



Small Business Utility Advocates
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July 1, 2021

Via Electronic Mail

To: Marcie Edwards, Chair, Wildfire Safety Advisory Board (wsab@energysafety.ca.gov)
From: Ariel Strauss, Regulatory Counsel, Small Business Utility Advocates
Re: **Request to Hold Workshops on Analysis of PSPS Risks**

Dear Chair Edwards and members of the Wildfire Safety Advisory Board:

Small Business Utility Advocates (SBUA) submits this letter to request that the Board urgently hold workshops to facilitate publicly-owned utilities collecting and analyzing data on the risks posed by public safety power shutoff (PSPS).

On June 23, 2021, SBUA submitted comments on the Board's *Draft Recommendations on the 2022 Utility Wildfire Mitigation Plan Guidelines, Performance Metrics, and Safety Culture Assessment* (Recommendations). The SBUA comments expressed support for the recommendations generally and suggested that

“utilities implement data collection mechanisms to facilitate reporting of adverse events caused by PSPS de-energization and undertake or commission a detailed study of the public safety consequences and economic costs that have resulted and may flow from PSPS de-energization.”

At the June 28th Board meeting, SBUA summarized its proposal in public comment. The Board discussed SBUA's suggestion and ultimately declined to amend the Recommendations based on the Chair's observation that the Board was not prepared to propose a specific methodology for data collection, that the minutes would reflect a sense of the Board that data collection is necessary to conduct reasonable risk analysis of PSPS and that the Board can itself hold workshops to develop data collection and analysis methods.

On June 7, 2021, the Public Utilities Commission (CPUC) issued its decision declaring that in 2019, “PG&E, SCE, and SDG&E failed to comply with the obligation in Pub. Util. Code § 451 to promote safety of customers” because they did not “identify, evaluate, and weigh the

potential for harm to their customers resulting from a proactive de-energization” (D.2106014, Conclusion of Law No. 12) and “if utilities had engaged in this analysis, their implementation of the 2019 PSPS events may have been more targeted and the resulting harms to customers may have been reduced.” (Id., p. 59.)

However, the weighing of de-energization risks prior to initiation of PSPS cannot be done competently without consideration of the consequences. The fact that PSPS has been in widespread use since 2019 and the utilities have, in response to SBUA communications in 2021, categorically declined to undertake any analysis of PSPS risks and harms is itself troubling. At this point, a considerable body of historic data on risks and harms that transpired during past PSPS events must now exist but has not been analyzed.

Presently, no CPUC proceeding contemplates holding workshops or taking other action to assist utilities to develop methods of assessing outcomes and risks from de-energization. The Recommendations correctly point out the need to treat PSPS as a risk, not just a risk mitigation tool. With the ongoing drought and approaching hotter months, PSPS events should be expected at any time.¹ Developing usable and reliable PSPS risk assessment models is a matter of utmost urgency. The WASB possess the appropriate expertise and is best positioned to address this issue.

SBUA requests that the holding of workshops be among the Board’s first order of business within the Office of Energy Infrastructure Safety. Please keep me informed of developments in this regard and contact me if I can be of any assistance.

Sincerely,



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CC: Service List for CPUC Proceeding R.18-10-007 (e-mail only)

¹ As recently as June 14th, Southern California Edison (SCE) initiated a PSPS notification protocol in Santa Barbara County but ultimately humidity levels were higher than anticipated and SCE did not de-energize any customers.