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**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

**NORTHERN CALIFORNIA POWER AGENCY
COMMENTS ON PG&E POST-PSPS EVENT REPORT FOR
OCTOBER 26 TO NOVEMBER 1, 2019**

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December 31, 2019

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

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**NORTHERN CALIFORNIA POWER AGENCY COMMENTS
ON PG&E POST-PSPS EVENT REPORT
FOR OCTOBER 26 TO NOVEMBER 1, 2019**

In accordance with Assigned Commissioner's Amended Phase 2 Scoping Memo and Ruling, dated December 19, 2019, the Northern California Power Agency (NCPA)¹ submits the attached comments on the PG&E Post-PSPS Event Report for October 26 to November 1, 2019. On February 8, 2019, NCPA filed comments on the Rulemaking Order, thereby becoming a party to the proceeding at that time.

Dated: December 31, 2019

Respectfully submitted,



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¹ NCPA's members include the cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, Shasta Lake and Ukiah, as well as the Bay Area Rapid Transit District, Port of Oakland, the Truckee Donner Public Utility District, and the Plumas-Sierra Rural Electric Cooperative.



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December 13, 2019

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Re: Northern California Power Agency Comments on PG&E Public Safety Power
Shutoff Report for October 26 to November 1, 2019 PSPS Event

Dear Mr. Palmer:

The Northern California Power Agency (NCPA)¹ and its members were directly and profoundly impacted by the two PG&E public safety power shut-off (PSPS) events that occurred between October 26 and November 1, 2019 (October 26 Event). In order to inform the Commission's review of PG&E's actions and aid in the refinement of PSPS procedures and protocols to help mitigate these impacts in the future, NCPA provides this response to PG&E's Post-PSPS Report for that event (October 26 Report). This response is timely filed pursuant to the extension authorized by Executive Director Stebbins on November 8, 2019.

NCPA's members are both *public safety partners* and operate *critical facilities*, as defined in California Public Utilities Commission (Commission) Decision 19-05-042 (Phase 1 PSPS Decision).² This is not the first PSPS event that has impacted NCPA and its member

¹ NCPA is a not-for-profit Joint Powers Agency established in 1968 to make joint investments in energy resources that would ensure an affordable, reliable, and clean supply of electricity for customers in its member communities. NCPA's 16 members include municipalities, a rural electric cooperative, a port, public transit district, and a public utility district. NCPA also provides services for other publicly owned entities, including the purchase, aggregation, scheduling, and management of electrical energy. NCPA's members include the cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, Shasta Lake and Ukiah, as well as the Bay Area Rapid Transit District, Port of Oakland, the Truckee Donner Public Utility District, and the Plumas-Sierra Rural Electric Cooperative.

² D.19-05-042, Appendix A; pp. A4, A6.

agencies, and on November 19, 2019, NCPA submitted comments on the October 9-12 PPS Event. Many of the issues and concerns that were identified in those comments were not resolved prior to the October 26 Event and continue to exacerbate the problems associated with power shut-offs. NCPA urges the Commission to review all of the responses submitted by parties to help inform not only an assessment of the reasonableness of PG&E's actions leading up to, during, and immediately following the October 26 PPS event, but just as importantly, to help inform the processes and procedures that should be utilized in future PPS events. The objective should be to not only create a system where we can minimize the number of PPS events overall, but also to mitigate the impacts on customers in those instances where a PPS event or fire-safety related outage is unavoidable and must be employed.

As this is not the first response NCPA has submitted to the Safety and Enforcement Division in reaction to a PPS event, NCPA does not want to reiterate all of the points that have previously been made. But it is worth noting that the biggest shortcomings in the PPS process that NCPA identified in its prior response – that is the need for PG&E to provide publicly owned utilities timely, accurate, and detailed information – continue to be problems even as this process has been carried out several times since then. Again, NCPA understands that de-energization decisions are not made lightly, but as the state moves towards its goal of reducing the total number of PPS events, more must be done to assess the utilities' de-energization processes to ensure that the public safety is best served by the PPS-event, and that includes closely evaluating the entire process – all the way through to full restoration.

I. Impact of the October 26 – November 1 PPS Event Directly on NCPA

As we have previously advised the Commission and the Safety and Enforcement Division, events that occur on PG&E's transmission AND distribution facilities directly impact NCPA and its members, some of which are dependent upon PG&E transmission lines to deliver power to their customers. During the October 26 Event, NCPA was in the unenviable and unique position of having been impacted by the PPS event in three distinct ways: NCPA POU member utilities lost all power when PG&E de-energized transmission lines serving them; NCPA's geothermal electricity generating facility was not able to deliver its renewable energy to the grid when a key transmission line was rendered inoperable during the PPS event; and one NCPA member utility lost all power right as the town was being evacuated due to the Kincaid Fire's encroachment into the city. This confluence of events significantly impacted NCPA's own operations as scheduling coordinator for its member utilities, as well as the operator of a generation facility. The impacts of these events extended well into the de-energization phase, and continue to affect NCPA's operations. In order to provide the Commission with the necessary context to understand the impacts that the loss of power had on NCPA and its member

agencies during the October 26 Event, we provide the following summary.

A. NCPA Geothermal Facilities

NCPA owns and operates two geothermal plants located in the Geysers region in the southwest portion of the steam field near the Lake County and Sonoma County lines. The plants were built in the 1980s and had an original generating capacity of approximately 200 megawatts (MW) with generation-ties that connect the facility to the PG&E high-voltage transmission system (Geysers #9 –Lakeville 230 kv and Geysers #12 – Fulton 230 kv). Declines in the steam field have reduced the generation capacity of the plants to approximately 100 MW today, although the delivery capacity of the generation ties remain at 200 MW.

Due to the Kincade Fire, NCPA geothermal facility operations were interrupted at approximately 9:15 p.m. on October 23, and NCPA essential staff evacuated the plant at 4 p.m. on October 24. On October 30, NCPA staff was given authorization from CalFire and local authorities to re-enter the facility, after close coordination with CalFire and local officials, and pursuant to all formal processes required of the agencies. A limited number of NCPA facilities staff were authorized to re-enter the plant; their primary objectives upon re-entry was to:

1. Implement protective measures for the facility, such as maintaining the health of the steam field to ensure the long-term viability of plant operations;
2. Assess the potential for the facilities to provide power generation to support local capacity requirements; and,
3. Inspect the facilities and assess damages to identify necessary repairs.

Based upon NCPA staff's assessment of the state of the power plants and steam field, NCPA staff began to take steps so that both plants would be ready to resume operation once called upon to support local capacity needs. NCPA conducted necessary inspections and subsequently determined that it was safe to resume power generation. With PG&E's decision to re-energize its Geysers #12 high-voltage transmission line, NCPA Geothermal Plant #2 resumed normal plant operations at approximately 12:30 am on November 5.

Unfortunately, NCPA Geothermal Plant #1, which has also been generation ready since November 5, has been unable to resume normal operations, pending PG&E completion of mandatory safety inspections which will allow it to re-energize the Geysers #9 high-voltage transmission line. NCPA has been told that the line may remain down until March 2020, to address actions needed to bring the line into compliance with several NERC reliability standards. We understand that such maintenance has been deferred by PG&E on numerous occasions in recent years.

The shut-off is already having significant implications for the amount of renewable generation that will be available to the NCPA members that receive geothermal generation to serve their communities. Given the historical load factor associated with the NCPA plants, a five-month outage could reduce the level of statewide renewable generation by more than 200,000 megawatt hours, a result that is simply unacceptable.

B. NCPA Member City of Healdsburg

The City of Healdsburg is located in Sonoma County and has its own electric utility. Healdsburg's POU serves around 6,000 meters serving its population of approximately 11,840 residents, and is directly connected to PG&E's transmission lines. Healdsburg's PSCS notifications from PG&E were varied over the course of the PSCS event. When PG&E first gave notice of potential PSCS events on October 23, Healdsburg was not included. An updated notice on October 25 at 12:30 p.m. still did not list Healdsburg as in scope, and the city attempted to find out if that was indeed the case since there was other conflicting information being provided on PG&E's websites. On that same day, during a PG&E stakeholder conference call regarding the PSCS event, PG&E noted that 36 transmission customers would be de-energized, but when asked, the PG&E representatives on the call could not identify the customers or what transmission lines were at risk of being de-energized. As of October 26, at 8 a.m., Healdsburg was still trying to get confirmation of whether they would be impacted by the PSCS or what transmission lines PG&E considered in the scope of the PSCS. At approximately 10:30 a.m. that same day, CalFire ordered an evacuation of Healdsburg for 4 p.m. that afternoon due to the encroaching Kincadee Fire.

At 11 a.m., Healdsburg's utility director received a call from PG&E saying that the transmission lines into Healdsburg would be de-energized at 2 p.m. During this time, PG&E did not ask Healdsburg for any mutual assistance, and there was no communication with the POU on what the issue was, and no ability to talk with someone at PG&E about the need for de-energization or whether the event could be delayed or mitigated by curtailing load rather than de-energizing the entire transmission line. Healdsburg was very concerned with losing power throughout the city in the midst of a massive evacuation effort, and working with NCPA and Senator McGuire's office, Healdsburg was able to convince PG&E to agree to delay the shut-off until about 5 p.m.; the transmission lines were ultimately de-energized at approximately 7:50 p.m. on October 26. At no time was Healdsburg able to communicate directly with a PG&E representative with operational knowledge or input into the decision to de-energize. Healdsburg subsequently learned that the de-energization was directed by CalFire, but the city was never consulted regarding the scope of the de-energization, or whether there were alternatives that would have reduced the risks and still addressed CalFire's concerns.

C. NCPA Member City of Ukiah

The City of Ukiah, located in Mendocino County, owns and operates its own electric utility (a POU) that serves the approximately 16,000 residents of the city, as well as commercial and industrial customers. The city owns the distribution lines within its jurisdiction, but takes service from PG&E's transmission lines that feed into those distribution circuits. The city effectively has two transmission feeds coming into Ukiah, both of which are PG&E lines. PG&E October 24 announcement of a potential PSPS event included notice of the potential for wide-spread de-energization impacts in Mendocino county and the city of Ukiah. Upon receiving this "generic" notice, Ukiah's utility director contacted PG&E to get more detailed information about the potential outage; Ukiah was informed by PG&E that the transmission lines into the city that connected to the POU's own distribution system were not expected to be de-energized.³ There were subsequent discussions between Ukiah and PG&E personnel between the time the first notice was made on October 24 and the afternoon of October 25, as the city wanted to ensure they had the most up-to-date information. As of 4:30 p.m. on October 25, the POU confirmed with PG&E that there was no anticipated PSPS event for the transmission lines into Ukiah. At approximately 5 p.m. that same day, the Ukiah police department received a call from PG&E with the notification that the transmission line would be de-energized on October 26 at 2 p.m. Ukiah has two transmission line feeds into the city, the city was notified that both of these feeds would be taken offline. While the feed in the south was offline due to the Kincade Fire, the feed to the north was being part of the PSPS called due to extreme fire danger from high winds and potential fire risk to areas north of Ukiah. While Ukiah's POU is a critical facility that should receive direct priority notification, the designated utility contact was not contacted by PG&E until after on the night of October 25; that notice came from a customer's service representative. Ukiah requested a PG&E contact for information on technical and decision-making responsibility related to the decision to de-energize the transmission line into Ukiah, none was provided. At that time, Ukiah's POU was only provided information on various conference calls, and the information being provided varied and was not consistent with what was on PG&E's website. The confusion was further exacerbated by the fact that it was not possible to tell which of the information sources was the most up-to-date. The transmission line into Ukiah was de-energized at approximately 7 p.m. on October 26, and Ukiah remained without power for more than four days. During this time, not only was Ukiah unable to obtain accurate information specific to the de-energization of the transmission lines into the city, but

³ Section 7, Table 1.1 of the October 26 Report includes a summary of the "Local Community Representatives Contacted," and the timeline for the contacts.

communications were further challenged since Ukiah experienced some issues with connectivity for both cell phone and internet service during the PSPS event.

II. NCPA Observations and Suggestions Stemming from the October 26 – November 1 PSPS Event

A. Communications Protocols for Transmission-Dependent POU's Must be Improved

PG&E communications to transmission-dependent utilities like Healdsburg and Ukiah needs improvement for timeliness, accuracy, and technical considerations. It cannot be overstated that the POU's – *critical facilities and public safety partners requiring the highest priority notice* – must get better information from PG&E in the face of a proposed PSPS event. The CPUC Phase 1 Decision recognizes that POU's are both public safety partners and critical facilities, yet PG&E has yet to comply with the necessary notice provisions these entities critically need. In order to avoid catastrophic impacts on public safety within and around the POU's' service territories, PG&E must provide detailed, accurate, and timely information to the POU's regarding pending de-energizations. In prior responses to PG&E's post-event reports, NCPA identified three high priority shortcomings in this regard:

- PG&E Failed to Provide Adequate Information in a Timely Manner
- PG&E Must Better Coordinate Notification to Local POU's
- The Information PG&E Provides to Affected Entities Must be Timely, Accurate, and Relevant.

To date, none of those issues have been improved, despite the fact that PG&E has acknowledged these shortcomings. PG&E's post-event report states that "areas highlighted for further improvement include enhanced scoping ability, increasing the accuracy of data, Estimated Times of Restoration (ETOR) precision and communication, improved map precision and communication, optimizing external communication, and addressing EOC staff fatigue" (October 26 Report, p. 2). These most recent observations should not come as a surprise, and NCPA adds that as many of these concerns have already been raised directly with PG&E representatives. NCPA believes that PG&E must immediately increase the accuracy of the data provided, the precision of the PG&E outage area maps, and their communications with entities operating critical facilities. If PG&E is able to better identify the scope of potential outages and increase the accuracy of the information that is provided to customers – including being able to identify the actual transmission lines that maybe de-energized – NCPA and its members agencies would be better able to prepare for a PSPS event, and even take steps that could mitigate the overall impact of the outage in their own communities. For example, this knowledge would allow NCPA to determine if it can employ load shedding and circuit switching within its own

areas to reduce the outage impact. Just as importantly, if PG&E personnel involved in PSPS-decision making have better information (or are better informed) about their own system, PG&E can also make decisions about circuit switching or sectionalizing throughout its service territory, as well as make recommendations regarding possible load shedding that could reduce the impact of the de-energization, including the extent of the adverse impacts on public safety.

As demonstrated above in the timeline regarding the communications and interactions between PG&E and the POU, PG&E's communications remain insufficient to provide the POU with adequate information to make informed decisions about their own necessary responses. As soon as PG&E identifies an anticipated impact to a transmission line that feeds a POU, PG&E must notify the POU's contact. That notification cannot be second hand, and cannot be so generic as to not even identify the line at issue. As critical facilities, the POU's utility director must be notified at the same time PG&E is notifying the police department.

B. PG&E Must Improve the Level of Information Sharing and Exchange of Information with POU's about Potential PSPS Events

PG&E must not only provide timely notice to POU's about prospective outages, but they must provide that information with enough detail to allow the POU to ascertain the extent of the impact on its own system. The bottom line is that PG&E has – or should have – detailed information about the lines that will be subject to a PSPS event, and should share that information with affected entities. PG&E must improve the accuracy of the information that it provides to customers and the public in advance of a potential PSPS event. It is reasonable that the utility would not know with 100% certainty all the customers that *will* be impacted, but it should know what customers are served by the lines that it has identified for possible de-energization.⁴ Once those lines have been identified, PG&E must accurately and timely convey this information to its customers. To date, PG&E has provided broad-ranging, and inaccurate information about the “footprint” of a potential PSPS event, resulting in needless confusion and concern for customers. NCPA has been raising this issue directly with PG&E and in past responses to the PSPS event reports since the September 25 event, and the same problem was still persisted on the eve of the November 20 PSPS event.⁵

⁴ Indeed, in order to for PG&E to make the necessary determination that “the public benefit of the de-energization event outweighed any potential public safety risks,” PG&E must know the extent to which customers will be impacted, including transmission-level customers. (See D.19-05-042, Appendix A, p. A24)

⁵ On November 17 and 18, the City of Healdsburg received communications from PG&E about a planned PSPS; in that instance, when PG&E notified the City of Healdsburg (a public safety partner) that due to the high winds, transmission lines in their area may be impacted, PG&E did not identify the lines that would be impacted or

Not all customers are similarly situated, and not all customers will need or can even understand the same level of information regarding a PSPS event. While some customers may have no understanding of integrated circuits or the concept of load shedding, others do have this knowledge, particularly transmission level customers of PG&E that are utilities themselves. This is something PG&E should be aware of when communicating with its customers, as it goes directly to the notion of “meaningful notice.”

Furthermore, the notices from PG&E must be accompanied by a point of contact that can work with the customer throughout the PSPS event. When a POU is going to be subject to a PSPS event, PG&E must provide the POU utility director with an *operational* point of contact that has knowledge of PG&E’s infrastructure in the impacted area, and that can coordinate with the POU throughout the outage and ensuing restoration period. This is important not only for purposes of ensuring that the POU has a direct contact that can address *utility* concerns, but also so that the POU and PG&E can discuss potential options to mitigate the impacts of a PSPS event. For example, during the October 26 Event, it may have been possible for the City of Healdsburg to employ alternatives to address the need to de-energize certain lines, rather than fully de-energizing all lines serving the city. In that instance, PG&E advised Healdsburg that the transmission lines were being de-energized because they were within an area identified by CalFire as being within the Kincadee Fire footprint. However, Healdsburg was able to ascertain from looking at the maps that it may not have been necessary to de-energize all of the lines within that footprint for fire safety purposes. Had PG&E assigned a technical point of contact to work with Healdsburg that had input into the decision-making chain and knowledge of the affected PG&E lines, the magnitude of the impact on Healdsburg could have been mitigated. Given that the de-energization occurred while the city was being evacuated, this knowledge would have been vital in reducing the risk to public safety.

Similarly, when the two separate transmission lines into the City of Ukiah were slated for de-energization, it is possible that there may have been alternatives to address the issue rather than fully de-energizing all lines and shutting off all power into Ukiah. If this kind of contact had been established by PG&E, the POU could have provided essential, local knowledge to better inform the information used to assess whether the de-energization was necessary and assessing the related risks. A technical point of contact that was part of the decision-making chain working directly with the city could have helped mitigate against unnecessarily broad

otherwise provide the level of detail needed for a POU to plan for a potential city-wide electricity outage. While the City did receive notice approximately eight hours later that they were “no longer in scope” for the potential outage, those eight hours could have been spent meaningfully preparing for an outage, rather than guessing what – if any – of the transmission lines referenced in PG&E’s so-called notice were impacted.

transmission-level de-energizations. PG&E should employ this as a regular course of action for all future PSPS events in order to mitigate against unnecessarily broad transmission-level de-energizations.

PG&E should utilize the expertise of the POUs within the scope of any proposed PSPS event. Indeed, the de-energization protocols must ensure that affected POUs are part of the informed decision-making process. Since PG&E is required to demonstrate that the PSPS benefits outweigh the risks to the public, PG&E needs to weigh these risks with an understanding of the conditions in the affected areas, and with local knowledge. The experiences of NCPA and its member agencies that were impacted by the October 26 Event demonstrates that PG&E lacked the knowledge and information specific to the local areas being impacted, including the local geography and infrastructure at issue. Without that information, PG&E cannot fully assess the fire risks versus PSPS risks. While it appears that PG&E has is knowledge able about where its infrastructure lies on a map, that does not translate to a comprehensive understanding of the terrain and the actual conditions on the ground.

C. More Detailed System Information Must be Shared with Affected Entities

PG&E should have detailed information about its system, yet when the PSPS event is announced, the utility does not share information with affected entities about the exact areas of impact or related information. This has been an ongoing issue across PG&E's service territory and has affected thousands of customers – some that are told they will have their power shut-off when they are not even PG&E distribution-line customers. PG&E's press releases and “outage maps” cannot continue to provide overly broad information about impacted areas; this shotgun approach to ensuring that affected customers are notified is not acceptable. As noted above, this lack of detailed and accurate information has detrimental impacts, and the utility must improve the level of detail it provides to the public. It is simply not acceptable to assume that PG&E can determine that a PSPS – a measure of last resort – should be initiated without having assessed the public safety implications associated with de-energizing its customers. And to do so, the utility must know what exactly what transmission lines and distribution lines *could* be de-energized when it makes its decision to issue a PSPS alert, and what customers will be impacted. This is especially true given that there are fewer transmission-level customers than distribution customers, which means that the utility should be more readily able to identify and notify the distribution customers.

D. PG&E Must Improve its Processes for Ensuring Timely Re-energization and Restoration

Timely restoration – and informed communications from PG&E about restoration – are just as important as upfront information about a potential de-energization. Yet in this area, while PG&E continues to acknowledge the importance of timely restoring power to its customers, its process and communications with those customers remains lacking. Delayed maintenance and lack of resiliency on PG&E’s system has led to restoration delays that are exacerbated by fire and wind-induced damages. While not all of the continuing outages on PG&E’s system are lines that were proactively de-energized by PG&E, power has not yet been restored to all of its transmission lines. As noted above, lines serving NCPA’s geothermal facility remain out of service. This is noteworthy because while PG&E’s post-event report provides information regarding the de-energization and restoration processes,⁶ it does not convey the whole picture, including the need for PG&E to maintain its entire system in a manner that ensures all of its lines can be re-energized in a timely manner after an emergency event.

The October 26 Report says “PG&E recognizes that the timely restoration of customers is of the utmost importance and is committed to leveraging all currently available resources while continuing to explore new processes and technologies that reduce restoration times” (October 26 Report, p. 2). Despite this assertion, PG&E has been unwilling to collaborate with NCPA on options that would mitigate the impact on ongoing line outages. For example, PG&E has still not been able to restore all of the power lines serving NCPA’s generation facility. This speaks to a real problem not only with the resiliency of PG&E system, but to PG&E’s decision regarding utility personnel assigned to work with customers on restoration, and PG&E’s willingness to work with affected entities to provide alternatives that could mitigate outage impacts.

After the Kincade Fire and related outages, NCPA reached out to PG&E in an attempt to discuss alternatives that would allow transmission to the generation facility to be restored. One such alternative was for PG&E to run transmission on half the system at full power, which would have allowed NCPA to fully operate Geothermal Plant #1 since the generation capacity at the plant has been reduced to approximately 100 MW in recent years and the delivery capacity of the generation ties remain at 200 MW. PG&E declined to entertain the alternative. As a result, the transmission line is still not active and NCPA is not able to run the plant. For each day that the line is not operational, approximately 50 MW of clean, RPS-eligible, renewable energy is not delivered to the grid.

⁶ See October 26 Report, p. 8; Appendix A.

Another shortcoming in the area of restoration was identified in the City of Ukiah. Following the October 26 Event, Ukiah faced numerous challenges receiving information from PG&E about restoration of power to the transmission lines serving the city. Following the end of the wind events, Ukiah sent its utility crews out to inspect its distribution lines to ensure that the lines had not been damaged during the outage and were ready to be brought back online once PG&E has restored power to the transmission lines. Despite hearing from PG&E that the PSPS-event had passed early on October 29, the City did not receive any specific information from PG&E regarding when the transmission line would be re-energized. It was not until 24 after that that Ukiah was notified that PG&E may be able to restore power on the evening of October 30, but the PG&E representative was not able to provide any specific details regarding the restoration. Fortunately for Ukiah, someone from PG&E with technical operations knowledge about the PG&E facilities in the area contacted the utility director to discuss operational needs, and based on this informed discussion, Ukiah's transmission feeds were brought back online shortly thereafter. By this time, the City had been without power for four days.

The need to have an informed PG&E contact working with POUs on re-energization is highlighted by what occurred in Healdsburg. Following the complete de-energization of the transmission lines providing service to the city, the evacuation orders were lifted, and the city was prepared to have the lines re-energized. On the afternoon of October 29, after three days without power, the utility director was finally contacted by a PG&E representative with knowledge of the system. Working directly with the utility to ascertain what load would be put back on the lines, PG&E was able to re-energize the lines into Healdsburg on October 29 at 6:30 p.m. Part of the reason the re-energization was able to occur sooner than what PG&E had originally estimated was because Healdsburg utility personnel were finally able to speak directly with PG&E technical and operational personnel; they were able to inform PG&E that the lines could be inspected via a drivable route and PG&E would not have to wait for an available helicopter to perform the inspection as they had anticipated. Healdsburg was also able to confirm with PG&E the load that would be placed on the lines, which allowed PG&E to re-energize accordingly.

What NCPA wants to underscore here is that it is vitally important that PG&E not only timely communicate with its transmission-level customers about re-energization and power restoration, but that the utility ensure that the contacts assigned to work with these customers are knowledgeable about PG&E's system and infrastructure in the impacted areas, as well as the needs of their transmission level customers. Assigning a "customer service representative" to keep these POUs informed of general updates is not sufficient to address the specific needs of POU customers. PG&E's PSPS event planning processes must include a strategy for ensuring that transmission-level customers are assigned contacts that are familiar with the area,

knowledgeable about the infrastructure at issue, and kept informed about developments in real time.

E. It is Imperative that PG&E Prioritize Increasing the Resiliency of its System to Reduce the Scope and Impact of Future PSPS Events

Part of the Commission's review of PG&E's activities relevant to PSPS events must be done with an eye towards reducing the total number of PSPS events in the future. Another important aspect is mitigating the scope of PSPS events when they are needed. In order to do this, PG&E must improve the resiliency of its transmission and distribution system. To that end, NCPA reiterates its call for PG&E to undertake a comprehensive review of its system to ascertain how best to employ mitigation tools such as sectionalizing, circuit switching, and where possible, load shedding. PG&E reports that during the last event, it was able to sectionalize 272 of the in-scope circuits, which resulted in reducing the total number of customers impacted by this PSPS event by approximately 533,084 customers. (PSPS Event Report, p. 19) Based on its own experiences with PG&E during the last few PSPS events, and in particular the October 26 event, NCPA believes that this number can be vastly improved. At a minimum, the ability to switch circuits and potentially shed load in certain impacted areas may be sufficient in some instances to avoid de-energization events altogether. While that is not certain, what is certain is these efforts would vastly increase the resiliency of the system, which would reduce the impacts of any outage event, irrespective of the cause.

F. PG&E and POUs Must Coordinate to Better Prepare for Providing Mutual Aid

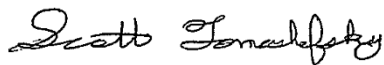
During any outage, a utility's ability to call on mutual aid is a vital asset to facilitate power restoration. As we noted in our earlier response to the PSPS event, while mutual aid is critically important, it is also something that must be planned and coordinated in advance of an emergency event. PG&E should work with the POUs located in their service territory to coordinate the provision of mutual assistance during planned and unplanned outages, and to optimize the use of POU or electric cooperative resources in areas where they have local knowledge.

Ukiah offered mutual aid to PG&E to assist with inspections and restoration after the outage, and was notified that they were in PG&E's queue to be dispatched to Eureka to provide support – an area more than 150 miles from Ukiah. While there were de-energized lines and outages in and around Ukiah, trained utility personnel with knowledge of the terrain, the poles, wires, and nuances of different circuits, and any priorities for re-energization that exist within the community were going to be dispatched outside the community to offer aid. At the same time, it

is likely that other utility personnel would have been dispatched to the area where Ukiah's staff has the most expertise. This is certainly not the best way to optimize mutual assistance. When considering how an IOU dispatches mutual aid resources, if there are POU's or cooperatives affected by a transmission-level outage, those utilities' crews should be able to support local mutual aid response in their respective areas. This will allow for faster resolution at a lower cost.

Furthermore, the utilities need to work in advance of the next fire season on better coordinating plans for providing mutual assistance. It is not enough for the utilities to be signatories to the mutual aid agreements; they must plan for providing such aid. While mutual aid makes available trained utility personnel, it does not guarantee that the personnel called upon will have advance knowledge of PG&E (or other utility) procedures. The POU's need PG&E's pre-outage coordination to ensure that our employees are trained on PG&E inspection procedures and standards, so that they can safely and efficiently implement them when called-upon. This kind of pre-outage mutual assistance planning should be part of the PG&E's PSPS protocols and Wildfire Mitigation Plan.

Respectfully submitted,



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cc: Elizaveta Malashenko, Deputy Executive Director, Safety and Enforcement Policy
R.18-12-005 Service List