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 ON THE PROPOSED DECISION ADOPTING PHASE 2 UPDATED AND ADDITIONAL GUIDELINES FOR DE-ENERGIZATION OF ELECTRIC FACILITIES TO MITIGATE WILDFIRE RISK

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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") hereby submits these comments on the *Proposed Decision Adopting Phase 2 Updated and Additional Guidelines for De-Energization of Electric Facilities to Mitigate Wildfire Risk* ("PD"), issued by Commissioner Marybel Batjer on April 27, 2020. CESA was granted party status in Rulemaking ("R.") 18-12-005 on February 19, 2019 at the prehearing conference[1] 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.[2]

I. INTRODUCTION.

CESA generally supports the PD and commends the Commission for proposing modified and additional de-energization guidelines that will better mitigate the impact of Public Safety Power Shut-off ("PSPS") events for the upcoming 2020 wildfire season. Building off the Phase 1

[1] See *Reporter's Transcript* at p. 17. http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M268/K444/268444747.PDF

[2] *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

guidelines, the PD makes reasonable and prudent modifications and additions for the Phase 2 guidelines that will improve outreach and coordination, support better operational and infrastructural (*e.g.*, website bandwidth) preparedness, set performance standards that allow for circumstantial flexibility, and require greater information sharing and transparency. In addition, CESA supports the Commission's addition of the transportation sector to the list of "critical facilities" for priority notification of de-energization events, which ensures critical emergency response and preparedness generally but also supports the state's long-term transportation electrification goals. In many ways, the Commission makes improvements to the de-energization guidelines and protocols that can help mitigate the impacts of PSPS events.

While supportive of the improvements included in the PD, CESA believes that the guidelines could be revised further to encourage and enable key industry stakeholders to also play a role in identifying critical facilities and critical-needs customers and in managing de-energization processes. Undoubtedly, public-safety partners and local community stakeholders play a leading role in coordinating and managing the local response to potential PSPS events, but industry stakeholders also plays an important role as part of California's 2020 resiliency strategy, as evidenced by the various near-term measures adopted in the Self-Generation Incentive Program ("SGIP") and the Microgrids proceeding (R.19-09-009). The impact of PSPS events can be further mitigated with bottom-up support in siting Community Resource Centers ("CRCs") from the distributed energy resources ("DER") industry; meanwhile, DER aggregators and resource operators can play a role in: informing best practices on the de-energization Working Groups and Advisory Boards; ensuring seamless actual resilient response during actual PSPS events by incorporating them into an effective communications and notification plan; and supporting transportation and other infrastructure-related resilience through participation in the taskforce. To

ensure the coordination activities are manageable for the investor-owned utilities ("IOUs"), a focus on DER aggregators with large portfolio of resiliency-focused storage assets may be a prudent near-term approach, which can be broadened over time.

II. THE UTILITIES SHOULD BE DIRECTED TO DEVELOP CRITERIA TO BECOME AN ELIGIBLE COMMUNITY RESOURCE CENTER AND ENABLE BROADER SITING AND OPERATIONS OF PRIVATE COMMUNITY RESOURCE CENTERS.

CESA supports the determination in the PD that the IOUs should collaborate with relevant stakeholders to develop CRC plans. However, given the burden of setting a "hard limitation" that CRCs be located within a 30-minute drive, the PD loosened the requirements to focus on ensuring CRC availability that ensure at least two egress routes.[3] Furthermore, the PD set minimum operating hours for CRCs, with certain exceptions based on local government guidelines, recognizing the limitations of operating CRCs for longer hours due to employee safety considerations.[4] The Commission's determinations on the siting and operations of CRCs recognized the need for flexibility and practicality, in part due to the burden of doing so.

At the same time, while the January 30, 2020 Ruling by Administrative Law Judge ("ALJ") Brian Stevens did not include commentary on the rationale for the initial proposal, the initial 30-minute driving distance and the 24-hour operation requirement for CRCs suggest that the Commission was interested in ensuring public resources (*e.g.*, water, cell charging, electricity for medical devices) were widely and comprehensively available. CESA is concerned that the reduced requirements may not necessarily address the electricity and public-service needs of certain customers, who may not be able to just return home in the middle of a PSPS event when CRCs

[3] PD at 36.

[4] *Ibid* at 36-37.

close, especially those with critical medical equipment. The initial intent and merits of making CRCs accessible within a 30-minute drive and available on a 24-hour basis still remains, only being reduced due to the practicality of doing so with limited resources and staff.

Considering this, CESA believes that the Commission should encourage an all-hands-on-deck approach where private commercial facilities could also qualify to become a CRC, if positioned to do so and if able to meet the minimum operating requirements. Rather than relying solely on utility and governmental designations of CRCs and ratepayer/public funds to support their staffing and operations, a bottom-up process to allow private entities to qualify and register as a CRC during PSPS events would support the Commission's intent to establish a vast network of CRCs that could achieve something closer to the Commission's initial proposal. Some of the gaps from the siting of CRCs by the utilities and government agencies could thus be covered to some degree by private entities that are willing and able to do so. With some of the high-level criteria area already set forth in the PD in terms of minimum essentials, hours of operation, and ADA accessibility, the Commission should encourage additional entities to take action where they can in order to support customer and public resiliency.

Using such a bottom-up approach, the Commission will potentially be able expand the coverage of CRCs, beyond the areas immediately known to the public (such as schools and recreational facilities) but also those that can be made known to the public through effective communications and mapping of these additional locations. Furthermore, by expanding the number of CRCs available to customers, the Commission will also be able to leverage synergies with SGIP, which currently has an Equity Resiliency Budget to provide energy storage incentives to eligible customers in need of wildfire- or PSPS-related resiliency, which is dependent on, among other things, being designated as a CRC to provide support during PSPS events. Specifically,

"locations designated by the IOUs to provide assistance during PSPS events" were among the facilities that were deemed eligible for the Equity Resiliency Budget in D.19-09-027, and for the resiliency adder in D.20-01-021.[5] By expanding the number of CRCs through this bottom-up process, the Commission can more closely achieve the intent of the initial proposal and equip them with resilient operations via SGIP-funded storage projects. DER providers will also be empowered to help site, qualify, and develop additional CRCs that are equipped with resilient storage.

As such, in the CRC plan required by the IOUs within 60 days of the issuance of the decision, CESA recommends that criteria be developed to apply to become a CRC, along with a coordinated marketing and outreach plan that ensures that these additional locations are publicly known and accessible.

III. INDUSTRY STAKEHOLDERS SHOULD PLAY A ROLE IN PSPS PLANNING ACTIVITIES AND PROCESSES.

CESA agrees that the local government agencies and local community stakeholders play an instrumental role in managing and communicating imminent or ongoing PSPS events. However, private industry stakeholders are missing from the various coordinating bodies and activities that can inform best practices, operational preparedness, and resilience operations during and after PSPS events. A number of resiliency strategies have been developed in SGIP to ensure that storage projects tasked with providing resiliency are able to safely and reliably island their customer host loads during PSPS events. For example, it will be important to ensure that only critical loads are powered in cases where there is no critical load panel, such that certain non-critical loads must be manually powered down. In addition, R.19-09-009 is proposing the approval of tariff revision proposals to allow for "exceptional" grid charging for Net Energy Metering

[5] D.19-09-027 at 26 and D.20-01-021 at 47-48.

("NEM") systems paired with storage that ensures that the storage system has a sufficient state of charge ahead of and going into imminent PSPS events, where advanced communication and notification is needed to ensure effective delivery of resilience services.

With DERs, particularly storage, playing a critical role in the state's 2020 resiliency strategies, private industry stakeholders should play a role and be informed of PSPS planning activities and processes. While local governments may have such plans in place and both local governments and the IOUs may already be coordinating with industry stakeholders, given that they may in fact be the customers for many of the resiliency-focused storage project deployments, industry stakeholders should be broadly involved in informing communication and notification best practices on the de-energization Working Groups and Advisory Boards, as well as in developing protocols to notify DER aggregators who can broadly communicate to and prepare their DER systems for expected/likely resilience operations. Especially as the Advisory Boards will discuss, among other things, the use of emerging technologies, the very technology providers should be invited to participate and provide insights on how to improve PSPS protocols, processes, tools, and practices.[6]

Finally, the PD appears to broaden the scope of the taskforce from transportation resilience to water system and communications infrastructure resilience, ensuring that the IOUs work with the appropriate governing authorities to enhance the resilience of all types of infrastructure. CESA is supportive of this broadened scope and appreciates that the PD directed the IOUs to work with charging network providers to reinforce key transportation corridors and to communicate to electric vehicle ("EV") drivers the location, number, and accessibility of EV charging locations.[7]

[6] PD Finding of Fact 12.

[7] PD at 51 and Finding of Fact 46.

Similar collaboration and coordination with industry providers of EV charging equipment and energy storage systems should be directed on all infrastructure reinforcement planning and investment prioritization.

IV. CONCLUSION.

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

Respectfully submitted,

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CALIFORNIA ENERGY STORAGE ALLIANCE

May 18, 2020

Appendix A:
Revision to Findings of Fact, Conclusions of Law, and Orders

Recommended Revision to Findings of Fact, Conclusions of Law, and Orders

Findings of Fact

8. Regionalized de-energization Working Groups led by the large electric IOUs that include small multi-jurisdictional electric utilities, community choice aggregators, electric POUs, communications and water service providers, CPUC staff, tribal and local government entities, public safety partners, ~~and~~ representatives of people/communities with access and functional needs and vulnerable communities**, and key distributed energy resource industry stakeholders** that convene at least quarterly can help better inform the electric IOUs regarding how to plan and execute de-energization protocols.

12. If the electric IOUs coordinate service territory-wide Advisory Boards that consist of public safety partners, communications and water service providers, local and tribal government officials, business groups, non-profits, representatives of people/communities with access and functional needs and vulnerable communities, ~~and~~ academic organizations**, and key technology providers and industry stakeholders** they can leverage critical advice on best practices for de-energization issues and safety, community preparedness, regional coordination and the use of emerging technologies to better plan for de-energization events.

35. A CRC plan that includes siting and accessibility of CRC locations, CRC operations**, eligibility criteria to become a CRC,** and a determination of the resource needs to best serve the community members who visit would be beneficial in ensuring there is transparency and effective execution of CRCs. Such a plan that is created with consultation from regional local government, de-energization Advisory Boards, public safety partners, representatives of people/communities with access and functional needs, tribal representatives, senior citizen groups, business owners, community resource organizations, and public health and healthcare providers would be developed with broad input from impacted and knowledgeable contingents.

Conclusions of Law

1. Regionalized de-energization Working Groups led by the large electric IOUs that include small and multi-jurisdictional electric utilities, community choice aggregators, electric POUs, communications and water service providers, CPUC staff, tribal and local government entities, public safety partners, ~~and~~ representatives of people/communities with access and functional needs and vulnerable communities**, and key distributed energy resource industry stakeholders** that convene at least quarterly can help better inform the electric IOUs regarding how plan and execute de-energization protocols.

5. The electric IOUs should coordinate service territory-wide Advisory Boards that consist of public safety partners, communications and water service providers, local and tribal government officials, business groups, non-profits, representatives of people/communities with access and functional needs and vulnerable communities, ~~and~~ academic organizations**, and key technology providers and industry stakeholders**.

25. A CRC plan should include siting and accessibility of CRC locations, operations**, eligibility criteria to become a CRC,** and a determination of the resource needs to best serve the community members who visit. This plan should be created with consultation from regional local government, de-energization Advisory Boards, public safety partners, representatives of people/communities with access and functional needs, tribal representatives, senior citizen groups, business owners, community resource organizations, public health and healthcare providers, and wildfire Advisory Boards.

32. The electric IOUs should design a plan in coordination with charging network providers to reinforce networks and key charging locations with backup generation**, storage, or other alternatives**.