



SONOMA COUNTY CPUC PROCEEDINGS

Sonoma County has obtained party status in the following proceedings:

- Rulemaking 18-10-1007 (SB 901 – Wildfire Mitigation Plan)
- Rulemaking 18-12-005 (De-Energization)
- Rulemaking 17-05-010 (Rule 20A Undergrounding)
- Application 18-12-009 (PG&E 2020 General Rate Case)
- Rulemaking 19-01-006 (Financial Stress Test)
- Investigation 19-06-015 (2017 Sonoma County wildfires)
- Investigation 19-11-013 (2019 PSPS Events)
- Investigation 19-09-016 (PG&E’s Chapter 11 Bankruptcy)
- Rulemaking 19-09-009 (Microgrids and Resiliency Strategies)

R.18-12-005 - CPUC De-Energization Rulemaking

History of Utility De-energization

- Following devastating wildfires in 2007, San Diego Gas & Electric Company asked the CPUC for authority to proactively de-energize power lines during high-fire-threat conditions.
- In July 2018, following the 2017 wildfires, the CPUC extended the authority to de-energize power lines to all investor-owned utilities in California. The CPUC also imposed notification, mitigation, and reporting requirements for de-energization events on the utilities.
- Senate Bill 901 was adopted in in September 2018. SB 901 directed California’s investor-owned utilities to create Wildfire Mitigation Plans and submit them to the CPUC every year (AB 1054 extended the requirement to three years). The WMPs must contain protocols for de-energizing portions of the electrical system and procedures for notifying customers that may be impacted by de-energization.
- The CPUC opened R.18-12-005 to focus on de-energization. SB 901 required the CPUC to approve the utilities’ WMPs within 90 days of their submission, which did not allow enough time to examine the de-energization issue

De-Energization Rulemaking

- Phase 1 (December 2018–June 2019) focused on rules to improve utility notification, communication, and coordination with local governments, Access and Functional Needs (AFN) populations, and the general public
- The local government coalition made the following filings in Phase 1:
 - Comments on the Rulemaking:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M263/K645/263645370.PDF>
 - Opening Comments on the Phase 1 Scoping Ruling and Staff Proposal:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M274/K138/274138147.PDF>
 - Reply Comments on the Phase 1 Scoping Ruling and Staff Proposal:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M279/K246/279246536.PDF>
 - Opening Comments on the Proposed Decision Adopting Phase 1 Guidelines:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M290/K365/290365362.PDF>
 - Reply Comments on the Proposed Decision Adopting Phase 1 Guidelines:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M292/K711/292711567.PDF>
- The CPUC adopted virtually all of the local government coalition’s recommendations for Phase 1, including:
 - Requiring PG&E to partner with local governments and first responders to ensure effective notice and improve communication;
 - Requiring PG&E to work with local governments to improve the utility’s medical baseline registry and to develop ways to improve outreach to AFN populations;
 - Requiring PG&E to leverage existing communication and notification systems (e.g., Nixle, Reverse 911, etc.) instead of developing its own duplicative systems;
 - Requiring PG&E to use the SEMS model for communication with public safety partners, and to update local government contact information annually;

- Requiring PG&E to establish a 24-hour information hotline that will remain active until power is restored;
 - Requiring better outreach and education for tenants of master-metered properties, such as mobile home parks;
 - Requiring PG&E to share its internal situational awareness information (e.g., weather and fire modeling data and metrics) with local governments and first responders;
 - Requiring PG&E to establish a web-based information portal that will provide situational awareness information, outage maps, affected customer information, and other relevant information to public safety partners;
 - Requiring PG&E to establish a direct line of communication for local governments and first responders to its EOC during PSPS events, including the requirement to embed a local liaison in PG&E's EOC at the government's request, and vice versa;
 - Requiring PG&E to participate in increased table-top exercises with local public safety partners, and to continue readiness preparations throughout the year;
 - Requiring PG&E to give local governments and first responders the opportunity to submit comments to the CPUC on the utility's PSPS after-action reports;
 - Ensuring that PSPS communications and educational material is provided in California's threshold languages.
- The Phase 1 Decision (D.19-05-042) is available here:
<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M296/K598/296598822.PDF>
 - Phase 2 opened on August 14, 2019. Phase 2 was originally planned to have two tracks, both of which would refine the requirements adopted in Phase 1 and would take a deeper dive into AFN customer issues and utility-provided mitigation measures.
 - The local government coalition submitted opening and reply filings on the Phase 2, Track 1 issues;
 - Track 1 Proposals:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M313/K814/313814089.PDF>

- Responses to Track 1 Proposals and Comments:
 - <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M317/K610/317610533.PDF>
- The local government coalition's Response to the Track 1 Proposals was filed after PG&E's October 9, 2019 PSPS event, and provided significant criticism of PG&E's handling of the event
 - The coalition's filing, characterized by the press as a "blistering critique," became the subject of a *San Francisco Chronicle* article, which appeared online and then on the front page of the printed newspaper the following day:
 - Online: *'Like Battling the Hydra': Counties say PG&E failed them in outages*, S.F. Chronicle, J.D. Morris, October 17, 2019
 - Other publications wrote articles based on the coalition's filing or picked up the *Chronicle* story:
 - *PG&E power shutdown slammed by local governments*, The Press Democrat, Will Schmitt, October 17, 2019
 - *PG&E CEO Says It Could Impose Blackouts in California for a Decade*, The Wall Street Journal, Katherine Blunt, October 18, 2019
 - *PG&E resists calls to change shutoffs despite widespread frustration*, Politico, Colby Bermel, October 16, 2019
- The CPUC took notice of the local government coalition's filings, as well, because they catalogued PG&E's longstanding failures to communicate, coordinate, and partner with local governments and AFN individuals
 - Following the October 9 PSPS event, CPUC President Marybel Batjer issued a letter to PG&E detailing its failings and calling an emergency meeting during which PG&E's upper management and Board would have to account for the utility's performance:
 - https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2019/PGE%20Letter%20-%20PSPS%2010-14-19.pdf
 - During the emergency meeting, the Commissioners' comments and questioning from the dais made it clear that they had read the local governments' filings
- In response to PG&E's presentations at the emergency meeting and PG&E's response to President Batjer's letter, the local government coalition submitted a

letter detailing our concerns with PG&E's alleged "improvements." The CPUC posted this letter to its PSPS webpage:

[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2019/Joint%20Local%20Governments%20Letter%20to%20the%20CPUC%20re.%20PG%20E's%20October%2018%20PSPS%20Presentations%20\(X212444\).pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2019/Joint%20Local%20Governments%20Letter%20to%20the%20CPUC%20re.%20PG%20E's%20October%2018%20PSPS%20Presentations%20(X212444).pdf)

- After PG&E, on its own motion, determined that it had completed the PSPS improvement activities and reporting ordered by President Batjer after the October 9 PSPS events, President Batjer issued a ruling chastising PG&E for making that decision on its own, and finding that PG&E had failed to comply with the CPUC's previous directives for PSPS improvements. President Batjer ordered PG&E to submit bi-weekly progress reports on PSPS improvements until such time as the CPUC is satisfied. The Ruling also ordered additional wildfire season preparation requirements, including:
 - Enhanced outreach to vulnerable populations;
 - Improved communication with local governments;
 - Establishing working groups with local governments to address the needs of local governments before, during, and after PSPS events and to provide feedback on PG&E's 2020 PSPS protocols.
 - Many of the additional activities President Batjer mandated are things that our coalition has requested in our PSPS filings
 - The January 30, 2020 ruling is available here: <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M326/K172/326172052.PDF>

- Following the large number of PSPS events in October 2019, the CPUC stayed the schedule for Phase 2 of the de-energization rulemaking due to the urgent need to reassess the existing PSPS protocols and how the utilities have implemented them
 - The October 28 press release announcing additional actions to hold utilities accountable is available here: <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M318/K885/318885370.PDF>

- The CPUC reinstated Phase 2 of the rulemaking to revamp the PSPS protocols and issued proposed revised protocols on January 30, 2020: <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M325/K985/325985221.PDF>
 - The proposed protocols mandate significant coordination with local governments, including:
 - Monthly regional planning meetings;
 - De-energization exercises;

- Development of notification protocols for circumstances where communications infrastructure is not functioning;
 - Siting of Community Resource Centers (CRC) in coordination with local governments;
 - 24-hour CRCs
 - Improved planning for major transportation corridors; and
 - Improved outreach and resources for AFN populations.
- Many of the proposed protocols require the level of coordination with local governments that our coalition has been advocating for.
 - It is clear that CPUC staff and decisionmakers continue to read our coalition's filings closely and take our input seriously.
 - The local government coalition filed opening comments on the revised protocols on February 19, 2020:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M328/K686/328686334.PDF>
 - The local government coalition filed reply comments on February 26, 2020:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M328/K686/328686372.PDF>

R.18-12-005 - PG&E Order to Show Cause

- On November 12, 2019, the CPUC issued an Order to Show Cause why PG&E should not be sanctioned for violating the CPUC's rules relating to de-energization and safe utility service:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M319/K530/319530378.PDF>
 - The OSC is defined narrowly to focus on specific failures by PG&E to provide accurate information and notification to local governments and the public during the October 2019 PSPS events:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M322/K703/322703988.PDF>
 - PG&E served its testimony attempting to justify its actions during the October 2019 PSPS events on February 5, 2020:
<http://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R1812005/2468/326482671.pdf>
 - The local government coalition served its direct testimony addressing the impacts of PG&E's inaccurate outage maps and event information, and

unavailable website, on February 28, 2020:

<http://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R1812005/2528/328393658.pdf>

- All parties will serve rebuttal testimony on March 16, 2020
- The non-utility parties will address the potential financial penalties to which PG&E should be subject in their post-evidentiary hearing briefs

Investigation 19-11-013 - 2019 PSPS Events

- On November 13, 2019, the CPUC opened a formal Investigation (I.19-11-013) into the late 2019 PSPS events conducted by all three large utilities:
<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M319/K821/319821875.PDF>
 - One of the issues the Investigation will examine is how the utilities communicated and coordinated with local governments, how effective that communication and coordination was, and the impacts of ineffective notification and communication
 - The utilities served their responses to the OII on December 13, 2019. PG&E's response is available here:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M323/K689/323689304.PDF>
 - The local government coalition served its response to the OII, and to PG&E's response, on January 10, 2020:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M324/K940/324940633.PDF>
 - At approximately 90 pages, the local government coalition's filing was by far the most comprehensive examination of PG&E's failings before, during, and after the 2019 PSPS events
- The local government coalition's primary purpose in Phase 1 of the Investigation will be to provide the CPUC and SED with as much information as possible about the utilities' execution of the PSPS events and the resulting on-the-ground impacts. The local governments are the CPUC's best source of information on how the PSPS events are *really* going, and the CPUC is very interested in everything we have to say.
- Depending on the outcome of the SED report, which will likely find that PG&E, at a minimum, utterly failed to act in a rational manner during the 2019 outages,

the local government coalition may have the opportunity to advocate for financial penalties or other remedial measures

Additional PSPS-Related Activities

- The actions the CPUC has taken in response to PG&E's October 2019 de-energizations are due in no small part to the local government coalition's participation at the CPUC
- In addition to participation in the formal CPUC docket for de-energization, The local government coalition has submitted responses to PG&E's after-action reports for each de-energization in 2019, all of which are part of the record in R.18-12-005 and I.19-11-013
- Certain of the Commissioners have agreed to meet with the local government coalition's elected officials to discuss going-forward improvements to PG&E's PSPS practices, within the scope of the quasi-legislative track of R.18-12-005.

PSPS Legislation

- At the invitation of Senator Dodd's office, the local government coalition has provided input on draft language relating to PSPS improvements. Senate Bill 862, in particular, which expands the utilities' obligations to plan and provide resources for AFN populations, and which includes PSPS events in the definition of events covered by the Emergency Services Act, has been informed significantly by our coalition's input.
- The Rural County Representatives of California have also sought our coalition's input on legislative language relating to PSPS events.

Request from CPUC to Participate in Disaster Relief Proceeding

- In March 2018, the CPUC opened Rulemaking 18-03-011 to generally examine the need for a statewide customer disaster relief program. This proceeding predates the CPUC's expansion of PSPS authority to PG&E and SCE, and also predates PG&E's PSPS events.
- The Rulemaking is now in Phase 2, which is focusing heavily on resiliency for communications providers during PSPS events and wildfires.
- On March 6, 2020, President Batjer issued an Assigned Commissioner's Ruling and Proposal for maintaining a resilient and dependable communications

network during catastrophes:

<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M328/K685/328685793.PDF>

- A number of CPUC staff have reached out to our coalition members and to our coalition's legal counsel asking for our participation and input on the proposal. We have been told that this request is specifically based on the work our coalition has done in the PSPS rulemaking and associated proceedings.
- Other non-utility parties have also reached out and encouraged our coalition's participation.
- There are several options for participation, ranging from submitting letters to full participation, that our coalition members are considering

Rulemaking 19-09-009 - Microgrids

- The CPUC opened Rulemaking 19-09-009 in September 2019 to explore ways to optimize the existing resiliency programs, revamp the utilities' interconnection tariffs, and provide near-term mitigation for PSPS events
- The CPUC held a workshop on local resiliency issues in December 2019
 - CPUC staff organizing the workshop reached out to invite representatives from our coalition to present the local government perspective
 - Supervisor Gorin and Supervisor Hopkins presented on behalf of Sonoma County and our coalition
- Following the workshop, CPUC Energy Division staff reached out to the local government coalition to ask what type of information from the utilities would facilitate local resiliency planning, and what type of meeting structure would best facilitate that information-sharing and planning. Based on our input, the CPUC issued a Staff Proposal containing our requests:

<http://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=324963031>

 - Local government outreach and communication
 - Utilities required to ensure effective communication and ongoing working relationships with local governments
 - Utilities required to provide local governments information about configuration of local distribution and transmission network, as well as the utility's planned infrastructure upgrade projects

- Utilities required to hold semi-annual workshops with local governments. Utilities must send experts capable of answering technical questions. Utilities must provide information on past PSPS events, weather and climatology predictions for future PSPS events, case studies of outage scenarios.
 - Workshops will be moderated by county OES, not the utility
 - Workshops will be monitored and supported by CPUC staff
- Utilities will develop a resiliency project engagement guide to make the process of developing microgrids less opaque
- Utilities will create a dedicated team for local government projects, to help with advance planning information, prioritizing projects to maximize resources, providing consultation of types of projects, and providing information about load profiles, maps, etc.
- Utilities will create a guide for developers to aid in competitive bidding
- Utilities will create a separate web portal for local governments to allow sharing of project-related information, circuit maps, PSPS information, etc.
- The local government coalition obtained party status and filed reply comments on the CPUC staff proposal, as well as PG&E's microgrid proposal, on February 6, 2020:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M327/K740/327740791.PDF>
- PG&E's proposal:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M324/K944/324944715.PDF>
- Sonoma County participated in a February 28, 2020 meeting hosted by Sonoma Clean Power and attended by a wide variety of stakeholders, including the City of Santa Rosa, the state and local Air Resources Board, water districts, RCRC, the City of Healdsburg, and a number of other agencies. The discussion was extremely productive and a number of action-items were identified for near- and longer-term collaboration

R.18-10-007 - Wildfire Mitigation Plan Rulemaking

- The CPUC opened Rulemaking 18-10-007 in October 2018 pursuant to the requirements of Senate Bill 901, which required the electric utilities to create and submit to the CPUC Wildfire Mitigation Plans (WMPs)
- The local government coalition submitted comments on PG&E's WMP on March 13, 2019:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M272/K339/272339605.PDF>
- On April 29, 2019, the CPUC issued a Proposed Decision approving PG&E's WMP and adopting several of the local government coalition's recommendations.
- The coalition filed opening comments on the Proposed Decision on May 20, 2019:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M290/K872/290872460.PDF>
- The coalition filed reply comments on the Proposed Decision on May 28, 2019 [link to e-filed version not available on CPUC docket]
- The final CPUC decision on PG&E's WMP adopted the following recommendations from the local government coalition:
 - PG&E should address its workforce shortage by partnering with local departments of public works, where possible, to take advantage of skilled labor;
 - PG&E should consider whether a community has ingress/egress constraints when undertaking system hardening activities (i.e., should power lines be underground);
 - PG&E must provide local governments access to its internal weather and fire risk data and modeling ("situational awareness" information) in real time via a secure web portal;
 - Future WMPs must address how PG&E provided situational awareness information to local governments, how effective that coordination was, and what improvements PG&E will make going forward;
 - PG&E must provide local governments with direct communication from its Wildfire Safety Operations Center;

- PG&E must coordinate closely with local governments in order to improve its emergency preparedness and outreach, and develop a successful wildfire mitigation program; and
- Future PG&E WMPs must provide robust analysis of how its past Fire Prevention Plans or past experience under the FPPs informed the current WMP.
- On February 6, 2020, the utilities submitted their 2020 WMPs.
- Comments are due on April 7, 2020

Rulemaking 17-05-010 - Rule 20 Undergrounding of Electric Lines

- The CPUC opened Rulemaking 17-05-010 in May 2017 to examine ways in which to revamp or optimize the longstanding Rule 20 undergrounding program.
- The Rulemaking proceeded at a slow pace after its inception
- The local government coalition joined the proceeding in early 2019 and filed comments on the new Scoping Ruling that asked for input on ways to improve credit allocations, criteria for eligibility, and whether fire risk should be included in the undergrounding program analysis:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M258/K310/258310682.PDF>
- The CPUC held a two-day workshop on the current program and potential revisions to the rules in April 2019.
 - Johannes Hoeverstz, Sonoma County’s Director of the Department of Transportation and Public Works, was invited by the CPUC to participate in two of the workshop panels. Mr. Hoeverstz participated in both panels.
- On February 13, 2020, the CPUC issued a Staff Proposal for improving the Rule 20 undergrounding program:
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M327/K199/327199859.PDF>
- The local government coalition will submit comments on the Staff Proposal on March 31, 2020