

**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)

**COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
TO THE PROPOSED DECISION ADOPTING DE-ENERGIZATION (PUBLIC SAFETY
POWER SHUT-OFF) GUIDELINES (PHASE 1 GUIDELINES)**

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In accordance with Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”)¹ hereby submits these comments to the *Proposed Decision Adopting De-Energization (Public Safety Power Shut-Off) Guidelines (Phase 1 Guidelines)* (“PD”), issued by President Michael Picker on April 26, 2019. Furthermore, pursuant to the *Email Ruling Adopting Protocol for Noting Party Status in Filings* (“E-Mail Ruling”) by Administrative Law Judge (“ALJ”) Melissa Semcer on March 12, 2019, CESA was granted party status in Rulemaking (“R.”) 18-12-005 on February 19, 2019 at

¹ 174 Power Global, 8minutenergy Renewables, Able Grid Energy Solutions, Advanced Microgrid Solutions, Aggreko, Alligant Scientific, LLC, AltaGas Services, Amber Kinetics, Ameresco, American Honda Motor Company, Inc., Avangrid Renewables, Axiom Exergy, Better Energies, Boston Energy Trading & Marketing, Brenmiller Energy, Bright Energy Storage Technologies, Brookfield Renewables, Carbon Solutions Group, Clean Energy Associates, ConEd Battery Development, Customized Energy Solutions, Dimension Renewable Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, EDF Renewable Energy, eMotorWerks, Inc., Enel X North America, Energport, Energy Vault, Engie Storage, E.ON Climate & Renewables North America, esVolta, Fluence, Form Energy, General Electric Company, Greensmith Energy, Gridwiz Inc., Hecate Grid LLC, Highview Power, Ingersoll Rand, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Lendlease Energy Development, LG Chem Power, Inc., Lockheed Martin Advanced Energy Storage LLC, LS Energy Solutions, LS Power Development, LLC, Magnum CAES, NantEnergy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., Nuvve, Pattern Energy, Pintail Power, Plus Power, Primus Power, PolyJoule, Quidnet Energy, Range Energy Storage Systems, Recurrent Energy, RES Americas, SNC-Lavalin, Soltage, Southwest Generation, Stem, STOREME, Inc., Sunrun, Swell Energy, Tenaska, Inc., Tesla, True North Venture Partners, Viridity Energy, VRB Energy, WattTime, and Wellhead Electric. The views expressed in these Comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. (<http://storagealliance.org>).

the prehearing conference² by virtue of filing comments on *Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions* (“OIR”) on February 8, 2019.³

I. INTRODUCTION.

CESA supports the PD and appreciates the Commission’s leadership in adopting Public Safety Power Shut-Off (“PSPS”) guidelines that consider the impact of de-energization events on customers. These guidelines create a tiered notice framework for de-energization that clarify the entities responsible for providing notification in a collaborative manner, the means by which the notification should be sent out, and the needed information required before, during, and after a de-energization event. CESA supports the guidelines as outlined in Attachment A and only provides brief comment at this time on Attachment B, which informs the preliminary list of issues to be addressed in Phase 2 of this proceeding. CESA believes that mitigation measures are needed to limit the scope and impact of PSPS events and thus recommends that Phase 2 of this proceeding leverage the protocols and guidelines adopted in Phase 1 to inform how distributed energy resources (“DERs”) such as energy storage can be deployed and utilized as mitigation solutions.

II. PHASE 2 OF THIS PROCEEDING SHOULD CONSIDER HOW THE PHASE 1 NOTIFICATION AND COMMUNICATION GUIDELINES CAN BE INTEGRATED INTO DISTRIBUTED ENERGY RESOURCES SCHEDULING AND OPERATIONS.

The proposed adoption of a systematic framework around communications and notifications during potential de-energization events is prudent as PSPS is leveraged as a tool to

² See *Reporter’s Transcript* at p. 17.

<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M268/K444/268444747.PDF>

³ *Comments of the California Energy Storage Alliance to the Order Instituting Rulemaking*, filed on February 8, 2019. <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M265/K165/265165647.PDF>

mitigate wildfire risks, even as a last resort measure. The focus in Phase 1 on the timing and prioritization of notifying affected entities and customers is a smart initial step to ensure that they are made aware of PSPS events and are prepared with alternative means to provide backup electricity, if possible.⁴ However, in Phase 2, the Commission will need to consider refinement and/or utilization of Phase 1 notification and communications protocols to support customers in mitigating the potential negative effects of de-energization. CESA envisions that the investor-owned utilities (“IOUs”) could not only leverage the Phase 1 guidelines to notify potential individuals of a de-energization event but also to notify DERs concurrently so they can optimize charging and be prepared to provide backup electricity prior to the de-energization event. Forecasts of the probability and duration of a de-energization event could support the scheduling of backup capacity of DERs that ensure that on-site DERs can be operated to serve on-site (critical) loads. For example, for energy storage systems, the advanced notice of a potential de-energization event would ensure that there is sufficient state of charge to ride through actual de-energization events and signal to energy storage systems to be reconfigured to islanding or microgrid mode.

The Phase 1 guidelines as proposed focus on notification and communication protocols targeted at public safety partners, water utilities, and communication providers so they can effectively respond to a de-energization event – potentially with the use of on-site DERs. Prioritization of communications to these critical entities is reasonable given their key role in maintaining order and responding to catastrophic outcomes. Longer term, however, CESA recommends that the Commission consider making these notifications and communications available to a broader population to allow as much of the affected population to effectively respond to de-energization events with the use of on-site DERs. Furthermore, CESA believes that the next

⁴ PD Attachment B at pp. 1 and 3.

phase of this proceeding should also explore how tiered thresholds based on variables such as wind speeds, weather conditions, and vegetation dryness could be explored to provide customers with some advanced notice of the probability of a potential de-energization event, which would better support the scheduling of backup capacity from DERs.

In sum, CESA recommends that the Commission add to the scope of Phase 2 how the Phase 1 notification and communication protocol can be incorporated into mitigation measures.

III. POST-EVENT REPORTING IS ESSENTIAL TO INFORM THE DEVELOPMENT OF EFFECTIVE PROGRAMS AND CONTRACTS.

CESA agrees with the Commission’s guidelines that the IOUs must deploy de-energization as a last resort measure and report on lessons learned from each de-energization event.⁵ After-the-fact reporting of actual de-energization events has the potential to support new resiliency-focused program designs as well as modifications to existing programs and contracts, such as the Self-Generation Incentive Program (“SGIP”), to be adapted to resiliency applications and contractual modifications needed for DERs to be prepared to provide resiliency services. For example, with these data points, the Commission may be able to leverage SGIP (*e.g.*, via locational or resiliency-focused adders or location-specific carve-outs) to target energy storage deployment in high risk areas, such as those identified by CalFire as Fire Hazard Severity Zones, that can ride through de-energization without the use of traditional generators. With the adopted definition of “vulnerable communities” in this proceeding overlapping a degree to adopted definitions for low-income customers and disadvantaged communities in SGIP, there may be additional opportunities to leverage the SGIP Equity Budget to target mitigation measures to customers that may be harmed by de-energization events.

⁵ PD at pp. 69-70.

Furthermore, CESA recommends that Phase 2 of this proceeding consider how post-event reporting could measure and evaluate the environmental impacts of backup diesel generators, which have greenhouse gas (“GHG”) emissions and local air pollutant impacts. The PD directs the IOUs to help critical facilities assess the need for backup diesel generators to be prepared for power shut-offs.⁶ While the primary focus of this proceeding should be on ensuring that critical facilities and other customers have backup power systems that ensure continued power despite de-energization events, CESA recommends that Phase 2 explore how cleaner backup systems could be deployed, where feasible, and establish a framework for reporting and data collection on backup power resources. Consistent with Senate Bill (“SB”) 100 to have 100% of California’s electricity generated from zero-emission sources by 2045, de-energization events have the potential to create a significant uptick in GHG emissions and local air pollutants from the use of backup diesel generators to provide continued on-site power delivery. By contrast, solar-plus-storage systems could be deployed to provide backup power capability using clean electricity generated from energy storage systems charged with on-site rooftop solar. The Commission should thus explore in Phase 2 how and where such cleaner mitigation measures could be deployed to reduce the reliance on GHG-emitting and polluting diesel generators in line with the state’s environmental goals while providing reliable backup power.

⁶ PD at p. 80.

IV. CONCLUSION.

CESA appreciates the opportunity to submit these comments on the Phase 1 PD and looks forward to collaborating with the Commission and stakeholders in this proceeding.

Respectfully submitted,



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