



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

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Rulemaking 18-10-007
(Issued October 25, 2018)

**EAST BAY MUNICIPAL UTILITY DISTRICT COMMENTS
ON WILDFIRE MITIGATION PLAN OF PACIFIC GAS AND ELECTRIC COMPANY**

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In accordance with the December 7, 2018 Assigned Commissioner’s Scoping Memo and Ruling, instructions of the Administrative Law Judge, and the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, East Bay Municipal Utility District (“EBMUD”) submits comments on Pacific Gas and Electric Company’s Wildfire Mitigation Plan.

Introduction

EBMUD appreciates this opportunity to provide initial comments on the wildfire mitigation plan (“WMP”) filed on February 6, 2019 by Pacific Gas and Electric Company (“PG&E”). As directed in ALJ Semcer’s March 5, 2019 ruling, the following comments are organized consistent with the common outline agreed to between the parties. EBMUD’s comments exclusively relate to the draft Pacific Gas and Electric Company Wildfire Mitigation Plan (“PG&E WMP”), and all page citations are to the PG&E WMP.

1. Meaning of Plan Approval

No comments.

2. Overall Objectives and Strategies

No comments.

3. Risk Analysis and Risk Drivers

No comments.

4. Wildfire Prevention Strategy and Programs

Section 4.5 Enhanced Situational Awareness and Known Local Conditions

This section of the PG&E WMP (pages 86-94) includes specific tools and modeling for situational awareness. In some cases, the information gained through use of these tools and models is communicated internally within PG&E and in some cases, externally. For example, there is discussion of daily meteorological forecasts that are used to communicate fire danger conditions (page 89), weather station data made publicly available in near-real time (page 91), a satellite fire detection system that produces alerts when a new fire is detected (page 92), weather risk dashboard (page 93) and PG&E Wildfire Safety Operations Center (“WSOC”) incident reports (pages 93-94). These references are very general, and do not provide detail regarding whether or how critical situational awareness data will be shared with critical service providers.

EBMUD recommends that this section be revised to:

- Provide specific information regarding how PG&E will provide access to situational awareness data in real time by critical service providers (and others, such as first responders).
- Include specific procedures PG&E will use to notify critical service providers such as water/wastewater utilities through the PG&E WSOC or otherwise of situational awareness information, alerts, incident reports, and risk analysis.

Section 4.6 Public Safety Power Shutoff Program

EBMUD provides comments below on specific subsections of Section 4.6 of the PG&E WMP. However, there is also a need to expand this section to include a description of how wildfire mitigation activities described elsewhere in the PG&E WMP relate to Public Safety Power Shutoff (“PSPS”) planning and decision making, and particularly how PG&E intends to reduce the risk, frequency, and impact of PSPS events in the near and longer term.

EBMUD recommends that this section be expanded to include the following:

- Description of how mitigation activities such as inspections, hardening, vegetation management and camera/weather station deployment are expected to reduce the number of circuits that are subject to PSPS events, and minimize the likelihood that PSPS events will be initiated. Describe how the implementation of mitigation measures will reduce risks so that power lines can be operated safely under all anticipated conditions, making de-energization increasingly unnecessary over time, and achieving the ultimate goal of eliminating PSPS events.
- Detailed description of PG&E’s strategy and plans for reducing the number of accounts subject to potential PSPS events. This is essential because for 2019 PG&E identifies “all distribution and transmission lines at all voltages (500 kV and below) that traverse Tier 2 or Tier 3 HFTD areas” as potentially subject to PSPS. (Page 96.) As a result, under the current PG&E WMP any and all of the 5.4 million PG&E customer accounts could be affected by PSPS. This presents an unrealistic and costly scenario for emergency preparations by providers of essential services such as water utilities, including a high level of redundancy in backup power.

Section 4.6.1 PPS Decision Factors

This section identifies six factors that PG&E reviews when determining if power must be turned off for safety. PG&E also summarizes its process for activating its Emergency Operations Center, and monitoring conditions up to the point at which the Officer in Charge decides whether to call for a PPS. EBMUD recommends addition of the following:

- The PPS decision factors (on pages 97-98) do not include consideration of the condition of the transmission and distribution lines and related infrastructure as a factor in determining whether to call a PPS. For example, the list of factors does not require consideration of whether some circuits are hardened and thus better able to withstand the identified high fire risk condition. This should be added to the list of factors. As system hardening and other activities continue, the improvements in

lowered risk on a specific circuit should be accounted for in the decision whether to de-energize that circuit under the PSPS protocol.

- The description of PSPS decision making procedures should include discussion of how de-energization will be sequenced, and how and when sequencing decisions will be made. For example, will de-energization begin with Tier 3 High Fire-Threat District (“HFTD”) areas first and then move to Tier 2 areas, or will the initial de-energization be over a broad area? This information will greatly impact the mitigation plans developed by providers of critical services.

Section 4.6.2.3 Customer Services and Programs

This section describes current customer services and programs, and proposed new initiatives PG&E is exploring for 2019 and beyond. (Pages 100-105.) PG&E states that it will build on how it provides support for critical services and “provide timely updates and information regarding PSPS event impacts, duration and restoration status.” (Page 104.)

EBMUD appreciates that PG&E has recognized water agencies as critical service providers, and that it intends to prioritize communications with critical service providers. However, the brief and very general statements in this section are not adequate to provide a basis upon which the Commission could determine the adequacy of PG&E’s plan to mitigate impacts of PSPS through interaction with critical service providers. More description and detail are needed.

EBMUD specifically recommends that:

- This section should designate wastewater as well as water agencies as critical service providers.
- This section should describe in more detail how PG&E will improve and “build on” its partnership with critical services (page 100). PG&E should define and specify how it will provide “live support” and “timely updates and information” and describe how and when these crucial activities will be accomplished.

Section 4.6.3 PSPS Notification Strategies

The PG&E WMP states that “When and where possible, PG&E will attempt to notify critical facilities such as hospitals, emergency centers, fire departments, water plants, water utilities/agencies, schools, and telecommunications providers (critical facilities).” (Page 105.) PG&E will provide “frequent communication” with critical facilities during an event “if possible,” and prioritize critical facilities during restoration when and where technically possible. (Pages 105-106.) This section lacks specificity, and does not explain how the “critical facilities” described here relate to the “priority essential service” providers listed in Attachment B.

EBMUD specifically recommends that:

- This section should clarify what is meant by “critical facilities” and adopt a more standardized way of identifying and referring to critical facilities and critical service providers.
- The qualification “if possible” without more explanation raises concerns regarding whether critical service providers can assume that PG&E has made necessary arrangements and developed a protocol that will ensure effective communication with critical service providers prior to, during and after a PSPS event. With the understanding that there is always a possibility that pre-established protocols may not work in emergency situations, the notification procedures should be robust enough to enable planning and preparation by critical service providers.
- This section should include discussion of how PSPS will be aligned with the California Standardized Emergency Management System (“SEMS”) and National Incident Management System (“NIMS”) processes.

Section 4.6.3.2 Mitigating PSPS Impacts on First Responders, Health Care Facilities, Telecommunications, and Water Utilities

The PG&E activities described in this section will help ensure that communications between PG&E and critical service providers are in place, and can be called upon when a PSPS

event occurs. (Pages 108-109.) Sectionalizing will be an important tool for minimizing impacts on critical water facilities, and planning in this regard should be coordinated with water utilities.

EBMUD specifically recommends that:

- Attachment B, which is referenced in this section, should provide a “complete listing of which entities the electrical corporation considers to be priority essential services” as required by the January 17, 2019 ALJ Ruling. It should list all priority essential service providers by category and name. (See, for example, the SDG&E WMP, Appendix G.) This level of detail will enable service providers to verify that they are on the list and communicate with the utility regarding communication information and preferences. It will also enable the Commission to establish consistency and monitor performance. East Bay Municipal Utility District should be listed under both the Water Utility and Wastewater Utility categories. Essential service accounts should include water pumping stations, drinking water reservoirs, and other related facilities for the treatment and distribution of potable water or collection and treatment of wastewater.
- This section should include discussion on how maps of potential PSPS circuits will be provided to critical service providers to aid in planning.
- This section should provide for PG&E to establish a “likelihood of PSPS” estimate for each critical facility account to help in planning need for backup generators, etc.

Section 4.6.4 Re-energization Strategy

This section addresses re-energization in very general terms and lacks details necessary to understand how prioritization of services will be determined during re-energization. (Page 109.)

EBMUD specifically recommends that:

- PG&E should provide factors that will be considered in determining the order of restoration of service. Factors should include restoration to essential services such as water utilities. The restoration of power to critical services accounts should drive prioritization and also inform the installation of sectionalizing devices so that power can be rapidly restored to high priority accounts after a PSPS event.

Section 4.8.2 Restoration

This section provides a very general description of PG&E’s internal process for restoration activities, but does not provide actionable information that critical service providers can use for planning. (Page 114.) EBMUD specifically recommends:

- This section should include coordination and communication between PG&E’s Incident Command Structure (“ICS”) team, local agencies, operations areas, and critical customers in developing restoration plans. In addition, the Company Emergency Response Plan (“CERP”) should document this process.

5. Emergency Preparedness, Outreach and Response

Section 5.1 PG&E Company Emergency Response Plan

This section describes PG&E’s Company Emergency Response Plan. (Page 117.) It would be useful to provide a link to the plan and describe how it is kept up to date. In addition:

- This section should include discussion of how PG&E will align with SEMS and NIMS during PSPS events.
- This section should specify that all critical service providers will have a direct contact with PG&E within the Emergency Operations Team structure.

6. Performance Metrics and Monitoring

Section 6.2 Plan Performance and Evaluation

This section (pages 131-136) should include metrics to measure frequency, effectiveness and impacts of PSPS events. These metrics should include:

- Number of PSPS events.
- Number of customer accounts affected.
- Time for restoration of service for 25%/50%/75% and 100% of all affected accounts for each PSPS event.
- Annual reduction in number of customer accounts that are subject to PSPS.

7. Recommendations for Future WMPs

In order to ensure coordination between the updating of this WMP and the outcome of the Commission’s De-Energization Rulemaking (R.18-12-005) process, EBMUD recommends:

- This WMP should describe the mechanism that will allow the protocols approved in the De-Energization Rulemaking to be included in future WMPs.
- Future WMPs should include the recommendations from the De-Energization Rulemaking.

8. Other Issues

No comments

Dated: March 13, 2019

Respectfully submitted,

By: _____/s/_____

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