

PUBLIC UTILITIES COMMISSION

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April 7, 2023

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P.O. Box 770000
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SUBJECT: Notice of Violation – Pacific Gas & Electric 2021 Public Safety Power Shutoff Events

Ms. Allen:

On behalf of the Wildfire Safety and Enforcement Branch (WSEB) within Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC or Commission), Cindy Chen of my staff conducted compliance assessment of PG&E's 2021 Public Safety Power Shutoff (PSPS) post event reports. In 2021, PG&E initiated a total of five PSPS events and submitted five post event reports to CPUC. Stakeholders provided comments on these post event reports. On March 1, 2022, PG&E filed 2021 PSPS Post-Season Report which included additional information to the post event reports previously submitted. SED performed reviews on the submitted reports, including consideration of stakeholder comments, to evaluate PG&E's compliance with the reporting requirements under Resolution ESRB-8, D.19-05-042 and D.20-05-051, D.21-06-014 and D.21-06-034.¹

Our assessment revealed PG&E did not comply with certain provisions of Commission Resolution ESRB-8, D.19-05-042, D.21-06-014 and D.21-06-034.

- A. Resolution ESRB-8 states in part “[t]he report should include ‘The local communities’ representatives the IOU contacted prior to de-energization, the date on which they were contacted, and whether the areas affected by the de-energization are classified as Zone 1, Tier 2, or Tier 3 as per the definition in

¹ PG&E's last PSPS event in 2021 was October 14 – 16, before the effective date of October 18, 2021 when the Administrative Law Judge issued the email ruling of Template for PSPS Post-Event & Lessons Learned Reports. Hence SED did not perform the review for PG&E's compliance with the Template.

General Order 95, Rule 21.2-D” (ESRB-8 at 5).

A.1 PG&E reported the public safety partners contacted prior to de-energization, and the date and time these stakeholders were contacted. Among the five events in 2021, PG&E did not report the classified HFTD Tier classification for some affected areas, instead reporting N/A for the following four events:

- August 17 – August 19
- September 20 – September 21
- October 11 – October 12
- October 14 – October 16

However, PG&E did not explain why those affected areas did not have a HFTD classification or why those areas were non-HFTD.

B. **Resolution ESRB-8** states in part “[t]he IOU shall notify the Director of SED, as soon as practicable, once it decides to de-energize its facilities. If the notification was not prior to the de-energization event, the IOU shall explain why a pre-event notification was not possible. The notification shall include the area affected, an estimate of the number of customers affected, and an estimated restoration time. The IOU shall also notify the Director of SED of full restoration within 12 hours from the time the last service is restored” (ESRB-8 at 6.)

B.1. For the October 11 – October 12 event, on October 12, 9:58 PM, PG&E notified CPUC of the full power restoration. SED noted there were two circuits, TEJON 1102 and TEJON 1103, that were restored at 01:45 AM, October 13, and 10:50 PM, October 12. The restoration time for both circuits were after 9:58 PM, October 12, when PG&E notified CPUC stating it has successfully restored power in all areas. PG&E did not report the accurate restoration information to CPUC.

C. **D.19-05-042 Appendix A** states in part “[i]n addition to submitting a report to the Director of the Commission’s Safety and Enforcement Division within 10 business days of power restoration, electric investor-owned utilities must serve their de-energization report on the service lists of this proceeding and Rulemaking 18-10-007 or their successor proceedings. Service should include a link to the report on the utility’s website and contact information to submit comments to the Director of the Safety and Enforcement Division” (D.19-05-042 at A22).

C.1. For the following two events, PG&E’s service email did not include a link to the report on PG&E’s website.

- October 11 – October 12
- October 14 – October 16

D. **D.19-05-042 Appendix A** states in part “[i]n addition to the reporting requirements in Resolution ESRB-8, the electric investor-owned utilities must provide the following information: 1) Decision criteria leading to de-energization, including an evaluation of alternatives to de-energization that were considered and mitigation measures used to decrease the risk of utility-caused wildfire in the de-energized area” (D.19-05-042 at A22-A23.)

D.1. For the January 19 – January 21 event, PG&E explained several fire probability models, provided the actual readings of parameters such as maximum wind speed and FPI ratings; however, PG&E did not provide the criteria/threshold for the parameters that led to the decision to shut off power.

E. **D.19-05-042** states in part “the electric investor-owned utilities must provide notice when a decision to de-energize is made, at the beginning of a de-energization event, when re-energization begins and when re-energization is complete. The electric investor-owned utilities should, whenever possible, adhere to the following minimum notification timeline” (D.19-05-042 at A8).

- 48-72 hours in advance of anticipated de-energization: notification of public safety partners/priority notification entities
- 24-48 hours in advance of anticipated de-energization: notification of all other affected customers/populations
- 1-4 hours in advance of anticipated de-energization, if possible: notification of all affected customers/populations (D.19-05-042 at A8).

E.1. PG&E did not meet the 48-72 hours, 24-48 hours or 1-4 hours advance notifications to some public safety partners, critical facilities or other customers in the following events:

- January 19 – January 21
- September 20 – September 21
- October 11 – October 12
- October 14 – October 16

Table 1

Event	Notification Failure	Entity/Customer Accounts	PG&E's Explanation
Jan. 19 – 21	1 – 4 hours	5,099	PG&E sent out four to 12 hours in advance of the power being shut off.
Sep. 20 – 21	48 – 72 hours	50	35: change in weather patterns. 15: 23 minutes outage when an unplanned upstream SCADA sectionalizing device had to be used.
	24 – 48 hours	741	6: did not have valid contact info. 735: 23 minute outage when an unplanned upstream SCADA sectionalizing device had to be used.
	1 – 4 hours	2,371	1,615: PG&E does not send automated notifications to customers between the hours of 9:00 PM and 08:00 AM. 750: 23 minutes outage when an unplanned upstream SCADA sectionalizing device had to be used. 6: did not have valid contact info.
	No advance notification at all	756	750: 23 minute outage when an unplanned upstream SCADA sectionalizing device had to be used. 6: did not have valid contact info.
Oct. 11 – 12	48 – 72 hours	173	165: weather change, were not in scope originally. 8: an unplanned upstream sectionalizing device had to be used to meet the planned de-energization time.
	24 – 48 hours	3,086	69: no valid contact info.

Event	Notification Failure	Entity/Customer Accounts	PG&E's Explanation
			2,451: changing weather, not in scope originally. 555: use of an unplanned upstream SCADA sectionalizing device. 11: data quality issues.
	1 – 4 hours	22,816	21,833: PG&E does not send notifications between 9:00 PM and 08:00 AM. 874: use of an unplanned upstream SCADA sectionalizing device. 69: no valid contact info. 37: reclassify to non-PSPS outage. 3: under investigation.
	No advance notification at all	655	20: De-energized due to use of an unplanned upstream device. 69: no valid contact info. 555: use of an unplanned upstream SCADA sectionalizing device. 11: data quality issues.
Oct. 14 – 16	24 – 48 hours	1	no valid contact info.
	1 – 4 hours	666	665: PG&E does not send notifications between 9:00 PM and 08:00 AM. 1: no valid contact info.
	No advance notification at all	1	no valid contact info.

E.2. When de-energization is initiated, PG&E failed to notify some affected customers for the following events:

Table 2

Event	Customer Accounts	PG&E's Explanation
Jan. 19 – 21	5,099	PG&E sent out 4 to 12 hours in advance of the power being shut off and stated these serve as PG&E's De-Energization Initiated notifications
Sep. 20 – 21	2,853	2,112: PG&E does not send automated notifications to customers between the hours of 9:00 PM and 08:00 AM. 735: 23 minute outage when an unplanned upstream SCADA sectionalizing device had to be used. 6: no valid contact information on file.
Oct. 11 – 12	21,480	20,470: PG&E does not send notifications between 9:00 PM and 08:00 AM. 36: reclassify to non-PSPS outage. Due to the reclassification, the customers were flagged to no longer receive PSPS-related notifications. 905: use of an unplanned upstream device. 69: no valid contact information on file.
Oct. 14 – 16	628	627: PG&E does not send notifications between 9:00 PM and 08:00 AM. 1: no valid contact information on file.
Total	30,060	

E.3. Immediately before re-energization begins, PG&E failed to send notification of some affected customers for the following events:

Table 3

Event	Customer Accounts	PG&E's Explanation
Sep. 20 – 21	801	56: automated notifications were not turned on in time to notify these customers immediately before re-energization due to a delay in PG&E's communications process. 735: 23 minute outage when an unplanned upstream SCADA sectionalizing device had to be used. 4: reclassified to a non-PSPS outage. Due to the reclassification, the customers were flagged to no longer receive PSPS-related notifications.

Event	Customer Accounts	PG&E's Explanation
		6: no valid contact information.
Oct. 11 – 12	3,777	290: PG&E does not send notifications between 9:00 PM and 08:00 AM. 289: automated notifications were not able to be sent due to incomplete information (e.g., data entry errors in the field). 1,808: Due to the concurrent wind event some outages were initially thought to be wind related. 361: Some were restored earlier than anticipated. 125: issue with automated notification system. 69: no valid contact information. 60: data quality issues. 775: under investigation.
Oct. 14 – 16	35	1: no valid contact information. 33: due to data quality issues causing notifications to be assigned to the wrong PSPS event. 1: PG&E implemented ad-hoc Weather “All-Clear” Notifications via phone calls for this event. One customer was not notified due to not having a phone number.
Total	4,613	

E.4. When re-energization is complete, PG&E failed to send notification of some affected customers for the following events:

Table 4

Event	Customer Accounts	PG&E's Explanation
Sep. 20 – 21	1,128	61: automated notifications were not turned on in time to notify these customers immediately before re-energization due to a delay in PG&E's communications process. 280: PG&E's field crew did not properly complete fields in PG&E's Outage Dispatch Tool. 735: 23 minute outage when an unplanned upstream SCADA sectionalizing device had to be used. 39: reclassified to a non-PSPS outage. 6: no valid contact info.

Event	Customer Accounts	PG&E's Explanation
		3: not picked up by the system. 4: customer status change.
Oct. 11 – 12	2,648	768: Due to the concurrent wind event some outages were initially thought to be wind related. 1,700: PG&E does not send the notifications between 9:00 PM and 08:00 AM. 8: patrols would not begin until the October 14 event was completed. 69: no valid contact information. 60: data quality issues. 43: under investigation.
Oct. 14 – 16	2	1: no valid contact information. 1: PG&E implemented ad-hoc Weather “All-Clear” Notifications via phone calls for this event. One customer was not notified due to not having a phone number.
Total	3,778	

E.5. For the August 17-19 event, PG&E acknowledged due to data limitations at that time, PG&E was unable to provide a full breakdown of the notification failures. During this event, PG&E de-energized 48,155 customers.

F. **D.19-05-042** states in part “the electric investor-owned utilities must provide the following information: 2) ...the methods of notifications and who made the notifications (the utility or local public safety partners)” (19-05-042 at A22-A23).

F.1. PG&E did not provide the information of “who made the notifications.”

G. **D.19-05-042** states in part “the electric investor-owned utilities must provide the following information: 4) A description and evaluation of engagement with local and state public safety partners in providing advanced education and outreach and notification during the de-energization event (D.19-05-042 at A22-A23).

G.1 For the January 19 – January 21 event, PG&E did not provide the evaluation of such engagement. PG&E only stated “[f]ollowing the submission of this PSPS De-Energization Report, PG&E will provide the report to Public Safety Partners for review and feedback.”

H. **D.19-05-042** states in part “the electric investor-owned utilities must provide the

following information: 5) For those customers where positive or affirmative notification was attempted, an accounting of the customers (which tariff and/or access and functional needs population designation), the number of notification attempts made, the timing of attempts, who made the notification attempt (utility or public safety partner) and the number of customers for whom positive notification was achieved” (D.19-05-042 at A22-A23).

H.1. For the following two events, PG&E did not explain why no notification attempts were made to the below Medical Base Line (MBL) customers.

- 1) September 20 – September 21 event:
Total impacted MBL customers: 234
Total attempted notifications: 176
Total notifications not attempted: 58

There were 58 MBL customers without notification attempts made and PG&E did not provide an explanation.

- 2) October 11 - October 12 event:
Total de-energized MBL customers: 1,738
Total attempted notifications: 1,684
Total notifications not attempted: 54

There were 54 MBL customers without notification attempts made and PG&E did not provide an explanation.

I. **D.21-06-014** states in part “PG&E, SCE, and SDG&E must each provide information on the following notice topics, at a minimum, in the 10-day post-event reports: (1); (2) whether public safety partners/priority notification entities received notice 48-72 hours in advance of anticipated de-energization; (3) whether all other affected customers/populations received notice 24-48 hours in advance of anticipated de-energization; (4) whether all affected customers/populations received notice 1-4 hours in advance of anticipated de-energization; (5) whether all affected customers/populations received notice when the de-energization was initiated; (6) whether all affected customers/populations received notice immediately before re-energization begins; and (7) whether all affected customers/populations received notice when re-energization was complete (D.21-06-014 at 286.)

I.1. PG&E did not meet these minimum notification timelines. See details under Section E.

J. **D.21-06-014** states in part “Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company must serve, on the same day as filed with the Commission, the 10-day post-event reports as follows: (1) serve the report, as an attachment, via email on the service lists of Rulemaking (R.) 18-12-005 and R.18-10-007 (or the successor proceedings) and all lead affected local and county public safety partners; (2) when serving the 10-day post-event report, include in the email a link to the report on utility’s website; (3) when serving the report, include in the email instructions for how the public may submit comments (both formal and informal) to the Commission on the report” (D.21-06-014 at 303).

J.1. PG&E’s service did not include the report as an attachment for the events below:

- August 17 – August 19
- September 20 – September 21

J.2. PG&E did not provide a link to the report on the utility’s website for the events below:

- October 11 – October 12
- October 14 – October 16

K. **D.21-06-014** states in part “Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company must include, in the 10-day post-event report, a description of the de-energization threshold analyses, as part of lessons learned reporting, and the results of the utility’s examination of whether its thresholds are adequate and correctly applied in the de-energized areas” (D.21-06-014 at 305 & 306).

K.1. Although PG&E reported the threshold validation and the application of threshold in PSPS decision, PG&E did not report whether the thresholds were adequate after such examination.

L. **D.21-06-034** states in part “[p]rior to a PSPS event, immediately after the utility decides on which CRC locations to open during the PSPS event, the utility must provide notice to customers of the locations of the CRCs, the services available at each CRC, the hours of operation of each CRC, and where to access electricity during the hours the CRC is closed” (D.21-06-034 at A2).

L.1. PG&E’s customer notification scripts only states “For more information, including medical device charging resources, food replacement and other support, visit pge.com/pspsupdates or call 1-800-743-5002.” PG&E did not

report whether the link includes the locations of the CRCs, the services available at each CRC, the hours of operation of each CRC, and where to access electricity during the hours the CRC is closed.

M. **D.21-06-034** states in part “[e]ach electric investor-owned utility must make every attempt to provide notification of the cancellation of a de-energization event, or removal from scope, by notifying all affected entities, including public safety partners, within two hours of the decision to cancel” (D.21-06-034 at A11).

M.1. PG&E did not provide notification of the cancellation of a de-energization event, or removal from scope, by notifying all affected entities, including public safety partners, within two hours of the decision to cancel. See details in Table 5 below:

Table 5

Event	Recipients	Accounts	PG&E’s Explanation
Aug. 17 – 19	Customers	unavailable	Due to issues with the new process PG&E was employing to send notifications.
Sep. 20 – 21	Customers	4,510	Due to issues with the process PG&E was employing to send cancellation notifications.
Oct. 11 – 12	Public Safety partners	2	While PG&E did not send automated notifications to two tribes, Agency Representatives were in constant coordination with these tribes on event status.
	Critical Facilities	32	Due to time required to build out cancellation notification files after the decision had been made to remove the customers from scope, as well as customers being removed from scope during between 9:00 PM and 08:00 AM, at which point PG&E waits until the next morning to initiate the cancellation notifications.
	Customers	1,105	Time required to build out cancellation notification files after the decision had been made to remove the customers from scope, as well as customers being removed from scope during between 9:00 PM and 08:00 AM.

Event	Recipients	Accounts	PG&E's Explanation
Oct. 14 – 16	Public Safety partners	12	While PG&E did not send automated notifications to eleven counties and one city within two hours of the decision to remove the jurisdiction from scope, Agency Representatives were in constant coordination with these agencies on event status.
	Critical Facilities	209	Due to time required to build out cancellation notification files after the decision had been made to remove the customers from scope.
	Customers	6,377	Due to the time required to build out cancellation notification files.

Please advise me no later than May 7, 2023, of corrective measures taken by PG&E to remedy and prevent the future recurrence of the identified violations, or provide additional data that refutes the violations detailed in this Notice of Violation. Based on your response, this Notice of Violation may lead to an enforcement action. If you have any questions, you can contact Cindy Chen at (415) 660-8312 or email Cindy.Chen@CPUC.CA.gov.

Sincerely,



 Ronald DeMayo

Program and Project Supervisor
 Public Safety Power Shutoff Section
 Wildfire Safety and Enforcement Branch
 Safety and Enforcement Division
 California Public Utilities Commission

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
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