BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Wildfire Safety Division California Public Utilities Commission	Review of 2021 Wildfire Mitigation Plans
Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018).	Rulemaking 18-10-007 (Filed October 25, 2018)

OPENING COMMENTS OF SMALL BUSINESS UTILITY ADVOCATES ON THE INVESTOR-OWNED UTILITIES' 2021 WILDFIRE MITIGATION PLAN UPDATES

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SUMMARY OF RECOMMENDATIONS

As discussed in detail below, Small Business Utility Advocates respectfully recommends that the Division require the utilities to make the following improvements to their 2021 Wildfire Mitigation Plans:

SDG&E 2021 WMP

Summary of Ratepayer Impact (3.2)

- For transparency purposes, SDG&E should be required to report on bill impacts for all ratepayer classes, including small commercial customers.

Microgrids (7.3.3.8.2)

- SDG&E should report on the number of non-residential customers that will be served by each microgrid, like SCE.

Mitigation of impact on customers and other residents affected during PSPS events (7.3.3.11)

- For the Standby Power Program, SDG&E should be required to streamline the permitting process for commercial customers, in collaboration with local jurisdictions, and to address the extended permitting and installation processes involved.

- For the Generator Assistance Program (GAP), SDG&E should be required to (1) provide incentives to residential and small business customers who experienced a power outage in HFTD zones, (2) continue targeting low income customers with enhanced rebates, and (3) in addition to CARE customers, SDG&E should offer enhanced rebates to customers for "hard-to-reach" customers, both residential and small commercial.

Community outreach, public awareness, and communication efforts (7.3.9.2)

- For outreach and communications, SDG&E should (1) prioritize customers that meet the definition of "hard-to-reach" because the Commission has concluded these customers are less responsive to outreach efforts due to barriers and (2) evaluate on a rolling basis the efficacy of its outreach, awareness, and communication efforts to identify if any subsets of customers are not having their needs met by current strategies.

Customer support in emergencies (7.3.9.3)

- SDG&E should modify its policy for non-residential customers so that bill adjustments for small commercial customers mirrors the policy for residential customers.

Preparedness and planning for service restoration (7.3.9.5)

- SDG&E should provide information on safety inspections done prior to restoring service and how circuits are prioritized for power restoration, like SCE's WMP does.

Community engagement – community outreach and public awareness (7.3.10.1) and PSPS communication practices (7.3.10.1.1)

- SDG&E should be directed to explore establishing relationships with organizations focused on serving small businesses to ensure the communication needs of these underserved customers are met.

Directional vision for necessity of PSPS (8.1)

- SDG&E should propose how generators using renewable resources will provide reliable service during wildfires and power outages.

Protocols on Public Safety Power Shutoff (8.2)

- SDG&E should also utilize mobile resource centers to reach impacted customers as not all customers may have the capacity to travel to resource centers, similarly to how SCE has outfitted eight cargo vans and box trucks to serve as mobile resource centers.

- The Division should require all the IOUs to explore the need for 24/7 centers and how they can safely operate them.

SCE 2021 WMP:

Summary of Ratepayer Impact (3.2)

- SCE should be required to provide more granular data and report on rate increases for small commercial customers in addition to reporting on increases to non-CARE residential customers.

Microgrids (7.3.3.8.2)

- For transparency purposes, the Division should require SCE to disclose the names of communities selected for microgrid pilots.

Customer support in emergencies (7.3.9.3)

- SCE should specify what type of payment plans are provided such as zero interest, the length of this, etc., like SDG&E.

- SCE should clarify its billing adjustments policy and how far back this will extend to.

Protocols on Public Safety Power Shutoff (8.2)

- As above, the Division should require all the IOUs to explore the need for 24/7 centers and how they can safely operate them.

PG&E 2021 WMP:

Summary of Ratepayer Impact (3.2)

- For transparency purposes, PG&E should be required to provide estimated bill impacts for small commercial customers.

Microgrids (7.3.3.8.2)

- PG&E should compare the costs-benefits of its sectionalization strategy with those of microgrids.

Mitigation of impact on customers and other residents affected during PSPS events (7.3.3.11)

- PG&E should discuss how diesel alternatives will provide reliable energy.

Customer support in emergencies (7.3.9.3)

- The WMP is silent about interest rates but the Division should require PG&E to charge zero percent interest for customers in these repayment plans, like SDG&E does.

- As with residential ratepayers, PG&E should provide financial support services to small commercial ratepayers because many of these customers have limited expendable income.

Protocols on Public Safety Power Shutoff (8.2)

- As above, the Division should require all the IOUs to explore the need for 24/7 centers and how they can safely operate them.

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OPENING COMMENTS OF SMALL BUSINESS UTILITY ADVOCATES ON THE INVESTOR-OWNED UTILITIES' 2021 WILDFIRE MITIGATION PLAN UPDATES

I. INTRODUCTION

Pursuant to the Wildfire Safety Division's (Division) March 1, 2021 email ruling granting the request to extend the time for filing comments, Small Business Utility Advocates (SBUA) submits the following opening comments on the investor-owned utilities' (IOUs) 2021 Wildfire Mitigation Plan updates (WMPs).

II. COMMENTS ON THE IOUS' WMPS

A. Comments on SDG&E's WMP

i. Summary of Ratepayer Impact (3.2)

The Division instructed the utilities to report on the "projected cost increase to *ratepayers*."[1] SDG&E provided bill impacts using "an estimate for a residential customer on

[1] WMP Guidelines Template, Table 3-3, p. 23 (emphasis added).

basic service with a consumption of 500 kWh/month."[2] For transparency purposes, SDG&E should report on bill impacts for all ratepayer classes, including small commercial customers. This information will allow stakeholders to understand the rate increases for each customer class and whether these increases are reasonable. At a minimum, the Division should require the utilities to report on bill impacts for single-family residential, multi-family residential, small commercial, large commercial, and industrial customers.

ii. Microgrids (7.3.3.8.2)

SBUA supports SDG&E's proposal to utilize microgrids as a cost-effective means to reduce the need for PSPS events.[3] Microgrids can also reduce the risk of wildfires as the decision to deenergize power lines becomes more palpable if critical facilities and Access and Functional Need (AFN) customers will not lose power, and deenergized power lines lower the risk of sparking or spreading fires. SBUA also supports SDG&E's proposal to target low-income communities for the deployment of additional microgrids.[4] The Division should require all utilities deploying microgrids to prioritize low-income communities, including for residential and diverse small business customers, as ratepayers in these communities have less resources to prepare for power shutoffs, such as not having sufficient funds to purchase backup generators for their homes and businesses.

Like SCE, SDG&E should report on the number of non-residential customers that will be served by each microgrid.[5] SDG&E's WMP did not provide this data which is necessary to

[2] SDG&E WMP, p. 9.

[3] *Id*., p. 200.

[4] *Id.*, p. 201.

[5] *See* SCE WMP, p. 218.

determine the effectiveness of its microgrids in providing energy to customers with less resources.

iii. Mitigation of impact on customers and other residents affected during PSPS events (7.3.3.11)

SDG&E indicates that the Standby Power Program has benefitted from SDG&E's collaborative efforts with the County of San Diego to streamline residential permitting.[6] For commercial customers, SDG&E proposes to start the permitting process earlier due to the lengthier process that exists.[7] In addition to starting the process earlier, SDG&E should explore collaborative efforts with local jurisdictions to streamline the permitting process for commercial customers to address the "extended permitting and installation processes involved."[8]

For the Generator Assistance Program (GAP), SDG&E provided incentives to residential and small business customers who experienced a power outage in a High Fire Threat District (HFTD) zone and proposes to continue targeting low-income customers with enhanced rebates.[9] SBUA supports these incentives. In addition to CARE customers, SDG&E should offer enhanced rebates to customers who meet the definition of "hard-to-reach" as indicated in D.18-05-041.[10] Without financial assistance, customers who lease their residences and/or business locales are unlikely to prioritize investing in generators and therefore should also qualify for increased incentives. SBUA supports SDG&E's plan to improve the GAP initiative by adding

[6] SDG&E WMP, p. 212.

[7] *Id*.

[8] *Id*.

[9] *Id*., at p. 213.

[10] D.18-05-041 (Decision Address Energy Efficiency Business Plans), issued June 5, 201, pp. 42-43 (discussing importance of hard-to-reach customers), pp. 159-160 and Findings of Fact #14 (providing definition of hard-to-reach customers based on Resolution G-3497 and other factors).

local retailers to the list of qualifying retailers where customers can utilize rebates because not all customers have easy access to "big box stores," particularly those living in rural areas.

iv. Community outreach, public awareness, and communication efforts (7.3.9.2)

The WMP indicates that customers throughout the entire service territory are targeted by education and communication efforts due the regional threat of wildfires.[11] While all customers should receive educational materials to make them aware of wildfire safety tips pre and during a wildfire and how to obtain more information, SDG&E should prioritize customers that meet the definition of "hard-to-reach" in D.18-05-041, because the Commission has concluded these customers are less responsive to outreach efforts due to barriers. Without tailored messaging, these customers may not receive the information they need to prepare for a wildfire or power shutoffs. In addition, SDG&E should evaluate on a rolling basis the efficacy of its outreach, awareness, and communication efforts to identify if any subsets of customers are not having their needs met by current strategies. For example, traditional methods like radio, mailings, and automated calls may not be as effective as social media but less tech-savvy customers may not have access to social media and may need other outreach strategies.

v. Customer support in emergencies (7.3.9.3)

SDG&E's proposal for billing adjustments for non-residential customers needs minor modification. In the event a non-residential customer's structure is destroyed by a wildfire, SDG&E intends to close "bill amounts from the previous regular read date up to the dates on which the wildfire occurred", but these customers will still be held responsible for prior months' bills.[12] In comparison, residential customers will have charges waived that include the month

[11] SDG&E WMP, p. 316.

[12] *Id.*, p. 323.

prior to the wildfire.[13] SDG&E should modify its policy for non-residential customers so that bill adjustments for small commercial customers mirrors the policy for residential customers. Distinguishing between small and large commercial customers is reasonable given the difference in financial resources among them.

vi. Preparedness and planning for service restoration (7.3.9.5)

In this section of its WMP, SDG&E focuses on describing how the mutual assistance program works, its goal of restoring service safely, and the other benefits of the program.[14] To the extent SDG&E prepares and plans for service restoration outside of reliance on the mutual assistance program and network, the WMP needs to provide this information. For example, SDG&E should provide information on safety inspections done prior to restoring service and how circuits are prioritized for power restoration, like SCE's WMP does.[15] If the mutual assistance program is the only means currently utilized for service restoration, then SDG&E should plan for alternatives in case other entities are unable to assist due to having to address disasters impacting their own customers.

vii. Community engagement – community outreach and public awareness (7.3.10.1) and PSPS communication practices (7.3.10.1.1)

SBUA supports SDG&E's Energy Solutions Partner network as it leverages community-based organizations' expertise and established relationships to conduct effective outreach to specific customer segments.[16] SDG&E should explore establishing relationships with

[13] *Id*.

[14] SDG&E WMP, pp. 326-27.

[15] SCE WMP, p. 316.

[16] SDG&E WMP, p. 336.

organizations focused on serving small businesses to ensure the communication needs of these underserved customers are met.

Given the role that cell phones play in everyday life, Alerts by SDG&E seems like a cost-effective method to reaching customers that should be expanded. To the extent not already available, this app should improve by providing notifications and other information in languages other than English, similarly to how SDG&E provides email, text, and voice notifications in either other languages.[17]

viii. Directional vision for necessity of PSPS (8.1)

SDG&E indicates that its four microgrid sites currently operational will eventually have renewable resources as the pandemic delayed this rollout and conventional generators were deployed.[18] While SBUA supports efforts to reduce greenhouse gas emissions and curb climate change, reliability needs to remain a priority during power outages. Therefore, SDG&E should propose how generators using renewable resources will provide reliable service during wildfires and power outages.

ix. Protocols on Public Safety Power Shutoff (8.2)

SBUA supports SDG&E's use and planned expansion of Community Resources Centers. One area for improvement is to train staff to provide ratepayers with information on programs providing or assisting with temporary housing assistance, particularly given that these centers operate from 8am-10pm.[19] SDG&E should also utilize mobile resource centers to reach impacted

[17] *See* SDG&E WMP, p. 341.

[18] SDG&E WMP, p. 351.

[19] *Id.*, p. 355.

customers as not all customers may have the capacity to travel to resource centers, similarly to how SCE has outfitted eight cargo vans and box trucks to serve as mobile resource centers.[20]

B. Comments on SCE's WMP

i. Summary of Ratepayer Impact (3.2)

SCE's WMP reported two data points for rate increases: increases to system average rates and increases to non-CARE residential customers.[21] As mentioned for SDG&E, the Division should require SCE to provide more granular data and report on rate increases for small commercial customers in addition to reporting on increases to non-CARE residential customers.

ii. Microgrids (7.3.3.8.2)

SCE is in the process of establishing its first microgrid pilot.[22] The WMP indicates that SCE selected the circuit based on the frequency of PSPS events and by conducting a cost-benefit analysis.[23] For transparency purposes, the Division should require utilities to disclose the names of communities selected. SCE also reports that it has struggled to receive qualified requests for proposals for the development of microgrid sites.[24] Given that SDG&E and PG&E have successfully deployed microgrid pilots, SCE should confer with them to learn about lessons learned in RFP solicitation and selection.

iii. Customer support in emergencies (7.3.9.3)

Additional information is needed to accurately evaluate SCE's customer support services. SCE's WMP provides a bullet point list with a short description of its activities that support

[20] *See* SCE WMP, p. 347.

[21] SCE WMP, pp. 31-32.

[22] *Id.*, p. 218.

[23] *Id.*, p. 218.

[24] *Id.*, p. 219.

customers but does not provide the level of detail needed. For example, SCE indicates that it works "with impacted customers to provide extended payment plans through recovery from incident."[25] Like SDG&E, SCE should specify what type of payment plans are provided such as zero interest, the length of this, etc.[26] SCE should also clarify its billing adjustments policy and how far back this will extend to, i.e. if it will include the month prior to the wildfire. Moreover, to the extent SCE intends to provide additional support to ratepayers whose residence/business burned down, the WMP should specify it.

iv. Community engagement – community outreach and public awareness (7.3.10.1) and PSPS communication practices (7.3.10.1.1)

SBUA supports SCE's efforts to keep cities, counties, and tribes up to date on WMP and PSPS efforts and to receive feedback from these local agencies.[27] The Division should require other utilities to also collaborate with local agencies.

C. Comments on PG&E's WMP

i. Summary of Ratepayer Impact (3.2)

The Division should require the other IOUs to provide the same level of detail as PG&E's WMP provides on this topic. While SCE and SDG&E provided tables illustrating the rate impacts on customers and a few sentences summarizing their estimated rate impacts, PG&E provided detailed information on how it calculated estimated ratepayer impacts.[28] PG&E also provided estimated bill impacts that 2016-2020 wildfires will have on rates from 2021-2025.[29] The Division should require all utilities to include similar estimates in their WMPs.

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[25] *Id.*, p. 312.

[26] *See* SDG&E WMP, p. 323.

[27] *See* SCE WMP, p. 364.

[28] PG&E WMP, pp. 40-44.

[29] *Id.*, p. 44.

Like the other IOUs, PG&E's WMP includes estimated bill impacts only for non-CARE residential customers.[30] For transparency purposes and the reasons stated above, the Division should require PG&E to provide estimated bill impacts for small commercial customers.

ii. Microgrids (7.3.3.8.2)

SBUA supports PG&E's use of transmission line sectionalizing as part of its strategy to reduce de-energization frequency. The Division should require PG&E to compare the costs-benefits of sectionalization with those of microgrids. In addition, PG&E needs to provide quantitative information on how the deployment of this technology will reduce the need for PSPS events and the estimated benefit of each project. This information is not provided in the WMP, preventing public review of these projects.

iii. Mitigation of impact on customers and other residents affected during PSPS events (7.3.3.11)

As indicated above, though SBUA supports the use of renewable energy-powered microgrids, reliability needs to remain a priority during power outages. In its proposal for a long-term framework for substation generation, PG&E should discuss how diesel alternatives will provide reliable energy.

iv. Community outreach, public awareness, and communication efforts (7.3.9.2) and Community engagement – community outreach and public awareness (7.3.10.1) and PSPS communication practices (7.3.10.1.1)

The Division should require the other utilities to follow PG&E's lead and add business associations to their list of groups to outreach to as part of community engagement efforts, so that utilities can better understand the needs of commercial customers.[31]

[30] *Id.*, p. 40.

[31] *See* PG&E WMP, pp. 762 & 809.

v. Customer support in emergencies (7.3.9.3)

PG&E's WMP indicates that impacted and red-tagged customers qualify for a PG&E's "most lenient payment arrangement term, which requires a 20 percent down payment and a repayment period of 12 months."[32] The WMP is silent about interest rates but the Division should require PG&E to charge zero percent interest for customers in these repayment plans, like SDG&E does.[33]

While SBUA supports PG&E's policy to provide financial support to impacted residential ratepayers, this support should include other customers with limited resources. As indicated above, the Division should require all utilities to expand their financial support services to include small commercial ratepayers because many of these customers have limited expendable income.

vi. Preparedness and planning for service restoration (7.3.9.5)

SBUA appreciates the level of detail PG&E's WMP provides on its service restoration training for employees and outreach conducted to local agencies on this topic. This level of detail should be required of all utilities.

vii. Protocols on Public Safety Power Shutoff (8.2)

Like SDG&E, PG&E indicates that its Community Resource Centers operate from 8am-10pm.[34] Operating these centers for such lengths of time is commendable but ratepayers may need access to these centers during the nighttime as well, particularly for those who are not able

[32] PG&E WMP, p. 777.

[33] *See* SDG&E WMP, p. 323.

[34] PG&E WMP, p. 869.

to find an overnight shelter. The Division should require the IOUs to explore the need for 24/7 centers and how they can safely operate them.

III. CONCLUSION

SBUA appreciates the opportunity to comment on the 2021 WMPs. We have taken considerable effort to examine these Plans from the small business customer perspective, and hope that the Wildfire Safety Division will take the time at this critical juncture to evaluate the concerns we have noted, to ensure that the Plans are updated to the benefit of all ratepayers.

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