STATE OF CALIFORNIA
GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE

March 17, 2020

Dan Skopec
Vice President, Regulatory Affairs
San Diego Gas and Electric
8330 Century Park Court
San Diego, CA 92123- 1530

Dear Mr. Skopec:

With this letter, I request that San Diego Gas and Electric (SDG&E) begin making all necessary and proper preparations to implement directives that are reasonably likely to result from a Track 1 Decision in the Microgrids and Resiliency proceeding (R.19.09-009), as already required under California Public Utilities Code, Section 451; General Order 166 and other provisions of law. A stated objective of Track 1 of the Microgrids and Resiliency proceeding is to make necessary programmatic changes that would allow for deployment of more resiliency projects before the 2020 wildfire season. To achieve this goal, SDG&E must anticipate the impacts on its own operations from directives that could come from the proceedings at the California Public Utilities Commission (CPUC) and be ready to implement them immediately. While SDG&E should not assume any outcome from the proceeding has already been determined, based on the record in the proceeding, SDG&E can be taking some "no regrets" actions now to help reduce the impacts of wildfires and Public Safety Power Shutoffs (PSPS) in 2020 and thereafter.

In the Microgrids and Resiliency proceeding, CPUC staff and SDG&E, among the other large investor owned utilities, have submitted proposals for short term actions that could be accomplished in preparation for the 2020 fire season. The Staff Proposal, along with the SDG&E proposals dated January 21, 2020, recommended the following short-term actions to accelerate the deployment of microgrids and related resiliency solutions:

1) Accelerate Interconnection of Resiliency Projects.
2) Modernize Tariffs to Maximize Resiliency Benefits.
3) Share Information with Local Government Agencies.
4) SDG&E Local Area Distribution Controller
5) SDG&E Electric Vehicle Charging Infrastructure

I ask that SDG&E begin making all necessary and appropriate preparations to implement uncontroversial recommendations such as:

- Meeting and conferring with other industry stakeholders to standardize the single line diagrams used to illustrate interconnection applications. This can be initiated by electric utilities without intervention from the regulator, especially if doing so would expedite approval of interconnections for vital resiliency projects in advance of fire season.

- Requesting and justifying any necessary deviations from SDG&E's Rule 21 that would enable SDG&E to expedite the interconnection of key locations, facilities, and/or customers, including proposing criteria for what projects would be eligible.
- Committing additional staff and information technology resources to SDG&E's interconnection and distribution upgrade teams in order to accelerate the interconnection of key locations, facilities, and/or customers.
- Providing information to local government agencies that would enable local jurisdictions in SDG&E's service territory to effectuate their respective emergency plans or engaging with them to provide SDG&E technical support for local government resiliency projects. Examples of activities that SDG&E could initiate include:
    - Informing local and tribal governments about SDG&E's electric transmission and distribution investment and operational plans that would help minimize the use and duration of PSPS events.
    - Holding face-to-face workshops to educate local jurisdictions on electric transmission and distribution infrastructure serving their communities.
    - Providing access to detailed historical PSPS outage data to local and tribal governments to help identify resiliency project development opportunities.

With regards to cost recovery, I also remind SDG&E that the CPUC previously authorized SDG&E to track expenditures related to implementation of its wildfire mitigation plans within the Wildfire Mitigation Plan Memorandum Account (WMPMA). SDG&E may use the WMPMA to track incremental costs incurred to implement an approved wildfire mitigation plan that are not otherwise recovered in SDG&E's adopted revenue requirements. Such costs may include but are not limited to expenses and capital expenditures for activities such as operational practices and public safety power shutoffs.

In conclusion, I request that SDG&E prepare itself to respond expeditiously to any directives that arise from the CPUC's Microgrids and Resiliency proceeding. I also remind SDG&E that it, in parallel with the progress of Track 1 activity in R.19-09-009, must continue to fulfill its obligations under existing laws, rules, and directives to prepare for fire season and reduce the impacts of PSPS events on Californians.

Sincerely,

Alice Stebbins
Executive Director

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