

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Update Rules
for the Safety, Reliability, and Resiliency of
Electrical Distribution Systems.

R.24-05-023
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**COMMENTS OF THE CITY AND COUNTY OF SAN FRANCISCO
ON PROPOSED CUSTOMER RELIABILITY REPORT TEMPLATE**

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COMMENTS OF THE CITY AND COUNTY OF SAN FRANCISCO ON PROPOSED CUSTOMER RELIABILITY REPORT TEMPLATE

The City and County of San Francisco (San Francisco or City) respectfully submits these comments on the Joint IOU's Proposed Customer Reliability Report Template (Report Template), pursuant to the August 22, 2025 *Assigned Commissioner and Administrative Law Judge's Ruling Modifying Track 1 Schedule of Activities*, and October 27, 2025 Administrative Law Judge Rizzo's E-mail Ruling, which modified the schedule for Track 1 and extended the deadline to submit these opening comments. The Ruling invites parties to comment on the Template and respond to specific questions set forth in the Ruling.

The City appreciates the Commission's effort in developing a reporting template that streamlines the information on electric service reliability, consistent with the goals of this proceeding to establish a foundation for measuring utility outages. However, in the near-term, the Commission should more promptly address ongoing concerns related to outage communications. Customers continue to experience significant and disruptive outages, including PG&E's outages last month that affected 130,000 customers in San Francisco. The City and customers throughout the City cannot wait for development of a reporting template and a subsequent review process to resolve these growing concerns. The City urges the Commission to take further and prompt action to address urgent outage issues that are affecting customers in real time.

San Francisco provides the following responses to Questions 1, 4, and 5 of the Ruling.

1. Is the scope of data the Joint IOUs are required to submit via their Customer Reliability Report reasonable? What, if any, enhancements should the Commission consider to improve the transparency of the data presented in the Customer Reliability Report?

San Francisco emphasizes the need to ensure the Template promotes transparency and meaningful outage data, which includes allowing stakeholders sufficient access to data in the Customer Reliability Report (Report). The IOUs propose to "protect all data deemed confidential" in the submitted report without specifying which data they expect to keep confidential. The IOUs should identify which data they propose to keep confidential in advance of submitting the Report and the Commission should require a non-disclosure agreement

between the IOU(s) and any party seeking to access the Report. This would improve the transparency of data while balancing customer privacy requirements.

In addition, the IOUs propose an aggregated and narrative format for customer outage notification data in the Report Template. This allows for broad discretion by the IOUs to curate information and prevents meaningful evaluation of whether an IOU's notification framework is effective for different customer segments. The Ruling sets forth the guiding principle that data regarding notifications and communication should be segmented by geography, demographics, and equity-focused metrics.¹ The Report Template should be further refined to include disaggregated data on notifications rather than simply a narrative description on the types of notification disseminated by the utility.

Further, notifications to customers via the sources used to date (*e.g.*, text messaging and online outage maps) are frequently proven to be inaccurate as to expected duration of the outage and restoration time. For example, customers are notified that power has been restored when it has not, or the expected time for restoration is significantly different from the actual restoration time. Accurate and timely information on the expected duration of outages is particularly important for the City's Critical and Essential customers, who require prioritized communication and restoration to avoid disruption to emergency and medical services and impacts on public health and safety.² The Commission should require a metric that measures accuracy of information, such as the amount of time discrepancy between the notified restoration time and the actual restoration time. This would inform the Commission and utilities about needed improvements in outage management and communication protocols.

4. Do the proposed requirements for future Customer Reliability Reports sufficiently capture the data needed to aid the Commission's understanding of whether there are patterns of outages that disproportionately affect tribal governments, rural, disadvantaged, and/or low-income communities?

¹ Ruling at 3 ("1. Any submitted Customer Reliability Report must explain how customers are notified and communicated with before, during, and after planned and unplanned outages; 1.1. The data supporting such explanations should be segmented based on customer attributes such as the geographic, demographic, and equity focused metrics as established in the Defining Units of Analysis.")

² San Francisco Comments on ALJ Ruling Regarding Data Definition and Guidelines Enhancements, (December 13, 2024), p. 4; San Francisco Comments on OIR (July 8, 2024), pp. 2, 5.

To better understand patterns and trends over time, reports should present data for previous years as compared to the reporting year. For example, for the first report submitted in 2026, the IOUs should include data from the past five years, where appropriate, to reflect recent patterns and trends. Presenting data over time allows a cumulative review of a utility's outage management and communication processes, including how they may disproportionately impact certain communities.

5. Are there any modifications or other considerations the Commission should consider when evaluating the Joint IOUs' draft Customer Reliability Report Template?

Evaluating the template for its effectiveness is challenging absent clarity regarding how the Commission plans to use the reported information. While the City supports developing a more streamlined reporting framework, the reports should not be prepared as a perfunctory exercise that produces information without informing decisions or driving action. The Commission should provide additional clarity regarding how this data will be evaluated and inform actions to address safety, reliability, and resiliency.

Dated: January 9, 2026

Respectfully submitted,

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