



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

October 17, 2019

Ms. Marybel Batjer  
President  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

Dear President Batjer:

On behalf of the Rural County Representatives of California (RCRC), we want to thank you for your October 14, 2019 letters to Investor Owned Utilities (IOUs) following the largest Public Safety Power Shutoff (PSPS) in California history. We support your outlined directives and believe they are vital to protect public health and safety and avoid unnecessary impacts to Californians. RCRC is an association of thirty-seven rural California counties, and its Board of Directors is comprised of elected supervisors from those member counties.

RCRC's member counties comprise more than 58% of the land mass in California and have a population greater than twenty-four U.S. states. More than 75% of the U.S. Forest Service's land in California is within our jurisdiction. With extensive forested lands, our members have deep expertise on forestry and vegetation management issues. Given that much of the state's high fire hazard severity zones are in RCRC counties, our members have suffered the lion's share of destruction caused by catastrophic wildfires over the past decade and communities within our counties have experienced most of the state's PSPS events.

RCRC has a broad interest in the effective implementation of Senate Bill 901 and Assembly Bill 1054 and has been actively involved as a party in both the Wildfire Mitigation Plans Proceeding (R.18-10-007) and the De-Energization Proceeding (R. 18-12-005). We wholeheartedly agree that the execution of the recent large-scale PSPS event was a failure and share the concerns expressed in your letters. That being said, we do not underestimate the risk of wildfire danger and appreciate the role that expertly-informed, tailored PSPS events could play in avoiding catastrophic wildfires like the one that devastated the town of Paradise. We acknowledge that PG&E's post-PSPS inspections did identify at least 100 instances<sup>1</sup> "of 'damage or hazard' to its infrastructure

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<sup>1</sup> Sacramento Bee, *Called Greedy by Gavin Newsom and others, PG&E defends mass shutoff as 'right call'*

<https://www.sacbee.com/news/california/fires/article236312378.html>

as a result of the windy conditions that prompted the utility to cut power to roughly 738,000 customers” last week, including tree branches that came into contact with or caused distribution lines to fall to the ground in Napa, Shasta, and Glenn Counties.<sup>2</sup> These instances could have potentially caused fire events under the wrong circumstances, and we appreciate that those deficiencies can now be corrected. While the actual cause remains under investigation, the recent Saddleridge Fire in Los Angeles County reportedly began near the base of a transmission tower that was not de-energized during Southern California Edison’s (SCE) recent PSPS event.<sup>3</sup> However, PSPS events alone are not a panacea for preventing wildfire events during high risk conditions.

While we appreciate these risks and acknowledge the role that PSPS events play in their avoidance, we are deeply concerned that the current notification and execution of PSPS events and subsequent restoration of power unnecessarily endanger lives and property and the operation of critical infrastructure. These impacts are even more acute for low-income residents and those who rely on electricity to power medical devices. Furthermore, rural areas are often populated by a higher percentage of elderly persons—many of whom are dependent on fixed incomes—and their local governments may lack the resources to fully mitigate the impacts of PSPS events on critical infrastructure and sensitive populations. Counties operate many critical facilities that pose a danger to public safety should they experience de-energization. When, and if, back-up generation fails, there must be contingency plans in place—such as the potential to evacuate a jail - - which is no small undertaking especially if large swaths of the state concurrently experience a de-energization event like the week of October 7, 2019. With next year’s elections on the horizon, democracy is at stake if there is a PSPS event that would impact voting centers, another effect that has not been properly considered during PSPS discussions. Needless to say, communication and proper planning is key, particularly as we continue to learn more about the potential for profound impacts on California's communities during PSPS events. For these reasons, it is imperative that IOUs work more closely with local government and public safety partners.

RCRC strongly supported a few recently-enacted bills that we believe will help improve community resilience to PSPS events; however, our recent experiences show that much more work will be needed. Those measures include:

- SB 167 (Dodd), which requires utility de-energization protocols to mitigate impacts to medical baseline customers. While this is a good starting point, we acknowledge that utility medical baseline customers only represent a small share of those with access and functional needs (AFN) who are dependent upon electricity for medical equipment. Furthermore, some of those AFN residents may not be considered “customers” because they reside in a multi-family dwelling or

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<sup>2</sup> KQED News, *PG&E Confirms 50 Instances of Damage or Hazard to its Equipment During Outages*  
<https://www.kqed.org/news/11779839/pge-confirms-50-instances-of-damage-or-hazard-to-its-equipment-during-outages>

<sup>3</sup> ABC News, *Saddleridge fire began near base of transmission tower in northern Los Angeles: Investigators*  
<https://abcnews.go.com/US/saddleridge-fire-began-base-transmission-tower-northern-los/story?id=66282782>

mobile home park with a master meter and where facility owner is considered the “customer.”

- SB 560 (McGuire), which will improve the resilience of mobile telephone communication systems and require those providers to inform local public safety and emergency response offices of system capabilities during a PSPS event.
- AB 1144 (Friedman), which dedicates 10% of Self-Generation Incentive Program revenues for 2020 to projects that support the resiliency of critical infrastructure in high fire threat districts. We sincerely appreciate your recent Decision (D.19-09-027) establishing a new \$100 million resiliency program to install energy storage to mitigate the impacts of PSPS events due to high wildfire risk. We believe that these resources are vital to help low-income customers, vulnerable households, and critical services facilities remain operational and avoid potentially devastating impacts resulting from a loss of power.

As mentioned, we applaud a number of the directives contained in your October 14<sup>th</sup> letter to PG&E and look forward to the weekly corrective action reports as a first step toward tangibly making progress to mitigate future missteps. In particular, we believe that major utility improvements are needed in the following areas:

- Ensuring reliable access to meaningful information about PSPS-impacted areas and service restoration times. Given PG&E's frequent warnings over several months that Californians should anticipate large-scale PSPS outages, the utility failed to ensure that its primary internet and telephone interfaces with consumers could handle the volume of traffic that occurred. Utilities should ensure that these critical information systems remain accessible and enlist surge capacity to respond to customers in a timely manner.
- Improving communication and coordination with counties.
  - We appreciate your reiteration of the concerns that RCRC and the Joint Local Governments (Mendocino, Napa, and Sonoma Counties, and the City of Santa Rosa) have repeatedly voiced during the various Rulemakings. For example, we have systematically heard that inaccurate information has been communicated belatedly, and there has been little follow-through when IOUs are given feedback from local jurisdictions. We believe that your requirement for utilities to solicit feedback from local governments and to identify specific actions to address that feedback will help ensure that our comments to utilities do not simply fall on deaf ears.
  - We agree that communication with locals needs to be vastly improved, as the existing processes have proven neither timely nor effective to facilitate a two-way dialogue in which questions can be asked and answered.
  - We strongly support directing utilities to work with local governments to identify locations for PSPS community resource centers well in advance. Strong consultation and coordination with local government representatives are essential to ensure that residents have access to the services and resources needed during an extended outage. We agree that the centers should be identified in collaboration with local personnel and that the

decision on which center to open should be made jointly with the impacted local government. It is also vital that those facilities be operated to meet the needs of the local community, both with respect to the services provided and the hours of operation. We have heard a number of unacceptable anecdotal reports of centers being ill-equipped to support AFN residents, shutting down at 8:00 p.m. at night, or being located in neighboring counties (if opened at all).

- We believe it is imperative to embed and empower utility liaisons in County Emergency Operations Centers to quickly resolve issues as they arise. We appreciate your direction that those liaisons must have the latest event information and be empowered to resolve local issues as they arise. Local governments should not be left alone and in the dark during these events.
- We urge the CPUC to include County elections offices in the definition of “critical facilities.” It is unclear what impact a PSPS event would have on elections, both with respect to early voting and at polling places on Election Day. As the state has moved away from paper ballots, it is crucial that we fully evaluate how to ensure the predictability and integrity of our elections processes in light of these new PSPS events. This designation is even more important because D. 19-05-042 requires utilities to partner with critical facilities to 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.
- Improving identification, notification, and mitigation of needs for AFN populations.
  - We appreciate that IOUs have been directed to share information about medical baseline customers with counties in order to assist with the logistics of keeping medically-fragile and low-income individuals safe during a power outage.
  - We acknowledge that the utilities remain responsible for notifying customers of PSPS events; however, the universe of those enrolled in medical baseline programs pales in comparison to those residents who rely upon electricity for life-saving and medical equipment. We encourage the CPUC to direct utilities to survey their customers (and those who live in units served by a master meter) to better understand who needs advanced notification and how to properly mitigate PSPS events for those residents.
  - As expressed in previous comments to the CPUC, the existing utility requirement to sign a non-disclosure agreement (NDA) in order for local governments to obtain information about medical baseline customers is unnecessarily restrictive and impedes the timely provision of assistance by the resources at hand. Local governments have a great deal of experience in keeping sensitive medical information confidential and so appreciate your specific direction that NDAs not be required. We remain confident in our ability to keep personal information confidential.
- Improving accuracy and availability of maps. We agree that PG&E needs to improve its maps and better integrate those maps with other GIS systems. Just

as importantly, those maps must be distributed in a timely manner and should indicate the probability that a given area will be de-energized.

- Enhancing transparency of the PSPS declaration process. There needs to be greater understanding of the factors that the utilities consider in determining whether to declare a PSPS. These factors should be clearly articulated and explained to stakeholders.
- Reducing service restoration times. While we understand the need for post-event system inspections, we support your efforts to accelerate service restoration consistent with D. 00-05-002, which requires service restoration within an average of 12 hours after major storms. We believe the recommendation for PG&E to request resources to perform post-event inspections through mutual assistance processes is innovative and has the potential to significantly expedite service restoration.
- Identifying costs resulting from PSPS events. While PSPS is a powerful risk-avoidance tool, these events result in considerable costs for local governments, businesses, and residents. In addition to local costs related to procuring backup generation resources for critical facilities that must remain operational, locals have shouldered increased personnel costs associated with deploying public safety and social services personnel to maintain order during PSPS events and ensure that AFN residents have been adequately notified and are prepared. You may be aware how de-energization impacts businesses, especially with respect to the loss of perishable goods; however, it appears that at least some insurers are refusing to cover these costs because the insured had advanced warning of the event (in some cases as little as a few hours). Perhaps most troubling are the impacts for low-income residents. Not only do many experience work closures and, therefore, a commensurate pay cut, but food spoilage may mean many run the risk of going hungry or risking food-borne illness because of their inability to afford to replace lost perishables. RCRC encourages the CPUC or the utilities to perform a survey to better understand the local cost impacts resulting from PSPS events and efforts to improve the resiliency of critical infrastructure.

In conclusion, we thank you for your commitment to public safety and for clearly articulating measurable actions for PG&E and other IOUs to take on PSPS events. And, we should stress that these events should always remain a last resort utilized solely to protect the public from catastrophic wildfire.

Sincerely,



MATT KINGSLEY  
Member, Inyo County Board of Supervisors  
RCRC Chair

Ms. Marybel Batjer

October 17, 2019

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cc: The Honorable Gavin Newsom, Governor of the State of California  
Commissioner Liane M. Randolph, California Public Utilities Commission  
Commissioner Martha Guzman Aceves, California Public Utilities Commission  
Commissioner Clifford Rechtschaffen, California Public Utilities Commission  
Commissioner Genevieve Shiroma, California Public Utilities Commission  
Members of the California State Legislature  
Members of the RCRC Board of Directors