

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

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

Steven Moss
Partner, M.Cubed
296 Liberty Street
San Francisco, California 94114
415.643.9578; steven@moss.net

For THE LOCAL GOVERNMENT
SUSTAINABLE ENERGY COALITION

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More than three dozen comments were submitted in response to the *Administrative Law Judge's Ruling Requesting Comments on Proposed Additional and Modified De-Energization Guidelines*, including from the investor-owned utilities (IOUs). Collectively, the comments asserted widely divergent opinions about the proper content and update frequency of IOU de-energization mitigation efforts, the appropriation location and operational characteristics of Community Resource Centers, which mix of stakeholders should be included in what types of working groups, and whether they should meet monthly or quarterly, and many other keenly important but largely administrative issues.

Many of the comments are quite cogent. However, in some cases – particularly related to how best to proceed with stakeholder-IOU relations and information-sharing, as principally embodied in working groups – it is difficult to see the basis upon which the California Public Utilities Commission (CPUC) should systematically support one side or another. These are not so much empirical debates as managerial ones, that involve trade-offs between time, money, and the essential imperative to protect the public good.

The fact that the entire utility apparatus being debated as the result of an IOU's decision to de-energize, calls into question why those same IOUs should have any input at all into how to respond to the resulting public health and safety risks and economic and community dislocations. While de-energization may be a necessary act, the cascading set of events fall into the public realm. IOU shareholders should arguably bear financial responsibility for these activities.

This context reinforces the value of the recommendations reflected in the Local Government Sustainable Energy Coalition (LGSEC) Comments. Specifically, rather than rendering final decisions on the full array of managerial issues in this case, the CPUC should create proper pathways to effectively achieve these goals as long as they are needed. This should

include funding and directing a non-IOU to inventory existing institutions that can serve as or participate in working groups and advisory boards; and establishing a group similar to California Energy Efficiency Coordinating Committee to guide, advise and organize Public Safety Power Shutoff (PSPS) protocol implementation and energy resiliency efforts across the State with regional partners.

In addition, LGSEC shares the Rural County Representatives of California's concerns about the polluting air emission consequences associated with deployment of fossil-fueled powered backup generators (BUGs). As discussed in LGSEC's Formal Comments in the Microgrid proceeding,¹ even before widespread use of PSPS as a wildfire risk management tool, the state's BUG population had grown to represent a kind of shadow, or secondary, grid. In mid-2019 there were almost four gigawatts of BUG capacity in the San Francisco Bay Area alone. This volume has increased steadily over the past two years, including as part of residential and backyard generator installations. The resulting emissions, associated with testing alone, as well as the possibility to clean these generators up and redeploy them for the wider public good should no longer be ignored by the CPUC.

In this context, as previously recommended by LGSEC,² the CPUC should direct the IOUs to undertake a census of existing resiliency assets and launch pilot programs in each service territory that focus on cleaning-up and activating these resources for the public good.

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

¹ Rulemaking 19-09-009.

² FORMAL COMMENTS OF THE LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION ON INVESTOR-OWNED UTILITIES' AND STAFF RESILIENCY PROPOSALS, January 30, Page 11.

Respectfully submitted,

By: /s/ Steven Moss
Steven Moss
Partner, M. Cubed
296 Liberty Street
San Francisco, California 94114
415.643.9578; steven@moss.net

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