

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine Electric  
Utility De-Energization of Power Lines in Dangerous  
Conditions.

Rulemaking 18-12-005  
(Filed December 13, 2018)

**REPLY COMMENTS OF THE CALIFORNIA STATE ASSOCIATION OF COUNTIES  
ON THE ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENTS  
ON PROPOSED ADDITIONAL AND MODIFIED DE-ENERGIZATION GUIDELINES**

February 26, 2020

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The California State Association of Counties (CSAC) respectfully submits these Reply Comments on the Administrative Law Judge’s Ruling Requesting Comments on Proposed Additional and Modified De-Energization Guidelines (ALJ Ruling), issued in this Rulemaking (R.) 18-12-005 (De-Energization) on September 17, 2019. CSAC was granted party status in this proceeding on January 30, 2020. These Reply Comments are timely filed and served pursuant to the Commission’s Rules of Practice and Procedure and the ALJ Ruling.

**I.  
CSAC SHARES CONCERNS VOICED BY MULTIPLE PARTIES REGARDING THE  
NEEDS ASSESSMENT PLAN FOR MEDICAL BASELINE AND ACCESS AND  
FUNCTIONAL NEEDS (AFN) POPULATIONS**

The ALJ Ruling states that the electric investor-owned utilities (IOUs) shall collaborate with public safety partners, local governments, and AFN customer advocates to conduct a needs assessment which “shall identify current and unsubscribed medical baseline customers, what if any assistance is needed for these people during de-energization events, and an evacuation plan for these populations that specifies transportation and health care resources that can be provided to them.”<sup>1</sup> CSAC supports the statement made by the Counties of Kern, Marin, Mendocino, Napa, Nevada, San Luis Obispo, Santa Barbara, Sonoma and the City of Santa Rosa (the Joint

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<sup>1</sup> ALJ Ruling, Appendix 1, at p. 7.

Local Governments) that this needs assessment “appears to be a good starting point for reducing the impacts of PSPS events on AFN.”<sup>2</sup>

However, CSAC is concerned that many counties may not have the resources to perform this assessment. CSAC agrees with the Joint Local Governments that at least one of the aspects of the needs assessment plan may be problematic, specifically “[d]eveloping an evacuation plan for specific populations comprised of thousands of individuals with a wide variety of specific needs is not likely to be feasible – there are too many variables, including the footprint and duration of a given PSPS event.”<sup>3</sup>

As such, CSAC supports the Rural County Representatives of California (RCRC) and the County of Santa Clara that many of the aspects of the needs assessment plan should be undertaken by the IOUs, with input from the local governments and others.<sup>4</sup> Furthermore, CSAC agrees with RCRC and the County of Santa Clara that the needs assessment plan should identify not only medical baseline customers, but all AFN populations.<sup>5</sup>

Lastly, CSAC supports the recommendation made by the Joint Local Governments that stakeholders and IOUs should do the following:

[D]evelop a robust information-sharing process to identify the existing resources and agencies in a particular area, understand the limitations on those resources, identify additional resources and agencies that can provide assistance, and ensure that AFN populations know what resources are available and how to access them.<sup>6</sup>

Likewise, CSAC agrees with the Joint Local Governments’ recommendation that “monthly and annual reporting requirements should also be adopted.”<sup>7</sup>

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<sup>2</sup> Opening Comments of the Joint Local Governments, at p. 19.

<sup>3</sup> *Id.*, at p. 19.

<sup>4</sup> Opening Comments of RCRC, at pp. 8-11 and Opening Comments of the County of Santa Clara, at p. 8.

<sup>5</sup> Opening Comments of RCRC, at pp. 8-10 and Opening Comments of the County of Santa Clara, at p. 8.

<sup>6</sup> Opening Comments of the Joint Local Governments, at p. 19.

<sup>7</sup> *Id.*, at p. 19.

**II.  
MORE DETAILED INFORMATION MUST BE PROVIDED BY THE IOUS TO THE  
LOCAL GOVERNMENTS TO UNDERSTAND THE AREAS OF IMPACT.**

The ALJ Ruling required the electric IOUs to “conduct outreach to impacted communities to increase their level of participation and to plan the coordination for future de-energization events.”<sup>8</sup> Before and during de-energization events, there needs to be detailed information so that local emergency management can effectively understand the area of impact and the exact addresses being impacted by the public safety power shutoff (PSPS) event. In addition, CSAC agrees with the Joint Local Governments that the “proposed de-energization roadmaps should, if adopted, provide public safety partners and the public with information that will inform local and individual resiliency planning, which will ultimately help reduce the impacts of PSPS events.”<sup>9</sup> Furthermore, CSAC echoes the concerns shared by RCRC that “[l]ocal government officials and staff must also be able to trust that the information they are given is accurate and reliable.”<sup>10</sup>

**III.  
THE COMMISSION SHOULD MAKE ADDITIONAL MODIFICATIONS REGARDING  
SITUATIONS WHERE INTERNET, CELLULAR OR LANDLINE-BASED  
COMMUNICATIONS ARE LIMITED**

The ALJ Ruling requires the following:

In situations where internet, cellular, or landline-based communication services are limited, the electric investor-owned utilities should leverage, in coordination with the public safety partners, public alert systems, public radio broadcasts, and neighborhood patrols in de-energization event areas.<sup>11</sup>

CSAC agrees with the County of Santa Clara that there must be coordination between the IOUs and the communication utilities and that “[i]t is essential for local emergency managers to be

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<sup>8</sup> ALJ Ruling, Appendix 1, at p. 1.

<sup>9</sup> Opening Comments of the Joint Local Governments, at p. 20.

<sup>10</sup> Opening Comments of RCRC, at p. 5.

<sup>11</sup> ALJ Ruling, Appendix 1, at pp. 2-3.

notified of the areas without cellular coverage as it affects the methods that the emergency managers will use to alert and warn the public.”<sup>12</sup> The IOUs should closely coordinate with the counties if the IOUs wish to use that county’s public alert systems. CSAC urges that undue burden not be placed on the counties for these types of issues.

**IV.  
CONCLUSION**

CSAC appreciates the opportunity to submit these Reply Comments.

Respectfully submitted,

February 26, 2020

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<sup>12</sup> Opening Comments of the County of Santa Clara, at p. 6.