

**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)

**RURAL COUNTY REPRESENTATIVES OF CALIFORNIA REPLY
COMMENTS ON PHASE 3 SCOPING MEMO AND STAFF PROPOSAL**

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I. Introduction

In accordance with Rule 6.2 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure (“Rules”), the Rural County Representatives of California (RCRC) submits these reply comments to the Order Instituting Rulemaking 18-12-005 (“Rulemaking”) *Assigned Commissioner’s Phase 3 Scoping Memo and Ruling* issued February 19, 2021. RCRC received party status via written ruling on March 18, 2019.

II. Comments

RCRC sincerely appreciates the Commission’s efforts to improve the Guidelines governing how utilities conduct Public Safety Power Shutoff (PSPS) events. Given the impact wildfires have had on our counties, we understand and appreciate the role that small, focused, narrowly tailored PSPS events play in reducing the risk of utility-caused wildfire. The Phase 1 and Phase 2 PSPS Guidelines¹ established a solid foundation for those events; however, there are instances where utilities still fail to adhere to those requirements. Recent experiences illustrate that more refinements are necessary, including many Phase 3 proposals. While the Phase 3 Staff Proposal is generally supportable, we note that it merely seeks to finetune an unacceptable status quo.

¹ *Decision D.19-05-042 - Decision Adopting De-Energization (Public Safety Power Shut-Off) Guidelines (Phase 1 Guidelines)*, May 30, 2019; and *D.20-05-051 -Decision Adopting Phase 2 Updated and Additional Guidelines for De-Energization of Electric Facilities to Mitigate Wildfire Risk*, May 28, 2020, respectively.

RCRC agrees with the Energy Producers and Users Coalition that “PSPS were intended originally as an interim strategy for investor-owned utilities (IOUs) while they worked to harden their infrastructure and improve vegetation management. Unfortunately, this interim solution will apparently be in use for some time.”² “De-Energization is an extraordinary practice, which was never intended to become a standard utility program.”³ We agree with the Center for Accessible Technology and caution the Commission against “normalizing de-energization and accepting it as an ongoing activity that all the IOUs conduct.”⁴ The Commission should not settle for merely establishing parameters for the conduct of PSPS events. It must do all in its power to drive the utilities to improve system resiliency to ensure that all Californians have safe and *reliable* electricity. “PSPS events are not a surrogate for the lack of necessary infrastructure upgrades, inadequate vegetation management, or a lack of planning.”⁵ The Commission’s end goal should be to create a system where PSPS events are simply not necessary.

The utilities’ posture on several of these Phase 3 guidelines lends greater impetus for the Commission to regularly review the reasonableness of PSPS events. In particular, the utilities suggest modifying several of these Phase 3 guidelines to merely require them to make “reasonable efforts” to do various things.⁶ Unfortunately, there has been little review as to whether their previous efforts (or the underlying need to shut off power to a given community) were reasonable. Without certainty that they may be held accountable for their unreasonable actions, or even be sure that there will be a review, there is little incentive for utilities to ensure that PSPS events are used sparingly and phase out their use.

RCRC is also troubled by Southern California Edison’s (SCE) posture that it is merely a utility company and so should not be required to undertake certain actions to mitigate PSPS impacts on their customers.⁷ It appears concerned about potential liability if a medically sensitive customer who uses a CRC has an accident or is injured, but completely ignores the far more likely

² *Comments of the Energy Producers and Users Coalition on the Assigned Commissioner’s Phase 3 Scoping Memo and Ruling*, March 19, 2021, Page 2.

³ *Center for Accessible Technology’s Opening Comments on De-Energization Phase 3 Scoping Memo and Ruling*, March 19, 2021, Page 2.

⁴ *Id.*, Page 10.

⁵ *Energy Producers and Users Coalition*, Page 4.

⁶ *Pacific Gas and Electric Company’s (U 39 E) Opening Comments on Assigned Commissioner Batjer’s Phase 3 Scoping Memo and Ruling*, March 19, 2021, Attachment A.

⁷ *Southern California Edison Company’s (U-338-E) Opening Comments on Assigned Commissioner’s Phase 3 Scoping Memo and Ruling*, March 19, 2021, Page 4.

risk that medically sensitive customers who have their power shut off will be adversely impacted by that loss of power.⁸ SCE argues that customers should have evacuation plans in place anyway, so utilities should not bear the burden of transporting mobility-impaired customers who live in multi-story buildings when a PSPS prevents use of residential elevators.⁹ There is merit to SCE's offer to work with community-based organizations to disseminate information to address this; but that alone is insufficient. We should not be cavalier about what may occur when power is shut off: elderly and mobility impaired residents being unable to leave the confines of their apartment for several days at the same time they cannot use air conditioning, refrigerators, or even microwaves until power is restored. SCE's overarching theme is that the costs are too great for ratepayers to bear and so it seeks to shift these responsibilities onto local governments and "trusted community-based organizations."¹⁰ The Commission cannot allow utilities to externalize their obligation to mitigate impacts their decisions have on customers.

We believe it is vital for the Commission to expand the scope of Phase 3 to incorporate several suggestions made by other parties, conduct regular reasonableness reviews, drive system upgrades that make pre-emptively shutting off power unnecessary, and consolidate all of the PSPS guidelines into a single General Order.

A. The Commission Must Address Other Issues Not Included in the Scoping Memo.

RCRC agrees with many other parties that multiple issues have been overlooked by this Phase 3 Scoping Memo and should be incorporated or addressed immediately following this phase. RCRC supports the following suggestions made by other parties to this proceeding:

- Consolidate and codify into one single document all the existing decisions, resolutions, and other guidelines governing PSPS events.¹¹ Utilities and the general public all would benefit from consolidating all of the various PSPS Guidelines and requirements into a single

⁸Southern California Edison, Pages 2-3.

⁹ Southern California Edison, Pages 4-5.

¹⁰ *Id.*

¹¹ *Opening Comments of Pioneer Community Energy, East Bay Community Energy, Sonoma Clean Power Authority, and California Choice Energy Authority on Draft Phase 3 PSPS Guidelines* (Joint CCAs), March 19, 2021, Pages 2 and 8; *Joint Local Governments*, Page 2; *Joint Communications Parties' Opening Comments on the Phase 3 Staff Proposal*, March 19, 2021, Page 2; *Center for Accessible Technology*, Pages 6-7.

standalone document.¹² This will provide regulated utilities with more certainty about their obligations and help the public understand the expectations placed on utilities.

- Establish criteria for the Commission to evaluate the efficacy and reasonableness of PSPS events and ensure that they are truly used as a last resort when no other options are available to reduce the risk of utility-caused wildfire.¹³ We commented extensively on the need to incorporate reasonableness reviews into the Commission’s regular order of business and incorporate by reference those comments in support of this suggestion by other parties.¹⁴ We agree with many comments made by Acton Town Council that support this recommendation.
- Assess public safety risks and economic impacts resulting from each PSPS event.¹⁵ We agree with the Small Business Utility Advocates’ observation that there has not yet been “any meaningful assessment of the reasonableness of the public safety harms and financial losses caused by IOU decisions to shut off power to millions of people.”¹⁶ Until such an analysis is performed, it is difficult to properly balance the tradeoffs between the risk avoidance benefits of utility decisions to conduct PSPS events and the consequences of those decisions. The Acton Town Council concisely illustrates just some of the public health, safety, and environmental risks triggered by PSPS events, including failure of critical communications infrastructure (which the Commission is commendably addressing in the Emergency Disaster Relief Program Proceeding), the strain deenergization places on responding to concurrent emergencies, the increased risk of fires caused by residents resorting to generators or cooking outside because of prolonged loss of power, increased health risks to medically sensitive residents, and damage caused to sensitive customer equipment by unannounced reenergization.¹⁷ As previously stated, RCRC is well aware of the risk-avoidance benefits of PSPS events and does not dispute their utility in those cases where shutting off the power is absolutely necessary; however, those decisions should be balanced against the harms that will

¹² *Rural County Representatives of California Comments on Phase 3 Scoping Memo and Staff Proposal*, March 15, 2021, Page 2; *Comments of the Rural County Representatives of California on the Safety and Enforcement Division’s Report and the Future of this Proceeding*, December 2, 2020, Page 4.

¹³ *Opening Comments of Acton Town Council*, March 19, 2021, Pages 5-7; *Joint Local Governments*, Page 4.

¹⁴ *Comments of the Rural County Representatives of California on the Safety and Enforcement Division’s Report and the Future of this Proceeding*, December 2, 2020, Pages 4-5.

¹⁵ *Center for Accessible Technology*, Page 8.

¹⁶ *Small Business Utility Advocates’ Opening Comments on Phase 3 Scoping Memo*, March 19, 2021, Page 3.

¹⁷ *Acton Town Council*, Pages 14-15.

be caused and should be mitigated to the greatest extent feasible by infrastructure improvements and other customer-specific actions.¹⁸

- Establish a claims process for customers, critical facilities, and local governments for deenergization related losses.¹⁹ We support the Joint Local Governments’ request to develop “a claims process for customers, critical facilities, and local governments for deenergization-related losses” and their justifications for doing so.²⁰ PSPS events can cause unsustainable costs for many Californians, not only in terms of lost productivity, but especially in terms of food and medicine spoilage. The cost of replacing food and medicine may be very hard for many Californians to bear – especially those living in rural communities.²¹ We appreciate the efforts of PG&E and others to try and mitigate some of those impacts and providing replacement food in some circumstances; however, the Commission should establish a formal process for claims review and reimbursement. Utilities cannot simply tell customers that they should have a plan in place for when the power goes out, especially when the switch is controlled by the utility itself. Many Californians simply cannot afford a backup generator or may be unable to relocate for the duration of a PSPS event. We note that many local governments have shouldered similar PSPS response costs. Establishment of a claims process may encourage utilities to de-energize more responsibly and expedite efforts to improve system resilience. It will certainly help relieve the impacts that PSPS events have on local governments and residential customers.

B. Community Resource Centers

Community Resource Centers (CRCs) are an important part of utility efforts to mitigate the impact of PSPS events on customers, especially those with sensitive medical conditions.

RCRC appreciates PG&E’s efforts to develop a more robust CRC program for the 2020 PSPS events and acknowledges that COVID-19 made siting fixed, indoor locations challenging. At the same time, we applaud the Commission’s shift toward indoor sites, especially during periods of unhealthy air quality, for all the reasons we previously outlined.²² While the Guidelines should provide some flexibility to accommodate local health requirements related to COVID, we

¹⁸ *SBUA*, Page 7; *Center for Accessible Technology*, Page 25.

¹⁹ *Joint Local Governments*, Page 2.

²⁰ *Id.*, Pages 15-16.

²¹ *Id.*, Page 12.

²² *Rural County Representatives of California Comments on Phase 3 Scoping Memo and Staff Proposal*, March 19, 2021, Pages 2-4.

note that these Guidelines will last for many PSPS seasons - hopefully well beyond COVID. While PG&E accurately observes that several counties have a significant number of days in which the air quality index exceeds 101,²³ the cumulative pollution burden those communities face is all the more reason for using indoor CRCs. Furthermore, we dispute PG&E's assertion that sensitive customers can simply opt to go to an indoor site rather than the outdoor site nearer their community.²⁴ It is not clear there will be such a saturation of CRCs in a given area or that indoor sites will be located within a reasonable distance. Nor is it clear that sensitive customers have the resources to travel longer distances to an indoor facility.

RCRC agrees with SDG&E that utility strategies to support medical baseline and access and functional needs populations should be incorporated into CRC planning efforts.²⁵ At the same time, we question what the utility means when it refers to strategies to *reasonably* support those customer groups. Generations of Californians have grown to depend upon the reliable electricity that today's utilities provide. As such, any power disruption can have deep impacts upon those individuals and communities impacted – especially those who depend upon electricity to support life-saving medical devices. We fear that couching utility mitigation efforts in such terms could provide a free pass to utilities to do less than their very best to minimize the impact of PSPS events – especially in the absence of regular reasonableness reviews by the Commission.

We agree with SDG&E that CRC's cannot realistically be expected to provide all necessary resources for medical baseline and AFN populations.²⁶ But CRCs are only one of a portfolio of mitigation tools the utilities should employ to protect customers power is shut off.

We agree with the Joint CCA's about the underlying need for refinement of the PSPS Guidelines regarding CRCs. We are similarly troubled by the fact that some CRCs merely offered snacks, bottled water, and phone charging because those services fall far short of the need created by shutting off electricity for entire communities for several days at a time.²⁷ This is why CRCs need to provide those services recommended by local governments and health agencies. To the extent that utilities provide sub-par resources to impacted customers, there will be fewer customers who use those facilities. This will lead to inaccurate conclusions that CRCs are unneeded or

²³ PG&E, Page 4.

²⁴ *Id.*

²⁵ *Opening Comments of San Diego Gas & Electric Company (U 902-E) on Phase 3 Staff Proposal*, March 19, 2021, Page 2.

²⁶ SDG&E, Page 2.

²⁷ *Joint CCAs*, Page 2.

unwanted by the community. While the Joint CCA's suggest services that could be provided by CRCs,²⁸ some of those may be satisfied by other utility actions that are particularly tailored to individual customers, including transportation and accommodation at locations where medical devices can be powered. The lynchpin is coordination with local governments and health agencies, which will help to ensure that local needs are met while avoiding unnecessary redundancy.

C. Critical Facilities and Infrastructure

We agree with the Acton Town Council that the role and purpose of the "critical facilities plan" is unclear²⁹ and urge the Commission to refine the requirement, perhaps by including the information suggested by the Joint CCAs.³⁰

D. Definitions

a. Concurrent Emergency.

RCRC agrees with several parties that the definition of "concurrent emergency" is unnecessarily restrictive and could inhibit resiliency by focusing exclusively on wildfires that occur during a PSPS event.³¹ There are many other types of emergencies that could occur³² and it is important to ensure that utilities anticipate non-wildfire events.

b. Critical Facilities.

RCRC agrees with NCPA when they urge IOUs to collaborate with POUs and electric cooperatives that are transmission customers of the IOUs to determine the impact of deenergization on critical facilities and infrastructure served by those transmission customers.³³ Such collaboration will better inform the IOUs decision-making by providing a clearer picture of the downstream effects of deenergization.

RCRC questions SDG&E's opposition to establishing a pathway for entities to apply for designation as a critical facility. SDG&E argues that the definitions in Phase 1 and Phase 2 (and the changes proposed in Phase 3) "clearly define critical facilities as those essential to the public safety."³⁴ We point out the Phase 1 Decision D.19-05-042, the Commission adopted an "interim list" of critical facilities and infrastructure, noting that utilities often list additional or different

²⁸ *Id.*, Page 3.

²⁹ *Acton Town Council*, Page 19.

³⁰ *Joint CCAs*, Page 4.

³¹ *Joint CCAs*, Page 5; *SDG&E*, Page 5.

³² See *Rural County Representatives of California Comments on Phase 3 Scoping Memo and Staff Proposal*, Page 6.

³³ *Northern California Power Agency Comments on Phase 3 Staff Proposal*, Pages 4-5.

³⁴ *SDG&E*, Page 4.

facilities than what was listed and that utilities should partner with local government and public safety partners to develop a list of critical facilities in those areas. Indeed, the Commission urged utilities to be prepared to work with the Commission in the future to adopt a comprehensive list of the types of critical facilities and infrastructure.³⁵ Instead of developing a comprehensive list, the Commission has instead chosen to supplement those lists in Phase 2 and Phase 3 of this proceeding. We hope that a comprehensive list will be established in a forthcoming General Order; however, even with such a comprehensive list, we see merit to establishing a process through which a critical facility can be added to the utility list.

We are sympathetic to claims that some potential additions to the list - especially in the transportation sector - will dramatically and unsustainably expand the number of designated facilities and frustrate existing efforts to mitigate impacts to critical facilities.³⁶ As such, we believe that further refinements to the definition of “facilities for civic participation” and “emergency feeding organizations” may be necessary to focus notification and mitigation assistance toward those types of operations for which assistance is most pressing (voting centers/vote tabulation facilities and food storage sites/food banks).³⁷

E. Education and Outreach.

We support the Center for Accessible Technology’s plea for adequate support for community-based organizations in utility efforts to gather information, coordinate outreach, and mitigate PSPS impacts on those with sensitive medical conditions. We agree that “it is unreasonable to expect these organizations to provide substantial assistance to the IOUs” unless they are adequately compensated for those actions.³⁸

F. Medical Baseline and Access and Functional Needs Communities.

Back-up batteries must last longer than six hours given that Community Resource Centers (CRCs) are closed during nighttime hours and cannot provide assistance operating medical equipment over that period. While we suggested that utilities provide battery replacement services to customers if they are using a battery with such a short service life, we support other parties’ suggestion that the Commission require a longer battery life at the outset.³⁹ Regardless,

³⁵ Decision 19-05-042, *Decision Adopting De-Energization (Public Safety Power Shutoff) Guidelines (Phase 1 Guidelines)*, May 30, 2019, Appendix A4-A5.

³⁶ *PG&E*, Page 8.

³⁷ *SDG&E*, Page 6.

³⁸ *Center for Accessible Technology*, Page 15.

³⁹ *Joint Local Governments*, Page 14; *Center for Accessible Technology*, Page 18.

there may still be a need for replacement service even if the utility provides a 24-hour battery, especially since some residents are deenergized for several days at a time.

We agree with SDG&E and PG&E that utilities should be able to customize battery back-up programs to meet the needs of individual customers⁴⁰; however, that should not preclude the Commission from establishing minimum mitigation standards and expectations. Utilities should not be required to put a battery in every home, since some customers may have generators, SGIP energy storage systems, or may simply not want a battery. Utilities should not be required to have a ready stock of emergency batteries to deploy to *every* customer, but they should have enough on hand to quickly distribute to those customers in need during a PSPS event.

PG&E and SCE suggest targeting the deployment of these batteries to medical baseline customers.⁴¹ While appropriate targeting should be considered, many vulnerable customers may not qualify for the medical baseline program and so we object to utility efforts to limit eligibility to only those low-income residents currently enrolled in the Medical Baseline program. PG&E correctly notes that the number of customers impacted by 2020 events was sharply lower than the 2019 season, but we observe that PG&E may soon be subject to newly-imposed conditions that require them to double or even triple the number of outages in many of our counties over the next decade.⁴² We agree with PG&E that individual assessments may show that medically sensitive residents need something other than a portable battery⁴³ or may need a more powerful battery than contemplated by the Commission. The Commission should afford utilities some amount of flexibility; however, the Commission must stress that the deliverable is not the individual needs assessment but actual mitigation of the PSPS impacts on the customer.

We are also troubled with the Center for Accessible Technology's observation that the existing PG&E program to provide hotel vouchers to support those with medical vulnerabilities is too limited and may not support all those customers who need assistance.⁴⁴ RCRC has long urged the Commission to ensure that those utility AFN mitigation programs are both adequate in terms of the geographic locations served and sufficiently funded to ensure that they can fully serve all those who need assistance.

⁴⁰ SDG&E, Page 15; PG&E, Page 13.

⁴¹ PG&E, Page 14; SCE, Page 7.

⁴² Michael Liedtke, Jude Mulls Requiring PG&E to Turn Off Power More Frequently, AP News, March 23, 2021., <https://apnews.com/article/us-news-wildfires-fires-california-courts-a497730ba09512de048a1ab240e068cb>.

⁴³ PG&E, Page 14.

⁴⁴ Center for Accessible Technology, Page 18.

G. Mitigation.

RCRC notes that utilities have significantly improved their efforts to mitigate PSPS impacts. The deep and recurring impacts of PSPS events continue to destabilize many communities. We strongly agree with NCPA that utilities should continuously study and analyze their systems to determine the best ways to avoid the need for deenergization through segmentation, system hardening, redirecting current, etc.⁴⁵

In addition to mitigation of risks on the electrical system, we join the Joint Local Governments in urging the Commission to continue placing greater emphasis on requiring utilities to mitigate the impacts of deenergization on customers.⁴⁶ We agree that with the Center for Accessible Technology that the scope of the mitigation envisioned in the Phase 3 Staff Proposal is too narrow in that it focuses only on the impact of deenergization on transmission.⁴⁷ We too support mitigating the impacts on transmission customers but note that the need for mitigation applies to all customers. If the mitigation burden seems too great, we urge utilities to expedite their efforts to improve infrastructure and system resilience to reduce the size, scope, frequency, and duration of PSPS events, thereby minimizing the underlying need for mitigation.

H. Notification.

RCRC strongly agrees with the California Large Energy Consumers Association statement that “utilities must continue to maintain responsibility for customer notification.”⁴⁸ As they outlined, this will “ensure that information reaches customers quickly, avoiding delays caused by information being passed through multiple parties, or by improperly relying on other parties to provide timely notice.”⁴⁹ We reiterate that utilities have the most knowledge of those customers who will be impacted by an event, the contact information for those parties, and the jurisdiction to call or cancel a PSPS event.

RCRC strongly supports the Public Advocates Office suggestion that the existing notification timeline should be recast as a requirement and that non-compliance must be reported in post-event reports.⁵⁰ As we previously stated earlier in this proceeding, “While we understand

⁴⁵ NCPA, Page 6.

⁴⁶ *Joint Local Governments*, Pages 14-16; *Center for Accessible Technology*, Page 19.

⁴⁷ *Center for Accessible Technology*, Page 20.

⁴⁸ CLECA, Page 4.

⁴⁹ *Id.*

⁵⁰ *Comments of the Public Advocates Office on the Assigned Commissioner’s Phase 3 Scoping Memo and Ruling*, March 19, 2021, Page 9.

that changing weather conditions may make it difficult to always provide early notifications, the ‘where feasible’ clause provides little incentive for utilities to ensure that all customers are timely notified. Inadequate notification can wreak havoc on emergency response and put people and communities at risk. While we can appreciate the challenges of predicting extreme weather patterns, utilities must be given clearer expectations of who, when, and how to communicate prospective a de-energization event. If these metrics cannot be achieved, explanations should be included in the post-event report.”⁵¹

We also agree with several other Public Advocates Office suggestions for post-event reports. We support requiring inclusion of information on the number of customers deenergized outside of Tier 2 and Tier 3 High Fire Threat Districts.⁵² As so many other programs and decision are linked to those areas, it would be very helpful to get a better understanding of how many customers outside those areas are impacted by PSPS events. We also support requiring utilities to report all requests by public safety partners for selective-reenergization and whether they were approved or rejected (including the grounds for rejection).⁵³ This information is vital to better understand responses to other events and emergencies that locals believe merit reenergization.

The Joint Local Governments make a compelling case about the chilling effect of requiring utilities to update public-facing notifications immediately after private notifications to public safety partners and emergency managers.⁵⁴ While we support timely notifications to the public, the real-world effects of the Staff Proposal may do more harm than good.

I. Reporting.

RCRC agrees that with the Small Business Utility Advocates that post-event reports should focus greater attention on why the equipment serving an impacted circuit is not resilient enough to operate safely.⁵⁵ We also agree that utilities should periodically reevaluate whether their equipment is adequately designed and maintained to operate amid changing meteorological conditions.⁵⁶ If a given circuit is repeatedly deenergized, perhaps the equipment itself is inadequate to withstand local operating conditions and should be upgraded accordingly.

⁵¹ *Comments of the Rural County Representatives of California on the Safety and Enforcement Division’s Report and the Future Scope of this Proceeding*, December 2, 2020, Pages 7-8.

⁵² *Public Advocates Office*, Page 10.

⁵³ *Id.*

⁵⁴ *Joint Local Governments*, Pages 20-22.

⁵⁵ *Small Business Utility Advocates*, Page 4.

⁵⁶ *Id.*

The Small Business Utility Advocates commendably urges reports to require utilities to separately justify the need for de-energization on a circuit-by-circuit basis.⁵⁷ We agree that this should be paired with a discussion of system improvements that will reduce the need for deenergization of that circuit in the future.⁵⁸ We also support the Public Advocates Office suggestion that the timeframe for the Commission’s circuit-by-circuit analysis be expanded from the two-year timeframe outline in the Staff Proposal to at least a four-year period.⁵⁹ Given experiences over the last two years and the fact that these guidelines will govern PSPS events for several years to come, we believe a two-year scope is far too short.

RCRC agrees with the Public Advocates that the Commission should require the Safety and Enforcement Division to propose the contents for annual pre- and post-season reports and that those suggestions should be open to public comments and refinement by stakeholders.⁶⁰

III. Conclusion

We urge the Commission to consolidate all PSPS guidelines into one comprehensive document. This will greatly reduce confusion and help utilities and stakeholders better understand the framework that governs a very complex de-energization scheme. The Commission must also expand the scope of Phase 3 to address the numerous outstanding issues articulated above, including undertaking regular reasonableness reviews. Given the expected timeframe over which the public will have to endure PSPS events, the Commission must make a serious effort to validate utility de-energization decisions.

RCRC appreciates your consideration of our comments, and respectfully requests your acceptance of these comments for filing.

Respectfully submitted,

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⁵⁷ *SBUA*, Page 6.

⁵⁸ *SBUA*, Page 8.

⁵⁹ *Public Advocates Office*, Page13.

⁶⁰ *Public Advocates Office*, Page 5.