March 6, 2020

The Honorable Shirley Weber
Chair, Assembly Budget Subcommittee
No. 5 on Public Safety
State Capitol, Room 6026
Sacramento, CA 95814

RE: Governor’s Office of Emergency Services Community Power Resiliency Budget Change Proposal - SUPPORT

Dear Assembly Member Bloom:

On behalf of the Rural County Representatives of California (RCRC), I offer RCRC’s support for the Governor’s Office of Emergency Services (OES) Community Power Resiliency Budget Change Proposal (BCP) (0690-049-BCP-2020-GB). RCRC is an association of thirty-seven rural California counties and the RCRC Board of Directors is comprised of an elected supervisor from each of the 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; however, PSPS events can have debilitating consequences in many of our communities, where local governments are often least able to shoulder the additional costs and lost revenues.

RCRC appreciates last year’s allocation of grant funding to counties to partially offset unanticipated PSPS-related costs; however, much more assistance is needed. RCRC supports this BCP’s request of $50 million to “bolster community resiliency…in response to investor-owned utilities (IOU) expanded use of power shutoff events.” There are many critical facilities and infrastructure that need assistance to ensure their

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1 Defined by the CPUC to include those facilities and infrastructure that are essential to public safety and require additional assistance and advanced planning to ensure resiliency during a de-energization event. Critical facilities and infrastructure includes police stations, fire stations, emergency operation centers, schools, jails, prisons, public health departments, medical facilities (including, but not limited to hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers, and hospice facilities), facilities involved in the pumping, treatment, distribution, storage, or delivery of water or wastewater, communications carrier infrastructure (including, but not limited to selective routers, central offices, head ends, cellular switches, remote terminals, and cellular sites)
continued operation during a power outage. We agree with OES that additional facilities, like state fairgrounds, county elections offices, and food storage reserves play crucial roles in local resiliency efforts and yet may lack the backup power necessary to serve that purpose. As such, we support state investments in those facilities to enhance local resiliency.

RCRC supports establishing a $50 million community resiliency grant program; however, its effectiveness will be highly dependent on whether the program is structured correctly. We offer the following suggestions to ensure program effectiveness:

**Do not impose a local match requirement.** Local match requirements regressively impact under-resourced communities. We fear that imposing a local match component (as contemplated in the 2020-21 Budget Summary document) will preclude many of the state’s poorest counties and communities from accessing the fund. Many rural jurisdictions are economically disadvantaged, lack the resources to provide whatever local match may be required, and bore a disproportionate share of recent PSPS events.

**Ensure the timely award and distribution of grants.** It is imperative that the program quickly select awardees and disburse funding so that projects can be completed before the 2020 PSPS season begins.

**Establish a state pool of emergency backup generators that can be deployed in an emergency.** There are many smaller critical facilities that lack emergency backup generation because they may lack the resources to procure a generator, including smaller water systems and fire departments. Furthermore, there will always be a small universe of smaller facilities whose backup generators will fail during an emergency. To protect against a loss of essential services, RCRC suggests that the Office of Emergency Services acquire a small pool of emergency backup generators that can be requested by small critical facilities (state small water systems, community water systems, noncommunity water systems, wastewater systems, fire departments, etc.) or by other critical facilities whose backup generator fails during a PSPS event or other emergency.

**Ensure that electrical panel upgrades are eligible for funding.** Recent PSPS experiences demonstrated that many existing facilities need electrical panel upgrades in order to hook up and run off emergency backup generators. Electrical upgrades can be performed well in advance of the acquisition of backup generation and can be standalone projects or combined with the procurement and installation of backup generation. Providing funding for electrical panel upgrades is a cost-effective pathway to significantly improve resiliency because it avoids lengthy delays associated with performing that work during an event. Furthermore, funding electrical panel upgrades will help ensure that critical facilities and infrastructure can quickly utilize backup power supplies that are available on the rental market or that may be available through the state pool suggested above.
Please do not hesitate to contact me if you should have any questions or concerns regarding RCRC’s recommendations on this item.

Sincerely,

JOHN KENNEDY
Legislative Advocate

cc: The Honorable Philip Ting, Chair, Assembly Budget Committee
Members of the Assembly Budget Subcommittee No. 5 on Public Safety
Jennifer Kim, Consultant, Assembly Budget Subcommittee No. 5 on Public Safety
Daryl Thomas, Consultant, Assembly Republican Caucus