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 PACIFIC GAS AND ELECTRIC COMPANY'S JUNE 19 TO 22, 2025 PUBLIC SAFETY POWER SHUTOFF POST-EVENT REPORT

Pursuant to Decision 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's) *Public Safety Power Shutoff* (PSPS) *Post-Event Report for June 19, 2025 to June 22, 2025* (PG&E 25-4 Post-Event Report), which PG&E filed with the California Public Utilities Commission on July 21, 2025. A copy of the letter to Safety and Enforcement Division containing Cal Advocates' comments is attached as Attachment A of this filing.

Respectfully submitted,

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August 5, 2025

[1] 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 at 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

STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

PUBLIC ADVOCATES OFFICE

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August 5, 2025

Via Electronic Mail

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Re: Public Advocates Office's Comments on PG&E's Public Safety Power Shutoff Report to the California Public Utilities Commission - June 19 to 22, 2025 De-energization Event

Director Palmer:

Pursuant to Decision (D.)19-05-042[1] and D.21-06-014,[2] the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) provides the following comments on the Pacific Gas and Electric Company's (PG&E's) Public Safety Power Shutoff (PSPS) Post-Event Report for June 19 to 22, 2025 (PG&E 25-4 Post-Event Report). PG&E filed this report with the California Public Utilities Commission (Commission) on July 21, 2025.

PG&E failed to comply with Commission requirements for implementing and reporting PSPS events and must improve its PSPS operations and reporting consistent with Resolution ESRB-8[3]

[1] See *Decision Adopting De-Energization (Public Safety Power Shut-Off) Guidelines (Phase 1 Guidelines),* issued June 4, 2019 (D.19-05-042) at 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,* June 29, 2021 (D.21-06-034), "[A]ffected 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*, June 7, 2021 at 236. Parties must file comments in response to 10-day reports in R.18-12-005.

[3] *Resolution Extending De-Energization Reasonableness, Notification, Mitigation and Reporting*

and Decision (D.)19-05-042,[4] D.20-05-051,[5] D.21-06-014, and D.21-06-034.[6] The Safety and Enforcement Division (SED) and the Commission should take steps to ensure that PG&E complies with Commission rules and conducts PSPS events with minimum risk to the public.

I. BACKGROUND

On June 17, 2025, PG&E identified weather conditions that could lead to wildfire risk and activated its Emergency Operations Center (EOC).[7] On June 19, 2025, PG&E initiated de-energization in 32 different "Time Places"[8] throughout 19 counties[9] and one tribal area.[10] Concurrent with the planned de-energization event, PG&E experienced what it referred to as a "grid emergency" and responded with additional unplanned outages.[11] The de-energization and unplanned outage together affected "nearly 60,000 customer" accounts[12] in San Joaquin county alone.[13] In addition, PG&E de-energized at least 804 medical baseline customers and 522 critical facility customers.[14] PG&E restored power to all customers by 4:31 p.m. on June 22, 2025.[15]

Requirements in Decision 12-04-024 to All Electric Investor Owned Utilities, July 12, 2018, at 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."

[4] *Decision Adopting De-Energization (Public Safety Power Shut-Off) Guidelines (Phase 1 Guidelines)*, June 4, 2029, at Appendix A. Appendix A sets forth the De-Energization (Public Safety Power Shut-Off) Guidelines.

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

[6] *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,* June 29, 2021.

[7] PG&E 25-4 Post-Event Report at 2.

[8] PG&E 25-4 Post-Event Report at 2. PG&E defines "Time-Place" as "a portion of the PG&E grid that is electrically and geographically coherent and is forecast to experience consistent timing for severe fire weather."

[9] PG&E 25-4 Post-Event Report at 5.

[10] PG&E 25-4 Post-Event Report at 5.

[11] PG&E 25-4 Post-Event Report at 3.

[12] Cal Advocates understands PG&E's reference to "customers" as referring to "customer accounts."

[13] *Power shutoffs and rolling blackouts collide in San Joaquin County*, Gabriel Porras, ABC10, June 20, 2025, available at https://www.abc10.com/article/news/local/power-shutoffs-rolling-blackouts-collide-san-joaquin-co/103-cf2ce4c0-1848-455d-8195-3919ba9c26ca.

[14] PG&E 25-4 Post-Event Report at 5.

[15] PG&E 25-4 Post-Event Report at 118.

Resolution ESRB-8, D.19-05-042, D.20-05-051, D.21-06-014, and D.21-06-034 establish de-energization guidelines for the investor owned utilities' (the IOUs)[16] planning and execution of de-energization events.[17] Cal Advocates analyzed whether PG&E's Post-Event Report adhered to these de-energization guidelines, and identified the following deficiencies:

- PG&E may have failed to notify tens of thousands of customers affected by its transmission-level PSPS event;
- PG&E failed to notify at least 30 critical facilities in the one-to-four hour window before de-energization; and
- PG&E de-energized circuits that had maximum sustained wind speeds far below PG&E's 19 mile-per-hour threshold.

To address the issues in PG&E's Report, Cal Advocates makes the following recommendations:

- SED should investigate whether there is a causal relationship between the grid emergency and subsequent rolling blackout that co-occurred with the PSPS event;
- SED should investigate PG&E's failure to notify at least 30 critical facilities and infrastructure (CFI)[18] customers within the one-to-four notification window before de-energization; and
- SED should investigate PG&E's improper reporting of sustained wind speed thresholds for PSPS activation.

II. DISCUSSION

A. SED should investigate PG&E's failure to provide notifications to customers affected by PG&E's transmission-level PSPS event.

PG&E's 25-4 Post-Event Report fails to include information on the over 40,000 customer accounts that were impacted by unplanned outages. These outages were attributed to "grid instability" that may have been related to PG&E's PSPS de-energization event. PG&E's Post-

[16] These requirements apply to the Commission'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 Liberty, PacifiCorp, PG&E, SCE, and SDG&E have initiated de-energization events.

[17] The Phase 3 De-Energization Decision replaces SED's "reasonableness review" (See D.19-05-042 at 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 at 24.

[18] See D.19-05-042 at C2, D.20-05-051 at A10, D.21-06-034 at A5-A6. CFI are facilities and infrastructure that are essential to the public safety and that require additional assistance and advance planning to ensure resiliency during de-energization events. These include police stations, fire stations, medical facilities, public and private utilities, senior centers, homeless shelters, tribal government providers, transportation sector.

Event Report states that a "grid emergency" caused outages at the same time as PG&E's PSPS event.[19] Thus, PG&E appears to distinguish the PSPS event from the "grid emergency" where it only reported that 16,223 customer accounts were impacted by the PSPS event.[20] In contrast, PG&E's statements to the media indicate that the grid emergency outages were "the result of four transmission lines being de-energized ahead of the high-risk fire conditions,"[21] and that in fact around 60,000 customer accounts were affected.[22] In a statement to KXTV-TV Sacramento," PG&E admits:

> What happened as we got into the late afternoon yesterday, with the overall demand for electricity increasing, the de-energized transmission line contributed to a localized grid emergency.[23]

If the transmission line de-energizations were linked to high fire risk conditions and PSPS related actions then the impacted customers should have been included in the PSPS de-energization report. Figure 1 below shows the regions affected by the PSPS events and the region impacted by the "grid emergency." The "PSPS event" areas and "grid emergency" areas are adjacent and do not overlap. If the grid instability was a consequence of PG&E's actions related to the PSPS event, then PG&E failed to include in its report an entire region that was impacted by PG&E's proactive de-energization.

SED should investigate the relationship between the grid instability and the PSPS de-energization and determine if and how these events are related. If any causal link is found between the two events, then PG&E failed to notify thousands of customers and failed to disclose the full extent of the event in the subsequent report. More importantly, SED should investigate this event given the potential for future PSPS events causing rolling blackouts in areas outside of High Fire Threat Districts. SED's assessment would provide the Commission and Stakeholders more information on the efficacy and impacts of PSPS events in these areas.

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[19] PG&E 25-4 Post-Event Report at 3.

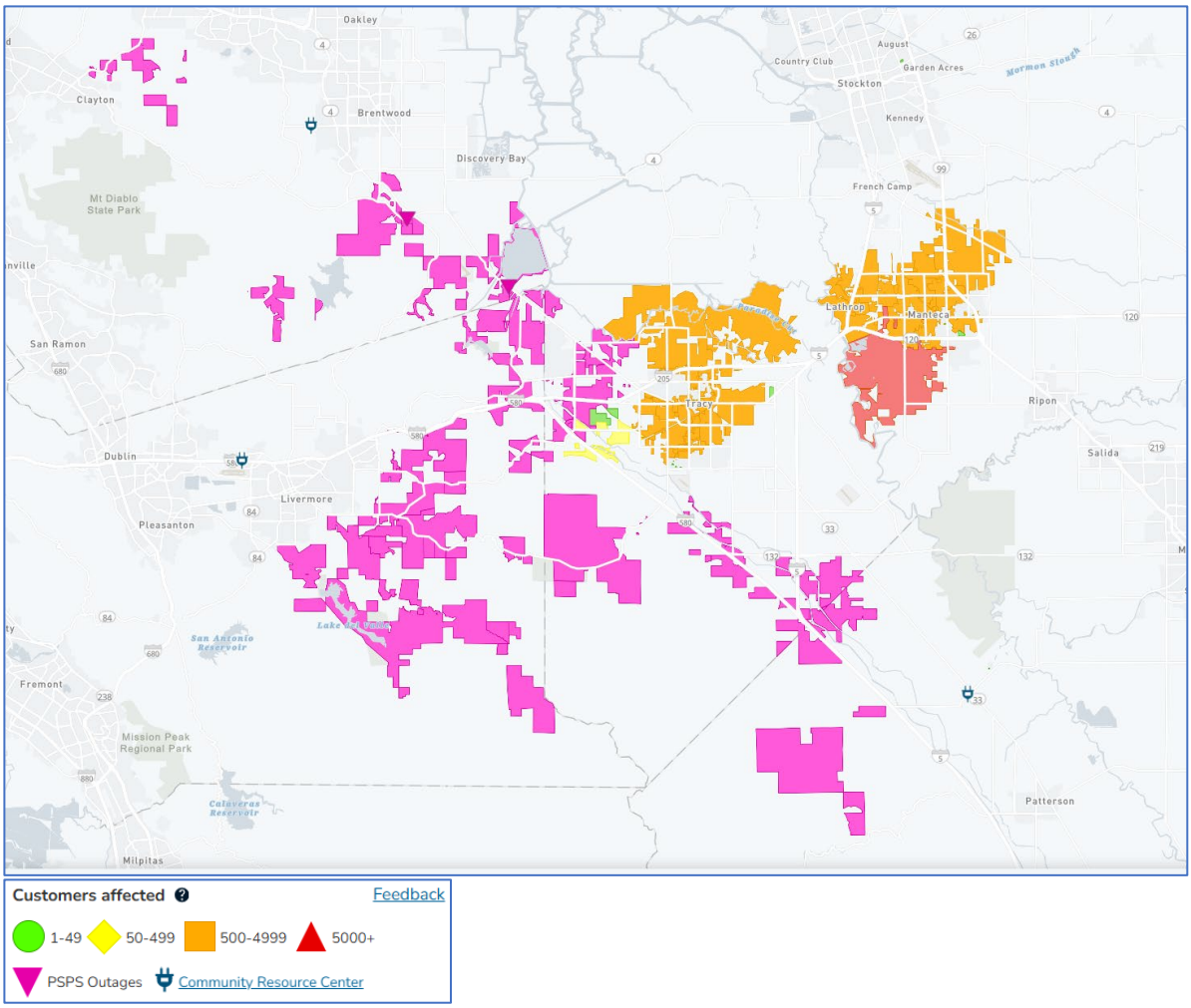
[20] PG&E 25-4 Post-Event Report at 5.

[21] *Power shutoffs and rolling blackouts collide in San Joaquin County,* Gabriel Porras, KXTV-TV Sacramento, June 20, 2025, available at https://www.msn.com/en-us/public-safety-and-emergencies/health-and-safety-alerts/power-shutoffs-and-rolling-blackouts-collide-in-san-joaquin-county/ar-AA1H7VD4?ocid=BingNewsVerp

[22] *Power shutoffs and rolling blackouts collide in San Joaquin County*, Gabriel Porraas, ABC10 news, June 20, 2025, available at https://www.abc10.com/article/news/local/power-shutoffs-rolling-blackouts-collide-san-joaquin-co/103-cf2ce4c0-1848-455d-8195-3919ba9c26ca

[23] *Power shutoffs and rolling blackouts collide in San Joaquin County,* Gabriel Porras, KXTV-TV Sacramento, June 20, 2025, available at https://www.msn.com/en-us/public-safety-and-emergencies/health-and-safety-alerts/power-shutoffs-and-rolling-blackouts-collide-in-san-joaquin-county/ar-AA1H7VD4?ocid=BingNewsVerp

Figure 1. PG&E's outage map for June 19, 2025 showing thousands of customers affected by "grid emergency" (red and orange polygons) compared to de-energizations labeled as "PSPS Outages" (purple polygons).[24]



B. SED should investigate PG&E for its failure to issue required notifications to at least 30 critical facilities prior to de-energization.

IOUs are required to issue 48-to-72 hour, 24-to-48 hour, and 1-to-4-hour imminent notifications, as well as de-energization initiation, re-energization, and event conclusion notifications.[25] However, PG&E failed to issue notifications to at least 30 CFI customer accounts within the one-

[24] PG&E's Outage Map, PG&E, accessed on June 19, 2025, available at https://pgealerts.alerts.pge.com/outage-tools/outage-map/

[25] The Commission's notification timeline requirements for 48 to 72 hour, 24 to 48 hour, and 1-to-4-hour imminent notifications, as well as de-energization initiation, re-energization, and event conclusion are set forth in D.19-05-042 at A8-A9.

to-four hour window.[26] PG&E lists human error and weather forecasting issues as the primary causes of these 30 missed notifications.[27] Resolution WSEB-1 authorizes SED to penalize IOUs for missed PSPS notifications.[28]

Advanced notifications of PSPS events for CFIs are critical to provide necessary support for impacted customers, including vulnerable populations.[29] For example, East Bay Municipal Utility District (EBMUD) states on its website, "with advance notice of a PSPS event from PG&E, EBMUD can shift electrical loads and prepare onsite generators to ensure safe treatment and discharge of wastewater."[30] Notifications to critical facilities of PSPS events are therefore crucial to implement PSPS events as safely as possible.

PG&E should have systems in place to streamline notifications to CFIs. SED should investigate how many times PG&E failed to issue notifications to CFIs during the 25-4 PSPS Event, and where appropriate apply penalties.

C. SED should investigate PG&E for its improper reporting of sustained wind speed thresholds for PSPS activation

PG&E's 25-4 Post Event Report fails to explain how PG&E implements PSPS events based on sustained wind speeds. PG&E is required to demonstrate that the risk of catastrophic wildfire outweighs the harm caused to customers by losing power in a PSPS event.[31] SED's Post-Event Report Template,[32] lays out the reporting requirements for the IOUs' PSPS post-event reports, including decision making criteria.[33] Specifically, "criteria and detailed thresholds leading to de-energization including the latest forecasted weather parameters versus actual weather"[34] must be

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[26] PG&E 25-4 Post-Event Report at 68.

[27] PG&E 25-4 Post-Event Report at 71.

[28] Commission *Resolution WSEB-1*, September 21, 2023 at B-1.

[29] *See* D.19-05-042 at C2, D.20-05-051 at A10, D.21-06-034 at A5-A6. CFIs are facilities and infrastructure that are essential to the public safety and that require additional assistance and advance planning to ensure resiliency during de-energization events. These include police stations, fire stations, medical facilities, public and private utilities, senior centers, homeless shelters, tribal government providers, transportation sector.

[30] EBMUD deploys equipment to ensure reliable water delivery during public safety power shutoffs, East Bay Municipal Utility District, September 25, 2020, available at https://www.ebmud.com/about-us/news/press-releases/ebmud-deploys-equipment-ensure-reliable-water-delivery-during-public-safety-power-shutoffs-2

[31] D.19-05-042 at A24.

[32] *Template for Public Safety Power Shutoff (PSPS) Post-Event and Lessons Learned Report Decision,* Safety and Enforcement Division of the Commission, October 2021 (SED's Post-Event Report Template)

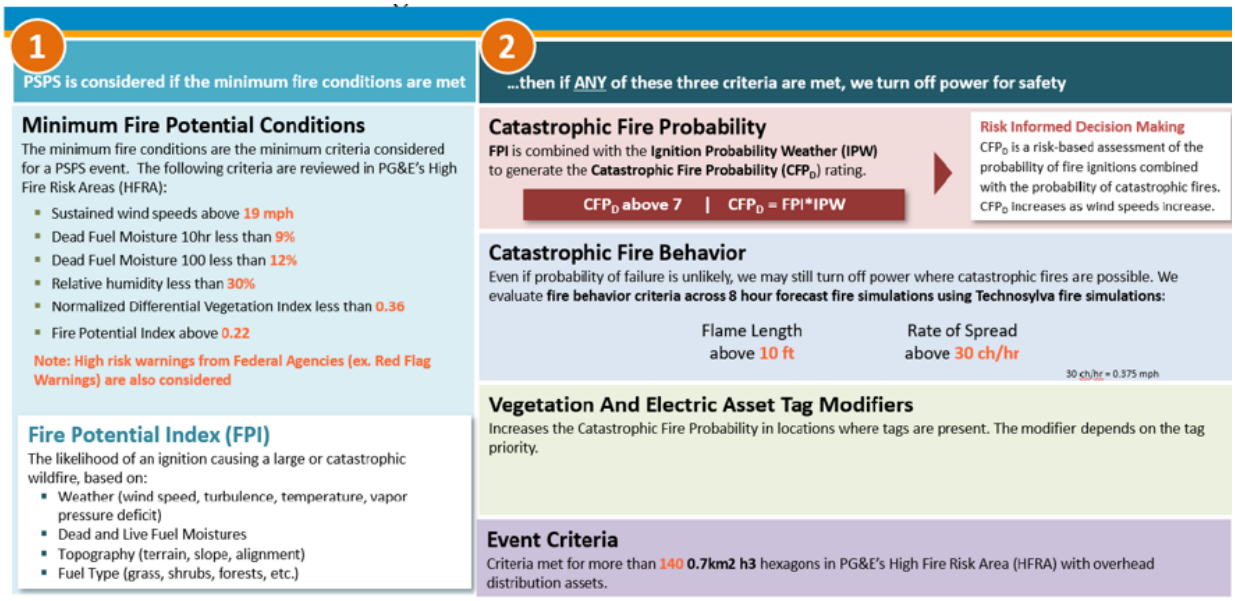
[33] SED's Post-Event Report Template at 4.

[34] SED's Post-Event Report Template at 4.

reported.[35] PG&E has repeatedly reported that its PSPS threshold for sustained wind speeds is 19 mph.[36]

Figure 2 below provides PG&E's PSPS decision-making criteria for de-energization during high winds. Table 1 summarizes Cal Advocates' analysis of PG&E's data of de-energizations and windspeeds from the MesoWest[37] website. The discrepancy between the PG&E's reported de-energization threshold and available third-party data requires further investigation. For example, Figure 2 shows that the windspeed threshold for a PSPS event is sustained wind speeds above 19 miles per hour (mph). However, Table 1 shows that PG&E de-energized the Cottonwood distribution line at a maximum sustained windspeed of 10.7 mph. As shown in Table 1, 80% (or 12) of the 15 circuits listed in Table 1 that were de-energized did not meet the 19 mph sustained wind speeds (highlighted in red and orange in Table 1). Indeed, more than half (8 of 15) of the circuits' nearest weather stations did not even exceed 11 mph sustained wind speeds (highlighted red in Table 1).

Figure 2. PG&E's PSPS Protocols for Distribution circuits.[38]



[35] See D.19-05-042 at A22 and D.21-06-014 at 284.

[36] See, e.g., PG&E 25-4 Post-Event Report at 11.

[37] MesoWest is a weather station data aggregator run by the University of Utah. Most of the data used in this document are reported from PG&E weather stations.

[38] PG&E 25-4 Post-Event Report at 11.

Although PG&E lists a sustained wind speed threshold of 19 mph,[39] as demonstrated in Figure 2, it still de-energized circuits that only had a maximum sustained wind speed below 11 mph while de-energized, as demonstrated in Table 1. Since PG&E did not explain why it did not apply its own minimum de-energization criteria in this PSPS event, it remains unclear how PG&E makes the decision to de-energize customers.

PG&E's wind gust[40] thresholds are also unclear. In PG&E's 25-4 Post-Event Report, PG&E makes no mention of wind gust thresholds. However, according to a document published by PG&E in 2024,[41] PG&E uses a wind gust threshold of 25-40 mph to determine when to de-energize. As shown in Table 1, many de-energized circuits did not achieve a peak wind gust of 25 mph. The difference between PG&E's published wind gust thresholds and actual wind gusts further demonstrates that PG&E is not properly reporting its PSPS determination thresholds.

SED should investigate PG&E's insufficient post-event reporting[42] and the large discrepancy between reported thresholds and windspeeds. In addition, SED should direct PG&E to file future pre-season, post-season, and post-event reports with accurate wind speed thresholds and explanations of how the sustained windspeeds and gusts impacted PG&E's reported protocol.

[39] See, e.g., PG&E 25-4 Post-Event Report at 11.

[40] "The speed of the gust will be the maximum instantaneous wind speed." National Weather Service Glossary, available at https://forecast.weather.gov/glossary.php?word=gust

[41] *Public Safety Power Shutoff Policies and Procedures – Emergency Managers*, Pacific Gas and Electric Company, 2024, available at https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/psps-policies-and-procedures-emergency-managers.pdf

[42] SED's Post-Event Report Template.

Table 1: PG&E's de-energized circuits with the most customer accounts for its June 19-22, 2025 event with maximum sustained wind speeds at or below 11 mph highlighted in red and below 19 mph in yellow.

	Customer accounts de-energized	Closest weather station to substation	Maximum wind gust over de-energization period (mph)	Maximum sustained wind speed over de-energization period (mph)	Minimum relative humidity over de-energization period (%)
Oilfields 1103	2446	421PG	40.3	26.3	20.1
Cottonwood 1103	894	251PG	25	10.7	26
Elk Creek 1101	817	PG574	37.6	22.1	19
Herdlyn 1102	802	KC83	52.9	42.6	24
Tyler 1105	751	PG755	32.5	18.1	22
Oregon Trail 1103	634	PG516	19.6	10.2	21
Girvan 1102	590	103PG	25.1	9.6	11
Keswick 1108	524	306PG	33.2	16	14
San Miguel 1107	501	PG960	30	17.8	15
Oregon Trail 1102	497	PG516	19.6	10.2	21
Tejon 1102	490	612PG	19.5	10.7	22
Vasco 1102	480	G2871	23	11	33
San Ardo 1102	439	023PG	28.6	17.3	22
Cottonwood 1101	421	251PG	25	10.7	24
Soledad 2101	396	G2755	19	8	46

III. CONCLUSION

Cal Advocates recommends that SED consider the above issues and recommendations when evaluating future policy updates and PG&E's compliance with the Commission's de-energization and Post-Event Report rules, guidelines, and regulations.

In its Post-Event Report:

- PG&E alludes to a grid emergency that was concurrent, and adjacent to the PSPS event. but the report fails to provide detailed discussion of the relationship between the two events;
- PG&E failed to notify at least 30 critical facilities in the one to four hour window before de-energization; and
- PG&E de-energized circuits that had maximum sustained wind speeds far below PG&E's 19 mile per hour threshold.

For these reasons, SED should investigate PG&E's performance for this event, determine whether PG&E was in compliance and, where appropriate, consider remedies for PG&E's poor performance.

Sincerely,

/s/ ARTHUR "IAIN" FISHER
Arthur "Iain" Fisher, PhD
Program Manager, Safety Branch
Public Advocates Office

cc: Service List: R.18-12-005