

December 13, 2019



To: Elizaveta Malashenko
Deputy Executive Director, Safety and Enforcement
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

From: Megan M. Myers, Attorney for the California State Association of Counties

RE: **Pacific Gas and Electric Company's Public Safety Power Shutoff Report to the CPUC
October 26 & 29, 2019 De-Energization Event**

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Dear Ms. Malashenko:

The California State Association of Counties (CSAC) submits this Response to Pacific Gas and Electric Company's (PG&E's) Public Safety Power Shutoff (PSPS) Shutoff Report for October 26 and 29, 2019 de-energization events. The Report was submitted to the California Public Utilities Commission (Commission) on November 18, 2019. This Response is timely submitted pursuant to the Letter from Alice Stebbins, Executive Director of the Commission, dated November 8, 2019 and pursuant to Commission Rules of Practice and Procedure, Rule 16.6.

Description of CSAC

CSAC is a nonprofit mutual benefit corporation under the California Nonprofit Mutual Benefit Corporation Law. CSAC is a lobbying, advocacy and service organization which represents all 58 counties of the State of California. CSAC is focused on advancing the vital public interest in effective, efficient and responsive local government. CSAC, under the name the County Boards of Supervisors Association of California, began meeting in 1895 and was later renamed CSAC in 1991 and is based in Sacramento, California. CSAC's long-term objective is to significantly improve the fiscal health of all California counties so they can adequately meet the demand for vital public programs and services.

Background and General Concerns

On October 26 and 29, 2019, PG&E had two PSPS events which came after numerous PG&E PSPS events in the month of October 2019. These events impacted many of the people located within counties in PG&E's service territory.

CSAC has been actively participating in the Commission de-energization proceeding (R.18-12-005). CSAC has consistently argued that the current PSPS implementation transfers too much risk, responsibility and cost to local governments. CSAC is also concerned that these events are not being used as a last resort and that they are not considered by the Commission or PG&E to be emergency events. Below, CSAC discusses specific concerns it had during the October 26 and 29, 2019 PG&E PSPS Events and concerns about PG&E's PSPS Report.

Failure of PG&E to Adequately Consider the Impacts on Local Government

When the IOUs notice a PSPS event, the local governments spend a significant amount of time and resources to prepare for something that may or may not occur. The local governments have to make determinations about allocations of scarce resources during these events. As such, it is troubling to CSAC that these events are not being treated as disasters or emergencies given the large amount of resources spent preparing for these events. Furthermore, CSAC is concerned that PG&E is not fully considering the impact these events have on the people located in the affected counties.

Furthermore, all routine business stops when a PSPS event is announced. The PSPS has significant downstream effects on normal daily and business operations for any emergency services organization. This is just one area where counties are affected when PSPS events are notified, whether they occur or not.

PSPS Information Made Available to the Public Was Not Accurate or Easily Accessible

Another overarching complaint against PG&E during these PSPS events is that the information that PG&E made available to the public was not accurate or easily accessible. The PG&E address look-up feature was not accurate – some residences and buildings were listed as being affected when they were not, and vice versa. In addition, PG&E should provide clarification on the buffer zone – if this zone is in fact a potential PSPS event area than indicate it as such instead of merely adding an additional mile in every direction.

PG&E should also identify the number of lines down in each county after each event. If a PSPS event is making a difference in preventing fires from starting, then PG&E should provide that data and the specific location information.

Furthermore, PG&E should be aware of all maintenance or unscheduled power outages occurring in areas adjacent to the PSPS in its service territory. For example, in Fresno County, PG&E had populated areas that were also without power due to a scheduled maintenance by PG&E. PG&E Staff coordinating with Fresno County on the PSPS seemed unaware of the additional areas without power.

Lastly, the detail of the PSPS maps shared by PG&E was not sufficient to determine the actual boundaries of the PSPS event. PG&E should provide all circuit maps and areas of coverage to County Emergency Services with a non-disclosure agreement.

PG&E's PPS Report Fails to Mention Specific Events Experienced in Certain Counties

PG&E's PPS Report fails to mention specific events that were experienced in certain counties. For example, in Contra Costa County there was a significant wind and fire event and the PPS in this county was not wide enough. Contra Costa County experienced an overwhelming amount and severity of wildland fires and in some cases, the power lines that caused a significant series of fires were energized just outside the notified PPS zone.

Access to Cell Phone Outage Information is Critically Important

PG&E should provide better data regarding the impact the PPS events have on cell towers and whether there will be cell phone outages. If the counties know cell phone coverage is compromised, they will need to utilize additional resources to enable door-to-door communication.

Additional Recommendations

CSAC offers the following additional recommendations in response to this PSPS Report:

- Leadership from the Commission and PG&E should visit the remote and rustic areas of counties in PG&E’s Service Territory to familiarize themselves with the challenges that are being faced in these areas during PSPS events.
- PG&E needs to improve the quality and accuracy of information available to the public and emergency managers.
- During the re-energization, allow the County EOC to provide input for a priority to inspect first if it involves critical infrastructure.
- The issue of poor communication between PG&E and the local governments continues to be problematic. There is significant room for improvement in this area, particularly regarding inaccurate maps.

Respectfully submitted,

December 13, 2019

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cc: R.18-12-005 Service List