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California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: Comments of Southern California Edison Company on Draft Resolution ESRB-8

In accordance with the instructions included with Draft Resolution ESRB-8 (Draft Resolution), Southern California Edison Company (SCE) respectfully submits these comments on the Draft Resolution to the California Public Utilities Commission (CPUC or Commission).

## **INTRODUCTION**

The Draft Resolution extends the public safety-related de-energization reasonableness, public notification, mitigation and reporting requirements previously established for San Diego Gas & Electric Company (SDG&E) in Decision (D.)12-04-024 to all electric Investor-Owned Utilities (IOUs). It also announces and extends new requirements regarding reporting and public outreach, notification, and mitigation to all of the IOUs. The Draft Resolution does so in light of California's recent experience with wildfires, which it correctly notes "was the most destructive wildfire season on record" and which resulted in five of the 20 most destructive wildfires in the state's history. These fires were so devastating that both the President of the United States and the Governor of California issued State of Emergency declarations. Additionally, Governor Jerry Brown noted that the state was facing a "new normal" with regard to increasing, potentially year-round wildfire risk.

In light of this increasing wildfire risk, SCE is focused on comprehensive wildfire mitigation efforts. These include enhanced situational awareness, partnerships with fire agencies, enhanced vegetation management, hardening of the distribution grid, and certain operational practices such as restricted work during extreme fire conditions, enhanced recloser blocking, and proactive de-energization. While de-energization is only a very small part of the many wildfire mitigation efforts SCE undertakes, we recognize the potential public safety risks of a de-energization event, and are committed to working with the CPUC and local communities to provide information regarding such events, as well as working expeditiously to restore power when the dangerous conditions no longer exist and it is safe to do so.

To that end, SCE offers comments to the new requirements. These comments primarily request changes to the Draft Resolution which will make the material requested effective for those receiving the information, while allowing sufficient time for information to be gathered or

disseminated. Additionally, SCE provides clarifications regarding existing policies on back up generation or batteries and requests the final Resolution reflect these concerns.

## **DISCUSSION**

SCE supports the Draft Resolution's extension of the policies previously applicable to SDG&E to all IOUs.<sup>1</sup> SCE also supports the Draft Resolution's goal of ensuring that the public and local officials are prepared for de-energization and aware of de-energization policies. To this end, SCE has already begun hosting community meetings with areas most likely to be affected by de-energization.<sup>2</sup> While SCE has previously voluntarily made the Safety and Enforcement Division (SED) aware of the likelihood of a de-energization event, it also understands SED's desire for more consistent oversight and thus does not take issue with many of the new reporting requirements. SCE does, however, offer a few suggestions regarding the Draft Resolution's reporting and communications requirements to increase the effectiveness of the information provided to SED.

Reporting. The Draft Resolution requires that reports not only be provided after each event, but also after high-threat events where de-energization policies and procedures were triggered though no de-energization occurred. SCE is constantly monitoring weather conditions as part of its situational-awareness during extreme weather conditions. Therefore, as written, the language is not clear on what the trigger is for providing notice. A clearer and more meaningful reporting threshold might instead be if the IOUs provided reports of "High threat events where the IOU provided notifications to local government, agencies, and customers of possible de-energization." Such a requirement would identify a precise point at which the threat of a de-energization became imminent, while not capturing the vast majority of weather events that put the IOUs on heightened alert for wildfire (e.g., Red Flag Warning weather).

The Draft Resolution also directs the IOUs to summarize the nature and number of complaints received due to the de-energization event, including claims filed against the IOU. SCE clarifies that the complaints to be reported within 10 days after an event would be those specific complaints that initially went to the CPUC and are then directed to SCE Consumer Affairs. In addition, the Draft Resolution should be modified to move the requirement of reporting claims filed against the IOU to be made a part of the reasonableness review. Reporting on claims within 10 days after an event would be incomplete since the statute of limitations on property damage claims from events like de-energization is typically three years. The claims information would be more effective if sufficient time were allowed to account for claims.

Another new requirement is for the IOUs to provide information regarding community assistance locations available during a de-energization event in the post-event report. SCE will provide such information if such locations are made available, however, SCE does not

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<sup>1</sup> The policies were identified in D.12-04-024.

<sup>2</sup> On May 24, 2018, SCE discussed what to expect from de-energization and discuss the de-energization event of 2017 with approximately 60 members of the Idyllwild community.

interpret the Draft Resolution to require the securing of such locations. SCE is and will be in close coordination with counties regarding de-energization, but SCE does not operate assistance locations and has no specific plans to secure such locations. However, SCE is exploring options of providing mobile community amenity units and power trailers to provide facilities for charging cell phones and provide drinking water and ice when and where it is safe and feasible.

Coordination, communication, and public education. SCE also offers comments regarding the direction for IOUs to increase coordination, communication and public education in order to increase public safety and minimize adverse impact from de-energization. Specifically, SCE sets forth below considerations which should be taken into account with regard to the communication of estimated and full restoration times, the holding of informational workshops, and the provision of generators or batteries to critical facilities.

The Draft Resolution directs IOUs to notify SED of a decision to de-energize and include in that notification: the area affected, the estimated number of customers, and an estimated restoration time. SCE has voluntarily notified SED of decisions to de-energize in the past and is committed to doing so in the future as the Draft Resolution requires, however, the proposal's requirement of notification of estimated restoration time should be modified. When such events are occurring, estimates of potential restoration time are, at best, speculative and critically dependent on weather and an IOU's ability to patrol lines prior to restoration. These factors are often not within an IOU's control and can even make estimation of a restoration time impossible. If such information is of absolute necessity to SED, the language should be modified to recognize it only need be provided, "if available under current conditions."

In addition to the notification requirements of a decision to de-energize, the Draft Resolution requires notification of the SED Director within 30 minutes of full restoration. SCE understands SED's need to be aware of the state of restoration during a de-energization event, but notification of full restoration within 30 minutes would be unreliable given the potential for conditions to change at any moment during a high threat event. A more meaningful notification could be provided if the Draft Resolution were adjusted to "provide a notification of full restoration as soon as practicable, but within 12 hours after restoration. If that notification is not possible, a status update of current conditions will be provided." Furthermore, detailed restoration information would be most accurate if included in the post-event report to be filed 10 business days after the de-energization event. At that time, the high threat event will, hopefully, have concluded and more accurate information regarding restoration can be provided.

The Draft Resolution also directs the IOUs to convene De-Energization Informational Workshops within 60 days of the effective date of the Resolution with representatives of entities such as government officials, fire agencies, and Offices of Emergency Management that may be affected by a de-energization event. SCE agrees with SED regarding the importance of proactive public outreach and education in advance of potential de-energization and has already taken steps to address these items, even prior to the issuance of the Draft

Resolution. For example, SCE has been developing and implementing plans to engage local governments and officials, agencies such as offices of emergency management, and impacted customers and has recently conducted meetings to discuss issues related to SCE's Public Safety Power Shutoff Protocol (PSPS)/de-energization.<sup>3</sup>

SCE is currently conducting outreach meetings to notify government officials as well as emergency management and fire agency personnel in High Fire Risk Areas (HFRA) about the PSPS Protocol. SCE has started to inform and meet with staff and elected officials in approximately 125 cities and counties in HFRA. SCE is also identifying opportunities to meet local government organizations such as San Gabriel Valley Foothill Fire Chiefs and San Gabriel Valley City Managers Association. SCE is coordinating separate meetings with local government emergency management and fire personnel to discuss the details of PSPS communications and hear their concerns and issues. SCE will convene these agency outreach efforts within the 60 day requirement.

In addition, SCE is planning on hosting community workshops in conjunction with County Fire and Emergency Management Offices, as well as third parties such as the Red Cross throughout the HFRA to inform and educate customers about the PSPS protocol, and assist them with measures they can take to be prepared and resilient during a de-energization event. The community workshops will be held in selected locations to combine adjacent communities into logical clustering of workshops. SCE is committed to completing these community workshops as soon as practicable. However, due to the size of the areas and number of customers potentially impacted by PSPS, these workshops will take place over a longer time period and would benefit from additional time to complete the outreach. Therefore, SCE is requesting the final Resolution extend the requirement to convene community workshops to 120 days. As such, we are prioritizing these workshops with communities believed to be most likely subject to a PSPS event. For reference, nearly one-third of SCE's 50,000 square mile territory is potentially subject to PSPS, which encompasses approximately two million customer accounts. Over 200 cities and communities are served by circuits that may be de-energized under the PSPS protocol. In addition to these community workshops, SCE will be sending "Dear Neighbor" letters to customers on PSPS circuits, including information in customer bills, and creating a webpage dedicated to wildfire issues including information on the PSPS protocol.

Finally, the Draft Resolution requires that IOUs "ensure" that various critical facilities (i.e. water plants, hospitals, fire departments, etc.) are aware of the de-energization, and offer "generators or batteries" if they do not have adequate existing backup power resources. SCE notes that while such facilities are generally required to have back-up power capabilities, SCE already considers whether additional back-up generation is needed on a case-by-case basis during major outages. SCE coordinates such needs with SCE's Incident Management Teams

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<sup>3</sup> The following meetings were recently held: Community of Idyllwild on May 24, 2018; LA County Disaster Management Area Coordinators on June 12, 2018; San Gabriel Valley Foothills Fire Chiefs on June 18, 2018; and San Gabriel Valley City Managers on June 20, 2018.

and City and/or County Emergency Management authorities, who prioritize emergency generation needs. Such coordination is required because SCE does not have an inventory of generators on hand and relies on available third-party vendors. Additionally, deploying mobile generation utilizes critical field resources that would otherwise go toward monitoring, repair, and service restoration efforts. Because of these issues and others, SCE believes further discussion is warranted before this requirement is implemented. Accordingly, the requirement should be removed at this time and a workshop should be held to discuss these and other concerns.

**CONCLUSION**

SCE appreciates the Draft Resolution's attempt to balance the public safety need for proactive de-energization with the potential risks of such an event. While de-energization is only a small part of the mitigation measures used by SCE during a high threat event, SCE is committed to working with the CPUC, local communities, and its customers before, during, and after a de-energization event occurs. These comments seek to improve the Draft Resolution's recommendations and SCE appreciates the consideration of its comments.

Respectfully,

/s/ Gary A. Stern, Ph.D.  
Gary A. Stern, Ph.D.

GAS:jb:jm

cc: Service List for Draft Resolution ESRB-8