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 2020 WILDFIRE MITIGATION PLANS

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The California Environmental Justice Alliance ("CEJA") respectfully submits these comments in response to 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 Resolution WSD-001.

INTRODUCTION AND SUMMARY

Wildfires have the potential to become catastrophes. Certain communities throughout the state are less prepared and more vulnerable to wildfires 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 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 ("WSD"), and the Commission in its ratification duty, are charged with reviewing utility plans to mitigate the potential for catastrophic wildfires caused by utility equipment. The purposes of this review are to verify that the plans meet all current requirements. This review does not determine whether particular projects are just and reasonable; just and reasonableness review must take place in utility general rate cases. Assembly Bill 1054 requires that the review of utility plans be focused on those actions necessary to prevent catastrophic wildfires. As such, CEJA urges WSD and the Commission to

focus review on those elements of the plans necessary to meet the plain language of the statute and to mitigate the potential for catastrophic wildfires.

CEJA has ten general, overarching comments. First, we urge WSD and the Commission to require consideration of community risks as a factor when deciding the sequence of hardening activities. This will not increase costs and is necessary to ensure that more vulnerable communities are not last in line for hardening work, which at least one utility believes will take up to 10 years. Second, we urge WSD and the Commission to require more analysis to determine the effectiveness of inspections. Utilities are required to analyze the effectiveness of inspections, and we have not seen a systematic way of ensuring that the inspections are effective. Third, we urge WSD and the Commission to require utilities to start evaluating the effectiveness of situational awareness measures by requiring data that captures response times to wires down and ignitions and evaluates whether utilities are able to react quickly to mitigate potential disasters. Fourth, we request that utilities better integrate community feedback when designing resource centers. Fifth, we request utilities provide more outreach to customers after a fire to ensure that they are aware of available protections. We further request that utilities clearly define "impacted customer" so that customers can know in advance whether protections may apply. Sixth, we urge WSD and the Commission to reject PG&E's costly microgrids, and request that PG&E focus on other mitigation measures that will reduce PSPS incidents and duration. Seventh, we request that utilities better measure the impacts of their PSPS events and weigh those consequences when determining whether to call a PSPS event. In light of the coronavirus pandemic, it is absolutely vital that communities with populations who are more at-risk from the coronavirus not be put further at risk by de-energization. Eighth, we request that the utilities collaborate on vegetation management best practices, and use arborist judgement in tree removal. Ninth, we request that the 2020 WMPs be updated to reflect outreach requirements articulated in the recent Commission decision, and to require understanding assessments in languages beyond English and Spanish. Finally, CEJA requests that WSD establish a confidentiality process so that key information is shared.

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 move California in the right direction to mitigate the potential for catastrophic wildfires.

1. **When Determining the Order for Hardening Facilities, Utilities Should Prioritize Communities that Face a Higher Risk Due to Socio-Economic Factors. The Human Impact Should Not Be Ignored.**

AB 1054 requires the WMPs to include "[a] list that identifies, describes, and prioritizes **all** wildfire risks, and drivers for those risks."[1] 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.

The three largest utilities consider socioeconomic vulnerabilities to different extents, but none of them consider it systemically to facilitate meaningful prioritization and to ensure vulnerable communities are not left behind. 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.[2] 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 are taken into account.[3] PG&E considers the number of "customers living in proximity to that circuit," but it does not consider whether that population has increased vulnerabilities.[4]

CEJA agrees with the utilities that it is important to prioritize high fire-risk areas. In addition to this consideration, socioeconomic vulnerabilities, as California has stated, significantly increase the risk of catastrophe for certain populations due to wildfires. Failing to consider these risks is inconsistent with California policy and AB 1054's mandate to consider "all" risks related to wildfires. We request that the utilities amend their plans to clearly consider socioeconomic vulnerabilities when prioritizing hardening.

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[1] Cal. Public Util. Code § 8386(c)(10) (emphasis added).
[2] SCE Response to CEJA Question 2 (2/27/20). All the data requests referenced herein are available on the respective utility's website.
[3] SDG&E Response to CEJA Question 1 (3/4/20).
[4] PG&E Response to CEJA Question 4 (2/28/20).

As Senate Bill 32 (2017) recognizes, the state's most disadvantaged communities "are affected first and most frequently, by the adverse impacts of climate change, including an increased frequency of extreme weather events [, and] … disproportionately impacted by the deleterious effects of climate change on public health."[5] Certain populations, such as the state's most disadvantaged communities, are more vulnerable to the risks from wildfires because social vulnerability directly impacts a given population's "ability to prepare for, respond to, and recover" from a disaster such as a wildfire.[6] For example, certain populations already face conditions such as unhealthy air that make their vulnerability to wildfires and wildfire impacts worse.[7] In addition, certain populations often lack the resources necessary to relocate in the event of power outages, which can leave the power off when electricity needs are crucial, especially during dangerously hot or cold days.[8] Vulnerable populations also can lack the financial resources to be able to prepare for a wildfire and rebuild in the event of one.[9] As a threat multiplier, climate disasters exacerbate and amplify existing inequities, like substandard housing and inadequate healthcare.[10] Thus, when considering plans for mitigating wildfires, disadvantaged and low-income communities have unique energy-related risks and vulnerabilities that should be considered to mitigate the potential of a catastrophe. "[A] sole focus on

[5] SB 32 (2017).
[6] *See generally* Social Vulnerability to Climate Change in California: *A White Paper from the California Energy Commission's California Climate Change Center*, p. ii, July 2012, http://www.energy.ca.gov/2012publications/CEC-500-2012-013/CEC-500-2012-013.pdf
[7] U.S. EPA, Vulnerability Index Provides Public Health Tool to Protect Vulnerable Populations from Impaired Air, https://www.epa.gov/air-research/community-health-vulnerability-index-provides-public-health-tool-protect-vulnerable ("Breathing smoke from a nearby wildfire is a health threat, especially for people with lung or heart disease, diabetes and high blood pressure as well as older adults, and those living in communities with poverty, unemployment and other indicators of social stress.")
[8] *See* Rachel Morello-Frosch, et. al., *The Climate Gap*, p. 5 (2009), https://dornsife.usc.edu/pere/climategap/
[9] Davies IP, Haugo RD, Robertson JC, Levin PS (2018) The unequal vulnerability of communities of color to wildfire. PLoS ONE 13(11): e0205825, https://doi.org/10.1371/journal.pone.0205825
[10] *See* California Department of Public Health, *Climate Change and Health Equity Issue Brief*, p. 2, https://www.cdph.ca.gov/Programs/OHE/CDPH%20Document%20Library/CCHEP-General/CDPH_CC-and-Health-Equity-Issue-Brief.pdf.

biophysical wildfire hazards like fuel and weather conceals the root causes that turn fire, a natural process, into a disaster."[11]

The State of California has made it a priority to "[i]dentify and prioritize populations that are low-income and otherwise disproportionately vulnerable to climate impacts."[12] In fact, as Executive Order N-05-19 describes, "social vulnerability factors" should be "of equal importance" when determining wildfire risk as "dangerous fuel conditions, wind patterns, fire behavior, and other scientific indicators." This priority is based in part on a recognition that "[s]upporting communities' abilities to address climate hazards is crucial for increasing resilience."[13]

As described above, communities that are low-income, linguistically isolated, and already face other environmental risks are the most at risk from wildfires. Prior Commission decisions have defined disadvantaged communities as the top 25% most vulnerable communities in CalEnviroScreen, along with the census tracts that score in the top 5% of pollution burden, but do not have an overall CalEnviroScreen score.[14] "This definition has the advantage of being readily available, widely recognized, and simple to administer on a statewide basis."[15]

With regard to low-income communities, AB 1550 has identified those in "census tracts with median household incomes at or below 80 percent of the statewide median income or with median household incomes at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted pursuant to Section 50093."[16] This definition also is readily available and simple to administer.

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[11] Davies IP, Haugo RD, Robertson JC, Levin PS (2018) The unequal vulnerability of communities of color to wildfire. PLoS ONE 13(11): e0205825, https://doi.org/10.1371/journal.pone.0205825.

[12] Safeguarding California Plan: 2018 Update, p. 38, http://resources.ca.gov/docs/climate/safeguarding/update2018/safeguarding-california-plan-2018-update.pdf.

[13] *Id*.

[14] D.18-06-027, p. 16 (observing that in addition to Commission's routine reliance on CalEnviroScreen to define disadvantaged communities, "it is clear that the concept of "disadvantaged communities" as articulated in H&S Code § 39711 and implemented by CalEPA has become the standard for use by state agencies."); D.18-02-018; *see also* D.18-05-040, pp. 94-95 (using CalEnviroScreen); D.16-05-050, p.15; D.15-01-051, pp. 53-54.

[15] *See* D.18-02-018, p. 66.

[16] AB 1550 (2016).

By overlaying the definition of disadvantaged communities and low-income communities with areas of Tier 2 and Tier 3 wildfire risks, utilities can start to evaluate the communities within Tier 2 and Tier 3 that are likely to be at increased risk due to socioeconomic factors.

To help mitigate socioeconomic disparities, WMPs can and should prioritize hardening projects that are located in and improve the resilience of those communities that face the highest risk. Although SCE considers socioeconomic disparities for undergrounding, none of the IOUs consider socioeconomic factors for prioritizing all hardening. Specifically, CEJA recommends that:

(1) WMPs continue to prioritize hardening on tiered fire risk;

(2) Utilities identify communities that are low-income, disadvantaged, or otherwise more vulnerable to wildfires and power shut-offs; and

(3) WMPs prioritize these communities when hardening the system for each risk tier.

For example, if a utility identifies two communities of equal risk, and one is disadvantaged, the utility should prioritize the hardening work in the disadvantaged community.

This prioritization, which will not cost the ratepayers additional money, is necessary to start addressing the disparate risks certain populations face due to wildfires. Prioritization is also important where some plans will take up to ten years to execute.[17] Further, it is necessary to consider "all" wildfire risks, as required by AB 1024. These steps will help ensure that disadvantaged and low-income communities are not the last communities within their tiers to receive the hardening that is essential for mitigating risk of catastrophic wildfires. The incredible human risk these communities face should not be ignored.

2. Utilities Must Include an Evaluation of Different Inspection Practices to Identify Which Inspections Are the Most Efficient.

We urge WSD and the Commission to require more analysis to determine the effectiveness of inspections. Utilities are required to analyze the effectiveness of inspections, and we have not seen a systematic way of ensuring that the inspections are effective. AB 1054 importantly requires utilities to "[m]onitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, carried out under the

[17] PG&E, for example, states that its hardening program will take 10 years. *See, e.g.*, PG&E WMP, p. 8.

plan and other applicable statutes and commission rules."[18] To monitor and audit the effectiveness of inspections, the Commission needs measurements of how effective inspections are at identifying problems and preventing catastrophic wildfires.[19] As such, the Commission has required metrics and analysis "to determine the quality and effectiveness of all its inspection programs."[20] PG&E, SCE, and SDG&E all propose significant investments in different types of inspections. Problematically, however, it is still not clear how all the utilities are analyzing the effectiveness of all the different types of inspections techniques.

Indeed, there does not appear to be a systematic method for utilities to examine the effectiveness of all the types of inspections, as the Commission has required. SDG&E appears to have the most comprehensive program, but there are still gaps in its analysis. To audit its inspections, SDG&E has an "Electric Construction Supervisor visit[] the previously inspected structures in the following quarter and note[] any findings with their field audit with the documented results from the inspectors. If there are any findings, those are entered into an inspection and maintenance database where the additional audit finding can be resolved."[21] SDG&E randomly selects 1.5% of inspections to assess whether they are properly performed because it believes this value "captures a sufficient amount of inspections to audit."[22]

As related to its infrared inspection program, SDG&E states that "[g]iven that this is currently a pilot program, repairs resulting from these inspections are not estimated herein."[23] Although these infrared inspection programs do appear to result in findings,[24] it is not clear how many more issues these inspections identify than other types of inspection programs. This type of comparison and data is useful when examining the effectiveness of these various inspections programs. Based on this, we request that SDG&E measure the effectiveness of all its inspection techniques, even those that are pilot programs. Part of the purpose of pilot programs should be to determine how effective they are in preventing future wildfires. As for SDG&E's analysis, it is not clear whether 1.5% is reasonable given that we are still in the early stages of changing

[18] Cal. Public Util. Code § 8386(b)(19)(C).
[19] *See* D.19-05-037, p. 12 ("the Commission needs metrics that measure how effective the WSIP is in preventing catastrophic wildfires caused by utility ignitions").
[20] D.19-05-037, p. 12.
[21] SDG&E Response to CEJA Question 2 (March 4, 2020).
[22] SDG&E Response to CEJA Question 2 (March 4, 2020).
[23] SDG&E WMP, p. 99.
[24] *See*, SDG&E Response to CEJA Question 2 (March 4, 2020).

inspection practices. We would rather see a higher percentage of inspections in the early years, and this can be decreased after findings that the inspections are consistently on target. We further believe that SDG&E's random check post-inspection should be done for all types of inspections to determine both whether inspections such as infrared inspections are effective and whether field inspections are catching issues before they arise.

As for PG&E, its inspections showed a significant increase in findings. PG&E suspects that this is the result of many factors including more prescriptive inspection criteria, more conservative guidance, and additional inspection methods deployed.[25] It is not clear, however, how much these potential improvements helped inspections identify problems, and whether the inspections are more effective at actually identifying issues. PG&E appeared to have completed an audit of some of the inspections,[26] but it does not appear to separately analyze all types of inspections, or determine what type of inspection techniques may be more effective than other types of inspections. We request, similar to SDG&E, that PG&E complete this analysis in future WMPs, and that it analyze a set percentage of its inspections to determine whether they are consistently identifying issues.

As related to SCE, it does not provide an in-depth analysis of all inspection techniques, but at least has a separate body audit inspections.[27] We request that the other utilities also utilize a separate body to audit inspections. We further request that SCE provide real markers to determine whether inspections are improving, similar to our requests for SDG&E above.

It is still not clear why utilities go out for multiple inspections of the same equipment and whether effectiveness increases as a result of the different inspection techniques. As such, we request that utilities be given more explicit instructions of how to best measure the effectiveness of all their types of inspections so there is a uniform approach to develop best practices moving forward. Without an analysis of how effective past inspections have been, it is impossible to know what aspects need to be enhanced.

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[25] *See* PG&E Response to MGRA_004_Q10.
[26] PG&E Response to CEJA_003-Q02, Attach 3.
[27] SCE WMP, pp. 5-22-5-23.

3. Utilities Must Collect Data to Evaluate the Effectiveness of Situational Awareness.

A utility's response to and preparation for an ignition can make all the difference in whether an ignition is limited to a small area or creates a catastrophic wildfire. We urge WSD and the Commission to require utilities to evaluate the effectiveness of situational awareness measures in lowering response times to wires down and ignitions to ensure that utilities are able to react quickly to mitigate potential disasters. The plain language of AB 1054 focuses on minimization of the risk of "catastrophic" wildfires, providing that: "Each electrical corporation shall construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of *catastrophic* wildfire posed by those electrical lines and equipment."[28] AB 1054 further states that utilities' WMPs must include: "A description of the preventive strategies and programs to be adopted by the electrical corporation to minimize the risk of its electrical lines and equipment causing *catastrophic* wildfires, including consideration of dynamic climate change risks."[29] One of the best ways to stop a downed wire or an ignition from becoming catastrophic is to react quickly by deenergizing the lines, contacting authorities, and doing whatever is necessary to mitigate possible damage.

The utilities are not currently evaluating whether increased situational awareness is reducing the time it takes to respond to downed wires and ignitions. SCE's Situational Awareness does not currently focus on reducing response time to ignitions. As SCE states, it "does not measure response time to ignitions" and its weather stations, fuel sampling, weather modeling, and other situational awareness investments "are not intended to expedite response to an ignition."[30] PG&E states that: "Response time to ignitions is not currently being captured as a formal data point. The WSOC is exploring methods to capture response time information consistently and with quality so that trends can be tracked to support continuous improvements."[31] SDG&E states that "quantifying awareness is challenging" and that it "does not track the response time to ignitions."[32] We need more information to be able to better understand how best to employ additional situational awareness resources.

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[28] Cal. Public Util. Code § 8386(a) (emphasis added).
[29] Cal. Public Util. Code § 8386(c)(3) (emphasis added).
[30] SCE Response, to CEJA Question 1 (2/27/20).
[31] PG&E Response to CEJA Question 3, (2/28/20).
[32] SDG&E Response to CEJA Question 4 (March 4, 2020).

AB 1054 requires utilities to respond to issues and deficiencies when they occur to reduce the risk of a catastrophic event. To measure response time, it is important that the utilities start to develop data to measure utility response times. For example, while it is highly unlikely that ignition events will be eliminated, the utilities can take meaningful steps to ensure that ignitions do not lead to catastrophic wildfires. Data should be developed and collected to determine how a utility is reacting to ignitions. Some potential data are:

- How fast is a line de-energized after an ignition?
- How fast is a community notified after an ignition?
- How fast are CalFire and other relevant fire agencies notified after an ignition?
- How long does it take until the nearest crews are dispatched to the area?

These types of data are consistent with AB 1054's focus on utility responses and the type of metrics that have been proposed in the RAMP proceeding.[33]

4. Characteristics of Resource Centers Need to Be Developed Through a Community Driven Process.

AB 1054 requires WMPs to describe protocols for PSPSs that consider the impacts of a shutoff on public safety, and mitigate those impacts.[34] AB 1054 also requires WMPs to include protocols for supporting customers during and after a wildfire, and specifically for supporting low-income customers."[35]

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, WMPs must plan to mitigate the impacts of both wildfires and PSPS events utilities may trigger to avoid wildfires. Mitigation measures should include both fixed locations where community members can access resources, and mobile

[33] *See* CPUC, Risk and Safety Aspects of Risk Assessment and Mitigation Phase Report of PG&E, Investigation 17-11-003 (March 30, 2018), http://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/Safety/Risk_Assessment/RCR/SED_RAMP_Evaluation_PGE_033018a.pdf.
[34] Cal. Pub. Util. Code §§ 8386(c)(6), (18).
[35] 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.

resource centers that have the flexibility to enter an at-risk area and, if some community members are not able to move, provide services where they are.

As demonstrated by recent PSPS events, 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.[36] This phenomenon is not hypothetical, but has indeed already occurred: during the October 2019 PSPS events, PG&E's resource center for Alameda County was located in the Oakland Hills, far from low-income communities of color in East and West Oakland; was open only during daylight hours, and offered seating for 100 people, in a county with a population of more than 1.6 million.[37]

To address this type of failure, utilities should be required to be more responsive to communities. One particular concern is CRC accessibility via public transportation, especially from communities in PG&E's territory. PG&E did not provide an answer when questioned about whether resources centers were accessible by public transportation during the fires, and yet only 20 people accessed PG&E-supplied transportation during PSPS events.[38] We have analyzed the accessibility of PG&E's CRCs based on the information that is publicly available.[39] Based on PG&E's PSPS report for October 9, 2019[40], our analysis found that travel times to CRCs from disadvantaged communities PG&E identified for deenergization in Oakland ranged from 41 to 72[41] minutes one way. This was of particularly concern for areas like East Oakland, where some transit-dependent riders would have had to spend more than two hours outside, exposed to poor air quality, to reach and return home from Alameda County's sole CRC.

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[36] https://www.oaklandca.gov/news/2019/oakland-fire-safety-info.
[37] *Id.*
[38] PG&E Response to CEJA_003-006 (2/28/20).
[39] PG&E did not provide a response to a question related public transit accessibility. While it asserted the critical information is publicly available, only a fraction of the data regarding the census tracts or homes that were deenergized, and the actual transit performance at the times of deenergization, are publicly available.
[40] PG&E Public Safety Power Shutoff (PSPS) Report to the CPUC October 9-12, 2019 De-Energization Event, p. AppH-2 https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/PSPS-Report-Letter-10.09.19.pdf
[41] Historic AC Transit bus schedules and actual transit times are not available – research was based on current peak and off-peak schedules. http://www.actransit.org/maps/

We request that utilities ensure that CRCs be accessible by the population they are intended to serve. If they are intended to serve low-income populations that rely on public transportation, they must be accessible and in a reasonable distance from the population centers.

We further encourage utilities to find more indoor locations for future locations of CRCs, because, as PG&E states, tented locations are "susceptible to the outdoor elements based on design."[42]

In addition to these specific concerns, we request a more formal requirement that all utilities not only receive public comment on their response to PSPS events, but they integrate that feedback to change their practices to better meet community needs. We request this for several reasons.

First, because the communities are the experts in what they need, the community should guide the planning for CRCs, as well as for mobile services. In addition to deciding center locations, this community engagement process should decide when the CRCs will be available. For example, the utilities will be providing significant notice prior to a PSPS. How many hours in advance of the PSPS will the community need the centers to open so community can ensure medicines or other items that require continuous refrigeration are stocked? CEJA requests that the WMPs plan to work with affected communities to define where the CRCs should be sited and when they will be available. A number of issues arose with relation to the use of CRCs last cycle.

Second, in coordination with offices of emergency services, WMPs should entertain more expansive, or different, services at CRCs. These would include transportation to CRCs for community members in need, as described above. CEJA does not contemplate that CRCs would replace evacuation centers, and they are not anticipated to be open in close proximity to active wildfires. During Santa Ana winds and peak wildfire conditions, and when more distant fires cause outages to at-risk communities, communities often suffer poor air quality. Communities may choose that their CRCs therefore provide an indoor area with air filtration to allow a respite from high levels of particulate matter. More extensive needs might also include dispensing ice in coolers and N-95 masks, refrigeration for medically-necessary items, charging stations for phones and batteries to keep flashlights, radios and other equipment accessible, and access to communications that are not reliant on cell towers.

[42] PG&E Response to CEJA, 003-007 (2/28/20).

CEJA also supports WMPs contemplating deployment of mobile resources to areas that suffer outages either due to a PSPS or wildfire if an indoor location cannot be found. Mobile resources will be vital in the event people continue to be at risk from coronavirus when utilities turn to PSPS as a wildfire mitigation tool. The key is providing accessibility and availability of the necessary resources to ensure that the impacts are mitigated, and that people are able to avoid taking transit to, and gathering in large groups at, a resource center just to meet their basic electricity needs. CEJA would support expanding the scope of Community Outreach Vehicles, as specified by the particular communities they would serve. Although the details of what is included in the CRCs may be discussed in the de-energization proceeding, it is important that the WMPs contain a placeholder for developing CRCs through a community-driven process. Problematically, PG&E and SCE did not engage the communities until they chose the microgrid sites.[43] This needs to be remedied in future cycles.

With respect to both mobile and stationary resource centers, it is vital that generation be focused on renewable and storage to the greatest extent possible. Diesel backup generators should not be operating in areas that are already overburdened by pollutants, other local back-up diesel generation, and wildfires. Further, diesel supply chains may be interrupted, while solar to charge storage should be more reliable during peak fire conditions. Utilities should be instructed to investigate clean mobile generation options.

We further recommend more partnerships with organizations like Meals on Wheels during a PSPS event to help vulnerable customers. Neither SCE nor PG&E has such a relationship.[44]

5. Utilities Should Provide More Outreach to Customers After Fires, and WSD Should Track the Outreach and Services Provided.

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."[45] These requirements include

[43] SCE Response to CEJA Question 9 (2/26/20).
[44] SCE Response to Question 8 (2/27/20) (SCE does not have a partnership with an organization that provides direct food services); PG&E Response to CEJA-003-Q12 (2/28/20).
[45] Cal. Public Util. Code § 8386(c)(18).

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.[46]

Although utilities claim to be meeting the requirements of providing services to customers impacted by customers, CEJA has two concerns. First, based on data responses, it appears that actual in-person outreach to these customers is limited, and utilities rely primarily on web information and bill inserts or onserts. For example, SCE relies on its website updates, bill onserts (message on bills), and it states it "will update social media."[47] It further states it "will" perform outbound outreach and provide local assistance centers and outreach to community based organizations.[48] 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.[49] 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 understandable outreach in their language to understand what types of services may be available to them. We request that WSD require utilities to update their plans to include the requirements of the Commission's recent outreach decision.[50]

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." Although SCE states that it will apply the protections available to the account, it is

[46] D.18-08-004.
[47] SCE Response to CEJA Question 7 (2/27/20).
[48] SCE Response to CEJA Question 7 (2/27/20).
[49] PG&E Response to CEJA_003-Q11 (2/28/20).
[50] *See* D.20-03-004.

unclear what this means.[51] 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 employment being impacted."[52] In other words, PG&E does not engage in any proactive outreach about this, and no set description of when protections apply.

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. Self-certification is important when customers have lost access to their financial documentation.

6. PG&E's Proposed Fossil Fuel Microgrids Should Be Rejected.

For at least three reasons, the WSD and the Commission should reject outright PG&E's costly microgrids proposal. First, the microgrids will increase harmful air emissions in communities already breathing unhealthy air; second, the microgrids will increase greenhouse gases inconsistent with the State's climate goals and requirements; and third, they are not as efficient at mitigating PSPS events as other hardening measures. Given the high cost of microgrids, environmental impacts, and uncertain timelines, CEJA requests instead that PG&E focus on other mitigation measures that will better reduce PSPS incidents and duration than the expensive, polluting microgrids that PG&E is planning.

Initially, the WSD and the Commission should reject PG&E's costly microgrids proposal because of the impact that it will have on air quality. PG&E's microgrids will rely on either polluting fossil fuels or biodiesel, both of which would increase air emissions in communities throughout their territory. While longer-term, PG&E's DGEMS projects will likely rely on natural gas generation and procurement of biomethane, and the immediate, temporary deployment is likely to rely on diesel and biodiesel fuels.[53] Many communities in PG&E's territory are already breathing unhealthy air as the Bay Area, where the majority of these projects would be deployed, is in nonattainment for both ground-level ozone and particulate matter.[54] These proposed additional pollution sources would exacerbate the already unhealthy air.

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[51] SCE Response to CEJA Question 7 (2/27/20).
[52] PG&E Response to CEJA-003-Q11 (2/28/20).
[53] PG&E Response to CEJA Data Request 003-Q01 (2/28/20).
[54] https://www3.epa.gov/airquality/greenbook/anayo_ca.html

Biofuels such as biomethane and biodiesel are not clean alternatives. Although biomass and diesel facilities are often not as large as other generating facilities, their impact on local communities can be more significant because these facilities often do not have the same level of pollution controls, because the fuels can be inherently dirtier, and because the emissions from these facilities may not disperse as widely as the pollutants from other facilities. For example, one study found that the ratio of delivered energy to inhaled pollutants are far worse for distributed combustion generators than for central generators, in part because they are sited in urban locations and emit pollutants that are dispersed less and inhaled more.[55] In addition, biomass combustion can have higher criteria pollutant emissions than gas plants. [56] To the extent diesel backup generating facilities ("BUGs") form part of the DGEMS projects, the impacts from diesel BUGs are widely documented. Unfortunately, the vast majority of diesel backup generation is not controlled.[57] Because of both their feedstock and their lack of controls, diesel BUGs have substantially greater emissions of NOx and PM than any other power generation technology.[58]

With respect to GHG emissions, biomass generation can be three to four times more carbon-intensive than natural gas-fired generation.[59] As Commission staff itself has found, biofuel facilities, especially small facilities that do not have proper pollution control technology, are a significant source of localized harmful air pollution.[60] Indeed Commission staff recommended that the Commission "prioritize reducing these sources, especially in [disadvantaged communities]."[61] The Commission and WSD should not now authorize new

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[55] Heath, Garvin A., and William W. Nazaroff. "Intake-to-delivered-energy ratios for central station and distributed electricity generation in California." *Atmospheric Environment*41.39 (2007): 9159-9172.

[56] Institute for Policy Integrity, Air pollution from biomass energy (updated April 2011), https://www.pfpi.net/wp-content/uploads/2011/04/PFPI-air-pollution-and-biomass-April-2011.pdf

[57] https://www.energy.ca.gov/reports/2002-02-15_500-01-028.PDF (survey of BUGs showing that the majority are not controlled).

[58] https://www.energy.ca.gov/reports/2002-02-15_500-01-028.PDF

[59] *See* R.18-07-003, Informal Comments of Center of Biological Diversity, Sierra Club, and the Partnership for Policy Integrity on the Biomat Program Review and Staff Proposal (Dec. 7, 2018) (citing sources).

[60] R.16-02-007, November 6, 2019 ALJ Ruling Seeking Comment on the Proposed Reference System Plan, Attachment B, Slide 39.

[61] R.16-07-002, November 6, 2019 ALJ Ruling Seeking Comment on the Proposed Reference System Plan, Attachment B, Slide 39.

polluting gas facilities that exacerbate localized pollution and its impacts and increases GHG emissions in the state. Because these forms of generation would have significant emissions and air quality impacts, PG&E's plan is likely to have to undergo scrutiny under environmental laws. Environmental permitting and analysis take time, and it is unlikely the DGEMS could be ready by the timeline that PG&E anticipates meeting.

Further, PG&E should be focusing its efforts on sectionalizing and other grid-harden measures, rather than pursuing a pathway that is likely to cause already unhealthy conditions to worsen for affected residents. PG&E's study show that hardening and sectionalizing can effectively reduce the magnitude of PSPS events on the grid.[62] In fact, in one scenario, PG&E found that sectionalizing had the possibility of reducing PSPS events by 204,000 customers, while microgrids, in that scenario, only reduced PSPS events by 33,000 customers.[63]

Given all these concerns, we request that PG&E rely on clean energy solutions and grid hardening to reduce PSPS events rather than polluting generating stations.

7. Utilities Need to Consider the Consequences of PSPS Events to Better Evaluate the Public Safety Risks.

Utilities must better measure the impacts of their PSPS events and weigh those consequences when determining whether to call a PSPS event. This is particularly vital in light of the coronavirus pandemic. After an "outage reporting" incident such as a PSPS, utilities must engage in "activities to support customers" including "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."[64] None of these efforts to make customers whole can compensate for the consequences of a PSPS.

Consequences of a PSPS can be very serious – at its most serious, lack of electricity foreseeably imperils peoples' lives by depriving them of life-sustaining equipment or forcing them to expose themselves to coronavirus by abandoning shelter in place efforts to access electricity.

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[62] *See* PG&E Feb. 18, 2020 Presentation, *available at* https://www.cpuc.ca.gov/wildfiremitigationplans/

[63] *See* PG&E Feb. 18, 2020 Presentation, *available at* https://www.cpuc.ca.gov/wildfiremitigationplans/

[64] Cal. Public Util. Code Section 8386(c)(18).

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. And for the 2020 WMPs, it is vital to understand the role that elevated air pollution, and underlying respiratory issues, play in increased vulnerability. As reported in March 2020, "[b]reathing unclean air is linked to high blood pressure, diabetes, and respiratory disease, conditions that doctors are starting to associate with higher death rates for COVID-19… . Physicians say that people with these chronic conditions may be less able to fight off infections and more likely to die of the disease."[65]

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 pollutants when air quality may already be compromised, as described above.[66]

Given this reality, the plans should consider additional information about the impacts of PSPS events on specific communities when making the decision to de-energize those communities. This information should be quantified in advance of fire season, and should be incorporated into decisionmaking around whether to trigger a PSPS event. Some examples of this type of information include: the number of medical baseline customers impacted,[67] the numbers of community members who do not speak English impacted, the numbers of community members living in poverty impacted, and the number of community members without a car that are impacted.

SDG&E, SCE and PG&E compile different information about communities' vulnerabilities. Each WMP includes, for example, data about medical baseline customers, and varying degrees of mitigation for those customers in the event of a PSPS. None of the plans we reviewed discuss community characteristics in the decisionmaking around PSPS events.

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[65] https://grist.org/justice/one-more-way-the-world-wasnt-prepared-for-coronavirus-air-pollution/

[66] *See e.g.*, https://www.sfchronicle.com/california-wildfires/article/During-PG-E-outages-generators-caused-fires-14833601.php

[67] This information was already ordered to be shared with Tribal and other governmental entities, and included in the 2020 WMPs to one degree or another (PG&E WMP Appendix 6); https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2019/Letter%20on%20Medial%20Baseline%20Customers.pdf

SDG&E comes the closest, in discussing its efforts to reduce PSPS events to elementary schools and previously-deenergized customers.[68] SCE includes, in its PSPS tactical considerations, "[e]xpected impact of de-energizing circuits on essential services such as public safety agencies, water pumps, traffic controls, etc."[69] These WMPs do not, however, include the key assessment of impacts to communities in their decisionmaking process for whether to trigger a PSPS. April snowpack measurements suggest the 2020 wildfire season is likely to begin sooner than projected.[70] Given the potential that the coronavirus pandemic will still be impacting California when the 2020 fire season begins, it is absolutely vital that the utilities be required to avoid de-energization of vulnerable communities.

8. Utilities Should Collaborate on Best Vegetation Practices and Continue to Use Arborists to Judge Whether Trees Should Be Cut Down.

The three investor owned utilities propose enhanced vegetation management. While enhanced inspections and situational awareness of vegetation is likely reasonable, it is not clear that cutting down significantly more trees is reasonable. This new enhanced vegetation management approach that would require cutting down significantly more trees has largely not been shown to be necessary or reasonable to the scope requested in the WMPs in light of the consequences of cutting down trees that may be providing support for other trees, reducing carbon, and other important ecological benefits. In addition to not having been shown to be necessary, each of the utilities have very different approaches to vegetation management, and while utility have different territories, there should be a more proactive approach to ensuring that utilities are continuing to develop best practices and are not needlessly cutting down trees that pose little risk. For example, SCE has developed a "Tree Risk Calculator" and conducts training on how to apply this calculator.[71] While at the same time, PG&E has withheld the information that it gives arborists as confidential.

Further information and evidence is necessary before thousands of healthy trees are cut down or utilities cut trees to maintain a significantly larger clearance. Before the Commission gives utilities wide latitude to cut down thousands of trees, more work and direction is necessary

[68] SDG&E WMP, pp. 134-135.
[69] SCE WMP, p. 214.
[70] https://www.sfchronicle.com/environment/article/California-s-winter-goes-down-as-one-of-the-15172881.php
[71] SCE Response to CEJA Question 3 (2/26/20).

to specify how the decisions should be made and what clearances should be used. There also needs to be more work done to determine what to do related to trees that might be diseased. As it stands now, utilities have developed their own metrics and plans for how to analyze tree cutting operations. Although these metrics can be a starting point, Commission direction and evaluation is needed.

We have two main requests related to vegetation management. First, we request that utilities work together to proactively share data related to vegetative management practices to narrow the scope of trees that are removed through continued development of best practices. Second, we request that utilities continue to utilize an arborist when decided whether to remove trees because ecosystems differ, and trees need to be judged in the place they stand.

We are particularly concerned that PG&E appears to be moving away from professional judgment. PG&E states that in March 2020 "PG&E will be moving toward a new tree risk evaluation tool named the Tree Assessment Tool that is similar to HTRS, but removes all judgment from the arborist by calculating an abate or non-abate score."[72] We request that WSD reject PG&E's change and require PG&E to rely on the judgment of a professional arborist.

9. Outreach and Assessment of Outreach Need to Be Modified in the WMPs to Reflect the Recent Commission Decision.

Although utilities have improved their outreach since the last cycle, there are still areas needed for improvement. Public awareness, achieved through accessible transparent information, is essential for ensuring that all communities, including those facing language and other barriers, are aware of potential wildfire or de-energization events that could impact them. Public outreach and awareness are also necessary to mitigate wildfire risks in the event of an ignition. As SDG&E recognizes, "customers, elected officials, non-profit support organizations, and first responders all play a vital role in achieving wildfire prevention and mitigation."[73] In particular, outreach before and during a wildfire are critical, especially in areas that have vulnerable populations and are subject to a high wildfire risk because outreach during a wildfire can provide the critical notification necessary for a customer to evacuate.[74] Outreach before a

[72] PG&E Response to CEJA-003-005 (2/27/20).
[73] SDG&E WMP, p. 8.
[74] *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 benefits of increased outreach).

potential disaster can build trust, which can help ensure strong communication in the event of a wildfire.[75] 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."[76] SB 901 also separately requires "protocols related to mitigating public safety impacts of" de-energization events.[77]

In light of these facts, CEJA requests that utilities update their WMPs to reflect the requirements of the recent Commission decision related to languages, types of outreach, and assessment of outreach. Further, utility assessments of understanding should be conducted in other languages other than Spanish and English. Assessments of understanding needs to be conducted in other languages. PG&E's assessment only was conducted in Spanish and English.[78]

10. WSD Needs to Develop a Process Related to Confidentiality.

In response to CEJA's data requests, PG&E marked some of the information as confidential, stating that it believes the information is proprietary for its business operation. The basis of the confidentiality designation or the process for challenging such a designation is not clear. As such, we request that 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. The approach that the Commission utilized for procurement information is instructive.

In the midst of rampant market manipulation that harmed utilities, ratepayers, and the public, the Legislature passed Assembly Bill ("AB") 57,[79] which added Section 454.5(g) of the

[75] *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).
[76] Cal. Public Util. Code § 8386(b)(16)(B).
[77] Cal. Public Util. Code § 8386(b)(6).
[78] PG&E Response to CEJA-003-010.

[79] D.06-06-066, pp. 40-41 ("The statute [AB 57], signed in 2002, was conceived in the midst of the state energy crisis.").

Public Utilities Code. That provision requires the Commission to:

> adopt appropriate procedures to ensure the confidentiality of any market sensitive information submitted in an electrical corporation's proposed procurement plan or resulting from or related to its approved procurement plan, including, but not limited to, proposed or executed power purchase agreements, data request responses, or consultant reports, or any combination of these . . . .[80]

Two years later, in 2004, SB 1488 required the Commission "to ensure that the commission's practices under these laws provide for meaningful public participation and open decision making."[81] Accordingly, in Rulemaking ("R.") 05-06-040, the Commission developed procedures to ensure confidentiality of market-sensitive information, issuing D.06-06-066 in 2006, which was then modified in three subsequent decisions, D.06-12-030, D.07-05-032 nd D.08-04-023.[82] Combined, these decisions establish the rules that govern confidentiality today. In D.06-06-066, the Commission acknowledged the influence that the energy crisis had on its development of the rules and the need to protect the public against future market manipulation.[83]

Under D.06-06-066, the Commission "starts[s] with a presumption that information be publicly disclosed and that any party seeking confidentiality bears a strong burden of proof."[84] 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 public forum."[85] Indeed, according to the Commission, "[a]llowing public access to documents is part and parcel of an open decision making process."[86] Furthermore, the Commission clearly stated that it should

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[80] Pub. Util. Code § 454.5(g).
[81] Senate Bill No. 1488 (2004 Cal. Stats., Ch. 690 (Sept. 22, 2004)).
[82] CPUC, D.06-06-066, *Interim Opinion Implementing Senate Bill No. 1488, Relating to Confidentiality of Electric Procurement Data Submitted to the Commission*, Rulemaking 05-06-040, p. 73 (June 29, 2006) ("D.06-06-066"); CPUC, D.08-04-023, *Decision Adopting Model Protective Order and Non-Disclosure Agreement*, Rulemaking 05-06-040 (Apr. 10, 2008); CPUC, D.07-05-032, *Order Modifying Decision 06-06-066 and Denying Rehearing of the Decision, as Modified*, Rulemaking 05-06-040 (May 3, 2007); CPUC, D.06-12-030, *Decision Defining "Market Participant" and "Non-Market Participant" for the Purposes of Access to Confidential Documents*, Rulemaking 05-06-040 (Dec. 14, 2006).
[83] D.06-06-066, pp.4-5; 17-18; 40-41; 76-77.
[84] D.06-06-066, p. 2.
[85] D.06-06-066, p. 40 (citing Public Records Act, Cal Gov. Code § 6250 *et seq*., California Constitution,
Article 1, § 3(b).
[86] D.06-06-066, p. 40.

err on the side of public disclosure in instances where the public has shown a strong interest in the issue. For example, it stated in D.06-06-066 that "[g]reater public access should be provided for procurement documents because of the public interest aspects of the [RPS] program"[87]

Recognizing the high risk of over-designating information as "confidential," the Commission stated that "the requirement that parties show that their data meet the criteria we establish here must have teeth."[88] It perceived that "[i]f 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."[89] 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."[90] "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."[91] It also clarified that it intends for parties to "treat confidentiality designations with care."[92]

Similar to the Commission's reasoning in the above decisions, the public has a strong interest in having access to the Wildfire Mitigation Plans. 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.

CONCLUSION

For the reasons described above, CEJA recommends that the 2020 WMPs be revised to: (1) prioritize hardening measures for communities with socioeconomic vulnerabilities; (2) provide for analysis of inspection practices; (3) require data collection regarding effectiveness of situational awareness; (4) specify community-driven process for determining stationary and mobile resource centers; (5) improve post-fire outreach services and tracking; (6) remove

[87] D.06-06-066, p.4; see also p.71.
[88] D.06-06-066, p. 65.
[89] D.06-06-066, p. 65.
[90] D.06-06-066, pp. 65-66.
[91] D.06-06-066, p. 81.
[92] D.06-06-066, p. 65.

PG&E's DGEMS proposal; (7) consider and prioritize vulnerable communities in PSPS decisionmaking; (8) provide for utility collaboration on vegetation management best practices and use of arborist judgement in tree removal; (9) reflect outreach needs and requirements; and (10) have WSD establish a confidentiality process.

Respectfully submitted,

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By: /s/ Shana Lazerow

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