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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

**COMMENTS OF THE PUBLIC ADVOCATES OFFICE  
ON THE PACIFIC GAS AND ELECTRIC COMPANY'S SEPTEMBER 20-21, 2021  
PUBLIC SAFETY POWER SHUTOFF POST-EVENT REPORT**

Pursuant to Pursuant to Decision 21-06-014,<sup>1</sup> 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 20-21, 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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October 20, 2021

<sup>1</sup>D.21-06-014, *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*, June 7, 2021, p. 236, issued in R.18-12-005 [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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October 20, 2021

**Via Electronic Mail**

Leslie Lee Palmer  
Director, Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102

**Re: Public Advocates Office's Comments on PG&E's September 20-21, 2021  
Public Safety Power Shutoff Report**

Director Palmer:

Pursuant to Decision (D.)19-05-042<sup>1</sup> and D.21-06-014,<sup>2</sup> 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 20 to 21, 2021 Public Safety Power Shutoff (PSPS) Report (post-event report). While PG&E has demonstrated some improvement overall, PG&E management implemented a new notification policy that violates the Commission's rules. PG&E's policy deprived 115 critical facilities of notification at the time of de-energization despite providing those facilities with earlier required notifications. An additional 2,853 customers received advance notice, but were again not notified at the time of de-energization, as required by Commission rules.<sup>3</sup> SED and the Commission must hold PG&E management accountable for this failure.

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<sup>1</sup> 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."

<sup>2</sup> 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.]

<sup>3</sup> PG&E Public Safety Power Shutoff September 20 to 21, 2021 Post-Event Report, p. 53.

## INTRODUCTION

On September 20, 2021, at approximately 5:30 pm, PG&E initiated de-energization in seven different “Time-Places”<sup>4</sup> throughout eight counties, which affected 2,968 customer accounts, including 234 Medical Baseline customer accounts and 115 critical facilities.<sup>5</sup> PG&E restored power to all customers by approximately 4:46 pm on September 21, 2021. PG&E submitted its post-event report on October 5, 2021.<sup>6</sup>

Resolution ESRB-8,<sup>7</sup> D.19-05-042, D.20-05-051,<sup>8</sup> D.21-06-014,<sup>9</sup> and D.21-06-034 establish de-energization guidelines for the electric utilities’ (the IOUs)<sup>10</sup> planning and execution of de-energization events.<sup>11</sup> PG&E’s September 20 to 21, 2021 de-energization event and its associated post-event report demonstrates improvement in PG&E’s identification of failures and immediate corrective actions when compared to PG&E’s 2019 and 2020 performance.<sup>12</sup> However, Cal

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<sup>4</sup> “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, p. 3, fn. 3.

<sup>5</sup> PG&E Public Safety Power Shutoff September 20 to 21, 2021 Post-Event Report, pp. 1-6.

<sup>6</sup> 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.

<sup>7</sup> *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.”

<sup>8</sup> *Decision Adopting Phase 2 Updated and Additional Guidelines for De-Energization of Electric Facilities to Mitigate Wildfire Risk*, issued June 5, 2020.

<sup>9</sup> *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.

<sup>10</sup> 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.

<sup>11</sup> 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.

<sup>12</sup> PG&E notes that of the 2,968 customers de-energized, 756 customers did not receive any notifications before de-energization. PG&E attributed this high failure rate to being forced to use a remotely operated SCADA device when planned field resources called in sick. PG&E clearly identified this issue in its post-event report and planned immediate corrective actions to prevent it from happening again. *See* PG&E Public Safety Power Shutoff September 20 to 21, 2021 Post-Event Report, pp. 5, 84.

Advocates analyzed PG&E's post-event report against the de-energization guidelines and identified the two deficiencies, discussed below:

- PG&E failed to notify customers because it unilaterally implemented a new policy that is incompatible with existing notification requirements; and
- PG&E's risk analysis is abstract and uninformative and PG&E should further explain the inputs to its decision-making models and their relative weights.

## **DISCUSSION**

### **A. PG&E Failed to Notify Customers Based on a New Policy That Violates Existing Notification Requirements.**

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, 1 to 4 hours, and immediately before de-energization.<sup>13</sup> PG&E is required to report failures to adhere to this minimum timeline and explain what caused the failure.<sup>14</sup> PG&E justified many of its notification failures during the September 20 to 21, 2021 event by reference to a PG&E policy of never sending notifications between the hours of 21:00 and 08:00 as a courtesy to customers.<sup>15</sup> The Commission has not excused any of the required notifications based on time of day or customer fatigue. Indeed, the Phase 3 De-Energization decision specifically asserts that the value of enabling the public to prepare for potential de-energizations outweighs the costs of "warning fatigue".<sup>16</sup> PG&E now asserts an obligation to refrain from sending notifications for 11 hours out of every 24-hour period and has acted on that self-imposed obligation without first seeking Commission guidance on alternatives.

The September 20 to 21, 2021 Post-Event Report continues this practice but in the future will apply case-by-case exceptions for Medical Baseline (MBL) customers whose first notification would occur between 21:00 and 08:00.<sup>17</sup> This introduces new, easily foreseeable problems. One such problem is that PG&E could plausibly notify some MBL customers while intentionally failing to notify others with no justification.

PG&E should be ordered to discontinue this notification blackout, which results in unsent notifications in violation of the Commission's PSPS notification rules. Every single Critical Facility and Infrastructure (CFI) customer de-energized during the September 20 to 21, 2021 event was not

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<sup>13</sup> D.19-05-042, pp. A8-9.

<sup>14</sup> D.21-06-014, p. 286.

<sup>15</sup> PG&E Public Safety Power Shutoff September 20 to 21, 2021 Post-Event Report, p. 39.

<sup>16</sup> D.21-06-034, p. 159 (Finding of Fact #27).

<sup>17</sup> PG&E Public Safety Power Shutoff September 20 to 21, 2021 Post-Event Report, p. 39.

given a time-of de-energization notification due to PG&E's 21:00 to 08:00 notification blackout.<sup>18</sup> Critical facilities are critical and operable at all times, not just during the day, and employ staff around the clock who would not be disturbed by nighttime notifications. Some industrial customers also would not be inconvenienced by notification at any hour of day or night. Further, SED and the Commission should fine the utility for each violation of the Commission's rules and regulations, unless and until changes to the Commission's reporting requirements are approved. SED and the Commission must hold PG&E accountable for its failures by enforcing a schedule of penalties against PG&E and its officers based on number of missed notifications to each customer type. Because PG&E deliberately and willfully under-notified its customers without adequate justification, SED should conclude this aspect of PG&E's report violates CPUC requirements.

In its annual pre-season de-energization report,<sup>19</sup> PG&E should be required to provide more information on the balance it strikes between timely notification and warning fatigue, including on whether any gaps and redundancies exist between Time-Places and other divisions of its territory it uses to trigger automated notifications.

**B. PG&E's Risk Analysis Is Uninformative and PG&E Should Further Explain the Inputs to its Decision-Making Models.**

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 that lead to the decision to execute a de-energization event.<sup>20</sup> PG&E is required to provide the Commission with all factors considered in the decision to shut off power.<sup>21</sup> 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 the values used unexplained.<sup>22</sup>

PG&E describes several modeling inputs to its decision-making, specifically the consideration of known high risk vegetation and electric compliance tags, catastrophic fire probability, and a multi-attribute value function (MAVF) 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 inputs and the various other factors listed in PG&E's post-event report, PG&E must clarify exactly how it is using and weighting these inputs when deciding to de-energize each circuit.<sup>23</sup> For example, PG&E should specify in its report if electric compliance tags or the presence of known high-risk vegetation was weighted more heavily than other factors, and describe how it plans to mitigate

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<sup>18</sup> PG&E Public Safety Power Shutoff September 20 to 21, 2021 Post-Event Report, pp. 5, 52.

<sup>19</sup> See D.21-06-034, p. A14: "Each electric investor-owned utility must file and serve its [current year] Pre-Season Report no later than July 1 of each year in R.18-12-005 or its successor proceeding."

<sup>20</sup> See D.19-05-042, p. A22.

<sup>21</sup> Resolution ESRB-8, p. 3.

<sup>22</sup> Cal Advocates has noted this issue in previous de-energization events. See Cal Advocates Comments on PG&E Public Safety Power Shutoff August 17 to 19, 2021 Post-Event Report, pp. 4 – 5.

<sup>23</sup> See D.21-06-014, p. 288.

compliance issues that contributed to the de-energization in the future (e.g., the date when PG&E will undertake vegetation management measures on the impacted circuits and address electric compliance tags).

A similar lack of clarity exists with description of risk models PG&E used to quantify the risk-to-benefit ratio<sup>24</sup> associated with initiating a de-energization event. PG&E states that it calculates and then weighs potential risk consequences and potential benefits, but does not explain how it arrived at the specific values presented. For example, for the September 20 to 21, 2021 de-energization event, the potential risk consequence is quantified as 11, with the benefit quantified as 23,024, yielding a risk benefit ratio of 2,061.<sup>25</sup> PG&E does not explain these values, calculations, or provide enough information (such as units, model inputs, or a comparison of what risk consequences could result in an approximate value of 11) that would make the information analytically meaningful.

Based on the information PG&E does provide, the disparity between risk and benefit may simply be that PG&E uses upwards of ten databases to quantify benefits of de-energization, while risks are quantified only by the numbers of customers, circuits affected, and total customer-hours. This causes the “risk to customers” score to be artificially low due to uncertainty. For direct comparison, in PG&E’s August 17 to 19, 2021 de-energization event the risk consequence was 128, the benefit was 311,120, and the ratio was 2,428.<sup>26</sup> That both risk and benefit can be orders of magnitude smaller while arriving at a similar MAVF value and the same outcome of de-energization suggests that a MAVF ratio without additional information on inputs and assumptions is not a useful way to compare de-energization risks and benefits.

In future reports, SED should require PG&E to calibrate the MAVF to a natural unit. For example, PG&E should quantify inputs in assumed total cost to customers and assumed costs to public safety (in dollars) caused by de-energization to help explain the outcomes of the MAVF calculation. PG&E should be required 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.

## **CONCLUSION**

Cal Advocates recommends that the Commission 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. PG&E and its officers must be held accountable for modifications to its notification policies that fail to comply with Commission regulations. PG&E failed to explain the inputs it uses to ensure that its risk-benefit calculation fully accounts for the costs of a PSPS event. For these reasons, SED should conclude that this report violates Commission requirements.

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<sup>24</sup> 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.

<sup>25</sup> PG&E Public Safety Power Shutoff September 20 to 21, 2021 Post-Event Report, p. 32.

<sup>26</sup> PG&E Public Safety Power Shutoff August 17 to 19, 2021 Post-Event Report, pp. 1-5; see also Comments of the Public Advocates Office on the Pacific Gas and Electric Company’s September 2, 2021 Public Safety Power Shutoff Post-Event Report, pp. 1-2.

Leslie Lee Palmer  
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October 20, 2021  
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Respectfully submitted,

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