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R1812005

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

**ASSIGNED COMMISSIONER'S RULING
ADDRESSING JULY 12, 2022 MOTION AND NOTICING
WORKSHOP ON UTILITY RESPONSE TO CUSTOMER IMPACTS
ASSOCIATED WITH FAST-TRIP POWER OUTAGES**

This ruling responds to the joint motion of Pioneer Community Energy, Sonoma Clean Power Authority, East Bay Community Energy, Marin Clean Energy, and Rural County Representatives of California, filed on July 12, 2022 (Joint Motion), which asks the California Public Utilities Commission (Commission) to “open an expedited phase or track of the instant De-Energization Rulemaking to consider time-sensitive rules to ensure that the large investor-owned utilities’ (“IOUs”) Fast Trip Programs are designed and implemented in a manner that protects public health, safety, and welfare.”¹ Fast Trip is also referred to as Enhanced Powerline Safety Settings (EPSS), Fast Curve Settings (FCS), and fast protection settings program (each herein

¹ Motion of Pioneer Community Energy, Sonoma Clean Power Authority, East Bay Community Energy, Marin Clean Energy, and Rural County Representatives of California for Consideration of Fast Trip Program Rules in the De-Energization Rulemaking filed July 12, 2022, (Joint Motion) at 1. This motion and all other documents filed in Rulemaking (R.) 18-12-005 are available on the Commission’s website at the Docket Card.

“fast trip”).² This ruling also directs staff to conduct a workshop outside of this proceeding, as detailed below.

The Joint Motion correctly highlights the immense importance of taking a close look at the large IOUs’ fast trip programs. On one hand, electrical system outages, regardless of the cause, pose public health, safety, and welfare risks. On the other hand, there is also no denying that fast trip programs reduce the substantial and growing risks associated with catastrophic wildfires.

Catastrophic wildfires are only one piece of our growing reliability puzzle. Increasingly frequent and extreme climate-driven events are posing a broader array of new reliability concerns. Together, we now face reliability risks associated with extreme heat, prolonged drought, catastrophic wildfires, and torrential downpours.

Against this complex and climate-driven backdrop, I agree with the Joint Motion in part. We must examine the large IOUs’ fast trip programs in greater detail. Their impact on our public health, safety, and welfare cannot be denied. The IOUs’ fast trip programs are related to the larger context of IOU system reliability and should be incorporated into the Commission’s broader reliability work. Therefore, Commission staff will hold a public workshop outside the instant De-Energization Rulemaking to identify an appropriate range of issues and questions that might help further inform Commission action not

² Joint Motion at 3: “Each of the State’s three large IOUs has implemented a Fast Trip program: Pacific Gas and Electric Company’s (“PG&E”) *Enhanced Powerline Safety Settings* (“EPSS”) program; Southern California Edison Company’s (“SCE”) *Fast Curve Settings* (“FCS”) program, and San Diego Gas & Electric Company’s (“SDG&E”) fast protection settings program. In each of these programs the IOU has identified certain high-risk circuits. For these circuits, the IOU has significantly increased the sensitivity of safety devices that provide a rapid shutoff of power in response to faults detected on those circuits.”

only in relation to the IOUs' fast trip programs, but also in relation to other newly emergent reliability concerns.

Of course, the Commission is already highly focused on safety and reliability. The safety and reliability of electric transmission and distribution systems has long been a core focus of the Commission's regulatory activity. For example, the Commission has established a number of standards, rules and guidelines for the purpose of promoting the safe and reliable operation of the electric system, including:

- General Order (GO) 95 (Rules for Overhead Electric Line Construction);
- GO 128 (Rules for Construction of Underground Electric Supply and Communication Systems);
- GO 165 (Inspection Cycles for Electric Distribution Facilities);
- GO 166 (Standards for Operation, Reliability, and Safety During Emergencies and Disasters); and
- GO 174 (Rules for Electric Utility Substations).

Moreover, (i) the Commission's Electric Safety and Reliability Branch regularly conducts audits of electric infrastructure throughout the state to identify and correct potential problems before they occur;³ (ii) Commission staff conducts investigations and may issue citations or take other enforcement actions in response to alleged violations of state laws and Commission rules and orders that could compromise reliability; and (iii) the Commission requires electric IOUs to conduct annual assessments of the reliability of their distribution

³ Electric and Communications Infrastructure Provider (CIP) Audits webpage uniform resource locator (url): <https://www.cpuc.ca.gov/regulatory-services/safety/electric-safety-and-reliability-branch/electric-and-cip-audits-introduction>

systems and report on those assessments in public workshops, including how the utilities plan to address reliability problems.⁴ The Commission has also taken action in the Climate Adaptation proceeding (R.18-04-019) to require utilities to plan for longer term climate risks⁵ and has recently implemented many regulatory changes to improve wildfire safety specifically.⁶

However, notwithstanding the Commission's long-standing focus on safety and reliability, as well as its recent activity to improve climate planning and reduce wildfire risk, current and emerging risks have the potential to increase the frequency and duration of power outages throughout California. These risks include aging infrastructure, increasing wildfire risks, and other extreme, climate-related weather events, ranging from west-wide heat waves to intense precipitation and flooding. For example, the most recent storms and their atmospheric rivers resulted in hundreds of thousands of outages. In light of these emerging challenges, a more fulsome and integrated reexamination of the Commission's current set of rules and practices related to promoting the safety and reliability of our electric distribution systems may be needed. In particular, the Commission's oversight of annual reliability reporting and the utilities' approach to addressing persistent reliability problems is a promising area for exploration.

To that end, Commission staff will hold a public workshop outside the instant De-Energization Rulemaking to identify the appropriate range of issues

⁴ Electric System Reliability Annual Reports webpage url: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/electric-reliability/electric-system-reliability-annual-reports>

⁵ Decision (D) 20-08-046 Ordering Paragraph 9(3) identifies key time frames ranging from 10-50 years.

⁶ See summary here: [Wildfire and Wildfire Safety \(ca.gov\)](https://www.ca.gov/wildfire-safety).

and questions that may help the Commission form a proposed scope and actions on the emerging challenges associated with reliability, including consideration of rules for governing the electric IOUs' fast trip programs. The workshop should include presentations from each of the large electric IOUs, which cover, at a minimum:

- An overview of the causes of power outages, including (i) outages related to PSPS, (ii) outages on circuits where fast trip settings are activated, and (iii) any other types of outages tracked by utilities;
- A comparison of the different backup power and customer support programs that each utility offers its customers when they experience different types of power outages, including eligibility criteria and program costs;
- How each utility identifies customers who may benefit from backup power or customer support based on their vulnerability to power outages;
- The processes each utility uses to restore service after different types of outages and the plans each utility has for improving its restoration times;
- The specific criteria and decision-making processes used by each utility to activate its respective fast trip settings, and how these criteria compare and contrast with the criteria used to initiate a PSPS event and/or alter protective device settings for other purposes, such as maintenance;
- The processes used by each utility to modify its fast trip activation criteria;
- How utilities make outage information (other than PSPS event information) available to Commission staff, customers, public safety partners, and other local and tribal government entities; and

- How utilities identify areas with reliability issues that are not caused by PSPS and what actions do the utilities take to address those issues.

The workshop should also include a presentation from the parties who filed the Joint Motion. I seek their input on issues, including, but not limited to:

- How power outages (other than those caused by PSPS events) have affected residents and businesses, including those with access and functional needs;
- How local public safety partners and other local and tribal government entities support their residents during power outages;
- Proposals of actions that electric IOUs can take to help public safety partners and other local and tribal government entities support customers before, during, and after power outages (other than those caused by PSPS events).

The workshop will be conducted on March 17 from 9:00 a.m. to 2:00 p.m. via WebEx. The workshop may be accessed as follows:

WebEx link:	https://cpuc.webex.com/cpuc/j.php?MTID=m5c57fb33abd614ea17430c1cc8addd73
Meeting Number (Access Code):	2482 859 2623
Password	2023
Call-In Number:	800-857-1917
Call-In Passcode:	1673482#

Because this ruling relates to the Commission's rules regarding safety and reliability of electric distribution systems, this ruling is served on the service lists of R.17-10-010, R.01-10-001, R.15-06-009, R.10-09-001, R.15-05-006, R.08-11-005, R.16-12-001, R.18-10-007, R.19-09-009, Application 22-09-002, R.18-03-011, R.18-04-019, R.22-02-002, and R.14-12-014.

Commission staff may provide additional guidance and direction as to the content and structure of the workshop.

IT IS RULED that: The Commission's staff will set a workshop on the topics set forth above.

Dated February 23, 2023, at San Francisco, California.

/s/ ALICE REYNOLDS

Alice Reynolds
Assigned Commissioner