

**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 OPENING
COMMENTS TO SCOPING MEMO AND RULING (PHASE I)
RULEMAKING 18-12-005**

Staci Heaton
Regulatory Affairs Advocate
Rural County Representatives of California
1215 K Street, Suite 1650, Sacramento, CA 95814
Tel: (916) 447-4806
E-mail: sheaton@rcrcnet.org

Dated: March 25, 2019

**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 OPENING
COMMENTS TO SCOPING MEMO AND RULING (PHASE I)
RULEMAKING 18-12-005**

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 comment on your rulemaking to examine electric utility de-energization of powerlines in dangerous conditions. RCRC received party status via written ruling on March 18, 2019. RCRC is an association of thirty-six rural California counties, and its Board of Directors is comprised of elected supervisors from those member counties.

Rural communities have historically borne the majority of destruction caused by high severity wildfires. Lake County, for instance, has suffered devastating wildfires every year since 2012. Further, the 2017 Northern California fires in Napa, Mendocino, Lake and Sonoma

Counties and 2018 Camp Fire in Butte County constitute some of the largest, deadliest, and most destructive wildfires in California's history.

We have found that there is no universal procedure for power shut-offs within a single utility and experiences vary widely from one region to the next, often to the detriment of sustaining critical services counties provide. Local governments, especially those in fire-prone areas, are essential partners to ensure de-energization policies meet community needs and reduce the risk of wildfire ignitions.

The CPUC should endeavor to create a consistent plan to guide utilities through an effective de-energization process. That plan should require utilities to notify key county personnel, including county emergency services, law enforcement, and health department officials of the planned outage area, number of customers affected in the outage area, the time of the planned power shut-off, projected duration of the power outage, projected time of power restoration, prompt updates of any changes during the planned outage, identification of all impacted medical baseline customers or other medically vulnerable customers, and identification of all other impacted critical customers, such as hospitals, fire stations, police stations, water districts, waste water treatment plants, telecommunications, and schools.

Further, the CPUC must hold utilities accountable for meeting these de-energization protocols. Too often there is a disconnect between best practices on paper and what, for example, has occurred during the 2018 PG&E public safety power shut-off events. This OIR should add greater accountability of de-energization events and build upon requirements set forth in the *Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018)* in order to strengthen public safety requirements when a utility decides to undergo a planned power shut-off.

Most importantly, the plans should also require utilities to work closely with local governments to determine the types of notification procedures that work best within each region, county, and city. In rural areas populated by a greater number of elderly persons, many of whom may be medical baseline customers that rely on electricity to sustain vital health care needs, advance notice and preparation for public safety power shut-offs is extremely important for communities. Further complicating notification efforts is the fact that most rural areas are disadvantaged by severely inadequate broadband and internet connectivity. Working with local

partners and key county leaders will ensure that those who know the community best will not leave anyone in the dark.

Per our prior correspondence on January 4, 2019, we have done surveys of our member counties that demonstrate wide inconsistencies regarding adequate and timely information supplied to county leaders from utilities during planned public safety power shutoffs. During the week of October 14, 2018, several RCRC member counties and residents located in Amador, Butte, Calaveras, El Dorado, Lake, Napa, Nevada, Placer, Plumas, Sierra, Sonoma, and Yuba were advised they would likely experience power shutoffs due to severe winds that could trigger wildfires. Both Calaveras and Yuba Counties had good communication with PG&E; whereas Napa, Sonoma, and Placer Counties did not. The frequent theme from RCRC member counties regarding PG&E's handling of the power shutoff was the lack of adequate and timely information disseminated to both residents and key county leaders (i.e. Sheriff and Office of Emergency Services officials) to sufficiently prepare impacted communities for the impending shutoffs.

It is also our observation that in areas where PG&E is undergoing extensive vegetation management in order to clean-up the fuel load left by the five-year drought and bark beetle infestation, communication with local government was largely acceptable. Places like Madera and Tuolumne counties generally have a collaborative relationship with PG&E officials through tree mortality efforts to remove dead and dying trees and are already in routine communication on continued community protection efforts in those high hazard counties. Robust Wildfire Mitigation Plans (WMPs) and a standard set of guidelines for utilities to follow will likely result in good working relationships that could be replicated in other counties.

Further, feedback from RCRC member counties indicate the High Fire-Threat District maps were not helpful nor accurate in identifying areas during the power shut-offs where advance communication was most critical. While we understand the predicament utilities are in with regard to de-energization events, the current methods used to determine these shut-offs is mediocre at best and must be more inclusive of a local public process to meet the needs of fire-prone communities.

The Phase 1 scoping memo specifically asks the following questions, which RCRC responds to below.

A. What, if any, updates or modifications should be made to Resolution ESRB-8 to ensure that, should de-energization become necessary during the 2019 wildfire season, de-energization is undertaken as efficiently and safely as possible? (What is efficient? What is safe?)

Any de-energization protocols in this Rulemaking should be built further upon requirements under a Wildfire Mitigation Plan and be incorporated into future WMPs. Utilities should have situational awareness with advanced weather stations, high definition cameras, and granular maps of affected areas. The CPUC should require impact reductions through system sectionalization. A PSPS event is efficient if the IOU can reduce the impacts on as few customers as possible. Being safe must extend beyond asset management of an IOU; it must take into account the safety of critical facilities or vulnerable populations to be without water and power.

B. Notification and communication to the public (including vulnerable populations), local governments, critical facilities, and emergency/first responders;

1. What are the best ways to notify the aforementioned parties of a planned de-energization event and when power will be restored in the event of de-energization?

Many rural Californians are disadvantaged by poor telecom infrastructure, such as internet access and broadband availability. Many of our residents rely on landlines. Notification must be thorough and persistent, but utilities must work with local governments in advance to determine locally which notification procedures work best by region. A one fits all approach will not work.

- a. How far in advance (and in what order of priority) should the aforementioned parties be notified of an upcoming de-energization event?*

Notice should be given at least 48 hours in advance, or more if agreed upon between regional representatives and local governments. This should be possible with sophisticated weather tracking and monitoring. Further, if utilities have proper working relationships with local partners, communication would be on-going and reciprocal.

b. What information should be conveyed about an upcoming de-energization event?

As previously stated, at a minimum, de-energization should result in the following to affected local government:

- 1) planned outage area,
- 2) number of customers affected in the outage area,
- 3) the time of the planned power shut-off,
- 4) projected duration of the power outage,
- 5) projected time of power restoration,
- 6) prompt updates of any changes during the planned outage,
- 7) identification of all impacted medical baseline customers or other medically vulnerable customers,
- 8) identification of all other impacted critical customers, such as hospitals, fire stations, police stations, water districts, waste water treatment plants, telecommunications, and schools.

c. Who should be responsible for notifying affected customers/populations? Should the utilities be solely responsible, or should other parties such as local governments have a responsibility in communicating these events?

Utilities should retain sole responsible for notifying affected customers. Utilities should have sophisticated details of the number and types of customers affected, such as hospitals, businesses, and residents, as well as the communications preferences of the customer.

- d. *What systems should be used for notification of customers (for example, the Standardized Emergency Management System framework, reverse 9-1-1, etc.)?*

Rural counties are disadvantaged by insufficient internet connectivity and broadband. Many of our residents rely on landlines. In these areas, communication redundancies are necessary during an emergency. Generally, RCRC supports the Standardized Emergency Management System (SEMS) framework during disaster response. IOUs should adopt SEMS protocols to ensure clearer coordination during PSPS events and potential emergency events. Utilities should also work with local governments in advance to help determine what notification systems work best regionally.

2. How should ‘vulnerable populations’ be defined and identified?

- a. *Is a list of Medical Baseline customers sufficient, and if not, how should the utilities identify vulnerable populations?*

Medical baseline customers are not a sufficient, nor comprehensive, identifier of vulnerable populations. Elderly residents are especially vulnerable but may not necessarily rely on electricity to sustain vital health care needs. Areas with one ingress/egress are also vulnerable during extreme weather events that may lead to ignition of wildfires and evacuations. Many rural areas have entire communities where residents rely on pumped water wells, which require electricity. During fire season, temperatures are hot and dry and cooling centers may be required during extended power shut-offs.

We would also caution against using the CalEnviroScreen tool solely to identify disadvantaged communities, as almost all of the most fire-prone communities would be eliminated from consideration. California’s diversity is also representative in the diversity of needs and vulnerabilities of different communities. Local government entities can help conduct a focused risk assessment.

3. How should critical facilities be defined and identified?

RCRC believes critical facilities should include:

- First responders, such as police, fire, emergency dispatch centers, prisons and jails;
- Healthcare facilities such as hospitals, assisted living facilities, skilled nursing homes, surgical centers, health clinics, urgent care, blood banks and kidney dialysis centers;
- Critical telecommunications infrastructure;
- Water agencies and utilities, such as water treatment facilities, sewage plants, irrigation districts;
- Schools and childcare facilities;
- Fairgrounds or other local government staging sites, including evacuation centers and shelters, as well as municipal airports.

4. How should first responders/emergency responders be defined and identified?

a. Should water utilities and communication companies be defined as first responders?

The CPUC should adhere to the Standardized Emergency Management System (SEMS) to ensure consistent emergency response protocols. Within the PSPS context, water utilities and communications should be notified as a first responder because they provide critical services to critical facilities such as healthcare facilities and staging sites.

C. What structures and practices should be in place to maximize coordination between utilities and first responders/local governments?

1. Should the utilities be required to embed liaison officers (who are empowered to make decisions on behalf of the utility) in emergency operations centers carried out under state and local plans consistent with SEMs?

Yes, utilities should have a liaison officer that is empowered with decision-making capabilities to be available as a single point of contact. These liaison officers should be available and communicative during de-energization events and in emergency operations centers, and

should work with local government officials before an emergency event to coordinate emergency plans ahead of time.

D. What information should be provided to the Commission after a de-energization event to show that de-energization was used as a method of last resort and that it was in compliance with Commission rules?

The Commission should be supplied with the same information that was supplied to local government agencies and customers prior to a power shut-off. There is no reason to withhold information from local leaders that would otherwise be given to CPUC. Further, the CPUC should request what actions utilities took to strategically sectionalize the areas of the risk from non-risk factors to minimize the impacts of residents and community services, including preventing negative economic impact on local businesses and schools.

III. Conclusion

RCRC's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, Rural County Representatives of California respectfully requests that the CPUC grant this Motion for Party Status filing.

Dated: March 25, 2019

Respectfully submitted,

/s/ Staci Heaton

Staci Heaton

Regulatory Affairs Advocate

Rural County Representatives of California

Tel: (916) 447-4806

E-mail: sheaton@rcrcnet.org