June 28, 2018

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

Re: Comments of Pacific Gas and Electric Company on Draft Resolution ESRB-8

Dear Ms. Malashenko:

I. INTRODUCTION

In accordance with the instructions included with the draft Resolution Extending De-Energization Reasonableness, Notification, Mitigation and Reporting Requirements in Decision 12-04-024 to all Electric Investor Owned Utilities (Resolution ESRB-8) (Draft Resolution), Pacific Gas and Electric Company (PG&E) hereby submits its comments on the Draft Resolution.

PG&E appreciates the California Public Utilities Commission’s (CPUC) continued efforts to address the ways in which electric utilities can mitigate wildfire risks in the face of the “new normal” of climate change. Proactive de-energization of electric facilities may be an effective tool of last resort for preventing wildfires under extreme fire danger conditions. PG&E therefore supports the CPUC’s application of the requirements of Decision (D.) 12-04-024 to all electric investor owned utilities (IOU) and its development of reporting, outreach, and notification requirements that can help the Commission and the public understand de-energization events before, during, and after they take place.

Overall, PG&E supports the Draft Resolution and has recommendations to clarify the requirements in the Draft Resolution as discussed below.

II. DISCUSSION

A. The Draft Resolution’s Reporting Requirements Should Be Revised.

In the case of a de-energization event, PG&E understands the need to provide status updates to SED in a timely and effective manner throughout the de-energization and restoration processes. However, the Draft Resolution’s requirement that an IOU give
notification to the director of SED within 30 minutes of the restoration of the last customer is not workable given the communications that may need to take place from remote regions and is unlikely to provide SED with meaningful information. PG&E proposes instead that the IOUs provide this update within 12 hours. In the alternative, the IOUs could provide daily updates to SED during an event and the restoration effort.

B. The Draft Resolution’s Reasonableness Review Criteria Should Be Revised.

With regard to the factors listed on page 4 of the Draft Resolution, PG&E appreciates that the existing language references “[o]ther additional factors, as appropriate to assess whether the decision to shut off power is reasonable.” (Draft Resolution at 4.) This “catch-all” factor appropriately recognizes that there may be relevant factors not already identified in D.12-04-024, in part because conditions faced by PG&E and Southern California Edison may be quite different from those faced by SDG&E.

However, the third factor listed in the Draft Resolution requires that an IOU “must reasonably believe that there is an imminent and significant risk that strong winds will topple its power lines onto tinder dry vegetation.” (Id. at 4 (emphasis added).) This factor does not recognize the risk that winds could cause vegetation-related impacts on power lines. PG&E recommends that this factor be modified or another factor be added to address the risk of wind blowing vegetation or other debris.

C. The Draft Resolution’s Public Outreach, Notification, and Mitigation Requirements Should Be Clarified.

PG&E recognizes the importance of public awareness and input, especially on a process as critical as de-energization. To date PG&E has conducted more than 80 outreach meetings with public officials in communities most threatened by wildfire in our service territory, and we will continue to meet with these and other local stakeholders. The Draft Resolution’s direction to meet in person with affected local communities “in anticipation of a de-energization event” appears to require that IOUs conduct in-person meetings with communities between the time that extreme weather is forecasted and the time at which facilities are de-energized, if practicable. While PG&E plans to communicate with communities during these events, in-person meetings are unlikely given the scale of possible events.

With regard to mitigation, the Draft Resolution states that “[t]he IOU shall ensure that critical facilities such as hospitals, emergency centers, fire departments, and water plants, are aware of the planned de-energization and shall offer to provide them with available generators or batteries if they do not have adequate existing backup power resources.” Many of these critical facilities are already required to have their own back-up power resources. Providing backup generators raises many issues, such as overall
cost, cost responsibility, ongoing maintenance, liability and permitting, among others. PG&E recommends that such a program not be required through this Resolution and instead should be evaluated in a different forum.

III. CONCLUSION

PG&E appreciates the Commission’s consideration of its comments and its efforts to help ensure public safety during extreme wildfire risk.

Sincerely,

______________________________
Meredith Allen
Senior Director, Regulatory Relations

cc: Lana Tran, SED
Service Lists for Draft Resolution ESRB-8
CERTIFICATE OF SERVICE

I certify that I have by electronic and/or U.S. mail on this day served a true copy of,

“Comments of Pacific Gas and Electric Company on Draft Resolution ESRB-8” on all parties

in these filings or their attorneys as shown on the attached list.

Executed on June 28, 2018 at San Francisco, California.

/s/ Tauvela U’u

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