January 22, 2020

The Honorable Scott Wiener
Member, California State Senate
State Capitol, Room 5100
Sacramento, CA 95814

RE: Senate Bill 378 – SUPPORT
As Amended January 21, 2020

Dear Senator Wiener:

On behalf of the Rural County Representatives of California (RCRC), I am writing to express our support for your Senate Bill 378, concerning public safety power shutoff (PSPS) events. RCRC is an association of thirty-seven rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from those member counties.

RCRC member counties have suffered the lion’s share of destruction caused by catastrophic wildfires over the past decade and experienced most of the state’s PSPS events. We do not underestimate the risk of wildfire danger and appreciate the role that expertly-informed, tailored PSPS events play in avoiding catastrophic wildfires like the one that devastated the town of Paradise; however, PSPS events alone are not a panacea for preventing wildfire events during high risk conditions. We remain deeply concerned that the current notification and execution of PSPS events and subsequent restoration of power unnecessarily endangers lives and property and the operation of critical infrastructure. Furthermore, PSPS events can have debilitating economic consequences in many of our communities, where small businesses and low-income residents are least able to cope with the losses.

SB 378 makes a number of changes to increase disclosure of electrical system infrastructure needs and to improve the implementation of PSPS events, evaluate their impacts, and compensate individuals and local governments for associated losses. Furthermore, the bill will incentivize well-constructed, surgical PSPS events that are no larger than necessary to avoid wildfire risk.
RCRC acknowledges that the Pacific Gas and Electric Company’s electrical transmission and distribution system is in serious need of maintenance and system upgrades to improve resiliency and reliability. As such, we support your efforts to shed more light on the age and condition of electrical system infrastructure and the frequency of inspections and maintenance activities.

The loss of electricity can have paralyzing impacts on rural communities, both with respect to economic losses from spoilage and lost productivity and from increased labor and capital costs associated with local efforts to ensure that critical facilities and infrastructure remain operational during a PSPS event. These costs are often compounded by the frequency and duration of PSPS events and are exacerbated when communities lose communications capabilities. One recent analysis indicates that Sonoma County’s PSPS related losses exceeded $100 million. Given these costs, RCRC appreciates and supports SB 378’s requirement for the California Public Utilities Commission (CPUC) to establish a procedure for the compensation of customers and local governments for costs accrued during PSPS events. We also believe that establishing a penalty for a utility’s failure to act reasonably and prudently in implementing and executing a PSPS event will incentivize well-constructed, surgical PSPS events and guard against utilities unnecessarily shutting off power.

Finally, we appreciate requiring the CPUC to evaluate the economic, environmental, public health, and public safety impacts of PSPS events so that we can better evaluate their role in wildfire avoidance.

For these reasons, we support your SB 378. If you should have any questions, please do not hesitate to contact me at jkennedy@rcrcnet.org or (916) 447-4806.

Sincerely,

John Kennedy
Legislative Advocate

cc: Members of the Senate Appropriations Committee
Consultant, Senate Appropriations Committee