

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

EXECUTIVE DIVISION

Resolution M-4863
October 6, 2022

RESOLUTION

RESOLUTION M-4863 ADOPTING ADMINISTRATIVE ENFORCEMENT ORDER OF THE SAFETY AND ENFORCEMENT DIVISION ISSUED TO SAN DIEGO GAS & ELECTRIC COMPANY REGARDING 2020 PUBLIC SAFETY POWER SHUTOFF REQUIREMENT VIOLATIONS PURSUANT TO RESOLUTION M-4846.

SUMMARY

In this Resolution, the California Public Utilities Commission (Commission) adopts the proposed Administrative Enforcement Order (AEO) issued by the Safety and Enforcement Division (SED) to San Diego Gas & Electric Company (SDG&E) to resolve SED's investigation into noncompliance with Resolution ESRB-8, Decision (D.) 19-05-042 and D.20-05-051 arising from SDG&E's 2020 Public Safety Power Shutoffs (PSPS) events. SDG&E is to pay \$24,000 to resolve its noncompliance violations from its 2020 PSPS events and take certain corrective action within 120 days following adoption of this Resolution to ensure future compliance with the PSPS requirements.

BACKGROUND

Resolution ESRB-8, Decision (D.) 19-05-042 and D.20-05-05, directed investor-owned utilities (IOUs) to follow certain requirements in executing a PSPS event. Included in these guidelines is a requirement that IOUs submit to the Commission a post-PSPS event report summarizing the event.

In 2020, SDG&E submitted five post-PSPS event reports to the Commission. These reports summarized SDG&E's seven PSPS events. Based on the information submitted in these reports, SED released a Post Event Report Review that summarized the findings of those seven 2020 PSPS events. SED's Post Event Report Review found SDG&E did not comply with certain reporting requirements under Resolution ESRB-8, D.19-05-042 and D.20-05-051.

Resolution M-4846, issued November 2020, adopted the Commission Enforcement and Penalty Assessment Policy (Enforcement Policy or Policy) and authorized Commission staff to propose an AEO to resolve an enforcement matter, subject to review and approval by the Commission.

SED issued the attached proposed AEO, pursuant to and consistent with the Enforcement Policy, in response to the violations arising from SDG&E's reporting of 2020 PSPS events. These violations are summarized in the attached proposed AEO and SED Post Event Report Review.¹

Pursuant to Resolution M-4846, a utility may request a hearing of the proposed AEO within 30 days of the date the proposed AEO is issued. (Enforcement Policy, p. 13.) The proposed AEO was issued on June 15, 2022. SDG&E did not file a request for a hearing. Accordingly, pursuant to the Enforcement Policy, the proposed AEO shall become final upon review and adoption by the Commission. (Enforcement Policy, p. 13.) The AEO resolves all issues related to SED's investigation into the noncompliance of SDG&E's 2020 PSPS events.

PENALTIES AND CORRECTIVE ACTIONS

The AEO recommended SDG&E to pay a \$24,000 fine and requires SDG&E to perform eight enumerated corrective actions and comply with associated provisions, including but not limited to submitting to SED written certification that SDG&E has corrected all violations within 120 days following adoption of the AEO by the Commission.

The Commission has broad authority to impose penalties on any public utility that "fails or neglects to comply with any part or provision of any order, decision, decree, rule, direction, demand, or requirement of the commission." (Pub. Util. Code § 2107.) The AEO outlines several instances where SDG&E did not meet the requirements of Resolution ESRB-8, D.19-05-042, and D.20-05-051. In part, these orders give guidance to IOUs of the type and timing of notifications to customers and public safety partners.

Resolution M-4846 requires that any monetary penalty assessed on a regulated entity using the Enforcement Policy must be calculated using the Penalty Assessment Methodology (Methodology). The Methodology sets forth five factors to be considered when determining the amount of a penalty. In adopting the penalties assessed by the AEO, we find that the proposed AEO appropriately considers the factors set forth in the Methodology.

The AEO recommended a \$24,000 fine as justified by SED's consideration of the Methodology including the deferential nature of the PSPS requirements, SDG&E's failure to notify some customers during de-energization and re-energization, the evolving nature of the PSPS program, SDG&E's financial resources in being able to pay a fine, and the public interest in timely notifying customers and public safety partners before, during and after a PSPS event. We consider the Methodology factors discussed in the AEO and we determine the proposed fine to be reasonable.

¹ Distinct from the process detailed in D.22-04-057 and D.22-04-058, this Resolution is the product of Commission advisory staff. Unlike Resolutions SED-5 and SED-6, this resolution puts forth an un-appealed Administrative Enforcement Order not an Administrative Consent Order. No Administrative Law Judges or Commissioners are involved in the draft of the Resolution.

The proposed AEO states that this is the first implementation of the PSPS program since the Commission issued Decisions D.19-05-042 and D.20-05-051. While this and other concurrently-issued AEOs may constitute the first use of an AEO to enforce PSPS requirements, we note that we previously investigated violations stemming from the PSPS events in 2019 conducted by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and SDG&E and directed the utilities to take certain corrective actions. (See D.21-06-014, Decision Addressing the Late 2019 Public Safety Power Shutoffs by Pacific Gas and Electric Company, Southern California Edison, and San Diego Gas & Electric Company to Mitigate the Risk of Wildfire Caused by Utility Infrastructure (Investigation (I.) 19-11-013).) We also separately investigated violations stemming from PG&E's PSPS events of late 2019 and issued D.21-09-026, which imposed various penalties for PG&E's violations of implementation and reporting requirements. We find these precedents do not weigh in favor of a higher penalty under the circumstances. We find that SED's evaluation of the Methodology factors and the proposed penalty constitutes a reasonable resolution of the violations stemming from SDG&E's 2020 PSPS events.

The AEO also requires SDG&E to perform eight enumerated corrective actions and to comply with associated provisions including but not limited to submitting to SED written certification that SDG&E has corrected all violations within 120 days following adoption of the AEO by the Commission. These corrective actions and associated compliance provisions are reasonable, appropriate, and shall become final upon adoption of this resolution by the Commission.

SDG&E did not request a hearing and tendered \$24,000 to the Commission. SDG&E accordingly shall implement the corrective actions contained in the AEO. We adopt the proposed AEO as final. The tendered amount will be deposited by the Commission upon issuance of this Resolution. The penalty amount shall not be placed in rates or be otherwise paid for by ratepayers.

COMMENTS ON DRAFT RESOLUTION

The Draft Resolution was served on SDG&E and other interested parties on September 2, 2022 in accordance with PU Code § 311(g). Comments were timely received from SDG&E on September 22, 2022. SDG&E confirmed it has opted to pay the penalty but recommends that SED develop a more transparent penalty process in future AEOs. We are committed to a transparent application of the Enforcement Policy and will take these comments under consideration in our ongoing efforts to apply it.

FINDINGS AND CONCLUSIONS

1. Resolution M-4846 authorized Commission staff to issue an Administrative Enforcement Order to resolve an enforcement matter, subject to review and approval by the Commission.
2. SED issued to SDG&E the attached proposed AEO and Post Event Report Review on June 15, 2022.
3. SDG&E did not request a hearing within 30 days of the proposed AEO's issuance and has waived its right to a hearing on the AEO's findings.

4. SDG&E has tendered the \$24,000 penalty.
5. The monetary penalty of \$24,000 and the corrective action requirements set forth in the attached AEO appropriately resolve all issues related to SED’s investigation into SDG&E’s 2020 PSPS events and any enforcement action by the Commission arising therefrom.

THEREFORE, IT IS ORDERED that:

1. The proposed Administrative Enforcement Order issued by the Commission’s Safety Enforcement Division to San Diego Gas & Electric Company relating to its 2020 Public Safety Power Shutoff event violations addressed therein is adopted as final.
2. San Diego Gas & Electric Company’s \$24,000 penalty payment shall be deposited into the State of California General Fund.
3. San Diego Gas & Electric Company shall comply with all requirements specified in the Administrative Enforcement Order issued by the Commission’s Safety Enforcement Division to SDG&E relating to its 2020 Public Safety Power Shutoff event violations, including the corrective actions set forth in the proposed AEO pursuant to the terms therein.
4. Within 120 days following adoption of this Administrative Enforcement Order, San Diego Gas & Electric Company shall submit to the Safety Enforcement Division written certification that it has corrected all violations.

This Resolution is effective today.

I certify that the foregoing Resolution was adopted by the California Public Utilities Commission at its regular meeting on October 6, 2022, and the following Commissioners approved favorably thereon:

/s/ RACHEL PETERSON
Rachel Peterson
Executive Director

ALICE REYNOLDS
President
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
DARCIE L. HOUCK
JOHN REYNOLDS

Commissioners

CALIFORNIA PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the matter of:

San Diego Gas & Electric Company’s
Execution of 2020 Public Safety Power
Shutoff Events

**[PROPOSED] ADMINISTRATIVE
ENFORCEMENT ORDER**

[PROPOSED] ADMINISTRATIVE ENFORCEMENT ORDER

YOU ARE GIVEN NOTICE THAT:

1. San Diego Gas & Electric Company is alleged to have violated Commission Resolution ESRB-8, Decision (D.) 19-05-042, D.20-05-051.
2. The California Public Utilities Commission’s Safety and Enforcement Division (SED or Division) issues this proposed Administrative Enforcement Order (Proposed Order) to San Diego Gas & Electric Company (SDG&E or Respondent) pursuant to the Commission Enforcement Policy adopted by Resolution M-4846 (Policy). Pursuant to the Policy, SED is authorized to issue a proposed Administrative Enforcement Order (Proposed Order) to a regulated entity that has violated a Commission order, resolution, decision, general order, or rule. That Proposed Order may include a directive to pay a penalty.

RIGHT TO HEARING

3. Respondent is required to respond to this Proposed Order by 5:00 p.m. on **Friday, July 15, 2022**. By way of such response, Respondent, must either: 1) pay any penalty required by this Proposed Order or 2) request a hearing on the Proposed Order. To request a hearing, the Respondent must file a Request for Hearing (including a complete title page complying with Rule 1.6 of the Commission’s Rules of Practice and Procedure) along with copies of any materials the Respondent wants to provide in support of its request with the Commission’s Docket Office **and** must serve the Request for Hearing, at a minimum, on:
 - 1) The Chief Administrative Law Judge (with an electronic copy to Administrative_Enforcement_Appeals_Coordinator@cpuc.ca.gov).
 - 2) The Director of Safety and Enforcement Division
 - 3) The Executive Director
 - 4) General Counsel
 - 5) The Director of the Public Advocates Office at the California Public Utilities Commission

The right to a hearing is forfeited if a Request for Hearing is not timely filed. If a timely Request for Hearing is not filed, this Proposed Order will become final and effective upon adoption by the Commission (Final Order).

4. Respondent must comply with the corrective action requirements of this Proposed Order by the date specified in the Proposed Order in paragraph 12 below, regardless of whether a Request for Hearing is filed. Neither payment of the penalty assessed in this Proposed Order nor the filing of a timely Request for Hearing shall excuse Respondent from curing the violations identified in this Proposed Order.
5. A requested hearing shall be conducted by an Administrative Law Judge in accordance with the hearing provisions in the Citation Appellate Rules. After hearing, this Proposed Order or any Administrative Law Judge modifications to the Proposed Order shall become a Final Order, effective upon Commission approval of the draft resolution prepared by the Administrative Law Judge. The draft Administrative Law Judge resolution approved by the Commission is subject to rehearing pursuant to Public Utilities Code section 1731 and to judicial review pursuant to Public Utilities Code section 1756.
6. This Proposed Order includes a requirement that Respondent pay a penalty. The factors set forth in the Penalty Assessment Methodology (Policy, Appendix I) were used to determine the penalty amount. The requirement that the penalty be paid shall be stayed during the hearing and rehearing process.
7. Unless otherwise specified, "days" means calendar days.

FINDINGS

8. ***Facts:*** Investor-owned utilities (IOUs) have the authority to shut off the electric power to protect public safety under California law. Utilities do this during severe wildfire threat conditions as a preventative measure of last resort through Public Safety Power Shutoff (PSPS). Such power cuts reduce the risk of the IOUs' infrastructure to cause or contribute to a wildfire. However, a PSPS can leave communities and essential facilities without power, which brings its own risks and hardships, particularly for vulnerable communities and individuals. From 2018 through 2020, the Commission issued three sets of guidelines, namely, Resolution ESRB-8, D.19-05-042 and D.20-05-051, directing the IOUs to follow these guidelines in PSPS execution. In 2020, SDG&E initiated a total of seven PSPS events and submitted five post event reports to CPUC. Stakeholders provided comments on these post event reports. SED performed reviews on the submitted reports, including consideration of stakeholder comments, to evaluate SDG&E's compliance with the reporting requirements under Resolution ESRB-8, D.19-05-042 and D.20-05-051.

Table 1

Report #	Report Title	Events Covered
1	September 8 – September 9, 2020	Sep. 8 – Sep. 9
2	September 28 – September 29, 2020	Sep. 28 -Sep. 29
3	October 26 – October 27, 2020	Oct. 26 – Oct. 27
4	November 26 – December 9, 2020	1. Nov. 26 – Nov. 28 2. Dec. 2 – Dec. 5 3. Dec. 6 – Dec. 9
5	December 23 – December 24, 2020	Dec. 23 – Dec. 24

SDG&E did not fully comply with certain provisions of Commission Resolution ESRB-8, D.19-05-042 and D.20-05-051. Please see attachment “2020 Public Safety Power Shutoff (PSPS) Post Event Report Review - San Diego Gas & Electric Company” for more details.

A. Resolution ESRB-8 states in part “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”. (ESRB-8 at 5).

A.1. In the November 26 through December 9 report, SDG&E covered three PSPS events. SDG&E combined the three events into one reporting without prior approval from SED. SDG&E did not meet the reporting deadline for two of the three events. See details below:

Table 2

Weather Events	Event concluded	Report due dates	SDG&E’s filing dates	Dates overdue
November 26 – 28	Nov. 28	Dec. 11	Dec. 23	12
December 2 – 5	Dec. 5	Dec. 18	Dec. 23	5
December 6 – 9	Dec. 9	Dec. 23	Dec. 23	N/A

B. D.19-05-042 Appendix A states in part “[i]n addition to submitting a report to the Director of the Commission’s Safety and Enforcement Division within 10 business days of power restoration, electric investor-owned utilities must serve their de-energization report on the service lists of this proceeding and Rulemaking 18-10-007 or their successor proceedings. Service should include a link to the report on the utility’s website and contact information to submit comments to the Director of the Safety and Enforcement Division.” (Appendix A at A22).

B.1. SDG&E’s November 26 – December 9 post event report, served on December 23, 2020, covered multiple events. SDG&E missed the deadline for the following two events.

Table 3

Weather Events	Event concluded	Service due dates	SDG&E's serving dates	Dates overdue
November 26 – 28	Nov. 28	Dec. 11	Dec. 23	12
December 2 – 5	Dec. 5	Dec. 18	Dec. 23	5

C. D.19-05-042 Appendix A states in part “the electric investor-owned utilities must provide the decision criteria leading to de-energization, including an evaluation of alternatives to de-energization that were considered and mitigation measures used to decrease the risk of utility-caused wildfire in the de-energized area” (D.19-05-042 at A22-A23). “Each electric investor-owned utility must clearly articulate thresholds for strong wind events as well as the conditions that define “an extreme fire hazard” (humidity, fuel dryness, temperature) that the electric investor-owned utility evaluates in considering whether to de-energize.” (D.19-05-042 at 91).

C.1 SDG&E reported it considered various factors in calling a PSPS event. However, it has not developed a specific PSPS algorithm that lists, quantifies and calculates the weight of each factor that is incorporated into a PSPS. SDG&E did not clearly articulate the decision criteria and threshold for each event.

C.2 SDG&E reported once extreme fire risk weather conditions have materialized, alternatives to PSPS are limited. However, SDG&E did not provide the specific alternatives it considered for each event nor the evaluation of the alternatives.

D. D.19-05-042 states in part “[t] the electric investor-owned utilities must provide notice when a decision to de-energize is made, at the beginning of a de-energization event, when re-energization begins and when re-energization is complete. The electric investor-owned utilities should, whenever possible, adhere to the following minimum notification timeline:”

- 48-72 hours in advance of anticipated de-energization: notification of public safety partners/priority notification entities
- 24-48 hours in advance of anticipated de-energization: notification of all other affected customers/populations
- 1-4 hours in advance of anticipated de-energization, if possible: notification of all affected customers/populations
- When de-energization is initiated: notification of all affected customers/populations
- Immediately before re-energization begins: notification of all affected customers/populations

- When re-energization is complete: notification of all affected customers/populations (D.19-05-042 at A8).

D.1. For four of the five reports submitted, SDG&E did not comply with the required minimum notification timeline. These included:

D.1.1 No de-energization initiation notifications to customers.

D.1.2 No 1-4 hour imminent notifications

Table 3 lists the notification timeline noncompliance for each event (page number references are to SDG&E’s PSPS post event report for the dates listed)

Table 3

Event dates	Non-compliance
Sep. 8 – Sep. 9	No notifications to customers when the de-energization was initiated.
Nov. 26 – Dec. 9	No 1-4 hour imminent notifications (Appendix 1, Page 2-3)
Dec. 23 – Dec. 24	No 1-4 hour imminent notifications (Appendix 1, Page 2)

D.2 SDG&E did not send out any advance notifications to some customers prior to the beginning of de-energizations in three instances. The number of customer not provided any advance notifications are below:

- October 26 – 27: 1,466 customers
 - November 26 – December 9: 5,510 customers
 - December 23 – 24: 1,765 customers
- Total: 8,741 customers

D.3 For the September 8 – 9 event, SDG&E did not send the restoration completion notifications to public safety partners. (page 34)

E. D.19-05-042 states in part “[t]he electric investor-owned utilities must partner with local public safety partners to communicate with all other customers that a de-energization event is possible, the estimated start date and time of the de-energization event, the estimated length of the de-energization event, which may be communicated as a range, and the estimated time to power restoration, which again, may be communicated as a range.” (D.19-05-042 at A17).

E.1 SDG&E’s customer notifications did not contain the estimated length of the de-energization event, and the estimated time of restoration.

F. D.19-05-042 states in part “the electric investor-owned utilities must provide the following information: 4) A description and evaluation of engagement with local

and state public safety partners in providing advanced education and outreach and notification during the de-energization event” (D.19-05-042 at A22-A23).

F.1 SDG&E did not report it evaluated the engagement with local and state public safety partners by conducting a survey after the September 28-29 PSPS event although there was no actual power shut off during the event.

G. D.19-05-042 states in part “the electric investor-owned utilities must provide the following information: 5) For those customers where positive or affirmative notification was attempted, an accounting of the customers (which tariff and/or access and functional needs population designation), the number of notification attempts made, the timing of attempts, who made the notification attempt (utility or public safety partner) and the number of customers for whom positive notification was achieved;” (D.19-05-042 at A22-A23).

G.1. SDG&E reported that it successfully made affirmative notifications to medical baseline (MBL) customers who were not reached by phone. However, SDG&E did not report the number of notification attempts made to MBL customers and the timing of attempts.

H. D.20-05-051, Appendix A (c) states in part “[e]ach electric investor-owned utility shall enumerate and explain the cause of any false communications in its post event reports by citing the sources of changing data” (D.20-05-051 at Appendix A, page 4).

H.1. SDG&E did not enumerate nor explain the cause for instances when customers were notified of de-energization but did not have their power shut off.

I. D.20-05-051, Appendix A (h) states in part “[t]hese reports shall include a thorough and detailed description of the quantitative and qualitative factors it considered in calling, sustaining, or curtailing each de-energization event (including information regarding why the de-energization event was a last resort option) and a specification of the factors that led to the conclusion of the de-energization event. (D.20-05-051 at Appendix A, page 9).

I.1. SDG&E did not provide thorough and detailed quantitative factors it used to decide to call a PSPS event and why the de-energization was the last resort.

PENALTIES

9. The Commission has broad authority to impose penalties on any public utility that “fails or neglects to comply with any part or provision of any order, decision, decree, rule, direction, demand, or requirement of the commission.” (PU Code § 2106). We outlined several instances in this Order where SDG&E did not meet the

provisions of Resolution ESRB-8, D.19-05-042, and D.20-05-051 as directed by the Commission. In part, these orders give guidance to IOUs of the type and timing of notifications to customers and public safety partners. In assessing penalties, we follow the Penalty Assessment Methodology as set forth by the Commission and outlined in Resolution M-4846. This methodology evaluates the reasonableness of a penalty using a five-factor analysis.

As discussed below, given the deferential nature of the PSPS requirements, SDG&E's failure to notify some customers during de-energization and re-energization, the evolving nature of the PSPS program, SDG&E's financial resources in being able to pay a fine, and the public interest in timely notifying customers and public safety partners before, during and after a PSPS event, SED recommends a fine of \$24,000.

I. Severity or Gravity of the Offense

The severity of the offense considers the physical and economic harms of the offenses, harm to the regulatory process, and the number of people affected by the offense. As we explain below, the violation SDG&E is fined for is a failure to provide notifications during the de-energization event. There is no evidence that there was any physical or economic harm because of the lack of notification. The number of customers affected by the violation was not especially numerous. For example, during the PSPS event on September 8-9, no notification was sent out during de-energization or re-energization but only 49 customers were affected. Furthermore, the lack of clarity in the reporting of which notifications were sent out and which customers received them posed a harm to the regulatory process. For example, SDG&E references an "overnight" notification but makes no reference to Commission's decision that requires this type of notification.

II. Conduct of the Regulated Entity

The second factor we consider is the conduct of SDG&E. We are mindful that the Commission gave IOUs great discretion in several areas given the dynamic nature of these events and the infancy of the PSPS program. This is especially true of advance notifications prior to a de-energization event. While the Commission highlights the importance of advance notification prior to a PSPS, it also recognized situations where advance notice is impossible due to changing circumstances. Resolution ESRB-8 requires the IOU to notify customers "to the extent feasible and appropriate" (p. 4), recognizing that "it is not practicable to have an absolute requirement that electric IOUs provide advance notification to customer prior to a de-energization event." (p. 5). D.19-05-042 expanded somewhat on advance notifications to customers but again acknowledged "there may be times when de-energization must occur with little to no notification in order to respond to an emergency situation, to avoid the risk of a utility-caused wildfire, or because de-energization occurs

due to an unforeseen circumstance outside of the control of the utility.” (pp. 85-86).

D.19-05-042 requires IOUs to provide advance notifications 48-72 hours in advance of an anticipated de-energization, 24-48 hours in advance, and 1-4 hours in advance “whenever possible”. (p. 86-87). It further recognizes that advanced notification 1-4 hours before an anticipate de-energization event “may not be possible at this juncture.” (p. 87, fn. 93).

With that, the Commission does not extend deference to utilities in three instances of required notification to affected customers; when de-energization was initiated, when re-energization begins, and once re-energization is completed. These events are unambiguous in that they are triggered by an event completely in the control of the utility— the physical de-energization. These notifications are required by order of the Commission.

This Order and the accompanying report lay out instances where SDG&E did not provide advance notifications to certain customers as required by the Commission. SDG&E is required to explain why no advanced notification was made to these customers and should use this information to better inform decisions for future PSPS events.

During the PSPS events in 2020, there were instances SDG&E did not send out notifications to affected customers when de-energization was initiated, immediately before re-energization began or when re-energization was complete. As noted above, the September 8-9 event saw several customers receiving no notifications at the initiation of and conclusion of the event. SDG&E’s failure to provide those notifications to customers was a violation of D.19-05-042. But we would point out that while a customer may not have received a notification during de-energization or re-energization, they may have still received an advance notification prior to shut-off. It does not appear that any customer would have gone through an entire PSPS event with no notifications, in advance of the event or during.

III. Financial Resources of the Regulated Entity, Including the Size of the Business

The third factor under the methodology is the financial resources of the utility. Here, the Commission must ensure against excessive fines or penalties while imposing an effective fine/penalty. An effective fine or penalty is one that reflects the severity of the harm (the first factor examined above) and is also proportionate to the offending entity and those similarly situated to deter future similar offense of violations, without putting them out of business or otherwise impacting the entity in a catastrophic way.

Here, we recommend SDG&E be assessed a fine of \$24,000. SDG&E is one of the largest electric utilities in the state of California in terms of customers and revenue. This amount is enough to emphasize the importance of the notification requirements relative to its size.

IV. Totality of the Circumstances in Furtherance of the Public Interest

The fourth factor under Resolution M-4846 is an evaluation of the penalty in the totality of the circumstances, with an emphasis on protecting the public interest. As described above, a \$24,000 fine is reasonable under the circumstances. D.19-05-042 went into detail about the importance of notification requirements during a PSPS event (p.35-37, 85-87). The Commission emphasized the balance that must be struck in communicating the risk of a PSPS without causing confusion or ambivalence. This fine represents the importance the Commission placed on the notification framework in D.19-05-042. While all customers may have received a notification of a de-energization at some point, the Commission emphasized a more structured approach to optimize public awareness.

V. The Role of Precedent

The final factor is an examination of fines in other Commission Decisions with similar factual situations. This is the first implementation of the PSPS program since the Commission Decisions D.19-05-042 and D.20-05-051. We believe a \$24,000 fine in this instance can serve as an adequate benchmark for any potential violations during future PSPS events.

Based on the above, we believe a fine of \$24,000 is reasonable and appropriate under Resolution M-4846.

10. This penalty is due within 30 days of adoption of the Final Order. Respondent's payment shall be by check or money order and shall be made payable to the California Public Utilities Commission. Respondent shall write on the face of the check or money order: "For deposit to the State of California General Fund." Respondent shall deliver payment to:

California Public Utilities Commission's Fiscal Office
505 Van Ness Avenue
Room 3000
San Francisco, CA 94102

11. In the event the payment specified in paragraph "Penalties" is not timely received by the Commission, a late payment will be subject to interest in the amount of 10% per year, compounded daily and to be assessed beginning the calendar day following the payment-due date. The Commission may take all necessary action to

recover any unpaid penalty and ensure compliance with applicable statutes and Commission orders.

The penalty amount shall not be placed in rates or be otherwise paid for by ratepayers.

CORRECTIVE ACTION

12. Respondent shall conduct the following actions in the manner specified herein, and in accordance with a schedule specified by the Division as follows:
 - 1) SDG&E must file, submit and serve the post event report in compliance with guideline requirements for each individual PSPS event
 - 2) SDG&E must report the decision criteria, clearly articulate the thresholds it evaluated in considering whether to de-energize.
 - 3) SDG&E must provide specific alternatives it considered for each event as well as the evaluation of the alternatives.
 - 4) SDG&E must send the notifications to public safety partners and customers in compliance with the requirement under D.19-05-042 including timeline and notification content.
 - 5) SDG&E must provide the evaluation of engagement with state and local public safety partners.
 - 6) For customers where positive or affirmative notification was attempted, SDG&R must report the number of notification attempts made and the timing of attempts.
 - 7) SDG&E must enumerate and explain the cause of situations at-issue, which involves some level of perceived defect in notice, including but not limited to, when customers were de-energized without any advance notifications and when customers are notified for de-energization, but end up with no power shut off.
 - 8) SDG&E must provide thorough and detailed quantitative factors it considers in calling a PSPS event and why the de-energization was the last resort.
13. Within 120 days following adoption of this Order by the Commission (Final Order), Respondent shall submit to the Division written certification that it has corrected all violations. The certification shall include confirmation of its compliance (accompanied by all supporting documentation) or noncompliance with all requirements set forth in Paragraph 12. Any notice of noncompliance required under this paragraph shall state the reasons for noncompliance and when compliance is expected and shall include a detailed plan for bringing the Respondent into compliance. Notice of noncompliance shall in no way excuse the noncompliance.
14. Respondent shall be subject to an additional penalty amount for each failure to comply with the actions required by Paragraph 12. The penalty amount shall be within the range allowed by statute and calculated in accordance with the

Commission's Penalty Assessment Methodology, attached as Appendix I to the Policy.

15. All written submittals from Respondent pursuant to this Order shall be sent to:
Division Director Lee Palmer
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

All other communications from Respondent shall be to:

Anthony Noll
Program Manager
Anthony.noll@cpuc.ca.gov,
(916) 247-9372.

16. All approvals and decisions of the Division will be communicated to Respondent in writing by the Division Director or a designee. No informal advice, guidance, suggestions, or comments by the Division regarding reports, plans, specifications, schedules or any other writings by Respondent shall be construed to relieve Respondent of the obligation to obtain such formal approvals as may be required or to bind the Commission.
17. If the Division determines that any report, plan, schedule, or other document submitted for approval pursuant to the Proposed or Final Order (Order) fails to comply with the Order, the Division may:
 - (a) Return the document to Respondent with recommended changes and a date by which Respondent must submit to the Division a revised document incorporating the recommended changes.
18. If Respondent is unable to perform any activity or submit any document within the time required under this Order, Respondent may, prior to expiration of time, request an extension of time in writing. The extension request shall include a justification for the delay and a detailed plan for meeting any new proposed compliance schedule. All such requests shall be in advance of the date on which the activity or document is due.
19. If the Division determines that good cause exists for an extension, it will grant the request and specify in writing a new compliance schedule. Respondent shall comply with the new schedule.
20. All plans, schedules, and reports that require the Division approval and are submitted by Respondent pursuant to this Order are incorporated into this Order upon approval by the Division.

21. Neither the State of California, nor its employees, agents, agencies (including the Commission), representatives, or contractors, shall be liable for injuries or damages to persons or property resulting from acts or omissions by Respondent or related parties in carrying out activities pursuant to this Order, nor shall the Commission be held as a party to a contract entered into by Respondent or its agents in carrying out activities pursuant to this Order.
22. A Final Order shall apply to and be binding upon Respondent, and its officers, directors, agents, employees, contractors, consultants, receivers, trustees, successors, and assignees, including but not limited to individuals, partners, and subsidiary and parent corporations. Respondent shall provide a copy of this Final Order to all contractors, subcontractors, laboratories, and consultants that are retained to conduct any work or activities performed under this Final Order, within [15] days after the effective date of this Final Order or the date of retaining their services, whichever is later. Respondent shall condition any such contracts upon satisfactory compliance with this Final Order. Notwithstanding the terms of any contract, Respondent is responsible for compliance with this Order and for ensuring that its subsidiaries, employees, contractors, consultants, subcontractors, agents, and attorneys comply with this Order.
23. Nothing in this Order shall relieve Respondent from complying with all other applicable laws and regulations. Respondent shall conform all actions required by this Order with all applicable federal, state, and local laws and regulations.
24. This is an action to enforce the laws and regulations administered by the Commission. The method of compliance with this enforcement action consists of payment of an administrative penalty and compliance actions to enforce a permit or order issued by the Commission. The Commission finds that issuance of this Order is exempt from the provisions of the California Environmental Quality Act (Public Resources Code § 2100 et seq.) pursuant to section 15321(a)(2); chapter 3, title 14 of the California Code of Regulations exempting actions to enforce or a permit prescribed by a regulatory agency.
25. The Respondent shall not have any ex parte communications with Commission decisionmakers and will only communicate with the Commission through Request for Hearings or other appropriate procedural avenues.

IT IS ORDERED.

DATE: _____ BY: _____

Leslie Palmer
Director, Safety and Enforcement Division
California Public Utilities Commission

2020 Public Safety Power Shutoff (PSPS) Post Event Report Review San Diego Gas & Electric Company (SDG&E)

Introduction and Recommendations:

In 2020, SDG&E initiated a total of seven PSPS events. In one case, SDG&E combined three events into a single post event report. As a result, SDG&E submitted five post event reports to the California Public Utilities Commission (CPUC). The CPUC's Safety and Enforcement Division (SED) reviewed the submitted reports to evaluate SDG&E's compliance with the reporting requirements under Resolution ESRB-8, Decision (D.) 19-05-042 and (D) 20-05-051. The findings in this Post Event Report Review are based on the information presented in the post event reports and the public comments.

Table 1 - SDG&E PSPS Summary

Report #	Dates	Total Customers Notified	Total Customers De-energized	Medical Baseline Customers De-energized	Number of Counties De-energized	Number of Tribes De-energized
1	Sep. 8-9	16,761	49	6	1	0
2	Sep. 28-29	741	0	0	0	0
3	Oct. 26-27	21,481	4,373	211	2	3
4	Nov. 26 to Dec. 9	98,607	74,127	4,780	1	17
5	Dec. 23-24	31,444	6,797	477	2	10

data source: SDG&E 2020 PSPS post event reports and SDG&E's responses to SED's data requests.

SED has found several issues and concerns, and recommends SDG&E take corrective actions to comply with the guideline requirements.

Compliance Review:

The results of the review are presented below in the order the existing guidelines were published.

I. Resolution ESRB-8 Requirements:

1. *A notification to the Director of SED provided no later than 12 hours after the power shut-off.*

For all the events, SDG&E sent notifications to the Director of SED within 12 hours after the power shut-off.

2. *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*

SDG&E submitted most of the reports on time except for the November 26 - December 9 report. The report submitted to the Director of SED on December 23, 2020 covered three weather events. SDG&E combined the three events into one reporting without prior approval from SED. SDG&E did not meet the report deadline for two of the three events. See details below:

Table 2

Weather events	Event concluded	Report due dates	SDG&E's filing dates	Days Overdue
Nov. 26 - Nov. 28	Nov. 28	Dec. 11	Dec. 23	12
Dec. 2 – Dec. 5	Dec. 5	Dec. 18	Dec. 23	5
Dec. 6 – Dec. 9	Dec. 9	Dec. 23	Dec. 23	On time

3. *The report should include:*
 - a. *an explanation of the decision to shut off power;*

SDG&E reported that the decision to initiate a PSPS event was made at SDG&E's Emergency Operations Center (EOC). The EOC is staffed by a cross-functional team of electric operations, safety, meteorology, engineering, customer service, external affairs, communications, and other personnel, as well as a designated Utility Incident Commander (UIC). SDG&E considered multiple factors when making the decision to de-energize. In addition to local weather conditions, SDG&E closely monitored and took into consideration wildfire activity throughout the state and the availability of fire suppression resources to the region. Based on the information obtained and assessment, SDG&E determined if de-energization should be initiated for the events.

For SED's evaluation, refer to Section II. 2. a. (evaluation of D.19-05-042 – Phase I Guidelines).

- b. *all factors considered in the decision to shut off power, including wind speed, temperature, humidity, and moisture in the vicinity of the de-energized circuits;*

SDG&E considered various factors in the decision to shut off power including:

- Forecasted wind speed
- Red Flag Warnings issued by the NWS
- SDG&E's Fire Potential Index (FPI)
- Santa Ana Wildfire Threat Index (SAWTI)
- Live Fuel Moisture values
- The potential impact to customers with access and functional needs, including the number of Medical Baseline (MBL) customers
- A review of active outages on SDG&E's system
- Wildfire activity across the state and availability of fire-suppression resources

For SED's evaluation of the decision, refer to Section II. 2. a. (evaluation of D.19-05-042 – Phase I Guidelines)

- c. *the time, place, and duration of the shut-off event;*

SDG&E reported the time, place, and duration of the shut-off events.

- d. *the number of affected customers, broken down by residential, medical baseline, commercial/industrial, and other;*

SDG&E provided the total number of impacted customer meters broken down by residential meters, medical baseline accounts, commercial/industrial meters, self-identified vulnerable accounts¹, and PSPS critical facility meters.

- e. *any wind-related damage to IOU's overhead power-line facilities in the areas where power is shut off;*

¹ This was a term used by SDG&E as they did not specify if these are individual accounts or individual customers.

Among the five post event reports, SDG&E reported in the following two events, there were wind-related damages to its overhead power-line facilities

- November 26 – December 9
- December 23 – December 24

f. a description of the notice to customers and any other mitigation provided by IOU;

SDG&E reported it notified potentially impacted customers via outbound dialer, email, and personal phone calls. SDG&E also shared information on its websites (SDGEnews.com and SDGE.com), its social media channels of Twitter, Facebook, and Instagram, and with local, state, and national news media outlets.

For SED's evaluation of the customer notifications, see Section II.2.b and Section II.2.c. (evaluation of D.19-05-042 – Phase I Guidelines)

SDG&E reported the following mitigations:

- portable backup battery units
- generator installation
- sectionalization

g. any other matters that IOU believes are relevant to the Commission's assessment of the reasonableness of IOU's decision to shut off power.

SDG&E reported other matters in the following two reports:

- September 8 – September 9 Potential CAISO-directed load curtailments on Sept. 5–7 due to widespread excessive heat throughout the region. In addition, SDG&E worked with first responders and San Diego County Office of Emergency Services to provide assistance to first responders and communities.
- November 26 to December 9
Positive customer communications regarding the successful establishment of the temporary configuration for the microgrids

h. The local communities' representatives the IOU contacted prior to de-energization, the date on which they were contacted, and whether the areas affected by the de-energization are classified as Zone 1, Tier 2, or Tier 3 as per the definition in General Order 95, Rule 21.2-D.

SDG&E reported the organization and representative titles who were notified or contacted, the date and time the organizations and representatives were notified, and Tier classification of the areas affected.

- i. *If an IOU is not able to provide customers with notice at least 2 hours prior to the de-energization event, the IOU shall provide an explanation in its report.*

For SED’s assessment, see Section II. 2. c. (evaluation of D.19-05-042 – Phase I Guidelines)

- j. *The IOU shall summarize the number and nature of complaints received as the result of the de-energization event and include claims that are filed against the IOU because of de-energization.*

SDG&E provided the numbers of complaints and claims in each report, which is summarized in Table 3 below. Examples of the complaints are expressing unhappiness over the occurrence of PSPS events, the length and frequency of outages in their area, not being notified in advance of the event, and not being provided generators. The nature of the claims is mostly related to food loss.

Table 3

Dates	Number of Complaints	Number of Claims
Sep. 8-9	2	2
Sep. 28-29	0	0
Oct .26-27	0	2
Nov. 26-Dec. 9	60	326
Dec. 23-24	4	3
Total	66	333

- k. *The IOU shall provide detailed description of the steps it took to restore power.*

SDG&E provided a detailed description of the steps it took to restore power for each event, which were typically:

- Meteorology forecasted winds have peaked and are trending downward;
- Approval by Unit Incident Commander (UIC) to start patrols;

- Full patrol of the de-energized distribution circuit or transmission tie-line to inspect for damages;
- Electric Troubleshooter, observers and/or line crews on-site during re-energization process at key locations;
- Contract fire-fighting resources on-site during re-energization process;
- Check and ensure all personnel are in the clear before re-energization;
- Approval by UIC and Deputy Operations Chief—Electric prior to restoring the circuit/tie-line/device;
- Electric Distribution Operations/Electric Grid Operations directs switching to reenergize the line/segment and notifies EOC of time of re-energization.

1. *The IOU shall identify the address of each community assistance location during a de-energization event, describe the location (in a building, a trailer, etc.), describe the assistance available at each location, and give the days and hours that it was open.*

SDG&E reported the address, the location type, the assistance available, the days, and operation hours of each Community Resource Center (CRC). SDG&E offered the resources as “drive thru” services to maintain COVID-19 health protocols.

4. *The IOU shall notify the Director of SED, as soon as practicable, once it decides to de-energize its facilities. If the notification was not prior to the de-energization event, the IOU shall explain why a pre-event notification was not possible. The notification shall include the area affected, an estimate of the number of customers affected, and an estimated restoration time. The IOU shall also notify the Director of SED of full restoration within 12 hours from the time the last service is restored.*

Typically, SDG&E initially notified the Director of SED of a potential PSPS two to three days prior to the de-energization event. An update to the SED Director was also sent daily to include the area affected, an estimate of the number of customers affected and an estimated restoration time. SDG&E also sent the full restoration notice to the SED Director within 12 hours for the time the last service was restored.

II. D.19-05-042 – Phase 1 Guidelines

1. *In addition to submitting a report to the Director of the Commission’s Safety and Enforcement Division within 10 business days of power restoration, electric investor-owned utilities must serve their de-*

energization report on the service lists of this proceeding and Rulemaking 18-10-007 or their successor proceedings. Service should include a link to the report on the utility's website and contact information to submit comments to the Director of the Safety and Enforcement Division.

SDG&E timely and properly served the reports except for the November 26 - December 9 report. SDG&E served the report on December 23, 2020. As the report covered multiple events, SDG&E missed the deadline for the following events. See details under Section I. 2.

- November 26 – November 28
- December 2 – December 5

2. *In addition to the reporting requirements in Resolution ESRB-8, the electric investor-owned utilities must provide the following information:*

a. *Decision criteria leading to de-energization, including an evaluation of alternatives to de-energization that were considered and mitigation measures used to decrease the risk of utility-caused wildfire in the de-energized area;*

- 1) SDG&E reported it considered various factors in calling a PSPS event. It has not developed a specific PSPS algorithm that lists, quantifies and calculates the weight of each factor that is incorporated into a PSPS. SDG&E has developed and published information regarding the factors and weights that go into the determination of the fire environment severity which is included in the FPI and SAWTI sections of SDG&E's 2020 Wildfire Mitigation Plan (WMP). However, the information included in the FPI and SAWTI sections of SDG&E's 2020 Wildfire Mitigation Plan is not event-specific. Before the specific PSPS algorithm is developed, SDG&E must provide sufficient details regarding decision criteria and threshold for each event, including the shut-off threshold/criteria for Fire Potential Index, wind speed or wind climatology percentile, live/dead fuel moisture values and temperature.
- 2) SDG&E reported that once extreme fire risk weather conditions have materialized, alternatives to PSPS are limited. However, SDG&E did not provide the specific alternatives it considered for each event nor the evaluation of the alternatives.

b. *A copy of all notifications, the timing of notifications, the methods of*

notifications and who made the notifications (the utility or local public safety partners);

Upon the review of SDG&E's notification description and Appendix 1: Customer Notifications – Detailed Communications, SED noted the following issues:

- 1) There were instances that SDG&E did not meet notification requirements, including no advance notifications or no de-energization initiation notifications. These include:
 - September 8 – September 9:
 - i. No de-energization initiation notifications were sent to customers.
 - ii. No restoration completion notifications to public safety partners.
 - iii. No notifications were sent 1-4 hours prior for customers that would have occurred late at night or overnight.
 - October 26 – October 27:
 - i. About 1,466 customers did not receive any advanced notifications as weather forecasts did not indicate conditions potentially warranting PSPS in the impacted areas.
 - November 26 – December 9:
 - i. SDG&E only sent out the “overnight” notification. SDG&E did not send out the 1-4 hour imminent notifications to the customers.
 - ii. SDG&E was not able to provide notification to 4,465 customers. SDG&E stated these missed notifications may be attributed to non-communicative SCADA switches, which require SDG&E's Electric Distribution Operations to de-energize upstream of the intended sectionalizing device. Additionally, wind speeds exceeded their thresholds for several circuits and SDG&E did not have crews readily available on-site to de-energize the devices manually as weather conditions materialized. Further, some devices were not included in SDG&E's potentially impacted circuit list because initial weather forecasts did not indicate areas of concern for those circuits.
 - December 23 – December 24:
 - i. SDG&E only sent out the “overnight” notification. SDG&E did not send out the 1-4 hour imminent notifications to the customers.

- ii. SDG&E was not able to provide notification to 1,765 customers. SDG&E stated these missed notifications may be attributed to non-communicative SCADA switches, which require SDG&E's Electric Distribution Operations to de-energize upstream of the intended sectionalizing device. Additionally, wind speeds exceeded their thresholds for several circuits and SDG&E did not have crews readily available on-site to de-energize the devices manually as weather conditions materialized. Further, some devices were not included in SDG&E's potentially impacted circuit list because initial weather forecasts did not indicate areas of concern for those circuits.
- 2) SDG&E 's customer notifications did not contain the estimated start date and time, the estimated length of the de-energization event, and the estimated time of restoration.
 - c. *If the utility fails to provide advanced notification or notification according to the minimum timelines set forth in these Guidelines, an explanation of the circumstances that resulted in such failure;* SDG&E provides the following explanations for notifications not meeting the minimum timelines:
 - The PSPS event occurred overnight. In order not to wake up the customers, SDG&E chose not to send out the imminent notifications;
 - SDG&E's initially identified circuits for potential PSPS had been de-energized due to active fire;
 - Clerical error which was fixed later;
 - Unexpected weather change;
 - Non-communicative switches which require SDG&E's Electric Distribution Operations to de-energize upstream of the intended sectionalizing device.
 - d. *A description and evaluation of engagement with local and state public safety partners in providing advanced education and outreach and notification during the de-energization event;*

SDG&E described its engagement with public safety partners including the in-person and virtual training, education, and tours during the pandemic. It also described daily briefings with state and local governments, outreach to multiple CBOs. In addition, SDG&E reported the specific engagement activities during the three weather

events. Immediately following the PSPS event, SDG&E distributed a one-question online survey requesting public safety partners to rate SDG&E's level of engagement with their organization before and during the PSPS events. SED noted SDG&E did not report it conducted the survey after the September 28-29 PSPS event although there was no actual power shut off during the event.

- e. *For those customers where positive or affirmative notification was attempted, an accounting of the customers (which tariff and/or access and functional needs population designation), the number of notification attempts made, the timing of attempts, who made the notification attempt (utility or public safety partner) and the number of customers for whom positive notification was achieved;*

SDG&E reported that it successfully made affirmative notifications to medical baseline (MBL) customers who were not reached by phone. However, SDG&E did not report the number of notification attempts made to MBL customers and the timing of attempts.

- f. *A description of how sectionalization, i.e. separating loads within a circuit, was considered and implemented and the extent to which it impacted the size and scope of the de-energization event;*

SDG&E reported it used sectionalization to mitigate customer impacts and performed offloading of customers on circuits in certain areas forecast to experience the most severe fire risk conditions. In addition, SDG&E utilized sectionalizing devices to send warning messages and notifications of potential PSPS impacts to specific customer groups.

- g. *An explanation of how the utility determined that the benefit of de-energization outweighed potential public safety risks;*

SDG&E provided an explanation that the benefit of de-energization outweighed potential public safety risks. SDG&E stated it does not make the decision to de-energize lightly. Based on the best available information, SDG&E applies its judgment and experience to the situation at hand, with the safety of the communities and customers it serves, as well as its workforce, as top priority in the decision-making process.

- h. *The timeline for power restoration (re-energization,) in addition to*

the steps taken to restore power as required in Resolution ESRB-8;

SDG&E reported the date and time of “Authorization to Patrol” as well as circuit restoration date and time for all events.

i. *Lessons learned from the de-energization event;*

SDG&E reported lessons learned. The topics of the lessons learned are related to the conciseness of its PSPS notification message to avoid confusion with other emergency notifications, EOC shift changes should be timed to avoid peak PSPS condition, timing of customer message, communication with public safety partners at 72-hours, upgrades to circuit sorting criteria on PSPS dashboard, efficient way of quickly notifying key staff, , coordination of platform sync time, communication with CalOES, lack of staff resource, time crunch to prepare accurate PSPS report and additional public safety partner contacts.

j. *Any recommended updates to the guidelines adopted in Resolution ESRB-8 and this decision.*

SDG&E provided the following recommendations to the guidelines:

1. SDG&E requested clarification on false negative and false positive communications included in D.20-05-051.
2. SDG&E recommended that CRCs be activated within 12 hours of implementation of a PSPS event, where the duration is forecasted to exceed 24 hours.
3. SDG&E recommended excluding the customer count detail in the 72-hour prior notification. Instead, SDG&E suggests this information be provided beginning at the 48-hour prior mark.
4. SDG&E urged the CPUC to consider revising the currently mandated operational hours of the CRC activation to better align with actual usage and public need, which SDG&E believes is opening at 8 am and closing at 8 pm. SDG&E stated it has supporting evidence that PSPS impacted communities rarely use CRC resources between the hours of 8 pm – 10 pm. Of the 3,086 vehicles that visited SDG&E’s CRCs between November 26 – December 9, less than 1% visited a CRC during that timeframe. In total, 16 cars visited between 8 pm – 8:30 pm, while only one car visited after 9 pm.

III. D.20-05-051 – Phase 2 Guidelines

1. *CRCs shall be operable at least 8 AM-10 PM during an active de-energization event, with actual hours of operation to be determined by the local government in cases in which early closure of a facility is required due to inability to access a facility until 10 PM.*

SDG&E reported the CRC operating hours were 8 am – 10 pm.

2. *Each electric investor-owned utility shall ensure that electric service to impacted service points is restored as soon as possible and within 24 hours from the termination of the de-energization event, unless it is unsafe to do so. (D.20-05-051 at 6).*

SDG&E reports it was able to restore power within 24 hours of permission by the UIC to patrol for all events except one event. During the November 26 – December 9 multiple events, SDG&E was not able to safely re-energize one device within 24 hours of permission by the UIC to patrol. A portion of this circuit, affecting 146 customers, was restored after 24 hours due to the need for helicopter patrol. SDG&E explained that the helicopter assigned to this circuit was not able to fly due to unexpected mechanical issues and there was not enough daylight time to safely perform patrols using another helicopter.

3. *Each electric investor-owned utility shall enumerate and explain the cause of any false communications in its post event reports by citing the sources of changing data.*

SDG&E requests the CPUC's clarification on false communications. Nevertheless, SDG&E reported certain information based on its understanding. However, such false communication was not completely reported. SDG&E reported instances of the lack of advance notifications to customers whose power was shut off and certain explanation. See Section II. 2. c for details. For situations when customers were notified of de-energization but ended up no power shutoff, SDG&E did not enumerate nor explain the cause.

4. *Each electric investor-owned utility shall report on all potential or active de-energization events in its post event reports. These reports shall include a thorough and detailed description of the quantitative and qualitative factors it considered in calling, sustaining, or curtailing each de-energization event (including information regarding why the de-energization event was a last resort option) and a specification of the*

factors that led to the conclusion of the de-energization event.

SDG&E reported some qualitative and quantitative factors it considered in deciding the PSPS. SDG&E must develop a more thorough and robust data driven decision-making process, including comparing the predetermined threshold with forecast value and with the actual value for the quantitative attributes in the PSPS decision-making process and why the PSPS was a last resort option.