

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
(Issued October 25, 2018)

EAST BAY MUNICIPAL UTILITY DISTRICT COMMENTS ON PACIFIC GAS AND ELECTRIC COMPANY'S WILDFIRE MITIGATION PLAN

In accordance with the guidance provided in Resolution WSD-001, establishing procedures for the Wildfire Safety Division's review of 2020 Wildfire Mitigation Plans (WMP) pursuant to Public Utilities Code sections 8386 and 8386.3, East Bay Municipal Utility District (EBMUD) respectfully submits the following comments on the 2020 Wildfire Mitigation Plan of Pacific Gas and Electric Company (PG&E).¹ As directed, these public comments are submitted to the Director of the Wildfire Safety Division, and served on the R.18-10-007 service list.

I. Introduction

EBMUD is a California municipal utility district providing critical water supply services for 1.4 million people and wastewater services for 685,000 people in the eastern San Francisco Bay Area. We have participated actively in the California Public Utilities Commission (Commission) Wildfire Mitigation Plan and De-energization proceedings, and have provided specific recommendations (some of which are reiterated below) for policies to enable effective coordination between critical service providers and the utilities before, during and after wildfires and Public Safety Power Shutoff (PSPS) events.

We appreciate the concerted efforts of the Wildfire Safety Division and the Commission to ensure that the 2020 WMPs incorporate lessons learned during the 2019 wildfire season. As we prepare for a dry year wildfire environment in 2020, with the added challenges of the current COVID 19 crisis, clear requirements and ongoing oversight can help minimize avoidable risks and optimize coordination.

¹ Pacific Gas and Electric Company Updated 2020 Wildfire Mitigation Plan Report, February 28, 2020 (PG&E WMP).

EBMUD offers the following specific recommendations for improvements to PG&E's 2020 WMP.

II. Prioritization for distribution system hardening should include consideration of PSPS mitigation for critical infrastructure

In refining its risk modeling and prioritization for system hardening efforts, PG&E notes that it "hopes to include other risks into the analysis including PSPS mitigation."² EBMUD agrees that PSPS mitigation should be included as criteria for distribution system hardening efforts. In addition, the criteria should also be weighted to prioritize hardening in areas where there is critical infrastructure, such as hospitals or water treatment plants, which may potentially adversely impact the health and safety of a large number of customers in the event of PSPS.

III. Coordination with Public Safety Partners should include a specific commitment to meetings before, after and during wildfire season.

The 2020 PG&E WMP states that PG&E's Emergency Preparedness Outreach will include "one-on-one meetings to have more localized discussions and listening sessions with jurisdictions and agencies impacted by previous PSPS events" and "more robust" PSPS tabletop planning exercises with County Offices of Emergency Services (OESs), tribes and other public safety partners.³

This is a good start, but it does not include the kind of specific commitments necessary to ensure effective communication between PG&E and a critical water and wastewater provider. The WMP should commit PG&E to holding meetings with Public Safety Partners (particularly agencies providing critical services) each year. At a minimum, there should be one meeting before wildfire season begins, and another within one month after wildfire season ends. The pre-wildfire season meeting will ensure that effective coordination procedures are in place, and enable the utility and critical service provider to trouble-shoot issues that may arise in the months to come. The post-wildfire season meeting will enable the parties to discuss specific lessons learned and develop corrective measures while memories are fresh and there is adequate time to prepare for the following year.

² PG&E WMP p.5-144.

³ PG&E WMP p.5-235. See also general reference at page 5-292 to "on-going engagement" and plans to coordinate with critical service providers. This reference does not mention water and wastewater service providers.

PG&E should also expressly commit to meet and otherwise communicate directly with Public Safety Partners on an “as needed” basis during wildfire season. Such meetings (in person or telephonic) will be needed, for example, if wildfire conditions are threatening a Public Safety Partner’s service area, if a PSPS event is planned, etc.

IV. Notification requirements should include a commitment to provide circuit level information

The WMP provides that public safety partners such as water agencies will receive the following notifications and support by PG&E during PSPS events: “Notification in advance of residential customers for preparedness efforts; Maps of potentially impact[ed] areas in advance of customers; and Dedicated single points of contact to communicate frequently via live calls for situation awareness updates and operational support.”⁴

Again, the general statements above do not contain an adequate level of commitment to ensure actionable coordination and risk mitigation. The WMP should at a minimum specify that PG&E will provide a critical services provider like EBMUD with maps of potentially impacted areas that include circuit level details. These maps should be timely updated with forecasting changes. Without such detail, it is very difficult to effectively prepare for a PSPS event. PG&E should also commit to providing and updating a tabular listing of affected facilities with anticipated de-energization times indicated.

V. Re-energization requirements should specify obligation to coordinate with Public Safety Partners

The WMP’s discussion of Re-Energization Strategy does not include any detail regarding PG&E’s coordination or communications with critical service providers like EBMUD.⁵ We realize that the Commission is currently considering additional PSPS Guidelines for re-energization in Rulemaking 18-12-005, and encourage the Commission to require the utilities to conform their 2020 WMPs to the final PSPS Guidelines, once they are adopted.

With respect to re-energization, EBMUD supports the proposed requirement that Public Safety Partners receive timely notice of re-energization. Such notices should be updated as

⁴ PG&E WMP p.5-237.

⁵ See PG&E WMP p.5-297.

needed, and provide water and wastewater agencies like EBMUD adequate time to prepare for re-energization. Even an hour's prior notice can help avoid impacts to water infrastructure and system operations. It can also enable coordination and prioritization in the event that multiple lines are being re-energized within a brief period of time.⁶

VI. Conclusion

EBMUD appreciates the Commission's consideration of these comments.

DATED: April 7, 2020

Sincerely,

/s/

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⁶ See [East Bay Municipal Utility District Comments on Proposed Additional and Modified De-Energization Guidelines](#) (February 19, 2020) pp.3-4.