeting. The City's YouTube Channel may be accessed at: https://www.youtube.com/channel/UCnR169ohzi1AlewD_6sfwDA/featured


ACCOMMODATIONS

The City of South Pasadena wishes to make all of its public meetings accessible to the public. If special assistance is needed to participate in this meeting, please contact the City Clerk's Division via e-mail at CityClerk@southpasadenaca.gov or by calling (626) 403-7230. Upon request, this agenda will be made available in appropriate alternative formats to persons with disabilities. Notification at least 48 hours prior to the meeting will assist staff in assuring that reasonable arrangements can be made to provide accessibility to the meeting (28 CFR 35.102-35.104 ADA Title II).

I declare under penalty of perjury that I posted this notice of agenda on the bulletin board in the courtyard of City Hall at 1414 Mission Street, South Pasadena, CA, and the City's website at www.southpasadenaca.gov on April 6, 2023 as required by law.

April 6, 2023

Date



Brian Solinsky, Chief of Police



CITY OF SOUTH PASADENA
VIA HYBRID / IN-PERSON
CITY COUNCIL CHAMBERS
1424 MISSION STREET, SOUTH PASADENA, CA 91030

PUBLIC SAFETY COMMISSION REGULAR MEETING MINUTES

Monday, March 13, 2023 at 8:30 a.m.

CALL TO ORDER

Date/Time: March 13, 2023 / 8:37 a.m.

ROLL CALL

Commissioners Present: Commissioners Desmarais, Munoz, Cervantes, Gee, Alsarraf, Vice Chair Watson, Chair Donnelly

Commissioners Absent: None

Officials Present: Police Chief Brian Solinsky, Fire Chief Paul Riddle, Councilmember Michael Cacciotti, Management Analyst Alison Wehrle and Police Clerk Nelly Ochoa

Officials Absent: None

PUBLIC COMMENTS AND SUGGESTIONS

1. **Public Comment:** None

ACTION/DISCUSSION

2. **Minutes of the Public Safety Commission Regular Meeting of February 13, 2023**

Motion: MOTION BY VICE CHAIR WATSON, AND SECOND BY COMMISSIONER CERVANTES, CARRIED 6-0, to approve the Minutes of the February 13, 2023 Public Safety Commission Regular Meeting as presented.

Ayes: Commissioners Desmarais, Munoz, Cervantes, Alsarraf, Vice Chair Watson, Chair Donnelly

Noes: None

Abstain: Commissioner Gee

Commissioner Gee left the dais at 8:46 a.m.

3. **Award of Contract to Republic EVS in the Amount of \$282,608 for the Purchase of a 2024 Ford E-450 Medix Rescue Ambulance**

Fire Chief Paul Riddle provided a presentation on options for Fire Department rescue

ambulances. The "Type 3" rescue ambulance would be the best fit for the City's needs, as the 2009 vehicle currently in use is approaching the end of its useful life.

Due to technical difficulties, the meeting was recessed at 9:10 a.m. and reconvened at 9:17 a.m.

Motion: MOTION BY COMMISSIONER CERVANTES, AND SECOND BY COMMISSIONER ALSARRAF, CARRIED 6-0, to recommend that the City Council award the contract to Republic EVS for a rescue ambulance in the amount of \$282,608.

Ayes: Commissioners Desmarais, Munoz, Cervantes, Alsarraf, Vice Chair Watson, Chair Donnelly

Noes: None

Absent: Commissioner Gee

INFORMATION REPORTS

4. Updates from the City Manager's Office

Deputy City Manager Domenica Megerdichian presented an update on offerings from the City including a business guide and a social services guide that connect the community to resources. A status update of the progress of the City's strategic plan, Department assessments, the housing element, and the upcoming Commissioner Congress event were also provided.

5. Informational Traffic Safety Update for the 2000 Block of Huntington Drive

Management Analyst Alison Wehrle gave an informational update on traffic safety for the 2000 Block of Huntington Drive. The Police Department has been focused on both education and enforcement along Huntington Drive including increased police presence, the use of the radar trailer, and posting of educational signage. Staff recommended that the Commission review, discuss, and approve the forwarding of the item to the Mobility and Transportation Infrastructure Commission for further analysis.

Speakers: Erin Fleming, David Keily

Motion: MOTION BY COMMISSIONER CERVANTES, AND SECOND BY COMMISSIONER ALSARRAF, CARRIED 6-0, to approve the forwarding of the review of the area surrounding the 2000 block of Huntington Drive to the Mobility and Transportation Infrastructure Commission for consideration.

Ayes: Commissioners Desmarais, Munoz, Cervantes, Alsarraf, Vice Chair Watson, Chair Donnelly

Noes: None

Absent: Commissioner Gee

COMMUNICATIONS

6. City Council Liaison Communications

Councilmember Michael Cacciotti shared his discussions of the electrification program with other local cities and mentioned that many other cities are experiencing heavy catalytic converters thefts throughout the region.

7. Staff Liaison Communications

Fire Chief Paul Riddle provided an update on recruitment for the two open Firefighter/Paramedic positions. Chief of Police Brian Solinsky updated the Commission on the recruiting efforts for the Police department and announced an upcoming catalytic converter etching event.

8. Commissioner Communications

None

ADJOURNMENT

Date/Time: March 13, 2023 / 10:03 a.m.

Respectfully Submitted:

Approved By:

Nelly Ochoa
Recording Secretary

Ed Donnelly
Chair



Public Safety Commission Agenda Report

ITEM NO. 3

DATE: April 10, 2023
FROM: Paul Riddle, Fire Chief
SUBJECT: **Arson Canine Vehicle**

Recommendation

It is recommended that the Public Safety Commission review and recommend to the City Council an agreement with the Los Angeles Fire Foundation (“LACFF” or “Foundation”) authorizing the Foundation to serve as a fiscal sponsor on behalf of the South Pasadena Fire Department (SPFD) to receive an Arson Canine Vehicle (ACV).

Discussion/Analysis

The LACFF is tax exempt under Section 501(c)(3) of the Internal Revenue Code. The Foundation’s purpose is to provide financial support, tools and equipment, high quality training, education and operational support to local fire agencies at no cost.

The Foundation serves as a fiscal sponsor for agencies throughout Los Angeles County to receive grants, tax deductible contributions and other revenues on the Foundation’s behalf for use in carrying out certain charitable activities and programs.

SPFD can benefit from receiving support via the LACFF. The foundation has identified available funds for an ACV and other designated equipment to enhance SPFD’s Arson/K9 Program. Details on the make/model of the ACV are not available at this time. The proposed agreement authorizes the Foundation to serve as the fiscal sponsor for SPFD. Additional details on the ACV will be forth coming.

SPFD will be requesting additional items in the future such as a mechanical Cardiopulmonary Resuscitation (CPR) machine to enhance our EMS service to the community.

Background

LACFF supports diversity enhancement programs by donating to community-based programs such as the Stentorians, Women’s Fire League, Asia Pacifica Islanders Firefighters, Bomberos and Junior Lifeguards. The Foundation has also donated equipment to Police and Fire Departments throughout Los Angeles County. Donated equipment include mechanical CPR machines and equipment, extrication tools, Pick-up trucks, and high-quality canine and handler training.

Arson Canine Vehicle

April 10, 2023

Page 2 of 2

Fiscal Impact

The agreement will have no fiscal impact on the SPFD's Budget. SPFD will notify LA County Fire Foundation of its needs and those items will be purchased directly by the Foundation for use by the Department.

Public Notification of Agenda Item

The public was made aware that this item was to be considered by virtue of its inclusion on the legally publicly noticed agenda, posting of the same agenda and reports on the City's website.



Public Safety Commission Agenda Report

ITEM NO. 4

DATE: April 10, 2023
FROM: Paul Riddle, Fire Department
SUBJECT: **Community Emergency Response Team and Map Your
Neighborhood**

Discussion of the City of South Pasadena's Community Emergency Response Team and Map Your Neighborhood.

**ADDITIONAL NON-AGENDA
PUBLIC COMMENT RECEIVED**

From: [Alan Ehrlich](#)
To: [Public Safety Commission Comment](#); [Paul Riddle](#); [Armine Chaparyan](#); [Michael Cacciotti - Personal](#); [Ted Gerber; ezneimer](#); [PWC Public Comments](#); [Steve Lawrence](#); [City Council Public Comment](#); [William J. Kelly](#); [D. Mahmud \(private\)](#); [Chris Bray](#); [Omari Ferguson](#); [Angelica Frausto-Lupo](#)
Subject: Hazard Mitigation and Future Proofing South Pasadena
Date: Thursday, March 23, 2023 3:18:39 PM
Attachments: [Berkeleyside Undergrounding Utilities.docx](#)

CAUTION: This email originated from outside of the City of South Pasadena. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Public Safety, Public Works Commissioners, and city council members,

Since the time of the 2011 windstorm Nov 30, Dec 1, 2, it has been apparent to me that our small city is ill-prepared to respond to a small scale disaster, much less being prepared for the 'big one,' whenever that may occur. Over the last 10 or so years, I've had periodic conversations with staff, public safety and SCE officials of the need to begin undergrounding electrical wires within city limits, in particular along the main arterials of Garfield and Fremont.

Just to provide a few examples, during the 2011 windstorm event, multiple trees and wire came down just south of the intersection of Garfield/Oak and along Oak between the Oneonta Church and Bushnell. Trees, branches and power lines came down on Marengo one block south of the elementary school, a fallen tree on Primrose completely blocked the street between Maple and Alhambra Road. One part of the city was without electricity for almost two weeks due to fallen and damaged lines. By way of comparison, the city of Pasadena had power restored to all parts of their city within 3 days. Prior to 2011, PWP had undertaken a sustained effort to underground wires, particularly in the hillside areas and main traffic corridors

At the time (2011), the estimated cost to underground wires was about \$1.5 million per mile and South Pasadena had perhaps a few hundred thousand 'banked' with SCE through utility taxes. Per the attached article describing the experience of the city of Berkeley to underground just one district in their city, the costs are 2x - 4x higher now, and the process long and cumbersome.

As the state and city are racing forward with massive electricification programs and goals, it only becomes more imperative that the city begin developing and budgeting an undergrounding strategy that will lessen the risk of our residents being left in the dark, otherwise known as 'mitigation.' As the state is also in process of phasing out natural gas for heating and cooking, residences will only become more dependent on having a reliable source of electrical power to meet essential living needs. If there were a power failure today, I would still be able to boil water and prepare hot meals because the gas lines are already underground.

FEMA has several programs that will provide disaster mitigation grants to communities to help protect life and safety. City emergency officials are already aware of at least some of these, but it will require significant staff time and effort to apply for these and other grants.

This concern crosses many department boundaries, public safety, public works, planning & community development, city management and city council are at the top of the list. As the city revises and updates its' strategic plan and annual budget, I implore and would like to encourage city officials to add future proofing and disaster mitigation to the list of priorities and began allocating & assigning resources towards this purpose. A side benefit of addressing this sooner rather than later will also result in the city suffering fewer distribution related power outages and recovering more quickly from lesser wind/rain/disaster events

Respectfully,

Alan Ehrlich

BERKELEY HILLS NEIGHBORHOOD UNDERGROUNDING ITS UTILITY LINES COULD BE THE LAST OF ITS KIND

It's been a 30-year wait to bury a mile of wires near Tilden. With an eye toward public safety, the city wants to underground many more miles of utility lines, but it's complex and costly, and the rules that guide it are changing.

by [Kate Darby Rauch](#) March 22, 2023, 4:04 p.m.

More than three decades ago, the city of Berkeley launched the process of undergrounding utility lines for a slice of homes bordered by Grizzly Peak Boulevard and Summit Road, next to Tilden Park.

Meetings were held, neighbors polled, funding strategies hammered out.

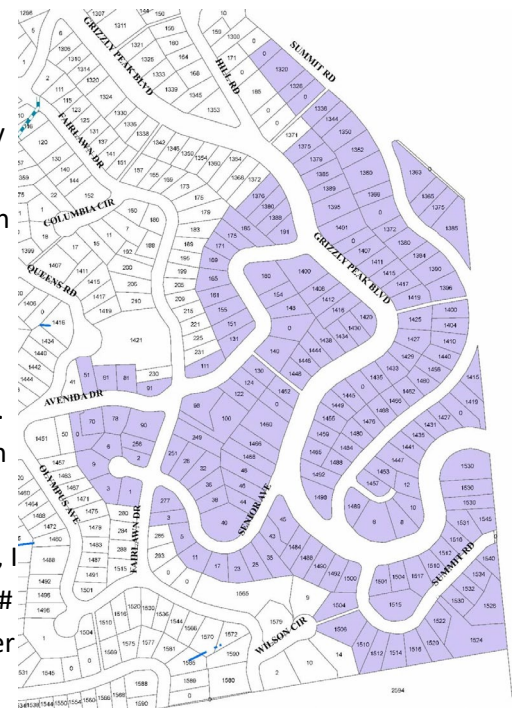
Undergrounding Utility District No. 48. Click the image to expand.

Courtesy: Councilmember Susan Wengraf

One of [numerous neighborhood undergrounding projects](#) in the city in various stages of completion based largely on funding, Undergrounding [Utility District No. 48](#) was established in 1992. Then came years of working with Pacific Gas & Electric (PG&E), which approves and oversees undergrounding, to start moving dirt and burying wire.

This summer work on the Grizzly Peak project is scheduled to begin. The project, removing poles and overhead lines and stretching them in underground trenches, is expected to take two years.

"After waiting 32 years and being disappointed by many false starts, I think I can say with certainty that PGE is committed to getting UUD # 48 undergrounded and it is really going to happen!" Councilmember Susan Wengraf wrote in a recent newsletter from her office.



Wengraf represents the area in undergrounding district 48, and has long worked to move the project forward.

The district includes about 186 households, including that of octogenarian David Nasatir who has lived on Summit Road since 1957, when it was dirt. He recalls voting to support undergrounding years ago. He's still waiting.

See a [history of undergrounding district 48](#) compiled by Berkeley Citizens for Utility Undergrounding, an advocacy group

"I am now 89 years old and have almost abandoned any hope that the project will be started (much less completed) in my lifetime," Nasatir said.

[Undergrounding advocates](#) blame project delays on PG&E's serious troubles of the past many years, including culpability for causing deadly wildfires, gas line explosions and bankruptcies.

Signing agreements with other telecommunications companies such as AT&T and Comcast, who also bury their lines, also took longer than expected, officials from the utility said.

"PG&E has been dragging their feet on this project for three decades. As an agency, they have gone through many crises, and this was not a priority for them," Wengraf said.

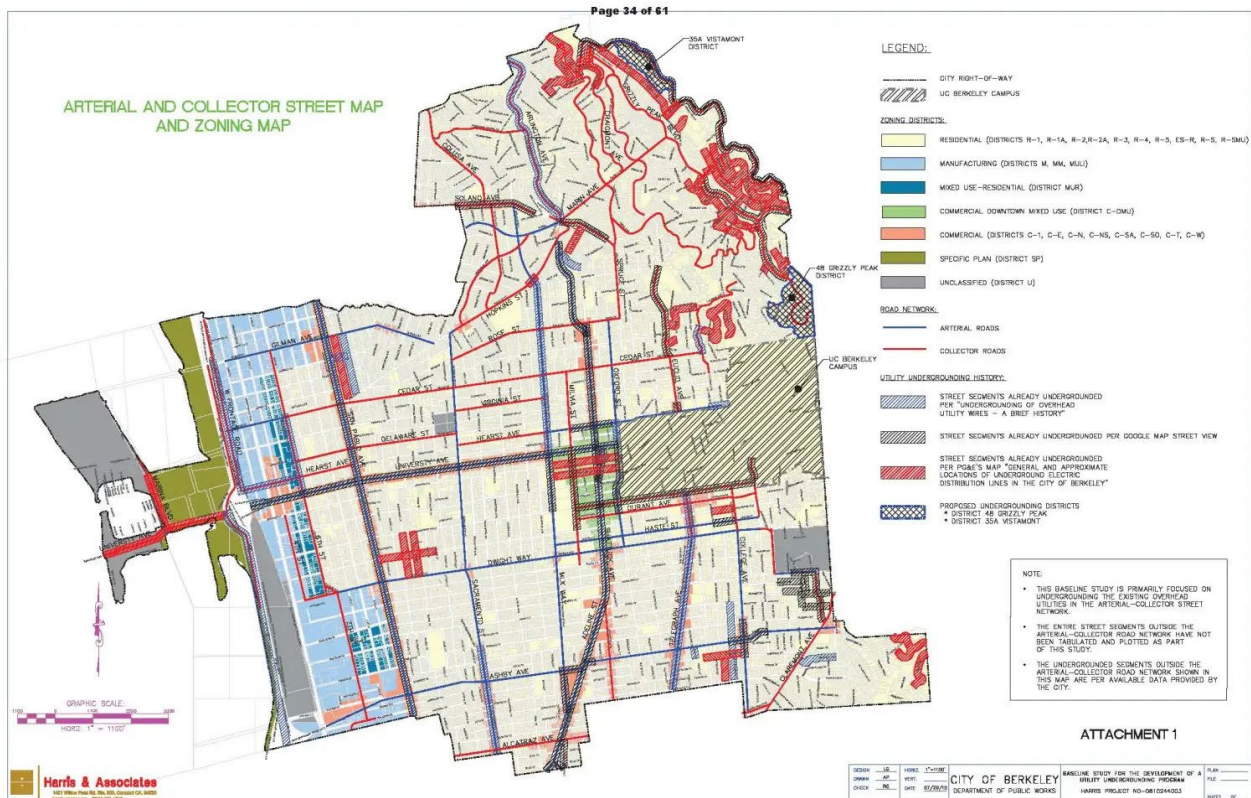


Figure 1: A 2016 city map showing areas of the city with undergrounded utilities. Underground district 48 is shown as “proposed.” Work on this district will start this summer, after more than 30 years of planning. Credit: City of Berkeley

But Berkeley was persistent, including city staff and residents, Wengraf said.

“I was extremely lucky in partnering with a team from inside PGE that was willing to figure out how to proceed and problem-solve on the project and move it forward to get it completed.”

UNDERGROUNDING UTILITIES IS EXPENSIVE AND COMPLEX

Tuesday’s destructive winds, which knocked down trees, power poles and power lines, sparking fires, showed just how vulnerable overhead utility wires are to mother nature.

Most new housing developments routinely underground utilities. Older, established communities like Berkeley face enormous challenges in doing so.

Converting overground utilities to underground is a costly and complicated process, regulated by the [California Public Utilities Commission](#) (CPUC).

In 1967, the CPUC adopted a regulatory process called [Electric Rule 20](#), which provides three main pathways for local areas, cities and counties (unincorporated areas) to convert overhead power lines to underground.

The cost of undergrounding in Berkeley is about \$6 million per mile, on the higher end of the state scale.

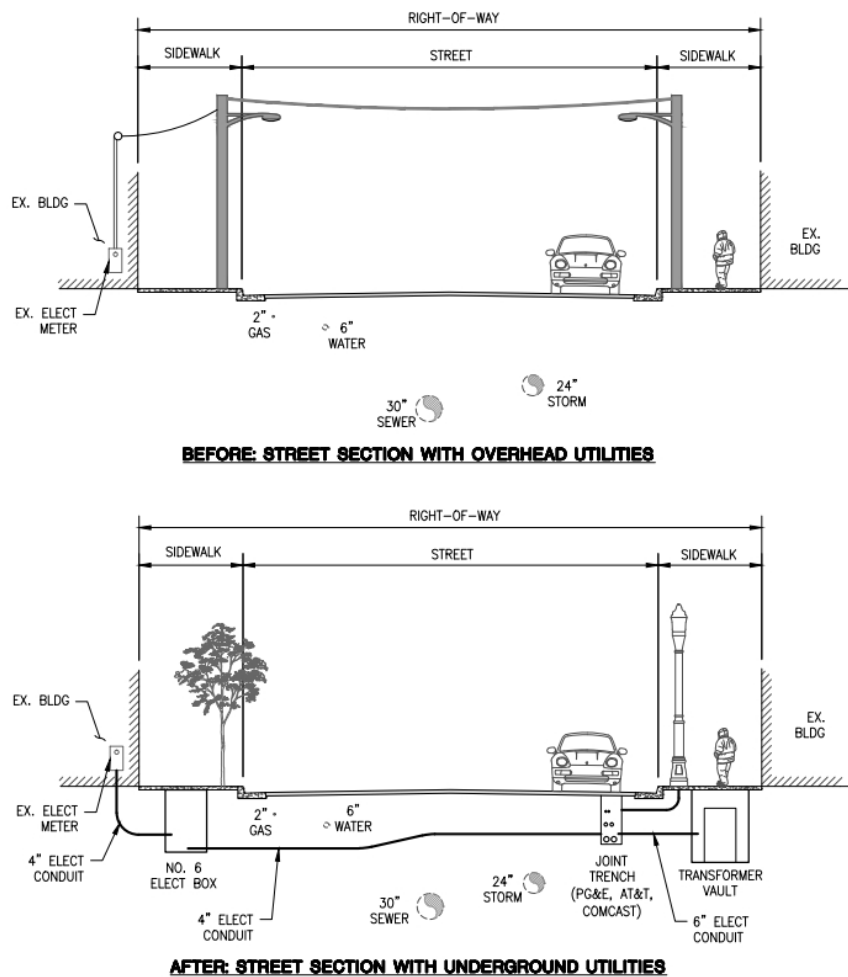
At the time, a main impetus for Rule 20 was aesthetics. Since then, public safety is cited as a main reason

communities are eager to bury electrical lines, a changing sentiment fueled by the jump in destructive wildfires, spurred on by climate change, and by real life images of ripped live wires igniting dry branches and roads blocked by downed power poles.

Under Rule 20, municipalities or private property owners select potential areas for undergrounding, working with their utility company to approve and conduct the job.

Rule 20 options vary based on type of project, with different funding strategies.

Most of Berkeley’s undergrounding, including district 48, is done under Rule 20 A, with eligibility based on “the public interest” under four possible scenarios: heavy traffic; a heavy concentration of wires; a civic or recreational area with unusual scenic, cultural or historical significance; or along a major arterial roadway and connecting side streets.



NOTES:
 1. LOCATIONS ASSUME ADEQUATE CLEARANCES
 2. SHADED FACILITIES ARE EXISTING

FIGURE - 1
DIAGRAMS OF TYPICAL STREET SECTION SHOWING OVERHEAD AND UNDERGROUND FACILITIES IN COMMERCIAL AREA

SCALE: NTS

Rule 20 A projects are paid for almost entirely by rate-payers statewide as part of their utility bill, to the tune of about \$1 a month.

This money, housed by utility companies, is doled out annually to cities and counties in the form of work credits for

Figure 2: A before-and-after diagram from a 2018 city study on undergrounding utility construction.

One work credit is equal to \$1 dollar.

The number of work credits municipalities receive is based on a formula using the number of utility meters in their community.

After PG&E's 2001 bankruptcy, Rule 20 A credit distribution decreased by 50%, greatly impacting the pace of projects, as it took communities much longer to fund work. Before PG&E starts work on Rule 20 A project, it must be fully funded.

Other Rule 20 options include Rule B, with costs primarily covered by a municipality or developer, and [Rule C](#), for small groups of property owners, who pay for all of the project. (A fourth category, Rule D, applies only to San Diego County.)

In its [2023 budget](#), Berkeley allocated \$12 million for completing the district 48 undergrounding project, primarily from work credits. This includes funding for new streetlights, many solar-powered, collected from residents of the district as an assessment.

Berkeley's annual work credit allotment translates to about \$540,000 annually, according to a 2020 city council report on undergrounding. To fund projects, the city saves up.

As of June 30, 2019, the city had a little over \$9 million in its undergrounding budget, most of which will pay for district 48.

"The project is predominantly funded through Rule 20A credits, excluding staff time," said Andrew Brozyna, deputy director of the city's public works department. "To fund the streetlight installation portion of UUD #48 (District), an assessment was levied and collected between FY 1995 and FY1999. All streetlight installation costs beyond what was collected (plus interest accrued) will be covered through use of other City funds."

Rule 20 A allows jurisdictions to count five years of future work credits in project budgets, essentially loans from the ratepayer undergrounding pool.

According to a [2020 city study](#) by consultants Bellecci & Associates, the cost of undergrounding in Berkeley is about \$6 million per mile. This is on the higher end of the state scale, which puts the cost at \$1.85 million to \$6.1 million, according to estimates from the CPUC. Costs vary based on terrain, development and other factors.

Ten [underground districts](#) have been established in Berkeley under CPUC Rule 20 to date, with several more in the planning stages. This includes district 48 and next-in-queue Vistamont Avenue or district 35 A. All but one are 20 A projects, funded by work credits.

Utility lines in areas of the city destroyed by the 1991 firestorm (the Tunnel Fire) were undergrounded when rebuilt.

And most major thoroughfares and streets are undergrounded, in standard practice, using various financing modes. Some of these are paid for with help from BART, UC Berkeley and CalTrans.

It's not clear how Berkeley historically prioritized undergrounding projects outside of major roadways.

In a 2004 report on the "[history of undergrounding](#)," the Public Works Commission described the criteria for selection as: "First come/first served based upon organization and initiative of citizens in local area/district."

The report also said, "Berkeley and Oakland were two cities who aggressively went after Rule 20A funds and formed a long queue of assessment districts in their areas. They convinced PG&E to bend the guidelines and use Rule 20A monies in residential neighborhoods where residents were more willing to pay for private

connection costs (\$2000+ per parcel). PG&E started to face their own problems (rapid demand caused by internet server farms & bankruptcy hearings) [and] they began to refuse to deviate from the original criteria established by the CPUC under Rule 20.”

Berkeleyside has asked PG&E to comment, and hasn't yet heard back.

In 2009, the city council paused forming new undergrounding districts, with its work credits budgeted well into the future, to develop new policy, with [safety emerging as a community priority](#).

FUTURE OF STATE RULES AROUND UNDERGROUNDING ARE IN FLUX



Figure

3: A section of Grizzly Peak Boulevard in the Berkeley Hills that's set to have its utility lines undergrounded. Credit: Ximena Natera, Berkeleyside/CatchLight

funded before the deadline, PG&E assured the city.

Undergrounding district 48 may carry more distinction than simply getting off – or under – the ground. It could be the last of its breed.

Just as PG&E is sharpening backhoes and shovels to — at last — start undergrounding district 48, officials are adjusting to recent, [significant CPUC changes to Rule 20 A](#).

The distribution of work credits, the currency of Rule 20 A, was at least temporarily halted by the CPUC at the end of 2022, a move that came after [years of audits, reviews and hearings](#).

This won't affect district 48, which was fully

But it could affect future undergrounding in Berkeley, including projects in the pipeline such as the city's undergrounding district 35, along Wildcat Canyon Road and Vistamont Avenue.

At a time of heightened interest in undergrounding across California, largely for public safety but also for beautification, the state has been taking a close, hard look at Rule 20, to fix problems and bring the rule into more modern times.

The overhaul, in the works for years with [phased-in changes](#), spotlights the Rule 20 A work credit program as problematic. This underlies the CPUC decision to call off work credit distribution as it hammers out solutions.

The overhaul focuses on several concerns raised by cities, counties, utility advocacy groups and other stakeholders about Rule 20's fairness, management and relevance, according to [CPUC documents](#).

Among the concerns are that allocating 20 A “public good” work credits based on aesthetics is outdated, especially as disaster safety worries rise; that large numbers of work credits translating to millions of dollars aren't being used; and that there's been inconsistent and lax program oversight.

The unregulated trading of work credits among municipalities was also tagged for reform.

The CPUC also flagged inequity in the distribution of work credits, as less populated rural areas with fewer utility meters (including tribal lands) get fewer work credits, making it near-impossible to afford undergrounding.

“In February 2019, the Commission adopted an Environmental and Social Justice (ESJ) Action Plan. The ESJ Action Plan includes nine goals, including the goal of consistently integrating equity and access

considerations throughout Commission proceedings and other efforts,” said a CPUC report on changing Rule 20 A.

“A handful of the 503 communities that pay into the [Rule 20 A work credit] program have completed projects worth hundreds of millions of dollars funded by ratepayer contributions. On the other hand, 82 eligible communities have not completed a single project since 2005.”

Like [multiyear courtroom proceedings](#), CPUC rulemaking and rule changes involve stakeholders statewide, utility companies, cities and counties and advocacy groups. After taking input in numerous public sessions and written correspondence, CPUC staff make recommendations which are then ruled on by administrative judges for final regulations.

Among the information considered by the CPUC for Rule 20 changes was its [2019 audit of PG&E’s Rule 20 A program](#).

The audit identified what the CPUC called several “major issues” with PG&E’s work credit program. This included using undergrounding money on other types of projects, with a lack of paperwork; project costs consistently higher than estimates, causing delays; and project costs higher per mile than industry standards.

PG&E disagreed with many of the audit’s conclusions. But it implemented some of the recommendations on its own accord.

Some of PG&E’s work credit red flags matched practices of other major state utilities, including having millions of dollars in unused undergrounding funds. The CPUC estimated in 2021, that “un-committed Rule 20A work credits across all electric utility service territories is over \$1.56 billion.”

These contributed to the basis for the Rule 20 reform.

BERKELEY PRIORITIZES PUBLIC SAFETY, AND WAITS FOR WHAT’S NEXT

As the [CPUC continues to examine](#) Rule 20, called Phase 2, the commission will consider whether to add wildfire risk as a qualifier for Rule 20 A work credits, and whether work credits should prioritize projects in disadvantaged communities – among other things. Decisions could come later this year.

Berkeley, meanwhile, hopes the CPUC won’t do away with work credits entirely, which is under consideration.

This stance is shared by [many other cities](#), who are pushing the CPUC to expand qualifying criteria to wildfire hazard.

“Berkeley, as a party to the proceedings, is strongly advocating to the CPUC for the continuation of the Rule 20A work credits,” said Andrew Brozyna, an engineer in the city’s Public Works Department.

Long-interested in undergrounding, the city council asked the Public Works, Disaster & Fire Safety and Transportation commissions in 2014 for a comprehensive study on undergrounding.

The study, essentially a cost-benefit analysis, focused on major roadways as essential for emergency access,

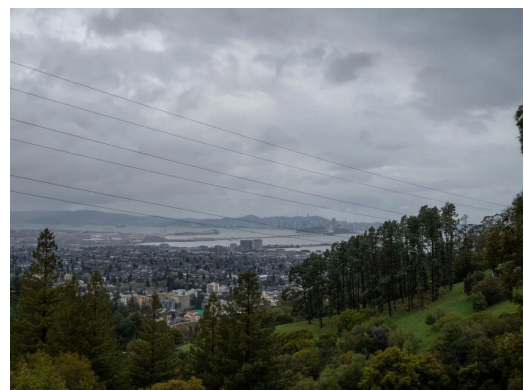


Figure 4: Powerlines cross the hills along Grizzly Peak Boulevard. Credit: Ximena Natera, Berkeleyside/CatchLight

as evacuation routes, and for the movement of emergency vehicles.

Public safety, reliability, aesthetics, wildfire risk, and maintenance costs were identified as primary reasons the city should underground.

It was released in three phases, updated along the way.

- [Undergrounding Phase 1 report, 2015](#)
- [Undergrounding Phase 2 report, 2018](#)
- [Undergrounding Phase 3 report, 2020](#)

The report makes clear the serious challenge of paying for undergrounding, cost-prohibitive for the city budget, even with Rule 20 A work credits. It suggests a variety of undergrounding funding strategies, including tax increases, franchise fees, and bonds; and notes that Rule 20 is under review by the CPUC, and could change.

In the storms of recent weeks, sparks have flown as trees fell on power lines.

These types of scares — there's been no serious fire damage during the storms, and major fire in sappy conditions is unlikely — is a kind of "proof in the pudding" for the city staff and commission members working on the undergrounding study.

Major streets examined for undergrounding are: Alcatraz/Claremont avenues, Ashby Avenue/Tunnel Road, Cedar Street, Gilman Avenue and Hopkins Street; Marin Avenue, Grizzly Peak Boulevard, and Spruce Street, Oxford Street, and Rose Streets.

The third phase of the study built on this, narrowing down key evacuation routes to underground.

Upper Dwight Way is recommended as the highest priority evacuation route. This is followed by lower Dwight, then sections of Marin Avenue, Grizzly Peak Boulevard (north of district 48) and Ashby Avenue. In all, 15 evacuation routes are recommended for undergrounding, over a 15-year period.

The long-term recommended goal is to underground the entire city by 2070.

Other developments loom over the city's undergrounding hopes, introducing more unknowns.

This includes PG&E's 2021 widely announced plan to [underground 10,000 miles of its lines](#) statewide, as part of its wildfire prevention work.

According to its website, the utility has completed 180 miles of undergrounding to date, with another 350 planned for this year.

Berkeley's undergrounding district 48 is included in PG&E's mile-count for 2023, said Matt Nauman, PG&E spokesperson.

"When Rule 20A projects happen in areas at high risk of wildfire, we include them in our goal to underground 10,000 miles of distribution powerlines," he said. "We are focusing our 10,000-Mile Undergrounding Program in areas where we can have the greatest impact on reducing wildfire and wildfire safety-related outages."

The utility has also embarked on [major system retrofitting — or hardening — against wildfire](#).

Add to this the as-yet-unknown impact of [Senate Bill 884](#), signed by Gov. Gavin Newsom last year. The law creates an expedited process for large utilities like PG&E to underground in high fire hazard zones, with faster permitting.

The law, which requires independent monitoring and regular reporting to the CPUC, calls on utilities in the fast-track program to take steps to reduce rate-payers' costs, such as applying for federal and state grants.

But critics of the law, including [The Utility Reform Network](#), say ratepayers will end up shouldering the brunt of the costs, and worry that higher bills to pay for undergrounding will undermine the cost-saving motivation of going solar.

Back in Berkeley's undergrounding district 48, Nasatir worries about wildfire in his neighborhood.

"This particularly wet winter promises abundant fuel for the coming fire season and narrow, dead-end Summit Road, with a sharp turn in the middle, diminishes the prospect of a hasty and successful escape should such an activity be necessary," he said. "Downed power lines would make it impossible."

SOURCE: [HTTPS://WWW.BERKELEYSIDE.ORG/2023/03/22/BERKELEY-HILLS-UNDERGROUNDING-UTILITY-LINES-PGE-CALIFORNIA-PUBLIC-UTILITIES-COMMISSION-RULE-20?MC_CID=DB42E6BBBD&MC_EID=5C49FEA390](https://www.berkeleyaside.org/2023/03/22/berkeley-hills-undergrounding-utility-lines-pge-california-public-utilities-commission-rule-20?MC_CID=DB42E6BBBD&MC_EID=5C49FEA390)
