STATE OF CALIFORNIA

PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



August 31, 2021

Via Email Transmission Only

Patricia K. Poppe Chief Executive Officer Pacific Gas and Electric Company 77 Beale Street, Mail Code B13U San Francisco, CA 94177

Kevin Payne President and Chief Executive Officer Southern California Edison Company 2244 Walnut Grove Avenue Rosemead, CA 91770

Caroline Winn Chief Executive Officer San Diego Gas & Electric Company 8330 Century Park Court San Diego, CA 92123

Re: August 2021 Public Safety Power Shutoff Public Briefings

Dear Ms. Poppe, Mr. Payne, and Ms. Winn:

Thank you for your company's informative presentation during the Public Safety Power Shutoff (PSPS) Public Briefings held by the California Public Utilities Commission (CPUC) on August 2 and August 3, 2021. My fellow CPUC Commissioners and I, as well as the leaders who joined us from the California Governor's Office of Emergency Services (Cal OES), California Department of Forestry and Fire Protection (CAL FIRE), and Office of Energy Infrastructure Safety (OEIS), appreciated the information you provided. It is crucial that your company continues to inform our agencies and the public on the progress you have made since last year and the status of your preparedness for the 2021 wildfire season and potential PSPS events.

In 2020, Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) proactively shut off power to nearly one million customers. In some cases, notifications were not sent prior to the power shut off and in other cases, customers were notified but ultimately were not de-energized. While these power shutoffs were an effort to reduce the risk of wildfires caused by utility electric infrastructure, the shutoffs and false communications resulted in numerous negative consequences, including public safety concerns. Under Public Utilities Code Section 451, an

IOU has the obligation to furnish and maintain service that is necessary to promote the safety, health, comfort and convenience of its customers, employees, and the public. It is imperative that your companies deploy PSPS as a measure of last resort, and only when the benefit of power shutoffs outweighs potential public safety risks. With increasing drought and wildfire risk in 2021, each of your companies must continue to fulfill your obligations under existing laws, rules, and directives, improve the safe and competent execution of PSPS events, and reduce the negative safety impacts on Californians.

A number of questions were raised over the course of the August 2021 PSPS Public Briefings that require additional information from your companies. For the safety and the well-being of Californians, I request responses and updates as set out below:

- <u>PSPS Decision:</u> An update on how climate change, grid hardening (covered conductor and undergrounding) and vegetation management factor into your company's risk model. With the increased implementation of grid hardening and vegetation management to date, what is your estimated number of PSPS events and average and maximum event duration in 2021? What changes in the threshold framework under which you will consider calling a PSPS event have been made from last year to this year, if any? Please provide an update on sharing a technical decision fact sheet with public safety partners and publishing the same information on your website.
- Engagement with local community-based organizations (CBOs): Please provide an update on engaging with local CBOs, particularly, any increase on the number of the CBOs engaged and the support provided to the local community. If you have significantly fewer partnerships with CBOs than your peer utilities included on this letter, please explain why that is the case. For example, we heard at the briefings that PG&E only has a few hundred CBO partnerships while SCE has over a thousand. In addition, how does your company compensate CBOs who are engaged on PSPS events? Do ratepayers pay these costs?
- <u>Medically Vulnerable Customers and Equipment</u>: Please identify the number of medically vulnerable customers dependent on powered medical equipment in areas potentially impacted by PSPS that have not received the backup batteries your company has committed to providing as of the date of this letter. What is the total number of batteries that will be deployed and the timeline to achieve full deployment of the batteries? Please explain in detail how you educate the customers on operating the batteries and how your company services or replaces batteries that are not working. What is the size and duration of each battery? What are the prices of back-up generators that your company provides to customers and that your company provides rebates for (i.e. only partial cost deferral)? What is the value of the rebates that your company provides? What fuel is being used in back-up generators?
- <u>Access and Function Needs (AFN) customers:</u> Provide an update on your company's efforts to identify AFN customers in your service territory, particularly those in high fire risk areas. How granular is this information and how is your company using it to mitigate the impacts of PSPS on these customers?
- <u>Community Resource Centers (CRCs)</u>: How do you measure if the CRCs meet the community need? Have any public officials in your service territory requested additional

CRCs? Have additional CRC locations been requested but not granted? If so, why not?

- <u>Tribal Government Outreach:</u> Please provide an update on your company's consultation with tribal governments.
- <u>PSPS Exercises:</u> Please provide an update on the lessons learned from last year and this year's exercises. How will these lessons be applied to actual PSPS execution for improvement?
- <u>Pilot Project</u>: As part of Governor's Executive Order from last year, CPUC ordered the utilities to propose pilot projects that support both grid hardening work and underserved communities. Please provide an update on your pilot projects.

Please respond by September 16, 2021 with a letter, including any necessary attachments, transmitted via email to my fellow CPUC Commissioners and me, with a cc to the service lists for R.18-12-005 and I.19-11-013 and the list of persons below. Our staff may follow up with you to address other questions as needed.

Please know that my fellow CPUC Commissioners and I share a deep concern for the safety and well-being of Californians. With more maturity on PSPS execution, we have the highest expectations of your companies during this 2021 wildfire and PSPS season.

Sincerely,

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CC:

Service List for R.18-12-005 and I.19-11-013 Meredith Allen, Senior Director, PG&E Regulatory Regulations (meae@pge.com) William Blattner, Manager, Regulatory Relations, San Diego Gas & Electric (wblattner@semprautilities.com) Diana Gallegos, Senior Lobbying Advisor, Southern California Edison (diana.s.genasci@sce.com) Caroline Thomas Jacobs, Director, Office of Energy Infrastructure Safety (caroline.thomasjacobs@energysafety.ca.gov) Rachel Peterson, Executive Director, CPUC (rachel.peterson@cpuc.ca.gov) Arocles Aguilar, General Counsel, CPUC (arocles.aguilar@cpuc.ca.gov) Leslie Palmer, Director, Safety & Enforcement Division, CPUC (leslie.palmer@cpuc.ca.gov) Edward Randolph, Deputy Executive Director for Energy and Climate Policy, CPUC (edward.randolph@cpuc.ca.gov)