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 |
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# COMMENTS OF THE PUBLIC ADVOCATES OFFICE ON SAN DIEGO GAS & ELECTRIC COMPANY'S OCTOBER 2 TO 4, 2026 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 the San Diego Gas & Electric Company's (SDG&E's) Public Safety Power Shutoff (PSPS) Report to the California Public Utilities Commission (CPUC), October 2 to 4, 2026 De-energization Event (Post-Event Report). 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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November 2, 2026

[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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November 2, 2026

**Via Electronic Mail**

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**Re: Public Advocates Office's Comments on SDG&E's Public Safety Power Shutoff Report to the CPUC, October 2 to 4, 2026 De-energization Event**

Director Tomassian:

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 San Diego Gas & Electric Company's (SDG&E's) Public Safety Power Shutoff (PSPS) Report to the CPUC, October 2 to 4, 2026 De-energization Event (Post-Event Report).

SDG&E failed to comply with California Public Utilities Commission (Commission) requirements for implementing and reporting PSPS events and must improve its PSPS operations and reporting on several issues. The Safety and Enforcement Division (SED) and the Commission should take steps to ensure that SDG&E complies with Commission rules and conducts PSPS events with minimum risk to the public.

[1] See *Decision Adopting De-Energization (Public Safety Power Shut-Off) Guidelines (Phase 1 Guidelines),* issued June 4, 2019 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,* issued 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*, issued June 7, 2021 at 236. Parties must file comments in response to 10-day reports in R.18-12-005.

## BACKGROUND

On September 30, 2026, SDG&E identified incoming potentially dangerous fire weather and activated its Emergency Operations Center (EOC) to manage the event. On the morning of October 2, 2026, SDG&E initiated de-energization on one circuit in San Diego County, which affected 18 customer accounts, including one Medical Baseline (MBL) customer account and no critical facilities.[3] SDG&E restored power to all customers by 1:57 pm on the same day.[4] SDG&E submitted its Post-Event Report on October 16, 2026.

Resolution ESRB-8,[5] D.19-05-042, D.20-05-051,[6] D.21-06-014, and D.21-06-034[7] establish de-energization guidelines for the investor-owned utilities' (the IOUs)[8] planning and execution of de-energization events.[9] Cal Advocates analyzed whether SDG&E's Post-Event report adhered to these de-energization guidelines, and identified the deficiencies discussed below:

- SDG&E failed to include a complete version of Table 5-2 in the PDF version of its Post-Event Report.
- SDG&E failed to adequately explain its notification failures.

To rectify the issues present in SDG&E's Report, Cal Advocates makes the following recommendations to SED:

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[3] *San Diego Gas & Electric Company Public Safety Power Shutoff (PSPS) Report to the CPUC October 2 – October 4, 2026 De-energization Event*, October 16, 2026 (SDG&E PSPS October 2 to 4, 2026 Post-Event Report) at 3.

[4] SDG&E October 2 to 4, 2026 PSPS Post-Event Report, Table 3-1.

[5] *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 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."

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

[7] *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.

[8] 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 de-energization events.

[9] 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.

- SED should direct SDG&E to revise and resubmit its Post Event Report for its October 2 to 4, 2026 PSPS Event.

## DISCUSSION

### A. SED should direct SDG&E to revise and resubmit its October 2 to 4, 2026 PSPS Event Report due to missing information

SDG&E did not include the full version of Table 5-2: Breakdown of Notification Failures in the narrative PDF of its PSPS Post-Event Report.[10] The current version of SDG&E's Table 5-2 omits most information about missed notifications to Critical Facilities and Infrastructure and all information about "All other affected customers." This omission makes a stakeholder assessment of SDG&E's notification performance more difficult. SDG&E is required to provide this information in its PSPS Post-Event Report PDFs pursuant to SED's PSPS Post-Event Report Template (Updated March 2026).[11] However, Cal Advocates notes that a complete version of the table was included in SDG&E's companion Excel dataset to the report. Cal Advocates recommends that SED require SDG&E to refile its report to fix the omitted information in Table 5-2 in the PDF version of the report and ensure it matches with the information in the companion PSPS dataset.

### B. SED should require SDG&E to revise and resubmit its October 2 to 4 PSPS Event Report with an explanation of what caused its notification failures during the October 2 to 4, 2026 PSPS Event

SDG&E does not explain why it did not send 1–4 hour imminent notifications to Public Safety Partners, nor does it provide an explanation of how it plans to correct the notification failures in future PSPS events. Under the "Explanation" field of Table 5-2: Breakdown of Notification Failure, SDG&E merely states that "a 1–4 hour notification was not sent to Public Safety Partners" with no further analysis or context on why the error occurred.[12] This error resulted in 151 Public Safety Partners not receiving a 1-4 hour "PSPS imminent" notification.

SDG&E is required to "explain how the utility will correct the notification failures."[13] Given that SDG&E did not provide any explanation of what caused the notification failures, let alone how it plans to fix them, SED should find SDG&E's Post-Event report non-compliant with PSPS reporting requirements.

[10] SDG&E's Post-Event Report for its October 2 to 4, 2026 PSPS Event at 35.

[11] SED's Post-Event Report Template (March 2026) cites D.21-06-014 at 286 and "SED Additional Information" as the basis for this requirement.

[12] SDG&E's Post-Event Report for its October 2 to 4, 2026 PSPS Event at 35-36.

[13] D.21-06-014 at 286.

Cal Advocates recommends that SED direct SDG&E to revise and resubmit its October 2 to 4, 2026 PSPS Post-Event report with the missing information included. If SDG&E does not resubmit its report with an explanation of why Public Safety Partners did not receive a 1-4 hour "imminent" notification, SED should pursue fines against SDG&E pursuant to the PSPS citation methodology established by Resolution WSEB-1.[14]

## CONCLUSION

SED should consider the above issues and recommendations when evaluating SDG&E's compliance with the CPUC's de-energization and Post-Event Report rules, guidelines, and regulations.

In its Post-Event Report, SDG&E:

- Failed to include a full table of its notification failures required by D.21-06-014 and SED's PSPS Post-Event Report Template.
- Failed to provide any explanation as to why 151 Public Safety Partners did not receive a 1-4 hour imminent notification
- Failed to explain how SDG&E will correct the notification failures.

For these reasons, SED should conclude that this event and its accompanying report is not in compliance with Commission requirements. SED should require SDG&E to resubmit its Post-Event Report with the corrections described in these comments.

Sincerely,

/s/ **IAIN FISHER**
Iain Fisher, PhD

Program Manager, Safety Branch
Public Advocates Office

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

[14] Resolution WSEB-1 at 14: "[The Commission] find(s) that missing a notice is an objective fact and we delegate to Commission Staff the discretion to determine whether to pursue and calculate an appropriate penalty."