

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Examine
Electric Utility De-Energization of Power
Lines in Dangerous Conditions

Rulemaking 18-12-005
(Filed December 13, 2018)

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION
RESPONSES TO COMMENTS AND PROPOSALS
FILED ON SEPTEMBER 17, 2019**



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I. INTRODUCTION

The California Community Choice Association (“CalCCA”), the trade association representing Community Choice Aggregators (“CCAs”), appreciates the opportunity to submit the following responses to comments and proposals submitted by parties on September 17, 2019 in response to the *Assigned Commissioner’s Phase 2 Scoping Memo and Ruling* issued August 14, 2019 (“Phase 2 Ruling”). CalCCA was granted party status in this proceeding via email ruling on June 17, 2019.

II. BACKGROUND

In the Phase 2 Ruling, the Commission requested that the Investor Owned Utilities (“IOUs”)¹ specifically, and other parties as interested, provide proposals in response to several questions. CalCCA notes Decision (“D.”) 19-05-042 directed that Phase 2 of this proceeding would consider issues that were outside the scope of Phase 1. Therefore, the Commission may find that the timeline established in the Phase 2 Ruling may need further adjusting to accommodate robust and adequate discussion of many of the suggestions, insights, and comments provided by the parties in their proposals. In the instant Rulemaking, the Commission is considering issues with very significant implications for the health, safety, and well-being of the public. Robust discussion of these issues is essential. While some issues require expedited resolution, for the most part, consideration of these issues should not be rushed. CalCCA reviewed all of the proposals and comments and generally

¹ San Diego Gas & Electric (“SDG&E”), Southern California Edison (“SCE”), and Pacific Gas & Electric (“PG&E”) collectively referred to as the IOUs.

distilled them into seven primary issues. On each of those issues, CalCCA has identified areas of agreement and disagreement, issues that should be addressed in a workshop setting and issues that ought to be addressed in new tracks of this proceeding.

III. COMMENTS ON PROPOSALS

Issue 1: Definitions And Standard Nomenclature

Critical Facilities And Infrastructure

CalCCA believes the variety of recommendations indicates the need for a stakeholder workshop to reach consensus on the nomenclature. Several parties proposed reasonable additions to the definition of Critical Facilities and Infrastructure (“CFI”). In addition to the facilities and infrastructure identified in CalCCA’s proposal, CalCCA supports the following specific additions to the definition of CFI proposed in parties’ comments:

- Facilities that have been designated by a local government entity as a staging site or shelter site.²
- Transportation facilities identified by the Commission in D.02-04-060, including navigation communication, traffic control, and landing and departure facilities for air and sea operations” and “rail rapid transit systems as necessary to protect public safety.”³
- All primary, secondary, and post-secondary schools, including directly affiliated administrative facilities.⁴
- CalTrans facilities.⁵

In addition, CalCCA agrees with the Western States Petroleum Association (“WSPA”) that petroleum-related facilities other than refineries should be included in the definition of CFI. However, CalCCA disagrees with WSPA’s position that such facilities should be treated as CFI because of their economic importance. By definition, a Public Safety Power Shutoff (“PSPS”) event

² See Rural County Representatives of California (“RCRC”) Comments at 3. All further references and citations to “Comments” refer to Parties’ September 17, 2019 Comments and Proposals in the instant Rulemaking unless otherwise noted.

³ City and County of San Francisco (“San Francisco”) Comments at 3.

⁴ See Direct Access Customer Coalition (“DACC”) Comments at 2.

⁵ See Terjung and Naylor Comments at 4-5.

has the potential to freeze or substantially limit economic output in the affected area. While it is true that the petroleum industry is a key economic sector for California and the nation as a whole, the same can be said for other essential economic sectors such as mining, agriculture, and manufacturing. However, it clear that not all farms, mines, and factories qualify as CFI. Petroleum-related facilities should only qualify as CFI to the extent that they deal with toxic, explosive, and flammable chemicals that could pose a risk to public safety if the facility loses electricity.⁶

A small number of parties opposed expanding the definition of CFI beyond the definition adopted in Phase 1,⁷ and one party, SDG&E, argued that the current definition of CFI is “overly broad” and should be narrowed and aligned with definitions used by other state agencies.⁸ These parties’ arguments are fundamentally flawed, as they ignore the distinct purpose served by developing a definition of CFI that is specific to the PSPS context. Other agencies have defined CFI in the context of other specific threats, such as wildfires and terrorism. In the PSPS context, “CFI” consists of those facilities and infrastructure that rely on electricity, provide essential public health and safety functions or public services, and would experience significant disruption of their ability to provide these services if electric power were interrupted. A detailed, specific, and comprehensive definition of CFI and list of the facilities and infrastructure that qualify as CFI are essential to fulfilling the following basic PSPS response functions:

1. Identifying all CFI operators that need to be included in the IOUs’ mandatory lists of primary and secondary 24/7 emergency contacts.
2. Ensuring that CFI operators receive priority notification (with documented confirmation) of PSPS events.
3. Identifying CFI that has the greatest need for PSPS resiliency resource funds.

⁶ However, CalCCA believes that the potential economic impact of PSPS, including the potential economic impact on the petroleum sector and secondary impacts on consumers and the economy as a whole from interrupted operations of petroleum facilities, should be considered by the IOUs in deciding whether to de-energize a particular line or lines during a PSPS event.

⁷ See, e.g., California Association of Small and Multi-Jurisdictional Utilities (“CASMU”) Comments at 4.

⁸ See SDG&E Comments at 2.

4. Ensuring that all facilities that are essential to public health and safety or that provide critical public services have their backup generation needs assessed by the IOUs, and ensure IOU pre-approval for IOU-provided backup generation.⁹

Under SDG&E’s proposal, a range of facilities that are critical for public health and safety would be removed from the definition of CFI. For instance, SDG&E’s proposed definition would exclude 911 call centers, hospice care facilities, residential mental health facilities, and a significant number of other facilities and infrastructure that, in a PSPS event, is required to maintain public health, safety, and the provision of essential services.

A number of parties identified facilities and infrastructure that serve an important public function but are not currently included as an *essential* public service. For instance, libraries and post offices do not provide an essential public service of immediate and urgent need (unless a given library or post office has been designated as an emergency shelter or staging site). Similarly, CalCCA does not support the elevation of electric vehicle (“EV”) chargers to critical infrastructure as proposed by the California Energy Storage Alliance (“CESA”),¹⁰ since chargers and charging stations serve the same function as gas stations (providing fuel for vehicles), which are not currently considered critical facilities. During a PSPS event, fueling any vehicle (electricity or fossil fuel dependent) is likely to present a similar challenge of inability to “load” the vehicle (i.e., recharge or refuel).

PSPS Phase Nomenclature

CalCCA asks that when the Commission considers terms used for pre-, during, and post-PSPS, those terms be consistent, simple, understandable, and easy to translate into multiple languages. The PSPS terms should also be differentiated enough from disaster response terminology to avoid confusion or conflict with other statutes and regulations. Various parties have proposed differing PPS terminology: PG&E proposes a nomenclature for the various stages of a PPS event;¹¹ multiple parties provided variations of language for PPS Phase names; and Mr. Abrams proposed replicating federal designations for event stages, including preparedness, response,

⁹ See, D.19-05-042 at 73-74 (“the utilities must assist critical facility and infrastructure customers to evaluate their needs for backup generation and determine if additional equipment is needed, potentially including utility-provided generators for facilities that are not well prepared for a power shut-off”)

¹⁰ See CESA Comments at 2.

¹¹ See PG&E Opening Comments on Phase 2 Ruling at 3.

recovery, and mitigation.¹² Through a workshop, the Commission could ascertain appropriate terms for PSPS phases from stakeholders themselves. CalCCA also suggests that terms be adopted to distinguish between possible, planned, and (actual) ongoing PSPS events.

Issue 2: Vulnerable Customers / Increased Risk Individuals

The majority of parties that commented on the Medical Baseline issue agreed that the current Commission Rules and IOU practices for identifying and enrolling all eligible Medical Baseline Customers are inadequate and must be improved. SCE and SDG&E offered general acknowledgements that the Commission should refine the approach for Medical Baseline customers. Both the Joint Local Governments and San Francisco stress the importance of requiring that the IOUs work with local jurisdictions to identify and enroll eligible Medical Baseline customers.¹³ The Utility Reform Network (“TURN”) identifies Medical Baseline under-enrollment as an urgent problem, stating that “the profound underutilization of the Medical Baseline program should be addressed quickly and efficiently as possible.”¹⁴

CalCCA strongly agrees that the IOUs should be required to significantly improve their practices for identifying and enrolling Medical Baseline customers, with a goal of 100% enrollment of all eligible customers. CalCCA further agrees that the IOUs should be required to coordinate closely with local jurisdictions to improve Medical Baseline enrollment.

Similarly, a number of parties noted the importance of identifying and taking steps to protect Access and Functional Needs (“AFN”) customers. The Center for Accessible Technology (“CforAT”) argued that the Commission should focus on methods outside the Medical Baseline designation to identify AFN customers and ensure that they are not put at risk during a de-energization event.¹⁵ San Francisco argued that the Commission should require that the IOUs develop and regularly update lists of AFN persons, and provide targeted outreach to vulnerable populations by entering into data sharing agreements with agencies that provide services to AFN persons. CalCCA strongly agrees that AFN persons are at a substantially increased risk of harm during a PSPS event and that the IOUs are responsible for whatever steps are necessary to mitigate

¹² See Comments of William B. Abrams at 6.

¹³ See San Francisco Comments at 4.

¹⁴ TURN Comments at 3.

¹⁵ See CforAT Comments at 6.

this harm, including maintaining lists of AFN individuals, data-sharing with appropriate agencies, and targeted outreach.

However, as CalCCA noted in its Proposal, it is essential that the IOUs identify *all residents that are at a substantially increased risk of harm during a PSPS event*. Medical Baseline customers are one subset of a broader group of Increased Risk Individuals (“IRIs”), and AFN persons are another subset of IRIs. However, there are many IRIs that may not qualify for or be enrolled in the Medical Baseline program and do not meet the definition of AFN. Thus, while CalCCA supports requirements and program changes aimed at significantly increasing Medical Baseline enrollment, and proposed steps to improve protections for AFN persons, these alone may only partially address the need, leaving many vulnerable individuals that must be identified through other means. As noted by the City of San José, medical baseline tariffs are one way to identify individuals who need assistance during a PSPS event, but they are merely an economic billing program.”¹⁶ An IOU’s list of Medical Baseline customers is not a comprehensive list of all individuals at an increased risk of harm due to a PSPS event.¹⁷ As San José further notes:

The program is not well-known and relies on individuals with enough knowledge to sign up for the special electrical rates/fees. But not everyone who requires electricity for life-supporting services (e.g., using a ventilator) will have signed up for this program and could therefore be missed during a PSPS.”¹⁸

Identifying *all* IRIs is essential to mitigating the worst potential harms of PSPS outages. A complete list of IRIs, along with some kind of risk categorization, is essential for the utilities to (1) target priority notification (with documented confirmation); (2) notify authorities of customers at immediate, life-threatening risk during an outage (such as customers on electrically powered life-support equipment); and (3) identify the customers with the greatest need for resiliency resources.

CalCCA recognizes that identifying all IRIs is a large task that raises a number of policy, legal, and practical issues.¹⁹ CalCCA proposes that the Commission initiate a separate, dedicated

¹⁶ Comments of the City of San Jose at 4.

¹⁷ CalCCA Comments at 12.

¹⁸ *Id.* at 4.

¹⁹ CforAT Comments at 3 (noting that utilities might not be the best place to concentrate AFNs information and that the IOUs must take additional steps year-round to acclimate AFNs to PSPS events and to raise awareness of data sharing needs for AFNs populations. CforAT observed that low income AFNs or households without transportation may not have the listed means of communication that IOUs employ for notifying PSPS affected individuals.). CforAT also acknowledges that communication with AFNs requires special approaches beyond the standard established communication methods already established, at 9.

track of the instant Rulemaking focused on PSPS rules to protect Vulnerable Populations / IRIs. This track would include the consideration of PSPS-related issues as they apply to Medical Baseline, AFN, and all other IRIs, and should, at a minimum, address the following questions:

- Definition of IRIs (in addition to Medical Baseline and AFN customers):
 - What other groups should be included in the definition of IRIs?
 - Should IRIs be divided into “tiers” or otherwise categorized according to likelihood and potential severity of harm in a PSPS event? If so, how should these tiers be defined?
- How should the IOUs identify and track IRIs?
- What Commission oversight is required to ensure that the IOUs are adequately identifying IRIs and maintaining current contact information?
- What privacy protections or modifications to existing privacy rules are necessary to protect IRIs?
- What steps should the IOUs be required to take to ensure that IRIs have access to resiliency resources?

Some parties proposed that any matters relating to the Medical Baseline program be separated from this proceeding. CalCCA strongly opposes this proposal. Medical Baseline customers (and other IRIs) face a unique set of risks due to PSPS events, and mitigating these risks requires a set of IOU actions and requirements that are distinct to the PSPS context. Separating the Medical Baseline issue further risks creating a serious disconnect between inter-dependent issues, due to a separate record being developed and risks limiting participation of parties and misalignment with the progress in Phase II of this proceeding.

As part of this proposed Vulnerable Populations / IRIs track, CalCCA recommends that the Commission hold a at least one workshop with community-based organizations and local governments that have experience in communicating to AFN populations to identify further steps to take.

Issue 3: Transmission and Distribution

CalCCA agrees with PG&E that the Commission should establish clear, standard definitions for “transmission level PSPS” and “distribution-level PSPS.”²⁰ However, CalCCA differs from

²⁰ PG&E Comments at 3.

PG&E in believing that it is essential that the Commission adopt a single standard definition for all IOUs. The definitions adopted by the Commission will affect communications and notifications, as well as designation of “transmission level” customers, and should be as clear and straightforward as possible. As is apparent from SCE and PG&E’s comments,²¹ the distinction between so-called “sub-transmission” and “distribution” lines is functional, depending on an electric system’s design, and the voltage level that distinguishes between “sub-transmission” and “distribution” differs significantly between the IOUs. Rather than adopting separate definitions of “distribution” and “transmission” for each IOU to reflect this difference – an option which would almost certainly lead to significant confusion – CalCCA supports the Energy Producers and Users Coalition (“EPUC”) proposal that the Commission adopt a single set of baseline definitions based on California Independent System Operator (“CAISO”) control. “Transmission” lines and facilities would be those that have been transferred to CAISO control, and “distribution” lines and facilities would be those that remain fully under the control of the IOUs.²² CalCCA agrees with the California Municipal Utilities Association (“CMUA”) that clarification on this matter is necessary,²³ and proposes that the Commission hold workshops to clarify this baseline definition and determine if any further actions need to be taken to ensure compliance with CAISO rules and other regulatory requirements.

CalCCA is concerned by PG&E’s statement that further clarity from the Commission on this topic is necessary “since the notification process and Federal Energy Regulatory Commission standards of conduct, for example, are different for transmission events than for distribution events.”²⁴ This statement is very troubling, and implies that PG&E may be intending to withhold advance notice of transmission-related PSPS events to certain Public Safety Partners. CCAs need access to PSPS transmission-related information to modify their power scheduling to match the reduction in load due to the outage *as required by CAISO rules*. The Commission should clearly direct the IOUs to provide transmission-related PSPS information to all Public Safety Partners.

Issue 4: Public Safety Partner Access To PSPS Information

CalCCA recommends the Commission initiate a new track in this proceeding to address concerns regarding access to confidential customer data. First Responders and Public Safety Partners

²¹ See SCE Comments at 2-3; PG&E Comments at 3.

²² See EPUC Comments at 5-6.

²³ See EPUC Comments at 5-6

²⁴ PG&E Comments at 3.

need to access necessary data in advance of, and during, PSPS events to prepare response plans, evacuation and transportation plans, and resiliency center location evaluations. PG&E has limited access to this information by demanding that Public Safety Partners, including CCAs, execute overbroad and burdensome non-disclosure agreements (“NDAs”). These NDAs have been neither reviewed nor approved by the Commission, and would be enforced by PG&E, not the Commission. These NDAs reduce the ability of emergency responders and local governments to ensure public safety. CCAs have a broad right to relevant customer information, and are subject to the Commission’s customer privacy rules, rendering any NDA requirement duplicative and unnecessary.²⁵ Other first responders and local government units are not similarly situated. As the Joint Local Governments point out, the IOUs’ requirement that local governments sign unreasonably restrictive IOU-imposed NDAs might delay the dispatching of third-party resources like ambulances. The Commission explicitly recognized the information-sharing problems created by PG&E’s NDA in President Batjer’s October 14, 2019 Letter to PG&E. In this letter, President Batjer directed PG&E to take a range of immediate corrective actions, including:

Develop processes and procedures for sharing information of medical baseline customers that can be impacted by a specific PSPS event... the utilities are expected to share medical baseline information with counties and tribal governments, if requested, without a memorandum of understanding or non-disclosure agreement during PSPS events.²⁶

The letter further directed PG&E to:

Develop processes and procedures for sharing information on critical facilities with counties and local governments during events. This must include a solution for sharing information with counties and local governments even if there is no existing memorandum of understanding or non-disclosure agreement.²⁷

CalCCA strongly agrees with these directives, and asks that the Commission explicitly extend them to CCAs, clarify that these directives apply to information both during and prior to PSPS events, and incorporate them into the PSPS Rules.

The Joint Local Governments note that the federal Health Insurance Portability and Accountability Act of 1996 (“HIPPA”) establishes a framework that respects an individual’s privacy while addressing the need for multiple parties to access the requisite information to provide medical care; it allows for sharing an individual’s information without obtaining consent in each instance, and

²⁵ See, generally, D.12-08-045 (adopting customer information confidentiality rules for CCAs).

²⁶ At 4-5.

²⁷ *Id.* at 5.

in turn binds those who receive the information from disclosure.²⁸ CalCCA further with the Joint Local Governments that the Commission needs to take up the topic of confidential customer data and make it a priority. The Commission should ultimately adopt a single set of PSPS privacy and confidentiality rules that applies to all IOUs and Public Safety Partners to address the issues of medical baseline customers, rules on confidentiality, and AFNs needs as discussed in Issue 4, below. AFNs need improved and expanded communication. These are complex issues that merit a careful policy analysis that balances the needs of Public Safety Partners with personal or confidential information in order to avoid life-threatening situations and provide essential services with a variety of privacy and confidentiality considerations.

To address these complex issues, CalCCA requests that the Commission open an additional track in this Rulemaking to address the public safety and customer privacy implications of PSPS information-sharing with Public Safety Partners. The goals of this track should be to:

- Develop a single standardized NDA, or set of customer information privacy rules, for non-CCA Public Safety Partners that:
 - Does not impose unreasonable or burdensome terms on Public Safety Partners.
 - Allows adequate flexibility to share confidential information when necessary to protect life and property.
 - Is overseen and enforced by the Commission, not the IOUs.
- Consider any changes to existing IOU and CCA customer privacy rules that are needed for the PSPS context.

Because adequate information sharing is essential to protecting public safety, CalCCA asks that this proposed track be expedited.

Issue 5: Establishing Standardized PSPS Criteria

Most of the parties that commented on Standardized PSPS Criteria agreed that some flexibility is necessary to allow the IOUs to account for regional variation and opposed the fixing of *absolute* criteria for PSPS. CalCCA agrees with these parties that, as a general matter, absolute criteria do not allow for the flexibility necessary to address differences between IOU territories, line states, vegetation, geography, and other factors. At the same time, CalCCA strongly supports the adoption of a “floor” for the IOUs – a minimum set of criteria that an IOU must consider, and

²⁸ See Joint Local Governments’ Comments at 12.

analysis that the IOU must conduct, before initiating a PSPS event. This minimum analysis should consist of a balancing test that balances, on one hand, the likelihood and potential extent of harm from not deenergizing (measured as likelihood of ignition and the probability of the fire spreading), and, on the other hand, the likelihood and extent of harm caused by the PSPS. In its Proposal CalCCA provided a specific list of minimum criteria that should be considered by IOUs in this balancing test.²⁹ CalCCA urges the Commission to make the tracking, quantification or measurement (where appropriate), and consideration of each of these minimum criteria as mandatory for each IOU. Each IOU should be allowed to account for regional variation by assigning different weighting to the mandatory minimum criteria, or by including additional, region-specific criteria to its analysis.

A mandatory minimum set of criteria and balancing test methodology is needed to reduce disparities among IOUs. The Commission should hold a workshop on this topic. The Mussey Grade Road Alliance (“MGRA”),³⁰ for example, noted that from June 2019 to September 2019:

SCE has issued 6 de-energization reports, PG&E has issued 1 de-energization report, and SDG&E and the small IOUs have issued none. The disparity between these numbers indicates that there may be a major difference in approach to shutoff criteria between the major utilities.³¹

MGRA further notes that the Commission should be concerned that SCE is on the verge of shutoffs so often.³² The disparity may indicate that a standard set of criteria is warranted. The City of San Jose argues that criteria are necessary.³³

Several parties opposed or expressed caution towards any level of standardized criteria. PG&E notes that while standardized criteria are appealing, there are variations among the IOU territories, that may work against standardization. The CASMU supports a non-standardized criterion that is process reflective, rather than fixed, explaining:

Best practices or applicable criteria for assessing wildfire risk and/or de-energization events will vary for different utilities. Many tools used to assess and analyze landscapes or fire conditions are resource dependent. Small utilities, like the CASMU members, will not have the same resources or the same tools as the Large IOUs.³⁴

²⁹ CalCCA Proposal at 15-18.

³⁰ MGRA Comments at 7.

³¹ *Id.* at 9.

³² *Id.*

³³ *See* Comments of the City of San Jose at 11.

³⁴ Proposal of Bear Valley Electric Service (U 913 E), A Division of Golden State Water Company, Liberty Utilities (CalPECO Electric) LLC (U 933 E), and PacificCorp (U901 E) at 9.

The Public Advocates Office cautions the Commission against setting criteria that create rigid thresholds that could impair flexibility or incentivize adverse actions.³⁵ EPUC agrees the statewide criteria is useful but believes defining risk criteria by the service territory might better serve customers.³⁶ WSPA concurs that some criteria are needed, but warns that prescriptive criteria could be problematic for certain service areas based upon the terrain and electric wire conditions.³⁷

These concerns are adequately addressed by CalCCA's proposal to allow regional variation in the weighting of mandatory minimum criteria and the consideration of additional criteria. Although most of the minimum criteria proposed by CalCCA consist of information all utilities should already have (i.e. records of line maintenance, pole type, conductor type, time since last brush clearing, etc.) a small handful of CalCCA's proposed criteria are somewhat resource dependent. For instance, vegetation moisture measurements may require the use of drone and satellite resources that some IOUs do not currently have in place. The Commission should reasonably accommodate the IOUs' starting points and allow for some degree of phase-in in establishing mandatory minimum criteria.

CalCCA agrees with the Joint Local Governments that the Commission should require that the IOUs' not only document the conditions the IOU used to evaluate the PSPS event, but also a transparent disclosure of the decision process, measured steps taken, and any additional variables the IOU used to determine whether or not to call a PSPS event.³⁸ If these details are incorporated, the Commission could use this information to establish standards to balance the potential safety benefits to be gained from PSPS against the potential harms caused by PSPS.

As a component of the risk assessment, WSPA recommends that the Commission call for a study and cost-benefit analysis of shutoffs, similar to the models used in the insurance industry.³⁹

The Utility Consumers Action Network ("UCAN") concurs, noting:

Shutoff thresholds should be optimized through a risk/benefit or cost/benefit analysis and that remediation plans be put in place to strengthen infrastructure over time and raise shutoff thresholds. In particular, UCAN supports the suggestion that "in order for a utility to assert that it has used shut-off as a 'last resort,' it needs to demonstrate that it has clearly quantified the risks introduced by shutoff and showed them to be lesser than those of leaving lines energized."⁴⁰

³⁵ See Proposal of the Public Advocates Office at 3.

³⁶ See EPUC Comments at 10.

³⁷ See Comments of WSPA at 7.

³⁸ See Joint Local Governments' Comments at 18.

³⁹ See WSPA Comments at 8.

⁴⁰ UCAN Comments at 5.

If the Commission decides to consider a cost-benefit risk analysis, CalCCA recommends a workshop to allow stakeholders the opportunity participate the development of the methodology for making these calculations. Finally, CalCCA agrees with WSPA that the Commission should clarify that the IOUs are not immune to claims for consequential PSPS damages and liabilities caused by a PSPS event.⁴¹ The questions of what those costs would be and how they would be allocated merits another track in this proceeding.

Issue 6: The Role of CCAs in PSPS

All the IOUs and several other parties agree that CCA notification responsibility with respect to a PSPS event is limited to acting in a supporting role. As SCE states, CCAs should not be primarily responsible for communication of PSPS events. Only the Small Business Utility Advocates (“SBUA”) recommend that the CCAs should be required to communicate directly with customers regarding impending PSPS events. While CalCCA appreciates SBUA’s acknowledgment of the relationships CCAs develop with their local commercial and industrial customers, the IOUs—as the grid operators and the ultimate PSPS decisionmakers—are in the best position to serve in the primary communication role. CCAs lack the immediate access to the necessary information to adequately and accurately serve as the front lines of communications about PSPS events. CalCCA generally agrees with the IOUs that state the CCAs should refer questions about PSPS events to the IOU which delivers the power in their respective areas consistent with PG&E’s and SCE’s Electric Rule No. 23 C5(a) and SDG&E’s Electric Rule 27.

CalCCA is open to discussion about how CCA roles may change in preparation for PSPS events in the future. The comments here regarding the role of CCAs in PSPS focus on notification and communication. The CCAs could also play important roles in raising PSPS awareness and developing PSPS mitigation measures, such as micro-grids.

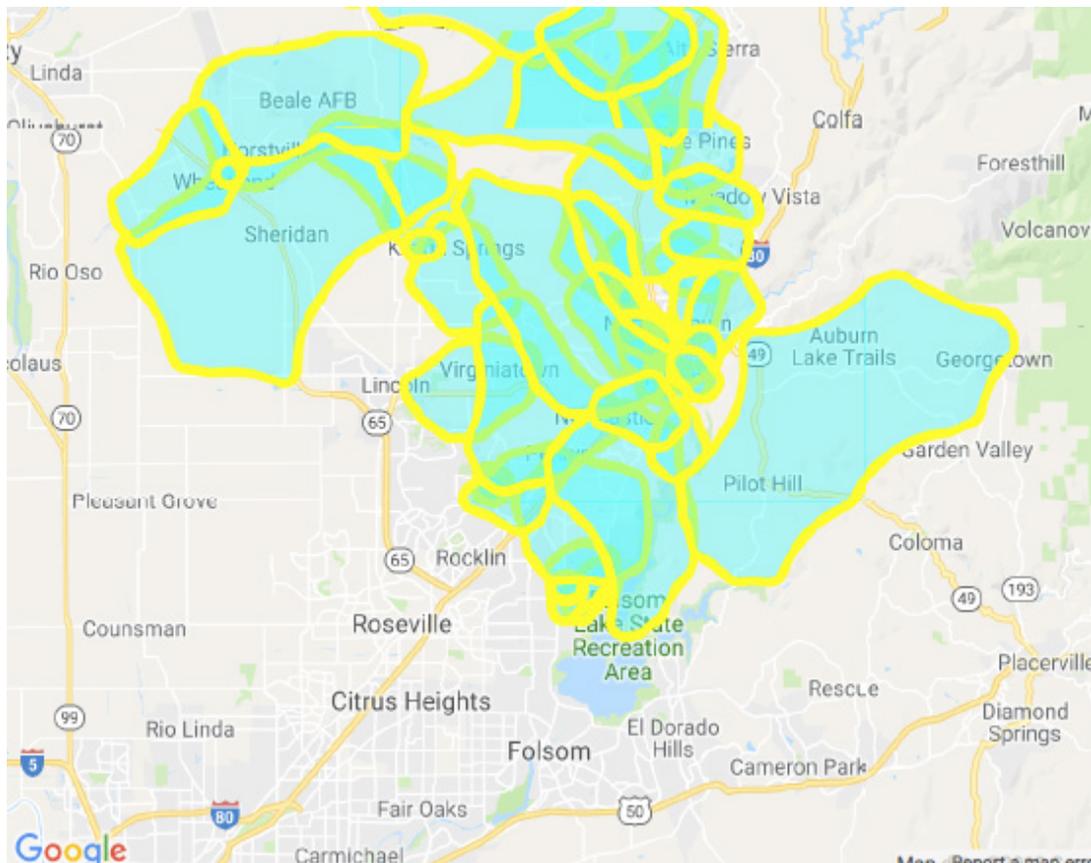
Issue 7: Type of Information Provided and Notifications for PSPS Events

CalCCA members have had varied experiences with IOU information dissemination during PSPS events, but generally note that communication needs improvement. Many parties expressed frustration with the inadequate depth and breadth of communication around PSPS events. The recent PG&E September 23-25, 2019 PSPS event (the “September Event”) illustrated many of these issues.

⁴¹ See WSPA Comments at 8.

Generally, IOUs should provide more clear, timely, and complete information to a broader swath of individuals and entities, provide unique information to at-risk populations, and consult with local communities on placement of CRCs. For example, during the September Event, CCAs received notice that the power had already been or would be shut off, but they were given neither a precise time nor exact location. CCAs received customer lists, but did not receive critical information, like the load, latitude/longitude, maps and targeted circuits beyond the immediate meter. In PG&E's territory during this PSPS event, the use of polygons for information reflected 100 feet around the circuit connection.

Image 1: Public map of September PSPS Event in Placer County⁴²



These polygons overlapped, causing some areas that were completely surrounded by PPS shutdowns to appear unaffected by the PPS event. When pressed for clarity, PG&E indicated that areas islanded in such a manner were likely to lose power. PG&E also advised that checking specific

⁴² The overlapping polygons indicate areas likely to be shut off. The impacted area has an island in the center that appears to be unaffected. Clarification from the IOU indicated that the area would most likely be affected though customers in the island area were not contacted.

addresses on the website would provide the best information. Notifications for the September Event began 48 hours ahead of time. The emails for PG&E territory on the September Event read:

This courtesy notice is for government officials. To protect public safety, PG&E has turned off or will soon turn off power in portions of Butte, Napa, Nevada, Placer, Plumas, Sonoma and Yuba counties. We have been reaching out to customers asking that they prepare emergency plans and supplies.

Power will remain off until weather conditions improve and it is safe to restore service. Outages could last for multiple days. Maps of impacted areas are available at pge.com/pspsseventmaps. We will continue to keep you updated.

From experience with previous PSPS events, one of the CCAs impacted by this event, Pioneer Community Energy (“Pioneer”) knew to access its secure portal for information. Pioneer had customer lists only. While the area on the map had been identified for shutoff, Pioneer received information for customers West of Interstate 80 with no addresses for customers East of Interstate 80. The event was then called off, but Pioneer received a list for individuals on the East of Interstate 80 – customers that had only been identified by the map but were not included on the affected customers list. This conflicting notification is problematic for CCAs trying to prudently manage generation activities and support the safety of their communities.

CalCCA also agrees with the Joint Local Governments on the need to consult with local governments on the placement of Community Resource Centers (“CRCs”).⁴³ The Joint Local Governments illustrate how the IOUs have been participating in negotiations to secure CRC locations far in advance of actual PSPS events, but unfortunately, some of these places are inadequate. The Joint Local Governments advocate for the Commission to direct the IOUs to work with local governments to identify facilities and locations best suited for CRCs.⁴⁴ Local governments would like better consultation on the placement of the CRCs to ensure the best service and access to the individuals needing CRC services. The Joint Local Governments recommend setting a standard for the number of CRCs based upon population, such as 1 per 5,000 residents.⁴⁵ CalCCA notes that the concept merits consideration. However, in rural areas, the populations may be so spread out that the number of CRCs may need to be increased due to distance and accessibility.

⁴³ Joint Local Governments Proposal at 32.

⁴⁴ Pioneer conversation with partner local governments.

⁴⁵ *See id.* at 33.

Both PG&E and SCE note that they conduct power flow studies prior to PSPS events. PG&E also states that it provides the information to CAISO for power flow studies and that it also contacts transmission level customers.⁴⁶ This information should be shared with CCAs and other load-serving entities (“LSEs”) to understand the potential impacts to their customers and operations. CMUA supports the IOUs providing advance notice to LSEs and challenges PG&E’s allegation that it cannot share load data and circuit information with market competitors.⁴⁷ CMUA points out that PG&E has not made its case for labeling municipalities and CCAs being market competitors.⁴⁸ CCAs are not market competitors for transmission and distribution service, and actually rely on IOUs to deliver generation service to unbundled customers. The IOUs have an obligation to share relevant transmission and distribution service information that impacts CCAs programs.

Also, CalCCA supports RCRC’s recommendation⁴⁹ that IOUs should notify adjacent jurisdictions to account for possible movement of individuals from one area to another in search of power and refuge. RCRC also encourages the Commission seek a declaration from the Governor that PSPS events are an emergency due to their potential significant impacts.⁵⁰ CalCCA supports the use of emergency powers to support communities facing multi-day power outages.

In addition to more accurate notifications, the IOUs—as the Joint Local Governments comment—should provide greater specificity and granularity in their definitions and designations of impacted areas. CalCCA would like to see historical load information for each circuit that will be deenergized, based upon the specific calendar days for the PSPS event, including: (1) estimated load for each circuit to be deenergized during the PSPS period, and (2) load forecast for medical baseline and critical facilities customers to help discern backup generation needs during a PSPS event. The Joint Communications Parties would like the IOUs to provide geographic information.⁵¹ EPUC requests communications to address the likelihood that a line would be de-energized, and requests that this information be posted to the secure portal. CalCCA agrees that knowing the likelihood of a line outage is useful information.

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⁴⁶ See PG&E’s Opening Comments on Phase Ruling at 7.

⁴⁷ See CMUA Comments at 4.

⁴⁸ See *id.* at 4.

⁴⁹ See RCRC Comments at 8.

⁵⁰ See *id.* at 9.

⁵¹ See Joint Communications Parties Comments at 5.

IV. CONCLUSION

CalCCA appreciates the opportunity to provide comments on the proposals to the Commission.

Respectfully Submitted,

/s/ Irene Moosen

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