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Leslie Lee Palmer
Director, Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
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Re: Northern California Power Agency Comments on PG&E Public Safety Power
Shutoff Report for October 9-12, 2019 PSPS Event

Dear Mr. Palmer:

The Northern California Power Agency (NCPA)¹ provides this response to PG&E's Public Safety Power Shutoff (PSPS) Report to the Commission for the PSPS event that began on October 9, 2019 and concluded on October 12, 2019, dated October 25, 2019 (October 9 Event Report). This response is timely filed pursuant to the extension authorized by Executive Director Stebbins on November 8, 2019.

NCPA is a not-for-profit Joint Powers Agency established in 1968 to make joint investments in energy resources that would ensure an affordable, reliable, and clean supply of electricity for customers in its member communities. NCPA's 16 members include municipalities, a rural electric cooperative, a port, public transit district, and a public utility district. NCPA also provides services for other publicly owned entities, including the purchase, aggregation, scheduling, and management of electrical energy. NCPA's members are both *public safety partners* and *critical facilities*, as defined in California Public Utilities Commission (Commission) Decision 19-05-042 (Phase 1 PSPS Decision).²

¹ 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.

² D.19-05-042, Appendix A; pp. A4, A6.

Events that occur on PG&E's transmission, as well as distribution, facilities directly impact NCPA and its members, many of which are smaller, publicly owned electric utilities (POUs). Some of NCPA's member utilities are transmission dependent upon PG&E facilities. In essence, these utilities are "customers" of PG&E, and in some instances, de-energizing certain PG&E power lines can result in the de-energization of the entire service territory of these smaller utilities.

NCPA understands that de-energization decisions are not made lightly. PSPS is rightly a measure of last resort due to the significant impacts that de-energization can have on utility customers. PG&E customers that have their power shut-off are not the only ones impacted, as customers of POU's are likewise affected, as are all California consumer within the "PSPS footprint" even if their power is never ultimately disconnected. Each specific PSPS event will entail unique circumstances and NCPA believes that it is essential for the Commission to thoroughly review each individual post-PSPS event report and the stakeholder comments directly responsive to those events. NCPA offers this feedback to the Commission and to PG&E in the interest of facilitating the development of PSPS protocols and procedures that can be implemented *and executed* in a manner that mitigates the adverse impacts of the PSPS event for all affected entities.

I. Impact of the October 9-12 PSPS Event Directly on NCPA

NCPA owns and operates Electric Power Generation, and provides a host of Power Management, Generator Dispatch and Legislative and Regulatory services to our 16 locally-owned electric utility members and our business partners (combined about 2 million meters in Northern California). Individually and collectively, we are dependent on PG&E transmission and distribution lines to transmit energy we generate, procure and consume. As noted above, this makes NCPA and its member utilities both public safety partners and owners/operators of critical facilities.

During the October 9 PSPS event, NCPA lost distribution and transmission-level service to its facilities, including services connected to generation resources. To provide context regarding the extent to which the PSPS event impacted NCPA, we offer the following details related to our facilities and our business partners:

NCPA Hydroelectric Operations – Calaveras County

1. Lost landline telephone and spotty cellular communications at our hydroelectric facilities near Murphys in Calaveras County.
2. Lost distribution level power at various NCPA Facilities in the Murphys area.
 - a. Lost Murphys Collierville Hydroelectric Generating Station 17-KV PG&E primary station service power. However, the Generators provided their own station service power and remained online.
 - b. 6 MW of renewable generation was lost during the PSPS. NCPA's New Spicer Meadows Powerhouse was forced offline since PG&E shut off

- the grid path.
- c. Lost PG&E power to McKay's Dam, while backup diesel generator picked up power.
 - d. Lost PG&E power to NCPA hydroelectric plant office in Murphys; backup propane generator provided power for priority systems.

NCPA Geothermal Operations – Sonoma/Lake County

1. A PG&E 21-kV distribution line outage near Middletown resulted in water pumping plant outages at NCPA injection well. NCPA Geothermal Plants remained online. NCPA estimates the Geothermal Plant has enough steam for seven days without the aforementioned pumping plants supplying water to injection wells.
2. Reports of the re-energization of a 21-kV line went to different NCPA staff whom were challenged in getting that information relayed to the appropriate party.
3. Calpine, another Middletown area Geothermal Plant Operator, declared a force majeure event and lost 75-MW of renewable generation.

Other Operations of Interest to NCPA

1. Placer County Water Agency (PCWA) owns several hydroelectric power plants in the Placer County Area along the Middle Fork of the American River. PG&E shut off a 60-kV line, resulting in the loss of 17 MW of renewable generation (French Meadows and Hellhole Units). Three other PCWA generators and their associated 230-kV PG&E line were already out of service due to scheduled maintenance.
2. NCPA dispatch staff lost visibility of the Lake Mendocino (Ukiah) stream flow gauge.
3. Media and website communications caused confusion and frustration due to misleading and/or information provided or no (lack of) information provided:
 - a. PG&E listed outages in Members' Communities even though they had power.
 - b. PG&E advertised they were going to de-energize transmission circuits, but would not identify which ones.
 - c. PG&E's website crashed.

II. NCPA Observations and Suggestions Stemming from October 9-12 PSPS Event

PG&E Failed to Provide Adequate Information in a Timely Manner.

NCPA and its member agencies are public safety partners and critical facilities, to which notification of pending de-energizations is critically important. Throughout the Commission's de-energization proceeding, NCPA has stressed the need for PG&E to provide notice to publicly owned utilities that are transmission customers of PG&E as soon as possible. PG&E is required to provide publicly owned utilities *priority notification*, yet throughout the PSPS event that began on October 9, PG&E repeatedly failed to provide critical information in a timely manner to their *transmission*-level customers for planning and preparedness. The moment PG&E begins

assessments of whether a transmission line is even *potentially* within the scope of a planned de-energization event, they are required to notify POUs. PG&E is aware of which lines could be impacted, and must improve their communications so that this information is passed along to affected entities sooner. This notice must be delivered directly to the designated contact for the impacted POU, and must include information regarding exactly what lines may be de-energized, not just the general geographic region.³

In order to effectively execute a PSPS event, as soon as PG&E knows of *any potential* effect on any transmission or distribution lines that affect any of NCPA members' loads and NCPA generation resources, PG&E needs to directly notify the NCPA dispatch control center and relay that information. Automated calls and information provided to the local law enforcement or fire authorities within the POU's service territory is not sufficient. The POUs – by and through NCPA – need to be notified directly so that any NCPA member utility and NCPA generation facility staff can use the NCPA dispatch control center as a single point of contact and receive the most current information that can be distributed. If this is not done, as noted below, NCPA dispatch center staff is forced to continually call the PG&E transmission and distribution control centers to get vital information and answers to questions from NCPA member utilities and staff that is necessary to effectively plan for and execute a de-energization event.

PG&E Must Better Coordinate Notification to Local POUs.

NCPA and PG&E did not wait until the first de-energization event to meet to discuss how communications would be addressed during a PSPS event. However, despite that pre-planning, PG&E still failed to execute its PSPS notification in an acceptable manner. During a PSPS coordination meeting between NCPA and PG&E on June 13, 2019, PG&E advised NCPA that PG&E's Grid Control Center will be the single point of contact for NCPA and NCPA Members during a potential or actual PSPS event. However, during the PSPS events of October 9 and 10, PG&E did not provide any direct notification to NCPA through the Grid Control Center. Instead, NCPA learned that PG&E planned to de-energize 12 to 20 transmission-level customers during a Cal OES update call. At that time, no other details were available, so NCPA did not know which lines or circuits, or which customers could potentially be impacted. Instead of receiving notification from PG&E, NCPA had to call PG&E's Grid Control Center to inquire which transmission level customers would be impacted. It was not until that time that NCPA learned that PG&E's Grid Control Center has twelve desks with a single operator that only has information regarding a discrete geographic area within PG&E's system. To get the necessary information, NCPA was directed to speak to eleven (11) other operators in order to determine if

³ Since the October 9-12 PSPS event, PG&E has provided notice of at least three additional de-energization or potential de-energization events, and affected NCPA member agencies have yet to receive the timely and accurate notice that is required by the existing rules. For example, as recently as November 17, while PG&E notified customers that there was the potential for a PSPS event, they failed to provide the City of Healdsburg Electric Utility with advance notice of the event, and even when the utility was later notified directly, that notification did not include any information about the actual lines that may be de-energized or whether load-shedding or curtailments could be utilized to mitigate the impact or scope of de-energization.

one of our members would be de-energized. This was completely unacceptable and not consistent with the Commission-adopted de-energization protocols that require priority notice for NCPA and its member agencies. In order to avoid this kind of confusion in obtaining critical information, PG&E must establish a single point of contact for all transmission-dependent POUs; for NCPA, for example, that contact must be someone that is knowledgeable and actionable regarding the transmission lines serving NCPA members and plants.

A key point of contact is also necessary during the restoration process. PG&E should employ the same communication protocols to address notices and information updates related to restoration and re-energization timelines and those described for the initial notices. That single point of contact would facilitate a smooth and effective restoration process. NCPA needs to have the most up-to-date, accurate, and relevant information about re-energization efforts, and be able to work directly with key PG&E personnel involved in the process to coordinate the re-energization of transmission and distribution lines and restoration of generation resources that may have been taken offline during the PSPS event.

The Information PG&E Provides to Affected Entities Must be Timely, Accurate, and Relevant

In the case of transmission-dependent POUs, it is not enough for PG&E to merely provide notification of the general scope of a potential outage; PG&E must identify the lines that could be impacted. Information regarding a potential PSPS event – especially one that impacts transmission level customers that are required to receive priority notification – must be timely *and* meaningful; during the October 9-12 PSPS event, it was neither. PG&E’s website – when operational – provided only high-level information regarding the impacted areas of the potential de-energization. At a minimum, PG&E should clearly state whether the de-energization will be at the transmission level or at the distribution level only, and list all the circuits which will or could be de-energized prior to the actual event. Just as PG&E needs to plan for its de-energization, POUs like those that operate in several NCPA member communities must be able to plan for potential de-energization within their entire service territory — including not only its utility operations, but also police, fire, and other critical public safety infrastructure.

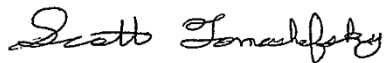
Furthermore, NCPA urges PG&E to provide information commensurate with knowledge-level of the entities impacted. NCPA understands that there are myriad circuits and lines interconnected all across PG&E’s service territory, and is also aware of these lines and circuits’ impact on the operations of its member agencies. PG&E should provide NCPA and similarly situated utilities with the level of information that is needed for them to conduct their own assessments of how best to deal with a potential de-energization. Doing so could allow NCPA member systems to shed load in some areas and avoid a complete shut-down. However, this kind of planning cannot be done by the POUs without the essential information that only PG&E is in a position to provide. Further, even after a PSPS event, PG&E should continue to work with affected entities on this type of planning. PG&E can be proactive, and these exercises can be done far in advance of the next fire-season and any PSPS event.

III. PG&E Must Proactively Plan for Mutual Aid

In the aftermath of a de-energization event, especially one as widespread as that which occurred on October 9, restoration must be prioritized. PG&E details its efforts to inspect and re-energize the power lines in Section 11, which is markedly devoid of calls for mutual assistance. NCPA appreciates that PG&E has moved off of the 3-5 day benchmark for restoration and noted that in adopting the new 48-hour benchmark, PG&E states that “If that requires mutual-assistance, the Company will ask for assistance earlier in the process and have outside crews staged before restoration begins.” NCPA urges PG&E to engage in a comprehensive plan to proactively plan for calling upon and utilizing mutual assistance.

Doing so would ensure that the human resources with the greatest knowledge of the impacted are available to assist when needed, and that the coordinating entities have a clear understanding and expectation of what is required. Part of this effort must include coordination between local resources (POU personnel) and PG&E. This means that PG&E has shared their expectations regarding the assistance that would be called upon *in advance of a PSPS* event, and the POU personnel would know *in advance* how they would be participating in the restoration efforts. This is important, as knowledge of the facilities and terrain in a specific impacted area could significantly impact the restoration efforts. It is also important for mutual aid to be coordinated in a manner that allows the deployment of mutual assistance such that the entity offering the aid can provide the greatest assistance without jeopardizing the ability to serve their own service territory if needed. This coordination may also require advanced training, which must be taken into consideration during the planning and preparation process.

Respectfully submitted,



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cc: Elizaveta Malashenko, Deputy Executive Director, Safety and Enforcement Policy
R.18-12-005 Service List