

November 5, 2019
Regular Meeting
Item # 7a

CalTrout

Additional Documents:
PowerPoint Presentation

June Mountain Fuels Reduction and Keystone System Restoration Project



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The June Lakes area is a popular Mono County destination

	Total Visitor	Season			
		Winter	Spring	Summer	Fall
Base:	1032	224	268	213	327
Mono Lake	43.2%	30.8%	54.6%	40.3%	40.1%
Mammoth Lakes Town	36.4%	44.7%	22.4%	39.8%	44.6%
June Lakes area	27.9%	26.4%	22.5%	22.2%	39.1%



Lauren Schlan Consulting, 2019 (Draft)

Many tourists visit to fish, hike, & ski

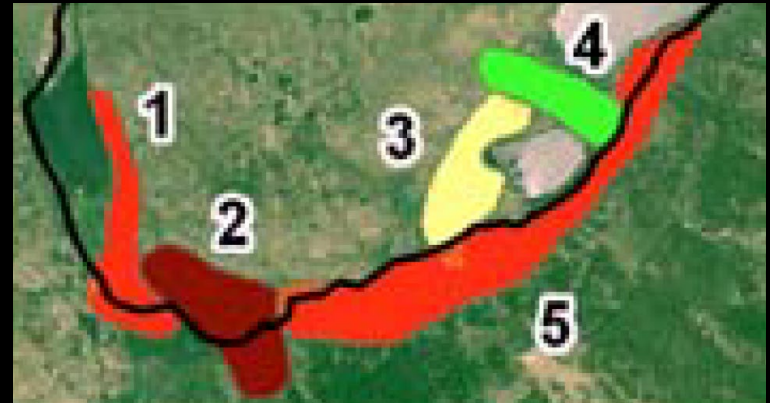
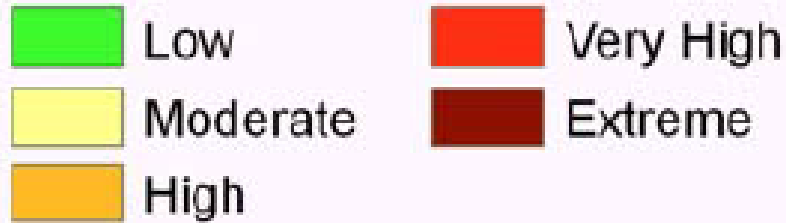
	Total Visitor	Season			
		Winter	Spring	Summer	Fall
Base: Outdoor activities	553	155	123	139	136
Fishing	27.8%	2.5%	40.3%	34.1%	28.8%
Hiking	25.7%	4.1%	18.3%	44.1%	30.7%
Alpine Skiing - downhill	11.9%	48.5%	6.2%	0.0%	0.0%

Lauren Schlan Consulting, 2019 (Draft)



Wildfire threatens the region's scenic integrity

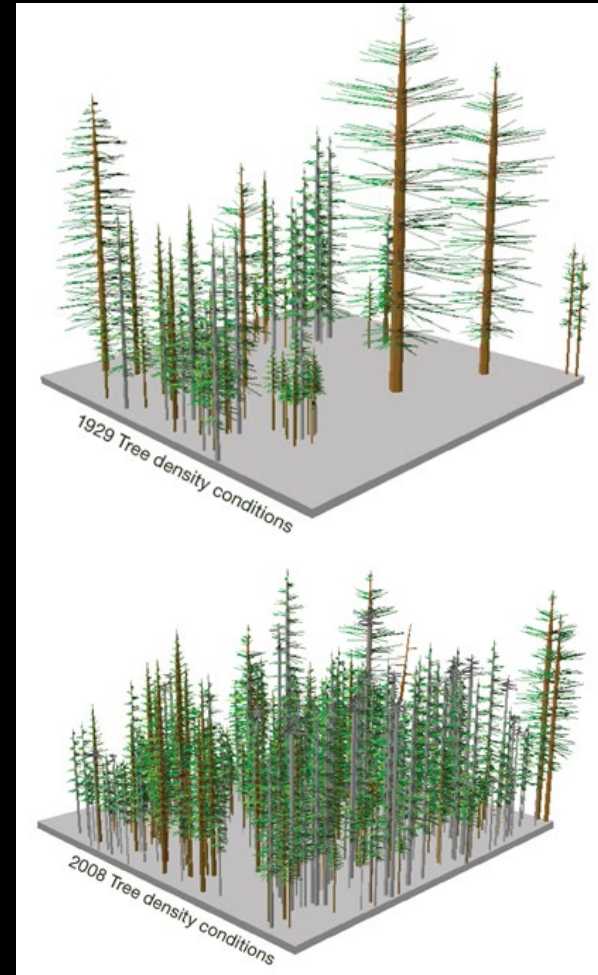
Community Hazard Rating



MONO COUNTY, CALIFORNIA

Community Wildfire Protection Plan

> 70 yrs Fire Suppression = \uparrow Fuel



*Climate
Variability
=
↑ Fuel*



Beetle Kill = ↑↑↑ Fuel

What's With All the Dead Trees?

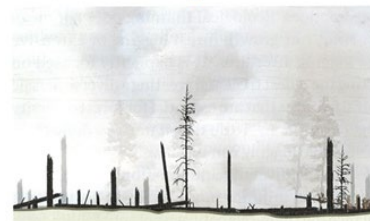
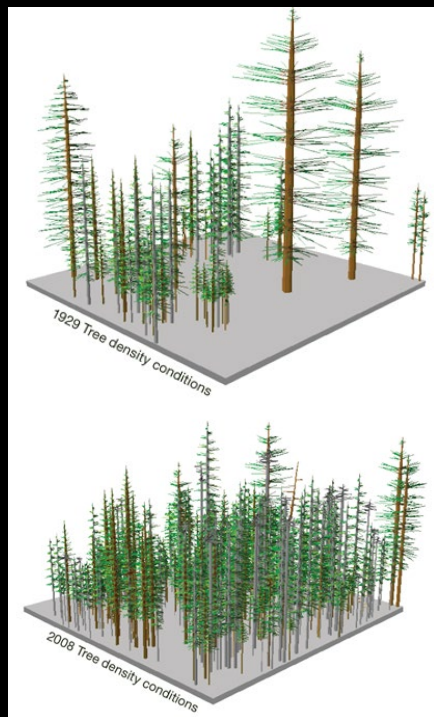
Mountain pine beetle outbreak on the Inyo National Forest 2005-2013.



- Widespread tree mortality in INF subalpine forests
- Native mountain pine beetle
 - Outbreaks occur during drought
 - Night-time low temps rising?
- 2005-current
- June Mtn Whitebark Pine hardest hit
 - Up to 95% of overstory killed

Restoration

Fire-surrogate thinning



FIRE-SUPPRESSED FOREST



ECOLOGICALLY MANAGED FOREST

June Mountain Fuels Reduction and Keystone System Restoration Project

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Goals: *Simultaneously restore key habitats and reduce the risk of catastrophic wildfire to the June Lake area*

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Objectives: *Use a multi-phased approach to treat 503 ac of pine forest, 24 ac of meadows, & 20 ac of aspen groves*

June Mountain Fuels Reduction and Keystone System Restoration Project



Goals: Simultaneously restore key habitats and reduce the risk of catastrophic wildfire to the June Lake area

Objectives: Use a multi-phased approach to treat 503 ac of pine forest, 24 ac of meadows, & 20 ac of aspen groves

Results:

- 2018: 75 ac WB pine forest (**completed**)
- 2019: 38 ac WB pine forest (**completed**)
- 2020-2022: 168 ac WB/LP pine forest, 24 ac aspen groves, 20 ac meadows (**pending**)
- 2023-2025: 222 ac WB/LP pine forest (**apply in 2022**)

Phase I treatment effects



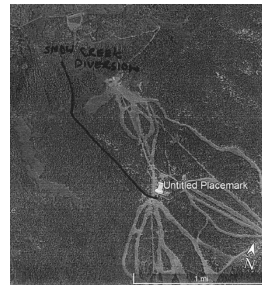
Infrastructure Benefits

Winter Recreation



Infrastructure Benefits

Winter Recreation, Water Supply



Infrastructure Benefits

Winter Recreation, Water Supply, Public Safety

Project Area



Tops of Chairs J4 & J6

Major 3rd Party Communication Facilities

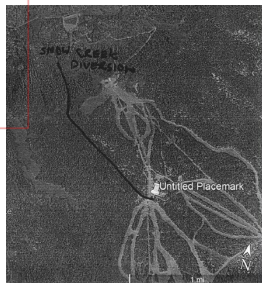


Mono Lake
June Lake

Bottom of Chair J7

June Lake PUD Water Diversion

Whitebark Pine Mortality



Mono County Public Safety repeaters -- Input tone list

Repeater Sites

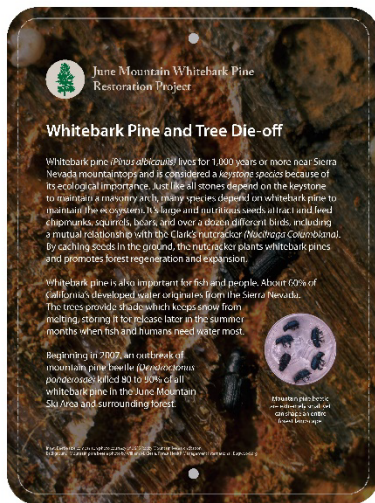
- These repeater-sites are listed in north-to-south order.

Leviathan	(adjacent to CA 89 at the Mono/Alpine County line)
Larson Lane Fire Station	(northern end of Antelope Valley near Coleville) (County Fire only)
Sweetwater	(east of the CA 108/US 395 junction - 4WD access)
Potato Peak	(highest peak visible to the east from Bridgeport)(Mono Sheriff's Department only)
Conway Summit	(just east of the summit between Bridgeport and Lee Vining - this is the hub site for the county's electronic sites)
Lee Vining Canyon	(the hill south of the Mobil Gas Station)
Benton	(on Antelope Mtn. NW of Benton)
June Mountain	(at the top station of June Mountain Ski Area Chair J7)
Substation Hill	(AKA "substation" or sometimes "Mammoth") (located east of the US 395/CA 203 junction)
Mammoth Fire Station 1	(Main Street just west of Old Mammoth Road) (County Fire only)
Casa Diablo Mtn.	(due east of the Crowley Lake dam)
Long Valley Fire Station	(in the community of Crowley Lake) (County Fire only)
Sherwin summit	(NE of US 395 at the top of the Sherwin Grade) (County Fire only)

Repeater Input Tones

Frequency	Input	License	Type	Tone Out	Tone In	Alpha Tag	Description	Mode	Tag
154.8000	155.7000	NWK887	RM	146.2	146.2	MCSOLevRpt	Mono Sheriff Leviathan Rptr	FN	Law Dispatch
154.8000	155.7000	NWK887	RM	141.3	141.3	MCSOSwRpt	Mono Sheriff Sweetwater Rptr	FN	Law Dispatch
154.8000	155.7000	NWK887	RM	177.3	177.3	MCSOPotRpt	Mono Sheriff Potato Peak Rptr	FN	Law Dispatch
154.8000	155.7000	NWK887	RM	136.5	136.5	MCSOConRpt	Mono Sheriff Conway Summit Rptr	FN	Law Dispatch
154.8000	155.7000	NWK887	RM	103.5	103.5	MCSOLeeRpt	Mono Sheriff Lee Vining Canyon Rptr	FN	Law Dispatch
154.8000	155.7000	NWK887	RM	114.8	114.8	MCSOBenRpt	Mono Sheriff Benton Rptr	FN	Law Dispatch
154.8000	155.7000	NWK887	RM	123.0	123.0	MCSOJunRpt	Mono Sheriff June Mtn Rptr	FN	Law Dispatch
154.8000	155.7000	NWK887	RM	151.4	151.4	MCSOSubRpt	Mono Sheriff Substation Hill Rptr	FN	Law Dispatch
154.8000	155.7000	NWK887	RM	131.8	131.8	MCSOCasRpt	Mono Sheriff Casa Diablo Mtn Rptr	FN	Law Dispatch
153.8600	155.7600	WPNT303	RM	146.2	146.2	MCFDLevRpt	Mono Fire/EMS Leviathan Rptr	FN	Fire Dispatch
153.8600	155.7600	WPNT303	RM	100.0	100.0	MCFDLarRpt	Mono Fire/EMS Larson Lane Rptr	FN	Fire Dispatch
153.8600	155.7600	WPNT303	RM	141.3	141.3	MCFDSwRpt	Mono Fire/EMS Sweetwater Rptr	FN	Fire Dispatch
154.8000	155.7000	NWK887	RM	136.5	136.5	MCSOConRpt	Mono Sheriff Conway Summit Rptr	FN	Law Dispatch
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153.8600	155.7600	WPNT303	RM	110.9	110.9	MCFDLevRpt	Mono Fire/EMS Lee Vining Canyon Rptr	FN	Fire Dispatch
153.8600	155.7600	WPNT303	RM	114.8	114.8	MCFDBenRpt	Mono Fire/EMS Benton Rptr	FN	Fire Dispatch
153.8600	155.7600	WPNT303	RM	127.3	127.3	MCFDJunRpt	Mono Fire/EMS June Mtn Rptr	FN	Fire Dispatch

Outreach



June Mountain Whitebark Pine Restoration Project

Whitebark Pine and Tree Die-off

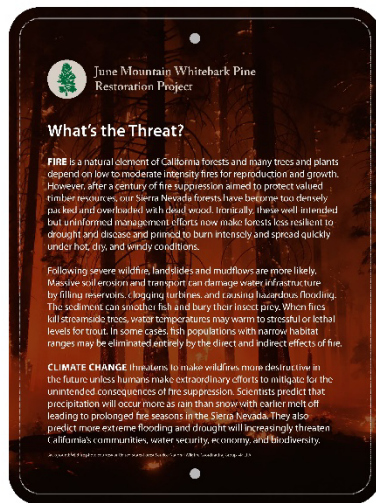
Whitebark pine (*Pinus albicarpa*) lives for 1,000 years or more near Sierra Nevada mountaintops and is considered a keystone species because of its ecological importance. And like all species, it depends on the keystone to maintain a healthy niche. Many species depend on whitebark pine to maintain the ecosystem. Its large and nutritious seeds attract and feed chipmunks, squirrels, bears and over a dozen different birds, including a mutual relationship with the Clark nutcracker (see the Clark Nutcracker), by caching seeds. In the ground, the nutcracker plants whitebark pines and promotes forest regeneration and expansion.

Whitebark pines are also important for fish and people. About 60% of California's developed water originates from the Sierra Nevada. The trees provide shade which keeps snow from melting, storing it for release later in the summer months when fish and humans need water most.

Beginning in 2007, an outbreak of mountain pine beetle (*Pissodes* spp.) infestations killed 80 to 90% of all whitebark pines in the June Mountain Ski Area and surrounding forest.

Mountain pine beetle
the most destructive pest of conifers in a wide range of habitats

June Mountain Whitebark Pine Restoration Project is a project of the Sierra Nevada Foundation. For more information, visit www.sierranvada.org.



June Mountain Whitebark Pine Restoration Project

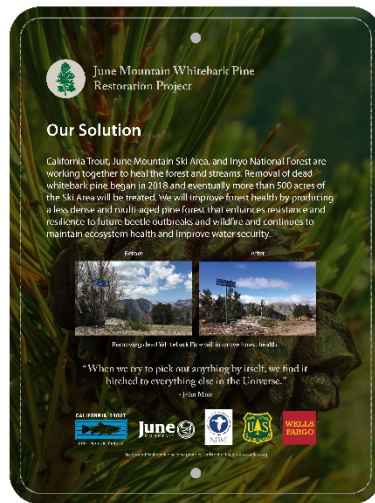
What's the Threat?

FIRE is a natural element of California forests and many trees and plants depend on low to moderate intensity fires for reproduction and growth. However, after a century of fire suppression aimed to protect valued timber resources, our Sierra Nevada forests have become too densely packed and overwhelmed with dead wood. Ironically, these well-intended but uninformed management efforts now make forests less resilient to drought and disease and primed to burn intensely and spread quickly under hot, dry, and windy conditions.

Following severe wildfires, landslides and mudflows are more likely. Massive soil erosion and transport can damage sewer infrastructure by filling reservoirs, clogging gutlines, and causing hazardous flooding. The sediment can smother fish and bury their insect prey. When fires kill streamside trees, water temperatures may warm to stressful or lethal levels for trout. In some cases, fish populations with narrow habitat ranges may be eliminated entirely by the direct and indirect effects of fire.

CLIMATE CHANGE threatens to make wildfires more destructive in the future unless humans make extraordinary efforts to mitigate for the unintended consequences of the suppression. Scientists predict that precipitation will occur more as rain than snow with earlier melt off leading to prolonged fire seasons in the Sierra Nevada. They also predict more extreme flooding and drought will increasingly threaten California communities, water security, economy, and biodiversity.

June Mountain Whitebark Pine Restoration Project is a project of the Sierra Nevada Foundation. For more information, visit www.sierranvada.org.




June Mountain Whitebark Pine Restoration Project

Our Solution

California Trout, June Mountain Ski Area, and Inyo National Forest are working together to heal the forest and streams. Removal of dead whitebark pine began in 2018 and eventually more than 500 acres of the Ski Area will be treated. We will improve forest health by practicing a less dense and multi-aged pine forest that enhances resiliency and resilience to future beetle outbreaks and wildfire and continues to maintain ecosystem health and improve water security.

Before **After**



Removing the dead whitebark pine will increase water quality.

"When we try to pick out anything by itself, we find it hitched to everything else in the Universe."
-John Muir

California Trout **June** **Inyo National Forest** **USA** **Wildlife Refuge**

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June Mountain Whitebark Pine Restoration Project

Impact: Wildlife, Fish, Water, and People

Reducing insect attack and wildlife fuel in the region will benefit the June Lake community, recreation opportunities, fish, wildlife, and downstream water users. Given the anticipated impacts of climate change and increasing water demands by a growing human population, projects like the June Mountain Whitebark Pine Restoration Project are critical for the continued coexistence of wildlife, fish, and people.

What can you do?

Supporting organizations that are working to protect and restore places like June Mountain and other natural treasures is vital to responsible environmental stewardship. At California Trout, we work on conservation and restoration projects here and throughout the state. With your support and efforts to spread the word about the importance of maintaining healthy watersheds, we can ensure water security and resilient wild fish in healthy streams for a better California.

Donate or learn more at

CalTrout.org/JuneMountain



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Outreach

SAVE THE TREES! Local agencies are pushing to restore pine populations in June Mountain

On September 22, the two largest fire districts in the region, the Truckee Meadows Fire District and the Reno Fire District, announced a joint effort to restore pine populations in the June Mountain area. The two agencies are working together to fund a project that will restore the pine forests in the area. The project will include planting native pine trees and installing firebreaks to protect the remaining trees. The project is being funded by a grant from the Nevada Department of Forestry and the Nevada Department of Conservation.

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RESTORATION JUNE TO RESTORE WHITEBARK PINE GROVE

Restoration efforts are well underway in the June Mountain area. The project is being funded by a grant from the Nevada Department of Forestry and the Nevada Department of Conservation. The project will include planting native pine trees and installing firebreaks to protect the remaining trees. The project is being funded by a grant from the Nevada Department of Forestry and the Nevada Department of Conservation.

GREEN BUSINESS BECOME ONE.

SAVE MONEY. BE A GREEN LEADER. INCREASE BUSINESS.

Do a year for the Eastern Sierra Business community that is conserving California's valuable resources and protecting the environment.

FOR MORE INFORMATION:
760-937-1830 | greenbusinessca.org
greenbusiness@earthlink.net

June Mountain Whitebark Pine Restoration Project

Whitebark Pine and Tree Die-off

Whitebark pine (*Pinus albicarpa*) lives for 1,000 years or more near Sierra Nevada mountains and is considered a keystone species because of its ecological importance. Until the 1980s, most of the whitebark pine in the Sierra Nevada was found in the June Mountain area. The project is being funded by a grant from the Nevada Department of Forestry and the Nevada Department of Conservation.

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June Mountain Whitebark Pine Restoration Project

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California Trout | June Mountain Ski Area | Inyo National Forest

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Following severe wildfire, landscapes and rangelands are more likely to experience soil erosion and transport of sediment into streams, leading to filling reservoirs, clogging lifelines, and causing hazardous flooding. The sediment can smother fish and bury their insect prey. When fires kill streamside trees, water temperatures may warm to stressful or lethal levels for trout. In some cases, fish populations with narrow habitat ranges may be eliminated entirely by the direct and indirect effects of fire.

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June Mountain Whitebark Pine Restoration Project

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Outreach

SAVE THE TREES!

Local agencies are pushing to restore pine populations in June Mountain

On September 22, the two agencies that are leading the effort to restore pine populations in June Mountain are releasing a joint report on the progress of the project. The report, titled "June Mountain Whitebark Pine Restoration Project: A Progress Report," was prepared by the California Department of Forestry and Fire Protection (CAL FIRE) and the Inyo National Forest. The report details the progress of the project, which is aimed at restoring the whitebark pine population in the June Mountain area. The whitebark pine is a rare and endangered species that is found only in the Sierra Nevada mountains. It is a long-lived tree that can live for up to 1,000 years. The whitebark pine is a keystone species because of its ecological importance. It is a food source for many animals, including squirrels, bears, and birds. It is also a source of timber and resin. The whitebark pine is a keystone species because of its ecological importance. It is a food source for many animals, including squirrels, bears, and birds. It is also a source of timber and resin.

LOCAL NEWS

June Mountain Whitebark Pine Restoration Project

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June Mountain Whitebark Pine Restoration Project

RESTORATION

JUNE TO RESTORE WHITEBARK PINE GROVE

Restoration efforts are under way to bring back a rare grove of whitebark pines in the June Mountain area.

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June Mountain Whitebark Pine Restoration Project

June Mountain Whitebark Pine Restoration Project

GREEN BUSINESS NETWORK

BECOME ONE.

Save money. Be a green leader. Increase business. Do your part for the Eastern Sierra business community. Help us overcome our carbon footprint and reduce our environmental impact.

June Mountain Whitebark Pine Restoration Project

June Mountain Whitebark Pine Restoration Project

Thank you!

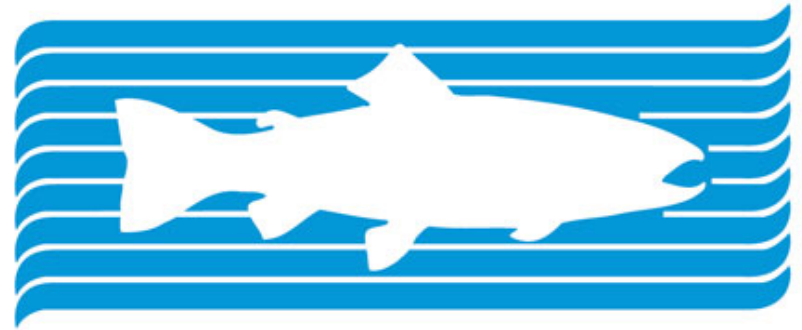


fish

water

people

CALIFORNIA TROUT



FISH · WATER · PEOPLE

November 5, 2019
Regular Meeting
Item # 7h

County Counsel

Additional Documents:
RCRC Comments on De-Energization

**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)

**RURAL COUNTY REPRESENTATIVES OF CALIFORNIA COMMENTS
ON PHASE 2, TRACK 1 OF ORDER INSTITUTING RULEMAKING
18-12-005**

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Rural County Representatives of California
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Tel: (916) 447-4806
E-mail: sheaton@rcrcnet.org

Dated: September 13, 2019

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**RURAL COUNTY REPRESENTATIVES OF CALIFORNIA COMMENTS
ON PHASE 2, TRACK 1 OF ORDER INSTITUTING RULEMAKING
18-12-005**

I. Introduction

In accordance with Rule 6.2 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure (“Rules”), the Rural County Representatives of California (RCRC) submits comments to the Order Instituting Rulemaking 18-12-005 (“Rulemaking”).

II. Comments

On behalf of the Rural County Representatives of California (RCRC), I am pleased to offer comments on the Phase 2, Track 1 rulemaking to examine electric utility de-energization of powerlines in dangerous conditions. RCRC received party status via written ruling on March 18, 2019. RCRC is an association of thirty-seven rural California counties, and its Board of Directors is comprised of elected supervisors from those member counties. Our comments are outlined via the topics listed in the Phase 2 Scoping Memo dated August 14, 2019.

In general, RCRC member counties are greatly affected by Public Safety Power Shutoffs (PSPS). Rural areas are often populated by a higher percentage of elderly persons that rely on electricity to sustain vital health care needs, and de-energization events also affect basic sanitary functions in many unincorporated areas because there is no power to operate domestic wells and

septic systems, thereby leaving many without the ability to bathe or flush toilets during a PSPS event. During recent outages, some residents have called 911 with emergencies ranging from requesting welfare checks on individuals whose care requires electricity, to requesting ambulances because oxygen supplies were running out.¹ RCRC member counties also contain the vast majority of the state's high fire hazard severity zones, which greatly increases the likelihood of PSPS events occurring in our member counties. Our comments are within the context of the rural experience with many of our residents living in high fire threat areas. We request the Commission hold utilities accountable to mitigate the real-world consequences of PSPS on impacted communities and customers and ensure that PSPS are only used as a last resort, rather than as an easy alternative to long-term hardening of utility infrastructure.

1. DEFINITIONS / STANDARD NOMENCLATURE

a. Should the Commission adopt an updated definition of Critical Facilities to include the transportation sector, Department of Defense Facilities, or other sectors?

The Commission should expand the definition of “Critical Facilities” and refine what that designation means for implementation purposes. Critical staging sites, including, but not limited to, municipal airports and fairgrounds, should be added to the list of Critical Facilities. To ensure optimal flexibility, staging sites that have a county Memorandum of Understanding (MOU) as a shelter site should also be considered a Critical Facility since they will become the sheltering location during a prolonged emergency, like a PSPS event. Some segments of the transportation sector may merit advanced notification, as gas stations will be unable to operate pumps during a PSPS event unless they have on-site backup generation. Given the potential duration of PSPS events during which residents will be unable to refuel their vehicles, there may be instances in which a PSPS event will create an unexpected surge in consumer demand at those facilities and for which the facility owners/operators may need to plan accordingly. Nevertheless, RCRC believes the CPUC would be better served by focusing on the overall strategic plan for facilities designated as “critical” and devote more discussion centering around what happens at these Critical Facilities. For instance, is it possible to exempt circuits with Critical Facilities from PSPS

¹ Gwendolyn Wu and Matthias Gafni, “PG&E restoring power after intentional shut-offs affect 20,500 customers,” San Francisco Chronicle, June 9, 2019. <https://www.sfchronicle.com/bayarea/article/20-000-customers-without-power-in-Butte-Yuba-13963671.php>

events? Should there be certain types of Critical Facilities for which utilities should be prepared to reenergize a circuit on short notice in the event of failure of on-site backup generation at the facility? Are Critical Facilities merely designated as such in order to receive advanced notification of a PSPS? What assistance can operators of Critical Facilities expect from IOU's before and during a PSPS, especially with respect to advanced planning, contingency planning, mitigation of impacts, and/or provision of back-up generation?

Without proper advance notification, certain facilities that need timely notification of a PSPS event could find themselves in an emergency situation that could easily be avoided. For example, PG&E's June 21, 2019 compliance report for the June 7-9 PSPS event omitted key details, including the de-energization of a correctional facility in Butte County housing nearly 600 inmates. As a safety precaution in response to the 2017 Oroville Spillway emergency, the Butte County Sheriff's office had to evacuate the county jail. This required transporting nearly 600 criminals with state and federal escorts via cars, vans, and busses over 150 miles to the nearest facility with available capacity in Alameda County. As a result of PG&E's deenergization of the circuit serving the local jail, the facility switched to its on-site backup generator, but that generator unexpectedly failed after several hours of operation, thereby compromising internal security and sanitary functions. Had the PSPS been of any longer duration, Butte County would have had to evacuate the facility, placing law enforcement officers and the greater public at risk through this endeavor.

The CPUC should require utility compliance reports to be more transparent with regard to the impact of the event on operations of Critical Facilities. For example, IOU's should specify Critical Facilities that were on de-energized circuits, how it worked with those Critical Facilities to provide advanced notice and on-going updates, any challenges faced by those facilities in responding to, or maintaining service during, a PSPS event, and actions undertaken by the IOU to mitigate those impacts and avoid threats to public health and safety. Finally, IOUs need to provide backup power generation for all Critical Facilities. In most cases, public health and safety can be compromised when Critical Facilities lose power during PSPS events and so it is important to ensure that those facilities do not bear the brunt of IOU malfeasance.

- b. What nomenclature should the Commission adopt to describe the various periods of a PSPS event (i.e. the period during which the IOU has formed its emergency operations center but has not yet de-energized power lines, the period during**

which a powerline is shut off, the re-energization period and post-event time period)?

While consistent nomenclature is a laudable objective, consistent processes are far more valuable during PSPS from a local government perspective. Butte County—home of the Camp Fire in Paradise—was only allowed to supply two email addresses to PG&E to receive PSPS information; however, those emails were not used during the PSPS event in June 2019. RCRC is unclear why PG&E would 1) create an arbitrary limit of contacts for official notification purposes, and 2) not use those contacts during the actual PSPS event. Counties are also finding that representatives from PG&E at various levels of the corporation are disseminating conflicting information about their PSPS events, which is confusing and not helpful for counties when communicating to their residents. A consistent process should be established and followed throughout all levels of PG&E’s chain of command.

c. Are there other terms that must be defined to ensure effective communication between utilities, Public Safety Partners, Critical Facilities and Critical Infrastructure and utility customers, e.g. “extreme wildfire conditions”?

During June 7-9, 2019 PSPS events, “official notification” was very unclear and should be revisited. For example, Butte County officials received a phone call from various PG&E representatives about the potential for a PSPS, however, PG&E officials reiterated that the phone call did not constitute “official notification.” What does “official notification” mean exactly? What are the implications of an “official notification”? Why would multiple representatives call various different officials, and not also use the designated email addresses for notification purposes to ensure accuracy and consistency? There should be a protocol for “official notification” throughout PG&E’s structure, and there should be consequences if it is not adhered to.

2. ACCESS AND FUNCTIONAL NEEDS (AFN) POPULATIONS

a. What efforts can result in more complete contact lists of AFN utility customers while still maintaining legal and privacy protections?

County health departments are a great resource to reach AFN populations. For example, county health personnel interact with residents who receive social services, like In Home Supportive Services (IHSS); IHSS provides low income individuals who are blind, disabled, or elderly with personal assistance and so they can safely stay in their homes. When Butte County received unofficial notice that a PSPS event could occur earlier this year in June, the county was

able to personally reach 1,100 affected people in the PSPS boundaries overnight and identify those who needed assistance, such as transportation, from the county during this emergency situation.

- i. What policies or laws affect the sharing of information between the electric IOUs and state and local governments to facilitate the identification of AFN populations for public safety purposes? What, if any, changes should be considered, and which entity or entities has the authority to make such changes?**

We encourage IOU's to share AFN and medical baseline customers with county health departments for more complete outreach to these populations during public emergencies, which is what a PSPS event amounts to. Senate Bill 821 (2018) established a mechanism for counties to "enter into an agreement to access the contact information of resident accountholders through the records of a public utility or other agency, including an electrical or gas corporation...for the sole purpose of enrolling county residents in a county-operated public emergency warning system." The CPUC should require IOU's enter into such agreements with interested counties and clarify that notifying AFN customers of a PSPS constitutes appropriate use of such information by a county-operated public emergency warning system.

- b. Are different methods of notification needed before, during and after PSPS events depending on the needs of an individual AFN utility customer?**

While a person with AFN may have a plan in place during a PSPS, their plans may change during a prolonged de-energization event and they may need help with transportation and other services that were previously unforeseen. Because PSPS puts AFN customers at greater risk of experiencing various health complications due to unreliable electricity, follow-through and follow-up notifications are essential throughout the PSPS event.

3. PSPS STRATEGY AND DECISION-MAKING

- a. What criteria should the Commission evaluate when assessing whether PSPS is being used as a measure of last resort?**

It is of utmost importance that PSPS be used as a last resort. While IOU's are using their own weather data and monitoring, they should also consult with fire and emergency experts before deciding to de-energize powerlines. The CPUC should consider whether the IOU is complying with all elements of their Wildfire Mitigation Plan (WMP) and at what speed when evaluating a PSPS. For instance, the CPUC should consider whether an IOU is experiencing delays with

inspections, vegetation management and system hardening. IOU's may be incentivized to trigger a PSPS if they have not done the necessary maintenance of their equipment in order to mitigate future liability in the event of a wildfire ignition.

b. Would adopting standardized wildfire risk criteria (e.g. wind speeds, weather conditions, vegetation dryness conditions, etc.) across utilities promote public safety, and if so, what criteria should be adopted.

Standardized wildfire risk criteria should not ultimately become a routine checklist used by IOU's to determine whether to de-energize power lines. There is a great diversity of weather conditions and vegetation across the state and emergency conditions in northern California may not mirror those in southern California. Again, de-energization events are a last resort. When employed, PSPS events put public safety at risk. Instead, IOUs should consult with fire experts like local fire response or the California Department of Forestry and Fire Protection (CAL FIRE) when determining if PSPS is appropriate to reduce wildfire ignitions from utility equipment during extreme weather conditions.

4. NOTIFICATION AND COMMUNICATION

a. 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?

While content is important, a consistent process of how an IOU gets information out to local government officials and the public must be improved. A rigid schedule of notification intervals may cause information fatigue. County officials may be better served if they have a designated utility contact during a PSPS event who could provide accurate and timely notification upon request. If local officials and customers had a process they could rely upon, then the information would be more valued and useful.

At the same time, information and guidance provided to customers should be tailored to the specific needs of particular jurisdictions. PG&E's current guidance to customers depending on electricity for medical needs is myopic and we believe would ultimately and inappropriately shift responsibilities to local agencies. They suggest that customers with medical needs "consider staying with a friend or relative during an outage" and to "check with local authorities regarding available resources."² The guidance to "consider staying with a friend or relative" ignores the fact

² https://www.pge.com/en_US/safety/emergency-preparedness/natural-disaster/wildfires/outage-readiness.page

that many of these customers may have mobility issues and that nearby “friends and relatives” are also likely to be impacted given the large geographic nature of individual PSPS events. For example, the June 2019 PG&E de-energization event impacted 22,000 customers in Butte, Napa, Solano, Yolo, and Yuba Counties while the October 2018 PG&E event impacted over 60,000 customers in Amador, Butte, Calaveras, El Dorado, Lake, Napa, Nevada, Placer, Plumas, Sierra, Sonoma, and Yuba Counties.

5. PSPS AND TRANSMISSION LINES

- a. What coordination is required between the electric IOUs and public safety partners, the California Independent Systems Operator, the Federal Energy Regulatory Commission and others to ensure safe PSPS events, which require the shut-off of transmission lines?**
 - i. In addition to those listed above, with whom must the electric IOUs coordinate to prepare for and notice transmission level PSPS events, e.g. adjacent affected jurisdictions, publicly owned utilities, etc., and how should such coordination occur?**

Larger-scale transmission level PSPS events amplify the emergency situation caused by unreliable electricity. That said, the process for transmission vs. distribution outages should be similar. Both are emergency events that put lives at risk. PG&E has suggested that some of their customers should consider staying with friends or relatives during a de-energization event, which is even more implausible if adjacent jurisdictions would be affected.³ Adjacent jurisdictions need to undergo preparation for impacts and an unexpected surge of people if neighboring communities evacuate or seek services, particularly from communities with large elderly and disabled populations.

- b. How should the Commission evaluate the impacts of transmission line PSPS versus distribution level PSPS, and what guidelines should be adopted to sufficiently prepare for and mitigate those impacts? For example, some facilities, such as airports and large industrial facilities, may be connected at the**

³ https://www.pge.com/en_US/safety/emergency-preparedness/natural-disaster/wildfires/outage-readiness.page

transmission level and may be impacted differently than in the case of distribution outages.

Because of the serious impacts a transmission line outage would cause, the CPUC should consider working with the Governor's office to declare a state of emergency when a transmission level PSPS event occurs in order to dedicate adequate resources to the situation. The CPUC should also consider consulting emergency officials and relevant agencies, such as the California Office of Emergency Services (CalOES) or CAL FIRE. Should the Governor sign it, Senate Bill 209 (2019), would establish a centralized state wildfire warning center to monitor fire weather and threat conditions statewide and oversee deployment of a network of automated weather stations in areas not covered by an electrical corporation or local publicly owned electric utility's weather network. Importantly, the center would coordinate with electrical corporations and local publicly owned electrical utilities to determine where to deploy weather monitoring stations in high fire threat districts. Increasing the amount and improving the quality of information on weather conditions will better guide decisions on how to manage those threats, better preposition scarce resources, and coordinate responses to fire events.

6. LESSONS LEARNED

a. Are there lessons learned from recent PSPS events (since the adoption of D. 19-05-042) that inform the topics under consideration in Track 1?

As referenced throughout this document, recent June 2019 PSPS events in Butte County have informed many topics under current consideration. Also, during the week of October 14, 2018, Amador, Butte, Calaveras, El Dorado, Lake, Napa, Nevada, Placer, Plumas, Sierra, Sonoma, and Yuba counties were advised they would likely experience power shutoffs due to severe winds that could trigger wildfires. Some of those residents went several days before power could be fully restored, thereby making it difficult to perform even basic sanitary functions. Left unanswered are consistent notification procedures, such as "official notice" from an IOU in advance of a PSPS, and how to resolve de-energization impacts at Critical Facilities. Given that the geographic area impacted by the October 14, 2018 de-energization experience was very large, we believe utilities must better tailor de-energization events to avoid unnecessary service disruptions. Back-up generation is costly and not always compatible with Critical Facility infrastructure, but IOU's should do more to ensure these facilities stay on energized circuits.

III. Conclusion

RCRC appreciates your consideration of our comments, and respectfully requests your acceptance of RCRC's comments for filing.

Dated: September 13, 2019

Respectfully submitted,

/s/ Staci Heaton

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