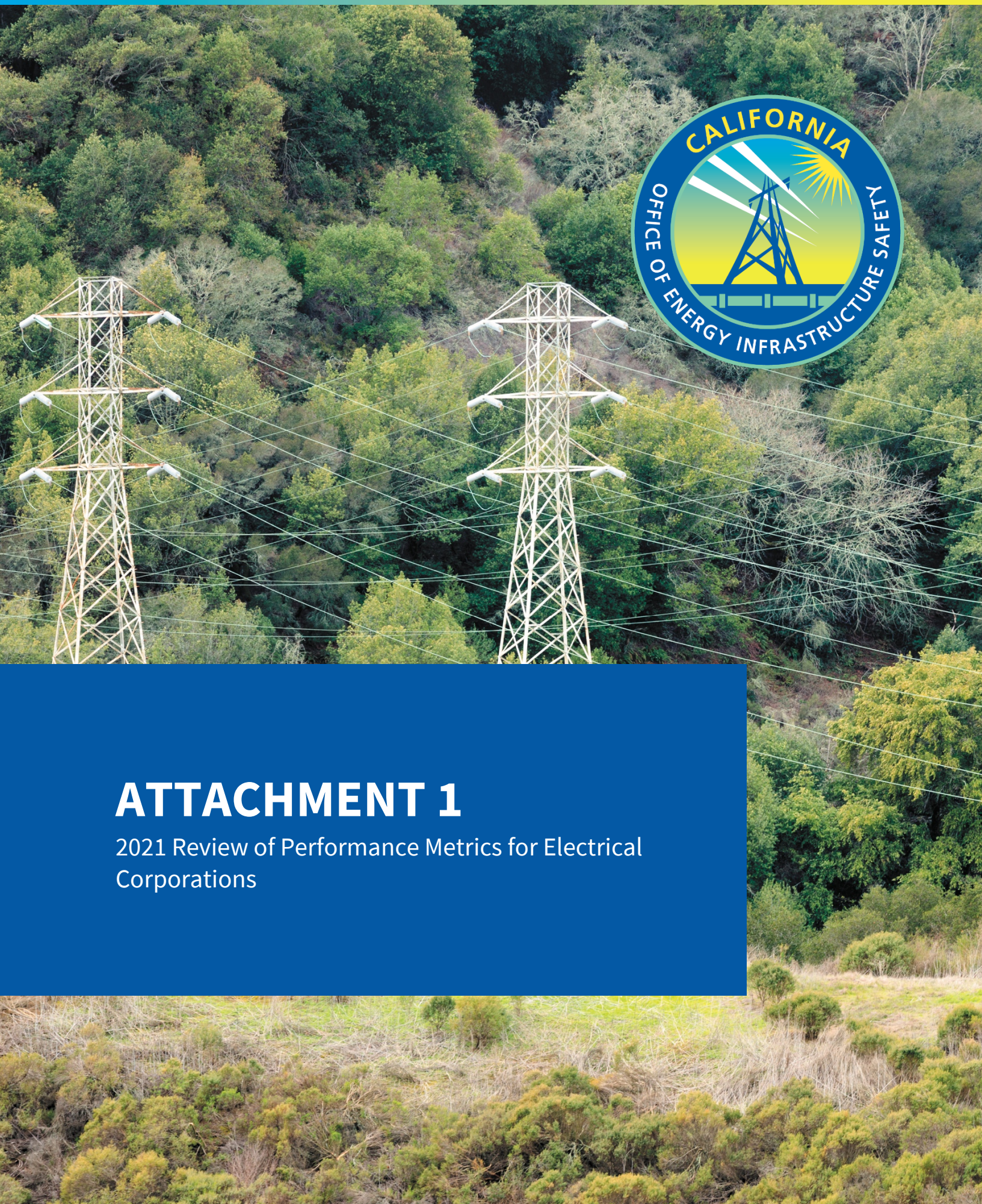
ATTACHMENT 1

Energy Safety's Review of Performance Metrics



ATTACHMENT 1

2021 Review of Performance Metrics for Electrical Corporations

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INTRODUCTION

Public Utilities Code (Pub. Util. Code) § 8389(d) requires the California Public Utilities Commission (Commission), after consultation with the Office of Energy Infrastructure Safety (Energy Safety),[1] to adopt and approve the following:

1. Performance metrics for electrical corporations.
2. Additional requirements for wildfire mitigation plans.
3. A wildfire mitigation plan compliance process.
4. A process for the division to conduct annual safety culture assessments for each electrical corporation.

This document constitutes Energy Safety's consultation regarding Pub. Util. Code § 8389(d)(1), performance metrics for electrical corporations.

[1] Pursuant to Public Utilities Code Section 326(b), on July 1, 2021, the WSD transitioned from the Commission into the Office of Energy Infrastructure Safety under the California Natural Resources Agency. Energy Safety "is the successor to" and "is vested with all of the duties, powers, and responsibilities of the Wildfire Safety Division" (Government Code Section 15475). WSD is used to describe the work of the Wildfire Safety Division prior to July 1, 2021. Energy Safety is used to describe the work of Energy Safety beginning on July 1, 2021. Any references to WSD action post July 1, 2021, or to Energy Safety action prior to July 1, 2021, are inadvertent and should be interpreted as the actions of WSD or Energy Safety as appropriate.

RECOMMENDATIONS

Review of WSAB's Performance Metrics Recommendations

Review of WSAB's Performance Metric Recommendations

On June 25, 2021, the Wildfire Safety Advisory Board (WSAB or the Board) posted its Revised Draft Recommendations on the 2022 Wildfire Mitigation Plan (WMP) Guidelines, Performance Metrics, and Safety Culture Assessment. Energy Safety reviewed these recommendations and herein provides its response to the Board's recommendations on performance metrics. Energy Safety will provide a complete analysis of the additional WSAB recommendations, pursuant to Pub. Util. Code § 8389(c),[2] under separate cover.

Section 6 of the WSAB's Revised Draft Recommendations contains three recommendations pertaining to communication and community outreach performance metrics. Energy Safety's response to each is as follows:

1. The 2022 WMP Guidelines should utilize the PSPS reporting framework established in the most recent decision in I.19-11-013.

The WSAB recommends incorporating the outcomes of Investigation (I.)19-11-013[3] and Rulemaking (R.)18-12-005[4] (the PSPS proceedings) into the 2022 WMP Guidelines. Decision (D.)21-06-014[5] in I.19-11-013 does not establish a specific PSPS reporting framework, but rather directs utilities to undertake actions, including corrective actions, to "address the failures of PG&E, SCE, and SDG&E to reasonably protect the public and adhere to state law and the Commission's rules and regulations pertaining to proactive power shutoffs used as a wildfire mitigation measure."[6] The WSAB recommends that these outcomes be incorporated "in a manner that reveals the extensive range of activities already in place but does not force the utilities to replicate the level of detail in other compliance findings."[7]

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[2] Pub. Util. Code § 8389(c) By October 31, 2020, and annually thereafter, the division shall issue an analysis and recommendation to the commission on the recommendations provided by the board pursuant to subdivision (b).
Investigation 19-11-013: Order Instituting Investigation on the Commission's Own Motion on the Late 2019 Public Safety Power Shutoff Events, November 13, 2019.

[3] Investigation 19-11-013: Order Instituting Investigation on the Commission's Own Motion on the Late 2019 Public Safety Power Shutoff Events, November 13, 2019.

[4] Rulemaking 18-12-005: Decision Adopting Phase 3 Revised and Additional Guidelines and Rules for Public Safety Power Shutoffs (Proactive De-Energizations) of Electric Facilities to Mitigate Wildfire Risk Caused by Utility Infrastructure, May 21, 2021.

[5] Decision 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 (2021)
https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M387/K099/387099293.PDF

[6] Decision (D.)21-06-014, pp. 2-3.

[7] The WSAB Revised Draft Recommendations on the 2022 Wildfire Mitigation Plan (WMP) Guidelines, Performance Metrics, and Safety Culture Assessment, p. 22.

Energy Safety is not proposing incorporating these changes in its 2022 WMP Update Guidelines. Energy Safety needs more time to effectively collaborate with the Commission to determine whether any outcomes or required actions specified in D.21-06-014 or in other PSPS-related proceedings will be useful performance metrics to include in future WMP Guidelines. Energy Safety also plans to collaborate with the Commission to determine the appropriate level of detail for any additional performance metrics related to the PSPS reporting framework would reveal the extensive range of activities already in place without replicating the level of detail in other compliance filings.

2. The 2022 WMP Guidelines should require the utilities to include an analysis of the correlation between the quantity of [PSPS] contacts and effectiveness of the outreach methods.

The primary purpose and authority of Energy Safety is to ensure electrical utilities are taking effective actions to reduce utility-related wildfire risk and to prevent catastrophic utility-ignited wildfires. A utility's stakeholder outreach, including providing proper and adequate PSPS notification to affected populations, is an important component of public safety. However, Energy Safety's mission is related to improving utility wildfire safety, and not specially to stakeholder outreach. Energy Safety's intent is for utilities reduce PSPS scale, scope, and frequency with a goal of eliminating need for PSPS. This WSAB recommendation relates to the effectiveness of utility outreach methods, and therefore falls more appropriately under the Commission's separate PSPS authority than the WMP Guidelines.

3. The WSD should request the utilities submit their internal evaluation methodology for their outreach efforts. Based on this information the 2022 WMP Guidelines should include additional performance metrics to measure the success of community outreach efforts.

As discussed above, this WSAB recommendation relates to the effectiveness of utility outreach methods, and therefore falls more appropriately under the Commission's separate PSPS authority than the WMP Guidelines. The Commission is currently examining utility PSPS procedures in R.18-12-005 (Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions) and related proceedings.

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