

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 31, 2021

Via Email Transmission Only

Stefan Bird
President and Chief Executive Officer
Pacific Power
825 NE Multnomah Street
Portland, OR 97232

Chris Alario
President
Liberty Utilities
701 National Ave, PO Box 107
Tahoe Vista, CA 96148

Paul Marconi
President
Bear Valley Electric Service, Inc.
42020 Garstin Dr. P.O. Box 1547
Big Bear Lake, CA, 92315

Re: *August 2021 Public Safety Power Shutoff Public Briefings*

Dear Mr. Bird, Mr. Alario, and Mr. Marconi,

Thank you for your company's informative presentations during the Public Safety Power Shutoff (PSPS) Public Briefings held by the California Public Utilities Commission (CPUC) on August 4, 2021. My fellow CPUC Commissioners and I, as well as the leaders who joined us from the California Governor's Office of Emergency Services (Cal OES), California Department of Forestry and Fire Protection (CAL FIRE), and Office of Energy Infrastructure Safety (OEIS), appreciate the information that you provided. It is critical that your company continues to inform our agencies and the public on the status of your preparedness for the 2021 wildfire season and potential PSPS events.

While PSPS is an effort to reduce the risk of wildfires caused by utility electric infrastructures, the shutoffs can result in numerous consequences, including public safety concerns. Under Public Utilities Code Section 451, an electric investor-owned utility (IOU) has the obligation to furnish and maintain service that is necessary to promote the safety, health, comfort and convenience of its customers, employees, and the public. It is imperative that the IOUs deploy PSPS as a measure of last resort, and only when the benefit of power shutoffs outweighs potential public safety risks. In 2020, either your company did not use PSPS or used it rarely.

With increasing drought and wildfire in 2021, each of your companies must learn from Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company's (SDG&E) experiences to fulfill your obligations under existing laws, rules, and directives during the 2021 wildfire season, including in the safe and competent execution of PSPS events.

A few questions were raised over the course of the August 2021 PSPS Public Briefings that require additional follow up from your company. For the safety and the well-being of Californians, I request responses and updates as set out below:

- PSPS Decision Making: An update on your company's plan to borrow and learn from PG&E, SCE, and SDG&E, and implement a more robust and sophisticated decision-making model.
- Medical Baseline Customers and Equipment: An update on your company's plan to expand medical baseline program and support these customers during PSPS events by offering transportation and lodging services. In addition, please describe any plans you may have to deploy batteries to these customers and educate them on operating the batteries.
- PSPS Exercises: An update on your company's plan to conduct functional exercises, not tabletop exercises. This is especially important due to your company's lack of experience in PSPS execution. Has your company conducted functional exercises specifically on operating Community Resource Centers (CRCs)? What actions are you taking to ensure CRCs will be operational, ideally located, and properly staffed if they are needed?
- Wildfire mitigation: Please provide an update on your planned vegetation management activities for this year. When will the work be completed?
- Access and Functional Needs (AFN) customers: How are you working to identify the number of AFN customers in your service territory beyond self-identification, especially in high fire risk areas?
- PSPS Thresholds: What is the range of wind thresholds at which you would consider calling a PSPS event? How is covered conductor increasing those thresholds? Please provide specific numbers.

Please respond by September 16, 2021 with a letter, including any necessary attachments, transmitted via email to my fellow CPUC Commissioners and me, with a cc to the service lists for R.18-12-005 and I.19-11-013 and the list of persons below. Our staff will follow up with you to address other questions that came up during the briefings. Additional questions may follow as needed.

Please know that my fellow CPUC Commissioners and I share a deep concern for the safety and well-being of Californians. We have high expectation of your companies during this 2021 wildfire and PSPS season.

Sincerely,



Marybel Batjer
President
California Public Utilities Commission

cc:

Service List for R.18-12-005 and I.19-11-013

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