

**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 COMMENTS  
ON PG&E's POST-PSPS EVENT REPORTS FOR OCTOBER 10, 2019,  
OCTOBER 25, 2019 AND NOVEMBER 8, 2019**

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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 comments to the Order Instituting Rulemaking 18-12-005 (“Rulemaking”).

**II. Comments**

On behalf of the Rural County Representatives of California (RCRC), I am pleased to offer comments on PG&E’s Post-PSPS Event Reports for October 10, 2019, October 25, 2019 and November 8, 2019 per the Assigned Commissioner’s Amended Phase 2 Scoping Memo and Ruling dated December 19, 2019. RCRC received party status via written ruling on March 18, 2019. RCRC is an association of thirty-seven rural California counties, and its Board of Directors is comprised of elected supervisors from those member counties. Our comments on these Public Safety Power Shutoff (PSPS) reports are within the context of the amended topics in the Phase 2 scope of this proceeding and are outlined as such.

We appreciate the Assigned Commissioner’s ruling to enter all post PSPS event reports, also called after-action reports, into the record. It is imperative to improve the scrutiny of these reports and allow parties to comment. It is our strong recommendation that all utilities also provide these reports to all local agencies impacted by the PSPS event and these impacted local agencies affected by a PSPS should be able to:

- Receive party status and intervenor compensation;
- Provide their own comments on their PSPS experiences;
- Comment on the utility post-event report, and;
- Make recommendations for the utility to improve its processes.

In turn, utilities should be required to respond to comments and recommendations, including whether the recommendations will be incorporated for future events and an explanation for why any recommendation will not be incorporated. Additionally, utilities should be required to specify in the report the number of hours in advance the warning was given to each public safety, local government, and critical infrastructure contact and to disclose the number of customers and critical facilities provided with less than two-hours advanced notice of a PSPS event.

In the Wildfire Mitigations Plan Rulemaking (R. 18-10-007), the CPUC is undergoing an effort to provide clear metrics and templates for IOU’s to move away from a “checklist” approach and to an outcomes-oriented event. The same undertaking needs to be done for PSPS after-action reporting to transition away from providing a mere summary of what happened and delve deeper into providing actual insight into the event. Until then, these reports will remain a lackluster portrayal of pre-planning and actual execution, heightening the need for reasonableness reviews and an Order to Show Cause that the utility should not be sanctioned.

**Updates or changes to existing PSPS guidelines adopted in Resolution ESRB-8 and D.19-05-042 to promote the public safety in advance of the 2020 wildfire season**

Actions should be taken specifically to improve notification and sharing information with local governments, such as providing after-action reports to local governments and affected agencies within 10 business days, just like with the Director of the Safety and Enforcement Division (SED) of the CPUC. In general, there is not enough scrutiny of IOU’s after a PSPS event. The CPUC, therefore, needs to proactively conduct reasonableness reviews after any PSPS event

by any IOU and, if necessary, the CPUC should escalate the reasonableness review to an Order to Show Cause. Without scrutiny, PSPS events will 1) not be an action of last resort, and 2) be an over-relied upon option for IOU's that may have a chilling effect on other proactive safety elements of a Wildfire Mitigation Plan, such as vegetation management and system hardening.

The CPUC should revise Resolution ESRB-8 to remove the statement, "We recognize that it is not practicable to have an absolute requirement that electric IOUs provide advance notification to customers prior to a de-energization event." While the CPUC may dither on how much advance notice should be given, it is wholly unreasonable to not provide any advance notification about these premeditated events. To avoid a larger emergency that PSPS events create, it is entirely practicable that local governments, critical facilities, and vulnerable customers must be given advance notice.

Additionally, the CPUC should do the following:

- Eliminate cumbersome restrictions that inhibit the provision of emergency services by allowing information about medical baseline customers, Access and Functional Needs (AFN) populations, and critical facilities to be shared between utilities and local agencies while maintaining the confidentiality of sensitive information.
  - Prohibit the use of nondisclosure agreements prior to sharing with local agencies information on medical baseline customers, AFN customers, and critical facilities.
  - Generally, require local agencies to maintain the confidentiality of that information, but allow it to be used or disclosed as necessary to plan for, prepare for, or respond to public safety power shutoff events.
- Require advance notification to public safety partners before public notification so locals can prepare for and respond to inquiries from the public.
- Require utilities to share the same maps and information regarding the areas impacted by a PSPS event with public safety partners that they use in internal operations.
- Require utilities to coordinate with local telecommunications providers and emergency response partners to ensure the resiliency of communications systems during a PSPS event.
- Require utilities to work with customers with master meters to obtain contact information about residents served by those meters in order to provide notifications.
- Require utilities to communicate customer notifications through multiple mediums, especially for and tailored to known AFN populations.

- Fully embed local representatives in utility emergency operations centers.
- Ensure utilities have adequate capacity to handle the volume of traffic on websites and call volumes anticipated for a given PSPS event.

It is also crucial to establish clear system restoration goals. Service restoration should be accelerated to an average system restoration of 12 hours after the “all clear” is given. Utilities should be allowed to draw on mutual assistance processes to expedite service restoration where possible, as well as prioritize restoration of circuits serving critical facilities and those with high proportions of medical baseline or AFN populations. Utilities should also be required to promptly notify local governments as service is incrementally restored.

### **Operations and location of Community Resource Centers during PPS events**

Unfortunately, Community Resource Centers (CRCs) have been too few in number, too far from residents, open too few hours, and sometimes delayed in opening during PPS events. To mitigate the impacts of the week of October 7<sup>th</sup> event that shut off power to over 700,000 customers (over 1.5 million people), PG&E set up 33 CRCs across 33 counties. PG&E doubled the number of CRCs set up to mitigate the impact of the much larger events reported October 26<sup>th</sup> and 29<sup>th</sup> that impacted over 900,000 customers (over 2 million people); however, that is still a ratio of one CRC per over 25,000 residents. Failure to plan ahead and properly coordinate with local governments led to significant delays in opening many CRCs. Furthermore, most of those CRCs were only open from 8:00 a.m. to 8:00 p.m. and therefore could not serve customers dependent upon electricity to recharge medical devices with a battery life of less than 12 hours. Sonoma County’s experience is even bleaker, as 185,000 residents were evacuated in response to the Kincade Fire, which may have been caused by a PG&E transmission line that was not deenergized. For many residents living in Western Sonoma County whose electricity and gas were both shut off, the nearest CRC was nearly an hour away. This was an inadequate response to the large-scale PPS events in Fall 2019.

Specifically, the following could expand access and services to CRCs:

- Require utilities to coordinate in advance with local governments to identify sites for community resource centers and the level of services that will be available at those centers.

- Require standing contracts to be executed in advance to ensure that CRCs can be opened quickly when needed.
- Require the utility to ensure that the CRCs can provide the services and supplies required by medical baseline and AFN populations as suggested by the respective local government.
- Require the utility to work with the impacted local government to identify the CRC to be opened from the prepared list of facilities
- Ensure that the CRC is open 24 hours a day from the beginning of the PSPS event until the final service restoration.
- Allow local governments to site and operate community resource centers and require the utility to reimburse the local government for costs incurred in setting up and operating the CRC.
- Require the utility to establish one CRC for each 5,000 residents impacted, either itself or through reimbursement of local governments. Require CRC siting to reflect the geographic distribution of residents impacted by the PSPS.

**Plans to better execute identification, communication, and contact with vulnerable populations that may not be considered medical baseline customers**

It is imperative to improve notification and mitigate detrimental impacts PSPS events have on medical baseline and AFN populations. The CPUC should consider actions to:

- Modify Senate Bill 167 (Dodd) of 2019’s requirement for utilities to mitigate the impacts of de-energization on medical baseline “customers” to additionally include mitigation of impacts on all persons who rely upon “life-support equipment, as defined in PUC Section 739(c)(2),” including those who live within a facility served by a master meter.
- Require the CPUC to direct utilities to expand the list of medical baseline and AFN populations that require advanced warning of PSPS events by:
  - Working with willing community-based organizations that serve AFN individuals to identify those who need advanced warning.

- Surveying customers (and residents who live in units served by a master meter) to determine whether the individual uses “life-support equipment, as defined in PUC Section 739(c)(2)” or has another reasonable need for receiving advanced warning.
  - Accepting and incorporating lists voluntarily submitted by local agencies of those residents who meet the requirements above.
- Allow self-identification as an AFN customer for purposes of receiving advanced notification of PSPS events.
- Require the CPUC to direct utilities to provide backup equipment, battery storage for devices, or transportation and lodging resources for people within the footprint of a PSPS that are disabled or who rely upon “life-support equipment.”
  - Require utilities to enter into MOUs with paratransit and other transportation providers to provide non-emergency transportation, at the utility’s expense, for customers who need it, including isolated elderly who are dependent on durable medical equipment or life support equipment and cannot get to CRCs or other locations without assistance.
  - Provide lodging resources for those who need to temporarily relocate to a hotel with power to operate their medical devices.
- Require utilities to identify independent living facilities, assess the ability of each facility to maintain operations during de-energization events of varying length, and to help assess the need for backup generation at those facilities.

### **III. Conclusion**

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

Dated: January 6, 2020

Respectfully submitted,

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