

**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)

**RESPONSE OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON THE  
MOTION OF PIONEER COMMUNITY ENERGY, SONOMA CLEAN POWER  
AUTHORITY, EAST BAY COMMUNITY ENERGY, MARIN CLEAN ENERGY, AND  
RURAL COUNTY REPRESENTATIVES OF CALIFORNIA FOR CONSIDERATION  
OF FAST TRIP PROGRAM RULES IN THE DE-ENERGIZATION RULEMAKING**

Jin Noh  
Policy Director

Grace Pratt  
Policy Analyst

**CALIFORNIA ENERGY STORAGE ALLIANCE**  
10265 Rockingham Dr.  
Suite #100-4061  
Sacramento, California 95827  
Telephone: (510) 665-7811  
Email: [cesa\\_regulatory@storagealliance.org](mailto:cesa_regulatory@storagealliance.org)

July 27, 2022

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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 this response on the *Motion of Pioneer Community Energy, Sonoma Clean Power Authority, East Bay Community Energy, Marin Clean Energy, and Rural County Representatives of California for Consideration of Fast Trip Program Rules in the De-Energization Rulemaking* (“Joint Motion”), submitted on July 12, 2022 by Pioneer Community Energy, Sonoma Clean Power Authority, East Bay Community Energy, Marin Clean Energy, and Rural County Representatives of California (jointly, the “Joint Parties”).

**I. INTRODUCTION.**

Throughout this proceeding, CESA has supported the Commission’s efforts to modify and refine the de-energization guidelines to help mitigate the impact of Public Safety Power Shutoff (“PSPS”) events with improved outreach and coordination, better operational and infrastructural (e.g., website bandwidth) preparedness, performance standards that allow for circumstantial flexibility, and greater information sharing and transparency requirements. However, as the Joint Parties explain in their Joint Motion, there has been a tremendous increase in unplanned Fast Trip-

related outages even as the investor-owned utilities (“IOUs”) use fewer pre-planned PSPS events to reduce wildfire risk.<sup>1</sup> Similar to the Joint Parties, CESA understands that the use of Fast Trip programs may be necessary to reduce wildfire risk but, since these programs are not currently overseen or regulated by the Commission, there is a critical need to ensure that the programs are reasonable, adequately regulated, and implemented in a manner that protects and maximizes public health, safety, and welfare.<sup>2</sup> To these ends, CESA supports the Joint Parties’ request to open an expedited phase or track of Rulemaking (“R.”) 18-12-005 to consider time-sensitive rules to ensure that the large IOUs’ Fast Trip Programs.

## **II. RESPONSE.**

As the Joint Parties detail in their Joint Motion, the scope and scale of the IOUs’ Fast Trip Programs are increasing at present and going forward, which have material impacts on customers well-being and livelihoods. While data is difficult to obtain, the Joint Parties cite how Pacific Gas and Electric Company (“PG&E”) reported nearly 600 Enhanced Powerline Safety Settings (“EPSS”) outages in 2021, affecting more than 650,000 customers and lasting 17.5 hours in duration on average.<sup>3</sup> The requested expedited track would improve data transparency on a wildfire mitigation measure that is similar in nature to PSPS events and would ensure reasonable regulations and oversight, including in regards to notification to customers.

In addition to the sound logic and basis for granting the Joint Motion, CESA adds that having greater data transparency and regulations around Fast Trip Programs would enable the potential development and/or refinement of frameworks, programs, and solutions, such as

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<sup>1</sup> Joint Motion at 1-2.

<sup>2</sup> *Ibid* at 13.

<sup>3</sup> *Ibid* at 7.

distributed energy resources (“DERs”) and energy storage, to mitigate the impact to customers of Fast Trip events when automatically triggered. Existing programs, such as the Self-Generation Incentive Program (“SGIP”) for example, leverage the existing PSPS definitions, protocols, and data to inform eligibility for solutions such as energy storage to provide onsite customer resiliency. Likewise, having and understanding regularly-available Fast Trip Program and EPSS data would inform the need and solution development for microgrid investments, such as those that would be considered within PG&E’s PPS Substation Microgrid Framework, which is currently being contemplated in the active Application (“A.”) 21-06-022 proceeding. The outputs of this expedited track in requiring reports/data and setting protocols for customer notification, for instance, can inform customer/technology eligibility, performance requirements, and operational parameters, among others, for new or refined programs and investments – some of which may already be targeting PPS mitigation and could be adapted to incorporate the growing need for Fast Trip and EPSS mitigation as well. As a result, given the significant benefit and need, CESA recommends that the Commission grant the Joint Motion.

### **III. CONCLUSION.**

CESA appreciates the opportunity to submit this response on the Joint Motion and looks forward to collaborating with the Commission and stakeholders in this proceeding.

Respectfully submitted,



Jin Noh  
Policy Director  
CALIFORNIA ENERGY STORAGE ALLIANCE

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