



Clay E. Faber
Director - California and Federal Regulatory
8330 Century Park Court, CP32F
San Diego, CA 92123
Tel: 858.654.3563
CFaber@semprautilities.com

July 6, 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 Reply 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, SDG&E submitted comments on June 28, 2018. SDG&E respectfully submits reply comments to address joint comments submitted by The Center for Accessible Technology (CforAT) and The Utility Reform Network (TURN), as well as comments by the Joint Parties.

I. CFORAT AND TURN

CforAT and TURN acknowledge in their comments that SDG&E has taken a number of steps to help mitigate the impact of de-energizations on its affected customers, including notifying customers, providing water, wifi, and battery support.¹ But CforAT and TURN describe these steps as "modest," and recommend that the Commission modify the Draft Resolution to "identify...issues (financial support, evacuation support, needs of at-risk populations, availability of care centers)...that must be given consideration in developing a mitigation plan."² SDG&E disagrees with this recommendation. SDG&E already works closely with its affected communities. Through these collaborations, SDG&E may well consider additional mitigation measures. But SDG&E and other utilities should not be required to

¹ Comments of the CforAT and TURN on Draft Resolution ESRB-8 (CforAT and TURN Comments), p.4.

² Id.

consider adopting specific mitigation measures. This would establish a legal requirement in a vacuum. Additional mitigation measures should not be addressed by the Commission outside of a proceeding that also addresses the implications of those mitigation measures, including, among others, the potential safety consequences of the measures and the appropriateness of having utility ratepayers bear the costs of those measures. Accordingly, the Commission should reject the proposal by CforAT and TURN to require utilities to consider additional mitigation measures.

SDG&E also takes issue with any suggestion that its outreach and mitigations measures are “modest.”

Customer Notification

During de-energization events, SDG&E takes multiple and varying efforts to contact customers. Specifically, SDG&E sends outbound calls, e-mails, and text messages, as applicable, to customers as far in advance as we reasonably think their circuit may be impacted. For medically sensitive customers enrolled in our Medical Baseline program, and for temperature sensitive customers, we use an automated calling system; if a customer isn't reached we follow-up with a live call and, if the customer still is not reached, we send a company representative to the customer's home. SDG&E also has partnerships with agencies that help serve customers that have special needs and works throughout the year to communicate with these customers to have an emergency plan. Additionally, SDG&E disseminates information about the outages and weather conditions through our digital channels, such as our website and social media apps. SDG&E also notifies elected officials, emergency managers, key local agencies, dispatch centers, and first responders. In sum, SDG&E goes to great lengths to keep our customers, elected officials, and emergency responders aware before and during de-energization events.

Mitigation Measures

SDG&E takes steps to minimize the impacts of de-energization. This includes using all our communication channels to encourage customers throughout the year to be prepared for fire season and for all potential emergencies. SDG&E also coordinates with public agencies, such as the American Red Cross and County Office of Emergency Services (OES), to increase awareness of available shelters or customer care centers as necessary. SDG&E also provides Medical Baseline customer contact information for circuits of high probability of an outage to the San Diego County Office of Emergency Services under an agreement the information can only be used for emergency purposes. These are just a few of the key steps that SDG&E has taken to lessen the effects of de-energizations on affected communities.

II. JOINT PARTIES

The Joint Parties ask the Commission to post utilities post-event reports and seek comments on those reports. The Joint Parties argue that the Commission should seek “the input

and feedback of all stakeholders....”³ SDG&E objects to this proposal. The purpose of the report is to inform the Commission and its safety staff about a de-energization event. This is not a matter that requires a public-comment period. Interested parties are able to review these reports if they choose. Interested parties are also free to let the Commission know if they have matters that they would like to bring to the Commission’s attention regarding a de-energization event. Indeed, members of the community have done so in the past. The Joint parties, as major communications companies, certainly know how to voice issues at the Commission.

Utilities make critical safety-related decisions every day. These decisions and reports to the Commission are not matters for routine public comment. To the extent the Commission or its SED staff has any concerns about a de-energization or other kind of utility decision, the Commission has the ability to open a proceeding to seek public comment.

III. CONCLUSION

SDG&E appreciates CforAT and TURN’s concern for affected communities during de-energization events. SDG&E shares those concerns. This Resolution should not be used to establish a new legal requirement to consider additional mitigation measures, however. Without a record or consideration of the implications of specific measures, it is inappropriate to require utilities to consider additional measures. SDG&E also opposes the Joint Parties’ proposal to require the Commission to seek public comment on utilities’ de-energization reports. These reports serve a specific purpose for the SED and Commission. Public comments can be sought on a case-specific basis if the need arises. SDG&E appreciates the opportunity to provide these reply comments.

/s/ Clay Faber
CLAY FABER
Director – Regulatory Affairs

cc: Ms. Alice Stebbins, Executive Director

³ Comments of the Joint Parties, p. 8.