

**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
(Issued December 19, 2018)

**COMMENTS OF THE LOCAL GOVERNMENT SUSTAINABLE
ENERGY COALITION ON THE SCOPE OF ISSUES AND SCHEDULE**

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For the Local Government Sustainable
Energy Coalition (LGSEC)

Dated: February 8, 2019

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Pursuant to the January 25, 2019 Administrative Law Judge’s Ruling Providing Guidance on Comments to Order Instituting Rulemaking (Ruling), the Local Government Sustainable Energy Coalition (LGSEC)¹ timely submits these comments on the proposed scope of this proceeding. The Order Instituting Rulemaking issued December 19, 2018 (OIR) outlined a broad range of issues to be addressed.² The Commission rightly determined that a comprehensive examination of preemptive electric outages as a disaster mitigation strategy is required to fulfill a number of CPUC mandates, most recently those outlined in SB901. LGSEC is fully supportive of the breadth and scope of this proceeding targeting the broad range of issues and impacts resulting from de-energization of power lines. While the investor-owned utilities (IOUs) have had the authority to implement Public Safety Power Shut-offs

¹ The LGSEC is a statewide membership organization of cities, counties, associations and councils of government, special districts, and non-profit organizations that support government entities. These Comments were approved by the LGSEC’s Board. Individual members may have different views on elements of these Comments. A list of LGSEC’s members can be found at www.lgsec.org. LGSEC is a program of the Local Government Commission (LGC). The LGC is a 35-year old non-profit organization supporting local government leadership in land use, energy and water sustainability.

² *Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Condition* (December 19, 2018). R.18-12-005, pp.8-10.

(PSPS) in the past, these occurrences historically have been rare and for short duration. The frequency and duration of outages has changed dramatically in just the past two years. The Commission has already heard from local government emergency officials, first responders, community members and local government energy leaders on the significant impact this strategy has already had in communities throughout the state. This proceeding should address the full range of public safety, health and welfare concerns as well as safe, reliable and affordable electric service issues. In this context, the broad scope set forth in the OIR's Scoping Memo is both appropriate and necessary if some additional issues proposed below are included.

LGSEC attended both of the California Public Utilities Commission (CPUC or Commission) workshops on PSPS policies held on December 14, 2018 and January 9, 2019 as part of this proceeding. The Commission heard extensive comments from local government Office of Emergency Services officials on best practices, coordination, planning, communication, notification and outage implementation issues highlighting the successes and challenges currently faced both prior to and following implementation of the new statewide PSPS policy.³ These participants have emphasized numerous ways in which planned, voluntary outages have strained existing local government and community emergency preparedness and response resources.

LGSEC is also an active or informational party in the many related rulemaking proceedings regarding Wildfire Mitigation Plans, Emergency and Disaster Preparedness Plans, Climate Adaptation, among others.⁴ None of these proceedings has focused on the

³ ESRB-8, Resolution Extending De-Energization Reasonableness, Notification, Mitigation and Reporting Requirements in Decision 12-04-024 to All Electric Investor Owned Utilities (July 16, 2018).

⁴ See R.18-10-007, *Order Instituting Rulemaking Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901* (2018), R.18-04-019, *Order Instituting Rulemaking to Consider Strategies and Guidance for*

direct linkage between increased local energy resilience through distributed energy resource deployment, undergrounding of facilities, zero net energy building and other potential alternatives, especially in high disaster risk areas, in addition to or instead of de-energization of power lines. Accordingly, LGSEC proposes that the scope in this proceeding include specific focus on key areas already raised in earlier workshops but not explicitly targeted within the OIR's Scoping memo:

- 1) What are the costs to local governments, first responders, customers and specifically vulnerable customer populations of a PSPS event and how does it change in relationship to the duration of the outage?
- 2) What are the costs to the utilities of the PSPS policy and individual events in particular?
- 3) What impact does PSPS have on existing back-up power resources of local governments, essential public services, critical infrastructure and customers?
- 4) What back-up power resources and protocols are now needed to respond to PSPS events and which of those resources should be provided by the utilities?
- 5) What local, distribution system and integrated distributed energy resource strategies and investments that provide greater adaptation and resilience are available as alternatives to PSPS or to lessen the need for PSPS?
- 6) What utility cost responsibility for customer losses due to PSPS events should the Commission impose on the electric utilities?
- 7) What reasonable utility standards should the Commission adopt in order to address the need for the following information:
 - a. Timing of advance notification of outages;
 - b. Information on power restoration;
 - c. Accurate and timely summary of customers affected.

In addition, LGSEC requests that the formal record in this proceeding include the information gathered during the two workshops that have already occurred. Staff Reports

Climate Change Adaptation; R. 15-05-006, Order Instituting Rulemaking to Develop and Adopt Fire-Threat Maps and Fire-Safety Regulations; R. R.15-06-009, Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Regulation of Physical Security for the Electric Supply Facilities of Electrical Corporations Consistent with Public Utilities Code Section 364 and to Establish Standards for Disaster and Emergency Preparedness Plans for Electrical Corporations and Regulated Water Companies Pursuant to Public utilities Code Section 768.6.

with any written materials provided by the participants should issue with an opportunity for parties to comment. These steps would well serve the need for a complete record in this proceeding.

Accordingly, for all the foregoing reasons, LGSEC respectfully requests that the Scoping Memo issued in the OIR be augmented to include the additional issues identified aboveherein.

Respectfully submitted,



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