



March 9, 2020

The Honorable Bill Dodd  
Member, California State Senate  
State Capitol, Room 4032  
Sacramento, CA 95814

**RE: Senate Bill 862 – SUPPORT  
As Amended March 6, 2020**

Dear Senator Dodd:

On behalf of the Rural County Representatives of California (RCRC), I am writing to express our support for your Senate Bill 862, 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. 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. PSPS events can have debilitating economic consequences in many of our communities, where local governments are often least able to shoulder the additional costs and lost revenues. Worse yet, PSPS events can endanger the lives of medically sensitive residents unless the impacts are appropriately mitigated.

Senate Bill 862 makes three important changes to mitigate the impacts of PSPS events on local governments and medically sensitive residents. First, SB 862 clarifies that PSPS events qualify as "sudden and severe energy shortages" for which a state of emergency or local emergency can be declared under the California Emergency Services Act. Secondly, SB 862 establishes important baselines for the siting of and services provided by community resource centers (CRCs) to mitigate PSPS impacts on residents. Finally, SB 862 expands the universe of medically sensitive individuals for whom electrical corporations shall develop protocols to mitigate the impacts of PSPS events.

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With respect to clarifying that PSPS events qualify as state or local emergencies under the California Emergency Services Act, RCRC believes that this change is important to provide greater flexibility to local agencies to respond to PSPS events and to seek financial assistance from the state to recover costs associated with those activities. Local governments often have limited resources and last year's PSPS events imposed significant unexpected costs in terms of labor overtime, setting up resource centers, checking on medically sensitive residents, and procuring backup generators to ensure that critical facilities remain operational throughout the event.

RCRC believes that properly sited CRCs that provide appropriate resources to the general public will go a long way to mitigating PSPS impacts on sensitive populations. The CRCs deployed in the 2019 PSPS events were inadequate with respect to the services provided, number of facilities, convenience of facilities, and hours of operation and so RCRC strongly supports SB 862's establishment of baselines for the siting and operation of CRCs.

While we appreciate the steps utilities are taking to improve the accessibility and availability of, and services provided by CRCs, we believe that certain baselines should be established, including that utilities be required to coordinate regarding the location and services provided by CRCs, that CRCs be open 24 hours a day for the duration of a PSPS event, be located at existing fixed facilities (to the maximum extent feasible), and be located within a reasonable distance of the communities intended to be served.

Utilities should generally try to utilize facilities like libraries, community centers, senior centers, sports centers, fairgrounds, and school gymnasiums as CRCs because those types of facilities have the capacity to serve larger populations with a number of different types of resources during an emergency. With respect to the resources available, CRCs should be able to provide far more than just light refreshments and phone charging capabilities. CRCs should be operated to meet the needs of the community by providing hygiene facilities and space for resting if the 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 be well designed so that they can meet the power needs of access and functional needs residents to support the use or recharge of medical devices. Without the ability to provide these services, or without access to CRCs 24 hours a day, our communities have seen a significant surge in utilization of hospital emergency rooms for these types of basic services.

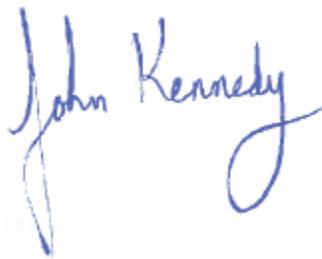
RCRC also supports expanding the universe of medically sensitive individuals for whom electrical utilities should provide mitigation assistance. RCRC strongly supported your Senate Bill 167 of 2019, which required utilities to develop protocols for mitigating PSPS impacts on medical baseline customers. Last year's PSPS event showed that medical baseline programs are undersubscribed and fail to capture the entire universe of individuals whose lives are threatened when they lose electricity. We support SB 862's extension of this assistance to access and functional needs individuals.

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As the bill moves forward, we suggest clarifying the types of mitigation/assistance electrical utilities should have to provide to medical baseline customers and access and functional needs individuals. We appreciate utility efforts last year to provide battery back-up systems and future opportunities to deploy energy storage systems to medically sensitive individuals; however, we also believe that electrical utilities should additionally provide transportation and accommodation for other medically sensitive individuals in situations where their needs may not be met by those devices, where those devices are unavailable, or when their needs cannot otherwise be met by a community resource center.

For these reasons, we support your SB 862 and look forward to discussing other concepts to improve PSPS notification, implementation, and mitigation. If you should have any questions, please do not hesitate to contact me at [jkennedy@rcrcnet.org](mailto:jkennedy@rcrcnet.org) or (916) 447-4806.

Sincerely,



JOHN KENNEDY  
Legislative Advocate

cc: Members of the Senate Energy, Utilities & Communications Committee  
Consultant, Senate Energy, Utilities & Communications Committee  
Kerry Yoshida, Consultant, Senate Republican Caucus