



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

April 6, 2020

Ms. Caroline Thomas Jacobs
Director, Wildfire Safety Division
California Public Utilities Commission, Wildfire Safety Division
505 Van Ness Avenue
San Francisco, CA 94102

Transmittal Via E-mail: wildfiresafetydivision@cpuc.ca.gov & Service List of R.18-10-007

RE: 2020-2022 Wildfire Mitigation Plans

Dear Ms. Jacobs:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to comment on the 2020-2022 Wildfire Mitigation Plans (WMPs or Plans). RCRC is an association of thirty-seven rural California counties, and our Board of Directors is comprised of elected supervisors from each of those member counties. RCRC has been a party to the *Order Instituting Rulemaking to Implement Electricity Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018)* since March 21, 2019.

Our member counties contain much of California's forested lands, including more than 70 percent of the State's national forest lands. Rural communities are at the epicenter of the "new normal," having historically borne the lion's share of destruction caused by high severity wildfires. Wildfire risk is becoming a wider public safety concern as the wildland urban interface spreads over larger areas of the State due to climate change and the lingering impacts of the recent five-year drought.

RCRC has a broad interest in minimizing the risks of catastrophic wildfire and the implementation of Senate Bill 901 (Dodd, 2018) and Assembly Bill 1054 (Holden, 2019). Federal, state, and local government partners have been actively engaged to undertake coordination efforts across jurisdictional lines to protect life and property from preventable wildfire events. Local governments and residents — both taxpayers and ratepayers — have experienced great financial hardships in attempting to recover from catastrophic wildfire events and implementing home hardening measures and maintaining defensible space.

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RCRC emphatically believes the fundamental public policy goal surrounding utilities and wildfire should be the ultimate safeguarding of California's residents from future harm resulting from a utility-caused wildfire event. RCRC takes a holistic approach to reducing the risk of catastrophic wildfires, including utility-caused ignitions, and is an active participant in multiple regulatory proceedings at the California Public Utilities Commission (CPUC) that are interrelated to public safety and community resiliency. For example, RCRC has party status regarding Public Safety Power Shutoffs (PSPS), Emergency Disaster Relief, the Self-Generation Incentive Program (SGIP), and Microgrids.¹ RCRC is also active in forest management issues and regularly participates on the Forest Management Task Force—under the umbrella of both the California Natural Resources Agency and Environmental Protection Agency—created by Executive Order to restore forests and renew aggressive forest management practices for environmental quality and resiliency.²

We appreciate the work of the CPUC over the last year to develop metrics and templates to not only standardize WMPs across utilities for the sake of comparison, but also acknowledge that WMPs are not a mere checklist or regurgitation of data from various other compliance pathways that do not give any context or evaluative effort to reduce wildfire ignitions on electrical equipment. These Plans must measure outputs and have auditable metrics, and we look forward to those metrics and templates coming to the fore in the future.

RCRC offers comments on various utility Wildfire Mitigation Plans (WMPs) 2020-2022 through the issues outlined below, which are of importance to rural local governments.

2019 Lessons Learned

It perhaps goes without saying that the 2019 Public Safety Power Shut-offs (PSPS) employed by investor-owned utilities (IOUs), most acutely by Pacific Gas & Electric (PG&E), were a wholesale failure in their execution. While we will not re-litigate all of rural local governments' grievances and experiences, it has become clear that a robust undertaking on templates and metrics needs to be done for PSPS "after-action" reports to delve deeper into qualitative and quantitative insight into these last-resort events. We have also experienced that Community Resource Centers (CRCs) have been too few, too far apart, and open too few hours to mitigate risks for vulnerable residents during a de-energization event.

¹ *Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions*, R.18-12-005; *Order Instituting Rulemaking Regarding Emergency Disaster Relief Program*, R.18-03-011; *Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues*, R.12-11-005; and *Order Instituting Rulemaking Regarding Microgrids Pursuant to Senate Bill 1339 and Resiliency Strategies*, R.19-09-009 respectively.

² Governor Brown, Executive Order B-52-18

The key takeaway from the events of 2019 is that enhanced notification and communication between utilities and local governments *must* occur on many fronts, but specifically prior to, during, and after a de-energization event. We look forward to decisive action from the CPUC to ensure cooperative efforts are being taken to this effect. We also expect utilities to more proactively engage with local governments to assess and plan specific needs and locations to site CRC's to fit the needs of impacted communities. Finally, we believe that utilities need to proactively consult with local elections officials to ensure that PSPS events conducted contemporaneously with elections and while results are being tabulated, do not impair the conduct of those proceedings.

Inspection and Maintenance

In general, asset management and inspections are well articulated by the three large investor-owned utilities. RCRC appreciates Southern California Edison's (SCE) long-term approach to integrate inspection activities with other asset strategies to not only achieve reliability and safety, but also to promote affordability for ratepayers.³

We are encouraged by PG&E's intention to complete detailed overhead inspections of transmission and distribution lines in all Tier 3 High Fire Threat Districts (HFTDs) in 2020, but are concerned that they have completed only one-third of these needed inspections in Tier 2 HFTDs in 2020.⁴ We request all utilities report on inspecting non-overlapping U.S. Forest Service-CAL FIRE Tier 1 High Hazard Zones for wildfire mitigation above the requirements of CPUC General Order 165.

Further, PG&E's new technology proposal to create a historical database of images appears promising for enhanced asset inspections. This "Sherlock" and "Waldo" system may have the added benefit of accountability for inspections and proof of maintenance over time.⁵

System Hardening

We strongly support the "portfolio" approach to minimize the risk of fire and reduce the need for PSPS events that blends segmentation, system hardening, sectionalization, exclusion of low-risk facilities, deployment of microgrids, and improved weather monitoring. We are especially interested in the utilization of microgrids and SGIP funds to improve local resiliency where appropriate, although we realize that there are inherent limitations to both of those options.

We support SCE's development of a customer resiliency equipment incentive program to provide financial support to customers willing to increase resiliency within a high fire risk area. By targeting customers who already have solar and storage on site (or where storage can be added to existing solar systems), those facilities will be able to

³ Page 134, SCE 2020-2022 Wildfire Mitigation Plan.

⁴ Page 5-156, PG&E 2020-2022 Wildfire Mitigation Plan.

⁵ Page 5-21, PG&E 2020-2022 Wildfire Mitigation Plan.

provide broader community benefits during a PSPS event, especially when those customers are large sites like schools, local government facilities, and large retailers.

We are also supportive of PG&E's efforts to improve system resiliency by deploying back-up generators at sub-stations that can continue safely operate and provide power to customers during a PSPS event.

We understand changes are being contemplated to the Rule 20A program in the Legislature and in a separate CPUC proceeding, like whether undergrounding allocations should be prioritized in high fire areas.⁶ To the extent possible, utilities need to consider undergrounding wires as a grid design and system hardening solution. Liberty CalPeco, for example, does not necessarily consider undergrounding as an alternative outside the Rule 20 program.⁷ We urge them to proactively consider undergrounding where feasible as a safety measure, either within the confines of the Rule 20A program or as a separate program for wildfire safety like other large utilities. SCE, for example, acknowledges that covered conductor is oftentimes faster and more feasible to deploy than undergrounding solutions, but SCE is still planning to convert to undergrounding wires in select areas.⁸ PG&E is appropriately considering undergrounding overhead distribution lines along main egress routes that could otherwise block evacuation efforts or first responder access if overhead circuits or poles are downed.⁹

Regarding Expulsion Fuse Replacements, it is unclear how long it will take PG&E to replace non-exempt hardware to reduce sparks in response to CAL FIRE recommendations. For example, PG&E indicates it will replace 625 fuses/cutouts per year, but does not indicate how many total fuses/cutouts need to be replaced or over what period of time this replacement can be fully implemented.¹⁰ Liberty CalPeco has indicated it will take them until 2026 to fully complete this work.¹¹ To compare, San Diego Gas and Electric (SDG&E) has identified a total of 11,000 expulsion fuses that need to be replaced, which will be completed by 2022.¹²

Vegetation Management Plan

The success or failure of vegetation management efforts will significantly contribute to the conditions that necessitate a PSPS event. Without robust, long-term, on-going vegetation management efforts, PSPS will transform into an over-utilized tool to mitigate shareholder risks, not necessarily safeguard communities. While technology will continue to evolve—as seen with covered conductors, sectionalization capabilities, and high-definition meteorology and cameras—trees and bushes are going to grow year after

⁶ R.17-05-010, *Order Instituting Rulemaking to Consider Revisions to the Electric Rule 20 and Related Matters*

⁷ Page 64, Liberty CalPeco 2020-2022 Wildfire Mitigation Plan.

⁸ Page 66, SCE 2020-2022 Wildfire Mitigation Plan.

⁹ Page 5-141, PG&E 2020-2022 Wildfire Mitigation Plan.

¹⁰ Page 5-121, PG&E 2020-2022 Wildfire Mitigation Plan.

¹¹ Pages 58, Liberty CalPeco 2020-2022 Wildfire Mitigation Plan.

¹² Page 76, SDG&E 2020-2022 Wildfire Mitigation Plan.

year and will need continuous pruning to maintain safe clearances and reduce fuel-load on our forest floors and rights-of-way.

While vegetation management efforts have ramped up significantly over prior years, utilities must consider long-term sustainable vegetation management approaches and be able to timely respond to the effects of climate change, such as the large die-off of trees from the five-year drought and destructive bark beetles.¹³ This includes having a robust, well-trained workforce and the ability to hire contractors to ramp up vegetation treatment during or after extreme climate conditions such as a severe drought or invasive pests.

PG&E states, “Actions such as vegetation management, equipment repairs, and line hardening are expected to materially reduce the risk, number and extent of wildfires — but at the same time, climate change-driven factors such as drought, wind patterns, bark beetles and others may increase that risk and counteract our efforts.”¹⁴ RCRC disagrees with the sentiment that their efforts will be counteracted and, therefore, fruitless; these efforts are all the more necessary. Climate change-driven factors and natural disasters were already occurring prior to the devastating fires in 2017, but due to corporate negligence and poor maintenance there were catastrophic results. PG&E, in particular, did not safeguard their equipment and protect life and property in an era of growing public safety risks that were occurring under their nose such as dead and dying trees, and underutilization of undergrounding.¹⁵

RCRC appreciates Liberty CalPeco and SCE’s approach to vegetation management. For example, Liberty CalPeco has a thorough effort underway to understand vegetation characteristics along with local environmental conditions to determine the best way to proceed to, for instance, trim based on growth potential, remove, or leave vegetation alone.¹⁶ Edison is deploying a new “Integrated Vegetation Management” platform to achieve the right trim at the right time through collaboration with arborists, environmental regulators and customers.¹⁷

While PG&E is gaining more experience with specific tree species, it appears they are applying uniform trimming and clearances in their “Enhanced Vegetation Management Program” without regard to vegetative species or characteristics. Enhanced Vegetation Management must be smarter in its design and purpose and incorporate best practices to achieve the right kind of trimming and clearing at the right time. PG&E is

¹³ CAL FIRE: Bark Beetles are killing millions of trees in California, <https://www.readyforwildfire.org/forest-health/bark-beetle-information/>

¹⁴ Page 4-3, PG&E’s 2020-2022 Wildfire Mitigation Plan

¹⁵ *Audit of PG&E Rule 20A Undergrounding Program*, dated October 15, 2019, prepared by AzP Consulting, LLC. Entered into Rulemaking 17-05-010 on December 20, 2019 by ALJ Eric Wildgrube <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M322/K702/322702750.PDF>

¹⁶ Page 76, Liberty CalPECO 2020-2022 Wildfire Mitigation Plan

¹⁷ Page 57, SCE 2020-2022 Wildfire Mitigation Plan

undoubtedly challenged with a heavily forested service territory, many of it in Tier 2 and Tier 3 High Fire Threat Districts, that need aggressive clearing of hazard trees and underbrush. However, PG&E's Enhanced Vegetation Management Program in general should be more sophisticated and less destructive in its application. PG&E should demonstrate an evolution of their Enhanced Vegetation Management Program to be more reflective of best practices of certified foresters and arborists to determine the best treatment and course of action for specific trees and shrubs they are managing.

De-Energization/Public Safety Power Shut-offs (PSPS)

RCRC appreciates the efforts of IOUs to implement strategies to reduce the frequency, impacts, and duration of wildfires and PSPS events. While we understand and appreciate the role that expertly informed, surgical PSPS events play in avoiding catastrophic wildfires, we believe that the 2019 PSPS events were unnecessarily excessive in scope and duration and often poorly executed with inadequate efforts to mitigate impacts to local governments, critical facilities and infrastructure, and medically sensitive populations.

We understand that there will be a continued need for PSPS events to prevent wildfires over the next few years; however, we expect a dramatic reduction in their frequency, size, and duration each year as improvements are made to improve the resiliency and redundancy of the existing transmission and distribution networks.

While the WMPs include some discussion of anticipated use of PSPS events over the immediate, short-term, and 10-year horizon, far more information is needed to better understand how much the utilities will be able to scale back the use of PSPS events over that period. Ten years of "status quo" is unacceptable and clear goals and metrics should be established. We acknowledge that weather patterns, precipitation, and moisture levels will vary from year to year; however, the lack of clear goals in PG&E's WMP is disconcerting because it fails to provide any level of certainty for those communities and critical facilities at greatest risk of de-energization.

Energy Restoration Goals

We appreciate PG&E's objective prior to the upcoming fire season to shorten power restoration following a PSPS weather "all-clear" to 24 hours after weather conditions clear, with a goal to restore 98% of customers within 12 (daylight) hours.¹⁸ This will more closely align with 12-hour service restoration times following a major storm. It is our hope that, in addition to the granularity PG&E intends to use to minimize the downstream effects of PSPS, PG&E will undertake a greater effort to identify, on a granular level, critical facilities and higher concentrations of vulnerable customers that warrant priority re-energization.

¹⁸ Page 4-2, PG&E's 2020-2022 Wildfire Mitigation Plan

We also believe it is imperative to pair expedited system restoration with customer notification that electrical service will be restored. Switching between power sources—such as back-up generation—can impact hospital or other large entity instrumentation, potentially damaging specialty equipment or manufacturing processes. Advanced notification, even if simply a one-hour notice that electricity is likely to be restored soon, will better enable those customers to avoid equipment damage.

Improved Coordination and Information Sharing with Local Governments

We thank PG&E for ranking external communication and coordination with customers and local government partners as their top priority corrective action area immediately going forward.¹⁹ Our county government leaders are willing partners to safeguard their communities and have expertise that can assist their respective utility during these shut-off events. Our overarching desire is that all utilities convene safety-focused advisory boards made up of local officials or county emergency response personnel, including access and functional needs advocates, to ensure appropriate communication and planning for de-energization events, foster long-term cooperative relationships, and create actionable plans to mitigate risk and harm that come from de-energization.

With respect to sharing information with local governments, we appreciate some of the planned activities, but suggest additional changes to avoid some of the missteps experienced during the 2019 PSPS events. We support and appreciate PG&E's commitment to providing local governments with Medical Baseline customer information through the secure data transfer portal to assist in outreach to those constituencies. Local governments have a long history of keeping sensitive information confidential, and so we urge that the utilities not require local governments enter into a nondisclosure agreement or other similar commitment in order to access that important information. Furthermore, in order to facilitate proper planning, it is imperative that this information be shared before an event and not just made available to local governments "during the event," as suggested in the WMP.

Local governments had challenges obtaining timely and accurate information about the scope of PSPS events, impacted customers, critical facilities, and circuits, and system restoration during the 2019 events. In at least one case, a local government only discovered that the outage map they were given had a built-in buffer zone (which included facilities that would not lose power) just prior to having to evacuate a local jail. To avoid those problems in the future, RCRC suggests that:

- Any information or outage specific maps intended for use by public safety partners or dissemination to the public shall accurately depict the outage boundaries and be made available through the electrical corporations' local government web

¹⁹ Page 4-23, PG&E's 2020-2022 Wildfire Mitigation Plan

portal in a readily consumable format that can be quickly integrated into local geographic information system maps.

- Information provided to a local government shall be of the same granularity and updated as frequently as information provided to the state Office of Emergency Services.
- Information provided to the Office of Emergency Service shall be contemporaneously provided to public safety partners and cities and counties impacted by a public safety power shutoff event.

Public Notifications

RCRC supports clear, consistent multi-channel PSPS notifications to ensure that customers are aware of a potential PSPS event. RCRC especially appreciates and supports PG&E's planned efforts to provide notifications and outreach to tenants of master metered accounts who are not the customer of record, but who need the same services as medical baseline customers.

RCRC supports the notification timeframes established in CPUC Decision D. 19-05-042. That decision appreciates that changing weather conditions may not allow for rigid adherence to the 48-72 hour advanced notification for public safety partners and critical facilities and infrastructure and for the 24-48 hour advanced notification for all other customers; however, it requires utilities to make "every effort...to provide notice of potential de-energization as early as the electric investor-owned utilities reasonably believe de-energization is likely. At a minimum, notification to public safety partners must occur when a utility activates its Emergency Operations Center in anticipation of a de-energization event or whenever a utility determines that de-energization is likely to occur, whichever happens first." Utilities should adhere to the established notification timeframe "whenever possible." Unfortunately, the emphasis on providing notification as early as possible and adherence to the timeframes "whenever possible" is missing from PG&E's WMP, which instead repeatedly commits to providing notifications "as weather permits." We strongly suggest that the WMP more closely reflect the language of D. 19-05-042.

RCRC also appreciates and supports PG&E's commitment to provide state, local, and tribal governments with notification in advance of residential customers to enable those entities to better prepare for the event. We stress that those advanced communications also extend to decisions on which community resource centers to open and when power to certain circuits (or the entire system) has been restored. Unfortunately, some of our member counties received these notices contemporaneously with the public or from outside sources.

RCRC appreciates the public alerts SCE is proposing to deploy in 2020 that would notify any mobile phone in a PSPS-impacted area without requiring prior sign-up.²⁰ This is an innovative solution that should be deployed across all utilities — including small and

²⁰ Page 5-118, Southern California Edison's 2020-2022 Wildfire Mitigation Plan

multijurisdictional utilities — and will go a long way to ensure the safety and awareness of non-account holders such as tenants, relatives, tourists, and domestic workers in a PSPS affected area. Millions of visitors enjoy recreational opportunities in rural areas and need a reliable method to receive these alerts during their stay in hotel lodging or short-term housing rentals regarding the conditions of the area in which they are currently situated. Similarly, the Getty Fire in Los Angeles County illustrated the peril domestic workers face when they are unaware of evacuation notices in areas in which they do not reside.²¹ Non-local workers need assurances that they will not be stranded or impacted during a PSPS event and need to receive PSPS notices when they are in an impacted area.

SCE's current allowance of letting non-account holders to sign-up for notifications will put many people at ease by allowing them to proactively track outages at certain locations. Parents, for example, can be assured of their child's well-being at school or daycare facility, as would adult children of older adults that may have limited access to technology for receiving shut-down notices or be located in rural or remote areas of the state. Moreover, this also benefits residents on a master meter that are non-account holders. We appreciate innovative solutions that are responsive to the needs and realities of rural communities and their customers.

Regarding notification surrounding restoration of power after a PSPS, it is no less important to notify all affected customers of when re-energization is expected to occur. Switching between power sources — such as back-up generation — can impact hospital or other large entity instrumentation, potentially damaging specialty equipment or manufacturing. Advance notice and notification can mitigate those consequences and are of equal importance to de-energization notices.

Lastly, when considering how to provide notice of anticipated PSPS events and power restoration, it is important to recognize that a significant portion of the state's population does not have access to the internet, including some of the state's most vulnerable residents that live in underserved and unserved broadband regions. Given the lack of broadband internet in many areas and insufficient cellular coverage in other rural areas, RCRC believes that multi-channel communications are essential and cautions against assumptions that residents will easily be able to "click through" a hyperlink to find out more information about an event or the resources that may be available.

The CPUC is currently engaged in efforts to improve the resiliency of communications networks during PSPS events and other disasters in order to maintain 9-1-1 access and related emergency service and notifications. Similarly, utilities should work collaboratively with communications service providers to ensure that access to 9-1-

²¹ LA Times Article, *Getty fire: Housekeepers and gardeners go to work despite the flames*
<https://www.latimes.com/california/story/2019-10-28/getty-fire-housekeepers-arrive-to-work>

1 and emergency services are not compromised during a PSPS event. This need is even more acute given the increased reliance by many customers on backup generators during a PSPS event and the resulting increase in risk of fire from the improper use or malfunctioning of that equipment.

Mitigation of PSPS Impacts on Access and Functional Needs Populations

RCRC is especially concerned about how PSPS events impact medically sensitive residents, including medical baseline customers and the larger access and functional needs (AFN) community. We recognize that medical baseline customers have specific medical needs that require electricity; however, we believe that group fails to include residents who are not the customer-of-record because they reside behind a master meter at a multifamily complex. Furthermore, the medical baseline universe is far smaller than the AFN community. As such, we appreciate that the IOUS are going beyond simply providing assistance to medical baseline customers, as required by Senate Bill 167 (Dodd, 2019), and also include AFN residents in their outreach and mitigation efforts.

RCRC supports PG&E's efforts to expand enrollment in the medical baseline program and suppression of automatic unenrollment from the program between May and November of each year. We also appreciate PG&E will "provide additional support" for customers subject to unenrollment when those processes resume during the months of December to April.²² We are also strongly supportive of PG&E's planned efforts to provide outreach to customers who are tenants of master metered accounts and so who are not the customer-of-record, but who may otherwise have the same needs as medical baseline enrollees.

RCRC strongly believes that PG&E needs to mitigate PSPS impacts for medical baseline customers and for others in the AFN community who have sensitive medical needs. We support the dedication of significant SGIP resources to provide energy storage to medically sensitive residents; however, we are well aware that funding for that program is limited and will not be sufficient to fully protect all residents.

We appreciated PG&E's partnerships with Community Based Organizations (CBOs) that serve AFN and medical baseline customers during the latter 2019 PPS events to provide mobile battery devices to residents with sensitive medical needs. We support using and expanding that framework; however, the WMP lacks the details that are necessary to ensure that it will be sufficiently protective of those with sensitive medical needs throughout the state. The WMP must include much more information on the number of partnerships with CBOs, the locations served by those CBOs, the number of residents reasonably expected to be supported by those CBOs with the assistance provided, and a comparison of how much of the AFN universe that network is anticipated to serve. It is imperative that we ensure that AFN residents in certain areas do not fall

²² Page 5-301, PG&E 2020-2022 Wildfire Mitigation Plan

through the cracks because PG&E does not have sufficient partnerships with CBOs in impacted areas or is not providing the level of assistance needed.

In addition to direct mitigation efforts, RCRC strongly encourages PG&E to provide, rather than simply explore, programs to provide free transportation and accommodation to medically sensitive individuals whose needs cannot be addressed through other types of assistance. To meet those transportation needs, RCRC suggests entering into memorandum of understandings (MOUs) with medical transportation providers. PG&E cannot rely upon first responders to provide medical transportation except in emergencies, since existing resources are already limited and are often inundated with service calls during PSPS events.

Finally, we support PG&E's efforts to expand the medical devices and conditions covered by the medical baseline program and to adjust the enrollment process to grant immediate and temporary enrollment for customers to receive PSPS-related notifications and support; however, we must reiterate that enrollment in the medical baseline program cannot be a prerequisite for qualifying for those PSPS notifications and services.

As with PG&E, RCRC supports SCE's efforts to notify and assist the AFN community beyond just those enrolled in the medical baseline program. Furthermore, we support SCE's efforts to work with CBOs and Independent Living Centers to help mitigate PSPS impacts to AFN residents. As with PG&E, SCE's WMP must include much more information on the number of partnerships with CBOs, the locations served by those CBOs, the number of residents reasonable expected to be supported by those CBOs with the assistance provided, and a comparison of how much of the AFN universe that network is anticipated to serve. It is imperative that we ensure that AFN residents in certain areas do not fall through the cracks.

RCRC appreciates and supports SCE's efforts to fully subsidize the deployment of battery back-up solutions for Critical Care residential customers that are income eligible.²³ SCE and the other utilities should increase efforts to expand enrollment in medical baseline programs and identify and mitigate impacts for other individuals who have similar medical needs. While the provision of battery-back up systems is one tool for mitigating those impacts, SCE should additionally provide transportation and accommodation for other medically sensitive individuals in situations where their needs may not be met by those devices, where those devices are unavailable, or when their needs cannot otherwise be met by a CRC.

Utilization of Community Resource Centers (CRC)

RCRC strongly believes that properly sited and equipped CRCs can help mitigate the impacts of PSPS events on local populations, especially those medically sensitive residents whose needs for electricity have otherwise gone unmet. Generally, RCRC

²³ Page 72, SCE 2020-2022 Wildfire Mitigation Plan

believes that IOUs should work with local governments to jointly identify sites where CRCs can quickly be opened upon de-energization. Those sites must provide the services identified by the applicable local government, be open and accessible around the clock until service is fully restored in the area, and be located a reasonable distance from the population impacted. Meeting these requirements will help avoid the overdependence and overutilization of first responders and emergency rooms that occurred during the 2019 events when residents were unable to access the services they needed at the few CRCs that were open (and which were largely open only during daylight hours). RCRC strongly suggests partnering with local government and private entities to establish CRCs at fixed facilities where possible, including at libraries, community centers, senior centers, sports centers, and fairgrounds.

We acknowledge that SCE's and PG&E's plans to utilize CRCs for this year's PSPS events are a significant step forward from last year's efforts; however, much room for improvement remains.

RCRC believes that the Community Outreach Vehicles (COVs) deployed by SCE during the 2019 events were inadequate both in terms of the services available and the number of units deployed and we are happy to note that their WMP looks toward partnering with *facilities* around their service territory, including utilization of Sears and Kmart stores in urban areas. RCRC supports SCE's efforts to have pre-established CRC agreements in place with property owners so that those facilities can be quickly opened upon initiation of a PSPS event. SCE plans to have 23 sites available across its service territory in 2020 and 50 in 2021 (including 15 urban and 35 remote CRCs). Whether those numbers will be adequate to meet customer needs depends largely on the size of PSPS events and distances between those CRCs and the communities whose power has been shut off. We appreciate that SCE is open to using "pop-up" CRCs to meet local needs, including indoor and outdoor facilities. While we understand that indoor facilities may not always be available for use, we strongly encourage their use where feasible because they can generally provide much more extensive services than outdoor facilities. At a minimum, we stress that CRCs be located a reasonable distance from impacted communities, provide the services identified by the appropriate local government (including capacity to recharge medical devices used by access and functional needs individuals), and be open 24 hours a day.

RCRC appreciates PG&E's efforts to increase the number of CRCs available to customers, increase coordination with local governments in siting those centers, and shifting those centers to fixed facilities. PG&E notes that they deployed 77 CRCs in 30 counties during the October 23-29 PSPS events; however, that equates to roughly one center per 13,000 customers (which can probably safely be doubled to reach the approximate number of residents impacted). With that in mind, we are pleased to see that PG&E already has executed agreements with landowners to site roughly 100 CRC locations across 30 counties for the 2020 fire season. We understand that those sites include a mix of indoor and outdoor facilities, but are encouraged by their target of having

200 indoor CRC locations identified prior to the 2020 fire season. RCRC also supports PG&E's efforts to work with local governments and organizations to co-develop CRCs that provide residents with basic resources, including electricity "to meet their most basic power needs," refreshments, and information about the PSPS event and service restoration.

RCRC recognizes that PG&E's WMP states that CRCs will primarily be open during daylight hours; however, the need for power does not end when the sun goes down. Many residents (including those behind master meters) rely on medical equipment that must either be plugged in to operate or must be recharged at regular intervals. When CRCs were either unequipped to charge those devices or were closed at night during the 2019 fire season, those residents were forced to call local first responders or go to emergency rooms to try to recharge their devices. This is unacceptable because those needs should be anticipated and served by CRCs if they cannot be mitigated on an individual basis.

RCRC strongly supports PG&E's proposed efforts to provide free transportation for access and functional needs individuals to and from CRCs by collaborating with CBOs and local stakeholders; however, we believe it is inappropriate to utilize first responders for these purposes as PG&E suggests in its WMP.²⁴ First responders must be able to quickly respond to emergencies and most rural areas do not have adequate resources available to transport residents to and from CRCs. Local governments already struggle with personnel overtime costs and physical/mental exhaustion in dealing with PSPS events. In those isolated cases where first responders are utilized as a last resort, they must be fully reimbursed for their services.

Metrics for Working with Critical Facilities to Perform Needs Assessments

We appreciate efforts of the utilities to quickly restore power and deploy backup generation to critical facilities during last year's PSPS events in order to protect public health, safety, and the environment when generators at those facilities unexpectedly failed or where the operator lacked back-up power. We support the continuation of those efforts, but caution against charging those facilities for that service, especially as many of the critical facilities that currently lack back-up generation have smaller customer bases and/or serve lower-income communities that simply may be unable to afford the equipment.

CPUC Decision D. 19-05-042 requires utilities to "proactively partner with critical facility and critical infrastructure representatives to assess the ability of each critical facility to maintain operations during de-energization events of varying lengths. The electric investor-owned utilities must help critical facility and critical infrastructure representatives assess the need for backup generation and determine whether additional equipment is needed, including providing generators to facilities or infrastructure that are not well

²⁴ Page 5-290, PG&E 2020-2022 Wildfire Mitigation Plan

prepared for a power shut off.” We suggest that the utilities report on the status of these efforts, including the number of critical facility operators that were assisted.

Identification of Critical Facilities

RCRC understands that the list of critical facilities included in CPUC Decision D. 19-05-042 was not intended to be an exhaustive list. To that end, we appreciate SCE’s efforts to include many types of facilities that were not included in the CPUC list, but which were requested to be included by counties within their service territory. We suggest that the utilities additionally include on those lists local food banks, flood control facilities, and local elections officials. Any loss of power to a food bank will hobble community response and mitigation efforts. It may be very difficult to replace the perishable food lost as a result of spoilage from the loss of power – these consequences would be especially catastrophic around the Thanksgiving holiday season. With respect to flood control facilities, these types of flood control systems are vital to prevent the economic losses and public safety consequences associated with flooding. The sudden loss of power to drainage pumps arising from a PSPS event could cause considerable damage to those lands and populations protected by levees otherwise below the surrounding water level. Finally, elections officials operate under tight timeframes and can ill-afford the added challenges and delays related to the loss of electricity at polling places, voting centers, and central offices. While the risk that a PSPS event will coincide with the election window may be low, the consequences for failure to plan are serious.

Situational Awareness

All large utilities have made great strides to deploy better situational awareness tools, including weather monitoring devices, with real-time localized conditions that will assist with preventing outages and sparks caused by downed wires or contact with wires. We appreciate that these tools are publicly available to support first responders’ efforts with real-time risk analysis and proactively averting the spread of wildfire. This kind of coordination and collaboration with public agency partners through information sharing will help safeguard communities, especially if it reduces the scope, duration and frequency of PSPS on customers, and reduce the spread of wildfire ignitions.

Emergency Preparedness, Outreach and Response

RCRC is very encouraged by the emergency preparedness outreach PG&E has identified, such as localized one-on-one meetings with jurisdictions, working with counties to identify critical facilities for prioritized restoration after a PSPS event, working with counties to identify CRC locations, shared progress of vegetation management and system hardening, as well as providing access to data portals.²⁵ We further appreciate PG&E providing single points of contact for impacted counties during PSPS for real-time information that is specific to the event and its location, as well as embedding that personnel within local Emergency Operations Centers (EOCs) and allowing local

²⁵ Page 5-235 and 5-236, PG&E 2020-2022 Wildfire Mitigation Plan

representatives in PG&E's EOC.²⁶ These are marked improvements over 2019 and we look forward to evaluating PG&E's follow-through and effectiveness of these strategies in 2021.

Metrics, Monitoring, and Reporting

While we can appreciate the complexity of evaluating risk-spend efficiency, we request a tool to compare the cost/benefits across utilities, or at the very least, get a better understanding of how a utility used qualitative and quantitative values in their own risk-spend efficiency. The goal of such a tool would be to get a better understanding of how a utility measurably reduces wildfire risks without creating redundancies for ratepayers, as well as compare best practices on cost-effectiveness across all utilities, large and small.

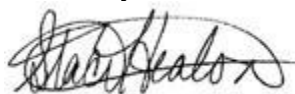
Additionally, we believe that the WMP should be modified to provide additional details on how the utilities will mitigate PSPS impacts on medically sensitive populations to better gauge whether those efforts will be sufficient. As previously mentioned, the WMP must include much more information on the number of partnerships with CBOs, the locations served by those CBOs, the number of residents reasonably expected to be supported by those CBOs with the assistance provided, and a comparison of how much of the AFN universe that network is anticipated to serve.

Conclusion

As the Wildfire Safety Division (WSD) develops a transition plan to the California Natural Resources Agency per AB 1054, we encourage a more formalized, transparent role of CAL FIRE expertise and consultation in these WMPs. For example, we recommend that approval of WMPs, in whole or in part, be contingent upon third-party validation by experts such as CAL FIRE. Also, while we understand the WSD is still in its infancy, we encourage the WSD to be less obscure in its operation and clearly articulate the public process both for parties in the CPUC's Rulemaking Proceeding and for other interested stakeholders going forward.

Thank you for your consideration of our comments.

Sincerely,



STACI HEATON
Senior Regulatory Affairs Advocate

²⁶ Ibid.

Ms. Caroline Thomas Jacobs
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cc: Service List, R.18-10-007
Members of the Senate Energy, Utilities & Communications Committee
Members of the Assembly Utilities & Energy Committee
Gregory Melkonian, Consultant, Assembly Republican Caucus
Kerry Yoshida, Consultant, Senate Republican Caucus
Members of the Wildfire Safety Advisory Board