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BY ELECTRONIC TRANSMISSION

Ms. Poppe,

Pacific Gas and Electric Company's (PG&E) execution and communication of its wildfire mitigation device setting known as Fast Trip¹ has been extremely concerning and requires immediate action to better support customers in the event of an outage. This letter details my concerns and provides direction to PG&E regarding my expectations going forward.

Since PG&E initiated the Fast Trip setting practice on 11,500 miles of lines in High Fire Threat Districts in late July, it has caused over 500 unplanned power outages impacting over 560,000 customers. These Fast Trip-caused outages occur with no notice and can last hours or days. Though PG&E reports that implementation of Fast Trip settings has significantly reduced reportable wildfire ignitions from contact with its power lines, this approach has also significantly increased the frequency and duration of unplanned power outages for its customers, causing confusion and frustration in communities constantly vigilant of wildfire threats.

While I acknowledge how critical it is to public safety to reduce the risk of utility-ignited wildfires, it appears that PG&E decided to implement Fast Trip settings this summer with little forethought as to whether the settings were appropriately calibrated, what outreach to public safety partners and customers was necessary in advance, and how customer impacts would be mitigated and vulnerable customers' medical needs addressed. Fast Trip outages are more than a matter of inconvenience – they are disruptive, and for customers who rely on electricity to maintain necessary life functions, they can be life-threatening.

I am aware that PG&E has begun recalibrating its original Fast Trip settings to be less sensitive and has begun better communicating with impacted communities, however, from my current perspective, it is clear that PG&E is still in planning mode. PG&E must immediately work to address customer impacts for communities affected by these outages.

¹ Also referred to as Enhanced Powerline Safety Settings.

Unlike a Public Safety Power Shutoff event, by definition, Fast Trip settings do not allow for advance notice to customers of an outage. This means that customers, public safety partners, and critical infrastructure providers have no ability to plan and prepare for one of these outages.

While there are important dissimilarities between Public Safety Power Shutoffs and Fast Trip, I am worried that there are striking similarities in the obvious flaws in PG&E's approach to its initial execution and customer communication on both programs. An approach that can only charitably be characterized as shortsighted. In both instances, care and understanding for how the loss of power may affect customers has been overwhelmingly absent. These apparent similarities are not just disappointing, they are deeply and sincerely concerning, and continue to raise questions about PG&E's ability to evolve as a company and to internalize and prioritize customer well-being.

To the extent PG&E plans to continue use of Fast Trip settings, we understand PG&E will introduce and report on this approach in its 2022 Wildfire Mitigation Plan submission to the Office of Energy Infrastructure Safety. While we expect that PG&E will continue to work with the Office of Energy Infrastructure Safety and Commission staff to communicate and demonstrate where this approach falls in PG&E's overall wildfire mitigation strategy, in the very near-term, having this program active has real consequences for the health, comfort and safety of PG&E's customers. I expect PG&E to take immediate action to reduce and mitigate customer impacts and ensure that all communities who may be impacted by Fast Trip are better informed and supported.

While this is my clear top-level expectation, I also expect PG&E to comply with the following directives.

Near-Term Transparency and Action

By November 8, 2021, provide a written response to the questions below to the Director of the Commission's Safety Enforcement Division and serve it on the service lists for the Wildfire Mitigation Plan (R.18-10-007) and PG&E Safety Culture (I.15-08-019) proceedings.

1. What level of analysis did PG&E conduct in advance of deploying Fast Trip settings regarding the potential impacts of Fast Trip on outage frequency and duration? How do the scope and duration of outages that have occurred align with estimates from any analysis conducted pre-deployment?
2. Describe PG&E's understanding of how its Fast Trip settings and the specific parameters used to configure devices differ from similar settings Southern California Edison Company and San Diego Gas & Electric Company are using or have used on their systems to prevent ignitions.
3. Describe the operational details, with timelines, for how PG&E will manage its Fast Trip settings approach and how objectives such as reduced scope, duration and frequency of outages are prioritized.

4. What conditions or criteria will PG&E use to determine when to suspend use of Fast Trip in a particular location?
5. What conditions or criteria will PG&E use to determine when to deploy Fast Trip in a particular location in the future?
6. How is PG&E identifying medical baseline customers, critical infrastructure providers, and public safety partners who may be impacted on the circuits where Fast Trip settings have been implemented?
 - a. What specifically tailored outreach has occurred to each of these groups?
 - b. If none has occurred, what are PG&E's plans for specifically tailored outreach to each of these groups?
 - c. What actions is PG&E taking to support these customers and minimize the impacts of outages? For example, is PG&E working with its Disability Disaster Access and Resources (DDAR) program and appropriately providing funding, and are local Independent Living Centers notified as soon as a Fast Trip outage occurs?
7. How is PG&E ensuring that customers who rely on electricity to maintain necessary life functions will be able to weather the full duration of a Fast Trip outage?
 - a. How many customers who rely on electricity to maintain necessary life functions, including for durable medical equipment and assistive technology, does PG&E estimate have been impacted by Fast Trip outages to date?
 - b. Does PG&E have a well-defined list of customers who rely on electricity to maintain necessary life function who are on circuits subject to Fast Trip settings?
 - c. If it does not have a list, what actions is PG&E taking to have a clear understanding of where these customers are located?
8. What post-Fast Trip outage outreach is PG&E conducting to customers on circuits that have been highly impacted by Fast Trip?
 - a. Does PG&E provide information on how to enroll in its medical baseline program and make customers aware of resiliency programs like DDAR and the portable back up battery program?
9. How has PG&E increased its staffing and contracting resources to ensure that outage inspections are occurring in a manner that allows for re-energizing lines quickly and safely?
10. How is PG&E calculating and tracking costs associated with implementation of its Fast Trip settings?
11. Is PG&E including unplanned outages caused by Fast Trip in the annual reliability reporting requirements for System Average Interruption Duration Index (SAIDI) and System Average Interruption Frequency Index (SAIFI) as laid out in Decision 16-01-008? If not, please explain why.

Ongoing Transparency and Accountability Reporting

Beginning November 8, 2021, PG&E must provide monthly reports to the Director of the Commission's Safety Enforcement Division and serve them on the service lists for the Wildfire Mitigation Plan (R.18-10-007) and PG&E Safety Culture (I.15-08-019) proceedings. The reports shall include at a minimum the information listed below and the cadence and content of the reports may be augmented at any time at the discretion of the Safety Enforcement Division.

- For every Fast Trip outage on a circuit:
 - Total scope of customers impacted, include specifics for:
 - Number of medical baseline customers impacted
 - Number of customers who rely on electricity to maintain necessary life functions impacted
 - Number of well water customers impacted
 - Number of schools impacted
 - Number of hospitals impacted
 - Duration
 - Cause of outage, if known
 - Efforts undertaken to clear lines and restore power within 60 minutes
- The total number of times that a circuit has experienced a Fast Trip event
- Trends of scope and duration of outages on repeatedly impacted circuits

Cost Tracking

To the extent it is not already doing so, PG&E is directed to track all of the costs associated with Fast Trip separately from other wildfire mitigation activity costs, including costs associated with customer communication, outage response, and inspection.

While the reporting requirements and related directives included in this letter are intended to drive action by PG&E in the very near-term, the CPUC will continue to gather information regarding PG&E's implementation and communication of Fast Trip and will take any enforcement actions as appropriate.

Customer care and safety, which consists of more than just the absence of utility-ignited wildfires, is a top priority for the CPUC. We expect PG&E to not only share this priority, but to execute its activities in a way that reflects this priority.

Sincerely,



Marybel Batjer, President
California Public Utilities Commission

cc:
CPUC Commissioner Martha Guzman Aceves
CPUC Commissioner Darcie L. Houck

CALIFORNIA PUBLIC UTILITIES COMMISSION

CPUC Commissioner Clifford Rechtschaffen

CPUC Commissioner Genevieve Shiroma

CPUC Executive Director, Rachel Peterson

Sumeet Singh, Senior Vice President and Chief Risk Officer, PG&E

Adam Wright, Executive Vice President, Operations and Chief Operating Officer, PG&E

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