

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

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

Rulemaking 18-10-007
(Filed October 25, 2018)

**CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE'S COMMENTS
ON THE PROPOSED RESOLUTIONS RELATED TO THE
2020 WILDFIRE MITIGATION PLANS**

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Dated: May 27, 2020

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The California Environmental Justice Alliance (“CEJA”) respectfully submits these comments in response to May 7, 2020 Proposed Resolution related to Overall Guidance, Pacific Gas & Electric Company’s (“PG&E’s”), Southern California Edison’s (“SCE’s”), and San Diego Gas & Electric Company’s (“SDG&E’s”) Wildfire Mitigation Plans. Due to limits of time, CEJA focused on these three utilities. These comments are timely served pursuant to the timeline identified in the resolutions.

INTRODUCTION

As CEJA’s comments to the Wildfire Mitigation Plans (“WMPs”) described, wildfires have the potential to cause catastrophic impacts. Certain communities throughout the state are less prepared and more vulnerable to fires and their impacts. Communities that are linguistically isolated, that lack the resources to evacuate, and that already breathe unhealthy air are more likely than other communities to be devastated by a wildfire impacts. And when a wildfire takes place, low-income community members who work in businesses impacted or destroyed by fires are less likely to be able to afford their energy bills while transitioning to new work or residence. All these vulnerabilities are magnified by the coronavirus pandemic, making community members more likely to suffer extreme health effects and laying waste to low-income communities’ tenuous earnings.

The Wildfire Safety Division’s (“WSD’s”) proposed resolutions appropriately critique the utilities’ approaches to prioritizing risk, risk spending efficiency, and the need for longer-term strategic thinking. Risk and prioritization evaluations must focus on local impacts to the communities that are most likely to be impacted by wildfires. As WSD summarizes, “[a]ll

utilities should take a more robust strategic approach that leverages additional Risk Spend Efficiency (RSE) data to focus on the most impactful actions-*all with a local lens.*”¹

WSD’s analysis appropriately finds several areas of necessary improvement in the WMPs, and that these proposed resolution should not “be construed as approval of the costs associated with WMP mitigation efforts.”² A few aspects of WSD’s analysis could benefit from additional clarification and analysis to ensure that communities are considered within the WMPs with more effective outreach, customer protection, transparency, and reporting. Consideration of the human impact of wildfires is essential to mitigating both the potential for catastrophic wildfires and the damages should one occur. With these recommendations, we believe that approval of the plans will set the state in the right direction to mitigate the potential for catastrophic wildfires.

DISCUSSION

CEJA recommends eight changes to the proposed resolutions. First, the resolutions should clarify that utilities must take into account the relevant characteristics of populations when prioritizing hardening, especially for reducing the impacts of Public Safety Power Shutoff (“PSPS”) events. Second, the resolutions should specify that utilities need to commit to taking community outreach into account when determining how best to mitigate PSPS events. Third, the resolutions should make clear that the utilities’ evaluations of PSPS events must include consideration of the negative impacts associated with these events. Fourth, WSD almost completely ignored the need for clearer requirements for customer protection after events. The resolutions should ensure that outreach is conducted to impacted populations and that metrics for providing customer protection are clear. Fifth, WSD should require utilities to measure outreach in verifiable, quantifiable ways. Sixth, WSD should adopt or develop a confidentiality matrix to ensure that as much information as possible is public. Seventh, WSD should include measurements to ensure that its guidance related to COVID is directed toward mitigating impacts to already vulnerable communities. Eighth, CEJA notes that the summaries of its comments in the resolutions are only a subset of its concerns. CEJA also recommends that WSD’s analysis of the microgrids ensure consistency with the Commission’s microgrid proceeding.

¹ Draft Resolution WSD-004, p. 2 (emphasis added).

² Draft Resolution WSD-002, p. 3.

1. The Utilities' Prioritization Should More Clearly Take Into Account the Human Impact.

AB 1054 requires the WMPs to include “[a] list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks.”³ When considering “all” risks, one of the most significant risks from catastrophic wildfire is socioeconomic factors that make certain populations more vulnerable to the devastating impacts of wildfires. These factors, which can turn a wildfire into a catastrophe, must be considered. AB 1054 requires consideration of all risks, not just biophysical risks, and the human impact of wildfires and the higher risks certain populations face should not be ignored. Disadvantaged communities and communities with increased vulnerability to wildfires should be considered when prioritizing projects, especially projects that can limit the impact of PSPS events.⁴

As described in CEJA’s initial comments, the three largest utilities consider socioeconomic vulnerabilities to different extents. Although SCE has a Social Vulnerability Index, it only considers socioeconomic vulnerabilities when deciding where to underground lines, and when asked, it failed to cite any example of a situation in which a location of a hardening measure was prioritized based on its proximity to populations with increased social or economic vulnerabilities.⁵ Similarly, although SDG&E states that “the needs of vulnerable populations are a critical part of determining which projects to implement,” it fails to quantify how vulnerabilities is taken into account.⁶ PG&E considers the number of “customers living in proximity to that circuit”, but it does not consider whether that population has increased vulnerabilities.⁷

WSD correctly found that more needs to be done to show how risk is being prioritized. WSD found that all the utilities’ WMPs suffer a “[I]ack of detail and discussion of how electrical corporations use risk modeling efforts to support utility decision-making to prioritize WMP initiatives.”⁸ For SCE, WSD found that “it is unclear from SCE’s WMP how these tools are used to drive prioritization of specific wildfire mitigation initiatives to minimize wildfire risk and

³ Cal. Public Util. Code § 8386(c)(10) (emphasis added).

⁴ See CEJA WMP Comments, April 7, 2020.

⁵ SCE Response to CEJA Question 2 (2/27/20).

⁶ SDG&E Response to CEJA 1 (March 4, 2020).

⁷ PG&E Response to CEJA Question 4.

⁸ Proposed Resolution WSD-002, p. 17.

PSPS.”⁹ As such, WSD rightly found that “SCE will not only need a granular and accurate understanding of its own risk profile, but it will also need to leverage that information to inform decisions about which wildfire mitigation initiatives to invest in and where to prioritize deployment.”¹⁰ Notably, SCE states that it “prioritizes its PSPS mitigation and grid hardening efforts by considering community-specific attributes to reduce the frequency and scope on communities most impacted by power outages.”¹¹ WSD further observes, though, that SCE “does not specify what information is used in determining that ranking or how that circuit risk-ranking is used to determine which mitigation initiatives are deployed there.”¹² And finally, WSD notes that “SCE does not show that it is targeting deployment of initiatives to the highest-risk areas.”¹³ WSD then finds that “[f]or SCE’s plan to be effective, strategic prioritization of initiatives geographically and by ignition driver to target the highest risk portions of SCE’s grid is crucial.”¹⁴

As related to PG&E, WSD noted that, with a large service territory, many high fire-threat grid areas, and lower maturity scores than its “peer utilities”, it is vital for PG&E’s plan to set out “strategic prioritization of initiatives” both “geographically and by ignition driver....”¹⁵ It is not clear how PG&E is using risk assessment tools “to drive prioritization of specific wildfire mitigation initiatives to minimize wildfire risk and PSPS.”¹⁶

Finally, WSD found that “[a]lthough SDG&E’s WMP states that it uses prioritization methods and resource allocation processes to identify if, where and how each of these measures should be pursued, the WMP does not provide an adequate description of those methods and processes nor how specifically they lead SDG&E to identify which measures to pursue.”¹⁷

WSD then proposes to require utilities to identify all risk analyses that they are performing,¹⁸ but it does not specify that each plan must ensure the risk analysis includes impacts to communities.

⁹ See Proposed Resolution WSD-004, p. 5.

¹⁰ Proposed Resolution WSD-004, p. 5.

¹¹ Proposed Resolution WSD-004, p. 8.

¹² Proposed Resolution WSD-004, p. 10.

¹³ Proposed WSD-004, p. 25.

¹⁴ Proposed WSD-004, p. 25.

¹⁵ Proposed Resolution WSD-003, p. 27.

¹⁶ Draft Action Statement on PG&E’s 2020 Wildfire Mitigation Plan, p. 4.

¹⁷ Proposed Resolution WSD-005, p. 27.

¹⁸ Proposed Resolution WSD-004, p. 19.

To ensure that the potential human impact is into account, we request that the resolutions explicitly specify that populations' vulnerabilities, and the impacts to those populations based on their vulnerabilities, be taken into account when prioritizing measures, especially measures that reduce the impact of PSPS events. The human impact can change a fire or power shutoff into a catastrophe, and must not be ignored.

2. The Resolutions Should Require Reporting of How Outreach Is Taken Into Account When Determining PSPS Mitigations.

AB 1054 requires WMPs to describe protocols for PSPSs that consider the impacts of a shutoff on public safety, and mitigate those impacts.¹⁹ AB 1054 also requires WMPs to include protocols for supporting customers during and after a wildfire, and specifically for supporting low-income customers.”²⁰

Resource centers are particularly important for vulnerable communities, which often do not have the resources to relocate when the power goes out. These communities are likely to be significantly impacted by the lack of water, air conditioning, refrigeration and communications. Particularly for vulnerable communities, when utilities fail to take direction from community feedback, they may also waste resources on sub-optimal efforts. For example, when PG&E designates a county's single “Community Resource Center” far from the county's most vulnerable communities and largely inaccessible by public transportation, it is useless to those who need it most.²¹

Due to the problems that occurred last fire season, utilities should be required to be more responsive to communities. Because the communities are the experts in what they need, the community should guide the planning for CRCs, as well as for mobile services. This need is more acute given the impacts of COVID-19. As the Guidance Resolution provides: “the WSD expects the electrical corporation to continue to make meaningful progress on PSPS mitigation goals, including continuing with sectionalization projects, local outreach and coordination, establishing customer resource centers, and microgrid projects.”²²

¹⁹ Cal. Pub. Util. Code §§ 8386(c)(6), (18).

²⁰ Cal. Pub. Util. Code §§ 8386(c)(6), (18). Subdivision 18 specifies the WMPs must include a description of compliance with Commission mandates around these topics.

²¹ See, e.g., Oaklanders Get Ready to Face PG&E Power Cuts, Oct. 9, 2019, <https://oaklandnorth.net/2019/10/09/oaklanders-get-ready-to-face-pge-power-cuts/> (describing how the only resource center in Alameda County was located at Merritt College).

²² Proposed Resolution WSD-002, p. 6.

Although WSD requires progress related to local outreach and coordination related to PSPS events, it is critical that it require more than progress. WSD must require that utilities document their PSPS outreach and show how they have taken it into account in their decision-making. Conducting outreach and coordination is meaningless if the information learned from outreach and coordination is not incorporated to better respond to community needs.

3. The Resolutions Should Clarify that Utilities Need to Evaluate the Negative Impacts of PSPS events.

In CEJA’s comments on the plans, CEJA stated that utilities must better measure the impacts of their PSPS events and weigh those consequences when determining whether to call a PSPS event. Notably, “SCE agrees that utilities should eventually factor PSPS impacts into its risk analysis.”²³ Consistent with this request, WSD appropriately found that “[e]stimates do not take into account the full cost of PSPS, which is a critical input to decision making.”²⁴ The Proposed Resolution, however, does not make clear that these estimates need to include all the negative impacts of calling a PSPS event.

Consequences of a PSPS can be very serious – at its most serious, lack of electricity imperils peoples’ lives. The impact of a PSPS on a community varies greatly based on the particular population that is impacted and the resources that are available to the community to adapt to the power outage. For example, due to poor ambient air quality, some communities may have a disproportionately high number of people with underlying respiratory issues that would require breathing assistance. PSPS events can cause additional harm in communities by impacting critical facilities, and creating dangerous conditions as a result of back-up energy resources. Back-up generators have the potential to cause fires, and they release harmful particulate matter when air quality may already be compromised.²⁵

Given this reality, the WMPs should explicitly require consideration of the impacts of PSPS events on specific communities when making the decision to de-energize those communities. Importantly, as WSD noted, “SCE agrees that utilities should factor customer impacts of PSPS into RSE for future WMPs.”²⁶ SCE also acknowledges “the need for greater

²³ SCE Reply Comments, April 16, 2020, p. 7.

²⁴ See WSD Draft Action Statement of SCE 2020 WMP, p. 7.

²⁵ See e.g., <https://www.sfchronicle.com/california-wildfires/article/During-PG-E-outages-generators-caused-fires-14833601.php>

²⁶ Proposed Resolution WSD-004, p. 8.

understanding of impacts from a PSPS event to include enhanced outage notification during PSPS events.”²⁷ As WSD further found, SCE fails to “assess the appropriate thresholds for initiating a PSPS event or achieve reductions in scope, duration, and frequency of PSPS events.”²⁸ WSD further notes that “[i]t is not clear how SCE incorporated consequences of PSPS or impact of the PSPS events on customers and property into modeling.”²⁹ This information should be quantified in advance of fire season, and should be incorporated into decisionmaking around whether to trigger a PSPS event.

In this regard, we support SCE’s call for “collaboration with the Commission, stakeholders, and other IOUs in determining how best to quantify PSPS impact probability and consequence” and for “WSD [to] initiate such a process so that all IOUs can include the progress it makes on a consistent PSPS impact risk analysis in the next WMP update.”³⁰

4. The Resolutions Should Include More Direction Related to Customer Protection, Especially Given the COVID Pandemic.

AB 1054 requires “[p]rotocols for compliance with requirements adopted by the commission regarding activities to support customers during and after a wildfire, outage reporting, support for low-income customers, billing adjustments, deposit waivers, extended payment plans, suspension of disconnection and nonpayment fees, repair processing and timing, access to utility representatives, and emergency communications.”³¹ These requirements include the interim disaster relief emergency customer protections in Commission Resolutions M-4833 and M-4835, and the Commission has affirmed that these resolutions set forth the minimum requirements for utilities.³² The need for customer protections after a disaster is more acute given the COVID pandemic, which has impacted all aspects of life, but most seriously impacted those communities that are already vulnerable. WSD’s resolution does include any discussion or meaningful analysis of the utilities’ plans to meet these requirements.³³

As described in CEJA’s WMP comments, CEJA has two concerns about utilities’ customer protections. First, based on data responses, it appears that utilities rely primarily on

²⁷ Proposed Resolution WSD-004, p. 20.

²⁸ Proposed Resolution WSD-004, p 10.

²⁹ Proposed Resolution WSD-004, p. 40.

³⁰ SCE April 16, 2020 Reply to WMP Comments, p. 8.

³¹ Cal. Public Util. Code § 8386(c)(18).

³² D.18-08-004.

³³ Proposed Resolution WSD-004, p. 45. *See* Proposed Resolution WSD-002, p. 6.

web information and bill inserts or onserts (messages on bills.) For example, SCE relies on its website updates, bill onserts, and it states it “will update social media.”³⁴ It further states it “will” perform outbound outreach and provide local assistance centers and outreach to community based organizations.³⁵ Based on this, it appears SCE relies primarily on its website and bill onserts, rather than direct customer contacts. PG&E also does not rely on or even appear to conduct direct customer outreach to explain protections. For example, PG&E does not conduct direct outreach or work with CBOs.³⁶ This information is unlikely to reach impacted customers unless they are contacted directly by the utility or a CBO given that many are displaced following a fire.

In addition to issues with the type of outreach, utilities appear to not be translating the information into all the languages spoken by communities yet. Customers impacted by wildfires, particularly vulnerable customers, need comprehensible outreach in their language to understand what types of services may be available to them. We request that WSD require utilities to update their WMPs to require outreach about customer protections in the languages spoken by communities, consistent with Commission direction.³⁷

Second, utilities do not clearly define how they will determine who is an impacted customer and what benefits they will receive. This lack of transparency is particularly concerning given the lack of data in the Plans related to how many customers received the protections required to be available by AB 1054. Problematically, when asked how SCE determined “impacted” customer and whether a customer’s employment was impacted, it provided no concrete information about how this was evaluated, stating that “impacts are varying.”³⁸ Although SCE states it will apply the protections available to the account, it is unclear what this means.³⁹ We recommend that SCE provide clear information to customers about how impact is evaluated. PG&E similarly states that “PG&E determines if a customers’ employment is impacted when the customer calls PG&E’s contact center and self-identifies of having their

³⁴ SCE Response to CEJA Question 7 (2/27/20).

³⁵ SCE Response to CEJA Question 7 (2.27/20).

³⁶ PG&E Response to CEJA_003-Q11.

³⁷ D.20-03-004.

³⁸ SCE Response to CEJA Question 7 (2.27/20).

³⁹ SCE Response to CEJA Question 7 (2.27/20).

employment being impacted.”⁴⁰ Despite this lack of clarity, PG&E rejects the need for a clear definition of “impacted customer,” citing to its 2019 WMP sections on customer support.⁴¹

Therefore, CEJA requests that the proposed resolutions require a concrete commitment to performing outreach related to customer protections in a community and to provide clear definitions of when the customer protections apply. In particular, we request that utilities clearly define how “impacted” customers are defined when either employment or their residence is impacted by a wildfire. We further request that customers be allowed to self-certify their particular, disaster-related financial situation, consistent with the Commission’s direction related to COVID.⁴² Self-certification is important when customers have lost their financial documentation.

5. WSD Should Require Clear, Quantifiable Metrics to Measure Outreach.

Outreach before a potential disaster can build trust, which can help ensure strong communication in the event of a wildfire.⁴³ Outreach can also help communities understand the resources available in the event of an emergency. Increasing public awareness of the resources available is an important step for ensuring that communities can be better protected in the event of a wildfire.

SB 901 requires utilities to include “[p]lans for community outreach and public awareness *before, during, and after a wildfire*, including notification in English, Spanish, and the top three primary languages used in the state other than Spanish, as determined by the commission based on the United States Census data.”⁴⁴ SB 901 also separately requires “protocols related to mitigating public safety impacts of” de-energization events.⁴⁵

All the utilities suffered from vague commitments related to outreach. First, WSD states that “SCE does not provide adequate detail on regular, direct engagement with local partners,

⁴⁰ PG&E Response to CEJA-003-Q11.

⁴¹ PG&E Reply, p. 43; *citing* PG&E 2019 WMP section 5.2, which describes PG&E’s response protocol for low-income customers, customers whose premises are “red-tagged” and customers who are subject to evacuation orders.

⁴² *See* CPUC, Consumer Protections During COVID-19 Outbreak, <https://www.cpuc.ca.gov/covid19protections/>.

⁴³ *See* K. Huber, Center for Climate and Energy Solutions, Resilience Strategies for Wildfire, pp. 6-7 (Nov. 2018), <https://www.c2es.org/site/assets/uploads/2018/11/resilience-strategies-for-wildfire.pdf> (citing examples).

⁴⁴ Cal. Public Util. Code § 8386(b)(16)(B).

⁴⁵ Cal. Public Util. Code § 8386(b)(6).

including city and county emergency management, critical infrastructure, and vulnerable, at-risk customers.”⁴⁶ Even more pointed, WSD observes correctly that “[i]t is not sufficient for PG&E simply to state that it will continue outreach and evaluate effectiveness in the future. ... If 2019 proves anything, it is that PG&E must make and meet additional commitments moving forward, rather than resorting to vague representations.”⁴⁷ As WSD then requires, each utility shall “[i]nclude objectives that are measurable, quantifiable, and verifiable by the WSD.”⁴⁸ This should be clarified to explicitly include outreach.

To measure outreach, information should be collected through the WMP process that evaluates both how well the outreach is reaching community members and how well community members understand it, consistent with the requirements of Decision 20-03-004. Both measures of outreach are required by the Commission and necessary to ensure that outreach is meaningful and is continuing to improve. In addition, this assessment needs to be conducted in the appropriate language. The utilities have not shown they are meeting, or uniformly plan to meet, these assessment requirements. For example, PG&E’s assessment of its outreach only was conducted in Spanish and English.⁴⁹ Notably, it appears that SCE is already planning to do this, as it states that it “is developing (and will implement) a comprehensive customer research and feedback program for 2020 to assess the impact of our entire PSPS program and wildfire mitigation activities consistent with the requirements in D.20-03-004.”⁵⁰

Clearer requirements in these resolutions will also ensure that the WMPs reflect all the relevant requirements for the utilities, and not just a subset. Although we understand that outreach reporting is due as part of Decision 20-03-004, a clearer nexus will help ensure that the WMPs comprehensively represent all the requirements related to wildfires. As the WSAB anticipates, “recommendations for the improvement of wildfire mitigation work from multiple sources will be brought together under a utility’s WMP.”⁵¹

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⁴⁶ Proposed Resolution WSD-004, p. 48.

⁴⁷ Proposed Resolution WSD-003, p. 64.

⁴⁸ Proposed Resolution WSD-002.

⁴⁹ PG&E Response to CEJA-003-010.

⁵⁰ SCE Reply Comments, April 16, 2020, p. 16.

⁵¹ Proposed Resolution WSD-002, p. 4.

6. WSD Should Develop or Adopt Clear Matrices that Describe What Information Can Be Withheld as Confidential.

WSD has requirements related to data governance to help create a centralized wildfire-related data repository to conduct collaborative research.⁵² This effort will be seriously hampered if utilities withhold critical information as confidential.

Other parties agree that WSD should develop requirements for designating and challenging confidentiality designations. As SDG&E's reply states: "SDG&E agrees that all stakeholders are well-served by a transparent and understandable process for confidentiality designations and challenges to those designations."⁵³

In response to CEJA's data requests, PG&E marked some information as confidential, stating that it believes the information is proprietary for its business operation. Neither the basis of this confidentiality designation or the process for challenging such a designation was clear. As such, we request that the WSD initiate a stakeholder process to determine what categories of information may be withheld as confidential and to provide the procedural mechanism for parties to challenge confidentiality designations. PG&E asserts no such process is necessary as it is bound by Commission and statutory confidentiality requirements.⁵⁴ And yet, as mentioned above, PG&E's confidentiality assertion provided no information on which to assess the basis for withholding, or to ascertain whether PG&E's withholding was as narrowly-tailored as possible.

A clear approach to confidentiality designations is especially important as WSD changes agencies and the review of the projects related to the WMPs is separated into two regulatory agencies with WSD evaluating the plans, and the Commission deciding whether the costs of those plans are just and reasonable.

As the Commission does, we recommend that WSD "start[] with a presumption that information be publicly disclosed and that any party seeking confidentiality bears a strong burden of proof."⁵⁵ This presumption is based on in part on the fact that the Commission is "a public agency that regulates public utilities, and most of [its] business must be conducted in a

⁵² See, e.g., Proposed Resolution WSD-004, p. 40 (describing data governance requirements).

⁵³ SDG&E April 16, 2020 Reply, p. 7.

⁵⁴ PG&E Reply, pp. 45-46.

⁵⁵ D.06-06-066, p. 2.

public forum.”⁵⁶ Indeed, according to the Commission, “[a]llowing public access to documents is part and parcel of an open decision making process.”⁵⁷

Given the high risk of over-designating information as “confidential,” “the requirement that parties show that their data meet the criteria we establish here must have teeth.”⁵⁸ “If there are no consequences of overstating the need for confidentiality, we suspect parties will simply err on the side of asking that too many documents be held under seal.”⁵⁹ Therefore, “[i]n order to ensure that parties make an honest effort to prove that documents meet the various legal definitions for confidentiality,” the Commission announced that it “will no longer allow parties to submit data under seal accompanied by boilerplate motions for leave to file under seal that do not address the specific documents at issue.”⁶⁰ “Mere recitation of the conclusory statement that information is a trade secret, or is market sensitive procurement information, is not enough to meet the burden of proving entitlement to confidential treatment.”⁶¹ It also clarified that it intends for parties to “treat confidentiality designations with care.”⁶²

Similar to the Commission’s reasoning in the above decisions, the public has a strong interest in having access to the WMPs. As such, WSD should only allow utilities to withhold such material in narrow circumstances. We request that WSD develop guidance and a process for ensuring that the public has access to as much information as possible consistent with the Commission’s direction related to confidentiality. This is the only way to ensure that WSD’s ability to create a collaborative central data repository is not hampered.

7. In Light of COVID-19, WSD Should Require Immediate Prioritization of Mitigation Measures to Prevent Outages in Vulnerable Communities.

WSD appropriately raises the potential impact of COVID-19 on implementation of the WMPs.⁶³ WSD state that “[e]lectrical corporations are expected to limit planned outage work during this time to wildfire mitigation, PSPS reduction, projects that immediately impact

⁵⁶ D.06-06-066, p. 40 (citing Pub. Records Act, Cal Gov. Code § 6250 *et seq.*, CA Constitution Art. 1, § 3(b).)

⁵⁷ D.06-06-066, p. 40.

⁵⁸ D.06-06-066, p. 65.

⁵⁹ D.06-06-066, p. 65.

⁶⁰ D.06-06-066, pp. 65-66.

⁶¹ D.06-06-066, p. 81.

⁶² D.06-06-066, p. 65.

⁶³ See Proposed Resolution WSD-002, p. 3.

reliability if delayed, and emergency/public safety outages.”⁶⁴ Given the shockingly disproportionate impacts COVID-19 is inflicting on communities of color in the US and in California, and the increased risks posed to low-income and vulnerable communities by outages, WSD’s mandate for WMP treatment of COVID-19 should go further. The appropriate mandate for COVID-19 is for the WMPs to document locations of vulnerable communities within their services territories, including disadvantaged communities and low-income communities. The WMPs should identify the lines that serve these communities and prioritize for immediate action all mitigation measures that will reduce the need for PSPS events in the 2020-2021 wildfire season. In addition, utilities should provide services to vulnerable communities in the event of a shutoff including coordination with organizations that provide food and other needs, and utilities should also work to provide all medical baseline customers with a method of self-generation using solar and storage to ensure that life-saving devices are available during a shutoff.

8. WSD’s Summary of CEJA’s Comments Is Incomplete.

WSD’s proposed resolutions summarize CEJA’s comments on the WMPs.⁶⁵ This summary, however, only lists a small subset of three of the ten overall critiques that CEJA made of the WMPs. As such, CEJA requests that the Resolution specify that the list of input of the commenters is clarified that it is only a summary of some of the points each commenter made.

9. Other Comments

- *Near Miss Incidents* – WSD states that it has concerns about SCE’s categorization of near miss incidents and ignitions.⁶⁶ WSD requires SCE to take action to determine the causes of near miss incidents.⁶⁷ As we described in our comments on the guidelines, the definition of “near miss” is vague and subject to different interpretations. We believe that additional clarity about what should be identified as a near miss would be helpful.

- *Definition of Initiatives* – WSD found that utilities inappropriately aggregated “initiatives into broader programs and reporting WMP required data at program levels instead of individually for each initiative.”⁶⁸ WSD uses the term “initiative” throughout its proposed resolutions,⁶⁹ yet, there is no definition of “initiative” and it is not clear what qualifies as a program and what

⁶⁴ Proposed Resolution WSD-004, p. 51.

⁶⁵ See, e.g., Proposed Resolution WSD-004, p. 5.

⁶⁶ Proposed Resolution WSD-004, p. 11.

⁶⁷ Proposed Resolution WSD-004, p. 17.

⁶⁸ Proposed Resolution WSD-002, p. 17.

⁶⁹ See, e.g., WSD Proposed Resolution 002, pp. 17-18.

qualifies as an initiative. A clearer definition would help ensure that WSD’s directions are not misinterpreted and that utilities understand the requirement to break programs into “individual initiatives.”⁷⁰

- *Situational Awareness* – CEJA’s initial comments requested that data be gathered to assess the effectiveness of additional situational awareness. In particular, we requested data on how utilities respond to ignitions, given their situational awareness. Notably, “PG&E agrees that this type of information is important.”⁷¹ Given the issues with risk efficiency tracking, we request that WSD require improved data and tracking of how increased situational awareness impacts operations.

- *Limit PG&E Microgrid Approval* – WSD rightly raises questions about the different measures utilities propose to mitigate PSPS events. In addition to the issues raised generally, the microgrid proposal in PG&E’s WMP is currently being addressed and limited within the microgrid proceeding in R.19-09-009. PG&E’s proposed microgrid project should be limited based on the Commission’s final decision in that proceeding, the impacts using diesel fuel has on communities, and the fact that sectionalizing the grid and other hardening measures can and should be used to effectively limit PSPS events.

CONCLUSION

For the reasons described above, CEJA recommends WSD provide additional clarification and analysis to ensure that communities are considered within the WMPs with more effective outreach, customer protection, transparency, and reporting.

Respectfully submitted,

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⁷⁰ See WSD Proposed Resolution 002, p. 21.

⁷¹ PG&E April 16, 2020 Reply, p. 3.

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