



**Workshop 2 in Phase 2 of R.15-06-009  
Utility Disaster Planning & Emergency Response**

# **Electric Utilities and PU Code Section 768.6**

**Quang Pham, P.E. – Senior Utilities Engineer  
Electric Safety and Reliability Branch (ESRB)  
Safety and Enforcement Division (SED)  
California Public Utilities Commission**

**September 28, 2018**





## ***ESRB Disclaimer***

- The Electric Safety and Reliability Branch represents the Safety and Enforcement Division as a party in R.15-06-009.
- The recommendations and suggestions in this presentation do not necessarily reflect the views of other staff in the Safety and Enforcement Division or the views of the California Public Utilities Commission.





# Background

- PU Code Section 768.6(d) requires meetings “..no later than April 1, 2013, and every two years thereafter”
- SED has not formally reviewed compliance with Section 768.6 for all electric utilities
- Some utilities address Section 768.6 as part of annual GO-166 submittals
- Data requests sent to electric utilities after Workshop 1





# Public Meetings

- Section 768.6(b)(1)(A) - In developing and adopting an emergency and disaster preparedness plan, an electrical corporation providing service in California shall invite appropriate representatives of every city, county, or city and county within that electrical corporation's service area in California to meet with, and provide consultation to, the electrical corporation.
- Section 768.6(g) allows for presentation at "...regularly scheduled public meeting of each disaster council created pursuant to Article 10 (commencing with Section 8610) of Chapter 7 of Division 1 of Title 2 of the Government Code within the corporation's service area, or at a regularly scheduled public meeting of the governing body of each city, county, or city and county within the service area. "





# Public Meetings

- Section 768.6(b)(3) "Every two years, in order to update and improve that electrical corporation's emergency and disaster preparedness plan, an electrical corporation providing service in California shall invite appropriate representatives of every city, county, or city and county within that electrical corporation's service area to meet with, and provide consultation to, the electrical corporation."
- Section 768.6(c) "...shall be noticed and shall be conducted in a public meeting that allows for the participation of appropriate representatives of counties and cities within the electrical corporation's service area."
- Section 768.6(c)(2) ".. may convene a closed meeting with representatives from every city, county, or city and county within that electrical corporation's service area to discuss sensitive security-related information..."





# Public Meetings

Each utility has held or participated in some of the following:

- Regional and emergency plans specific meetings with invitations to local governments
- Operational Area Meetings
- Disaster management council meetings
- Mutual aid association meetings
- Hydroelectric Project annual meetings
- Live webinars
- Outreach outside of meetings (disaster management councils, city and county government, stakeholders)





# Public Meetings – Best Practices

- Master list of all counties and cities within electric utilities' territory
- Invitation list
- Correspondence with local government/invitees
- Attendance/sign-in sheet
- Meeting agenda
- Notes and materials from meeting
- At the minimum, emergency response and disaster preparedness plan must be presented and discussed at meeting





# Public Meetings - Questions

- Can other meetings count towards requirement?
- How many attempts should utility make to contact local governments?
- What if local governments refuse to attend or participate?
- Local government: is every two years adequate?
- Who are considered “appropriate representatives”?
- What material must be covered in these meetings?







## Feedback, Input, and Consultation

- Section 768.6(b)(1)(C) – “...provide the point of contact designated pursuant to subparagraph (B) with an opportunity to comment on draft emergency and disaster preparedness plans.”
- Section 768.6(c)(2) – “...provide participating counties and cities with opportunity to provide written and verbal input regarding the corporation’s emergency and disaster preparedness plan...”





# Feedback, Input, and Consultation

Some utilities have done the following:

- Sent their Emergency Plans to attendees prior to the meeting
- Given attendees opportunity to provide verbal feedback during the meeting
- Provided their contact information to attendees for verbal and written feedback after the meeting
- Most feedback received are currently not being tracked
  - Some attendees/participants do not feel that their feedback are heard or incorporated





## Feedback, Input, and Consultation – Best Practices

- Master list of all points of contacts
- Record of written comments and feedback
- Record of verbal comments and feedback
- Feedback and input tracker
- Correspondence with local government
  - Verbal or written acknowledgement
- Plan must be provided to attendees/local government, gives them opportunity to review and provide feedback
- Opportunity to provide input by those who cannot attend meetings





## Feedback, Input, and Consultation - Questions

- How are comments on emergency and disaster preparedness plan collected?
  - How are comments tracked and addressed?
  - How are commenters informed about their comments?
- How many point of contacts are adequate?
  - What if local government have multiple departments?
- Should the utilities share confidential or only public version of their emergency plans?





# Notification to the CPUC

- Section 768.6(c)(3) – Shall notify the commission of the date, time, and location of meeting
- Section 768.6(e) – Memorialize a meeting and submit its records of the meeting to the commission.





# Notification to the CPUC

Currently notifications are being sent to:

- Executive Director
- SED Management
- Some notifications are not sent to the Commission at all





## Notification to the CPUC – Best Practices

- CPUC needs to be notified prior to meeting/event
- Record keeping as mentioned above needs to be kept and provided to CPUC
- CPUC should specify who must be notified
- Electric Safety compliance mailbox:  
[ESRB\\_ComplianceFilings@cpuc.ca.gov](mailto:ESRB_ComplianceFilings@cpuc.ca.gov)





# Conclusion

- Incorporating the requirements of PU Code Section 768.6 into GO 166 would assist SED in determining compliance with its requirements.
- SED's PHC Statement contains recommendations for modifications
- Look forward to working with interested parties to develop proposed revisions







# Questions?

