



Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations

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Elizaveta Malashenko
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

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

INTRODUCTION

Pursuant to the instructions included with Draft Resolution ESRB-8 (Draft Resolution), Southern California Edison Company (SCE) respectfully submits these reply comments on the Draft Resolution to the California Public Utilities Commission (CPUC or Commission). Several parties submitted opening comments on the Draft Resolution, including numerous communication companies (the Joint Communication Providers). The Joint Communication Providers generally support the Commission's effort to establish de-energization policies for all investor-owned utilities (IOUs), but also seek to impose certain "process enhancements," including "notice procedures" on the IOUs in connection with a potential de-energization event. SCE appreciates the Joint Communication Providers' concerns; however, for the reasons explained below the Commission should decline to adopt them in the Final Resolution.

DISCUSSION

A. De-Energization Informational Workshops

The Joint Communication Providers request that the proposed de-energization informational workshops include working sessions "dedicated to identifying the full potential impact of de-energization on public safety and on other stakeholders...including communication companies..."¹ SCE agrees that all interested stakeholders, including the Joint Communication Providers, should be included at these workshops. To address the suggestion by Joint Communication Providers that workshops include working sessions, SCE has already started separate outreach efforts with communication companies to discuss SCE's de-energization program, including Public Safety Power Shut-off protocols and address the impacts, concerns and needs of the Joint Communication Providers during such events. SCE

¹ Joint Communication Providers' Opening Comments, p. 3.

believes the separate outreach efforts will address the Joint Communication Providers desire to have more detailed discussions with the utility.

While SCE agrees that stakeholder feedback is important, we strongly disagree with the Joint Communication Providers' recommendation that the Draft Resolution be changed to require the IOUs to use such feedback to develop pre-established clear criteria for what constitutes "extreme fire danger" or other emergency situations in which de-energization could be considered by the IOUs as an option."² This proposal is unreasonable, and would deprive SCE of the operational discretion needed for determining whether or not to implement its de-energization program during a critical event.

SCE takes this responsibility seriously and fully recognizes the potential public safety impacts from a de-energization event, and will exercise utmost care to appropriately weigh the benefit to risk tradeoff of each event. The Joint Communication Providers fail to consider the fact that the decision to de-energize is made in real time, after consideration of various and often rapidly changing, factors such as weather conditions. It would be very difficult for SCE to develop an all-encompassing set of criteria covering each potential de-energization scenario—let alone a set of "clear" criteria. Indeed, if SCE were compelled to create requirements that are too prescriptive based on stakeholder feedback, this would undermine the very purpose of SCE's de-energization program. SCE therefore respectfully submits that it should be given operational discretion to implement its de-energization program as appropriate and under the circumstances facing the utility at the time of the potential de-energization event.

B. Notification

The Joint Communication Providers also recommend that IOUs "provide advance notification to communications providers in all cases of power de-energization *as soon as an IOU determines a power shut off is likely* and further recommend that the notice include detailed information about the geographic scope of the planned de-energization."³ SCE agrees that it is important to notify customers, including communication providers, prior to the decision to de-energize when possible. And, accordingly, SCE is committed to notifying all customers prior to de-energizing if conditions allow. But the Commission should avoid imposing a requirement on SCE and other IOUs requiring notification in advance of a pre-emptive de-energization, as this may not be possible in all instances. Furthermore, SCE would also like to clarify that advance notification may only come when associated with a *pre-emptive* de-energization—and not all cases of power de-energization. For example, advance notification may not be provided for outages that occur on SCE's grid during normal operations when faults occur and automated protective devices operate accordingly.

² *Id.*, p. 3 (Emphasis added).

³ *Id.*, p. 4.

C. Reporting and Post Event Analysis & Process Improvement

The Joint Communication Providers also recommend the Commission require the post shut-off report be made available to the public for comment and review in order to demonstrate stakeholders, including communications providers, were provided with adequate and timely notice of the planned de-energization event.⁴ As stated in the Notification section, SCE agrees that it is important to notify all customers prior to a decision to de-energize when possible, and if conditions allow. However, SCE does not agree with the Joint Communication Providers' recommendation for parties to have an opportunity to comment on the post de-energization event report. Such a requirement should be addressed in the Reasonableness Review discussion, which has explicitly been stated as beyond the scope of this Resolution.

Nonetheless, to address these suggestions raised by Joint Communication Providers, SCE is considering a process similar to SDG&E's. That is, SCE will make reasonable attempts after a de-energization event to convene meetings with impacted communities and other stakeholders regarding the event. In that forum, SCE is willing to review the de-energization event and the decisions made and solicit feedback that might be used to minimize the impacts of future de-energization events and help improve our process.

CONCLUSION

SCE appreciates the concerns raised by the Joint Communication Providers, and understands the need for stakeholders to be involved and informed about the utility's de-energization program. SCE is committed to working with the CPUC, local communities, its customers and other stakeholders before, during, and after a de-energization event.

Sincerely,

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

GAS:jb:jm

cc: Service List for Draft Resolution ESRB-8
Lana Tran, CPUC, Safety and Enforcement Division

⁴ *Id.*, p. 4.