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May 5, 2023

Mr. Ron DeMayo
Program and Project Supervisor
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: San Diego Gas & Electric Company's Response to WSEB's Notice of Violation Letter for SDG&E's 2021 Public Safety Power Shutoff Events

Dear Mr. DeMayo,

The Wildfire Safety and Enforcement Branch (WSEB) within the Safety and Enforcement Division ("SED") of the California Public Utilities Commission (CPUC) issued a Notice of Violation ("NOV") that found that San Diego Gas & Electric Company ("SDG&E") violated a Commission Resolution, Administrative Law Judge's email ruling, and Decisions with respect to its execution and reporting of PSPS events in 2021. The NOV directed SDG&E to advise you 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 the NOV. SDG&E's corrective measures for all but one violation follows below. SDG&E respectfully refutes and requests clarification on one violation related to it not sending the notifications to public safety partners 1-4 hours in advance of anticipated de-energization as further detailed below.

2021 PSPS Event Violations

- 1) **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."**

SDG&E has updated the service email template included in its internal procedures as follows:

Subject: R.18-12-005: SDG&E PSPS Post-Event Report for MONTH DD – MONTH DD, YYYY

To Interested Parties of Record in R.18-12-005 and R.18-10-007:

Attached herewith please find **SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) PUBLIC SAFETY POWER SHUTOFF POST-EVENT REPORT FOR MONTH DD – MONTH DD, YYYY**. This document is being served by electronic mail in a word-searchable PDF format and has been filed with the CPUC Docket Office.

Due to the large size of the various components of the Post-Event Report, and pursuant to CPUC Rule of Practice and Procedure 1.10(c), only the PDF report is attached. All other files (geodatabase files and Excel workbook) are being served via the following link: <https://www.sdge.com/psps>.

Members of the public may submit both formal and informal comments on this report to the California Public Utilities Commission (“CPUC”) by following instructions on the 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. Comments may also be submitted directly to the Director of the Safety and Enforcement Division of the CPUC using the contact information below.

Leslie L. Palmer
Director, Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102
Email: Leslie.Palmer@cpuc.ca.gov

- 2) **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.**

SDG&E has corrected this in its November 2021 PSPS post-event report by following the template prepared and issued by SED in October 2021. Specifically, SDG&E provided its shut-off threshold/criteria for the factors it considers such as wind speed in the column

titled “Alert Speed” in Table 2 of its November 2021 post-event report. Although SDG&E has thresholds for FPI and wind speeds, it considers multiple factors/criteria when deciding to de-energize, and does not rely solely on wind speeds and FPI. The primary factors considered are as follows:

- Weather conditions: SDG&E’s Fire Potential Index (FPI) ratings, Red Flag Warnings (RFW) issued by the National Weather Service (NWS), and the Santa Ana Wildfire Threat Index (SAWTI);
- Vegetation conditions and SDG&E’s Vegetation Risk Index;
- Field observations and flying/falling debris;
- Information from first responders;
- Meteorological data, including 10-years of historical information from weather stations and 99th and 95th percentile winds;
- Expected duration of conditions;
- Location of any existing fires;
- Wildfire activity in other parts of the state affecting resource availability;
- Information on temporary construction

For corrective measures specific to FPI, please see SDG&E’s response to violation 3 below.

- 3) **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.**

SDG&E included its actual FPI values in Table 2 of its November 2021 post-event report and will continue to do so. Going forward, SDG&E will also include the following explanation and detail regarding the criteria and threshold of its Fire Potential Index (FPI) value leading to potential de-energization:

SDG&E’s FPI is a tool for making operational decisions which will reduce fire threats and risks. The FPI is issued for a seven-day period and reflects key variables such as the state of native grasses across the service territory (“green-up”), fuels (ratio of dead fuel moisture component to live fuel moisture component), and weather (sustained wind speed and dew point depression). Each of these variables is assigned a numeric value and those individual numeric values are summed to generate a Fire Potential value from zero (0) to seventeen (17), each of which expresses the degree of fire threat expected for each of the seven days included in the forecast. The numeric values are classified as “Normal” for 0-11, “Elevated” for 12-14, and “Extreme” for 15-17.

An Extreme FPI rating in the forecast coupled with winds forecast to approach alert speed levels would trigger PSPS protocols within Emergency Management. The FPI is an index that indicates the potential for large and catastrophic fires due to environmental factors described earlier that support rapid fire growth upon ignition. An Extreme FPI initiates PSPS criteria and is thus indicating that circuits within the districts forecasted to

be Extreme could be de-energized when wind speed thresholds (called alert speeds) are exceeded.

- 4) **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 [included in the notice of violation]**

SDG&E did not send the 48-72 hour notification to public safety partners for its January 2021 event because the National Weather Service issued a Red Flag Warning for the inland and mountain areas of Orange County the afternoon of Wednesday, January 13, 2021 to be in effect approximately 24 hours later from 4 pm Thursday January 14, 2021 until 4 pm Friday, January 15, 2021. Thus, the Red Flag Warning was not provided sufficiently in advance to enable the 48-72 notifications to occur. While this area is outside of the SDG&E service territory, out of an abundance of caution, on January 13, 2021 SDG&E activated the PSPS protocols and initiated notifications to the public safety partners. On January 15, 2021 SDG&E Meteorology department determined the weather conditions were not going to materialize in the SDG&E service territory at which point an all-clear message was sent to partners and the EOC was deactivated with no customer impacts. Accepting the variability of forecasted weather conditions, when possible, SDG&E will continue to send notifications to public safety partners 48-72 hours in advance of a possible PSPS.

SDG&E's notification failures for its November 2021 PSPS event were due to the following three reasons, all of which have been remedied to prevent this issue from reoccurring:

- Database coding issue – 22 contacts were not assigned in the database to a notification group category. Immediately after the 48-hour notification was issued, SDG&E was made aware of the situation and corrected all 22 contact records in the database, so they received all subsequent notifications. While the 22 individuals did not receive the initial notice, others within the organizations did receive notifications so there were no organizations that were left unnotified. Every year, SDG&E tests its notification to its public safety partners as part of its PSPS exercises. Any issues identified during these exercises are corrected prior to the typical start of fire season. However, there may be certain instances in which new public safety partners are added to the database after SDG&E has held its PSPS exercises. In addition to the exercises tests, the database is used several times throughout the year to invite them to workshops and trainings which is also a test of the contact database. Any emails that are bounced back are addressed immediately.
- No contact information – For customers who do not have contact information (home phone, mobile, and email), SDG&E reached out with direct communications in the form of a letters, and mailers to the mailing address on

file. This is part of an annual campaign to remind HFTD customers to update their contact information and sign up for outage notifications.

- System error – A system error was identified during the event causing 6,961 customer notifications to be blocked at the carrier level. As soon as the error was identified, SDG&E created an incident with the communications vendor to resolve the issue. The vendor addressed the escalated support ticket that day and made a configuration change on their equipment to match bandwidth under contract. Several months later the configuration was audited, and the changed configuration was still active. Accordingly, this system error should not happen again.

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

SDG&E notes that it did include the information of “who made the notifications” in its November 24-26 post-event report, but it concedes that the information could have been more clearly reported.

Specifically, SDG&E includes the following table as part of Appendix 1 – Customer Notifications which covers customer notifications. However, a column like the “Source” column below is not included in Appendix 2 – Public Safety Partner Notifications, Appendix 3 – CPUC Notifications or Appendix 4 – AFN Community Based Organization (CBO) Notifications because SDG&E includes copies of the actual email notifications sent to its public safety partners, the CPUC and its CBO partners. These email notifications show that the “from” field is either 1) SDGE Liaison Officer Notifications, 2) SDGE EOC Regulatory Notifications or 3) ES EOC SD – Customer Assistance AFN.

Public Safety Power Shutoff Post-Event Report: November 24 – November 26, 2021
Appendix 1 – Customer Notifications: Descriptions, Dates, Times, and Scripts of Notifications

Overview of Communications by Method¹

Notification Method	Total Notifications	Source
Cell Phone	84,060	SDG&E
Email	47,283	SDG&E
Landline/Home Phone	75,513	SDG&E
Text Message	188	SDG&E
Total:	207,044	

Nevertheless, SDG&E has updated its post-event Excel workbook template for its Appendices 1 through 4 to add a column titled “Who Made the Notification” to clearly report this information.

- 6) **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).**

SDG&E’s notification templates for its public safety partners have been reviewed and updated to include this information going forward. Specifically, the following language has been added:

“The estimated start time of event is (INSERT TIME AND DATE). We anticipate the event could last until (INSERT TIME AND DATE) with power being turned back on around (INSERT TIME AND DATE).”

- 7) **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.**

In 2022, SDG&E updated its PSPS customer notification scripts. Included in the updates was the addition of the following language to more clearly inform customers that SDG&E’s website contains the most up-to-date information on the estimated start date and time of the de-energization event, the estimated length of the de-energization event, and the estimated time to power restoration:

“Please visit SDGE.com/Ready for the most up to date information, including outage map, outage duration, estimated restoration times, Community Resource Centers, and additional support available.”

- 8) **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.**

SDG&E followed the template prepared and issued by SED in October 2021 for its November 2021 post-event report and will continue to do so, however, this template was not available for SDG&E’s January 2021 post-event report. The template includes a table to be populated by the utility for each post-event report as shown below for SDG&E’s November 2021 post-event report. Given that SDG&E will follow the SED issued post event report template going forward, additional corrective measures are not needed to remedy and prevent the future recurrence of this violation.

Table 4: Positive Notification

Designation	Total Number of Customers	Notification Attempts Made	Timing of Attempts	Who made the Notification Attempt	Successful Positive Notification
AFN	1,082	1,082	11/23/2021- 11/24/2021	SDG&E	1,082
MBL	47	47	11/23/2021- 11/24/2021	SDG&E	47

- 9) **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.

SDG&E uses the template issued by SED in October 2021 as a starting point and adds additional internal notes and comments to guide its team as they are preparing the post-event report. Although this requirement is clearly included in the template, SDG&E has added additional notes and comments to highlight this requirement and ensure that it is not overlooked going forward. SDG&E's CRC team also updated its internal operating procedures to align with this requirement from the post-event report template.

For this deviation, the Valley Center Branch Library CRC was opened at 12:00 pm rather than 8:00 am because power was shut off to the surrounding area between 2:00 am and 3:00 am respectively. As a result, it was not possible to open a CRC immediately. SDG&E's CRC program is only able to open at 8:00 am when the start of the PSPS event allows adequate time to mobilize resources. Since PSPS protocols are used as a last resort safety measure, we monitor for outage impacts in real time, which results in the need for at least 4-8 hours of lead time to physically open a CRC.

- 10) 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.**

SDG&E uses the template issued by SED in October 2021 as a starting point and adds additional internal notes and comments to guide its team as they are preparing the post-event report. Although this requirement is clearly included in the template, SDG&E has added additional notes and comments to highlight this requirement and ensure that it is not overlooked going forward. SDG&E will also remind its relevant subject matter experts of this requirement verbally and via email to confirm their understanding of what is required.

That said, SDG&E is prepared to enumerate and explain the cause of situations at issue, which involves some level of perceived defect in notice, including but not limited to, when customers were de-energized without any advance notifications and when customers are notified for de-energization, but end up with no power shut off.

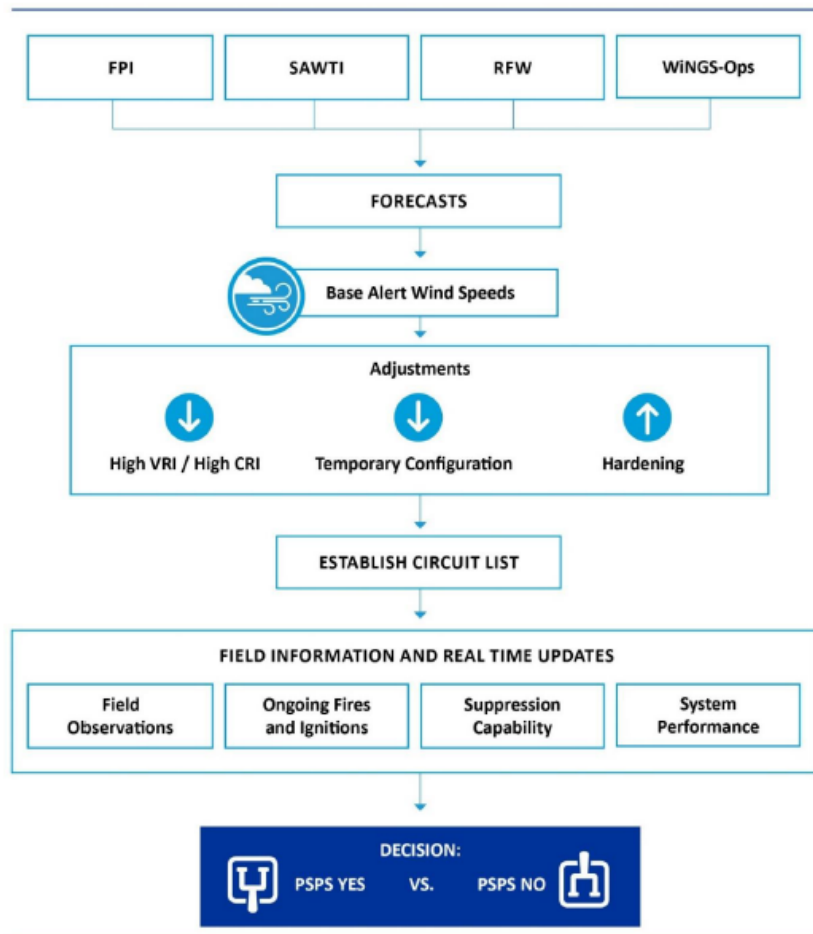
Generally, these customers were either initially in scope for de-energization based on weather forecasts but were ultimately not de-energized based on actual observed weather conditions during the Period of Concern or not in scope for de-energization but ultimately de-energized due to the sudden onset of weather conditions that required immediate de-

energization. In addition, once the Period of Concern passed, SDG&E sends cancellation notifications to customers that have been previously notified of a potential de-energization.

11) 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.

SDG&E uses the template issued by SED in October 2021 as a starting point and adds additional internal notes and comments to guide its team as they are preparing the post-event report. SDG&E has added additional notes and comments to highlight this requirement and ensure that additional detailed and thorough descriptions are included going forward. SDG&E will also remind its relevant subject matter experts of this requirement verbally and via email to confirm their understanding of what is required.

Specifically, SDG&E will include additional detail and explanations regarding its decision criteria in the PSPS decision-making process as shown in the diagram below. SDG&E will discuss each of the decision criteria below which include both quantitative and qualitative factors.



- 12) **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.**

Please see SDG&E’s response to violation 3 above.

- 13) **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.**

SDG&E confirms that it does provide real-time updates during a de-energization event, but it did not make that clear in its statement in its post-event report. Therefore, SDG&E has revised its statement to be included in future post-event reports as follows:

“SDG&E verifies that 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 period of concern for a PSPS event. They also receive accurate and timely real time updates to de-energized GIS PSPS outage information during a PSPS event through the same ArcGIS Online system. Public Safety Partners can export data from ArcGIS Online as GIS shapefiles. The partners that do not have access to the ArcGIS Online system receive accurate and timely GIS shapefiles through SDG&E’s PSPS External Data SharePoint Site, which are updated in real-time during a PSPS event.”

- 14) **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.

SDG&E has updated its internal procedures to require that it hosts daily agency coordination calls, which is the current preferred form of communication by its public safety partners.

- 15) **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.**

Going forward, SDG&E will include explanations regarding how it prioritized the distribution of backup generation such as the following:

Temporary, portable generators were deployed to pre-determined sites where critical infrastructure, such as food, fuel, emergency and communication services, and the safety of the public could be maintained with back-up energy resources. In addition, temporary, portable generators were deployed to community locations where permanent back-up energy was not installed, due to permitting delays. Additional deployments can be made in the middle of PSPS, but SDG&E will need to study the load profiles and complete a field evaluation to determine the most accessible and safest interconnection, possible. In addition, SDG&E is limited to a small fleet of operational generators, with internal and contract operators that will stand-by the asset for the entire duration of the PSPS. At this time, there are only four temporary microgrids that SDG&E operates, and they have established interconnections with operating procedures and switch plans, generators are staged in the proximity to the interconnection (usually within a couple of miles), and the generators are sized to meet the load demands of the microgrids. In addition, temporary microgrids that are located within the HFTD, must not have any overhead exposure, to limit any risks during a Santa Ana wind condition. SDG&E has converted overhead infrastructure to underground, and included isolation points from any overhead, for any microgrids that exist within the HFTD.

With respect to the November 2021 PSPS, only two of the temporary microgrids were engaged, because they are fed from the same distribution circuit that traverses through the HFTD, but the microgrids are located outside of the HFTD.

- 16) **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.**

SDG&E has updated its internal procedures to make clear that the PDF report must always be attached to the service email. However, given the large size of the other components (geodatabase files and Excel workbook) of the post-event report, a link will continue to be provided for parties to access and download these files.

- 17) **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.**

Going forward, SDG&E will describe how it examined and analyzed the thresholds, or whether the thresholds were adequate and correctly applied in the de-energized areas in its post-event reports. Below is the type of analysis and examination that SDG&E conducts that will be included.

SDG&E’s Fire Potential Index (FPI) is a tool for making operational decisions and it communicates the degree of fire threat expected in a 7 day forecast. The numeric values are classified as “Normal” for 0-11, “Elevated” for 12-14, and “Extreme” for 15-17. The accuracy of Fire Potential Index (FPI) was recently completed, and over the past 4.5 years, it has shown to be an effective tool at predicting when the environment supports fire, enabling the company to make changes to field crew and grid operations as appropriate. For the districts with the most infrastructure in the High Fire Threat District (HFTD), the validation of the FPI proved to be 87% accurate:

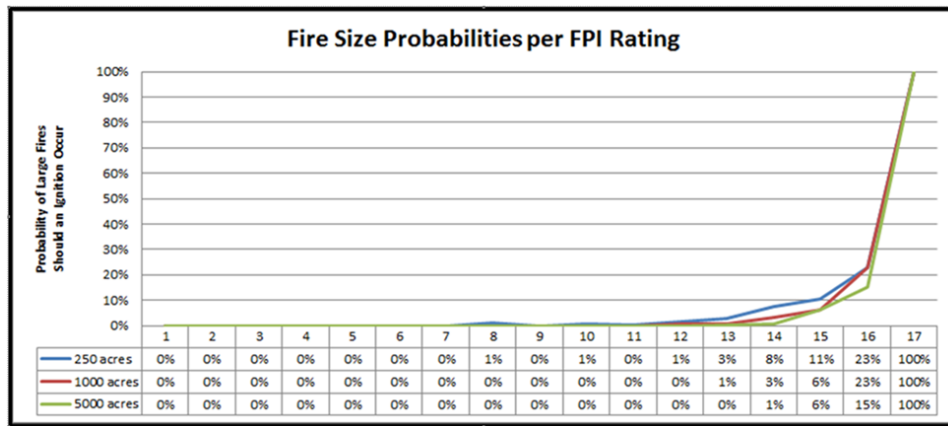
FPI Accuracy Since 2018

	ME	RA	EA	NE	OC	NC	BC	CM
Accurate	87%	87%	85%	86%	81%	92%	89%	89%
Over-Predicted	1%	2%	2%	1%	4%	2%	1%	1%
Under-Predicted	12%	12%	13%	13%	15%	6%	10%	10%

Over-prediction is most often due to planning for worst-case forecast scenarios that do not verify. Under-prediction found to have two main sources: (1) Weather station choice

for verification – use of stations with extreme conditions unrepresentative of majority of the district and (2) Limitations of the FPI formula, which does not account for high soil moistures immediately after rainfall that limits the fire potential before grass green-up can occur.

This graph below shows the correlation between fire growth to specific size thresholds and the FPI rating. This was achieved by conducting a 10-year historical WRF simulation and comparing to documented fires during the time period. The percent values can be interpreted with the following examples: (1) when the FPI was rated a 16, fires on the landscape exceeded 250 acres 23% of the time (2) and when the FPI was rated a 17, fires on the landscape exceeded 5000 acres 100% of the time.



Despite the accuracy of the Fire Potential Index, there is room for improvement. As such, SDG&E Meteorology has partnered with San Jose State University (SJSU) to examine the inputs and the algorithm with the goal of making improvements. Specifically, SJSU will start with the assessment of the accuracy of the Fuel Dryness assessment and will explore methods for error reduction by assimilating fuel moisture observations. They will investigate the potential dead fuel moisture errors and benefits of assimilating near real time 10 h dead fuel moisture observations to improve dead fuel moisture estimates for the purpose of the FPI estimates. The dead fuel moisture as represented by the water content of elevated fuels may not be the most effective proxy for the estimates of the flammability of fuels being in contact with moist ground. Therefore, SJSU will also investigate if additional soil moisture data could be incorporated to enhance the dryness component of the FPI. In the second phase, SJSU will focus on the live fuels and if needed will investigate the potential benefits of implementing high-resolution satellite-based multispectral fuel moisture estimates as a complement to the NDVI index. They also plan to perform a historical analysis of selected PSPS events to investigate the performance of the current version of FPI as well to assess the potential implications of the refined input data on the operational decisions utilizing FPI.

- 18) **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.**

Please see SDG&E's response to violation 4 above.

- 19) **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.**

Customer and public notifications direct residents to learn more about the PSPS by visiting sdge.com/Ready (before or during the PSPS). The landing page provides a map of affected areas and list of affected communities, along with any CRCs that are opened (including location and hours). Based on the map and information provided on the landing page, customers and the public are able to determine areas and local communities that are still energized in order to access electricity when a CRC is not open or available. Additionally, notification language is being updated to explain that customers and the public can visit sdge.com/ready to get information about where to access electricity.

- 20) **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.**

As part of SDG&E's PSPS notification process, all account holders including multi-family building account holders receive notices prior to conducting a de-energization. In addition to notifying all multi-family account holders through the standard notification process, SDG&E has conducted targeted campaigns to multi-family business managers to encourage them to sign up for notifications. For 2021, any multi-family business managers who signed up for notifications, would also have received them. Going forward, SDG&E will include this level of detail in its post-event reports to make clear that it did notify multi-family building account holders and subscribed building managers.

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

SDG&E's interpretation of Table 3 (shown below) from SED's PSPS post-event report template is that the other types of "designations" other than MBL were optional as noted by the "Etc." SDG&E only ensures positive notifications for MBL customers, whereas other utilities may do so for more than just MBL customers. Although SDG&E can confirm that it ensures positive notifications for all MBL customers, regardless of if they are behind a master meter or not, SDG&E's reporting system is currently incapable of

differentiating between MBL customers with their own meter and those behind a master meter.

While none of the CPUC’s decisions require the reporting of MBL customers behind a master meter, SDG&E is willing to update its reporting systems to make this data available for reporting going forward should SED confirm that breaking out MBL customers behind a master meter is required. Once confirmed, SDG&E will attempt to work with its system vendor to make the necessary changes in time for the 2024 fire season. However, any delays in SED’s confirmation may delay the go-live date for changes to SDG&E’s system.

Table 3: Positive Notification

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

22) 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.

SDG&E respectfully refutes this violation and requests clarification on the related requirement. It is SDG&E’s understanding that the notification 1-4 hours in advance of anticipated de-energization is not required to be sent to public safety partners pursuant to D. 19-05-042. Specifically, this decision requires that “[a]t a minimum, notification to public safety partners must occur when a utility activates its Emergency Operations Center in anticipation of a PSPS event or whenever a utility determines that de-energization is likely to occur, whichever happens first. In addition, the electric IOUs must provide notice when a decision to de-energize is made, at the beginning of a PSPS event, when re-energization begins and when re-energization is complete.”¹ D. 19-05-042 also requires that the electric investor-owned utilities adhere to the following minimum notification timeline:

- 48-72 hours in advance of anticipated de-energization: notification of public safety partners/priority notification entities

¹ D.19-05-042, p. A8-A9

- 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
- When de-energization is initiated: notification of all affected customers/populations
- Immediately before re-energization begins: notification of all affected customers/populations
- When re-energization is complete: notification of all affected customers/populations

As shown in the minimum notification timeline above, the notification 48-72 hours in advance of anticipated de-energization clearly states that it must be sent to public safety partners, however, the other notifications only mention “affected customers/populations.” Moreover, D. 19-05-042 specifies that the 1-4 hours notification should be provided only “if possible.” Accordingly, SDG&E respectfully disagrees with this violation and requests confirmation on whether the notification 1-4 hours in advance of anticipated de-energization is required for public safety partners.

23) SDG&E reported the mitigation measures and impacts in narrative. SDG&E did not report the mitigation action and impacts in waterfall graph nor map for the November 24-26 event.

SDG&E uses the template issued by SED in October 2021 as a starting point and adds additional internal notes and comments to guide its team as they are preparing the post-event report. Although this requirement is clearly included in the template, SDG&E has added additional notes and comments to highlight this requirement and ensure that it is not overlooked going forward. SDG&E will also remind its relevant subject matter experts of this requirement verbally and via email.

Respectfully submitted,

/s/ Brian D'Agostino

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