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Comments of Small Business Utility Advocates on Wildfire Safety Advisory Board’s Draft Recommendations on the 2022 Utility Wildfire Mitigation Plan Guidelines, Performance Metrics, and Safety Culture Assessment

Dear Wildfire Safety Advisory Board:

Small Business Utility Advocates (SBUA) welcomes and supports the Wildfire Safety Advisory Board’s recommendations and participation in improving the electric utilities’ Wildfire Mitigation Plans (WMPs). SBUA is a nonprofit corporation with the mission of representing the utility-related concerns of the small business community. Small businesses are vital to California’s economic health and welfare and constitute an important, but sometimes underserved, class of customers for utility companies.

SBUA actively participates in Public Utility Commission proceeding R.18-10-007, as well PSPS proceedings R.18-12-005 and I.19-11-013, to advocate for small businesses interests, which are severely burdened by public safety power shutoff (PSPS) events and the ongoing risk of electric-equipment-sparked catastrophic wildfires. Small businesses suffer significant and uncompensated financial losses from PSPS that are occurring throughout larger portions of the year as “fire season” continues to expand to include winter and spring months. SBUA is greatly troubled that utilities do not yet have a handle on utility-ignition risk and are struggling to live up to their obligation to provide both safe and reliable service, and, for the foreseeable future, appear to continue to force customers to choose between the two.

SBUA has the following comments on the Board’s recommendations.

A. PSPS Considerations Must be Better Integrated into WMPs

Presently, WMPs are a key component of managing and reducing the harm of PSPS events and the Public Utilities Commission has proposed shifting more PSPS mitigation and reporting to

WMPs¹ SBUA notes that the Board’s regular specific reference to its recommendations apply to PSPS sets the right tone and is appreciated.

B. Electric Utilities Must Treat PSPS as a Risk, not just a Risk Reduction Tool

SBUA strongly supports the Board’s recommendation that “2022 WMP Guidelines require PSPS to be treated as a risk for the purposes of the RSE calculations to encourage the utilities to allocate resources in a way that prioritizes reducing the number, scope, duration, and reenergization timeline of PSPS events.”² SBUA has been alarmed by statements by PG&E executives in 2020 that PSPS was viewed as a risk mitigant without recognizing risks shifted to the public, and that PSPS is or was not included on PG&E’s risk register.³ Requiring that utilities prioritize PSPS reduction will further compliance with existing Commission rules mandating that PSPS only be employed as a tool of last resort and when the wildfire risk outweighs public safety risks posed by PSPS.

C. Fire Risk Tolerance of Zero for Triggering PSPS Violates Commission Rules

In June 2021, IOUs were found to have violated Commission rules by failing to determine that the risk of wildfires outweighed public safety risks of de-energization.⁴ IOUs are prohibited from engaging PSPS merely because there is some risk of wildfire.⁵ The Board correctly recommends that utilities must assess PSPS reduction opportunities at various risk fire thresholds and “explain how they quantify risk tolerance for their models[.]”⁶

¹ Proposed Decision Adopting Phase 3 Guidelines, R.18-12-005, pp. 120, 145 (May 21, 2021).

² Draft Recommendations, p. 13.

³ See, e.g., Transcripts of Oral Testimony in I.19-09-016: PG&E- Vesey 367-68; Presiding Officer’s Decision on Alleged Violations of Pacific Gas and Electric Company with Respect to its Implementation of the Fall 2019 Public Safety Power Shutoff Events, R.18-12-005, pp. 56, 71, 78 (May 26, 2021).

⁴ D.2106014, Conclusions of Law 10-12.

⁵ Commission Resolution ESRB-8, p.5 (July 12, 2018); D.19-05-042, Appendix A, p. A24 (requiring weighing of relative risks).

⁶ Draft Recommendations, p. 13.

Unfortunately, the Board’s recommendations ignore that in several proceedings, the utilities have admitted that they do not collect any data on the incidence or degree of public safety risks from PSPS events. The utilities have declined to gather the data that is necessary to assess the “reduction in consequences of . . . PSPS” proposed in the recommendations.⁷ Obvious risks include traffic accidents due to inoperable street lights or intersection control signals, fires ignited by candles or generators,⁸ heat stroke, hypothermia and carbon monoxide poisoning, harm from spoiled food or medication, interruption of medical equipment, trip and falls in unlighted areas and stress-induced medical emergencies. SBUA has previously recommended that

For each circuit, the IOU must identify the total number of people served, medically vulnerable customers, small businesses customers, customers lacking notification information, stop lights, high-risk intersections, telecommunications facilities, industrial or commercial operations involving hazardous materials or with safety systems dependent on electricity, hospitals and other medical facilities, water treatment and pumping facilities, essential government buildings (police substations, prisons, fire command centers, etc.), schools and other risk factors. These catalogs can form initial datasets to assist IOUs in assessing risks associated with de-energization.⁹

The Board should recommend that utilities implement data collection mechanisms to facilitate reporting of adverse events caused by PSPS de-energization and undertake or commission a detailed study of the public safety consequences and economic costs that have resulted and may flow from PSPS de-energization.

D. Further Detail Should be Added to the Board’s Risk Assessment Recommendations

⁷ Draft Recommendations, p. 14.

⁸ A. Martichoux, et al, “2 Oakland hills homes burned after overloaded generator sparks explosion, fire,” *ABC 7 News* (October 27, 2020) <https://abc7news.com/montclair-explosion-oakland-hills-fire-merriewood-in/7392589/> (“overloaded generator running outside a home due to the PG&E PSPS appears to be the cause of a fire”).

⁹ SBUA, Opening Comments on Proposed Decision Address the Late 2019 PSPS, I.19-11-013, pp. 8-9 (May 10, 2021); see also, SBUA, Opening Brief Regarding Remedies Under the Order to Show Cause, R.18-12-005, p. 5 (Oct. 30, 2020).

SBUA supports the Board's recommendations on understanding and assessing the modeling methods, assumptions, inputs, outputs, and decision-making. SBUA has frequently commented in R.18-12-005 filings on the opaque and untested assumptions behind IOUs' PSPS initiation protocol.

SBUA recommends that the Board add a part (v) to section 3(a) to the Risk Assessment recommendation on page 7 to clarify that validation of modeling assumptions includes “Iterative evaluations of the actual outcomes against modeled projections.” In the context of PSPS events, SBUA is concerned that IOU post-event reports and analysis fail to explain, consider and learn from the degree to which projected risks or concerns actually materialized. Each of the numerous PSPS events that were initiated provided opportunities to fine tune modelling by comparing actual weather conditions, equipment damage and vegetation impacts to expectations based on any modeling employed.

Additionally, section 7(a) should be expanded to include a description of “equipment and ignition modeling” because much of PSPS decision-making should turn on expected failure rates of equipment, which may not have been validated.

E. Transparency and Peer Review of Proprietary Modeling is Needed

“The public safety of Californians depends upon our ability to reduce or eliminate utility-caused ignitions and wildfires and risk modeling is a key piece of the puzzle.”¹⁰ SBUA strongly supports the Board's emphasis on the need for transparency by utilities and supports the creation of a review board to consider the effectiveness proprietary systems without compromising trade secrets.

SBUA strongly supports the Board’s recommendations and looks forward communication with the Board.

¹⁰ Draft Recommendations, p. 10.

Respectfully submitted June 23, 2021,



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