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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 (Filed December 13, 2018)

WILLIAM B. ABRAMS COMMENTS ON THE DRAFT STAFF TEMPLATE FOR DE-ENERGIZATION POST-EVENT REPORTS AND LESSONS LEARNED

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I. Introduction

William B. Abrams received party status via written ruling on January 24, 2019. In accordance with the July 7, 2021 email ruling by Administrative Law Judge DeAngelis, William B. Abrams submits these comments in response to the Safety Enforcement Division ("**SED**") Staff's Draft Template for PSPS post-event reporting.

I appreciate SED's solid work incorporating the feedback from parties to the proceeding and have included my additional feedback regarding this draft template.

II. Decision Making Process

The defined decision-making process in the proposed template is a solid step forward for understanding how each Investor Owned Utility ("**IOU**") determines whether or not to shut off power. However, there are a few additional criteria that would help the commission and SED understand the decision criteria and best-practices of each IOU. Please, consider the following additions:

1. **Decision Tree** – If the IOUs were able to provide a decision tree it would provide added context and a graphical representation to understand variations in process and timing across utilities relative to specific PSPS decision making process points. After identifying best practices in the design, SED could look to standardize this as a way to compare and contrast.
2. **Map of Reclosures and other Sectionalization Devices** – As we have seen from recent PSPS events and from recent PG&E fires like the Kincade Fire and Dixie Fire, understanding where reclosures are located is key to the decision criteria and the degree to which a utility was able to be surgical regarding their application of PSPS events. Understanding the capabilities of all sectionalization devices in the area including those that were and were not leveraged during the event would provide valuable insight. If we relegate this information to other sections, we will not understand the degree to which it impacted de-energization decisions.
3. **Organization Chart Relative to Decision Escalation and PSPS Execution** – Understanding how information flows upstream to executive and senior manager decision makers from the staff level is important. SED needs to understand if information flows readily to the decision makers in a timely way and/or if there are bottlenecks in the decision-making process. The draft staff report correctly identifies criteria for the decisions but how and when that information reached the decision makers are critical data points to understand the relative success of PSPS events. The timing of when staff identified the factors in the decision (wind speed, humidity, vegetation management completion, etc.) and how long it took to reach the decision-makers is critical. As an example, early reports of the PG&E Dixie Fire seem to

indicate that line staff understood there were problems around the ignition site well before a decision was made to de-energize the line. This demonstrates that the extent to which on the ground information does or does not flow readily to decision-makers is key. Similarly, SED needs to understand the information flow from decision makers downstream to staff executing PSPS events. How long does it take each IOU from the time it makes the PSPS decision to actually execute and shut power? If SED is able to understand the cycle time for each step then we can identify potential bottlenecks and best practices.

III. De-energized Time, Place and Duration and Customers

This is a good starting point for understanding the on-the-ground impacts to PSPS events. However, it will be critical for SED to gauge more information about the customers in the effected de-energization zone and to understand how the timeline of these IOU actions corresponds with the actions of Local Emergency Managers and other professionals to ensure the health and safety of the public. Although, some of these issues like the implementation of resource centers are covered in other sections of the template, it will be important for certain pieces to be shown in the context of "time, place, duration and customers" to understand the interdependencies. Please, consider the following additions to this section:

1. **AFN Populations** - It will be important for IOUs and SED to understand the extent to which Medical Baseline and Access and Functional Needs ("**AFN**") customers were impacted by these power shutoffs. The ability of IOUs to identify and communicate to these populations must start with understanding how many customers within these populations are effected. The timelines for communicating and supporting these ratepayers in the context of the operational de-enerization activities themselves are important and should not be mapped independently.
2. **Emergency Coordination** – Understanding the timing of PSPS events in isolation will not be as helpful for SED or the IOUs without context relative to the implementation of other safety measures. Were resource centers identified and announced before de-energization announcements or after? How much lead time was provided and was it

sufficient to ensure solid execution? Were local agencies given ample time to implement emergency traffic provisions, re-assign/deploy police, fire, EMS and other necessary first-responders? The timelines of utility actions should be looked at within the context of the other emergency preparedness actions to ensure we have a well-coordinated PSPS event.

3. **Geospatial Data in Context** – The geospatial data indicated in the draft template is important but overlaying this data with the positioning of emergency resources will provide valuable context. We should understand how emergency resources were positioned within the effected de-energized area to ensure safety and establish best practices. Additionally, asking IOUs to provide utility-specific GIS data overlaid with the GIS data form local emergency management partners will encourage coordination in reporting activities and a more integrated strategy.

IV. Damage and Hazards to Overhead Facilities

Again, this reporting needs more context if it is going to be actionable and provide a true picture regarding the degree to which PSPS actions were prudent. Specifically, we need to understand the degree to which lapses or underperformance related to utility mitigation activities contributed to a power shutoff. As an example, if a utility did not meet standards for vegetation management on a particular line segment, did that underperformance precipitate a PSPS event? If a particular utility underperformed regarding undergrounding, covered conductors, replacement of C hooks or jumper cables, we should hope that this would be a factor in PSPS decisions.

If this draft staff report only considers external factors and risks (wind, humidity, etc.) that lead to PSPS decisions then it will not provide a full or accurate picture regarding the decision-making processes and the tradeoffs for when and when not to de-energize lines. Similarly, it would be important for IOUs to point out hazards that may be under the control of the private sector or public agencies that contribute to PSPS decisions. As an example, hazardous material facilities that warehouse combustible materials in an area might be a huge factor in a PSPS determination and should be considered by an IOU. If we ask the utilities to report this information it will encourage the type of collaboration we need to limit power shutoffs and

potential wildfires. These PSPS events do not live within a utility-centric vacuum and we will not have a clear post-fire report without considering the broader context in which utilities operate.

V. Notifications

The required reporting based on this draft template only recognizes one-side of the notification. It recognizes if and when a notification was sent but does nothing to indicate if the information within the notification was received and understood. Any evaluation of effective communications and communication channels must include measurements of how the notifications were received by the target audience. Utilities, SED and the Commission should not assume that a notification sent is a notification received and understood. As an example, in earlier Wildfire Mitigation Plans ("**WMPs**") by some of the utilities, it was apparent that hang ups from robo-calls were considered a notification. This simply should not suffice and we must have the utilities report on the effectiveness of the notifications and not just on activity metrics.

Moreover, it will be important to include the mode of the communications so we can establish best practices and understand how a notification may be sent leads to more effective communications. This should be broken down by target segment (AFN populations, ESJ Communities, etc.) so that we can understand which modes of communications around these events are best for certain ratepayers. It will be important for SED to look at these notifications within the context of when public safety partners also notified the general public. We should require the reporting from the utilities regarding when public safety partners communicated these events so we can understand these notifications in context. We do not want a diffusion of responsibility where there was an assumption that a safety partner would send a notification and therefore it was not transmitted by a utility directly to a particular audience.

VI. Local and State Public Safety Partner Engagement

I have no added comments for this section at this time.

VII. Complaints and Claims

There needs to be more definition and categorization of these complaints and claims if they are going to provide direction and be actionable by SED or the utilities themselves. We should have these complaints delineated based upon time-period (pre de-energization, during de-energization, post de-energization) and categorized to align with the sections of this draft report. In this manner, we can understand the reportable actions of the utilities alongside the complaints relative to those actions. As an example, we need to see the notifications alongside ratepayer complaints about the notifications. We can then better understand the actions in context. Similarly, if we see a pattern of complaints relative to how and when resource centers are implemented we can provide corrective action.

VIII. Power Restoration

We cannot understand the relative success of power restoration unless we understand the line inspections and monitoring that occurred on the lines prior to re-energization. Arguably, this time period is the riskiest for the grid during these PSPS events and we need to understand the context for when delays in restoration of power may be warranted. Moreover, we need to understand the tradeoffs between more manual inspections like on-the-ground visual inspections vs. drone or helicopter inspections of lines. There is a lot of outside pressures on the utilities to restore power quickly which is appropriate but we don't want this to lead to shortcuts in the inspection of lines during these risky time-periods. I would also suggest that we map these power-restoration challenges to the decision-making criteria for the PSPS event. I would assume that power restoration after wind events would lead to slower power restoration then those PSPS events that were primarily due to extreme heat conditions. However, having a factual basis rather than assumptions will be helpful. We might learn from this that we can increase the time-period of power restoration for certain PSPS conditions while decreasing the target time-period for re-energization when other conditions exist.

IX. Community Resource Centers

The reporting requirements of this section seem to not focus on the effectiveness of the resource centers and should be realigned to understand the degree to which these resource centers met the needs of the public. The "amenities provided" column will not provide the specificity that we need to understand what services are leveraged. We should survey those that arrive at these centers to understand their primary motivation for utilizing the resource centers. If we understand that the primary reason individuals seek resource centers is to avoid the heat and seek air conditioning then we might require more cooling centers. However, if individuals are coming to the centers for charging cell phones or wheelchairs or other devices then we may expect the utilities to take different actions. This context is important.

We also cannot divorce this section of the report from the notifications and accessibility of these Resource Centers. If we see resource centers underutilized for a particular function (cooling, charging, resource referral, etc.), we might make a false assumption that these services are not needed within a particular community. However, this may be due to a lack of notification or just ineffective notification. This is why I have pushed for pre-determining site locations and backup site locations and communicating those locations prior to wildfire season and leading up to PSPS events. Again, understanding the effectiveness of communications will be critical for utilities and SED to understand as we identify best-practices and corrective actions.

X. Mitigations to Reduce Impact

This section presents this information in the affirmative but does not represent mitigation activities that were not leveraged to reduce the impacts of PSPS events. This section requires that IOUs identify those actions and devices that "mitigated the impact of the event." However, it is equally important to understand the devices and actions that were not deployed to mitigate the event. As an example, we have seen with past fires and past PSPS events that certain wind sensors and/or reclosures were not leveraged. Sometimes, we have seen utility-caused wildfires during PSPS events like the PG&E Kincade Fire which begs the question of which mitigation resources and actions were not deployed to prevent the fire and/or to limit the negative

consequences of PSPS events. I strongly suggest that we ask the utilities to report both sides of this equation so we can properly dissect and diagnose the associated tradeoffs.

XI. Lessons Learned from the Event

I have mentioned the impact on lessons learned in each of the above sections. I believe that these lessons learned should be a sub-category within the other sections so we can understand which lessons apply in the context of the rest of the report. As an example, what are the lessons learned from the deployment of resource centers?

XII. Other Relevant Information and Conclusion

I believe that this draft staff template for de-energization post-event reports can be a strong next step in our understanding and effective implementation of PSPS events. However, context of this information is critical. We need to understand the interdependencies between these categories if we are going to gain an understanding regarding the relative effectiveness of each event across the various IOUs. Reporting out on activity metrics relative to each category will not help our utilities or ratepayers understand the tradeoffs associated with these events.

I strongly urge the Safety and Enforcement Division to ask themselves for each data point required and section of the report the following two questions:

1. Is this information actionable?
2. Does this information provide the context needed to evaluate effectiveness?

If the information is not actionable by the utility, SED or other stakeholders then we should strike it from the report and/or refine the requirements. Similarly, if we don't understand the context, it might provide SED and the utility a false indication of the relative effectiveness of the actions. I understand that this template is designed to be an iterative process, however if we don't set a strong baseline based on these two questions then we run the risk of iterating in the wrong direction and/or drawing conclusions without the proper context. Once again, I want to

commend the staff who worked on this template as it is directionally sound. I hope my comments are received as they are intended to refine the report so it can be more actionable and lead to more effective de-energization decisions.

Respectfully submitted, Dated: August 6, 2021

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