

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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

Rulemaking 18-12-005

**COMMENTS OF THE PUBLIC ADVOCATES OFFICE
ON THE PACIFIC GAS AND ELECTRIC COMPANY'S SEPTEMBER 2, 2021
PUBLIC SAFETY POWER SHUTOFF POST-EVENT REPORT**

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September 17, 2021

Pursuant to Pursuant to Decision (D.) 21-06-014,¹ the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits its comments on Pacific Gas and Electric Company's (PG&E) September 2, 2021, Public Safety Power Shutoff (PSPS) Report (post-event report). A copy of the letter containing the Public Advocates Office's comments is attached as Attachment A of this filing.

Respectfully submitted,

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¹ *Decision Addressing the Late 2019 Public Safety Power Shutoffs by Pacific Gas and Electric company, Southern California Edison Company, and San Diego Gas & Electric Company to Mitigate the Risk of Wildfire Caused by Utility Infrastructure*, issued June 7, 2021, p. 236 [parties must file comments in response to 10-day PSPS reports in R.18-12-005.]

ATTACHMENT A

PUBLIC ADVOCATES OFFICE

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
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September 17, 2021

Leslie Lee Palmer
Director, Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
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Re: Public Advocates Office's Comments on PG&E's August 17-19, 2021 Public Safety Power Shutoff Report Pursuant to Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions, Rulemaking 18-12-005

Director Palmer:

Pursuant to Decision (D.)19-05-042¹ and D.21-06-014,² the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) provides the following comments on Pacific Gas and Electric Company's (PG&E) September 2, 2021 Public Safety Power Shutoff (PSPS) Report (post-event report).

¹ See *Decision Adopting De-Energization (Public Safety Power Shut-Off) Guidelines (Phase 1 Guidelines)*, issued June 4, 2019, p. 107 as modified by *Decision Adopting Phase 3 Revised and Additional Guidelines and Rules for Public Safety Power Shutoffs (Proactive De-Energizations) of Electrical Facilities to Mitigate Wildfire Risk Caused By Utility Infrastructure*, issued June 29, 2021 (D.21-06-034), which provides "affected stakeholders may serve comments on the electric investor owned utility's (the utilities') post-event report in order to inform [the Safety and Enforcement Division's] compliance review."

² See *Decision Addressing the Late 2019 Public Safety Power Shutoffs by Pacific Gas and Electric company, Southern California Edison Company, and San Diego Gas & Electric Company to Mitigate the Risk of Wildfire Caused by Utility Infrastructure*, issued June 7, 2021, p. 236 [parties must file comments in response to 10-day reports in R.18-12-005.]

I. INTRODUCTION

On August 15, 2021, PG&E activated its Emergency Operations Center following an August 14, 2021 notification of a potential weather event from its meteorology team. On August 17, 2021, at approximately 5:00pm, PG&E initiated de-energization in nine different “Time-Places”³ throughout 13 counties, which affected 48,155 customer accounts, including 3,856 Medical Baseline customer accounts and 936 critical facilities.⁴ PG&E restored power to all customers by approximately 6:57 pm on August 19, 2021. PG&E submitted its post-event report on September 2, 2021.⁵

Resolution ESRB-8,⁶ D.19-05-042, D.20-05-051,⁷ D.21-06-014,⁸ and D.21-06-034 establish de-energization guidelines for the electric utilities’ (the IOUs)⁹ planning and execution of de-energization events.¹⁰ PG&E’s August 17 to 19, 2021 de-energization event and its associated post-event report demonstrates marked improvement in PG&E’s

³ “A Time-Place (TP) is a portion of the PG&E grid that is electrically and geographically coherent and is forecast to experience consistent timing for severe fire weather.” PG&E Public Safety Power Shutoff August 17 to 19, 2021 Post-Event Report, pp. 3 fn 3.

⁴ PG&E Public Safety Power Shutoff August 17 to 19, 2021 Post-Event Report, pp. 1-5.

⁵ While PG&E distributed its report to the service list, it does not appear PG&E filed its report in the docket for proceeding R.18-12-005, as directed by D.21-06-014.

⁶ *Resolution Extending De-Energization Reasonableness, Notification, Mitigation and Reporting Requirements in Decision 12-04-024 to All Electric Investor Owned Utilities*, issued July 16, 2018, which provides at p. 5: “IOUs shall submit a report to the Director of SED within 10 business days after each de-energization event, as well as after high-threat events where the IOU provided notifications to local government, agencies, and customers of possible de-energization though no de-energization occurred.”

⁷ *Decision Adopting Phase 2 Updated and Additional Guidelines for De-Energization of Electric Facilities to Mitigate Wildfire Risk*, issued June 5, 2020.

⁸ *Decision Addressing the Late 2019 Public Safety Power Shutoffs by Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company to Mitigate the Risk of Wildfire Caused by Utility Infrastructure*, issued June 7, 2021.

⁹ These requirements apply to the CPUC’s jurisdictional electric corporations: Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), Liberty Utilities/CalPeco Electric (Liberty), Bear Valley Electric Service, a division of Golden State Water Company (Bear Valley), and PacifiCorp. To date, only PacifiCorp, PG&E, SCE, and SDG&E have initiated a de-energization event.

¹⁰ The Phase 3 De-Energization Decision replaces SED’s “reasonableness review” (D.19-05-042, p. 107) with a “compliance review”, to determine whether the electric investor-owned utilities complied with applicable PSPS guidelines and rules separate from a finding of reasonableness by the Commission. *See* D.21-06-034, p. 24.

forecasting and execution of de-energization events when compared to PG&E’s 2019 and 2020 performance. However, Cal Advocates analyzed PG&E’s post-event report against the de-energization guidelines and identified three deficiencies, discussed in more detail below:

- PG&E failed to explain how it included tree overstrike criteria in its decision-making process;
- PG&E should further explain the inputs to its decision-making models and their relative weights; and
- PG&E failed to adequately explain notification failures.

II. DISCUSSION

A. PG&E Failed to Explain How It Included Tree Overstrike Criteria in Its Decision-Making.

Resolution M-4856¹¹ requires that PG&E provide insight into its PSPS modeling in light of its predictions that tree overstrike considerations may have a significant impact on the frequency, duration, scope and scale of PSPS.¹² While Resolution M-4856 removed Executive Director Peterson’s requirement that PG&E describe how its PSPS decision-making was impacted by the inclusion of tree overstrike criteria on a circuit-by-circuit basis,¹³ PG&E must still acknowledge and provide basic information on tree overstrike criteria to meet the information needs of the Commission and the public.¹⁴ Resolution M-4856 acknowledges this, stating that PG&E’s inability to extricate overstrike criteria from “other criteria” limits [the Commission’s] ability to reconcile how other criteria interact with tree overstrike criteria to render them inseparable.¹⁵

In its post-event report, PG&E does not even mention tree overstrike as an element

¹¹ Resolution M-4856. *Ratifies the Executive Director’s Letter to Pacific Gas and Electric Company (PG&E) Directing PG&E to Comply with Certain Requirements Pertaining to PG&E’s Implementation of Tree Overstrike Criteria in its Public Safety Power Shutoff (PSPS) De-Energization Decision-Making*, issued August 6, 2021.

¹² Resolution M-4856, p. 7.

¹³ Executive Director Rachel Peterson’s June 28, 2021 letter to Mr. Sumeet Singh regarding tree overstrike requirements, pp. 3-4.

¹⁴ Resolution M-4856, p. 7.

¹⁵ Resolution M-4856, p. 7.

included in its de-energization decision-making. However, PG&E is clearly using tree overstrike in its decision-making because it is listed as a discrete value that was considered in PG&E's decision to shut off power on each distribution circuit de-energized during the August 17-21, 2021 de-energization event.¹⁶ Because PG&E does not provide any information about how the tree overstrike values are used in PSPS decision-making or describe how the listed overstrike risk values are calculated, SED should determine that this portion of PG&E's post-event report is not in compliance with Resolution M-4856.

B. PG&E Should Further Explain the Inputs to its Decision-Making Models and Their Relative Weights.

The de-energization guidelines adopted in D.19-05-042, ESRB-8, and D.20-05-051 require that the IOUs include certain information in their post-event reports regarding the decision-making process to execute a de-energization event.¹⁷ PG&E is required to provide the CPUC with all factors considered in the decision to shut off power.¹⁸ While PG&E describes various factors it used to determine de-energization was necessary, its description of inputs to PG&E's models that result in a decision to de-energize remain opaque and unexplained.

PG&E describes several modeling inputs to its decision-making, specifically consideration of known high risk vegetation and electric compliance tags, catastrophic fire probability, and a multi-attribute value function framework to assess the risk to public safety caused by de-energization against the benefit (avoided ignition) of executing a de-energization event. For these examples and the various other factors listed in PG&E's post-event report, PG&E should clarify exactly how it is using and weighting these inputs when deciding to de-energize each circuit. For example, PG&E should specify in its report if electric compliance tags or the presence of known high-risk

¹⁶ PG&E Public Safety Power Shutoff August 17 to 19, 2021 Post-Event Report, pp. App-2-5.

¹⁷ See D.19-05-042, p. A22.

¹⁸ Resolution ESRB-8, p. 3.

vegetation was weighted more heavily than other factors, and then describe how PG&E plans to mitigate those compliance issues that were a leading cause of de-energization in the future (e.g. the date when PG&E will apply vegetation management to the impacted circuits and address electric compliance tags).

A similar issue exists with PG&E's description of risk models used to quantify the risk-to-benefit ratio¹⁹ associated with initiating and not initiating a de-energization event. PG&E states that it calculates and then weighs potential risk consequence and potential benefit but does not explain how it arrived at the specific values presented. For the August 17-19, 2021 de-energization event, the potential risk consequence is quantified as "128," with the benefit quantified as "311,120," yielding a risk benefit ratio of "2,428."²⁰ PG&E does not explain any of these values, calculations, or provide other information (such as units or a comparison of what risk consequences could result in an approximate value of 128) that would make the information analytically meaningful. In future reports, SED should require PG&E to show its work as to how it arrived at the values used to determine the public safety risk/benefit ratio of executing a de-energization event.

C. PG&E Failed to Adequately Explain Notification Failures.

PG&E is required to follow the notification timeline described in D.19-05-042. This notification structure requires the IOUs to provide customers with advance notice: 48 to 72 hours, 24 to 48 hours, and 1 to 4 hours before de-energization.²¹ PG&E is required to report failures to adhere to this minimum timeline and explain what caused the failure.²² PG&E acknowledges that because of unspecified "data limitations," it was unable to provide a complete breakdown of the notification failures and explanations of what caused the failures.²³ For this reason, SED should conclude this aspect of PG&E's

¹⁹ This ratio is to assess the risk to public safety caused by de-energization against the benefit (avoided ignition) of executing a de-energization event.

²⁰ PG&E Public Safety Power Shutoff August 17 to 19, 2021 Post-Event Report, pp. 24-25.

²¹ D.19-05-042, pp. A8-9.

²² D.21-06-014, p. 286.

²³ PG&E Public Safety Power Shutoff August 17 to 19, 2021 Post-Event Report, p. 41.

report is not in compliance with CPUC requirements.

PG&E recommends modifying or removing the guideline to notify customers at the time when de-energization is initiated to reduce message fatigue and because it is “not value add for customers.”²⁴ Imminent de-energization notifications and upon de-energization notifications both contain an estimated time of restoration. Given that estimated time of restoration is one of the most important aspects of de-energization to customers, the requirement should remain in place at this time. In its annual de-energization report, PG&E should be required to provide more information, including on any gaps and redundancies between required notifications.

III. CONCLUSION

Cal Advocates recommends that the CPUC and SED consider the above issues when evaluating PG&E's compliance with the CPUC's de-energization and post-event report rules, guidelines, and regulations. As explained above, PG&E failed to describe how it included new tree overstrike criteria in its de-energization decision-making, which should be at minimum addressed in future post-event reports. PG&E did not elaborate on its decision-making modeling inputs and their weights, which should be better explained in any future reports. Additionally, PG&E failed to adequately explain all notification failures which may have occurred during the de-energization event.

²⁴ PG&E Public Safety Power Shutoff August 17 to 19, 2021 Post-Event Report, p. 80.

Sincerely,

/s/ Nathaniel W. Skinner
Nathaniel W. Skinner, PhD
Program Manager, Safety Branch
The Public Advocates Office

CC: Service List in R.18-12-005