



Kevin M. Payne
President & Chief Executive Officer

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Via Email Transmission Only

President Marybel Batjer
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California Public Utilities Commission
505 Van Ness Avenue, Fifth Floor
San Francisco, CA 94102

RE: CPUC January 19 letter regarding SCE's 2020 Public Safety Power Shutoff (PSPS) performance

Dear President Batjer:

I received the Commission's January 19 letter expressing concerns about SCE's 2020 PSPS execution. I am writing to assure you that we will work closely with the Commission to fully understand those concerns, foster a complete understanding of our PSPS practices, and take whatever actions are necessary to make further improvements.

Undoubtedly, the climate in California is changing – from prolonged drought to increased frequency and severity of extreme weather. In fact, five of the six largest wildfires in California's history took place last year and average rainfall totals across Central and Southern California remained 50%-75% below normal through mid-January. Such drought conditions, coupled with exceedingly low fuel moisture and very strong wind gusts, increase the risk for ignition and spread of catastrophic wildfires.

PSPS is a tool that we occasionally use to avoid catastrophic wildfires during such severe weather events. We fully recognize that PSPS events create hardships and significantly impact the daily lives of our customers – the families and businesses in high fire risk areas – a burden even more consequential with so many customers working and learning from home.

However, we also know that it is a valuable tool for protecting public safety during severe weather. In 2019-2020, post-PSPS patrols conducted prior to re-energization found 60 instances of avoided potential ignitions, including dislodged tree branches blown into power lines and crossarms damaged by dangerous winds. We know there were likely even more potential ignitions avoided because flying debris will often contact power lines and then fall to the ground, avoiding post-event detection.

Please know that we do not use PSPS lightly. We share the desire of the CPUC, CalOES and CALFIRE to minimize the scope, scale and duration of PSPS events, while minimizing the impact

to those that are affected. We are learning, adapting and hardening our system so we can be even more targeted in conducting PSPS only when needed. Our increasing proficiency in executing PSPS events resulted in an average 33% shorter de-energization duration and 22% fewer total customer minutes of interruption in 2020. Unfortunately, abnormal weather caused four PSPS events from late November to late December, placing a significant burden on frequently impacted communities. We stand by the necessity to de-energize during these events, as we found eight instances in post-event patrols which could have ignited dangerous wildfires and, for the reasons mentioned earlier, we know that even more potential ignitions were likely avoided.

SCE continues to invest in circuit mitigations, customer care, external communications and notifications and advanced wildfire risk reduction tools. This includes expanding circuit-specific grid hardening and PSPS mitigation plans, particularly for frequently impacted circuits. We will be expanding our free battery backup program to include all income-qualified medical baseline customers in addition to critical care customers in high fire risk areas. Community outreach will continue, especially to access and functional needs customers, emphasizing both PSPS readiness and emergency preparedness. In response to customers' concerns, we undertook several actions in 2020 to reduce the impact of PSPS events, including providing unique holiday customer care such as serving hot meals, providing food gift cards and increasing deployment of Community Resource Centers (CRC) by 300% (13 in 2019; 56 in 2020.)

We also recognize the importance of getting customer notifications right. The variance between customer notifications sent and actual number of customers de-energized reflects, in part, SCE's commitment to de-energize as few customers as possible while protecting public safety and adhering to notification requirements. We make the final decision to de-energize based on real-time weather conditions, not forecasts, and after we take all available mitigation steps such as switching load to other non-impacted circuits. While we are pleased we have been able to reduce the number of customers de-energized using these mitigations, we are also working to refine the granularity of our weather forecasting to narrow the gap between notifications and de-energizations and improve the clarity and accuracy of our notification processes.

We look forward to providing additional detail and context to the issues raised in the letter, many of which we believe are critical enhancements to our ongoing PSPS improvements. We also believe the letter highlights some areas where there is a misunderstanding of our approach, or ambiguity in PSPS requirements. We appreciate your invitation to work with the State to clarify expectations and improve execution.

We understand that more is expected of us, and we look forward to discussing areas for improvement in 2021 and steps we are taking to address feedback we have received as we

mature our capabilities. Our customers, emergency response agencies, and local governments are valued partners, and we will continue to take actions to improve our engagement, communication and coordination with them.

Even as we further harden the system, we expect PSPS to be a necessary – albeit more rarely used – tool for wildfire risk mitigation. We welcome a discussion with the Commission and other stakeholders to inform our proposal for further actions in the February 12 Action Plan filing, and we thank the Commission and public safety partners for their efforts to protect the public during this extraordinary wildfire season.

Sincerely,



Kevin M. Payne

cc:

Service Lists for: R.18-12-005 and I.19-11-013

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