

**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.

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Rulemaking 18-12-005

**NORTHERN CALIFORNIA POWER AGENCY COMMENTS ON PUBLIC SAFETY  
POWER SHUT-OFF PHASE 2/TRACK 1 PROPOSALS**

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In accordance with the California Public Utilities Commission (Commission) Rules of Practice and Procedure and direction provided in September 26, 2019 and October 8, 2019 Rulings issued by Administrative Law Judge Semcer, the Northern California Power Agency (NCPA)<sup>1</sup> offers the following comments on the Phase 2/Track 1 comments and proposals submitted on September 17, 2019. On February 8, 2019, NCPA filed comments on the Rulemaking Order, thereby becoming a party to the proceeding at that time.

**I. INTRODUCTION**

NCPA recognizes that these comments are being offered at a time when the state – and particularly those in Northern California – are still dealing with the aftermath of the recent widespread public safety power shut-offs (PSPS). The impacts of those events and lessons learned by the utilities and affected customers alike will be critically important in further framing this discussion and the refinement of the existing de-energization protocols. NCPA is responding to the issues raised in the parties' September 17, 2019 filings in an attempt to further shape the scope of upcoming workshops that will inform that process, and not to the specific events surrounding the PSPS events that began on October 9, 2019. However, the recent events are germane to many (if not all) of the Phase 2/Track 1 issues; for that reason, the Commission should incorporate the utilities' post-PSPS event reports into the formal record for this

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

proceeding, as well as the comments provided in direct response to those reports. That information, coupled with parties' responses to the September 17 filings, will further inform the workshop discussions and development of appropriate protocols for PSPS events, including both de-energization and re-energization.<sup>2</sup>

## **II. RESPONSE TO COMMENTS AND PROPOSALS**

### **A. Definition- Critical Public Service Provider.**

NCPA members include publicly owned utilities (POUs) and municipal entities that are connected to PG&E's transmission system at levels of 60 kilovolts (kV) or higher. NCPA owns and operates electric generating plants that are connected to PG&E's transmission system. And while getting the right notification at the right time is important for all stakeholders, NCPA notes that when an IOU de-energization event impacts the power supply to a POU, the entire POU would essentially be de-energized. For these utilities, receiving timely notification of a *potential* PSPS event is critically important, as the POUs must then prepare for de-energization of their service territories and notify their own customers with as much lead time as possible. For that reason, entities such as POUs that would be impacted to such an extent by a PSPS event must be notified whenever a PSPS is possible – not just probable. To that end, priority notification may be facilitated if the utility is able to distinguish between different types of public safety partners that could be impacted by a PSPS event. The existing PSPS protocols require priority notification for public safety partners and critical facilities. However, noting that some public safety partners are also critical facilities (like POUs), PG&E has recommended that entities that are both a public safety partner and a critical facility be identified as a "Critical Public Service Provider."<sup>3</sup> To the extent that creating this distinction could facilitate priority notifications by identifying entities based on the magnitude of impact, NCPA supports the creation of a definition that distinguishes public safety partners that are responsible for critical facilities. This special designation and higher priority notification for these entities is warranted based on the extent of the impact and heightened public safety considerations.

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<sup>2</sup> These comments are not intended to specifically address any of the events that occurred during the PG&E PSPS event that began on October 9, 2019; if warranted, NCPA will provide comments on the final Post-PSPS Event Report PG&E is required to submit 10 days after the conclusion of the event.

<sup>3</sup> PG&E Phase 2/Track 1 Opening Comments, September 17, 2019, p. 4.

**B. What voltage level should be used to designate “distribution” versus “transmission” for PSPS events?**

While the magnitude of impact from a PSPS event may not be determined solely based on the size of the power line that is being de-energized, the potential for greater disruption from de-energizing higher-level voltage lines exists. For that reason, the PSPS protocols should make a distinction between transmission and distribution events to facilitate notification and planning. The commenting parties offered a number of different alternatives for how to define transmission versus distribution lines, and it may be that a single, statewide designation is inappropriate. For example, PG&E uses 60kV and suggested that the Commission use this value for its service territory.<sup>4</sup> Some parties advocated for a functional test that looks at the type of facilities being served and the magnitude of the impact. The Public Advocates recommended that the Commission adopt the NERC threshold of 100 kV.<sup>5</sup> NCPA does not believe that the NERC threshold should be adopted. As NCPA has previously noted, if the statewide distinction between transmission and distribution lines is based on a 100kV bulk electric system threshold, IOU customers like POU and electric cooperatives that receive transmission service on 60kV power lines could actually be deemed distribution customers; this may occur since 60kV is seen as a distribution-level voltage even if the POU or electric cooperative is actually a PG&E transmission-level customer.<sup>6</sup> Creating a different definition for the PSPS than the one the utility already employs could result in needless confusion. For example, PG&E has two Grid Control Centers; one for distribution lines less than 60kV and one for transmission lines of 60kV or above. If the NERC standard were adopted for PG&E’s service territory, POU operations engineers would need to coordinate with two separate points of contact during a PSPS event. To promote efficiencies and avoid creating even more uncertainty and potentially wasting time during these critical events, there should be just a single point of contact during a PSPS event.<sup>7</sup>

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<sup>4</sup> PG&E Phase 2/Track 1 Opening Comments, September 17, 2019, p. 3.

<sup>5</sup> Public Advocates Office Phase 2/Track 1 Opening Comments, September 17, 2019, p. 1.

<sup>6</sup> Northern California Power Agency Comments on Assigned Commissioner’s Scoping Memo and Ruling, dated March 25, 2019, p. 2.

<sup>7</sup> As NCPA plans to address in the comments on PG&E’s post-PSPS event report, the need for a single point of contact and clarity regarding that contact was highlighted during the October 9 PSPS event. During the recent PSPS, despite pre-event direction from PG&E that the PG&E Grid Control Center would be the “single point of contact” during a PSPS event, when NCPA contacted the Control Center during the PSPS, it was determined that PG&E’s Grid Control Center has twelve desks and an operator on each desk that only has information about a

With that said, a single definition may not be appropriate statewide; however, since it is imperative that entities know if their potential de-energization event would be triggered by a transmission versus distribution line, the Commission should require that each IOU formally set a threshold for making that determination. For PG&E's service territory, that designation should be set at 60 kV.

To ensure that there is a common understanding of the distinction and threshold, NCPA agrees, as suggested by several parties, that this issue should be further addressed in workshops. This is particularly important in the context of defining appropriate notification protocols for transmission-level customers, regardless of where that demarcation is set for each IOU service territory. As PG&E notes, the existing notification process and FERC standards of conduct, for example, are different for transmission events than for distribution events.

**C. PSPS Strategy and Decision-Making; Would adopting standardized wildfire risk criteria (e.g. wind speeds, weather conditions, vegetation dryness conditions, etc.) across utilities promote the public safety, and if so, what criteria should be adopted?**

NCPA does not support the adoption of a single set of standardized wildfire risk criteria that would apply across all utility service territories. As PG&E notes, "each utility's service area is different and provides unique risks dependent on location topography, fuels, and fire spread analysis that therefore require separate interpretation and analysis to accurately quantify the risk. Further, no single factor or threshold governs the decision to de-energize."<sup>8</sup> This sentiment is shared by other parties, as well.<sup>9</sup> In addition, each utility's electrical system configuration is different and the actual condition and type of physical electrical infrastructure at issue will also be a factor.<sup>10</sup> Each of these unique characteristics should be considered in the decision-making process. While some parties have advocated for the IOUs to follow specific and standardized criteria, which they state would enable others to monitor wildfire risks and know with some

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certain geographic area within PG&E's system. Because of this, NCPA was directed to speak to 11 other operators in order to determine if one of its member utilities would be de-energized.

<sup>8</sup> PG&E Phase 2/Track 1 Opening Comments, September 17, 2019, p. 8.

<sup>9</sup> See, Phase 2/Track 1 proposals from SDG&E, p. 4; Public Advocates Office, p. 2; Southern California Edison, p. 5; San Francisco, p. 6; California Association of Small and Multi-Jurisdictional Utilities, p. 8.

<sup>10</sup> See presentation from PG&E Transmission PSPS Informational Webinar, p. 1, wherein PG&E notes that "some factors for a transmission-level impact include: severity and duration of weather; site-specific environmental conditions that increase wear; age and condition of the asset; status of recent repairs; real-time field observations."

certainty whether the utility was likely to de-energize a given line by tracking the standardized criteria, they also acknowledge the need for subjectivity in any given instance.<sup>11</sup> While it may be appropriate to have a common list of criteria that will be used by all the utilities, such a list should be used only to inform decision making and not as a “checklist” for when to de-energize. The use of any kind of “checklist” that takes the final decision out of the hands of the individuals that are on the ground monitoring the situation in real-time ignores the living nature of wildfire risk, and could never completely supplant the need for utility and fire personnel on the ground to make the final decision.

**D. Notification and Communication; What information should be communicated during a PSPS event as well as when power lines are being re-energized, and when (at what intervals) should that information be communicated?**

Several parties addressed the need for different levels of communications during PSPS events. As more fully discussed below, while NCPA believes that different notifications are warranted for Public Safety Partners, those notifications need to be defined in the context not only of whether there is a transmission level or distribution level PSPS, but the expected relative impact of the de-energization on customers and surrounding areas that would be impacted; namely, to what extent will a utility PSPS result in load reductions on lines not de-energized.

The current protocols properly require Public Safety Partners to be notified as soon as the IOUs begin considering de-energization (between 72 and 24 hours before an event),<sup>12</sup> even before it is required to make any formal CAISO or NERC notifications. NCPA agrees with a PG&E recommendation that there be specific notifications for transmission line de-energization (however that term is eventually defined for each IOU’s service territory). NCPA does not believe that the FERC standards of conduct related to sharing information with wholesale market participants preclude the IOUs from sharing this vital information with the affected utilities, but urges the Commission and the IOUs to work with FERC to seek clarification on this issue. NCPA also concurs with those parties that note the importance of the IOU’s coordination with CAISO, and that such coordination be part of the formal PSPS protocols. That coordination

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<sup>11</sup> See TURN, p. 5 (clear criteria/thresholds have to be met); CalCCA, p. 15 (a standard minimum set of criteria to be used).

<sup>12</sup> D.19-05-042, Appendix A, p. A-8.

should also include, as San Francisco notes,<sup>13</sup> the requirement that other participating transmission owners (PTOs) and generators be included in the notifications early in the process, which can be done through both PG&E communication channels and ISO's OMS System.

Several parties urged more formal notice requirements related to re-energization after a PSPS event. NCPA had direct communications with PG&E during the PSPS event that began on September 25, 2019, which were generally satisfactory.<sup>14</sup> NCPA was notified by PG&E and CAISO during their normal procedures. However, the re-energization process – while satisfactory – did not occur based on any formal protocols that defined the prioritization of the re-energization, and did not go as smoothly during the subsequent PSPS event. Regardless of the size of the PSPS, the processes and practices used for re-energization should be formally developed into protocols that can be followed in the future and must be coordinated with generation operations. Furthermore, those protocols must be developed by taking into account the relative impact of the de-energization event and the scope of continued harm to the de-energized entities and communities. There must be a written policy that clearly articulates how the IOUs are going to prioritize restoration that looks not only at the customers directly connected to their distribution system, but also considers impacts on customers of transmission-connected entities, like POUs, and generators that are also impacted by the PSPS. NCPA urges the Commission to retrospectively review all of the PSPS events and re-energization processes to help inform this process, and to include this critical issue within the scope of the upcoming workshops.

#### **E. PPS and Transmission Lines**

Since several NCPA member utilities are directly connected to PG&E's transmission lines, NCPA is greatly concerned about how a transmission-level PPS might impact these POUs and electric cooperatives. As SCE notes, impacts of transmission PPS event have greater potential for a reliability and public safety impact versus distribution.<sup>15</sup> Even if a POU or

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<sup>13</sup> San Francisco Phase 2/Track 1 Opening Comments, September 17, 2019, p. 8.

<sup>14</sup> NCPA does not address the specifics of those communications here, rather, to the extent warranted, NCPA may provide comments on the Post-PPS Event Report submitted by PG&E on October 10, 2019 that specifically address the specific factors relevant to that event.

<sup>15</sup> Southern California Edison Phase 2/Track 1 Opening Comments, September 17, 2019, p. 8.



electric cooperative is not de-energized directly, the shift in the flow of electricity across lines that remain energized can result in service disruptions for electricity customers outside of the “PSPS footprint.” As the City of San Jose notes, “Additionally, it should be noted that a transmission-level PSPS has the potential to cause distribution-level PSPS/de-energization impacts, even if de-energization does not initiate as a distribution-level PSPS event.”<sup>16</sup> There needs to be a clear understanding about the extent to which a transmission or distribution line de-energization can impact customers – including POUs and electric cooperatives – that are not directly de-energized by the IOU. This could also be the case if a PSPS event impacts multiple generators that are required to supply the resources for a non-de-energized area. NCPA recently experienced de-energized distribution lines that impacted reclaimed water flows necessary for injection into geothermal steam fields which in-turn had the potential to impact generation connected to the energized transmission grid.<sup>17</sup> NCPA urges the Commission to direct the utilities to perform assessments of their systems to gain a better understanding of the impacts of potential transmission-level PSPS events, not only on the customers that would be de-energized, but on the bulk electric system and overall reliability.

As San Francisco notes, de-energization of transmission lines could result in “rolling black-outs” or calls to curtail load that are the functional equivalent of a de-energization.<sup>18</sup> To get a better understanding of these events, SCE has suggested the Commission “proactively evaluate the loss of lines supporting large facilities and the corresponding impact(s) that a PSPS event would have on the public if this facility was interrupted.”<sup>19</sup> Similarly, San Francisco encourages studies and impact analyses of this type be done in advance, to better prepare for an actual PSPS event.<sup>20</sup> San Francisco also recommends that the Commission develop procedures for curtailment where de-energization leads to the loss of power but does not result in a shut-off of all power. As CalCCA note, the Commission should “encourage innovative approaches to grid management in cases where the affected IOU has an intertie with another provider who

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<sup>16</sup> City of San Jose Phase 2/Track 1 Opening Comments, September 17, 2019, p. 4.

<sup>17</sup> NCPA raises this issue here as an example of the potential impacts on non-de-energized customers and to stress the importance of coordination and planning for PSPS events, but reserves the right to address these issues in greater detail in comments on PG&E’s post-PSPS event reports.

<sup>18</sup> San Francisco Phase 2/Track 1 Opening Comments, September 17, 2019, p. 12.

<sup>19</sup> Southern California Edison Phase 2/Track 1 Opening Comments, September 17, 2019, p. 8.

<sup>20</sup> San Francisco Phase 2/Track 1 Opening Comments, September 17, 2019, pp. 8-9.

could provide an alternate route for power. Alternative interties may exist for areas subject to PSPS events and the Commission should direct IOUs to investigate options for providing power through alternative routes by other grid operators proactively.” The Commission should also consider the EPUC suggestion to evaluate whether the IOUs should conduct probabilistic modeling.<sup>21</sup> As SCE further observes, these assessments would provide a higher level of situational awareness and streamline the event decision-making process during the event

NCPA agrees that these kinds of studies and assessments are vitally important and should be performed. As SDG&E notes, “[a]ll preparations for a PSPS event should be geared toward customer impact by evaluating the number and type of customers to determine the appropriate response.”<sup>22</sup> This information is necessary to ensure that the utility has the all of the data it needs to make the necessary determination “that that the benefit of de-energization outweighed potential public safety risks.”<sup>23</sup> All of these suggestions should be thoroughly vetted in workshop discussions.

As noted above, CAISO plays a crucial role during a PSPS event. During a PSPS event, PG&E will coordinate with CAISO, and CAISO will follow its existing outage protocols to send notifications to impacted generators and load using their communication channels. However, CAISO processes should not replace the PG&E notice requirements already included in the PSPS protocols. CAISO’s OMS should not be the only channel of communication for PSPS events, rather, it should be utilized for PSPS events, just like it is for all outages, and PG&E’s responsibility to notify affected customers, public safety partners, and critical facilities is not altered or replaced by the existence of the ISO’s OMS.<sup>24</sup>

### **III. CONCLUSION**

Given the magnitude of potential impacts on communities across California, PSPS must be considered a measure of last resort, as the Commission has previously articulated. It is imperative that the Commission, the utilities, and affected stakeholders continue to fully assess these impacts and develop the tools needed to mitigate adverse consequences to the greatest

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<sup>21</sup> Energy Producers and Users Coalition Phase 2/Track 1 Opening Comments, September 17, 2019, p. 8.

<sup>22</sup> SDG&E Phase 2/Track 1 Opening Comments, September 17, 2019, p. 11.

<sup>23</sup> D.19-05-042, p. 108.

<sup>24</sup> See PG&E Response to DR\_NCPA\_001-Q11 (attached).

extent possible. Without question, Commission workshops on the Phase 2/Track 1 issues are necessary to ensure that such engagement occurs, and the Commission should coordinate closely with the utilities and the CAISO to ensure their participation. NCPA looks forward to discussing these issues during the upcoming workshop.

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Respectfully submitted,



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