

NOVEMBER 18, 2019

Background on Public Safety Power Shutoffs

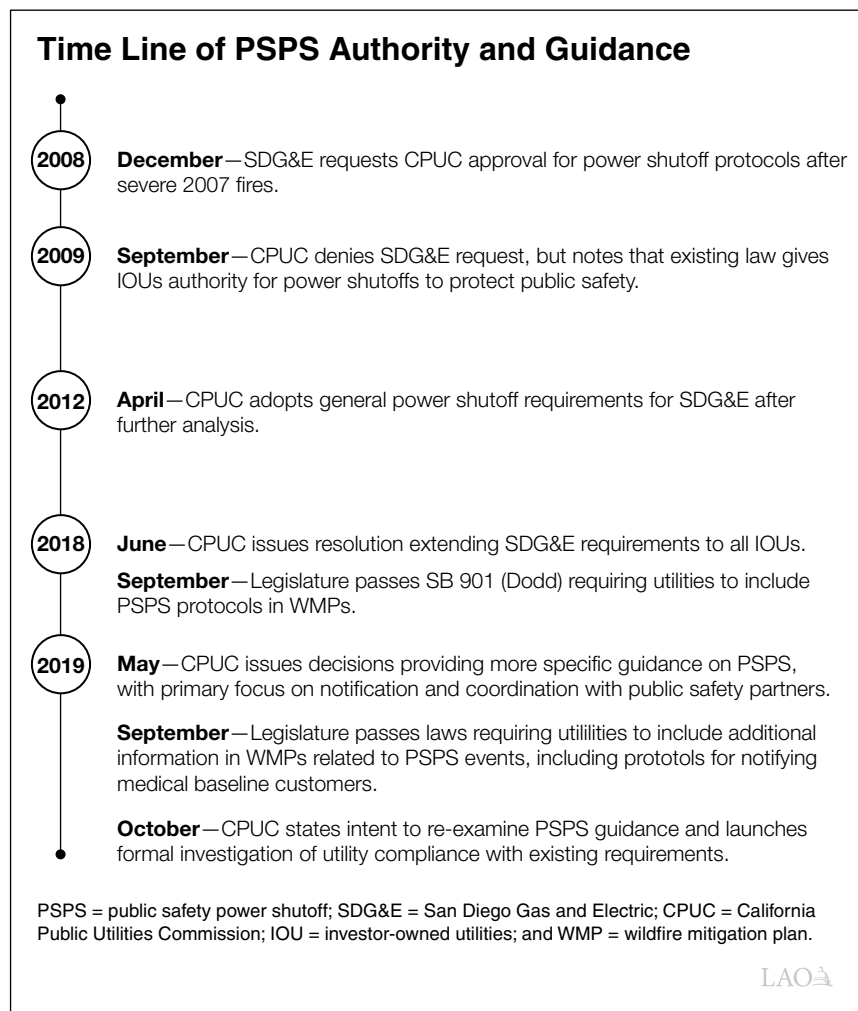
PRESENTED TO: Senate Energy, Utilities, and Communications
Committee
Hon. Ben Hueso, Chair



LEGISLATIVE ANALYST'S OFFICE

History of PSPS Authority and Guidance

In response to the growing threat of wildfire, utilities may proactively cut power to lines that might fail in windy conditions in order to reduce the likelihood that their infrastructure could cause a wildfire. Proactive power shutoffs are often called “de-energization” or a “public safety power shutoff (PSPS).” The figure below provides a general time line of PSPS authority and guidance. We describe the current guidance and authority in the next section.



State Role in PSPS Events

California Public Utilities Commission (CPUC) and state law have established requirements and guidance for investor-owned utilities (IOUs) implementing PSPS events.

▶ **CPUC Provides General Guidance for When Utilities May Deploy PSPS**

- For example, IOUs may only deploy PSPS as a measure of last resort and must justify why PSPS was deployed over other possible measures to decrease public safety risk.

▶ **Utilities—Not State—Determine When and Where Power Is Shut Off**

- CPUC provides guidance regarding what factors IOUs might consider when determining whether to shut power off—such as related to wind speed, humidity, and vegetation conditions—but state does not direct utilities to shut power off or approve shutoffs before they are implemented. These decisions are made by IOUs.
- CPUC has mostly conducted informal after-event reasonableness reviews. It conducted one formal review of San Diego Gas & Electric PSPS event in December 2017.

▶ **CPUC Requires That IOUs Notify Customers**

- **Whom to Notify.** Utilities must provide advance notice to all populations potentially affected, whenever possible. Utilities must prioritize notification to public safety partners and adjacent local jurisdictions that may lose power, as well as take extra steps to notify vulnerable populations.
- **Timing of Notifications.** For example, whenever possible, IOUs must provide at least 48 to 72 hours advance notification to public safety partners, and 24 to 48 hours advance notice to all other affected customers.



State Role in PSPS Events

(Continued)

- **Other Notification Requirements.** CPUC establishes requirements regarding the types of information that must be included in notifications, methods used to communicate, and protocols for coordination with emergency operations centers.

- ▶ **CPUC Requires Utilities to Coordinate With State and Local Agencies**
 - IOUs must coordinate with other state and local agencies, such as the Governor’s Office of Emergency Services (CalOES), before and during PSPS events. Specific requirements include (1) embedding a utility liaison in the local emergency operations center, when requested; (2) inviting representatives from CalOES and operators of critical infrastructure to sit in the utility emergency operations center; and (3) providing data about the location of potential PSPS events and customers affected.

- ▶ **CPUC Requires IOUs to Submit Post-Event Report Within Ten Days**

Reports must include the following information:

 - Decision criteria leading to de-energization and evaluation of alternatives that were considered.
 - Who the utility contacted prior to event, a copy of all notifications made, the number of notification attempts, and number of positive notifications achieved.
 - Description of engagement with public safety partners.
 - Lessons learned from PSPS event.



Mitigating Impacts on Vulnerable Populations

In accordance with state law and CPUC guidance, utilities must take extra steps to ensure customers who could be disproportionately impacted by the loss of electricity—such as people who have medical equipment powered by electricity—are notified of a potential PSPS.

▶ **Utilities Must Take Extra Steps to Notify Vulnerable Customers**

- Many of these activities relate to notifying “medical baseline” customers. Medical baseline offers discounted rates for customers who have higher energy needs due to use of certain medical equipment, such as respirators and motorized wheelchairs.
- Utilities provide medical baseline customers extra notifications in advance of a PSPS. If utilities are unable to confirm the customers have been notified by phone, email, or text, they send employees to the residence to make in-person contact.

▶ **Utilities Have Set-Up Community Resource Centers**

- Set up in public location with restrooms, water, electronic-device charging, and air conditioning.

▶ **CPUC Requires Utilities to Assist Critical Facilities Evaluate Power Needs During Shutoff**

- Utilities must assist critical facilities and infrastructure, such as hospitals, to evaluate their need for back-up power.
- Utilities are not required to provide back-up power to all facilities, but they must have back-up generation available for some facilities that need it.



Mitigating Impacts on Vulnerable Populations

(Continued)

- ▶ **Various State, Local, and Private Entities Provide Other Services to Vulnerable Populations**
 - For example, local agencies and community groups might also notify vulnerable populations of a potential PSPS and help ensure they are adequately prepared.
 - On October 27, 2019, the California Health and Human Services (CHHS) Agency established a nonemergency hotline for vulnerable residents and health and community care facilities during potential and actual PSPS events. CHHS also has a website that contains a variety of resources for vulnerable populations, including a guide to plan for emergency events; a map to pharmacies where residents can refill prescriptions; and links to crisis counseling, food banks, and organizations that provide services for seniors and persons with disabilities.
 - CalFresh beneficiaries can request replacement benefits if their food spoiled due to a power outage.



Support for PSPS Events in 2019-20 Budget

▶ **\$75 Million One-Time General Fund to CalOES to Prepare for and Respond to PSPS Events**

The budget provides flexibility for the administration to determine how to allocate these funds. According to the administration, emphasis is on protecting public safety, assisting vulnerable populations and individuals, and improving resiliency to PSPS events.

- **\$37.5 Million to Local Governments.** Eligible uses of funds include (1) back-up energy sources for essential facilities, such as fire stations, community centers, and health facilities; (2) back-up emergency communications equipment, such as battery-powered radios; (3) public education materials focused on preparedness for PSPS events; (4) developing plans to protect vulnerable populations and essential government functions; and (5) risk assessment of critical infrastructure.
- **\$37.5 Million for State Agencies and Departments.** Details of spending have not been determined by administration yet.

▶ **\$1.3 Million One-Time (Public Utilities Commission Utilities Reimbursement Account) for Eight Positions at CPUC to Establish Unit Dedicated to PSPS Oversight**

- Positions will be developing criteria for evaluating de-energization programs, ensuring utilities coordinate with first responders, ensuring effective notice is being given to affected stakeholders, and reviewing reasonableness of PSPS events.
- Previously no staff dedicated exclusively to PSPS policy and oversight.

