

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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

R.18-12-005

**COMMENTS OF THE
WESTERN STATES PETROLEUM ASSOCIATION
ON THE PROPOSED DECISION OF PRESIDENT PICKER
ADOPTING DE-ENERGIZATION (PUBLIC SAFETY POWER
SHUT-OFF) GUIDELINES (PHASE 1 GUIDELINES)**

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SUBJECT INDEX OF PROPOSED CHANGES

The Western States Petroleum Association (WSPA) seeks evaluation and modification of the proposed decision (PD) of President Picker issued April 26, 2019 entitled Decision Adopting De-Energization (Public Safety Power Shut-Off) Guidelines (Phase 1 Guidelines).

WSPA seeks: (a) clarification of the definition of critical infrastructure facilities under the decision to include designated WSPA operations; (b) a recognition that de-energization actions must be balanced against other safety concerns related to the de-energization of critical infrastructure facilities; (c) obligations for utility actions that cause consequential harm to critical infrastructure facilities for flawed advance notice under the de-energization scheme; (d) recognition that the risk of costs and reliability for industrial customers presents financial risks and harm to the grid by disconnection of industrial loads; and (e) questions the role of the Commission as both safety and economic regulator of the investor-owned utilities.

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The Western States Petroleum Association (WSPA) provides these comments pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission. WSPA received party status via Administrative Law Judge Semcer's ruling on May 6, 2019.

WSPA's comments address the factual, legal and technical errors in President Picker's proposed decision (PD) issued April 26, 2019 entitled *Decision Adopting De-Energization (Public Safety Power Shut-Off) Guidelines (Phase 1 Guidelines)*.

I. INTRODUCTION AND SUMMARY OF WSPA'S POSITIONS

The Western States Petroleum Association¹ is a non-profit trade association that represents companies that account for the bulk of petroleum

¹ WSPA member companies on whose behalf this motion is filed are: Aera Energy LLC, BP America, California Resources Corporation, Chevron U.S.A. Inc., ConocoPhillips, ExxonMobil Corporation, Marathon Petroleum Corporation, PBF Energy, Phillips 66 Company, Plains All American Pipelines, L.P., Santa Maria Energy, LLC, Shell Oil Products, U.S. Oil and Refining Company, and Valero Energy Corporation.

exploration, production, refining, transportation and marketing in the five western states of Arizona, California, Nevada, Oregon, and Washington. In California, WSPA companies are major industrial ratepayers with material interests in the regulation of the electric grid, the electric market, and the affordability and reasonableness of rates. Many WSPA facilities are formally designated critical infrastructure operations that depend upon grid systems for reliability and sustained operations in emergency conditions.

The implementation of Senate Bill 901 is of particular interest to WSPA. The association was active in all facets of the legislative debate over critical features of the bill, including measures related to de-energization. WSPA expects to address matters affecting transmission level customers, and the procedures for defining and treating critical infrastructure facilities. Many of WSPA's facilities are Category N resources that present compelling issues for any termination of service and for orderly shutdown of operations.

As articulated by the March 25, 2019 opening comments from other industrial customer interests, the Commission Decision 01-06-085 established protocols for de-energization events. As a result of the 2001 energy crisis, and the administration of rotating utility service outages, the Commission recognized certain "essential customer" exemptions. One set of those exempt customers, Category N customers, was petroleum refineries, WSPA operations, and California critical infrastructure facilities.

It is axiomatic that refineries cannot function without the associated electrification of production operations, pipeline operations for the transport of

fuel stock, and refined product (e.g., jet fuel). All of these integrated production, refining and delivery systems are critical infrastructure facilities. For the purposes of these comments, the critical facilities are all of these operations, not solely petroleum refineries.

Inexplicably, the PD fails to expressly recognize Category N customers as warranting and requiring specific protocols and treatment in the event of a de-energization event. WSPA's comments seek to remedy this error, and to identify additional consequences of de-energization of critical infrastructure facilities for the Commission and other decision makers to consider.

II. FACTUAL, LEGAL AND TECHNICAL ERRORS

A. FAILURES OF THE PROPOSED DECISION RELATIVE TO INDUSTRIAL OPERATIONS AND CRITICAL INFRASTRUCTURE FACILITIES

WSPA joins in the comments of other industrial customers raising concerns with the potential for uncontrolled de-energization of critical infrastructure facilities relying on the electric distribution and transmission system. The current Commission should carefully consider the key observations and conclusions related to the de-energization of petroleum refineries reflected in Decision 01-06-085, where that Commission:

- recognized the critical nature of petroleum refineries in particular, and designated these electricity customers as “*essential customers*,” exempting them from rotating utility outages.
- observed “[a]n *electricity curtailment lasting only a minute at a petroleum refinery can result in a total shutdown of the refinery for up to three weeks.*”
- Appreciated that the “*loss of production from a single refinery for several weeks can result in a dramatic drop in fuel inventories in California, and substantial price increase.*”

- ordered the utilities to coordinate electricity interruptions to these customers to “*minimize disruptions to public health and safety...*”, and
- noted that “[t]*ransportation fuels are critical to public health and safety, particularly law enforcement, medical care responders, and the military.*”

While it is conceivable that the PD fully intends to embrace Category N customers, particularly petroleum refineries, petroleum production, fuel transportation pipeline operations, and other related operations as “critical facilities”, that conclusion is not apparent. The PD warrants clarification in this regard.

**B. THE COMMISSION’S PUBLIC SAFETY PRINCIPLE
REQUIRES BALANCE BETWEEN DE-ENERGIZATION
PROTECTIONS AND DE-ENERGIZATION
CONSEQUENCES**

WSPA, like all California stakeholders, is concerned with public safety issues related to wildfire mitigation efforts, and recognizes that de-energization has a place in those protective efforts. However, there are major public health and safety consequences from inadequate or untimely advance notice of de-energization to a petroleum refinery.

An uncontrolled shut-down of a refinery from a de-energization action would result in immediate emergency load shedding, flaring and a heightened risk of a catastrophic event. In addition to these safety consequences, the resulting impact on significant transportation and emergency fuel reductions (e.g., jet fuel for air travel, emergency vehicle fueling, back-up generation systems, etc.) would exacerbate the emergency conditions. The “medicine” of de-energization should not result in more harm to safety interests trying to cure

wildfire liability risks by failing to retain safe operation or shut-down of critical facilities.

Balancing safety measures is essential. If uncontrolled de-energization creates risks or harms greater than the reasonable risk of ignition in vulnerable areas, we have an unbalanced and unreasonable safety standard. The state is on a path to expending billions of dollars on wildfire prevention or control, and de-energization may be a necessary tool in those prevention measures. However, de-energization in certain instances may cause more harm than less, and must be carefully and prudently implemented with respect to critical facilities.

The PD appears to ignore these safety consequences in the consideration of needed, timely advance notice, in all circumstances, to Category N, petroleum refinery resources, and related WSPA critical infrastructure facilities. This failure in the PD warrants correction.

C. WSPA OPERATIONS DEMONSTRABLY PRIORITIZE FACILITY PROPERTY FIRE MANAGEMENT AND CONTROL

Safety in operations and reliability of production are hallmarks of WSPA facility operations. These facilities proactively safeguard their facilities through active land management, equipment maintenance, and, in many cases, with their own private fire departments. The facilities oversight by multiple safety agencies – local, state and federal – is pervasive. These facilities, in contrast to what the investor-owned utilities have shown, are not to blame in causing or contributing to wildfires.

Yet this PD, establishing a de-energization scheme that may well include the de-energization of transmission lines that serve these high voltage customers, will bear the consequences of utility de-energization choices. Placing these customers at risk of sustained, safe operation that relies upon highly reliable electric service is an unwarranted penalty fostered by this PD.

These facilities are neither the cause of, nor do they present a risk of, wildfire ignition, but they are going to bear the costs of de-energization under this PD. These costs could be exponentially higher if the risk of reliable service is subject to transmission line de-energization. Transmission lines typically have at least a portion of their easements run through remote, wooded areas.

Transmission lines running into industrial load centers will unquestionably pass through fire zones, but their de-energization will have impacts far and wide for grid customers dependent upon the electric service they provide. Again, if the consequences of the “solution” create greater harms, the PD fails to provide balanced solutions considering these implications.

D. THE FAIRNESS OF EMISSION, PERMIT OR DISCHARGE PENALTIES CAUSED BY DE-ENERGIZATION

The PD does not recognize the consequences of de-energization to a petroleum refinery or other identified critical infrastructure facilities. Take as an example the failure of a utility to provide electric service to a petroleum refinery that causes an uncontrolled emergency shut-down. Beyond safety concerns, there are material, costly consequences. Who bears the costs of permit violations, agency penalties, emission violations, and agency oversight? Who

bears the costs of damaged equipment and loss of operations as a direct result of the shut-down and the facility restart?

WSPA facilities, the Valero Refinery in Benicia, and the PBF Torrance Refinery have recently experienced the consequences of a utility failure in service. In Valero's instance, the failure was caused by negligent utility maintenance. In the PBF case, the failure was the utility facilities for interconnection. Virtually all consequential losses created by the utility service failure (uncontrolled emissions, discharge penalties, loss of production, and replacement of damaged equipment) fall upon the customer. De-energization as contemplated by the PD could trigger the very same set of cost consequences, with no responsibility by the utility to assure proper advance notice in all cases for the controlled shut-down of critical infrastructure facilities.

The PD should assure that critical infrastructure facilities receive full advance notice of any de-energization action, and the consequential costs of such actions should be borne by the utility taking a de-energization action.

E. A DIRECT AND ILL-CONCEIVED CONSEQUENCE OF THE DE-ENERGIZATION PD IS FOR INDUSTRIAL CUSTOMERS TO ABANDON THE GRID

What message does this PD send to industrial customers about the reliability of the grid, and the benefits of remaining connected to the grid? The PD provides aspirational hopes for the de-energizing utility to provide adequate notice to critical infrastructure customers. But the PD bluntly states in its findings: *There may be times when advanced notification of a de-energization event is not possible.*

This message is shocking. For an industrial customer that relies on secure and constant electric service, the PD offers no assurances other than hoped-for advanced notice of a de-energization event. This message tells any customer that if they want to secure reliable service, they should provide their own onsite generation. Staying connected to the grid, given wildfire liabilities, may be financially untenable. Staying connected to the grid to assure reliable service is no longer a viable option. The threat of de-energization, particularly uncontrolled implications of transmission line shut-downs, presents a tipping point for grid connection.

The PD provides additional impetus for industrial customers to depart the system and island electric demand to meet their own reliability concerns, as well as eliminating foreseeable wildfire driven rate increases. This financial death spiral is an issue that should be at the forefront of the Commission's concerns. It will have consequences on the ability of the state to support climate change initiatives as customers seek both financial and reliability options. This PD needs evaluation in the context of these looming concerns.

F. THE CPUC SHOULD NOT SERVE AS BOTH AN ECONOMIC AND SAFETY REGULATOR FOR UTILITIES

It is rather simple to take a jaundiced view of the PD as granting unbridled discretion to the electric utilities to take pre-emptive de-energization actions for a single purpose – to eliminate utility wildfire liabilities in the guise of safety. These are the same utilities that the Commission is challenging as failing to sustain a proper safety culture, and for good reason. Moreover, other prevention plans,

costly prevention plans, are being implemented by the utilities as measures with far less adverse risk and impact than de-energization.

In light of the PD's themes and direction, the question again arises:

Is it time to accept that the CPUC is not the correct agency to be both the economic and safety regulator for investor-owned utilities?

This question is not simply one posed by stakeholders. President Picker himself has raised this issue in the context of the oversight evaluation of the future structure and oversight of PG&E.²

The governor's recently proposed budget³ that is subject to legislative review and approval calls for a \$41 million allocation to the CPUC, in part to investigate and verify utility wildfire mitigation plans. Is the CPUC the right agency for these funds? The PD takes note of the Commission's actions to join forces with California Emergency Services and Cal Fire. Rather than "joining forces," should the Commission cede any decision-making on de-energization actions to other safety agencies, like OSHA, California Emergency Services and Cal Fire?

This PD needs to be considered in light of the conflict that the Commission has on the one hand, to protect the economic and financial viability of investor owned utilities, and the competing objective of wildfire prevention and safety. The utilities will no doubt have a standard that suggests using de-energization

² California Public Utilities Commission Public Discussion on Pacific Gas and Electric Forums on Governance, Management, and Safety Culture Part II: Forum on Governance, Management, and Safety Culture, April 26, 2019; see, <http://www.adminmonitor.com/ca/cpuc/workshop/20190426/>.

³ 2019-2020 Budget Proposal, Emergency Response related to wildfires, p. 82-83.

“as a last resort,” but given their discretion to de-energize and avoid claims of wildfire liability, will they under this PD? The answer will come in future fire-season actions. However, the Commission must not grant, and the utilities should not have, unfettered discretion to implement de-energization without bearing the consequential harm to utility customers created by such actions.

III. CONCLUSION

WSPA seeks actions by the Commission to address the de-energization of critical infrastructure facilities represented by WSPA operations, but also to recognize the risk to public safety under the PD. It is certainly true that wildfires present dangers to communities, but so will uncontrolled shut-down of fuel refineries, pipeline transportation and other operations that require time to safely terminate operations. Utilities should be required to bear the consequential costs of their de-energization positions, regardless of the authorizations given by the PD. At the very least, the Commission must support the waiver of any penalties for emission permit violations, or other regulatory violations, triggered by a transmission shut-down of such facilities.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Alcantar", with a long horizontal flourish extending to the right.

Michael Alcantar
Counsel to WSPA

May 16, 2019

Appendix – WSPA Proposed Findings of Fact and Conclusions of Law

Deletion is designated by ~~strikeout~~; addition designated by double underline.

Findings of Fact

1. The 2018 wildfire season in California was the most destructive on record.
2. Electric utility infrastructure can be an ignition source for wildfires.
3. De-energization is the proactive shut-off of power to power lines that may fail in certain weather conditions in order to reduce the likelihood that utility infrastructure can cause or contribute to a wildfire. It is a measure that can be used after the electric investor-owned utility has exhausted all other means to protect against the risk of wildfire ignitions in specific wildfire zones or locations as a result of utility infrastructure.
4. Regional variability in topography, weather, and on-the-ground utility employee assessments impact de-energization decisions.
5. The electric investor-owned utilities serve diverse territories ranging significantly in size and topography.
6. De-energization can have disproportionate impacts on certain populations, and upon critical infrastructure facilities.
7. Adopting standardized definitions and customer designations allows the electric investor-owned utilities, CalOES, CAL FIRE, other state and local government agencies, critical facilities and infrastructure, public safety partners, the Commission, and customers to operate with a shared understanding and language throughout a de-energization event. The lead agencies in undertaking these actions should be CalOES and CAL FIRE in collaboration with the other noted entities.
8. Advanced identification of primary, secondary, and if possible tertiary 24-hour points of contact for public safety partners, critical infrastructure facilities, and primary and secondary 24-hour points of contact for critical facilities and critical

infrastructure, updated annually, is essential to ensure a safe and effective de-energization event.

9. The electric investor-owned utilities cannot identify all AFN populations within their service territories at this time. The electric investor-owned utilities can identify all critical infrastructure facilities and contacts within their service territories at this time.

10. Partnering with local governments and agencies will help electric investor-owned utilities identify AFN populations within their service territories.

11. It is essential to identify customers dependent upon life-sustaining medical equipment that requires electricity so that the electric investor-owned utilities and public safety partners can assist those customers in advance of and during a de-energization event.

12. Adequate advance notice of a de-energization event allows public safety partners, critical facilities and critical infrastructure, AFN populations and utility customers time to prepare for and respond to a de-energization event.

13. Accurate communication with and notification to first responders/emergency responders, state and local government entities, public safety partners, critical facilities and affected customers within the boundaries of a de-energization event is critical to ensure safe and orderly de-energization.

14. Coordinated responses, including messaging, among electric investor-owned utilities, first responders and emergency responders, public safety partners, critical infrastructure facilities and state and local jurisdictions/governments is necessary required to protect the public safety before, during and after a de-energization event.

15. There are two forms of de-energization notification and communication: (1) education and public outreach in advance of wildfire season to ensure that procedures and processes are in place with public safety partners and that customers are aware of de-energization and know how to prepare; and (2) adequate advance notice and communication of a potential, imminent, or a suddenly occurring de-energization event.

16. Priority notification of public safety partners, critical infrastructure facilities and adjacent jurisdictions that may be impacted by a de-energization event enables those with public safety responsibilities to be adequately prepared.
17. There may be times when advanced notification of a de-energization event is not possible. for some customers, however adequate advance notice is required for any critical infrastructure facility for a de-energization event in order to assure safe, controlled shut down of such facilities for public safety.
18. Adopting an advanced notification timeline, while affording the electric investor-owned utilities limited flexibility to adjust the timeline based upon situational awareness and real-time events, is required to allows public safety partners, critical facilities and critical infrastructure, and affected customers time to prepare for and respond to an imminent de-energization event. In no event will the electric investor-owned utilities limited flexibility contemplated in this finding permit the utilities to fail to provide adequate advance notice prior to a de-energization event for public safety partners and critical infrastructure facilities.
19. The electric investor-owned utilities, as the entities with the most knowledge of and jurisdiction to call a de-energization event, are best situated to provide notification in advance of, during, and after a de-energization event.
20. Local jurisdictions are responsible for notification and communication related to other emergency events that result in a loss of power, such as wildfires.
21. Consequences of de-energization should be treated in a similar manner as any other emergency that results in a loss of power. Provided that consequences for regulatory permit violations, damages to equipment or loss of production for critical infrastructure facilities shall be borne by the responsible electric investor-owned utility if there is a failure of proper, adequate advance notification.
22. Integrating into and leveraging existing state and local emergency outreach and notification systems, such as the California Alert and Warning Guidelines, and developing pre-scripted templates and messages that are Common Alerting Protocol compliant enables a cohesive notification effort and allows local

jurisdictions the ability to provide secondary or supplemental notification and outreach.

23. Public outreach and education in advance of wildfire season is critical to ensure that AFN populations are prepared and know how to respond to a de-energization event or any emergency event that may result in a loss of power.

24. A statewide education campaign will allow citizens to prepare for and obtain information during a prolonged loss of power.

25. Educating public safety partners about the characteristics and thresholds that the utility considers in determining whether to de-energize, such as temperatures, wind speeds, and humidity, enables public safety partners to conduct parallel planning and preparation.

26. Informing public safety partners and critical infrastructure facilities of the boundaries of de-energization event, circuits to be de-energized, information regarding customers within the de-energization boundaries (e.g. medical baseline customers), the estimated start date and time of the de-energization event, the estimated length of the de-energization event and the estimated restoration time, is required and will facilitate a coordinated response to these events and enhance public safety.

27. It is difficult to predict in advance the duration of a de-energization event.

28. Accurate and timely geospatial information that can be rapidly integrated into public safety partners' existing geospatial tools is critical in facilitating decision-making at the state and local levels.

29. Providing customers with information regarding the timing and estimated duration of a de-energization event in a format consistent with the best practices articulated in the California Alert and Warning Guidelines enables customers to sufficiently prepare.

30. The California Alert and Warning Guidelines provide guidance and expectations for jurisdictions throughout California on the tools to use to alert the public to dangerous conditions and warn of emergencies.

31. To be effective, notifications should be delivered in multiple formats via various media, both to increase reliability of warning delivery and to provide a sense of corroboration that will encourage recipients to take protective actions.
32. Some rural areas may lack access to broadband services.
33. During a de-energization event, customers may not have access to communication channels that rely upon electricity, such as broadband services, cellular services, etc.
34. SEMS is a structure for coordination between government and local emergency response organizations. It provides and facilitates the flow of emergency information and resources within and between the organizational levels of on-the-ground responders, local government, operational areas, regions and state management.
35. Advanced provision of GIS data to local jurisdictions, including the location of critical facilities and infrastructure, circuit maps and number of medical baseline customers, will facilitate preparation for future de-energization events.
36. The Incident Command System governs formation and staffing of EOCs.
37. It is possible that a local jurisdiction will not form an EOC for a de-energization event.
38. Requests to delay de-energization currently occur on an ad-hoc basis. Further development of the record is required to adopt standardized de-energization delay parameters.
39. De-energization could exacerbate another subsequent emergency, e.g. if a wildfire ignites in a de-energized area and water infrastructure lacks electricity to provide adequate water services for fire suppression; or uncontrolled emergency shut downs of volatile fuel production facilities presenting greater emergency conditions.
40. To date, de-energization has occurred primarily on the distribution system; transmission-level de-energization may become necessary in the future, but shall not be undertaken absent the establishment of conditions to address of the impacts and measures to address consequences of such actions on critical infrastructure facilities.

41. De-energization of transmission lines may have different and not yet fully understood impacts as compared to de-energization of distribution lines, e.g., shut down of seemingly wildfire remote critical infrastructure facilities.
42. De-energization of transmission lines will require coordination with CAISO, CalOES and CAL FIRE as well as compliance with FERC and NERC reliability standards.
43. Post-de-energization reporting provides transparent information on the de-energization event and facilitates learning by the utilities, public safety partners and the Commission.
44. Wide service of post de-energization event reports will ensure that impacted public safety partners are provided an opportunity to offer feedback on the de-energization event.
45. SED currently reviews post de-energization reports.
46. Adopting the Guidelines in Appendix A furthers the ability of the electric investor-owned utilities, first and emergency responders and public safety partners to operate under a cohesive framework using consistent language.
47. Critical infrastructure facilities shall include, and not be limited to Category N facilities recognized in Decision 01-06-085, and associated petroleum production operations, petroleum and natural gas fuel pipeline and transportation delivery facilities.

Conclusions of Law

1. Pursuant to Pub. Util. Code §§ 451 and 399.2(a), the electric investor-owned utilities have the authority to shut-off electric service in order to protect the public safety, but such authority must be balanced with other consequential public safety harms resulting from such shut-off of electric service.
2. D.12-04-024 adopted reasonableness, public notification, mitigation and reporting requirements for SDG&E in the event that SDG&E initiated de-energization.

3. Resolution ESRB-8 extends the reasonableness, public notification, mitigation and reporting requirements of D.12-04-024 to all electric investor-owned utilities and strengthens reporting, public outreach, notification and mitigation guidelines.
4. It is reasonable to afford the electric investor-owned utilities flexibility in developing and deploying de-energization programs while requiring the use of standardized definitions and nomenclature and requiring operation under a cohesive framework, provided such flexibility does not place critical infrastructure facilities at risk of adverse safety and consequential harm.
5. It is reasonable to adopt a definition for critical facilities and critical infrastructure aligned with the Department of Homeland Security's Critical Infrastructure Sectors, provided that such definition includes Category N facilities recognized in Decision 01-06-085, and associated petroleum production operations, petroleum and natural gas fuel pipeline and transportation delivery facilities.
6. It is reasonable to adopt the definition for AFN populations set forth in Government Code § 8593.3.
7. It is reasonable to adopt definitions for first responders/emergency responders, public safety partners, critical facilities/infrastructure and AFN populations set forth in the Guidelines in Appendix A.
8. It is reasonable to require the electric investor-owned utilities to identify and maintain accurate 24-hour points of contact for public safety partners and critical facilities/infrastructure, updated annually.
9. It is reasonable to require the electric investor-owned utilities to update and expand enrollment in their Medical Baseline programs, to develop a means for customers to self-identify as a member of an AFN population, and to partner with local governments and agencies to identify AFN populations.
10. It is reasonable to require priority notification of a de-energization event to public safety partners, critical infrastructure facilities and adjacent jurisdictions that may lose power as a result of de-energization.
11. The guidelines in Appendix A satisfy the requirements of Pub. Util. Code § 8386(c)(7).

12. It is reasonable to require the electric investor-owned utilities, whenever possible, to provide advanced notification of de-energization events according to the timeline set forth in the Guidelines in Appendix A, provided that adequate advance notice is provided in all instances to public safety partners and critical infrastructure facilities before undertaking a de-energization action that will affect those entities.

13. It is reasonable for the electric investor-owned utilities to retain responsibility for notification and communication of a de-energization event.

14. It is reasonable to require the utilities to integrate into and leverage existing local and state emergency notification systems and for the electric investor-owned utilities to coordinate with public safety partners to provide notification.

15. It is reasonable to require the electric investor-owned utilities to provide to local governments and public safety partners information on the thresholds for strong wind events and conditions that define an “extreme fire hazard” that the utility evaluates in considering whether to de-energize.

16. It is reasonable to require the electric investor-owned utilities to partner with CalOES and CAL FIRE to develop a statewide education campaign that provides education tailored to the needs of stakeholders, including AFN populations.

17. It is reasonable to require the electric investor-owned utilities to provide public safety partners and critical infrastructure facilities with the boundaries of a de-energization event, circuits to be de-energized, information regarding customers within the de-energization boundaries (e.g. medical baseline customers), the estimated start date and time of the de-energization event, estimated length of the de-energization event and estimated restoration times.

18. It is reasonable to require the electric investor-owned utilities to provide geographic information to public safety partners as set forth in Appendix A.

19. It is reasonable to require the electric investor-owned utilities to partner with local public safety partners to communicate to impacted customers that a de-energization event is possible, the estimated start date and time of the de-energization event, the estimated length of the de-energization event, and the estimated time to power restoration.

20. The electric-owned utilities should partner with state and local public safety partners to develop notification strategies that comport with the California Alert and Warning Guidelines.
21. It is reasonable to require the electric investor-owned utilities, in collaboration with state and local public safety agencies, to deliver notifications to all customer groups in multiple formats and through multiple media channels including, but not limited to, telephonic notification, text message notification, social media advisories, emails and messages to agencies that serve disadvantaged communities within an impacted area to allow.
22. It is reasonable to require the electric investor-owned utilities to develop notification strategies that consider the geographic and cultural demographics of affected areas.
23. The investor-owned utilities, in partnership with local and state public safety partners, should develop notification strategies for AFN populations up to and including in-person notification.
24. It is reasonable to require the electric investor-owned utilities, in coordination with public safety partners and critical infrastructure facilities, to develop a communication strategy once de-energization has begun when access to some communication channels may be restricted due to the loss of power.
25. Even though the electric investor-owned utilities are not government agencies, it is reasonable for the utilities to coordinate with local and state agencies consistent with SEMS.
26. It is reasonable to require the electric investor-owned utilities to provide, if requested by local jurisdictions, relevant GIS data for that jurisdiction including identification of critical facilities, circuits and number of medical baseline customers in advance of wildfire season.
27. The electric investor-owned utilities should embed a liaison that is empowered to provide rapid and accurate information regarding the de-energization event in local EOCs and at the state Operations Center if requested.

28. The electric investor-owned utilities should designate an EOC liaison lead with decision-making authority to coordinate communication with embedded liaisons.
29. When an electric investor-owned utility forms an EOC, it must hold a space for and invite representatives from CalOES, water infrastructure providers, and communication providers.
30. It is reasonable to require electric investor-owned utilities to only respond to requests to delay de-energization from public safety partners and critical infrastructure facilities. The electric investor-owned utilities ~~should retain~~ does not ultimate authority to grant or deny a delay and responsibility to determine how a delay will impact the public safety; this authority should reside with other safety agencies, like OSHA, CAOES or CAL FIRE.
31. It is reasonable to require the electric investor-owned utilities to work with public safety partners and critical infrastructure facilities in advance of wildfire season to develop preliminary plans for addressing emergency situations that may arise concurrent with de-energization, such as ignition of a wildfire, where re-energization of energized lines may provide greater public safety benefits.
32. In the event of a transmission-level de-energization, it is reasonable to require the electric investor-owned utilities to provide notice to and coordinate with the CAISO, CalOES and CAL FIRE. The utilities ~~should~~ shall comply with FERC and NERC reliability standards. No action on transmission-level de-energization is authorized by this order absent the establishment of conditions to address of the impacts and measures to address consequences of such actions on critical infrastructure facilities.
33. It is reasonable to require the electric investor-owned utilities to submit post-de-energization reports according to the parameters set forth in Appendix A.
34. SED should assist the Commission, in Phase 2 of this proceeding, to develop reasonableness guidelines for assessing de-energization events.
35. R.18-12-005 should remain open to address additional issues in Phase 2.