



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
(Filed December 13, 2018)

**JOINT LOCAL GOVERNMENTS' RESPONSE TO PG&E AFTER-ACTION REPORT
FOR SEPTEMBER 20, 2021 DE-ENERGIZATION EVENT**

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In accordance with Ordering Paragraph No. 63 of D.21-06-014, the Counties of Kern, Mendocino, Napa, and Sonoma, and the City of Santa Rosa (the Joint Local Governments) submit their response to PG&E's post-event report for the September 20, 2021 de-energization event. While the event impacted a relatively small number of customers, the Joint Local Governments have observed that PG&E is still suffering from some of the chronic communication and information-sharing difficulties that have persisted since the inception of PG&E's de-energization program.

Local Government Communication

PG&E's post-event report provides high-level lists of the types of information and communications PG&E provided to state, local, and tribal government partners during the de-energization event.¹ PG&E has improved its resources for government public safety partners over the years, but it remains apparent that PG&E's Public Safety Specialists—the local governments' sole means of communicating with PG&E's Emergency Operations Center (EOC)—are hindered by PG&E's internal information-sharing and communication issues. Mendocino's and Sonoma's Public Safety Specialists, who are diligent and communicative,

¹ PG&E Post-Event Report, pp. 58–61.

struggled to obtain up-to-date information from PG&E's EOC; it also appears that Mendocino's Public Safety Specialist was not informed of the potential de-energization event before PG&E began sending out automated notifications. PG&E's Public Safety Specialists also appear to lack the ability to quickly and effectively escalate critical issues up the EOC chain of command. The Joint Local Governments do not know the cause of PG&E's longstanding problems with ensuring its local government Public Safety Specialists have the most accurate and current information possible, or the resources to address problems as they arise, but PG&E appears to have gone another year without addressing it. In addition to the general issue of PG&E being unable to ensure that local governments have access to the most accurate information possible about a de-energization event, this creates specific problems for local emergency managers because PG&E wants its Public Safety Specialists to be emergency managers' sole line of communication with the utility EOC. In doing so, PG&E has designed an EOC that does not function according to established emergency management practices.

Local emergency managers—who end up being largely responsible for ensuring the on-the-ground safety of PG&E's customers during de-energization events—need PG&E to start running its EOC like other major agencies do during disasters. Direct two-way communication between the agency in charge and other responding agencies is a critical, and defining, aspect of a functioning EOC. For example, CalFIRE is in charge during large wildfires. When CalFIRE sends a Type 1 team to the area to manage the wildfire, all responding agencies can have representatives in the tent with CalFIRE. An agency representative for an Operational Area (county) can grab a CalFIRE person and talk through specific issues. Despite this level of access and direct communication, nobody usurps CalFIRE's decisionmaking authority or command, or hinders CalFIRE's ability to manage the fire. It is also important to

note that direct communication and access build trust between agencies and individuals. PG&E has never allowed local emergency managers anything close to that level of access to its EOC or EOC staff. PG&E's Public Safety Specialists do not serve as a proxy for EOC access because PG&E doesn't give them the necessary information or resources, either.

Additionally, EOC personnel in different jurisdictions and agencies know each other and they know they can pick up the phone and talk directly when issues arise during events. The fact that local emergency managers cannot name more than one or two people, if any, inside PG&E's EOC is a notable anomaly in emergency management.

Emergency management and response is based on multi-jurisdictional collaboration and communication, which is not the same as sending situation reports three times a day and holding cattle-call operational briefings in which PG&E staff appear to read from a script, and which provide no opportunity for questions or dialogue.

PG&E appears to believe that allowing direct communication and real-time troubleshooting will undermine its ability to run a de-energization event or call the shots. PG&E is wrong. PG&E also appears to believe that establishing two-way communications for local emergency managers is unworkable and that its Public Safety Specialists can provide all the information local emergency managers need. PG&E is, again, wrong. PG&E's early attempts in 2019 to have large status briefing calls that allowed for two-way communication *were* chaotic and unhelpful—because PG&E failed to use basic Incident Command System (ICS) tactics and proper meeting facilitation. CalFIRE and other emergency management agencies have long demonstrated that two-way communication during emergency events is both possible and necessary.

