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

Application of Pacific Gas and Electric
Company for Approval of its Mobile
Application and Supporting Systems Pilot.

(U 39 E)

Application 19-07-019
(Filed July 29, 2019)

**PACIFIC GAS AND ELECTRIC COMPANY
(U 39 E) RESPONSE TO RULING OF JUNE 9, 2020**

ALYSSA KOO
JESSICA BASILIO

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-5548
Facsimile: (415) 973-5520
Email: Jessica.Basilio@pge.com

Dated: June 17, 2020

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

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(U 39 E) RESPONSE TO RULING OF JUNE 9, 2020**

Pacific Gas and Electric Company (PG&E) files this response pursuant to Administrative Law Judge DeAngelis' ruling of June 9, 2020, ordering PG&E to respond to questions on or before June 17, 2020.

PG&E provides the questions and responses below:

Question 1:

PG&E's initial review process for mobile app reports describes a procedure by which PG&E will screen report submittals for emergency matters, and if found, will act to forward the report to appropriate first responders. Yet at the same time, PG&E has indicated that the mobile app, as proposed, would not be intended to address such 911-level reports, and that the utility has included within the mobile app's operations adequate controls and customer advisories to ensure that 911-level matters are not reported via the mobile app. How does PG&E reconcile this seeming contradiction?

Answer 1:

Respectfully, PG&E believes its positions are consistent. In summary, PG&E believes that the mobile app should be used to report physical asset conditions, which may or may not be actual safety issues. PG&E believes the mobile app should not be utilized for emergency reporting. However, because PG&E cannot absolutely prevent mobile app users from reporting emergencies, it must have processes in place if that occurs. PG&E elaborates below.

The public should report emergencies—such as a wires-down situation—through the local emergency dispatch (i.e., by dialing 9-1-1). Reporting through the local emergency

dispatch connects the person directly to emergency personnel and leads to the fastest dispatch of the appropriate first responders (i.e., sending police, fire, ambulance, etc.).

Reporting emergencies through the mobile app would just provide a more circuitous pathway to reach local emergency dispatch. Rather than contacting the local emergency dispatch directly, as in the case of dialing 9-1-1, the person would submit a report to PG&E. PG&E would then in turn analyze that request and either contact the local emergency dispatch via 9-1-1, or request that the customer contact emergency dispatch. Delay in the reporting of an emergency increases the risk of injury or death.

Additionally, the intake of an emergency report telephonically is more effective than through the mobile app. Telephonic intake through the local emergency dispatch allows the dispatcher to ask questions of the person reporting and obtain valuable situational information and provide the reporter with critical life safety instructions.

Thus, reporting through the mobile app delays the reporting of an emergency and is a less effective reporting tool in these instances.

PG&E has consistently urged members of the public to first ensure their personal physical safety, then call 9-1-1, and finally report issues to PG&E via a toll-free number. While PG&E believes strongly that the mobile app should not be used to report emergencies, it cannot absolutely prevent users from doing so (e.g., by photographing a downed wire). PG&E will discourage emergency reporting solely via the mobile app through the language and training provided in the app itself. For example, opening the app PG&E will ask the reporting party a set of confirming questions, to validate that the report is not an emergency: “Is the line down, sparking or on fire?”. If yes, **leave the area immediately** and **call 9-1-1** to dispatch emergency first responders. Then, call PG&E’s report line at 1-800-PGE-5000”. However; users may still proceed to report such emergency conditions via the mobile pathway. The procedure described in the mobile app report, by which PG&E will perform additional validations and screening of emergency matters is an additional precautionary measure intended to further reduce risk.

Question 2:

PG&E appears to treat reports found to be 911-level matters, as “invalid.” Explain the use of the term “invalid” with regard to 911-level matters. Is our understanding correct that PG&E appears to treat reports found to be 911-level matters, as “invalid.”? How does PG&E justify this practice?

Answer 2:

PG&E treats emergencies with the utmost seriousness and has attempted to ensure its mobile app would not interfere with the timely reporting of an emergency through the local emergency dispatch. The term “invalid” in this context applies to the reporting of an emergency through the mobile app, which, as explained above is a less efficient and less effective reporting tool.

To be absolutely clear, PG&E does not believe the emergencies themselves are invalid; rather, PG&E believes that reporting emergencies would be an inappropriate use of the mobile app and thus invalid for the purposes of evaluating whether the mobile app can be used to identify issues with PG&E’s infrastructure.

To elaborate, the term “invalid” relates to PG&E’s process and criteria for evaluating whether the pilot is successful. This includes a requirement that PG&E receive at least 384 “valid” reports during the pilot phase. For the report to be “valid” for purposes of measuring the success of the pilot, it must:

1. Identify genuine safety issues on utility assets that pose an ignition risk;
2. Be used in areas with wildfire risk; and
3. Identify unique issues of PG&E assets that were not, and would not have otherwise been identified through PG&E’s own routine maintenance program
 - a. PG&E will count safety issues on other utilities assets such as cable and phone towards the sample size
 - b. PG&E will count duplicate submissions towards the sample size

PG&E would consider the reporting of an emergency as invalid because it is an inappropriate use of the mobile app and would not be counted towards the 384 unique reports

needed to measure public interest of crowdsourcing utility physical safety issues. PG&E would include reports of emergency issues in its overall evaluation report, these would just not be counted towards the 384 unique reports.

Question 3:

It is unclear whether PG&E intends to treat reports found to be 911-level matters as reports that it will not record in its database. If PG&E does not intend to store in its database those reports found to be 911-level matters, how does PG&E justify this practice?

Answer 3:

To clarify, PG&E will record any 911-level matters received from the mobile app in the database created for this pilot.

Question 4:

Clarify whether the various terminology PG&E employs to describe certain hypothetical reports -- “immediate,” “emergency,” and “911-level” issues -- is interchangeable? If not interchangeable, explain how any distinctions affect PG&E’s action and response upon receipt of a safety report via the mobile app characterized as “immediate,” “emergency,” and “911-level” issues.

Answer 4:

To clarify, PG&E does not intend for the terms “immediate,” “emergency,” and “911-level” to be interchangeable. PG&E intends the term “emergency” and “911-level” to be interchangeable as indicating a situation requiring the attention of emergency first responder personnel because there is an imminent threat to the public health and safety (e.g., a wires down situation). The term “immediate” is intended to convey a situation where an issue is identified on PG&E’s infrastructure that requires an immediate response by PG&E personnel, aligned with General Order 95 Rule 18 (Level 1 priority).

Question 5:

Explain why the mobile app pilot cannot practically address urgent matters, such as power outages and safety emergencies when the utility now maintains a 24-hour phone hotline for such purposes, and in light of PG&E already employing a procedure to address and elevate any 911-level reports received via mobile app.

Answer 5:

The mobile app cannot practically address emergencies because it is inherently a less efficient and less effective reporting pathway. As stated previously, the public should report emergencies—such as a wires-down situation—through the local emergency dispatch (i.e., by dialing 9-1-1). Reporting through the local emergency dispatch connects them directly to trained emergency personnel and leads to the fastest dispatch of the appropriate first responders (i.e., sending police, fire, ambulance, etc.).

Reporting emergencies through the mobile app would provide a more circuitous pathway to reach local emergency dispatch. Rather than contacting the local emergency dispatch directly, as in the case of dialing 9-1-1, the person would submit a report to PG&E. PG&E would then in turn analyze that request and either contact the local emergency dispatch via 9-1-1, or request that the customer contact emergency dispatch. Delay in the reporting of an emergency increases the risk of injury or death.

Additionally, the intake of an emergency report telephonically is more effective than through the mobile app. Telephonic intake through the local emergency dispatch allows the dispatcher to ask questions of the person reporting and obtain valuable situational information and provide the reporter with critical life safety instructions.

As the question notes, PG&E does maintain a 24-hour phone line to report outages. However, the fact that PG&E maintains a 24-hour phone line is not inconsistent with the idea that a mobile app is an inappropriate reporting pathway for emergencies and telephonic reporting is superior. PG&E's toll-free hotline does not mitigate deficiencies of a mobile app in these situations.

Also, as the question notes, PG&E's includes a process to "elevate any 911-level reports" for those users who disregard PG&E's warnings and inappropriately use the app to report an emergency. This process does not mitigate the above-mentioned defects of the mobile app. In fact, PG&E's required elevation of 911 reports made via the mobile app is what would make this a more circuitous pathway.

Finally, the question refers to power outages. For most customers, an outage is undesirable but not life-threatening situation. In non-emergency outages, customers already may report an outage online or by calling 1-800-743-5002. In cases where an outage is life-threatening, the customer should call emergency responders.

Question 6:

Indicate whether PG&E foresees a future point in time when the utility would expect to be supportive of testing having some share of the call traffic now directed to its 24-hour power outages and safety emergencies phone hotline instead conveyed to the utility via a mobile app.

Answer 6:

PG&E does not support this suggestion for the aforementioned reasons. The app is not conducive to emergency reporting. In emergency situations, the public should to speak with a live person to ensure a timely and effective response.

Question 7:

In its reply to the protest by Public Advocates Office at the California Public Utilities Commission (Cal Advocates), PG&E offered assurances that it would collaborate with Cal Advocates to establish an appropriate portion of Tier 2 HFTD to include within the pilot. However, we have received no notification of the result, if any, of such effort. PG&E shall describe what, if any, effort was made to communicate and coordinate with Cal Advocates on the subject; what portion of Tier 2 HFTD PG&E recommends including within the pilot effort and the resulting HFTD geographic area that would be covered by the pilot as a percentage of all HFTD area; and whether PG&E's recommendation has secured the endorsement of Cal Advocates.

Answer 7:

This issue is now moot. PG&E's pilot application suggested the pilot target Tier 3 HFTD locations.^{1/} After receiving the protest filed by The Public Advocates Office suggesting portions

^{1/} Mobile Application and Supporting Systems Pilot Application, p. 10.

of Tier 2 also be included in the pilot,^{2/} PG&E indicated in our Reply to Protest, that we are willing to work with The Public Advocates Office to define a subset of Tier 2 and Tier 3 for the pilot launch.^{3/} However, upon further analysis, and as we stated in our Revision to Mobile Application and Support Systems Pilot Application, there are approximately 300,000 customers in Tier 2 or Tier 3 high fire threat districts with email addresses on file.^{4/} To reach the required number of submissions for the pilot, PG&E will email all 300,000 Tier 2 and Tier 3 customers with email addresses on file. Response rates will be monitored and if submissions are insufficient to reach target volumes, PG&E will implement a direct mail campaign to an appropriate number of remaining customers in Tier 2 and Tier 3 threat districts to attempt to generate additional submissions.^{5/} For the above reasons, PG&E's previous suggestion of defining locations within Tier 2 and Tier 3 jointly with The Public Advocates Office, is no longer valid. Instead, our outreach will focus on customer email addresses that we have on file for Tier 2 and Tier 3.

Respectfully Submitted,

ALYSSA KOO
JESSICA BASILIO

By: /s/ Jessica Basilio
JESSICA BASILIO

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-5548
Facsimile: (415) 973-5520
Email: Jessica.Basilio@pge.com

Dated: June 17, 2020

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

^{2/} Protest of The Public Advocates Office, p. 2.

^{3/} Reply to Protest, p. 4.

^{4/} Revision to Mobile Application and Support Systems Pilot Application, p. 27.

^{5/} Id.