

PUBLIC UTILITIES COMMISSION

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April 7, 2023

Clay Faber
Director, Regulatory Affairs
San Diego Gas & Electric Company's (SDG&E)
8330 Century Park Court
San Diego, CA 92123

SUBJECT: Notice of Violation – San Diego Gas & Electric 2021 Public Safety Power Shutoff Events

Dear Mr. Faber:

On behalf of the Wildfire Safety and Enforcement Branch (WSEB) within the Safety and Enforcement Division of the California Public Utilities Commission (CPUC), Cindy Chen of my staff conducted a compliance assessment of San Diego Gas & Electric Company's (SDG&E) 2021 Public Safety Power Shutoff (PSPS) post event reports. In 2021, SDG&E initiated a total of two PSPS events – on January 14-16, 2021 and November 24-26, 2021 – and submitted two post event reports to the CPUC. On March 1, 2022, SDG&E filed its 2021 PSPS Post-Season Report which included amendments to the post event reports previously submitted. On May 6, 2022, SDG&E filed Corrections to 2021 PSPS Post-Season Report and Public Safety Power Shutoff Post Event Report for November 25-26, 2021. SED performed reviews on the submitted reports to evaluate SDG&E's compliance with the reporting requirements under Resolution ESRB-8, D.19-05-042 and D.20-05-051, D.21-06-014, D.21-06-034, and the Administrative Law Judge's email ruling of Post Event Reporting Template (Template). SED also considered stakeholders' comments in the evaluation.

Our assessment revealed SDG&E did not comply with certain provisions of D.19-05-042, D.20-05-051, D.21-06-014, D.21-06-034 and the Template.

D.19-05-042 Appendix A Requirements

Service of report. “[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).

The service email for November 24-26 post event report included a link to the report on SDG&E's website, but did not include the contact information to submit comments to the Director of the Safety and Enforcement Division. Instead, it stated "[m]embers of the public may submit comments on this report to the California Public Utilities Commission ("CPUC") by following instructions on CPUC's website (www.cpuc.ca.gov). The CPUC's Public Advisor's Office has established procedures for providing such comments, including via online form."

Decision criteria. "In 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).

For the January 14-16 event, SDG&E reported it considered various factors in calling a PSPS. It has not developed a specific PSPS algorithm that lists, quantifies, and calculates the weight of each factor that is incorporated into a PSPS. SDG&E has developed and published information regarding the factors that go into the determination of the fire environment severity which is included in the Fire Potential Index (FPI) and Santa Ana Wildfire Threat Index (SAWTI) sections of SDG&E's 2020 Wildfire Mitigation Plan (WMP). However, the information included in the FPI and SAWTI sections of SDG&E's 2020 Wildfire Mitigation Plan is not event specific. SDG&E did not provide the shut-off threshold/criteria for Fire Potential Index, wind speed or wind climatology percentile, live/dead fuel moisture values and temperature.

For the November 24-26 event, although SDG&E reported the PSPS decision-making framework, the forecasted and actual measurement of the weather parameters, SDG&E did not report the criteria or threshold such as FPI value leading to de-energization.

D.19-05-042 Requirements

Notice. "[T]he 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).

SDG&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 for its two PSPS events. In addition, SDG&E failed to notify some affected customers when de-energization was initiated, immediately before re-energization began, and when re-energization was complete as described in the table below:

- January 14-16 event

Table 1

Notification Failure	Explanation
SDG&E did not send the 48-72 hour notification to public safety partners prior to the estimated de-energization start time. SDG&E did not report this notification failure. ¹ No customers were de-energized in this event.	SDG&E did not explain why it failed to provide this notification.

- November 24-26 event

Table 2

Notification To	Notification	Accounts	Explanation
Public safety partners excluding critical facilities	48-72 hours	10	Database coding issue
Public safety	1-4 hours	Unavailable	SDG&E did not send the

¹ The date, time and content of the notifications (Appendix 2) indicated SDG&E did not send the 48-72 hour notification to public safety partners prior to the estimated de-energization start time. However, SDG&E did not report this notification failure.

Notification To	Notification	Accounts	Explanation
partners	imminent		notifications to public safety partners 1-4 hours in advance of anticipated de-energization, instead, SDG&E sent the "Public Safety Power Shutoff possible within 12 hours" notifications. SDG&E did not explain why it failed to send the notifications.
Critical facilities	48-72 hours	3	1: no contact information 2: system error.
Critical facilities	1-4 hours imminent	75	1: no contact information 74: system error
Critical facilities	No prior notification at all	3	1: no contact information 2: system error
Critical facilities	De-energization initiation	35	1: no contact information 34: system error
Critical facilities	Imminent re-energization	86	1: no contact information 85: system error
Critical facilities	Re-energization completion	73	1: no contact information 72: system error
All other customers	24-48 hours	231	38: no contact information 193: system error
All other customers	1-4 hours	1,043	38: no contact information 1,005: system error
All other customers	No prior notification at all	215	38: no contact information 177: system error
All other customers	De-energization initiation	884	38: no contact information 846: system error
All other customers	Imminent re-energization	672	38: no contact information 846: system error
All other customers	Re-energization completion	1,406	38: no contact information 1,368: system error

Notification details. “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).

SDG&E did not provide the information of “who made the notifications.”

“[T]he electric investor-owned utilities must convey to public safety partners at the time of first notification preceding a de-energization event information regarding the upcoming de-energization, including estimated start time of the event, estimated duration of the event, and estimated time to full restoration.” (D.19-05-042 at A16).

For the November 24-26 event, SDG&E's first notification (48-72 hours) to public safety partners did not include an estimated start time, duration or estimated time to full restoration. Instead, such information was included in the second notification (24-48 hours).

“[T]he electric investor-owned utilities must partner with local public safety partners to communicate with all other customers that a de-energization event is possible, the estimated start date and time of the de-energization event, the estimated length of the de-energization event, which may be communicated as a range, and the estimated time to power restoration, which again, may be communicated as a range” (D.19-05-042 at A17)

For both events in 2021, SDG&E's notification did not contain the estimated start date and time, the estimated length of the de-energization event, or the estimated time of restoration.

Accounting of positive notifications. “[T]he 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).

For the January 14-16 event, SDG&E reported it “successfully made affirmative notifications to MBL customers who were not reached by phone. SDG&E completed 14 in-person notifications for customers during this event.” SDG&E did not report the number of notification attempts made and the timing of attempts.

D.20-05-051 Requirements (Appendix A)

Community Resource Centers (CRCs). CRCs shall be operable at least 8:00 AM – 10:00

PM during an active de-energization event, with actual hours of operation to be determined by the local government in cases in which early closure of a facility is required due to inability to access a facility until 10:00 PM (D.20-05-051 Appendix A, p. 6).

For the November 24-26 event, SDG&E reported operation hours concluded at 10:00 PM unless otherwise noted due to power restorations, in which case the CRC was closed at the time of restoration. However, one CRC, Valley Center Branch Library, was open at 12:00 PM on November 25, instead of the required 8:00 AM. SDG&E did not provide an explanation of the deviation from the guideline requirement.

False Communications. Each electric investor-owned utility shall enumerate and explain the cause of any false communications in its post event reports by citing the sources of changing data (D.20-05-051 Appendix A, p. 4).

SDG&E did not accurately report false communications for either of the PSPS events.

- For the January 14-16 event, customers and public safety partners were notified about the potential PSPS but no de-energization occurred. SDG&E did not enumerate or explain the cause of this situation.
- For the November 24-26 event, according to the breakdown of notification failures, SDG&E had numerous communications failures with critical facilities and customers, including no advance notifications prior to the de-energization. However, SDG&E reported no false communications were sent during this event.

Quantitative and qualitative factors. “[T]hese reports shall include a thorough and detailed description of the quantitative and qualitative factors it considered in calling, sustaining, or curtailing each de-energization event (including information regarding why the de-energization event was a last resort option) and a specification of the factors that led to the conclusion of the de-energization event.” (D.20-05-051 at Appendix A, p. 9).

For both of the events in 2021, SDG&E did not report a thorough and detailed description of the decision criteria in the PSPS decision-making process.

D.21-06-014 Requirements

De-energization risks. Identify and quantify customer, resident, and the general public risks and harms from de-energization and clearly explain risk models, risk assessment processes, and provide further documentation on how the power disruptions to customers, residents, and the general public is weighed against the benefits of de-

energization. The IOU shall detail the threshold established for initiating a PSPS event. (D.21-06-014 at 284).

SDG&E modeled the opposing scenarios in accordance with the risk quantification framework, which uses a multi-attribute value function (MAVF) to quantify risk. Specifically, SDG&E presented the MAVF calculation methodologies and assumptions for each of the three attributes: Safety, Reliability, and Financial. Assumptions used include PSPS duration, pole restoration duration, and dollar per affected customers. The results of the wildfire/PSPS ratio were greater than 1 for each de-energized circuit, which supported SDG&E's decision to de-energize.

However, SDG&E did not detail the threshold established for FPI for initiating the PSPS event.

Availability of geospatial information. IOUs must provide “[a] statement verifying the availability to public safety partners of accurate and timely geospatial information, and real time updates to the GIS shapefiles in preparation for an imminent de-energization event and during a de-energization event” (D.21-06-014 at 124).

SDG&E made the following statement: “SDG&E verifies that local and State Public Safety Partners receive accurate and timely potential GIS Public Safety Power Shutoff (PSPS) outage information through the ArcGIS Online system 48-72 hours before the SDG&E Emergency Operations Center (EOC) has been activated for a PSPS event. The partners that do not have access to the ArcGIS Online system receive GIS shapefiles through SDG&E's Electronic Data Transfer (EDT) system.” SDG&E's statement only verifies the availability to public safety partners of accurate geospatial information in preparation of a de-energization event, it does not verify the availability of real-time updates to the GIS shapefiles during a de-energization event.

EOC invitations. IOUs must provide the names of all entities invited to the utility's Emergency Operations Center (EOC) for a de-energization event, the method used to make this invitation, and whether a different form of communication was preferred by any entity invited to the utility's Emergency Operations Center (D.21-06-014 at 132).

SDG&E did not report that it invited any entities other than Cal OES and CPUC to its EOC. SDG&E reported “[l]eading up to the PSPS season, SDG&E met with our public safety partners to determine the best method of communication and providing situational awareness during EOC activations. The result of the meetings was to host a daily agency coordination call. SDG&E did not host daily agency coordination calls with public safety partners and critical infrastructure providers for this event.” SDG&E further reported the various forms of communication with the public safety partners instead of daily agency coordination calls including the public safety partner portal, phone, and

email. Since the daily agency coordination calls is the preferred form of communication by the public safety partners, SDG&E did not meet this need.

Backup power information. The IOU shall provide an explanation of how the utility prioritized the distribution of available backup generation (D.21-06-014 at 300).

SDG&E reported “[m]any sites were pre-chosen as part of an analysis completed for the 2020-2022 SDG&E Wildfire Mitigation Plan Update parameters. SDG&E added temporary generators as part of SDG&E’s Community Generator Program where permitting issues prevented installation of new backup power systems.” SDG&E only reported the sites were pre-chosen and added additional temporary generators. SDG&E did not explain how it prioritized the distribution of available backup generation.

Service. The IOU must file and serve its post event report in R.18-12-005. Service shall include the report as an attachment, a link to the report on the utility’s website, and instructions for how the public may submit comments, both formal and informal, to the Commission on the report (D.21-06-014 at 303).

SDG&E filed and served the report on the service list and provided a link to the report on the utility’s website. However, for the November 24-26 event, the service did not include the report as an attachment.

Lessons learned: De-energization threshold analysis. “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 its 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 254).

SDG&E made a statement, “SDG&E believes its thresholds for de-energizing during this event were adequate. SDG&E will continue to monitor its performance throughout the season to determine whether changes to its thresholds are warranted. Such changes require more time to evaluate because they could involve updates to models, testing of those updates, and stakeholder engagement to institute those changes.” SDG&E did not describe how it examined and analyzed the thresholds, or whether the thresholds were adequate and correctly applied in the de-energized areas as part of the lesson learned.

D.21-06-034 Requirements (Effective June 29, 2021)

Cancellation notification. Each 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, Appendix A, p. 11).

For the November 24-26 event, SDG&E did not send out the cancellation notifications within two hours of the decision to cancel to 5 critical facilities and 2,503 customers due to no contact information in the system or a system error.

CRC notices. Prior 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, Appendix A, p. 1).

SDG&E's customer notifications only provide services available in the CRC and direct customers to SDG&E's website for CRC hours and locations. It did not inform customers where to access electricity during the hours the CRC is closed.

Multi-family building notices. Each utility must additionally notify multi-family building account holders, and make reasonable efforts to notify building managers, prior to conducting a proactive de-energization event (D.21-06-034, Appendix A, p. 9).

SDG&E did not report whether it notified multi-family building account holders or building managers. SDG&E reported it notified AFN Community Based Organizations (CBOs). AFN CBOs provide direct services to customers under the SDG&E AFN support model, including 211, paratransit, temporary hotel stays, emergency generators, county medical and social agencies, food support agencies, and non-profit networks. CBOs that have influence and directly or indirectly serve AFN communities within the SDG&E service territory and master metered residential property and mobile home park managers. However, SDG&E did not clearly state whether AFN CBO's services include proper and timely notifications to multi-family building account holders.

Requirements of Template for PSPS Post Event & Lessons Learned Reports issued by Administrative Law Judge in R.18-12-005 (PSPS Template) (effective October 18, 2021)

Positive notifications. For those customers where positive or affirmative notification was attempted, use the following template (Table 3) to report the 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.

Table 3: Positive Notification

<i>Designation</i>	<i>Total number of customers</i>	<i>Notification attempts made</i>	<i>Timing of attempts</i>	<i>Who made the notification attempt</i>	<i>Successful positive notification</i>
<i>Medical Baseline (MBL)</i>					
<i>MBL behind a master meter</i>					
<i>Etc.</i>					

(Template, p. 7).

For the November 24-26 event, SDG&E did not report the positive notifications to MBL customers behind a master meter.

Notification failure breakdown. If the utility fails to provide notifications according to the minimum timelines set forth in D.19-05-042 and D.21-06-034, use the following template (Table 4) to report a breakdown of the notification failure and an explanation of what caused the failure.

Table 4

<i>Notifications sent to</i>	<i>Notification Failure Description</i>	<i>Number of Entities or Customer Accounts</i>	<i>Explanation</i>

(Template at 8).

For the November 24-26 event, SDG&E did not send the notifications to public safety partners 1-4 hours in advance of anticipated de-energization; instead, SDG&E sent the “Public Safety Power Shutoff possible within 12 hours” notifications. SDG&E did not report this notification failure per the template.

Mitigation actions and impacts. The utility must report mitigation actions and impacts (both waterfall graph and map) including: sectionalization devices, temporary generation, microgrids, permanent backup generation, transmission switching, covered conductor, and any other grid hardening that mitigated the impact of the event (PSPS Template at 13-14).

SDG&E reported the mitigation measures and impacts in narrative. SDG&E did not

Clay Faber
San Diego Gas & Electric Company's (SDG&E)
April 7, 2023
Page 11

report the mitigation action and impacts in waterfall graph nor map for the November 24-26 event.

Please advise me no later than May 7, 2023, of corrective measures taken by SDG&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,

/s/ RONALD DEMAYO
Ronald DeMayo

Program and Project Supervisor
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Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
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