

**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 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 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 the *Assigned Commissioner’s Phase 3 Scoping Memo and Ruling* from Assigned Commissioner Marybel Batjer issued on February 19, 2021; the due date of these comments was extended per a procedural email by ALJ Poirier on March 2, 2021. 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 one elected supervisor from each of those member counties. RCRC member counties comprise the vast majority of the state’s forested lands and high fire hazard severity zones. As such, our communities have suffered much of the destruction caused by high severity wildfires and experienced most of the state’s Public Safety Power Shutoff (PSPS) events.

We are pleased to support the suggested refinements and additions to the PSPS guidelines outlined in the *Phase 3 Scoping Memo and Ruling*. At the same time, we note that Decision 20-

05-051 identified an important objective for the future scope of this proceeding, such as creating one primary authority for de-energization guidelines and directives. Specifically:

*“The Commission acknowledges that there are multiple authorities, including multiple Commission decisions and resolutions, that provide guidelines and directives to the electric IOUs regarding de-energization events that are initiated to mitigate the risk of catastrophic wildfires. The Commission will leave this rulemaking open to **pursue a third phase that will develop a general order that will codify the guidelines and directives contained in this decision and previous authorities. The purpose of developing this general order will be to have one primary authority that provides guidelines and/or directives to the electric IOUs** regarding de-energization events that are initiated to mitigate the risk of catastrophic wildfires.”¹ [Emphasis added]*

While we support the changes proposed in Track 3, we note and are disappointed that it is unclear how or when the CPUC will consolidate the PSPS guidelines into one overarching general order. As we have previously suggested², the CPUC and all stakeholders would significantly benefit from the clarity associated with consolidating all of the de-energization guidelines found in Resolution ESRB-8, Decision 19-05-042, D.20-05-041, and the decision resulting from this phase of the proceeding into a single general order.

A. Community Resource Centers (CRCs)

- 1. Each electric investor-owned utility must update and finalize its CRC plan (for both fixed facility and mobile locations) for inclusion in its pre-season report.*

RCRC agrees that CRC plans should be updated between PSPS “seasons” and that a pool of potential CRC locations should be finalized as early as possible for inclusion in that pre-season report. Early planning and coordination can minimize confusion for all stakeholders and ensure that the utilities and stakeholders can quickly and nimbly respond to any problems that arise as the year progresses.

- 2. Each electric investor-owned utility must coordinate in advance with local and tribal governments to (a) identify sites for CRCs, (b) the level of services that will be available at those centers, and (c) execute standing contracts in advance to ensure that CRCs can be opened quickly.*

RCRC strongly agrees that coordination between utilities and local governments is key to ensuring the effectiveness of CRCs and that they are able to mitigate the impacts of PSPS events to the greatest extent feasible. We have highlighted this need throughout this proceeding and

¹ Decision Adopting Phase 2 Updated and Additional Guidelines for De-Energization of Electric Facilities to Mitigate Wildfire Risk, June 5, 2020, Page 75.

² *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.

appreciate the Commission’s attention to the issue.³ Without such coordination, CRCs may be ineffective because they are too few in number, located in remote or inaccessible locations, fail to provide the types of services needed, or are located in outdoor tents during periods of extreme heat or poor air quality.⁴ Local governments can help identify sites, determine appropriate levels of services, and create a pathway to quickly open these centers during extreme and rapidly changing weather events.

We reiterate that that the required hours of operation established in D. 20-05-051 (8AM-10PM during an active deenergization event) may be insufficient to meet the needs of medically sensitive residents who need to recharge their medical devices during the evening hours. If there are insufficient efforts to mitigate PSPS impacts on individuals, “early closure of a CRC [may] leave[] those individuals with little choice but to go to facilities open during the night where they can access electricity – oftentimes a hospital or emergency room. While the utilities have increased their coordination with community based organizations to mitigate the impacts of PSPS events on medically sensitive residents, it is not clear whether those efforts are sufficient and whether certain individuals or areas are falling through the cracks.”⁵ At the same time, we note that other changes suggested in these Phase 3 guideline modifications that require utilities to provide backup batteries may help mitigate those concerns where such batteries are readily available.

We appreciate the CPUC’s direction that utilities execute standing contracts with local and tribal governments to ensure that CRCs can be opened quickly. Local and tribal governments operate many facilities that are well-suited for use as CRCs during PSPS events. However, we also note that the utilities may wish to contract with non-governmental organizations to stand up CRCs during a PSPS event. To address that concern, we caution against phrasing A.2.(c) in such

³ *Rural County Representatives of California Comments on PG&E’s Post-PSPS Event Report For October 10, 2019, October 25, 2019 and November 8, 2019*, filed January 6, 2020, page 6; *Rural County Representatives of California Comments on Proposed Additional and Modified De-Energization Guidelines*, February 19, 2020, page 6-7; *Comments of the Rural County Representatives of California on the Safety and Enforcement Division Report*, October 5, 2020, page 6; *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 12-13.

⁴ *Rural County Representatives of California Comments on Proposed Additional and Modified De-Energization Guidelines*, February 20, 2020, page 7 states, “CRCs should be operated to meet the needs of the community by providing hygiene facilities and space for resting if power is anticipated to be shut off for extended periods of time (e.g. in excess of 12 hours) or for back-to-back PSPS events. Furthermore, CRCs should... meet the power needs of access and functional needs residents to support the use or recharge of medical devices.”

⁵ *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, page 13.

a way that would preclude utilities from executing standing contracts with entities other than local or tribal governments. The emphasis should be on executing standing contracts so that CRCs can be quickly opened during a PSPS event, regardless of who owns the individual facility.

3. *Each electric investor-owned utility must detail in its annual CRC plan how the CRCs will provide the services and supplies required to serve medical baseline and AFN populations as recommended by the respective local governments and health agencies.*

RCRC agrees that utilities should detail how their CRCs will provides the services and supplies recommended by local governments and health agencies for medical baseline and AFN populations. CRCs are a key instrument to mitigate PSPS impacts on customers – especially medically sensitive populations. CRCs are complimentary to utility efforts to provide tailored, individualized mitigation and should fill any gaps that may exist in those mitigation efforts. As such, it is important for utilities to build into their CRC plans the ability for centers to serve medical baseline and AFN populations, as recommended by local governments and health agencies.

4. *Subject to current public health and safety protocols, each electric investor-owned utility must implement only indoor CRCs when the air quality index (AQI) for that area is projected to be or is at or above 101, which is the threshold AQI considered unhealthy for sensitive groups.*

RCRC agrees with and supports this requirement. Some of the first PSPS events in 2020 “occurred at a time of very high temperatures and extremely poor air quality - neither of which can be effectively mitigated by outdoor tents. While we understand the immense challenges COVID-19 is currently placing on our society, dependence on open-air CRCs is not appropriate in a post-COVID-19 world, especially during extreme weather events and when air quality is poor. These are the types of scenarios when using climate-controlled facilities with air filtration systems is especially important for many of the residents who utilize CRCs.”⁶

5. *Subject to current public health and safety protocols, each electric investor-owned utility must establish 90% of its CRCs for indoor use, unless the AQI is projected to be or is at or above 101, in which case 100% of CRCs must be for indoor use.*

RCRC agrees with and supports this requirement for the reasons stated above.

6. *Each electric investor-owned utility must make all CRC-location information publicly available and easily accessible on its respective de-energization webpage at least 24 hours before deenergization.*

RCRC supports this and suggests including the information in customer notifications.

⁶ *Id.*, at page 12-13.

B. Critical Facilities and Infrastructure

- 1. Each electric IOU must create a webpage accessible from its de-energization main page that explains the requirements to qualify as a “critical facility” and links the reader to an explanation of the application process to add new critical facilities.*

RCRC appreciates the Commission creating a pathway for entities to engage with their electric utilities and request designation as critical facilities. At the same time, we note this process should be additive to the extensive critical facilities database that utilities already maintain. Considering that the SED Report⁷ observed numerous instances of discrepancies between utility and local government lists of critical facilities and situations in which critical facilities were not notified in advance of PSPS events, this should be done after utilities reconcile their lists of critical facilities with local governments to ensure the accuracy of those databases.⁸

We suggest the Commission require the pre-season report to include the number of critical facility requests received over the previous year, status of those requests, and reasons for denial.

- 2. Each electric IOU must provide a critical facilities plan in its pre-season report.*

RCRC appreciates the focus on critical facilities and the need to conduct pre-season planning, but are confused by the focus of this plan. We suggest outlining the Commission’s expectations, which should include a process for regular reconciliation of critical facility lists. That report should also include an annual update on the utility’s efforts to “proactively partner with critical facility and critical infrastructure representatives to assess the ability of each critical facility to maintain operations during de-energization events of varying lengths... [and] help critical facility and critical infrastructure representatives assess the need for backup generation and determine whether additional equipment is needed, including providing generators to facilities or infrastructure that are not well prepared for a power shut off” as required under D. 19-05-042.

C. De-Energization Exercises

- 1. The existing guideline requiring each electric investor-owned utility to plan de-energization simulation exercises is modified to require such plan to be included in the utility’s pre-season report.*

RCRC supports this requirement. Notwithstanding our support, this type of modification to existing guidelines highlights the need to consolidate all of these PSPS guidelines into a single

⁷ Safety and Enforcement Division’s (SED) *Public Report on the Late 2019 Public Safety Power Shutoff Events*, April 30, 2020.

⁸ *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, page 8.

document so the regulated community and stakeholders all have a clear and easily discernible understanding of what is required.

2. *Each electric investor-owned utility must conduct deenergization simulation exercises no later than 60 days after the issuance of the Phase 3 final decision, then again at least annually by July 1 using the same channels of decision-making, knowledge transfer, implementation, and communication that would be used in the event of a de-energization.*

RCRC supports the concept of de-energization simulation exercises; however, it is unclear if this guideline modifies, replaces, or adds to existing requirements for simulation exercises.

D. Definitions

1. *“Before re-energization begins” refers to the point in time after the patrol inspection of the line is complete.*

For greater clarity, the definition should be revised as follows:

“Before re-energization begins” refers to the point in time after the patrol inspection of the line is complete **and determined safe to restore power.**

2. *Concurrent Emergency: A de-energization event overlapping with a wildfire event.*

While we appreciate the Commission recognizing that there may be concurrent emergencies that overlap with de-energization events, we caution against limiting the scope of the definition to only include wildfires. There are many other types of emergencies that might arise during an ever-lengthening PSPS-season, including air pollution, floods, epidemics, riots, earthquakes, etc. Concurrent emergencies are unpredictable as to their nature and the risks involved – this is why the California Emergency Services Act was written to encompass a broad array of emergencies for which the Governor or local governments can proclaim a state of emergency.

3. *Critical Facilities is further defined to include:*
 - a. *Emergency Services Sector*
 - i. *Tribal government providers.*
 - b. *Government Facilities Sector*
 - i. *Homeless Shelters supported by federal, state, or local, or tribal governments;*
 - ii. *Community Centers;*
 - iii. *Senior Centers;*
 - iv. *Temporary facilities established for civic participation (voting centers or vote tabulation facilities).*
 - c. *Healthcare and Public Health Sector*

- i. *Cooling (or Warming) Centers designated by state, or local or tribal governments;*
 - ii. *Temporary facilities established for public health emergencies.*
- d. *Food and Agriculture Sector*
 - i. *Emergency Feeding Organization as defined in federal code, 7 U.S.C. § 7501; a public or nonprofit organization that administers activities and projects (including the activities and projects of a charitable institution, a food bank, a food pantry, a hunger relief center, a soup kitchen, or a similar public or private nonprofit eligible recipient agency).*

RCRC appreciates the Commission’s modest expansion to the definition of critical facilities and infrastructure. We support the inclusion of food banks, local cooling/warming centers, community/senior centers, homeless shelters, and voting centers/tabulation facilities. RCRC has long urged the Commission to include food banks and elections operations. “Designation is important not only because of the advanced notification of PSPS events, but also because the utility must assess the ability of that facility to maintain operations during de-energization events of varying lengths.”⁹ Due to the critical services provided by these types of facilities, and the magnitude of the consequences if any of those operations should lose power, we believe their addition to the definition is very important.

- 4. *False-negative communications are those conveying that a deenergization event will not occur, when de-energization does occur. False-positive communications are those conveying that a deenergization event will occur, when de-energization does not occur.*

RCRC agrees with the inclusion of these definitions.

- 5. *Public Safety Partner is further defined to include cities and all levels of local and tribal government.*

RCRC agrees with this definition and appreciates its inclusion.

E. Education and Outreach

- 1. *Each electric investor-owned utility must conduct public outreach, in all languages prevalent in its respective service territory, to communities in collaboration with relevant Community Based Organizations (CBOs) and public safety partners. Outreach must include after-event surveys and metrics to evaluate whether the awareness and outreach is helping communities and residents before, during, and after*

⁹ *Id.*, at, pages 8-9; and *Rural County Representatives of California Comments on Proposed Additional and Modified De-Energization Guidelines*, February 19, 2020, pages 11-12.

a de-energization event. Each electric investor-owned utility must report the survey results and metrics in its quarterly de-energization progress reports.

RCRC appreciates the inclusion of after-event outreach surveys as a measurement tool and inclusion of such feedback in de-energization progress reports. While public safety partners are happy to help participate in the surveys, it may be difficult for many of those entities to actively participate in conducting public outreach and surveys, as seems to be contemplated by the Commission, given limited resources and other pressing public safety responsibilities.

F. Emergency Operations Centers (EOCs), State Operations Center, Liaisons

- 1. All electric investor-owned utility EOC staff must have emergency management experience or receive emergency management training. Emergency management expertise is necessary to communicate effectively, accurately, and consistently with public safety partners before, during, and after a de-energization event.*

RCRC supports this requirement to improve the effectiveness of utility EOCs and situational response.

G. Medical Baseline and Access and Functional Needs (AFN) Communities

- 1. The following groups must be included in each electric investor-owned utility's identification efforts, in addition to the existing requirement for each such utility to "identify, above and beyond those in the medical baseline population: Persons reliant on electric life-sustaining equipment, persons eligible for the medical baseline program."*

RCRC strongly supports requiring utilities to identify and reach out to those persons "reliant on life-sustaining equipment" and those eligible for the medical baseline program.

- 2. Each electric investor-owned utility must build partnerships with CBOs and healthcare providers, including but not limited to, those from county-level health and human services departments, public health departments, healthcare facilities, and clinics, to lessen the impact of de-energization events, and to improve outreach and assistance for AFN communities, and medical baseline eligible customers.*

RCRC appreciates requiring utilities to build partnerships with community-based organizations, healthcare providers, and county-level health and human services departments. As we previously observed: "We note (and greatly appreciate) that the utilities have already made great strides in contracting with community-based organizations to provide goods and services to at-risk individuals to mitigate PSPS impacts. Less clear is whether those organizations can fully satisfy customer demand before the allocated resources are exhausted. While utilities are tapping into a large network of organizations, it is not clear if any communities remain unserved by that

network or if individuals have fallen through the cracks and been unable to obtain mitigation assistance.”¹⁰ We believe that building better partnerships with local healthcare providers and governmental agencies will help fill some of the gaps that may exist in the areas or populations served by those CBOs with whom the utilities currently have partnerships.

3. *Each electric investor-owned utility must use its own list(s) of customers in groups subject to identification efforts and work with CBOs that conduct outreach in these AFN communities to identify customers who reside in multi-family buildings and rely on elevators to access or leave their residence. Each electric investor-owned utility must include its list in its pre-season report.*
 - a. *Each electric investor-owned utility must contact the building manager of the building(s) identified herein in preparation for wildfire season to ensure such facilities: 1) have forewarning, and 2) discuss backup generation resource options. Each utility must additionally notify these building managers prior to conducting a deenergization event.*
 - b. *Each electric investor-owned utility must provide information to paratransit agencies serving all the tenants of the buildings identified herein should any tenant need access to a community resource center during a deenergization event.*

RCRC supports these efforts to protect those individuals who have mobility impairments and rely on elevators to access their dwellings in multi-family buildings. As many have noted, medically sensitive and elderly Californians who live in multi-level multi-family buildings are at greater risk of adverse PSPS impacts because of mobility challenges. We believe that requiring utilities to proactively reach out to building managers and paratransit agencies will help to avoid many of those challenges. While such a requirement may be challenging to implement, we note that the power to shut off electricity for comes with a tremendous responsibility to protect those residents who are adversely impacted by those actions. Furthermore, we hope that the ultimate goal is to improve electrical system resiliency so electrical disruption is ultimately unnecessary to reduce the risk of utility-caused wildfire.

While we support these efforts, we still remain concerned about the lack of specificity of what constitutes advance notice of a deenergization event, as discussed below. We understand the challenges posed by rapidly changing extreme weather events, but without clear expectations, there is little incentive for utilities to ensure that all customers are timely notified.

¹⁰ *Comments of the Rural County Representatives of California on the Safety and Enforcement Division Report*, October 5, 2020 pages 5-6; and, *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, 10.

4. *Each electric investor-owned utility must launch a program to support resiliency for customers that rely on medical equipment to sustain life, by providing them free backup batteries that energizes such medical equipment for at least six hours. This shall be reported in progress reports and post-season reports.*

RCRC supports this requirement. As we previously noted, “To protect our most vulnerable residents, we urge the Commission to devote greater attention to mitigating the impacts of PSPS events on medical baseline and medically sensitive customers. While advanced notifications for medically sensitive residents are absolutely necessary, notifications alone fail to protect those individuals from adverse PSPS-related impacts. Much of the existing focus has been on notification and urging medically sensitive residents to have a plan in place in case their power is shut off during a PSPS event. This ‘hands-off’ approach inappropriately places unnecessary burdens on customers who often lack the resources to adequately prepare for losing electricity, particularly those customers who depend on electric-powered medical equipment.”¹¹

We acknowledge the significant progress utilities have made in working with CBOs to help mitigate PSPS impacts for medically sensitive residents. We believe that this requirement is complimentary to those efforts and should help to reduce impacts associated with individuals going to emergency rooms and healthcare facilities to power their devices during PSPS events. Such assistance will also alleviate some of the need for CRCs to operate during nighttime hours.

We support the provision of free backup batteries to power medical equipment; however, we note that a six-hour duration may be inadequate for residents who lose power during multi-day PSPS events. Utilities should take care to ensure that the batteries deployed are regularly replaced or recharged to ensure that the medically sensitive resident maintains continuous access to electricity to power their medical devices.

H. Mitigation

1. *Each electric investor-owned utility must evaluate the impact of de-energization on transmission; evaluate how to mitigate and prepare for those impacts; include this evaluation in its post-event report.*

RCRC supports greater planning and mitigation in an effort to reduce the size, scope and duration of PSPS events. We urge the Commission to focus greater attention on “ensur[ing] that utility investments in hardening and resiliency are directed to those circuits at greatest risk,”

¹¹ *Comments of the Rural County Representatives of California on the Safety and Enforcement Division Report, October 5, 2020 page 10.*

requiring utilities to outline planned efforts to reduce the risk of deenergizing those circuits, and fully mitigate the impacts of PSPS events in those areas.¹²

I. Notification

1. *Each electric investor-owned utility must ensure that the public is able to access precise locality information of potential and active de-energization events. Each electric investor-owned utility must make every reasonable effort to avoid false-negative and false positive communications.*

RCRC supports the provision of granular location data to ensure that the public can accurately determine the scope of a PSPS event. This information will help local first responders and critical facilities make adequate preparations and deploy resources where necessary to mitigate harm. This information will also help members of the public determine if their family members may be impacted by a PSPS event, which is extremely important for those areas where the loss of power impacts the reliability of communications systems. We acknowledge and sincerely appreciate the extensive efforts the Commission has made to improve the resiliency of communications systems, but acknowledge that those changes will take time to implement.

2. *Each electric investor-owned utility must make every attempt to provide notification of the cancellation of a de-energization event, or removal from scope, by notifying all affected entities, including the public safety partners, within two hours of the decision to cancel.*

We understand the challenges of predicting extreme weather patterns and support requiring utilities to quickly notify impacted customers and public safety partners after the decision to cancel or reduce the scope of a PSPS event.¹³ Many residents, critical facilities, and public safety partners make difficult decisions to prepare for a PSPS event and timely notification of a cancellation or change in scope will help those customers change their schedules or redeploy resources to areas that remain within the scope of the event. We believe that a two-hour deadline is reasonably achievable for the utility.

3. *Each electric investor-owned utility must develop a notification plan jointly with Cal OES, public safety partners, county, tribal, and local governments, independent living centers, paratransit agencies, and representatives of all subsets of people or*

¹² *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 5-6.

¹³ *Id.*, pages 4-5.

communities with access and functional needs. Each electric investor-owned utility must finalize its notification plan in its pre-season report.

RCRC supports creation of an open, collaborative dialogue leading up to preparation of a utility's notification plan; however, we reiterate that the utility should "retain the ultimately responsibility" for providing notifications, as outlined in D. 19-05-042, since the utilities have the most knowledge of and jurisdiction to call a de-energization.¹⁴

4. *Each electric investor-owned utility must update its notifications uniformly across platforms, for example, public facing notifications should be updated as soon as portal notifications are updated so that customers obtain the same information regardless of how they receive or source the information.*

RCRC supports this requirement for utilities to update their notifications uniformly across platforms, as different customers have different methods of obtaining information and disharmony would significantly increase customer confusion.

5. *Each electric investor-owned utility must update public facing notifications immediately after private notification to Public Safety Partner emergency managers. Such notifications must be coordinated, consistent, and transparent.*

RCRC supports priority notifications to public safety partners and local emergency managers. We agree it is appropriate to subsequently convey that updated information through public facing notifications without delay. Eliminating the public lag-time will reduce pressure on public safety partners and minimize confusion.

6. *To the extent feasible, prior to de-energization, each electric investor-owned utility must provide, in a standardized format, notices to public safety partners containing the following information:*
 - a. *Consolidated lists of impacted meter information, device information, and address information;*
 - b. *Estimated time intervals for de-energization, reenergization, and "all clear" notices;*
 - c. *Links to corresponding information in electric investor-owned utility portals; and*
 - d. *Maps and shapefiles with each notice from the outset (i.e., from the 72-hour notice through the restoration of service).*

RCRC believes that providing this information to public safety partners before a deenergization event will be helpful. As such, we support the proposed guideline changes. At the

¹⁴ Page A9.

same time, we remain concerned that the existing notification guidelines are “recommendations” and stop short of establishing requirements for pre-event customer notifications. Rather than being required to notify customers of a potential PSPS event so many hours in advance of the event, the guidelines merely ask utilities to provide notifications where feasible, thereby creating loopholes at the customers’ [and public safety partners’] expense. While we understand 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.¹⁵

J. Reporting

1. *All reporting plans concurrently required to be included in the pre-season report herein, must be produced in a single document submitted by each electric investor-owned utility.*

We agree with this requirement, but note that the disjointed nature of having requirements located in (and modified by) four separate decisions lends to the argument that all of these guidelines need to be reconciled in a separate standalone order.

2. *In its post-event reports, each electric investor-owned utility must provide:*
 - a. *Circuit-by-circuit analysis of mitigation provided from backup power and microgrid pilots, including history of deenergizations for each circuit for the preceding two-year time period.*
 - b. *The number of customers notified in comparison to the number of customers de-energized. This information must be provided both via a map or maps and data table(s) that readily enable comparison on the same scale.*

RCRC strongly supports requiring post-event reports to include a circuit-by-circuit analysis of mitigation efforts and historic deenergization events.

As previously mentioned, RCRC believes that utilities should focus resources on those circuits at greatest risk of repeated PSPS events. Utilities should improve infrastructure so that PSPS events can be phased out on those circuits and customers will not lose power. Including the history of de-energizations for each circuit will illuminate neighborhoods and communities that may be disproportionately affected by insufficient grid hardening and circuit sectionalization measures. At the same time, only requiring information on deenergizations over the previous two years is too short of a time horizon. *We suggest* striking the clause “for the preceding two-year time period” from the requirement.

¹⁵ *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, page 7.

RCRC also supports greater specificity on the types of mitigation efforts provided to deenergized circuits. We think this should be blended with a requirement for utilities to include information in their post-season reports about the “steps they will take to reduce the risk of deenergizing those circuits (including through system hardening, sectionalization, or deployment of microgrids), an estimated time to complete those projects, and explain how they are building local resiliency and mitigating effects in impacted communities in the interim.”¹⁶

3. *Each electric investor-owned utility must file a comprehensive post-season report annually, no later than January 31. The report must follow a template provided by SED no later than 60 days after the issuance of the Phase 3 final decision. The post-season report must include, but will not be limited to:*
 - a. *Implementation of all applicable guidelines and requirements imposed by the Commission;*
 - b. *Statistics and data;*
 - c. *Status of all electric infrastructure projects (planned, in progress, or complete) related to mitigating impacts of deenergization events, such as sectionalization, microgrid installations, system hardening, situational awareness, lessons-learned in the previous year, and the resulting impacts, if any, on the size and scope of each deenergization event; and*
 - d. *Program information about the provision of free, two-hour backup batteries to support resiliency for critical care customers that rely on medical equipment to sustain life.*

RCRC supports comprehensive, standardized post-season reporting. Annual post-event reports “can paint a better picture of the utility’s progress in reducing the size, scope, and frequency of PSPS events and mitigating their impacts.”¹⁷ These reports should not only recap the experiences of the previous year, but also put them in a historical perspective by comparing them to previous years. The reports should require utilities to annually report information on those circuits at greatest risk of being deenergized during a PSPS event and outline planned efforts to mitigate those risks.

As we previously suggested, “utilities should annually provide data on the number of times individual circuits were deenergized. Based on that information, utilities should describe steps they will take to reduce the risk of deenergizing those circuits (including through system hardening, sectionalization, or deployment of microgrids), an estimated time to complete those

¹⁶ *Id.*, pages 5-6.

¹⁷ *Id.*, page 6.

projects, and explain how they are building local resiliency and mitigating effects in impacted communities in the interim.”¹⁸

We support requiring recaps of utility efforts to provide backup batteries to support critical care customers that rely on life-sustaining medical equipment, but suggest a few changes to improve the meaningfulness of that information. In particular, we suggest the report also include information on other types of assistance provided to mitigate PSPS impacts for those customers. The report should also estimate of the number medical baseline and/or medically sensitive customers impacted and who did not receive any mitigation assistance other than notification¹⁹ and any communities or areas that are not served by utility partnerships with CBOs that provide such assistance. Finally, we note that the proposed guideline suggests providing data on the provision of free two-hour backup batteries; however, other proposed guideline changes require utilities to launch programs to provide free backup batteries that energize medical equipment for at least six hours. Given the short lifespan of those backup batteries, the utilities should also report on how often they replaced or recharged those batteries during a given PSPS event.

In sum, the overarching goal of the post-season reports should be to measure compliance with the guidelines and progress towards reducing the size, scope, duration, and frequency of PSPS events. Between the common reporting template and provision of historic information, these post-season reports will help both the Commission and stakeholders track utility progress on those overarching goals.

III. Conclusion

RCRC commends the Commission for its continued interest in ensuring that PSPS events are well executed and that their impacts are mitigated for critical facilities and sensitive populations. While the number of residents and communities impacted by PSPS events fell sharply from over two million in 2019, last year’s PSPS events still left hundreds of thousands of Californians without electricity for extended periods of time. Given the unprecedented size of the 2020 wildfires and worsening drought conditions in our forested areas²⁰, PSPS events will unfortunately continue to greatly impact communities across the state. We believe that the changes

¹⁸ *Id.*, page 4.

¹⁹ *Id.*, pages 5-7.

²⁰ <https://www.drought.gov/states/california>, accessed February 22, 2021.

proposed in this phase of the proceeding will help to improve PSPS execution, reduce confusion, and minimize impacts for affected customers.

We urge the CPUC to direct utilities undertake the infrastructure and resiliency work necessary to ensure that deenergization events become unnecessary to avoid utility caused wildfire in the future. California – the home of technological innovation and the Silicon Valley – cannot have unreliable electrical service. No person is spared from downstream negative consequences that electrical outages bring, including on education and productivity, food spoilage, public health, public safety, and emergency response. Electrical utilities and the Commission should work to continue to reduce, the size, scope, duration, and frequency of PSPS events.

Finally, we strongly urge the Commission to consolidate all previous PSPS decisions and those resulting from this phase of the proceeding into one comprehensive general order. This will greatly reduce confusion and help the utilities and stakeholders better understand the overarching regulatory framework.

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

Respectfully submitted,

/s/ John Kennedy

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