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Contra Costa County



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April 28, 2020

President Marybel Batjer
Commissioner Liane M. Randolph
Commissioner Martha Guzman Aceves
Commissioner Clifford Rechtschaffen
Commissioner Genevieve Shiroma

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Public Comments on Rulemaking 18-12-005 – Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions

Dear President Batjer and Commissioners:

This letter is in response to the January 30, 2020, Administrative Law Judge's Ruling Requesting Comments on Proposed Additional and Modified De-Energization Guidelines. We believe that the proposed modified guidelines are an appropriate step in establishing the activities needed to ensure that utility public safety partners and electric utility customers receive the necessary resources from utilities before, during and after Public Safety Power Shut-off (PSPS) events.

We note that the proposed guidelines were developed before the COVID-19 pandemic and do not reflect new guidance from health officials for maintaining physical distance and related measures, which could affect the operation of community resource centers, restoration of electricity service, and other activities. The guidelines should be flexible enough to quickly incorporate the latest health guidance. It would be helpful for the utilities to publicly provide a list of critical infrastructure facilities that need to be handled differently in a PSPS, and to further identify changes necessitated by the current pandemic.

Contra Costa County (County) generally supports the proposed modified guidelines and appreciates the opportunity to provide public comments to the California Public Utilities Commission (CPUC) on this matter. The County also supports the comments submitted by the Joint Local Governments (attached) on behalf of the Counties of Kern, Marin, Mendocino, Napa, Nevada, San Luis Obispo, Santa Barbara, and Sonoma and the City of Santa Rosa. In addition to the comments submitted by the Joint Local Governments, we recommend the following:

Working Groups and Advisory Boards

- The Commission should consider requiring the investor-owned utilities (IOUs) take advantage of existing County Emergency Operations Center (EOC) and California Office of Emergency Services (CalOES) planning activities. IOUs should be required to participate in all existing EOC and CalOES planning meetings and as appropriate, integrate it with the proposed Working Group and Advisory Board process outlined by the Commission. Every county has a robust schedule of emergency response planning activities. Our experience has been that PG&E does not participate regularly in these existing venues. Please see the attached schedule as an example of the level of coordination that exists already. The Commission should take advantage of existing coordination venues before establishing new ones.

Local De-energization Exercises

- Investor-owned utilities should be required to participate in all De-energization Exercises conducted by local agencies, at minimum annually.

Who Should Receive Notice, When Should Notice Occur, and How Should Notice Occur?

- Contra Costa County supports the requirement for the utilities to maintain up-to-date websites. This information should be made available to the entire community and must be available in the languages spoken in each utility's service area. Because not all people have access to the internet, particularly historically underserved communities, this information should also be made available in appropriate languages by telephone, television, radio, social media, door-to-door notification, and other tested strategies for reaching diverse populations. The draft guidelines do not indicate when notice should be provided. More time to prepare is better. Contra Costa County suggests that two days minimum should be the goal for advance notification.

Community Resource Centers

- The draft Guidelines call on the utilities to establish community resource centers that "shall be operable 24 hours a day during an active de-energization event." The draft Guidelines envision these resources centers will be in recreational centers and public offices. Most of these local government facilities are neither staffed nor resourced to operate on a 24/7 schedule. If the Commission pursues this avenue, it should ensure that costs to operate and maintain community resource centers are borne by the utilities, and not by local governments.

Restoration of power service upon conclusion of public safety need for de-energization

- The Commission should consider issuing financial or other penalties to IOUs if power service is not restored within 24 hours following the conclusion of conditions that necessitated a de-energization event.

Thank you for allowing us to provide public comment on this matter. We look forward to working with the Commission, other stakeholders, and PG&E to ensure that PSPS events are better executed in the future.

Sincerely,



Candace Andersen

Chair, Board of Supervisors



CCC Office of the Sheriff – OES Activity Sheet



Updated as of March 5, 2020

Training and Workshop Opportunities

Class / Course	Date(s)	Location / Notes
Web EOC	As scheduled and requested	Varied
Developmental Disability First Responder Training	As scheduled and requested	Varied
Community Warning System Incident Commander Training	As scheduled and requested	Varied
CERT Train the Trainer	March 6 – 8 April 17 - 19	San Ramon San Jose
ICS 300	March 9 – 11	San Rafael
Redefining Mobility Summit	March 10	San Ramon *****Cost*****
Civilian Leadership Course for Public Safety Personnel	March 12	San Pablo *****Cost*****
Tactical Medicine / Lifesaver	March 16 – 18	Point Reyes
UASI Situational Awareness and Common Operating Picture for EOCs	March 17 - 18	CCC OES
UASI Basic Public Information Officer	March 23 – 26 (wait list)	Concord
UASI Advanced Public Information Officer (L0388)	March 23 June 15 - 19	San Jose Martinez
Contra Costa Crisis Center 2-1-1 Training	March 24 (10:00 AM – 11:30 AM)	Walnut Creek
General Ham Radio License	March 26	Walnut Creek
Extra Ham Radio License	August 11	Concord
UASI EOC Analyst	April 1 or April 29	Martinez
UASI Multi Hazard Planning for Schools (G364)	April 3	San Jose
UASI EOC Coordination	April 8	Martinez
UASI EOC Action Planning	April 15	Martinez
CERT Program Manager Training	April 15 – 16 June – July TBD	San Jose San Ramon
Worker Occupational Safety Health Training	April 30, May 7 and May 14	Martinez
CSTI Active Shooter PER 353	May 5 – 7	Lafayette
Mass Notification Conference	May 12 – 13	San Francisco
UASI All Hazards Incident Management Team (IMT305)	May 18 – 22	Martinez
CSTI Essential Emergency Management Concepts	June 22 - 25	Martinez
Senior Mobility Action Council Symposium Aging in the Bay Area	August 27	Pleasant Hill
Presbyterian Disaster Film Viewing	TBD	TBD

Exercises, Table Tops and Drills

Event	Date(s)	Location / Notes
Annual Shelter in Place School Drill	November 4	Varied
Bioterrorism Response (Anthrax)	November TBD	CC Health Services
Delta 5 County Flood Response Exercise	April / May 2021 TBD	Solano, Sacramento, San Joaquin, Yolo, CCC

Public Relations, Fairs and Outreach Opportunities

Event	Date(s)	Location / Notes
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American Red Cross Residential Smoke Alarm Installations	Second Saturday Monthly	Countywide
Mock Interviews for Sophomores	March 18 (8:30 AM – 11:00 AM)	Antioch High School
Environmental Health Branch Operations Center Open House	March 24 (9:00 AM – 11:00 AM)	Concord
Bike Rodeo and Safety Fair	April 25 (10:00 AM – 2:00 PM)	Bay Point
Disaster Preparedness for Congregations and Organizations	April 29 (6:30 – 8:00 PM)	Pleasant Hill
Morgan Territory Community Meeting	May 16 (10:00 AM – 1:00 PM)	Morgan Territory
Community Center Meeting	May 28 (6:00 – 8:00 PM)	Pacheco
Moraga Orinda Fire Station Open House	Spring 2020	Station 45
Developmental Disabilities Council Award Dinner	June 9 (6:00 PM)	Jack London Square
Kids and Rigs	July 28 (4:00 – 5:00 PM)	Moraga

Planning Efforts

Activity	Date(s)	Location / Notes
Local Hazard Mitigation Plan Update with 35 Planning Partners	January 30, 2018 April 10, 2018	FEMA approval pending BOS approval; 1 remaining adopter
East County Disaster Committee	March 5 (10:00 AM - 11:30) June 4, Sept 3 and Dec 3, 2020	Oakley – to be confirmed Brentwood, Antioch and Pittsburg
CCC VOAD General Membership	March 10 (1:00 PM) – every other month	Concord
Coastal Regional Haz Mat Response Organization (CRHMRO) and Local Emergency Planning Committee (LEPC)	March 11 (11:30 – 1:00 PM) 2nd Wednesday (11:30 AM – 1:00 PM)	CCC OES County Haz Mat, Martinez
Mutual Aid Regional Advisory Committee (MARAC)	March 11 (9:30 AM) 6/10, 9/9 & 12/9 2nd Wednesday Quarterly	TBD
Accessible Transportation Strategic Plan Technical Advisory Committee (TAC)	March 17 (2:30 – 4:00 PM)	Walnut Creek
CAER Emergency Preparedness and Outreach Team	March 18 (9:30 AM – 11:00 AM) 3rd Wednesday monthly, bi-mo. & quarterly	Martinez
American Red Cross External Relations Workgroup	March 18 (7:00 PM – 8:30 PM) 3rd Wednesday (December canceled)	Red Cross, Concord *****Volunteer Recruitment Ongoing*****
DWR Delta Work Group	March 19 (9:30 – 11:30) June 17	Sacramento Mather
Medical Reserve Corp (MRC)	March 21 (6:00 PM or Saturday 9 AM) 4/14, 5/12, 6/20, 7/14, 8/11, 9/19, 10/13, 11/10, 12/19	CCC EMS *****Volunteer Recruitment Ongoing*****
Senior Mobility Action Council	March 23 (9:00 AM – 11:00 AM) 4th Monday	Pleasant Hill
Developmental Disabilities Council (DDC)	March 25 (10:00 – 12:00 Noon) Typically, 4th Wednesday	RCEB Board seats available
American Red Cross Leadership Council	March 26 (9:00 – 11:00)	TBD
West County City Manager's Disaster Council	April 2 (2:30 – 4:00 PM) Quarterly	Richmond
Medical Health Coalition	April 15, 2020 (1:30 – 3:30 PM) July 15 and September 16	Martinez
Emergency Support Function (ESF) 1 Critical Transportation Workgroup	April 22 (9:30 AM)	CCC OES
Risk Management Safety Coordinators	April 22 (1:00 – 4:00 PM) July 22 and Oct 28, 2020 (w/ NWS)	EMS
Activity	Date(s)	Location / Notes
Interfaith Disaster Preparedness Network	April 23 (3:00 – 4:30 PM) June 25, August 27 and October 22 4th Thursday even months (No Dec. mtg.)	Pleasant Hill
Operational Area Council	May 6 (1:00 – 3:00 PM) Aug 5 and Nov 4, 2020	CCC OES

UASI Emergency Management Workgroup	May 7 (1:30 PM – 3:30 PM) August 6, November 5	Dublin
EOC D/AFN Coordinators	May 21 (9:00 AM) Aug 20 and Nov 19	CCC OES
UASI Public Health and Medical	May 28 (1:30 – 3:30 PM)	Dublin
Disability / AFN Steering Committee	June 11 (9:00 AM) December 10	CCC OES
CCHS Emergency Management Team Workgroup	Typically, the 2nd Monday (1:00 – 3:00 PM)	Martinez
CCC VOAD Executive Team	2nd Monday (10:00 AM)	Walnut Creek
Paratransit Coordinating Council	3rd Monday – Every other month (2:00 PM)	Walnut Creek
CCC OES Planner Meeting ESD All Staff Meeting	Typically, 1st Tuesday (8:00 AM) Begins at 9:00 AM	CCC OES
Bay Point Municipal Advisory Council	1st Tuesday (7:00 PM)	Ambrose Center, Bay Point
North Richmond MAC	1st Tuesday (5:00 PM)	North Richmond
UASI Training and Exercise	3rd Tuesday (10:00 AM – Noon)	Dublin
Community Awareness Emergency Response (CAER) Notification	Last Tuesday of each month (11:00 AM)	CCC OES
CCHS Epidemiology	1st Wednesday (8:30 AM – 10:00 AM)	Center Avenue, Martinez
Metropolitan Transportation Commission Satellite Phone Test	1st Wednesday (9:00 AM)	CCC OES Radio Room – <i>done by ACS volunteer</i>
Kensington Fire Protection District	2nd Wednesday (7:00 PM)	Kensington
El Sobrante Municipal Advisory Council	2nd Wednesday (7:00 – 9:00 PM)	Elks Lodge, El Sobrante
Lafayette Emergency Preparedness Commission	2nd Wednesday (7:00 PM)	Lafayette
Petrochemical Mutual Aid Organization (PMAO)	Usually 4th Wednesday (11:30 AM) (Except Nov & Dec)	Concord Hilton <i>Response agencies included quarterly</i>
(C-8) CCC City Citizen Corp Community Emergency Response Team Committee (CERT)	2nd Thursday (10:00 AM – 12:30 PM) Odd Months	San Ramon
Kensington Police Protection and Community Services District	2nd Thursday (7:00 PM)	Kensington
Diablo Fire Safe Council (DFSC)	3rd Thursday (9:30 AM – 11:30 AM)	Orinda at EBMUD HQ
Rodeo Municipal Advisory Council	4th Thursday (7:00 PM)	Rodeo
CalOES OASIS Phone Line Testing	Ad Hoc	CCC OES
OES GIS Workgroup	Ad Hoc	CCC OES
CC Supportive Communities	Ongoing	EHSD
SEMS Technical Advisory Committee	Ongoing	Cal OES
UASI Training and Exercise Program	TBD (2:30 PM)	Webinar or Dublin
Planning Section Workgroup	TBD	CCC OES
UASI Cyber Resilience	TBD (10:00 AM – Noon)	Dublin
County PIO Team	TBD (1:00 – 2:30 PM)	CCTV
UASI Public Information and Warning	TBD	
DWR Grant Flood Safety Plan	Deliverables being distributed	CCC OES

Websites

Address	Agency
www.211database.org	Contra Costa Crisis Center - Health and Human Services
www.bayareauasi.org	Bay Area Urban Area Security Initiative UASI Training Portal
www.californiavolunteers.org	California Volunteers
www.cccounty.us/RainMap	Contra Costa County Flood Control and Water Conservation District - Flood Forecasting
www.cchumane.org	Contra Costa Humane Society
www.cdss.ca.gov/dis	CA Department of Social Services – Functional Assessment Svc Team

www.contracostacart.org	Contra Costa Animal Services Community Animal Response Team
www.dfg.ca.gov/ospr	CA Department of Fish & Wildlife – Office of Spill Prevention & Response
www.dhs.gov	Department of Homeland Security
www.diablofiresafe.org	Diablo Firesafe Council
www.caloes.ca.gov	Governor's Office of Emergency Services
www.cchealth.org	CCHS Department includes all Divisions (Health Plan, EMS, Behavioral, Environmental, CCRMC, Hazardous Materials, Public, Health Housing and Homeless)
www.cococaer.org	Community Awareness and Emergency Response
www.cococws.us	Community Warning System
www.contracostacert.com	Contra Costa Community Emergency Response Team
www.contracostatv.org	Contra Costa Television Programming
www.crhmro.org	Coastal Regional Haz Mat Response Organization
www.csti.ca.gov	California Specialized Training Institute
www.fema.gov	Federal Emergency Management Agency
www.hseep.dhs.gov	Homeland Security Exercise and Evaluation Program
www.kcbs.com	KCBS Incident Information and Alerting
www.wildlife.ca.gov/ospr/drills-exercises	Office of Spill Prevention Response
www.redcross.org	American Red Cross
targetsolutions@riskm.cccounty.us	County Risk Management Training Courses

Contact Marcelle Indelicato at minde@so.cccounty.us or 925-313-9609 for more inf

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

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

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

**JOINT LOCAL GOVERNMENTS' OPENING COMMENTS
ON PROPOSED ADDITIONAL AND MODIFIED DE-
ENERGIZATION GUIDELINES**

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Dated: February 19, 2020

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

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

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

**JOINT LOCAL GOVERNMENTS' OPENING COMMENTS
ON PROPOSED ADDITIONAL AND MODIFIED DE-
ENERGIZATION GUIDELINES**

In accordance with the January 30, 2020 Administrative Law Judge's Ruling Requesting Comments on Proposed Additional and Modified De-Energization Guidelines, the Counties of Kern, Marin, Mendocino, Napa, Nevada, San Luis Obispo, Santa Barbara, and Sonoma and the City of Santa Rosa (the Joint Local Governments) submit their opening comments on the proposed changes to the Commission's de-energization rules.¹ Mendocino, Napa, and Sonoma obtained party status in the first phase of this proceeding by filing comments on the Rulemaking; Santa Rosa obtained party status in ALJ Semcer's March 20, 2019 email ruling; San Luis Obispo and Santa Barbara obtained party status in ALJ Semcer's October 16, 2019 email ruling; Marin obtained party status in ALJ Semcer's November 8, 2019 email ruling; Kern County obtained party status during the December 4, 2019 prehearing conference; and Nevada County received party status in ALJ Poirier's January 6, 2020 email ruling.

¹ Because the Joint Local Governments are located in the service territories of PG&E and SCE, these comments focus on those utilities' PSPS protocols.

I. INTRODUCTION AND SUMMARY OF RECOMMENDATIONS

The Joint Local Governments strongly support the proposed guidelines and appreciate the Commission's continued commitment to ensuring that utility public safety partners and vulnerable customers receive the necessary information, partnership, and mitigation from the utilities before, during, and after PSPS events. The success of the utilities' revised PSPS programs will ultimately be determined by the utilities' implementation of the Commission's directives, but the new guidelines do show that the Commission has taken seriously the input of local communities and impacted customers. To that end, the Joint Local Governments make the following recommendations to ensure the revised PSPS guidelines will, if implemented effectively, provide significant and achievable benefits to the utilities' customers and communities:

Pre-Fire Season Planning Activity Deadlines

- March 31, 2020: Utilities provide planning information to all local and tribal governments;
- April 30, 2020: Utilities provide full accounting of agreements with community-based organizations for Access and Functional Needs (AFN) individuals, and additional organizations and resources are identified;
- May 31, 2020: Utilities will have completed PSPS exercises with local public safety partners.

Working Groups and Advisory Boards

- The focus of the working groups should be identifying and developing going-forward improvements, not continued sharing of lessons learned from 2019;

- The utilities’ 2020 protocols should also include mitigation measures for AFN populations and for public safety partners;
- The working groups should also be a forum for local public safety partners and AFN representatives to troubleshoot the utilities’ revised PSPS protocols;
- “Regional” working groups should be defined with reference to county Operational Areas, but certain working groups may encompass multiple-county areas (e.g., north bay, east bay, north coast) to promote efficiency and encourage information-sharing. It is important, however, to take into account geographical and community-specific conditions when designing the working groups;
- The utilities must provide meaningful coordination and information-sharing to all local governments and tribes on request, not just those that experienced de-energizations in 2019, to promote local PSPS planning and response efforts;
- Working group participants should have the opportunity to provide written responses to the utilities’ monthly reports to the CPUC.

De-Energization Exercises

- Local governments must be treated equally with state agencies for purposes of emergency planning, including the same level of information-sharing and coordination from the utilities that CalOES, CalFIRE, and the Commission currently receive;

- PSPS exercises must be conducted according to Incident Command Structure protocols;
- The utilities' local operations personnel and EOC teams should spend time in local government EOCs during table-top exercises, drills, and/or EOC activations;
- The Commission's Safety and Enforcement Division and/or Wildfire Safety Division staff should spend time in local government EOCs during drills or events;
- The requirement that de-energization exercises consider worst-case scenarios is potentially problematic. De-energization exercises must be designed to meet local emergency managers' needs and must recognize the limitations of the utilities' experience and capabilities;
- The de-energization exercises should include at least one table-top and one functional exercise;
- Any AFN organizations or agencies that are partnering with the utilities to provide resources during PSPS events should be involved in the pre-fire season planning process.

Who Should Receive Notice When, and How

- Because the vast majority of public warning systems stop functioning when cell towers are down, the opportunities for planning communications strategies under these circumstances are limited. The utilities might consider investing in NOAA/NWS radios, which are designed to function during disasters;

- The “readability” requirements for PSPS materials must include accessible formats across all media platforms.

Community Resource Centers

- The utilities must work with local governments, state advisory boards, *and AFN representatives* to ensure that CRCs are designed and deployed to meet the needs of vulnerable customers;
- CRCs must provide charging resources for medical equipment, not just small electronic devices.

Medical Baseline and AFN Populations

- The requirement to develop an evacuation plan for AFN populations is infeasible, given the wide array of individual needs, specific community resources and local conditions, and the unknown footprint and duration of future PSPS events;
- Local stakeholders and utilities *can*, however, develop a robust information-sharing process to identify existing resources and agencies in a particular area and identify additional resources to meet unfilled needs;
- The utilities should also work with durable medical equipment providers, local health departments, medical care facilities, and other service and care providers to increase awareness of the medical baseline program and boost enrollment.

II. COMMENTS ON ADDITIONAL AND MODIFIED GUIDELINES

While the proposed revisions and new PSPS guidelines should, once implemented, improve the utilities’ PSPS programs and reduce impacts to the public, there

appears to be a timing problem. The new guidelines call for a number of working groups, committees, and monthly coordination meetings to put new protocols in place before the 2020 fire season (or before the first PSPS of 2020). The schedule for Phase 2 of this proceeding calls for a final Commission decision in May, which could leave as little as a month before PSPS events begin.² If the utilities wait until the requirements to collaborate with community stakeholders are officially adopted, the Joint Local Governments doubt that much progress will be made this year. It would be helpful if the Commission, utilities, and parties agreed to certain pre-decision deadlines to ensure improvements are in place in time. The Joint Local Governments recommend the following:

- By March 31, 2020: Utilities will have provided planning information to all local and tribal governments that request it. Planning information should include historical weather information and de-energization risk analyses, circuit and transmission configuration information, critical facilities, medical baseline and other vulnerable customers, and potential outage scenarios.
- By April 30, 2020: Utilities will have provided a full accounting of all agreements or partnerships in place with community-based organizations and other agencies to provide resources to AFN individuals during PSPS events. Based on that information, the utilities, local and tribal governments, public safety partners, and AFN representatives will have identified, to the extent possible, additional resources and agencies available to provide assistance to AFN populations during PSPS events.

² PG&E's first PSPS of 2019 began on June 8.

- By May 31, 2020: Utilities will have held a minimum of one table-top and one functional exercise with local governments and public safety partners. The exercises should be planned and conducted at the Operational Area³ (county) level, which will allow each Operational Area to coordinate with the necessary local stakeholders, such as cities, for attendance and participation. PG&E must not prioritize large-scale exercises with multiple local stakeholders over smaller-scale exercises with Operational Areas.

A. Working Groups and Advisory Boards

The Joint Local Governments strongly support the requirement that the utilities convene working groups with local and tribal governments, public safety partners, and representatives of AFN and vulnerable communities,⁴ though the working group framework needs a number of clarifications to ensure the meetings are productive. Many of the problems with the 2019 PSPS events were rooted in the fact that the utilities failed to meet with the communities they serve to understand the on-the-ground impacts of PSPS events, the specific community and population needs, and how close coordination before the fire season would result in safer and better-executed de-energizations.

The Joint Local Governments suggest that, instead of focusing on sharing lessons learned from the 2019 PSPS events, the working groups focus on identifying and developing going-forward improvements to the utilities' PSPS programs.⁵ The requirement that the utilities' protocols for 2020 include the provision of CRCs, communication strategies, information sharing, identification of critical facilities and AFN customers, and contingency plans is

³ See 19 Cal. Code Regs § 2409.

⁴ Proposed Guidelines, p. 1.

⁵ *Ibid.*

appropriate, though mitigation measures and resources for AFN populations and local public safety partners should also be included. The requirement that the utilities develop their de-energization protocols with feedback from the working group is important to the success of the utilities' 2020 PSPS programs.⁶ The Joint Local Governments recommend that the working group meetings also be a forum for local governments and tribes, public safety partners, and AFN representatives to discuss and troubleshoot the utilities' revised PSPS protocols. It is not enough that the utilities take feedback and interpret it on their own or in partnership with state agencies. The stakeholders that the utilities' improvements are intended to benefit must have a say in the development process, otherwise we will likely see a slew of unsuitable and unhelpful tools.

To ensure that the working groups are effective, a number of logistical and practical issues must be clarified:

Definition of "regional": There is an inherent difficulty in defining "regional" because local stakeholders have different geographic parameters for their jurisdictions and service areas. From an emergency management standpoint, a number of pre-defined regions exist in California. The county-level Operational Areas are at the more granular end of the spectrum, while CalOES has three large regions that cover the entire state (Coastal, Inland, and Southern) and six mutual aid regions within those larger regions.⁷ While the state and local emergency management regions dictate the structure by which incidents are handled by and between state and local agencies, the regions do not necessarily correlate to tribal lands or to the areas served by community-based organizations. Based on the principle that all emergencies are local, the Joint Local Governments recommend that "regional" be defined with reference to

⁶ *Ibid.*

⁷ See CalOES *Regional Operations* website: <https://www.caloes.ca.gov/cal-oes-divisions/regional-operations>.

county boundaries, but the working group may encompass multiple-county areas (e.g., north bay, east bay, north coast) to promote efficiency and encourage information-sharing, and to better reflect the service areas of local organizations and tribal jurisdictions. It is important, however, to take into account geographical and community-specific conditions when designing the working groups. For example, the drive times for Kern County’s Office of Emergency Management staff and other stakeholders to attend meetings in neighboring counties is prohibitive, whereas it may be less onerous for stakeholders in the north bay region.

Utility attendees: It is critical to the success of any PSPS working group, practice exercise, or planning meeting that PG&E and SCE send the right delegates. At a minimum, the utilities need to send *local* operational staff who know the local electrical systems and how they impact the community, EOC staff who are responsible for coordinating with or providing information to local governments and public safety partners, and the public safety partners’ dedicated points of contact. The utilities cannot simply send their local government affairs reps, as they did to little effect during the 2019 PSPS education campaigns. Local governments and stakeholders will ensure that their own delegates have the requisite knowledge and expertise to make the meetings worthwhile.

Leveraging existing stakeholder committees: The local stakeholders identified in the proposed guidelines already have a number of existing committees, working groups, boards, and professional associations that meet regularly. For example, the California Emergency Services Association is a statewide professional organization dedicated to promoting mutual support and cooperation in preparing for public emergencies. Napa County’s Public Health Officer is on the Board of the California Conference of Local Health Officers (CCLHO), which is a statewide organization. At the local level, Sonoma County has the Sonoma County AFN

Committee, the Sonoma County Shelter Council (which frequently discusses residents' medical needs), the Sonoma County Operational Area–Emergency Coordinators Forum, the Sonoma County Healthcare Coalition–Healthcare Forum Meeting (for Emergency Managers, Public Health Officers, hospitals, hospices, and many skilled nursing facilities), the Individuals with Developmental and Neurological Disabilities Advisory Committee, and the Countywide Quarterly Meeting of Emergency Public Information Officers. Additionally, the Napa Valley Community Organizations Active in Disaster (COAD) has Public Information & Outreach and AFN/Shelter & Care Subcommittees. Other counties have COADs or volunteer organizations (VOADs), as well. While it is likely not feasible or necessary to involve every established organization in the regional working group process, the expertise and preexisting organizational structures these groups offer should be leveraged using delegates or other means of coordination, either as part of the working group process or the advisory board process.

Partnership with all local governments: It is also important that the utilities provide meaningful coordination and information-sharing with local governments that were not de-energized in 2019. PG&E expanded its PSPS program in 2019 so that the entirety of its service territory is at theoretical risk of de-energization.⁸ Many communities outside the high fire threat areas are connected to PG&E transmission lines that run through high fire threat areas. Cities and counties all over the state are trying to develop PSPS preparedness plans and to understand the potential impacts to their communities from a de-energization event, and to do that they need information from the utilities. San Luis Obispo County, for example, was stymied in its planning efforts in 2019 because PG&E was reluctant to provide information on potentially impacted medical baseline customers—despite the fact that the County signed PG&E's NDA—because San Luis Obispo was not in immediate danger of experiencing a PSPS. While PG&E

⁸ PG&E 2019 Wildfire Mitigation Plan, p. 96.

did eventually provide some information to assist the County in its planning efforts, the process of obtaining that information was difficult. In 2020, the Commission must ensure that the utilities provide planning information to local governments on request.

The requirement that the utilities report monthly to the Commission on their progress with the working groups is also critical.⁹ Given the difficulties the utilities experienced in implementing the 2019 PSPS requirements, it is important that the Commission monitor implementation of the 2020 requirements closely and that the utilities have incentives to make the most of the working group process. The non-utility working group participants should also have the opportunity to provide written comments on the utilities' reports if they feel the reports are not accurate. A 10- or 15-day comment period would be acceptable.

The Joint Local Governments support the proposed requirement that the utilities also coordinate advisory boards comprised of public safety partners, local and tribal government officials, business groups, non-profits, AFN and vulnerable community representatives, and academic organizations to advise on best practices for wildfire issues, safety, community preparedness, regional coordination, and the use of emerging technologies.¹⁰ Meaningful wildfire and de-energization reductions will not be achieved by relying solely on the utilities to provide solutions.

B. De-Energization Exercises

The importance of in-person exercises and functional drills to prepare for de-energization events cannot be overstated. Professional emergency management and response agencies routinely refresh their training and certifications, participate in table-top exercises, drill with other agencies, and refine their protocols in response to issues that arise during the

⁹ Proposed Guidelines, p. 1.

¹⁰ Proposed Guidelines, pp. 1–2.

simulated emergencies. The utilities are now in the emergency management business and must begin doing the same. The Joint Local Governments strongly support the requirement that the utilities collaborate with state and local emergency response officials to plan annual de-energization exercises.¹¹ The Joint Local Governments also support the proposed activities to be included in the table-top exercises, and recommend that additional issues or activities should be added as necessary to address local conditions or population demographics.

Local governments take the brunt of the utilities' emergency management shortcomings and are, by default, left to ensure the safety and wellbeing of the utilities' customers. To ensure that the de-energization exercises provide the maximum benefit to local governments before the 2020 fire season, some additional terms and clarifications to the proposed guidelines are necessary.

First, it is imperative that local governments be treated equally with state agencies for emergency planning. In 2019, PG&E routinely provided the state agencies with the highest-quality information, on the fastest timeline, and appeared to only engage in meaningful coordination with state agencies.¹² As we saw, the result of leaving local governments out of the room was disastrous. It is also the Joint Local Governments' understanding that PG&E cancelled table-top exercises with local governments at the behest of CalOES¹³; that decision was made without consulting the impacted local governments and those exercises were never rescheduled. The bedrock principle of emergency management is that all emergencies are local and all emergencies are therefore managed at the local level. In 2020, the utilities' and the state agencies' emergency planning and coordination activities must actually reflect the fact that, when the utilities turn the power off this fall, city and county emergency managers will be in

¹¹ Proposed Guidelines, p. 2.

¹² See, e.g., PG&E Advice Letter 4117-G/5582-E.

¹³ See Joint Local Governments' Reply Comments on Proposed Decision (R.18-12-005), pp. 3-4.

charge of on-the-ground response and public safety. The proposed guidelines should be revised to make it clear that local governments will receive the same level of information and coordination from the utilities as CalOES, CalFIRE, and the Commission itself.

Second, the exercises should be conducted using established emergency management programs, such as SEMS or FEMA’s training programs. The utilities cannot devise emergency response protocols of their own for purposes of these exercises. One of the largest issues in the 2019 events was the fact that PG&E did not speak the same language as its state and local emergency management partners. The exercises must follow Incident Command Structure protocols, the participants must agree on the content, and the exercises must be facilitated by experts.

Third, requiring that exercises consider worst-case scenarios for de-energization is potentially problematic.¹⁴ The planning exercises in 2020 must establish a baseline for communication and operational competence between the utilities and local emergency managers, particularly for PG&E. The scale and complexity of the exercises must be realistic. If the utilities interpret “worst-case scenario” to mean replicating the largest October 2019 outage, without first having engaged in individual county-level exercises to solidify the working relationship between the utility and local Office of Emergency Management, the large-scale exercise will be a disaster. A worst-case scenario for individual counties is a more feasible exercise to orchestrate, but regardless of the scenario, the trite-but-true adage that you cannot run before you can walk has to govern the PSPS exercises. If PG&E and SCE attempt exercises they are not prepared to orchestrate, nobody will benefit and nothing will improve. The Commission should leave the scale of the exercises to be determined between local emergency managers and their utilities, to ensure that local emergency planning needs are met.

¹⁴ Proposed Guidelines, p. 2.

Fourth, local utility operations personnel and EOC teams should spend time in local government EOCs during table-top exercises, drills, or, if possible, EOC activations. Seeing how fellow agencies operate during simulated or actual events provides significant insight into the type of coordination and information that is most useful during a crisis. The Joint Local Governments recommend that Safety and Enforcement Division and/or Wildfire Safety Division staff also spend time in local EOCs during drills or events. The Commission embedded liaisons in PG&E's EOCs during PSPS events in 2019; those liaisons should see the other half of the de-energization picture.

Fifth, any community-based organizations or other agencies the utilities are partnering with for AFN customer support and resources should be involved in the pre-fire season planning. As a threshold matter, it is critical that local governments know which organizations the utilities are working with and what resources those organizations are prepared to provide. In 2019, PG&E's partnership with the California Foundation for Independent Living Centers (CFILC) was barely publicized above a rumor, and the Joint Local Governments never learned which Independent Living Centers were participating, what resources they could offer, or whether AFN residents knew that the resources were available or how to access them. Not only does this prevent individuals from accessing resources, but it makes emergency planning difficult. Local governments strive to provide resources they know residents need and cannot obtain elsewhere. It is also important to establish lines of communication between the utilities, local governments, and the agencies that will provide resources and assistance to AFN individuals during de-energizations. This will allow better communication and information-sharing before, during, and after PSPS events, which will benefit everyone.

Sixth, it should be clear that the de-energization exercises include both table-top exercises and functional drills or exercises. Table-top exercises are discussion-based sessions in a less formal classroom setting where participants discuss their roles during an emergency and their response to a particular emergency situation. A facilitator guides participants through a discussion of one or more scenarios. Functional exercises involve a simulated “operational environment,” or emergency, that allow participants to validate plans and readiness by performing their duties in a simulated setting. Functional exercises are designed to exercise specific team members, procedures, and resources, such as communications, warning, notifications, and equipment set-up. Both types of exercises are necessary, and the guidelines should require both.

C. **Who Should Receive Notice, When Should Notice Occur, and How Should Notice Occur?**

The Joint Local Governments support the requirement that the utilities develop communication and notification plans with local authorities that anticipate the disruption of traditional communication channels.¹⁵ Losing communications networks during PSPS events poses a grave threat to public safety and is one of the primary worries for local governments. The Joint Local Governments also support the requirement that the utilities provide communications carriers with the meter and circuit IDs to be de-energized and re-energized, to ensure that the communications carriers receive actionable notification information and are able to deploy backup resources to minimize the PSPS impact.¹⁶

While the Joint Local Governments support in principle the proposed requirement for the utilities to leverage public alert systems, public radio broadcasts, and neighborhood patrols in de-energization event areas in situations where internet, cellular, or landline-based

¹⁵ Proposed Guidelines, p. 2.

¹⁶ Proposed Guidelines, p. 4.

communication services are limited,¹⁷ in practice there may be significant limitations. If cellular towers are down, most public alerting tools and internet are also offline. Landlines and local terrestrial radio may still function, assuming the communications infrastructure supporting those technologies is still operating, but the other forms of communication—including emergency alert systems—will not. To address this issue, the utilities may need to invest in NOAA/NWS radios,¹⁸ which are designed to remain operable during all hazardous events. The feasibility and efficacy of neighborhood patrols will depend on the individual community, and therefore cannot be counted on as a widely available solution to communications infrastructure outages.

The proposed guidelines that require the utilities to ensure that their websites are robust enough to remain operable during PSPS events are excellent,¹⁹ as are the requirements to prioritize ease of readability and comprehension for notifications, and to coordinate with the media and community-based organizations to promote consistency in messaging.²⁰ It is important, however, that notifications be “readable” in accessible formats across all media platforms. The utilities experienced chronic issues with providing fully accessible PSPS materials in 2019,²¹ which is an issue that must be addressed before the next wave of PSPS events begins.

D. Community Resource Centers

The requirement that the utilities collaborate with stakeholders to design, test, and execute a plan, based on local demographic and survey data, to provide Community Resource

¹⁷ *Id.* at pp. 2–3.

¹⁸ See the NOAA Weather Radio All Hazards website:
https://www.weather.gov/nwr&ln_desc=NOAA+Weather+Radio/.

¹⁹ Proposed Guidelines, pp. 2–4.

²⁰ *Id.* at p. 3.

²¹ See, e.g., Center for Accessible Technology Response to PG&E De-Energization Report for November 20, 2019 Event, pp. 5–6; Center for Accessible Technology Response to SCE De-Energization Report for November 23–26, 2019 Event, pp. 3–4.

Centers (CRCs) that meet the safety needs of vulnerable populations should be adopted.²²

PG&E had a number of issues with its deployment of CRCs in 2019, including inappropriate site choices, failure to provide resources for individuals with electricity-dependent medical equipment, limited operating hours, and failure to adequately coordinate with local governments.²³ SCE's mobile charging vehicles and CRCs also failed to provide charging resources for most AFN individuals.²⁴ To ensure that, going forward, CRCs are designed and deployed to meet the needs of vulnerable customers, the utilities must work with local governments, state advisory boards, *and AFN representatives*.²⁵

The Joint Local Governments strongly support the requirement that CRCs be open 24 hours a day during active de-energization events.²⁶ The CRCs must also provide charging resources for medical equipment. Many medical devices take hours to fully charge, and CPAP machines and other equipment often must be plugged in overnight to continue functioning. It is also important to provide a climate-controlled place for individuals who have lost power in their homes. High daytime temperatures and low overnight temperatures pose a serious risk to infants, the elderly, and people with certain medical conditions. Due to the potential for multiple de-energization events in a short period of time, the possibility that events may last multiple days, and the potential for huge geographic areas to be impacted, it is not reasonable to expect that individuals who need constant electricity supply will be able to pay for hotel rooms or find alternative accommodations. The CRCs must provide a safe, energized place for communities.

²² Proposed Guidelines, p. 4.

²³ See, e.g., I.19-11-013, Joint Local Governments' Response to OII, pp. 74–75.

²⁴ *Ibid.*

²⁵ Proposed Guidelines, pp. 4–5.

²⁶ *Id.* at p. 5.

E. Restoration of Power Service Upon Conclusion of Public Safety Need for De-Energization

The Joint Local Governments support the requirements that the utilities ensure power is restored within 24 hours of the “all clear” for a weather event.²⁷ The requirement to inform public safety partners within one hour of restoration, and to inform them before the general public, is also important. Public safety partners must ensure that their facilities are ready for re-energization, as re-energization can damage equipment, and local governments need advance notification to ensure that they can provide accurate information to the public.

F. Transportation Resilience

Loss of power to transportation corridors, major and minor, creates significant public safety risks and increases the number of vehicle accidents. Similarly, de-energization of other major transportation resources—rail, aviation, maritime—creates safety risks and can have large economic impacts. The Joint Local Governments support the requirements that the utilities implement a transportation resiliency taskforce to identify transportation infrastructure and corridors throughout the state that need backup generation.²⁸ The proposed requirement that the utilities develop and execute a plan to provide electric vehicle fast charging by the 2021 fire season should also be adopted.²⁹ These measures should be implemented, however, at the expense of resources for individuals without personal vehicles or access to reliable transportation.

G. Medical Baseline and Access and Functional Needs Populations

The proposed collaboration between the utilities, AFN advocates, public safety partners, and local governments to conduct a needs assessment identifying AFN populations’

²⁷ Proposed Guidelines, p. 5.

²⁸ *Id.* at pp. 5–6.

²⁹ *Id.* at p. 6.

needs during PSPS events, and identifying current and unsubscribed medical baseline customers appears to be a good starting point for reducing the impacts of PSPS events on AFN populations.³⁰ The monthly and annual reporting requirements should also be adopted.³¹ The Joint Local Governments look forward to hearing the thoughts and recommendations of AFN advocates and other public safety partners regarding the sufficiency of the proposed guidelines and what improvements are necessary.

The Joint Local Governments are concerned about the potential requirement to develop an evacuation plan for AFN populations.³² Developing an evacuation plan for specific populations comprised of thousands of individuals with a wide variety of specific needs is not likely to be feasible—there are too many variables, including the footprint and duration of a given PSPS event. What local stakeholders and the utilities *can* do is develop a robust information-sharing process to identify the existing resources and agencies in a particular area, understand the limitations on those resources, identify additional resources and agencies that can provide assistance, and ensure that AFN populations know what resources are available and how to access them.

The Joint Local Governments also recommend that the utilities also work with durable medical equipment providers to increase awareness of the medical baseline program, provide access to application materials, and facilitate the enrollment process in conjunction with the doctors that prescribe medical equipment. As part of the local government coordination, the utilities should also work with local Health and Human Services departments, medical care facilities, dialysis centers, assisted living facilities, and other service and care providers to

³⁰ *Id.* at pp. 6–7.

³¹ *Id.* at p. 7.

³² *Ibid.*

improve identification and outreach to medically vulnerable individuals regarding PSPS preparedness and resources.

H. Transparency

The Joint Local Governments support the requirement that detailed quantitative and qualitative information about PSPS events be provided on utility websites, and that comprehensive information on PSPS mitigation efforts be provided year-round.³³ The proposed utility de-energization roadmaps³⁴ should, if adopted, provide public safety partners and the public with information that will inform local and individual resiliency planning, which will ultimately help reduce the impacts of PSPS events.

I. Definitions

The Joint Local Governments strongly support the inclusion of 911 emergency services in the definition of critical facilities.³⁵ The requirement that 911 emergency services also receive any additional assistance necessary to ensure resiliency during PSPS events must be adopted.³⁶ The continuous operation of 911 emergency services during de-energizations is necessary for ensuring public health and safety.

The Joint Local Governments also support the inclusion of the transportation sector in the list of critical facilities.³⁷

III. CONCLUSION

The proposed new and revised guidelines are excellent and, with some clarifications and adjustments, should improve customers' and communities' experiences with the utilities' PSPS events going forward—if the utilities implement the guidelines properly. The

³³ Proposed Guidelines, pp. 7–8.

³⁴ *Id.* at p. 8.

³⁵ *Ibid.*

³⁶ *Ibid.*

³⁷ *Ibid.*

Joint Local Governments look forward to working with the Commission, other stakeholders, and PG&E and SCE to ensure that future PSPS events are better executed and less harmful.

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