

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

*Order Instituting Rulemaking to Update Rules for
the Safety, Reliability, and Resiliency of Electrical
Distribution Systems*

Rulemaking 24-05-023
(Filed May 30, 2024)

**OPENING COMMENTS OF RURAL COUNTY REPRESENTATIVES OF
CALIFORNIA ON ORDER INSTITUTING RULEMAKING TO UPDATE RULES FOR
THE SAFETY, RELIABILITY, AND RESILIENCY OF ELECTRICAL DISTRIBUTION
SYSTEMS**

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I. Introduction

Pursuant to Rule 6.2 of the California Public Utilities Commission (“Commission” or “CPUC”) Rules of Practice and Procedure, the Rural County Representatives of California (“RCRC”) submits comments to *Order Instituting Rulemaking to Update Rules for the Safety, Reliability, and Resiliency of Electrical Distribution Systems* (“Rulemaking” or “OIR”) issued on May 30, 2024. RCRC is an association of forty rural California counties¹, and our Board of Directors is comprised of an elected Supervisor from each of our member counties.

II. Background

RCRC’s strives to promote a greater understanding among policy makers about the unique challenges California’s low population counties face in delivering public services and to enhance the quality of life in small and rural counties. County governments play a critical role in ensuring the safety

¹ RCRC members include Alpine, Amador, Butte, Calaveras, Colusa, Del Norte, El Dorado, Glenn, Humboldt, Imperial, Inyo, Kings, Lake, Lassen, Madera, Mariposa, Mendocino, Merced, Modoc, Mono, Monterey, Napa, Nevada, Placer, Plumas, San Benito, San Luis Obispo, Santa Barbara, Shasta, Sierra, Siskiyou, Solano, Sonoma, Sutter, Tehama, Trinity, Tulare, Tuolumne, Yolo and Yuba counties.

and well-being of residents by providing essential public safety services (including emergency management and response) and safety net services. RCRC's counties comprise approximately 60% of the state's landmass with geographies ranging from forested and mountainous landscapes to coastal areas, desert regions, farmlands, and vineyards. RCRC's counties are home to nearly 15% of the state's population (approximately 5.8 million people) and include vast swaths of state and federally owned land (U.S. Forest Service, Bureau of Land Management, California State Parks, etc.). Recreational opportunities abound in rural counties and some of our communities receive millions of visitors annually.

Our communities have borne the lion's share of destruction caused by wildfires and endure frequent planned and unplanned power outages intended to reduce the risk of (and liability for) utility-caused wildfires. Local emergency responders must ensure the safety of residents and visitors alike, especially during natural disasters, severe weather events, and wildfires; however, power outages complicate those responsibilities.

The frequency and duration of power outages have increased dramatically over the last several years and create significant dangers to public safety and wellbeing. RCRC's member counties operate many critical facilities and infrastructure that provide vital services. Rural counties often lack the resources necessary to fully mitigate the impacts of electrical outages, especially when a loss of power comes without warning. As more residents rely on temporary backup generators, public safety risks can escalate considering the fire and carbon monoxide dangers generators can pose.

The recurring nature of "fast trip" outages pose health, safety, and economic burdens on many rural residents. While originally anticipated to be a "stop gap" measure to reduce the risk of wildfires until other mitigation measures (like undergrounding, installation of covered conductors, etc.) could be put into place, there remains a great deal of uncertainty in many areas as to when (or if) residents will again have access to reliable electricity. While there were dramatic improvements in the number of outages experienced on certain circuits between 2022 and 2023, there were a similar number of circuits that saw a dramatic *increase* in the number of outages experienced year over year. Clearly, much work remains to be done. RCRC welcomes this Rulemaking to ensure that utilities make meaningful improvements in energy reliability without sacrificing grid safety.

III. Discussion

RCRC appreciates the Commission's establishment of this Rulemaking to both examine and consider changes to existing practices concerning the safety, reliability, and resiliency of electrical distribution systems. RCRC has long requested that utility "fast trip" programs be regulated and, to the

extent practicable, be more standardized across investor-owned utilities (IOUs) to minimize inequities and ensure consistent execution, including (but not limited to) consistency with program reporting, operational guidelines, resource deployments, mitigation strategies, and general resiliency. While the state has avoided large scale brownouts and blackouts in recent years, persistent *discreet* outages have plagued rural areas of the state, with over 2,000 outages annually in high fire risk areas in 2022 and 2023. These outages appear to impact customers differently among the IOUs' service territories.

RCRC supports the concerns identified in the Rulemaking and complementary proceedings focused on improving the safety and reliability of electrical distribution systems. This proceeding should incorporate available data from R.18-12-005 (De-Energization OIR), including reports and compliance filings on Public Safety Power Shut-off (PSPS) events, pre-season activities, and after-action reports. More importantly, PG&E's monthly reports on their Enhanced Powerline Safety Settings (EPSS) should be concurrently filed to this proceeding and past reports should also be incorporated into the record. These reports are currently only served to parties of R.18-10-007 and I.15-08-019 (both of which are closed) and are not accessible through any docket.

Significant improvements have been made since the large-scale October 2019 PSPS event; however, many residents continue to face pervasive challenges as utilities struggle to balance the safety and reliability of their infrastructure. Some of the lessons learned over the last few years may help fine-tune safety, reliability, and resiliency protocols for safety-related outages.

Preliminary Issues

RCRC supports the preliminary scope of issues outlined in the OIR, including: 1) Reliability of electrical distribution service, 2) Outage transparency for customers, 3) Supporting short-term reliability, safety, and system resilience, and 4) Reasonableness of costs and cost allocations. RCRC believes the greatest emphasis should be placed on the topics concerning repetitive outage information and remediation. It is absolutely reasonable to require utilities to provide data on the segments of infrastructure that have repeatedly failed and their repair/response actions. This must be interpreted broadly enough to include not just individual *pieces* of equipment, but those circuits and line segments subject to repeated outages (this is particularly relevant in the context of fast trip outages). The Commission should do more than just establish a standard process for determining if a piece of failing infrastructure should be repaired or replaced: it should establish expectation for utilities to repair or improve equipment, line segments, and circuits to reduce the risk of repeated outages going forward.

With respect to creation of a triage system for outages, RCRC understands this to mean development of a triage system to prioritize utility *responses* to system outages. The drafting of the OIR is ambiguous, so we suggest clarifying the Commission’s intent. Based upon this assumption, we suggest that customer characteristics, customer impacts, frequency of outages, and safety risks are critical elements that should be considered in determining the priority for responses to outages. At the same time, it is important that the framework provide utilities with flexibility and avoid creation of a rigid framework that constrains utilities from responding as necessary given the unique aspects of each situation.

In addition to (or potentially within), these identified categories, RCRC suggests a few additions to the preliminary scope of issues.

1. Fast Trip Reports for All Utilities with Greater Outage Details

Currently, PG&E is the only utility that provides monthly reports of their EPSS program; however, all investor-owned utilities utilize sectionalization devices in some form or fashion to reduce the potential for ignitions. The Commission should consider enhanced reporting requirements for all utilities as to how these settings impact energy reliability. Many fast-trip outages (per PG&E’s monthly reports) have unknown causes or overly generic descriptions. The CPUC should consider greater details surrounding the categories of outages and sub-category descriptions (e.g. object contact, animal contact, vehicle contact, balloon contact) to better understand the cause of the outage (recognizing that there are certain situations where the utility may not be able to reasonably identify the cause).

PG&E’s monthly EPSS reports provide a wealth of information to the Commission and the public; however, it is difficult to track progress over time with respect to the frequency, duration, number of customers impacted, and cause of outages on a circuit-by-circuit level. These reports should be supplemented with information on the work being done (or planned) by the utility to reduce the number of outages expected on those circuits that have experienced six or more outages in a calendar year (some circuits have experienced more than six outages in a single month). This “forward looking” supplement to the EPSS reports would provide reassurance to those residents who experience the greatest number of outages.

2. Linkage Between System Hardening Plans for Circuits with Frequent or Persistent Power Outages

RCRC suggests that utilities better align and clarify the scope of work contemplated in Wildfire Mitigation Plans, General Rate Cases, and other planning documents to improve system resiliency and mitigate wildfire risk. Currently, it is difficult for impacted communities and

residents to determine if any planned undergrounding or covered conductor work will be performed on any of those circuits that have experienced frequent EPSS power outages. Since EPSS outages are triggered by something coming into contact with a powerline, the frequency of EPSS outages on a given circuit would seem to indicate that that circuit poses a significant wildfire risk and so should be prioritized for installation of covered conductor or undergrounding. Better alignment and coordination among utility plans would provide residents, stakeholders, and the Commission with a more holistic understanding of utility maintenance and hardening work.

As noted above, many communities are exceptionally frustrated by fast-trip outages because there is no indication there will be an improvement in energy reliability anytime soon, even though the utility may be planning system improvements like sectionalization, installation of covered conductors, or undergrounding in the coming years. Improving transparency about planned improvements to address frequent outages will help relieve some of that frustration and enable customers to make plans for the future. Businesses, residents, and community facilities should be able to make informed decisions on what short-, medium-, or long-term back-up generation may be needed until system hardening upgrades can be performed by the utility.

3. Support/Enable Community Disaster Resilience Zones

This proceeding should consider policy changes to better utilize existing resources to improve resiliency more broadly. The De-Energization Proceeding (R.18-12-005) defined critical facilities and identified how utilities can mitigate proactive power outages during extreme weather threats. Currently, certain mitigation tools (like some community microgrids) are only available during PSPS events but are not utilized during other prolonged outages. While we recognize the operational and engineering differences between planned and unplanned “fast trip” outages, utilities should work with local governments to identify core areas or centers that can remain energized as “resilience hubs” for impacted residents.

The Federal Emergency Management Agency (FEMA) identifies Community Disaster Resilience Zones (CDRZ) using data-driven assessments to identify census tracts at greatest risk of natural hazards and climate change, thereby providing access to federal financial support to improve resiliency. The Commission could look to FEMA’s approaches to safeguard critical energy infrastructure in disadvantaged communities to leverage outside funding sources.² If voters

² FEMA utilizes the Climate and Economic Justice Screening Tool, accessed here: <https://screeningtool.geoplatform.gov/en/#3/33.47/-97.5>

approve SB 867 (Allen) (The Safe Drinking Water, Wildfire Prevention, Drought Preparedness, and Clean Air Bond Act of 2024)³, \$60 million in bond funding will be available to create strategically located community resilience centers across the state.⁴

III. Categorization and Proposed Schedule

RCRC agrees with the quasi-legislative categorization of the proceeding and the plan to conduct workshops within each track or phase (as needed). RCRC suggests the Commission hold an introductory workshop to “level set” how each of the utilities currently approach the calibration of their fast trip settings and to obtain more information on how the number, frequency, cause, and scope of recurring outages differ among the utilities. A panel of non-utility stakeholders could suggest methods to improve transparency and situational awareness and discuss short-term reliability and resiliency standards that may be considered in this proceeding.

IV. Conclusion

Californians should not have to choose between having safe *or* reliable electricity. This proceeding is an important venue to ensure reasonable rules and expectations are established to protect residents and ensure that utilities continue to improve their provision of safe, reliable, and affordable electricity. The reliability improvements contemplated in this Rulemaking are even more important as the state seeks to increase electrification of buildings, appliances, and vehicles. RCRC appreciates your consideration of our comments and the recommendations contained herein.

Respectfully submitted,

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³ https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240SB867.

⁴ Proposed Public Resources Code Section 92550.