

Braun Blaising Smith Wynne, P.C.

Attorneys at Law

June 4, 2020

Via E-Mail (EDTariffUnit@cpuc.ca.gov)

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

**Subject: Response of The California Community Choice Association To PG&E
Advice Letter 4249-G/5827-E.**

Dear Energy Division:

The California Community Choice Association (“CalCCA”) hereby offers the following response to Pacific Gas and Electric Company (“PG&E”) Advice Letter 4249-G/5827-E (the “AL”). As set forth below, CalCCA supports the AL as a general matter, and recommends that the Commission approve the AL subject to two minor amendments that implement existing Commission requirements and will improve PSPS notification and related planning and resiliency efforts.

In accordance with D.20-03-004 and related rulings, the AL provides PG&E’s Community Wildfire Safety Outreach Workplan and Budget, which includes PG&E’s study identifying the prevalent languages used by customers in its service area. CalCCA supports PG&E’s efforts to improve its public safety power shutoff (“PSPS”) and wildfire notification efforts, and in particular its efforts to provide notification in customers’ preferred language. CalCCA applauds PG&E’s significant work in this area demonstrated in the AL.

CalCCA asks that the Commission approve the AL subject to two minor amendments. First, CalCCA asks that the AL be approved with the additional direction that PG&E share its customer language preference information with CCAs, specifically:

- All study results and underlying study data that provide language information for the communities served by the CCA.
- All customer-specific preferred language information collected or held by PG&E for all of the CCA’s generation customers.

Second, CalCCA asks that PG&E be instructed to collaborate with the CCAs going forward in its efforts to identify customer language and communication preferences and its efforts to develop PSPS and Wildfire notification plans.

These suggested amendments are reasonable. As the entity responsible for initiating and managing Public Safety Power Shutoff (“PSPS”) outages, PG&E bears responsibility for providing all customers with timely, in-language notice. However, because CCAs are both generation service providers and local government agencies with close ties to their communities, CCAs have a unique role to play in the PSPS context. CCAs play a leading role in the development and deployment of resiliency resources and programs within their service areas, and some CCAs may be able to assist local emergency planning and response agencies in the PSPS context. Asking PG&E to share language study results and customer-specific language designations with CCAs, and to include CCAs in future language studies and notification plans, will improve CCAs’ resiliency efforts and their abilities to assist local emergency agencies if called upon to do so. Many CCAs have an interest in working with PG&E and their local emergency response and planning agencies to reduce the impact of PSPS outages, and ask that the Commission encourage and facilitate this collaboration.

These suggested amendments are consistent with existing Commission requirements. Each CCA has a broad right to access all investor owned utility (“IOU”) information regarding all electric customers within the CCA’s service area.¹ This right extends to all information that the CCA determines is relevant to the provision of CCA service.² Asking PG&E to share study results and customer language designations is consistent with this requirement, and will allow CCAs to better participate in efforts to reduce the impact of PSPS outages.

Again, CalCCA is greatly encouraged by PG&E’s efforts to improve in-language customer notice. CalCCA invites PG&E to engage with it and its member CCA programs to further improve and coordinate information sharing and customer notification planning.

///

¹ Public Utilities Code Section 366.2(c)(9) (IOUs must “cooperate fully” with CCAs, including “providing the [CCAs] with appropriate billing and electrical load data”); D.04-12-046 at 52 (IOUs must “provide all relevant usage information, load data, and customer information to CCAs”).

² D.04-12-046 at 53 (“The utilities may not determine what information is ‘relevant’ to CCA operations...”); D.05-12-041 at 38-39 (“[w]e have found that AB 117 does not permit the utilities to second-guess a CCA’s request for relevant information and we will not revisit the issue here. The



Dated: June 4, 2020

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

On Behalf Of:
CalCCA

Copy (via e-mail):

Pacific Gas & Electric
Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
E-mail: PGETariffs@pge.com

California Public Utilities Commission
Wildfire Safety Division
wildfiresafetydivision@cpuc.ca.gov

Service List R.18-10-007

utilities' tariffs, therefore, shall include a provision that permits CCAs to access all relevant customer information").