

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking
to Examine Electric Utility
De-Energization of Power
Lines in Dangerous Conditions

Rulemaking 18-12-005

**COMMENTS OF THE LOCAL GOVERNMENT SUSTAINABLE ENERGY
COALITION ON PROPOSED ADDITIONAL AND MODIFIED DE-ENERGIZATION
GUIDELINES**

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For THE LOCAL GOVERNMENT
SUSTAINABLE ENERGY COALITION

February 19, 2020

The Local Government Sustainable Energy Coalition (LGSEC) is pleased to submit the following Comments in response to the *Administrative Law Judge's Ruling Requesting Comments on Proposed Additional and Modified De-Energization Guidelines*. LGSEC members include municipalities, regional energy networks (RENs), community choice aggregators (CCA), school districts and civically engaged nonprofits. The Coalition represents 14 cities and 23 counties, which have jurisdiction over almost three-quarters of California's population and reflect two-thirds of the state's electricity demand. LGSEC membership extends to 76 of California's State Assembly districts; 36 of 40 State Senate districts.

LGSEC appreciates the California Public Utilities Commission's (CPUC) efforts to improve the way in which de-energization events are managed by the investor-owned utilities (IOUs). As stated in our comments in the Microgrid proceeding,¹ local governments (LGs) are at the crossroads of the State's efforts to reduce greenhouse gas emissions, adapt to climate change impacts, natural disasters, emergency response and prepare for and respond to PSPS events. As a result, IOUs' relationship with LGs needs to morph from one in which the utilities conduct "outreach" to multiple "stakeholders" to one that fully respects and engages local government knowledge of their residents, facilities, networks and emergency services responsibilities.

While LGSEC strongly endorses the Commission's efforts to improve the IOUs' approaches to developing PSPS plans, Community Resource Centers (CRC), and communication protocols, we are concerned that the draft guidelines lack specific metrics to measure performance and process; that existing resources which could be leveraged have not been identified as part of the planning process; and that while the IOUs will likely request and receive

¹ *Formal Comments of the Local Government Sustainable Energy Coalition on Investor-Owned Utilities' and Staff Resiliency Proposals*, Rulemaking 19-09-009, January 30, 2020.

significant monies to implement final guidelines, no funding is contemplated for LGs and other stakeholders who are being relied upon to make the strategies a success.

LGSEC would like to highlight the existing infrastructure and networks that both the CPUC and LGs have cultivated around energy policy and regional decision-making that can be leveraged to implement these protocols. However, LGs need additional resources to be able to effectively plan for and engage in de-energization efforts as LG's are the ones that need to prepare for sheltering of residents if a PSPS event moves to a fire event. This is particularly true for LGs that are still recovering from the financial and economic costs triggered by past wildfires and PSPS events.²

In this context, LGSEC recommends that the Commission include the following elements in the guidelines.

(1) **Working groups and advisory boards.** The CPUC should determine an appropriate threshold for representative participation of relevant stakeholders. Without such a metric there is significant risk that rural, hard-to-reach, low-income, non-English speaking, functional access needs and medical baseline customers will be under-represented in these forums. LGs have extensive community networks and entities with operating boards and committees that are already have regional decision-making authority. These consist of, but are not limited to, regional climate collaboratives, RENs, CCAs, and Councils of Governments. However, not all entities and their members are prepared or equipped to

² LGSEC believes that the public purpose charges that fund energy efficiency programs should be reformed to encompass climate and energy resilience, mitigation and adaptation. Initiatives such as Southern California Energy Company's Clean Energy Optimization Pilot demonstrate how LG creativity and resourcefulness can be unleashed to develop comprehensive projects that reduce greenhouse gas emissions and enhance energy resilience. In this vein LGSEC encourages the Commission and other stakeholders to support necessary legislative changes to repurpose these funds.

engage in these technical matters on a regular basis. This should be considered an opportunity to engage, educate and empower LGs to taking on greater roles in energy planning and resilience.³ Since the IOU protocols rely so heavily on non-IOU participation, the CPUC should fund and direct a non-IOU to inventory existing institutions that can serve as or participate in working groups and advisory boards. Such an approach would avoid the need to create new structures that could further tax LGs' capacity to effectively engage.

- (2) **The California Energy Efficiency Coordinating Committee (CAEECC).** The CPUC should establish a group similar to CAEECC to guide, advise and organize PSPS protocol implementation and energy resiliency efforts across the State with regional partners. To enable stakeholders to fully engage in these essential efforts, reasonable stipends and travel budgets should be attached to participation. Likewise, to the extent LGs host these groups, their expenses, including for facilitation, should be compensated.
- (3) **The Statewide Energy Efficiency Collaborative (SEEC).** SEEC provides a vital space and resource for LGs to learn and support one another in implementing climate action plans and energy projects. The CPUC should expand SEEC's portfolio to include energy resilience, to address climate mitigation and adaptation through energy policies, programs and projects. LGSEC recommends the CPUC contract a non-IOU entity to develop and implement such a post-SEEC program.
- (4) **Community Resource Centers (CRCs).** LGSEC supports the concept of CRCs but notes that efforts are already underway by LGs, including CCAs, to identify and develop resilient energy systems to support community facilities. Some LGs may be willing to provide

³ In the microgrid proceeding LGSEC noted that it is available to serve as a fiscal sponsor or lead organization to help develop a network platform, which is estimated to cost \$.5 million.

matching funds to develop and install resiliency measures at CRCs. In this respect, the IOUs should look to LGs before any other entities in terms of CRC contracts, as well as part of microgrid development initiatives. CRCs and microgrids should largely be selected and designed by LGs, with support from the IOUs, rather than the other way around. In this respect, the CPUC should direct the IOUs to fund projects that are in development stages and provide direct technical assistance for projects that are in pre-development. In contrast to the evaluation criteria for the IOU-developed microgrids, the LG perspective is needed to maximize critical municipal operations, rather than the number of meters behind a substation. Additionally, all CRCs should not result in increased greenhouse gas emissions in operation, when feasible.

(5) **Transportation resilience.** LGSEC recommends including traffic signals and public transportation within the Ground transportation category to ensure that electric bus operations are fully accessible during wildfires and PSPS events. Additionally, the Commission may want to consider the intersection of PSPS with R.18-12-006 and the Transportation Electrification Framework (TEF) and subsequent plans (TEP) being considered in Q1 and Q2 of 2020. LGSEC endorses the provision of mobile fast charging stations; however fossil fuel generation should be avoided as much as possible.

(6) **Water resilience.** LGSEC recommends explicitly including water resilience in the guidelines, as public agencies and private property owners – some of whom installed water systems for fire protection – were unable to pump water during PSPS events. Management of potential PSPS impacts on water infrastructure and supplies should be reflected in de-energization planning.

(7) **Transparency.** Transparency is critically important to effectively manage PSPS protocols and events. To increase clarity, the CPUC should require the IOUs to undertake a survey of LGs at the end of each wildfire/PSPS season, and publish an associated annual report distributed to customers and key stakeholders. LGSEC also recommends that the CPUC direct the IOUs to provide data and analyses developed through PSPS protocols to the forthcoming California's Analysis Tool for Locational Energy system (CATALENA).⁴ It is critical that LGs have access to information about the basic elements of the grid impacts of PSPS. For example, LGs would need to know what municipal assets are connected to a substation and a range of probabilities that they will receive power at any given hour of the year. The current IOU grid maps (DERiM, DRPEP, etc) do not currently have this information accessible. Furthermore the availability of these maps needs to be reliable, as these resources have become inaccessible during recent catastrophic events.

(8) **Skilled workforce.** The Commission should authorize the IOUs to fund LG-hired or contracted dedicated resiliency officers, as LGSEC recommended in the Microgrid proceeding. Such a strategy would enable the State to take advantage of “stranded talent” created by downsizing of Local Government Partnerships and energy efficiency funding by repurposing these assets towards wildfire and PSPS management and communication.

LGSEC appreciates this opportunity to provide these Comments to the Commission. We look forward to continuing to productively engage in these issues.

Respectfully submitted,

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⁴ This tool should incorporate all important information under one system, including identification of CRCs, vulnerable communities and customers, wildfire and PSPS areas, distributed energy resources program uptake, electric vehicle charging stations and the like.