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June 28, 2018

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

Re: San Diego Gas & Electric Company's Comments on Draft Resolution ESRB-8

Dear Ms. Malashenko:

In Draft Resolution ESRB-8 ("Draft Resolution"), the Commission proposes to extend the requirements established in D.12-04-024 related to de-energization events to all electric investor owned utilities ("IOUs"), along with additional requirements pertaining to meeting with communities impacted by de-energization events, customer notifications, and notifications to the Safety and Enforcement Division ("SED"). In accordance with Section 311(g)(1) of the Public Utilities Code, the Draft Resolution is subject to comments and public review, and SDG&E hereby provides its comments.

In general, SDG&E supports the Draft Resolution and has been operating pursuant to D.12-04-024 since the issuance of that decision. SDG&E already complies with many of the requirements specified in the Draft Resolution. But as discussed in detail below, SDG&E also believes that certain modifications or clarifications to new requirements set forth in the Draft Resolution are warranted.

I. REPORTING

The Draft Resolution lists five items that IOUs must include in reports submitted to SED following each de-energization event.¹ Generally, SDG&E supports the requirement to submit post-event de-energization reports and has done so to date. SDG&E also notes that while it recognizes the importance of reporting to SED after each de-energization event, it sees no compelling rationale to report "after high-threat events where de-energization policies and procedures ... were triggered though no de-energization occurred." SDG&E believes it is more appropriate and less burdensome to confine reporting to events where a de-energization actually took place.

¹ Draft Resolution, p. 5.

Furthermore, since the Draft Resolution requires the IOUs to contact “local communities’ representatives,”² SDG&E requests a clear definition of that term. In addition, this reporting section appears to assume that there is time to meet and discuss de-energization with such representatives in person or well in advance of an event, which is most often not possible given the immediacy and nature of de-energization.

SDG&E appreciates that SED wants the IOUs to provide advance notifications to customers, where feasible, and SDG&E agrees that such notice is important and strives to provide it. However, SDG&E has concerns with the requirement that it provide an explanation in its report if it is not able to “provide customers with notice at least 2 hours prior to the de-energization event” because doing so is not always feasible in light of prevailing conditions and circumstances. For instance, in the past, SDG&E has made de-energization decisions in the middle of the night, in which case it often does not call and awaken customers. Weather conditions can change rapidly, not allowing enough time to notify customers prior to de-energization. SDG&E does, however, currently take several steps to notify customers in advance of de-energization events. For example, prior to a Red Flag condition event when de-energization could be initiated, SDG&E provides emergency preparedness communications to customers to alert them of possible power outages prior to de-energization. In addition, when feasible, SDG&E provides an imminent de-energization notification to customers impacted prior to 9:00pm and after 7:00am. In sum, the final resolution should eliminate the two hour threshold, and it should instead simply require that IOUs provide an explanation if is not able to provide customers with notice prior to a de-energization event.

II. REASONABLENESS REVIEW

The Draft Resolution proposes to continue the reasonableness review criteria from D.12-04-024.³ SDG&E largely agrees with those criteria but notes that the third criterion, which provides as follows, is too specific: “SDG&E must reasonably believe that there is an imminent and specific risk that strong winds will topple its power lines onto tinder dry vegetation during periods of extreme fire hazard.”⁴ SDG&E proposes to revise this criterion as follows: “SDG&E must reasonably believe that there is an imminent and specific risk that strong winds will lead to an ignition involving powerlines and tinder dry vegetation during periods of extreme fire hazard.” The rationale for this revision is that strong winds can cause powerline-related ignitions in several ways, and not just from toppling powerlines. For instance, foreign objects or vegetation – even where appropriately trimmed or mitigated in accordance with applicable requirements – can be blown into powerlines in strong winds, and SDG&E believes it is both reasonable and necessary to de-energize to prevent those types of ignitions.

² *Id.*, p. 5.

³ *Id.*, p. 5.

⁴ *Id.*, p. 4.

III. PUBLIC OUTREACH, NOTIFICATION AND MITIGATION

The Draft Resolution lists seven, bulleted requirements related to public outreach, notification, and mitigation. SDG&E agrees with the importance of coordination, communication, and public outreach to increase public safety and minimize potential adverse impacts of de-energization events. However, given SDG&E's practical experience with de-energization events, concerns with several of these requirements are noted below.

First, SDG&E would like to note that, in many instances, the decision to de-energize facilities is made in a short period of time, and imposing reporting requirements in that narrow window adds to the complexity of utility decision-making under difficult circumstances. SDG&E believes that it would be more appropriate to notify the Director of SED upon activating its Emergency Operations Center ("EOC"), which is an event that precedes most decisions to de-energize. Such a notification would alert SED to existence of potentially severe wind and weather (or other emergency) conditions that could ultimately lead to a decision to de-energize. In addition, since the EOC may be activated for several days, SDG&E will provide at least daily updates to the Director of SED during EOC activation.

Relatedly, SDG&E objects to the requirement to notify the Director of SED "of full restoration within 30 minutes from the time the last service is restored."⁵ Instead, SDG&E proposes that IOUs should notify SED within 12 hours of final restoration.

Second, SDG&E submits that the workshops involving representatives of entities that may be affected by the most recent de-energization event are unnecessary and redundant with respect to SDG&E and its customers. SDG&E has a well-established practice of engagement with the community around fire preparedness. Since 2008, SDG&E has led the Community Fire Safety Program ("CFSP"), which is aimed to supplement communications and increase awareness to customers, especially in high risk communities of San Diego County, regarding the CFSP and Emergency Preparedness, including education on SDG&E's de-energization procedures. Most recently, between March and April of 2018, SDG&E leadership conducted six public town halls discussions in each of the communities which were deenergized for public safety in December 2017. An additional town hall was held on the Campo Indian Reservation to meet with tribes impacted by the de-energization. These town halls were conducted in collaboration with 2-1-1 San Diego, the American Red Cross, and with attendance of fire officials, Community Emergency Response Team ("CERT") leaders, and law enforcement. The intent of the town halls was to provide information on emergency preparedness measures, SDG&E's advancements in fire preparedness, weather monitoring and emergency response, as well as a discussion of sample factors taken into consideration when deenergizing for public safety during a Red Flag Warning event. Additionally, the meetings were an opportunity for members of the public to voice honest feedback on SDG&E's proactive de-energization, and for the group as a whole to brainstorm on improvements to customer support during Red Flag Warning events. Accordingly, SDG&E submits that there is no need to repeat this work, including the associated reporting requirements. SDG&E believes it would be more appropriate

⁵ *Id.*, p. 5.

to submit a report on the workshops and other events it has already conducted. SDG&E will continue engaging its customers and other regional stakeholders about fire safety and de-energization on an ongoing basis.

Third, SDG&E objects to the requirement that IOUs offer to provide available generators or batteries to critical facilities. As an initial matter, "critical facilities" is a vague and overly broad term, and while the Draft Resolution listed "hospitals, emergency centers, fire departments, and water plants" as examples, that list alone, even without broadening it, could encompass potentially hundreds of facilities in SDG&E's service territory. SDG&E can also easily envision a situation where other public agencies, businesses or customers contend that they constitute "critical facilities" and should be provided with generators or batteries. Moreover, there are significant, unaddressed problems with the generator or battery requirement. Specifically, many of these critical facilities provide essential services and should have the obligation to provide their own back-up generation. It is not appropriate to have SDG&E ratepayers fund such a service, when that service is required for another sector's emergency power. The Draft Resolution also does not address questions such as who will install, operate and maintain this equipment. Additionally, the IOUs would potentially need to devote significant field personnel to this equipment, if required to install or maintain it, drawing away resources that are otherwise needed to patrol lines or undertake other emergency response functions in connection with de-energization events. Generators can also pose safety risks, and the Draft Resolution does not address the liabilities (or who will bear those liabilities) that such facilities may pose. Ultimately, critical facilities should provide their own generators or batteries to the extent necessary.

IV. CONCLUSION

SDG&E appreciates SED's efforts in extending the de-energization requirements to the IOUs and asks that SED take these comments into account in developing a final resolution.



CLAY FABER
Director – Regulatory Affairs

cc: Ms. Alice Stebbins, Executive Director