

**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)

**OPENING COMMENTS OF THE
CALIFORNIA COMMUNITY CHOICE ASSOCIATION
ON PROPOSED ADDITIONAL DE-ENERGIZATION GUIDELINES**

David Pepper
BRAUN BLAISING SMITH WYNNE P.C.
555 Capitol Mall, Suite 570
Sacramento, CA 95814
Tel: (916) 326-5812
E-mail: peffer@braunlegal.com

On behalf of:
The California Community Choice Association

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”) and the January 30, 2020 *Administrative Law Judge’s Ruling Requesting Comments* (the “ALJ Ruling”), the California Community Choice Association (“CalCCA”) hereby submits the following opening comments on the Energy Division’s January 30, 2020 *Proposed Additional and Modified De-Energization Guidelines In Addition To Appendix A Of the De-Energization Phase 1 Decision (D.19-05-042) and Resolution ERSB-8* (the “Staff Proposal”). CalCCA is the trade association that represents California’s Community Choice Aggregators (“CCAs”), and CalCCA is submitting these comments as the representative of its member CCAs.

CalCCA shares the Commission’s commitment to public safety and minimizing the significant impacts of Public Safety Shutoff (“PSPS”) events. CalCCA appreciates the Commission’s commitment to the De-Energization proceeding and the significant effort that Energy Division staff has put forth to continually improve the PSPS program and to ensure that the needs, issues and concerns of local governments, vulnerable communities and other stakeholders are given serious consideration. In these comments, CalCCA expresses its strong support for many elements of the Staff Proposal and offers a number of recommended amendments and clarifications to further strengthen the Staff Proposal.

I. COMMENTS ON THE STAFF PROPOSAL’S RECOMMENDED CHANGES

A. Working Groups And Advisory Boards

i. Proposed Modifications to Working Groups Proposal

The Staff Proposal would require that each investor owned utility (“IOU”), with the participation of small multi-jurisdictional utilities (“SMJUs”), CCAs, and communications providers, convene monthly regionalized working groups with tribal and local government entities, public safety partners, and representatives of access and functional needs (“AFN”) and vulnerable communities.¹ CalCCA strongly supports this proposal, but recommends several modifications to strengthen the proposal and ensure that the working groups are successfully implemented.

First, CalCCA recommends that the Commission provide more detailed guidelines and goals for the working groups. Having more detailed guidelines and goals going in to the working group process will reduce the need for negotiation between the IOUs and working group participants and result in a more focused, streamlined process that will be better able to produce meaningful results before next fire season. Working group goals specified by the Commission should include:

- *Regional Response Planning:*
 - Identifying the data needed by regional agencies and public safety partners for PSPS response.
 - Coordinating on information sharing, release, and public notification.
 - Development of the materials and information to be included in the IOUs’ PSPS web portals for the region’s public safety partners and local government agencies² to use for planning and response.
 - Developing and sharing comprehensive lists and maps of critical facilities and infrastructure.
- *Regional Communication Planning:*
 - Developing methodologies, identifying information sources, and establishing partnerships with local governments and community based organizations to identify unenrolled but Medical Baseline (“MB”) eligible customers and AFN individuals and communities.

¹ Staff Proposal at 1.

² All references to “local governments” or “local government agencies” in these comments include city, county, and tribal government agencies unless otherwise noted.

- Regional assessment of PSPS-related needs of MB-eligible, MB-enrolled, and AFN individuals and communities and development of associated action plan.
- Collaborative development of a plan for providing notification to the region’s customers, MB and AFN customers, critical facilities and infrastructure operators, and life support customers.
- Identification and development of additional tools and strategies needed for effective communication.
- *Regional Mitigation Planning*
 - Identifying circuit switching opportunities based upon community priorities and collaborating with CCAs regarding additional areas of opportunity identified in the CCA service area.
 - Identifying IOU-funded temporary generation resources and developing deployment plans based on community priorities and with community consent and approval.
 - Collaborating with CCAs regarding CCA generation assets for PSPS mitigation.
- *Regional Resiliency Planning:*
 - IOU update of grid hardening and sectionalizing plans and activities in the area.
 - Identifying microgrid deployment options in collaboration with local governments and the CCAs in those areas.
 - Identifying, supporting and cooperating fully with local governments and CCAs on resiliency plans, strategies, and investments

The Commission should clarify that these are *minimum goals* for the working groups, and the working groups should have the discretion to address additional issues and provide additional recommendations.

Second, because these working group meetings are intended to validate whether the IOUs have implemented lessons learned from prior PSPS events,³ prior to each meeting the IOUs should be required to compile a list of the lessons learned and provide this list along with the working group

³ Staff Proposal at 1.

meeting notices. Where the IOUs have taken actions to address the lessons learned, both the specific lesson learned and the specific remedial action taken should be described in detail.

Third, the Commission should require that the IOUs include the items below in their monthly working group reports:

- Provide the report in an electronic word processing format (e.g., Word) in order to provide more comprehensive narrative details of the corrective actions.
- Expand the level of detail on each of the corrective actions, including detailed descriptions of processes and procedures developed, specific milestones for corrective actions, timelines for achieving the milestones, and explanations for delayed or non-actions toward the milestones.⁴
- Report on all discussions and agreements reached with regard to PSPS preparation, operations, and corrective actions.
- Provide a detailed summary of all information provided to the working group at the meeting.

Fourth, the Commission should clarify the roles and requirements of the various entities involved in the working groups. As worded, it appears that SMJUs, CCAs, and Communications Providers are intended to have a role in “convening” the working groups, while local government entities, public safety partners, and AFN/vulnerable community representatives must be invited to “participate” in the working groups.⁵ CalCCA believes that it is essential that the IOUs not be the only entities with their “hands on the wheel” in determining the site, format, agenda, and participant list for the working groups. As such, the proposal should be amended to clarify that the role of the “convening” parties is to develop and agree upon, *by consensus*:

- A list of their region’s public safety partners, AFN representatives, and vulnerable communities’ representatives to be invited to join the working groups.
- Working group meeting site and date/time.
- Working group meeting format, agenda, goals, and intended work product.

In addition, CalCCA *strongly* recommends that local government agencies be included among the “convening” parties, and be given a full and equal role in developing and implementing the working

⁴ Assigned Commissioner’s Ruling Regarding Pacific Gas and Electric Company’s Post-Public Safety Power Shutoff Corrective Action Reporting, R.18-12-005, at 4-6 (Requests to be expanded to all IOUs).

⁵ Staff Proposal at 1.

groups, as local governments are the entities with the primary responsibility for emergency response during PSPS events, while their operational CCAs hold the responsibility for investigating and developing prevention measures.

Fifth, the Commission should amend the proposal to ensure that *all* working group participants have the opportunity to submit comments or reports to the Commission. The Staff Proposal, as currently worded, instructs the IOUs to submit post-meeting reports to the Commission, but does not specifically include the opportunity for other parties to either submit their own reports or submit comments on the IOUs' reports.⁶ The Staff Proposal states that one of the purposes of the working groups is to provide a mechanism for the commission to validate whether the IOUs have implemented lessons learned from previous PSPS events.⁷ For the working groups to fulfill this purpose, it is essential that the Commission receive accurate, balanced reporting on the working groups that provides feedback from all participants, not just the IOUs. As such, CalCCA recommends that all working group members be given the opportunity to submit comments on IOU post-working group reports to the Safety and Enforcement Division (“SED”) and Energy Division within 10 days of the service of the post-working group report, and that these comments be incorporated into the record for the De-Energization Rulemaking.

Sixth, in the interest of openness and transparency, the IOUs should be required to submit their post-working group reports to the Commission; file and serve their reports in R.18-12-005, R.18-10-007, R.19-09-009, and any successor proceeding(s); and provide copies of the reports to all working group participants (including those not on the service lists). Both the IOU post-meeting reports and any party comments on the reports should be part of the formal record of the De-Energization Rulemaking and any successor proceeding.

Seventh, the Commission should more specifically define the “regions” the separate working groups are to cover. The Commission should ensure that the regions covered by each working group are small enough to: 1) allow full and active participation in the working group by all local government agencies, all CCAs that operate within the region, and the selected community representatives; and 2) allow the group to focus on each region's specific geography, climate, demographics, and needs. CalCCA recommends that regions be defined as the pre-existing operational areas used in emergency management and response planning. However, this definition

⁶ *Id.*

⁷ *Id.*

should be modified to require smaller regions if existing regions impose unreasonable burdens on rural community participation.

Eighth, the proposal should clarify that the working group meetings must be physical, in-person meetings, not just internet meetings or teleconferences. However, attendance by video webconference should be allowed to reduce the burden on working group members in rural, more spread out areas, and to accommodate working group members' needs. These meetings should occur in locations central to the region for greater convenience to the local government, tribes, CCAs and other participants.

Ninth, recognizing the urgent need for progress before the start of next fire season, the Commission should establish mandatory timelines for the implementation of the working group proposal. Specifically, CalCCA recommends the following deadlines associated with the working group and post-meeting reports:

- *Within 10 days of the Final Decision* – initiate working group planning with all SMJUs, CCAs, communications providers, and local government agencies in the working group region.
- *Within 30 days of the Final Decision* – finalize working group planning, including selecting a working group chair by majority vote, and developing a consensus list of public safety partners, AFN representatives, and vulnerable communities' representatives to be included in the working group.
- *Within 45 days of the Final Decision* – hold first working group.
- *10 days after each working group meeting* – IOUs submit post-meeting reports to Commission, serve to De-Energization Rulemaking service list, email copies to all workshop participants.
- *20 days after each meeting* – working group participants may submit comments on the IOUs' post-meeting reports.

CalCCA would also support date-specific deadlines that are not tied to the issuance of the Final Decision if such deadlines would accelerate implementation of the working groups.

ii. *Proposed Modifications to Advisory Boards Proposal*

Like the working groups proposal, the advisory boards proposal would benefit greatly from the addition of more specific goals and targets, requirements, definitions, and timelines. CalCCA has several recommendations to strengthen this important proposal.

First, CalCCA notes that the Staff Proposal as currently written does not require the inclusion of CCAs in each IOUs advisory board.⁸ This is a significant oversight. CCAs are local government agencies⁹ with close ties to their communities and significant technical knowledge and familiarity with complexities of the State’s energy regulation landscape. Even more importantly, CCAs are the entities responsible for the development and deployment of generation resiliency resources and programs within their service areas.¹⁰ CalCCA recommends that the advisory boards proposal be amended to require that IOUs include CCAs within their service territories in their PSPS advisory boards.

Second, in the interest of efficient implementation, adequate representation of different entities and groups, and avoiding conflicts over advisory board size and composition, the Commission should set the advisory board size at fifteen (15) members, and reserve a set number seats on the board for representatives of each interested group based on the group’s ability to contribute to the board and strength of the group’s interest in PSPS and resiliency matters. Regarding the business community representative, CalCCA notes that large businesses, particularly those in the energy industry and related fields, have ample resources and connections to participate in Commission proceedings and to directly share their input and opinions with IOU management and executives. To ensure that the advisory board includes voices from the business community that are otherwise unrepresented, the business community representative should represent the interest of small businesses in communities that have been disproportionately impacted by PSPS events, and

⁸ *Id.*

⁹ CCAs are either divisions of city or county governments, or Joint Powers Authorities that are formed, controlled, and exercise power delegated to them by their member cities and/or counties. See Cal. Govt. Code Section 6500 (JPAs are included in the definition of “public agency”); 6252 (as public agencies that are not state agencies, JPAs are “local agencies”); 434.5 (“local government agency means a county, city, whether general law or chartered, city and county, town, municipal corporation, school district or other district, political subdivision, or any board, commission, or agency thereof, or other local agency). See also Assembly Bill 1773, wherein the Legislature amended Pub. Util. Code Section 2830 to expand the definition of “local governments” eligible for RES-BCT to include Joint Power Authorities.

¹⁰ Pub. Util. Code Section 366.2(a)(5) (“A community choice aggregator shall be solely responsible for all generation procurement activities on behalf of the community choice aggregator’s customers, except where other generation procurement arrangements are expressly authorized by statute.”)

that provide services to or employ residents of Environmental and Social Justice Communities, as defined in the Commission’s Environmental Justice / Social Justice Action Plan.¹¹

Third, the Commission should expand the functions of each IOU’s advisory board and the issues within each advisory board’s purview. The Staff Proposal currently states that the advisory boards are to advise the IOUs on best practices for: wildfire issues and safety; community preparedness; regional coordination; and the use of emerging technologies.¹² It is not sufficient for the advisory boards to provide the IOUs with general, abstract suggestions regarding best practices. To actually contribute to the improvement of IOU PSPS practices, the *function* of the advisory boards must be expanded to include: identifying existing best practices and developing new best practices where necessary; assessing the IOU’s current and practices and investments related to wildfire safety, PSPS safety, PSPS mitigation, resiliency resources and strategies, and system hardening; and providing the IOU with recommendations to improve its current and planned practices and investments to bring them into alignment with identified best practices. In addition, the *scope* of the issues within the advisory boards’ purview should be expanded to include the list of issues identified below, as well as any other issue that the advisory board determines to be relevant.

Fourth, the Commission should clearly define the respective roles of the advisory boards and the working groups, and establish mechanisms for coordination and information sharing between each IOUs advisory board and its regional working groups. CalCCA recommends that each IOU have one advisory board and multiple regional working groups. Each advisory board, working in coordination with SED and the Energy Division, should be required to develop mechanisms and protocols for two-way coordination and information sharing with the regional working groups. In addition, all advisory board reports should be shared with all regional working groups, and to the extent possible, regional working groups should be invited to participate in the development of advisory board reports and send representatives to advisory board meetings.

Fifth, the Commission should explicitly recognize that the purpose of an advisory board is to provide the IOU with an *outside perspective* that represents the needs of – and provides insights from – groups that the IOUs may not otherwise receive advice from. In order to provide any actual value, the advisory boards must be composed of *independent voices* that represent interests and

¹¹ Available at: https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/Infrastructure/DC/Env%20and%20Social%20Justice%20ActionPlan_%202019-02-21.docx.pdf

¹² Staff Proposal at 2.

perspectives outside the IOUs. An advisory board selected by an IOU will at best be redundant, as it will be composed of individuals who already have relationships and channels of communication to provide the IOUs with their thoughts and advice. At worst, an IOU-selected advisory board will serve no function other than to parrot the IOU's own interests and opinions. As such, the IOUs should not have any role in selecting or defining the membership of their advisory boards, and advisory board membership should instead be initially determined by Commission staff, and subsequently selected by the advisory boards themselves.

Sixth, in order to be able to provide the IOUs with useful and informed advice, the advisory boards must have broad access to information on the IOU's PSPS-related and resiliency-related planning, operations, investments, and expenditures. The advisory boards cannot advise the IOUs on best practices and needed improvements without a thorough understanding of the IOUs current and planned PSPS-related operations, programs, and investments.

Seventh, the advisory boards should be required to conduct monthly, in-person meetings, and produce regular advisory reports. The advisory reports should be provided to the IOU and Commission staff, and filed/served in the De-Energization Rulemaking and any successor proceedings. To avoid any undue burden on board members, the board may adopt policies allowing some members to attend via video webconference.

In order to meet these goals, CalCCA recommends that the Commission adopt the following requirements:

- SED, working in conjunction with the Energy Division, shall establish one PSPS advisory board for each IOU.
- Each IOU's advisory board shall consist of 15 members. All members must reside or do significant business in the IOU's service territory, or represent groups or entities in the IOU's service territory. Initially, the 15 members shall be selected by SED, in coordination with the Energy Division, and with input by stakeholders. Replacement members of the advisory boards shall be selected by the advisory boards themselves, subject to review and approval by SED. Each IOU's advisory board members shall include:
 - Five (5) local government officials representing the interests of local governments.

- Two (2) tribal government officials representing the interests of tribal governments.
- Two (2) representatives of CCA programs (including prospective CCA programs) located within the IOU's distribution service territory.
- One (1) representative of a university department, think tank, or other academic organization with expertise in emerging energy technologies, particularly those that can be used to enhance resiliency.
- One (1) representative of a university department, think tank, or other academic organization with expertise in grid operations, emergency response planning, community preparedness, and public safety issues.
- One (1) business community representative that represents the interests of small businesses in communities that have been disproportionately impacted by PSPS events, and that provide services to or employ residents of Environmental and Social Justice Communities, as defined in the Commission's Environmental Justice / Social Justice Action Plan.
- Three (3) representatives from nonprofit, public interest organizations that represent ratepayer, environmental, and vulnerable customer/AFN interests.
- Each IOU's advisory board shall serve the following functions:
 - Advising the IOU on existing best practices related to wildfire safety, PSPS safety, PSPS mitigation, resiliency resources and strategies, and system hardening; or developing recommended best practices where necessary.
 - Reviewing and assessing the IOU's current practices related to wildfire safety, PSPS safety, PSPS mitigation, resiliency resources and strategies, and system hardening, and providing specific recommendations for improving these practices.
 - Providing the IOU with recommendations regarding the best investments and strategies for reducing PSPS event size, frequency, and impact, and providing recommendations for improving these investments and strategies in a manner that best balances: implementation time; effectiveness in reducing PSPS frequency, duration, and/or impact; cost; environmental impacts; improving

power restoration times; and impacts on disadvantaged, vulnerable, and AFN communities and individuals.

- Review emerging technologies and actions and provide recommendations for the use of such technologies to reduce the size, frequency, and impact of PSPS events. Initial technologies reviewed should include the use of smart meters for islanding, zero-emissions or zero-emissions sources of backup power and resiliency, and any other technology or technologies selected for review by the advisory board.
- After each PSPS event, independently review and report on: 1) the event's costs, harms, and impacts; and 2) the IOU's compliance with advisory board recommendations and identified best practices during the event. This report shall be submitted in the form of comments on the IOUs' post-event report.
- Each advisory board, working in coordination with SED and the Energy Division, shall develop mechanisms and protocols for two-way coordination and information sharing between the advisory board and the regional working groups. All advisory board reports shall be shared with all members of the IOUs' regional working groups. To the extent possible, the advisory board shall invite regional working groups to participate in the development of advisory board reports and recommendations. Each IOU's advisory board shall invite representatives of each of the IOU's regional working groups to its meetings. To allow the working groups to consider reports and proposals developed by the advisory board in their meetings, advisory board meetings and local working group meetings shall be staggered, with advisory board meetings held at the beginning of each month and working group meetings held in the middle of each month.
- Each advisory board meeting shall, at a minimum, be attended by a local grid operation expert from the IOU, a member of the IOU's team responsible for calling PSPS events, and a member of the IOU's team responsible for emergency planning and PSPS response/mitigation. The advisory board shall have the authority to request attendance by other IOU staff as it deems necessary.
- Each IOU's advisory board shall meet on a monthly basis at a date, time, and location determined by the advisory board. Each advisory board meeting shall consist of: 1) a

presentation by the IOU on topics and questions provided by the advisory board and any other topics that the IOU wishes to address; 2) an open discussion with IOU representatives; and 3) a closed-door discussion without IOU participation or attendance. Commission staff shall be invited to all parts of the advisory board meetings.

- Each IOU’s advisory board shall produce, at a minimum, quarterly advisory reports, and may produce separate special reports as needed. These reports are to be provided to the IOUs, the Energy Division, and SED, and the reports should be filed and served in the De-Energization Rulemaking and any successor proceedings. Public and Confidential versions of the reports may be filed following the Commission’s established confidentiality guidelines if the reports contain confidential information. However, full unredacted reports must be provided to SED and the Energy Division and filed under seal.
- Each IOU shall fully cooperate with its advisory board. Each advisory board shall have broad authority to request PSPS, wildfire safety, and resiliency information from its IOU. Each advisory board shall be allowed to access and inspect facilities, review documents, and observe utility operations, at its discretion. Any disputes over the advisory board’s access to information shall be referred to and resolved by SED.
- Each advisory board shall have the authority to issue data requests, and these data requests will have the same weight and enforceability as data requests issued by SED.
- No later than 30 days after the adoption of the Final Decision, SED and the Energy Division shall announce their nominations for each IOU’s advisory board.
- Each IOU’s advisory board shall have its first meeting no later than 60 days after the adoption of the final decision.

B. De-Energization Exercises

CalCCA supports the Staff Proposal’s requirement that the IOUs collaborate with the Commission, CalFire, CalOES, and local emergency response officials to plan annual de-energization exercises in their territories for the highest historical and forecasted risk PSPS events.¹³ However, CalCCA strongly recommends that the proposal be amended to require that the IOUs

¹³ Staff Proposal at 2.

allow all interested CCAs within their service territories to observe and participate in all exercises and related activities. CCAs are public safety partners, local government agencies, and generation service providers that rely on the IOUs to deliver power to their customers. As discussed above, in their service areas CCAs are the primary entities responsible for planning, procuring, and implementing resiliency generation resources and programs. As such, the CCAs are positioned to offer significant contributions to these exercises, and have a direct interest in monitoring and participating in the exercises. CalCCA also requests that the Commission require that the IOUs allow their advisory boards and representatives from regional working groups to observe the exercises and access all related materials.

CalCCA cautions that these events would likely incur costs associated with resource commitment, staff time, and coordination for participating local government agencies. CalCCA recommends that the Commission discuss the logistics and resource commitment that local governments may make to ensure that these exercises will achieve the intended goals and objectives. Further, because these exercises are intended to simulate worst-case scenarios that would likely require a regional response effort, the Commission may also consider coordinating with CalOES to develop response plans and prevention exercises, and possible credit to local governments that participate for disaster training exercise requirements

In order to provide adequate time to allow the lessons learned from the exercises to be incorporated into planning for the 2020 wildfire season, CalCCA recommends that the Commission require that the IOUs complete table-top exercises for each of their operational areas (or other geographic subdivisions such as working group regions) no later than May 31, 2020, including but not limited to notification to participants, generation of information needed in a PSPS event, placement of the information on the portal, and a discussion of resource deployment from all participants, identification of any special requirements or local needs, and an evaluation of areas for improvement.

C. Who Should Receive Notice, When Should Notice Occur, and How Should Notice Occur?

CalCCA supports the Staff Proposal's recommended notification requirements,¹⁴ but believes that the notification process would be significantly improved by the adoption of the following five recommendations. First, while CalCCA strongly supports the requirement that the IOUs develop

¹⁴ *Id.* at 2-4.

communication and notification plans with local authorities,¹⁵ this requirement is lacking in detail and needs to be fleshed out in order to ensure that it is effectively implemented. In addition, the requirement should be expanded to specifically include CCAs. CalCCA recommends that the Commission expand the communication and notification plan requirement as follows:

- Each IOU should be required to develop both an overall communication and notification plan for the entirety of its service territory and separate, region-specific communication and notification plans for each working group region (identified above).
- The regional communication and notification plan must be jointly developed by the IOU, all local government agencies in the region, and all CCAs that serve customers in the region. The plan must be agreed upon by all local government agencies involved with the PSPS events and CCAs.
- The IOU shall not impose any non-disclosure agreement (“NDA”) or similar requirements as part of the plan, nor shall the IOU require execution of an NDA in order to access any information that is covered by the plan.
- Each plan shall establish specific detailed mechanisms for notifying and communicating with local government agencies, public safety partners, CCAs, critical facilities operators, and affected customers under both normal conditions and in the event of communication disruptions.
- Each plan shall provide for the establishment of a secure web data portal for sharing information with local government agencies and CCAs. This portal shall provide:
 - On a real-time basis, all information needed to respond to and mitigate the impacts, costs, and harms caused by all planned, ongoing, or recently concluded PSPS outage.
 - All information needed for local and tribal government agencies and CCAs to develop PSPS emergency response and public safety strategies, PSPS mitigation strategies, and resiliency strategies, projects, and investments. This information shall be updated regularly.
 - All information shall be made available in both map and tabular formats.

¹⁵ *Id.* at 2-3.

- Each IOU shall implement its portal, fully populate its portal with planning information, and have its portal ready to provide real-time PSPS outage information no later than March 31, 2020.

The importance of adopting thorough, actionable, and region-specific notification and communication plans is plainly demonstrated by the communications failures that occurred during PG&E's October 2019 PSPS events. During the Pacific Gas and Electric Company's ("PG&E") consolidated PSPS outages from October 23 to November 1, 2019, more than 28,000 customers did not receive any advance notification before losing power.¹⁶ The plans must include measures to ensure that such failures do not occur again.

The Staff Proposal discusses false negatives and false positives with an emphasis upon immediate correction and explanation for how the incorrect communication occurred. By asking for an explanation of the causes of the previous communication errors, perhaps the IOUs could prevent these events in the future. CalCCA recommends the Commission ask for this analysis and the remedies taken by the IOUs to prevent these communication errors in the future.

Second, CalCCA strongly supports the recommendation that the IOUs create plans to leverage public radio. However, leveraging radio, especially in more rural communities, may require mitigation measures and resiliency resources to ensure those radio stations stay on the air.¹⁷ CalCCA recommends that the Commission amend this requirement to instruct the IOUs to identify any radio broadcast facilities identified as "emergency alert system" service providers that require backup power to remain operational during PSPS events, and instruct the IOUs to provide those facilities with all necessary backup generation.

Third, CalCCA supports requiring that the IOUs ensure that they have adequate bandwidth capacity to provide the public with PSPS information even in the event of significantly increased web traffic.¹⁸ CalCCA recommends that this requirement be extended to further require that the IOUs have adequate bandwidth and technical resources in place to ensure that their PSPS web portals for local government agencies and CCAs remain operational and are updated in real time.

¹⁶ See, *Comments of the California Community Choice Association on Pacific Gas and Electric Company's Public Safety Power Shutoff Reports for the October 23, 2019 and October 26 and 29, 2019 Consolidated Events*, submitted December 3, 2019, at 12.

¹⁷ *Id.* at 11.

¹⁸

Fourth, CalCCA supports the recommendation that IOUs provide communications carriers with the meter and circuit IDs to be de-energized and re-energized to ensure communications carriers have the information they need to maintain the communication lines. CalCCA recommends that all relevant local government agencies and CCAs also be provided this information. During emergency situations like PSPS events, maintaining functional communication networks is critical for public safety. Especially in isolated or rural areas, any disruption of a community's or individual's ability to receive outage notices and updates from the IOU, contact emergency responders, or receive evacuation or other information from the emergency alert system during a PSPS event could result in fatalities. Providing local government agencies and CCAs with information to identify potential communication disruptions and locate potential communication "dead zones" can help them prioritize resiliency resources and mitigation measures. In addition, this information is extremely important to emergency planners and first responders, who need to be aware of areas where residents may not be able to reach out for needed emergency assistance.

Fifth, the Commission should require that the IOUs use precise and accurate terminology in all public notifications, communications, and reporting related to PSPS events.. CalCCA is particularly troubled by the IOUs' use of the term "customers" instead of "accounts" or "service points" when referring to the size of PSPS outages. In normal usage, the term "customers" refers to individual people, not households, facilities, or accounts. By referring to accounts as customers, the IOUs have created a false and misleading impression that their PSPS events are far smaller than they actually are. Because, in most cases, more than one person lives or works at each residence or facility served by an "account," a PSPS outage that affects 800,000 accounts would likely impact millions of individuals. To avoid this confusion, the Commission should add the following requirements:

- In all PSPS-related notices, reports, and other communications the IOUs shall use clear and precise terms.
- The SED and Energy Division shall monitor IOUs' PSPS notices, communications, and reports for the use of ambiguous or misleading terms, and shall propose additions to the "definitions" section of these rules to promote clear and accurate PSPS communication.
- In all PSPS-related notices, reports, and communications, the IOUs shall use the term "accounts" instead of "customers" in describing the expected or actual size and

impact of a PSPS event. In all such communications, the IOUs shall provide both the number of “accounts” impacted and the estimated number of “individuals” impacted.

D. Community Resource Centers

CalCCA has a number of concerns regarding the Staff Proposal’s Community Resource Centers (“CRC”) proposal, and recommends that the CRC proposal be modified to more accurately reflect the authority and responsibilities of local governments and the IOUs in responding to emergencies and establishing CRCs. As currently worded, the CRC proposal places the primary responsibility for the planning and provision on CRCs, and only requires that the IOUs “collaborat[e] with relevant stakeholders” and develop their plans “with consultation from the regional local government working groups and the wildfire advisory boards.”¹⁹

This approach is problematic for two reasons. First, making the IOUs primarily responsible for CRC planning is incompatible with local governments’ emergency planning and response roles and authority. Second, the proposal is inefficient. Compared to the IOUs, local governments generally have far more experience and expertise in local-level emergency planning and response. Local governments are also far better equipped than IOUs to identify the best locations for CRCs to meet the special needs of their communities, which are varied and diverse due to location, geography, climate, socio-economic status, culture, and other demographic factors.

To remedy these problems, the proposal should be modified to require that the IOUs defer to local governments’ CRC-related decisions unless the local government explicitly elects not to exercise this function and to allow the IOU to take responsibility for CRC planning. CRC-related decisions include the number of CRCs, the location of CRCs, CRC operations, and CRC resource needs. In communities where the local government elects to retain its CRC planning role, the IOU should be required to support the local government by:

- Providing the local government with all information it requires to site and prepare CRCs in areas most likely to experience PSPS outages;
- And providing the local government with CRC funding, staff resources, and material support, including backup generation or permanent resiliency resources.

CalCCA further requests that in implementing and further refining the requirement that “customers should not be required to drive more than 30 minutes to a CRC and CRCs shall be

¹⁹ Staff Proposal at 4.

operable 24 hours a day during an active de-energization event (provided there is no curfew in effect),”²⁰ the Commission be mindful of the fact that this 30-minute requirement has extremely different implications between communities in the urban/suburban environments and communities in isolated rural environments. In many towns and cities, a 30-minute drive with traffic and impacted traffic lights could be 2 miles. In contrast, for an isolated rural community located in rough terrain like Foresthill (located in the Sierra Nevada mountains), it means a long and treacherous 20-mile drive down a two-lane, winding road from a community that is not served by public transportation.

E. Restoration of Power Service Upon Conclusion of PSPS Event

CalCCA supports the Staff Proposal’s recommended power restoration requirements. It is reasonable to require that the IOUs restore power as soon as possible after the conclusion of the conditions that led to the PSPS event. It is also reasonable to adopt a firm deadline requiring that the IOUs restore all power within 24-hours of the conclusion of PSPS conditions.

In order to ensure that the Commission has adequate information to enforce this requirement, the IOUs should be required to provide detailed information in their post-event reports listing all service points that took longer than 24-hours to re-energize. The Commission should adopt a robust enforcement mechanism associated with the 24-hour deadline, and should impose penalties for: 1) any failure to report re-energizations that took longer than 24 hours; and 2) any violations of the 24-hour time limit. The Commission should also require that any IOU claiming that it was unable to re-energize within the 24-hour time limit due to “unintended circumstances” thoroughly document the exact “unintended circumstances” in a signed declaration attached to its post-event report, and the Commission should interpedently assess the reasonableness and accuracy of any such claim.

F. Transportation Resilience

CalCCA supports the proposal to develop a transportation resiliency taskforce and concurs that prioritizing “providing necessary resources to transportation infrastructure that is geographically located in areas most likely to experience de-energization events” is the best approach.²¹ However, CalCCA requests that the Commission amend this directive to require that the provision of resources to transportation infrastructure be prioritized in accordance with the recommendations of the local, state, federal, and tribal governments along with other stakeholders. In addition, the directive should be amended to clarify that all decisions, planning, and provision of generation resources to

²⁰ Staff Proposal at 5.

²¹ Staff Proposal at 5.

transportation infrastructure in CCA service areas be done collaboratively between the distribution/transmission IOU and the CCA.

CalCCA further requests that the proposal be expanded to require the inclusion of CCAs in all transportation resiliency taskforces. CCA inclusion in these discussions is appropriate given CCAs' primary role in planning and implementing generation resiliency resources and strategies in their service territories, and the fact that transportation infrastructure located in CCAs' service areas may be ideal targets for CCA resiliency resource deployment.

CalCCA supports the requirement that the IOUs “develop and execute a plan to ensure that mobile and deployable electric vehicle fast charging is available and priority access is granted to customers, including those serving AFN populations, potentially impacted by de-energization events, especially along major transportation corridors.”²² Again, CalCCA requests that this plan be developed in collaboration with the CCAs and local governments, and implemented with the full consent of CCAs and local governments. Many CCAs are planning or have developed both electric vehicle programs (including the strategic placement of charging stations) and resiliency generation programs and resources. These programs can substantially contribute to meeting the goals of the EV plan requirement.

In addition, CalCCA suggests that the IOUs also incorporate information from DrivetheArc.com which has charging stations located along Interstate 80 which transects Tier 2 and Tier 3 fire areas and many locations in the Bay Area.²³

G. Medical Baseline and Access and Functional Needs Populations

i. Medical Baseline Needs Assessment and Plan

CalCCA supports the Staff Proposal's requirement that the IOUs work in collaboration with public safety partners, local governments, and AFN customer advocates to conduct a needs assessment/plan for current and qualifying but unenrolled MB customers. CalCCA agrees that May 1, 2020 is a reasonable deadline for this assessment/plan, and agrees that the assessment/plan should include identifying current and unsubscribed medical baseline customers, identifying what if any assistance is needed for these customers during de-energization events, and developing an

²² Staff Proposal at 6.

²³ Available at: <https://drivethearc.com/>

evacuation plan for these customers that specifies transportation and health care resources that can be provided to them.²⁴ CalCCA has two recommendations for further improving this requirement.

First, CalCCA recommends that the Commission adopt aggressive mandatory targets for the identification and enrollment of all unenrolled MB-eligible customers, and closely monitor IOU progress towards those targets. The targets should include:

- By March 30, 2020 – each IOU must provide the Commission with an accurate and data-supported estimate of unenrolled MB eligible customers in its service territory.
- By April 30, 2020 – each IOU must provide a full accounting of its agreements, partnerships, and plans for identifying AFN individuals within its service territory.
- By May 31, 2020 – each IOU must complete its initial database of AFN individuals and share this database with the Commission, local government agencies, and CCAs.
- Prior to the start of the 2020 fire season, no later than May 30, 2020 – each IOU must demonstrate that it has enrolled 70% of its currently unenrolled MB-eligible customers.
- Prior to the start of the 2021 fire season, no later than April 1, 2021 – each IOU must demonstrate that it has enrolled 90% of its currently unenrolled MB-eligible customers.

Second, CalCCA requests that the proposal be amended to specifically require the inclusion of CCAs in the development of the assessment/plan. CCAs provide generation service to their MB and AFN customers, and have an interest in: 1) identifying unenrolled MB-eligible customers within their service areas and ensuring that these customers are enrolled in in the MB program; and 2) developing resiliency programs and resources to protect their MB customers.

ii. Identification of Access and Functional Needs Populations

CalCCA believes that there is an immediate and pressing need for the IOUs to identify all access and functional needs (“AFN”) individuals and populations in their service territories and take comprehensive steps to protect them from harm during PSPS events. CalCCA supports the proposal that the IOUs be required to work with local government partners, AFN advocates, and AFN service providers to obtain the data needed to identify AFN individuals and populations.²⁵ Identifying and

²⁴ Staff Proposal at 6-7.

²⁵ Staff Proposal at 7.

protecting access and functional needs populations is one of the most critical tasks facing the IOUs and the Commission. As the Commission and numerous parties have noted, Medical Baseline is a rate program, not a comprehensive roster of vulnerable individuals, and as such is a poor proxy for the population of individuals who are at a significantly increased risk of harm from PSPS outages. Given the importance of identifying and protecting AFN individuals, CalCCA recommends that the Commission adopt several additional modifications to the proposal.

First, the proposal should be amended to require that the IOUs include CCAs in all aspects of the development of AFN lists, that CCAs have full access to AFN lists for their service territories. This information will allow CCAs to include information about AFN populations in developing programs for vulnerable customers and targeting resiliency projects and resources, and will allow CCAs to better assist their member agencies in PSPS planning and immediate PSPS response efforts.

Second, the proposal should be amended to include deadlines and mandatory targets. The IOUs should be required to have complete lists of AFN individuals and populations for their service territories no later than May 31, 2020, and should be required to comprehensively update their lists at least twice yearly – On January 15 and May 31 of each year.

Third, the Commission should clarify that the definition of AFN includes all individuals at a significantly increased risk of harm during a PSPS event. In its September 17, 2019 Phase 2 Proposal in this Rulemaking, CalCCA recommended that the Commission adopt separate requirements for identifying and providing notice and assistance to “increased risk individuals” who are not enrolled in the MB program.²⁶ Other organizations have argued in favor of similar categorizations. For instance, TURN has recommended that the Commission require that the IOUs track data on PSPS-related impacts on “medically vulnerable customers” a category that extends beyond customers eligible for medical baseline.²⁷ Clarifying that AFN includes all individuals at an increased risk due to PSPS events will eliminate the need for such additional categories and allow progress towards protecting these individuals.

²⁶ *California Community Choice Association Proposal In Response To Assigned Commissioner’s Phase 2 Scoping Memo and Ruling*, Filed September 17, 2019, at 10-11.

²⁷ *Opening Comments Of The Utility Reform Network On The Track 1 Commission Staff And Utility Proposal* (Filed January 30, 2020 in the Microgrids Rulemaking, R.19-09-009), at 7.

iii. Life Support Customers

In addition to the modifications recommended in the Staff Proposal, there is an urgent need for the Commission adopt rules mandating that the IOUs: 1) identify all individuals within their service territories that rely on electricity for life support (including MB enrolled individuals, MB-eligible but unenrolled individuals, and AFN individuals); 2) take all measures necessary to ensure that the life-support individual has been provided with, and has actually received notice of the de-energization before power is cut; and 3) take all measures necessary to protect these individuals, including preparing and funding evacuations, ensuring that they receive appropriate emergency medical care and resources prior to de-energization, and providing these individuals with appropriate backup generation.

The proposal should be amended to require that the IOUs separately track a “life support” designation in addition to MB and AFN. To identify life support individuals, the Commission should require that the IOUs: 1) contact all currently enrolled MB customers at least twice a year to determine whether they qualify for the life-support designation; 2) determine whether all new MB customers qualify as life-support customers as part of the initial enrollment process; and 3) include (and prioritize) the identification of life support customers in all efforts to identify AFN individuals within their service territories.

iv. Special Notification Requirements for MB, AFN, and Life Support

The proposal should be expanded to require that in providing notice to customers on the MB and AFN lists, the IOUs continue attempts to provide notice until the IOU receives confirmation that the customer has received the notice and is aware of the pending PSPS outage. For these customers, the IOUs should be required to exercise all available methods of providing notice, including non-automated phone calls and in-person visits.

H. Transparency

CalCCA supports requiring that the IOUs provide on their website “a thorough and detailed indication of the quantitative and qualitative factors it considered in calling, sustaining, or curtailing each de-energization event (including information regarding why the de-energization event was a last resort option) and a specification of what factors must be present for the de-energization event to be concluded.”²⁸

²⁸ Staff Proposal at 7-8.

CalCCA also supports requiring that the IOUs include “comprehensive information that is available on their websites regarding de-energization mitigation efforts including asset and vegetation management, sectionalizing, switching, system hardening, and backup power projects they are undertaking to reduce the need for or scope of de-energization events, progress on implementing de-energization mitigation efforts to date, and planned dates of completion” year round.²⁹

CalCCA supports the de-energization roadmap requirement,³⁰ and recommends that the IOUs be directed to also submit these roadmaps at minimum to the services lists for R.18-12-005 and R.19-09-009.

I. Definitions

CalCCA strongly supports the Staff Proposal’s expansion of the definition of “Critical Facilities and Infrastructure” to include 9-1-1 call centers and the transportation sector.³¹ However, CalCCA also believes that the definition of “Critical Facilities and Infrastructure” should be expanded to include the following additional facility/infrastructure categories, originally recommended in Appendix A of CalCCA’s Phase 2 Proposal:

- Emergency Services Sector:
 - Municipal or county yards relied upon to support first responder vehicles and equipment, repair infrastructure, and restore public services.
- Government Facilities Sector:
 - Schools.
 - Homeless shelters.
 - Residential children’s’ homes .
- Healthcare and Public Health Sector:
 - Residential / inpatient mental health facilities.
 - Assisted living facilities.
 - Designated cooling centers during dangerously hot weather.

As discussed above, in order to avoid misleading the public regarding the scale and impact of PSPS events, the IOUs should be required to use the term “accounts” rather than “customers” when

²⁹ *Id.*

³⁰ *Id.*

³¹ *Id.* at 8.

referring to the number of accounts or service points de-energized, and the term “individuals” to refer to the number of people impacted by a PSPS event. As such, CalCCA recommends that the Commission adopt the following definitions:

- “Accounts” – the number of customer accounts / service points impacted by a PSPS outage.
- “Individuals” – the number or estimated number of individuals that live and/or work in households or businesses impacted by a PSPS outage.

II. GENERAL RECOMMENDATIONS

A. The Commission Should Adopt A Consolidated Set Of Numbered De-Energization Rules

CalCCA has three recommendations regarding the structure and format of the PSPS Guidelines. First, CalCCA recommends that the title of the mandatory PSPS requirements adopted by the Commission be changed from “De-Energization Guidelines” to “PSPS Rules.” The title “De-Energization Guidelines” is not entirely accurate, and could lead to confusion and potential misinterpretation. “De-Energization” is a term that refers to a wide range of events, including events like planned maintenance outages. The requirements under consideration by the Commission do not relate to De-Energization generally, but instead apply only to PSPS events, and the title of the Commission’s PSPS-specific requirements should reflect this. In addition, the use of the term “Guidelines” is problematic, as by definition, “guidelines” are suggestions, not mandatory requirements. As the Commission has repeatedly and unambiguously established, the “Guidelines” adopted in D.19-05-042 and the amendments to those guidelines under consideration here are mandatory requirements for the IOUs, not suggestions or discretionary guidance.³² As such, the title “PSPS Rules” is more appropriate and should be used.

Second, CalCCA recommends that the Commission consolidate all mandatory PSPS-related requirements into a single set of PSPS Rules. Currently, the Commission’s PSPS-related requirements are set forth in Resolution ERSB-8 and Appendix A to D.19-05-042. Presumably, the final Decision in this track would create a third, separate document setting forth yet more requirements. This piecemeal approach significantly increases the potential for confusion, and is far

³² See generally, *Assigned Commissioner And Assigned Administrative Law Judge’s Ruling Directing Pacific Gas And Electric Company To Show Cause Why It Should Not Be Sanctioned By The Commission For Violation Of Public Utilities Code Sections 451 Commission Decision 19-05-042 And Resolution ERSB-8.*

less efficient than a single, consolidated set of PSPS Rules. In its Phase 2 Decision, the Commission should adopt a single set of PSPS Rules that consolidates Resolution ERSB-8, Appendix A to D.19-05-042, and any additions and changes approved in this Phase of the Rulemaking.

Third, the consolidated PSPS Rules should be numbered to allow for clear and precise citation. CalCCA has repeatedly experienced the difficulty of citing to the existing De-Energization Guidelines adopted in D.19-05-042, having to cite to pages of the De-Energization Guidelines rather than specific Rules. CalCCA recommends that the Commission adopt the following identifications for the consolidated PSPS Rules. This outline is based on the structure of the D.19-05-042 De-Energization Guidelines, with Rules incorporated from Resolution ERSB-8 identified in *italics*, and Rules from the Staff Proposal (with CalCCA's suggested modifications, discussed below) in underlined text.

- **Rule 1** – Overarching Guidelines
- **Rule 2** – Definitions
- **Rule 3** – Notice Requirements
 - 3.1 Notification and Priority
 - 3.2 Timing of Notification
 - 3.3 Responsibility for Notification
- **Rule 4** – Identification of Customer Groups
 - 4.1 First/Emergency Responders and Public Safety Partners
 - 4.2 Critical Facilities and Infrastructure
 - 4.3 Access and Functional Needs Populations
 - 4.4 All Other Customers
- **Rule 5** – Pre-PSPS Notification Information Requirements
 - 5.1 Advanced Outreach and Education
 - 5.2 Notification Preceding a PSPS Event
- **Rule 6** – Public Notice and Communication Methods
 - 6.1 *Public Outreach and Notification Requirements from Resolution ERSB-8*
 - 6.2 Public Notice and Communications
 - 6.3 Notice and Communication Requirements from Staff Proposal
- **Rule 7** – Communication and Coordination With Public Safety Partners

- **Rule 8** – Coordination With Emergency Operation Centers and Incident Command Systems
- **Rule 9** – Working Groups and Advisory Boards
- **Rule 10** – De-Energization Exercises
- **Rule 11** – Post-Event Reporting
 - 11.1 *Reporting Requirements from Resolution ERSB-8*
 - 11.2 Reporting Requirements from D.19-05-042
- **Rule 12** – Requests to Delay De-Energization and to Re-Energize
- **Rule 13** – De-Energization of Transmission Lines
- **Rule 14** – Mitigation Requirements
- **Rule 15** – Community Resource Centers
- **Rule 16** – Reasonableness Review
 - 16.1 *Reasonableness Review Requirements from ERSB-8*
 - 16.2 Reasonableness Review of PSPS Decisionmaking (CalCCA Proposal)

B. The Commission Should Adopt Rules Governing The PPS Decisionmaking Process

CalCCA strongly recommends that, in addition to the existing De-Energization Guidelines, and the additional guidelines set forth in the Staff Proposal, the Commission Rules and the recommendations provided in the Staff Proposal, the Commission adopt a set of Rules requiring that before calling a PPS event, the IOUs fully account for (and where possible quantify) the reasonably foreseeable costs and harms associated with initiating the planned PPS event, and balance these costs/harms against potential fire danger.

In dealing with PPS events, the Commission faces a fundamental regulatory problem – the financial interest of the regulated for-profit monopolies is at odds with the public interest. The public interest is in ensuring that PPS outage are used as a last resort, to the absolute minimum extent possible, and only where the reasonably likely wildfire costs/harm avoided by calling a PPS outage clearly outweigh the overall costs/harms created by calling an intentional power outage. The IOUs’ incentives are in direct conflict with the public interest. The IOUs are operated by executives that have a binding fiduciary duty to maximize profits for their shareholders. The IOUs have a financial interest in calling broad and frequent PPS events in order to avoid even a small likelihood of causing a wildfire, and even if the costs/harms caused by the PPS greatly outweigh the wildfire

risk. This is because wildfire costs are generally borne by the utility that started the fire, while currently there not an established mechanism for holding IOUs accountable for the costs/harms created by PSPS events.³³ In other words, the IOUs have an incentive to avoid costs that they'll have to internalize (wildfire liability), even if that means taking actions that create massive external costs borne by the public.

The costs/harms created by PSPS events cover a wide range and, in some cases, are of a staggering scale. In opening comments in this docket, CalCCA and other parties identified a wide range of costs and harms created by PSPS events:

- Overall economic impact (from lost productivity, interrupted manufacturing processes, delayed and disrupted business transactions, product losses and waste, etc.)
- Emergency response and mitigation expenses incurred by tribal and local government agencies.
- The threat of significant physical harm to medically vulnerable individuals.
- Impact on the public welfare from the interruption of basic public services.
- Impact on low-income individuals and families, particularly from hourly employees lost wages and food spoilage.
- Impact on access and functional needs populations.
- Impacts on small businesses (lost revenue, spoilage, etc.).
- Increased structure fire, wildfire, and carbon monoxide risk due to the widespread use of diesel generators.

The economic harm caused by large scale PSPS events is equivalent to that of a significant disaster. PG&E's October 26 – November 1 consolidated PSPS outages impacted a total of 832,314 residential accounts and 108,903 non-residential accounts. According to the Interruption Cost Estimator developed by the Department of Energy, The Lawrence Berkeley National Laboratory, and Nexant, a *one-day* outage to this many accounts would cause \$628.6 million in economic losses. Given the fact that most customers experienced multi-day outages during this event, the economic damages from these events is almost certainly in the multi-billion dollar range.

³³ CalCCA believes that existing law provides a solid basis for allowing various injured parties to recover damages from PG&E for PSPS-caused costs/harms. However, CalCCA has not confirmed that any of these avenues for recovery has been fully tested in the PSPS context.

To date, the IOUs have not made any effort to even acknowledge, much less consider, the reasonably foreseeable costs/harms created by PSPS outages in deciding whether to call PPS events. For instance, in its PPS Post-Event Report for the October 26 – November 1 outage, PG&E reports only four factors that it considered in determining whether to call the PPS event: likelihood of an ignition event, the potential for fire spread, and the number of customers (including medical baseline and critical customers) that would lose power, and the availability of mitigation measures to reduce the number of customers impacted.³⁴ PG&E’s consideration of customer impact stopped at counting the number of customers impacted, and PG&E failed to account for or quantify the costs and harms that these customers would suffer as a result of the outage.

In order to address the IOUs’ failure to conduct the basic cost-benefit analysis required to protect the public interest, CalCCA requests that the Commission add several additional requirements under a new Rule titled “Reasonableness Review.” Specifically, the Commission should add the following:

- Before initiating a PPS event, the IOU must fully account for, and wherever possible quantitatively estimate using Commission-approved methodologies, all reasonably foreseeable harms and costs that would be created by the anticipated PPS outage, including, at a minimum, the following, the harms listed above.
- The IOUs must perform this cost/harm accounting and estimation for both the planned de-energization event as a whole, and separately for each individual transmission line, substation, and distribution circuit to be de-energized.
- The Energy Division shall convene a workshop no later than 60 days after the issuance of this Decision to develop standard, mandatory methodologies for quantitatively estimating the following PPS-related costs/harms:
 - Immediate financial impact to customers, including but not limited to, lost wages, lost food, and lost medicines.
 - Impact to education system and children for schooling, home care (lost work for parents), health and welfare for those receiving meals from schools, etc.
 - Overall economic impact.

³⁴ PG&E Public Safety Power Shutoff (PPS) Report to the CPUC October 26 & 29, 2019 De-Energization Event, at 6-8.

- Overall impact to local government resources (including staff time, equipment, increased police and fire services, increased social services)
- Risk from re-energization to infrastructure and equipment both businesses and critical facilities.
- Before initiating a PSPS event, the IOU must conduct a balancing test that weighs the potential for wildfire harm against the reasonably foreseeable costs/harms from de-energization. The IOU must conduct this balancing test for both the overall de-energization event as a whole, and separately for each substation, transmission line, and distribution circuit to be de-energized.
- The IOUs must perform the required balancing test, all wildfire risk projections, and all estimation, quantification, and accounting of PSPS-related costs/harms in an unbiased and neutral manner, regardless of whether the costs/harms are likely to be borne by the IOU (wildfire liability) or externalized and borne by the public (PSPS costs/harms).
- In their required PSPS post-event reports, the IOUs must provide detailed documentation of the balancing test performed prior to deciding to initiate the PSPS event.
- In reviewing each PSPS post-event report, the Safety and Enforcement Division shall review: 1) the IOU's compliance with these requirements; and 2) the neutrality and reasonableness of the IOU's decision to call the PSPS event, and to de-energize each specific transmission line, substation, and distribution circuit. If the SED determines that the IOU failed to comply with these requirements or that any of its de-energization decisions were unreasonable in light of the reasonably foreseeable costs/harms of de-energization, the SED shall refer the violation to the Commission for enforcement.

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III. CONCLUSION

CalCCA thanks the Commission for its consideration of these Opening Comments.

Respectfully Submitted,

/s/ David Peffer

David Peffer
BRAUN BLAISING SMITH WYNNE P.C.
555 Capitol Mall, Suite 570
Sacramento, CA 95814
Tel: (916) 326-5812
E-mail: peffer@braunlegal.com