



DRAFT Staff's Unofficial Compendium of Public Safety Power Shutoff (PSPS) Guidelines and Rules (as of July 5, 2022)

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Table of Contents

Summary.....	2
A. Overarching Guidelines and Rules.....	4
B. Definitions	8
C. Notice	10
D. PSPS Post-Event Reporting	24
E. Requests to Delay De-Energization and to Re-energize	30
F. De-energization of Transmission Lines.....	30
G. Working Groups and Advisory Boards	30
H. Public Information, Education and Outreach – Ongoing Basis.....	33
I. PSPS Exercises.....	34
J. Community Resource Centers	35
K. Restoration of Power Service upon Conclusion of Public Safety Need for De-energization	37
L. Transportation, Communications, and Water System Resilience.....	37
M. Medical Baseline and Access and Functional Needs Populations.	37
N. Other Reporting	39
Appendix: Table of Current Reporting Requirements	46

Unofficial Compendium PSPS Guidelines and Rules (as of July 5, 2022) by Staff of the California Public Utilities Commission

Summary

This document represents efforts by the staff of the California Public Utilities Commission (CPUC) to incorporate into a single document the various guidelines and rules adopted by the CPUC on Public Safety Power Shutoff (PSPS). This document is referred to as the *Unofficial Compendium* to acknowledge that this document has not been adopted by the Commission but instead represents staff's effort to organize PSPS rules and guidelines by subject matter category to facilitate increased understanding of these rules and guidelines. The Unofficial Compendium includes conformed reference numbers and/or lettering.¹ This Unofficial Compendium was most recently updated as of July 5, 2022.

The PSPS guidelines and rules adopted by the CPUC and included in this Unofficial Compendium are as follows:

1. [Resolution ESRB-8 \(MS Word version\)](#) - July 12, 2018 (CPUC Resolution extending Decision (D.) 12-04-024 requirements to all electric investor-owned utilities (IOU))
2. [D.19-05-042](#) (Phase 1 Rules and Guidelines)
3. [D.20-05-051](#) (Phase 2 Rules and Guidelines)
4. [D.21-06-034](#) (Phase 3 Rules and Guidelines)
5. [D.21-06-014](#) (Corrective actions for late 2019 PSPS events of Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E) and Southern California Edison Company (SCE))

CPUC decisions and resolution are available on the CPUC's website. This Unofficial Compendium reorganizes the format of some of the rules and guidelines to promote ease of access and consolidates some of the directives adopted in D.21-06-014 but otherwise replicates the guidelines and rules verbatim, as set forth in the adopted CPUC decisions and resolution. The format, as indicated by the Table of Contents, largely follows the format from D.19-05-042.

Regarding post-event reporting, staff prepared a report template and issued it via an ALJ ruling dated October 18, 2021, which is accessible via the Commission's website at the following link: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M415/K875/415875311.PDF>.

Regarding pre-season and post-season reporting, the staff prepared report templates, which are accessible on the Commission's website at the following link: <https://www.cpuc.ca.gov/consumer-support/pmps/utility-company-pmps-reports-post-event-and-post-season>

¹ D.21-06-034 distinguishes the use of the terms "PSPS" from "de-energization" by clarifying that PSPS refers to "a broader range of topics, including, for example, notice before the power is shut off, than may be associated with just the 'de-energization' itself." (D.21-06-034, p. 53.) The Unofficial Compendium replaces prior references to "de-energization" with PSPS if such references involve a broader range of topics than just the de-energization itself.

List of Acronyms

CAISO:	California Independent System Operator
Cal OES:	California Governor’s Office of Emergency Services
Cal FIRE:	California Department of Forestry and Fire Protection
CCA:	community choice aggregator
CDT:	California Department of Technology
CPUC:	California Public Utilities Commission
CRC:	community resource center
D.:	Decision (of the CPUC)
IOU:	investor-owned utility
POU:	publicly-owned utility
PSPS:	Public Safety Power Shutoff
PG&E:	Pacific Gas and Electric Company
R.:	Rulemaking (of the CPUC)
SCE:	Southern California Edison Company
SDG&E:	San Diego Gas & Electric Company
SED:	Safety and Enforcement Division (of the CPUC)

I. Unofficial Compendium PSPS Guidelines and Rules

A. Overarching Guidelines and Rules

1. Reasonableness. (Resolution ESRB-8, p. 4.)

D.12-04-024 identified several factors that the Commission may consider in assessing whether an SDG&E decision to de-energize “was reasonable and qualifies for an exemption from liability under SDG&E’s Electric Tariff Rule 14.”² These factors are summarized below:

- a. SDG&E has the burden of demonstrating that its decision to shut off power is necessary to protect public safety.
- b. SDG&E must rely on other measures, to the extent available, as alternatives to shutting off power.
- c. SDG&E must reasonably believe that there is an imminent and significant risk that strong winds will topple its power lines onto tinder dry vegetation during periods of extreme fire hazard.
- d. SDG&E must consider efforts to mitigate the adverse impacts on the customers and communities in areas where it shuts off power. This includes steps to warn and protect its customers whenever it shuts off power.
- e. Other additional factors, as appropriate, to assess whether the decision to shut off power is reasonable.

2. Reasonableness applies to other IOUs. (Resolution ESRB-8, p. 4-5.)

- a. As other electric IOUs are developing and/or instituting PSPS plans, it is important that these factors be used to assess the reasonableness of all electric IOU PSPS events in order to ensure that the power shut off is executed only as a last resort and for a good reason.³ However, we modify the third factor listed above by adding the phrase underlined below:

- [The IOU] must reasonably believe that there is an imminent and significant risk that strong winds will topple its power lines onto tinder dry vegetation or will cause major vegetation-related impacts on its facilities during periods of extreme fire hazard.

- b. The reasonableness review discussion in D.12-04-024 and detailed above shall apply to all electric IOUs. At this time, we are not adding additional requirements and, while we recognize that this issue along with financial liability are important ongoing discussions, this resolution is not the venue for that discussion.

3. Reasonableness discussion (D.21-06-034, pp. 22-24)

Regarding reasonableness of a utility’s decision to shut off power under Pub. Util. Code §§ 451 and 399.2(a), past Commission decisions have consistently articulated the Commission’s authority to review such utility decisions, and that the Commission may consider such factors as:

² D.12-04-024, p.30. (Resolution ESRB-8, p. 4 at fn. 1.)

³ Original language in Resolution ESRB-8 refers to “de-energization plans” and “de-energization events.”

Unofficial Compendium PSPS Guidelines and Rules (as of July 5, 2022) by Staff of the California Public Utilities Commission

- necessity to protect public safety;
- the utility’s reliance on other available alternatives;
- whether the utility reasonably believed there was an imminent and significant risk of strong winds causing major vegetation-related impacts on its facilities during periods of extreme fire hazard;
- the utility’s efforts to mitigate the adverse impacts to its customers and communities in areas where the utility shut off power; and
- other factors as appropriate.

Implicit within the above factors, combined with the utilities’ responsibility to promote safety under Pub. Util. Code §§ 451 and 399.2(a), are the notions, articulated in D.19-05-042, that the utilities must weigh the “benefit” of de-energization (i.e., the reduced risk of harm from wildfires) against the potential public safety risks associated with shutting off power,⁶⁰ and that – because of the significant potential public safety risks associated with shutting off power -- the utilities must treat PSPS as a measure of last resort. [footnote 61 in original: D.19-05-042, at 69.]

Importantly, the question of whether to review the reasonableness of a utility’s decision to shut off power is at the Commission’s discretion, and because utilities have authority to shut off power under Pub. Util. Code §§ 451 and 399.2(a) and because such decisions are fact-specific, such review is conducted after the fact. The Commission has factors, as described above, that it may consider when reviewing the reasonableness of past decisions to shut off power; this is distinct, however, from establishing rigid triggers or criteria by which the utilities must abide to determine whether to shut off power. D.12-04-024 declined to adopt a “position that that SDG&E should be prohibited from shutting off power at wind speeds below 91 mph...It would be extremely dangerous to prohibit SDG&E from shutting off power when SDG&E reasonably believes there is an imminent danger of energized power lines falling onto tinder dry vegetation in Santa Ana wind conditions and there are no other safety measures available (e.g., automatic re-closers) to prevent a fire.” [footnote 62 in original: D.12-04-024 at 32.] While the Commission has not to date undertaken a review of the reasonableness of a utility’s decision to call a PSPS event, the Commission can do so at any time.

Regarding reasonableness of a utility’s efforts to implement a PSPS event, including providing notification and mitigating the safety impacts of de-energization after the utility has determined to shut off power under Pub. Util. Code §§ 451 and 399.2(a), the PSPS guidelines the Commission has established through Resolution ESRB-8, D.19-05-042 and D.20-05-051 are intended to enable Commission review of whether such implementation efforts were reasonable. Again, such review is likely so fact-specific that it is done after the fact, and again such review is at the Commission’s discretion, but the Commission did express an intent to consider whether to develop “reasonableness criteria” in this proceeding. [footnote 63 in original: D.19-05-042 at 109 and Appendix A at A25.] In this context, however, “reasonableness” is more appropriately understood as the reasonableness of an IOU’s PSPS implementation efforts. As part of this process, we clarify here that SED’s role is to review past de-energization events to determine whether utilities complied with the PSPS guidelines and rules. For these reasons, going forward, we will refer to SED’s review as a “compliance review,” rather than a reasonableness review.

4. Strengthened Requirements Applicable to all Electric IOUs. (Resolution ESRB-8, p. 5.)

Recent California experience with wildfires demands that we enhance existing PSPS policy and procedures. In order to ensure that the public and local officials are prepared for power shut off and aware of an IOU PSPS policy, and in order to ensure proper safety oversight by SED, we adopt the following:⁴

- a. The guidelines in D.12-04-024 shall apply to all electric IOUs.

⁴ Original language in Resolution ESRB-8 refers to “de-energization policy.”

Unofficial Compendium PSPS Guidelines and Rules (as of July 5, 2022) by Staff of the California Public Utilities Commission

- b. The guidelines shall be strengthened as described in ESRB-8 and the strengthened guidelines shall apply to all electric IOUs.
5. Clarification in Response to ESRB-8 Comments. (Resolution ESRB-8, p. 8.)
- In response to comments by the parties, we clarify that the requirements adopted in this resolution are not in conflict with IOU authority to de-energize power lines to ensure public safety provided under the PU Code. We expect an IOU to use its best judgment on a case-by-case basis to determine whether de-energization is needed for public safety. We hold this expectation even if an IOU has not complied fully with each of the requirements in this resolution, for example, if a need for de-energization arises before an IOU has met with the impacted local communities. If an IOU did not fulfill one or more of the requirements in this resolution prior to a de-energization, the IOU shall identify the missed requirement(s) and provide an explanation in its report submitted to the Director of SED after the PSPS event.⁵
6. Resolution ESRB-8 Findings. (Resolution ESRB-8, p. 8-9.)
- a. Under PU Code Sections 451 and 399.2(a), electric IOUs have the authority to shut off power in order to protect public safety.
 - b. The decision to de-energize electric facilities for public safety is complex and dependent on many factors including and not limited to fuel moisture; aerial and ground firefighting capabilities; active fires that indicate fire conditions; situational awareness provided by fire agencies, the National Weather Service and the United States Forest Service; and local meteorological conditions of humidity and winds.
 - c. The decision to shut off power may be reviewed by the Commission pursuant to its broad jurisdiction over public safety and utility operations.
 - d. The requirements for reporting, public outreach, notification, mitigation and reasonableness review in D.12-04-024 are effective, but [were] only applicable to SDG&E.
 - e. All electric IOUs may face similar safety situations requiring power shut-off in emergencies and PSPS events in their service territory.⁶
 - f. De-energization of electric facilities could save lives, protect property, and prevent fires.
 - g. The measures in D.12-04-024 should be [and were] strengthened to further ensure that the public and local officials are prepared for PSPS events and to ensure the proper safety oversight by the Commission's Safety and Enforcement Division (SED).⁷
7. The purpose of proactive de-energization is to promote public safety by decreasing the risk of utility-infrastructure as a source of wildfire ignitions. (D.19-05-042, p. A1.)
8. The electric IOUs must deploy PSPS as a measure of last resort and must justify why PSPS was deployed over other possible measures or actions.⁸ (D.19-05-042, p. A1.)
9. Customers should understand the purpose of proactive de-energization, the electric IOUs' process for initiating it, how to manage safely through a PSPS event, and the impacts if deployed.⁹ To accomplish this, the electric IOUs must: (D.19-05-042, p. A1.)
- a. develop and use a common nomenclature that integrates with existing state and local emergency response communication messaging and outreach and is aligned the California Alert and Warning Guidelines.

⁵ Original language in Resolution ESRB-8 refers to "de-energization event."

⁶ Original language in Resolution ESRB-8 refers to "de-energization events."

⁷ Original language in Resolution ESRB-8 refers to "de-energization events."

⁸ Original language in D.19-05-042 refers to "de-energization as a measure of last resort" and "why de-energization was deployed over other possible measures or actions."

⁹ Original language in D.19-05-042 refers to "de-energization event."

Unofficial Compendium PSPS Guidelines and Rules (as of July 5, 2022) by Staff of the California Public Utilities Commission

- b. develop notification and communication protocols and systems that reach customers no matter where the customer is located and deliver messaging in an understandable manner.
 - c. communicate to customers in different languages and in a way that addresses different access and functional needs using multiple modes/channels of communication.
10. Deploying PSPS requires a coordinated effort across multiple state and local jurisdictions and agencies. Coordination in preparation for de-energization is a shared responsibility between the electric IOUs, public safety partners, and local governments; however, the electric utilities are ultimately responsible and accountable for the safe deployment of PSPS.¹⁰ The electric IOUs must work with the California Governor’s Office of Emergency Services (Cal OES) to integrate their warning programs with the agencies and jurisdictions within California that have a role in ensuring that the public is notified before, during, and after emergencies. (D.19-05-042, p. A2.)
11. The electric IOUs, emergency responders, and local governments need to be seamlessly integrated when communicating PSPS notifications, with the goal that local governments provide supplemental or secondary notifications in the near future given the primary or initial notification to the public provided by utilities. For now, the utilities retain ultimate responsibility for notification and communication throughout a PSPS event.¹¹ (D.19-05-042, p. A2.)
12. Consequences of de-energization should be treated in a similar manner as any other emergency that may result in loss of power, such as earthquakes, floods or non-utility caused fire events. The electric IOUs must avoid development of duplicative or contradictory messaging and notification systems to those already deployed by first responders. (D.19-05-042, p. A2.)
13. The electric IOUs must coordinate with Cal OES and the California Department of Forestry and Fire Protection (Cal FIRE) to engage in a statewide public education and outreach campaign. The campaign must effectively communicate in English, Spanish, Chinese (including Cantonese, Mandarin and other Chinese languages), Tagalog and Vietnamese as well as Korean and Russian where those languages are prevalent within the utilities’ service territories. The campaign must convey, in advance of wildfire season, the immediate and increasing risk of catastrophic wildfires and how to prepare for them, the impacts of PSPS, how the public can prepare for and respond to a PSPS event, what resources are available to the public during these events, what to do in an emergency, how to receive information alerts during a power shutoff, and who the public should expect to hear from and when.¹² (D.19-05-042, p. A2-A3.)
14. The electric IOUs must report on lessons learned from each PSPS event, including instances when PSPS protocols are initiated, but de-energization does not occur, in order to further refine PSPS practices. In addition, the utilities must work together to share information and develop best practices across California.¹³ (D.19-05-042, p. A3.)
15. The electric IOUs must work together to share information and advice in order to create effective and safe PSPS programs at each utility and to ensure that utilities are sharing consistent information with public safety partners.¹⁴ (D.19-05-042, p. A3.)

¹⁰ Original language in D.19-05-042 refers to “Deploying de-energization” and “deployment of de-energization.”

¹¹ Original language in D.19-05-042 refers to “de-energization notifications” and “de-energization event.”

¹² Original language in D.19-05-042 refers to “impacts of de-energization” and “de-energization event.”

¹³ Original language in D.19-05-042 refers to “de-energization event,” “de-energization protocols,” and “de-energization practices.”

¹⁴ Original language in D.19-05-042 refers to “de-energization programs.”

B. Definitions

1. The term “first responder/emergency responder” refers to those individuals who, in the early stages of an incident, are responsible for the protection and preservation of life, property, evidence, and the environment, including emergency response providers. (D.19-05-042, Appendix A at A3.) (D.21-06-034, p. A6.)¹⁵
2. The term “emergency response providers” includes tribal, federal, state, and local governmental and nongovernmental public safety, fire, law enforcement, emergency response, emergency medical services providers (including hospital emergency facilities), and related personnel, agencies and authorities. (D.19-05-042, Appendix A at A4.) (D.21-06-034, p. A6.)¹⁶
3. The term “public safety partners” refers to first/emergency responders (defined in D.19-05-042, Appendix A at A3-A4) at the tribal, local, state, and federal level; water, wastewater and communication service providers; community choice aggregators (CCA); affected publicly-owned utilities (POU)/electrical cooperatives; the Commission; Cal OES; and Cal FIRE. Public safety partners will receive priority notification of a PSPS event, as discussed in subsequent sections. (D.19-05-042, Appendix A at A4.)¹⁷ (D.21-06-034, p. A6.)¹⁸
4. The term “critical facilities” and “critical infrastructure” refers to facilities and infrastructure that are essential to the public safety and that require additional assistance and advance planning to ensure resiliency during PSPS events. The Commission adopts an interim list of ‘critical facilities’ and ‘critical infrastructure’ but notes that the electric IOUs, in their Wildfire Management Plans, often list additional or differing facilities than those adopted here. The Commission strives to move towards a standardized definition and designation of ‘critical facilities’ and ‘critical infrastructure’ on a going forward basis, and the definition adopted here should not be construed as restrictive. The utilities must use the standard term ‘critical facilities’ or ‘critical infrastructure’ on a going forward basis in their PSPS procedures and Wildfire Management Plans. The electric IOUs should partner with local government and public safety partners in high fire risk areas to develop a list of critical facilities and critical infrastructure in those areas, and the utilities should be prepared to partner with the Commission to adopt a comprehensive list of types of critical facilities and critical infrastructure in the future. (D.19-05-042, p. A4-A5.)¹⁹

The Commission adopts the following interim list of critical facilities and critical infrastructure, as aligned with Department of Homeland Security’s Critical Infrastructure Sectors: (D.19-05-042, p. A5-A6. [footnote in original] *See* <https://www.dhs.gov/cisa/critical-infrastructure-sectors-at-p.21>. (D.19-05-042, p. A5 at fn. 1.)

¹⁵ Previous definition: The term “first responder/emergency responder” refers to those individuals who, in the early stages of an incident, are responsible for the protection and preservation of life, property, evidence, and the environment, including emergency response providers. (D.19-05-042, Appendix A at A3.)

¹⁶ Previous/original definition: The term “emergency response providers” includes federal, state, and local governmental and nongovernmental public safety, fire, law enforcement, emergency response, emergency medical services providers (including hospital emergency facilities), and related personnel, agencies and authorities. (D.19-05-042, Appendix A at A4.)

¹⁷ Previous definition: The term “public safety partners” refers to first/emergency responders at the local, state and federal level, water, wastewater and communication service providers, affected community choice aggregators and publicly-owned utilities/electrical cooperatives, the Commission, the California Governor’s Office of Emergency Services and the California Department of Forestry and Fire Protection. Public safety partners will receive priority notification of a PSPS event, as discussed in subsequent sections. (D.19-05-042, Appendix A at A4.)

¹⁸ Original language in D.21-06-034 refers to “de-energization event.”

¹⁹ Original language in D.19-05-042 refers to “de-energization events” and “de-energization procedures.”

Unofficial Compendium PSPS Guidelines and Rules (as of July 5, 2022) by Staff of the California Public Utilities Commission

This definition of “critical facilities and infrastructure” was modified by D.20-05-051, p. A10; and D.21-06-034, p. A5-A6, as follows:

- a. Emergency Services Sector
 - (1) Police Stations.
 - (2) Fire Stations.
 - (3) Emergency Operations Centers.
 - (4) Tribal government providers

- b. Government Facilities Sector
 - (1) Schools.
 - (2) Jails and prisons.
 - (3) Homeless Shelters.
 - (4) Community Centers.
 - (5) Senior Centers.
 - (6) Independent Living Centers, as defined by the California Department of Rehabilitation.
 - (7) Voting centers and vote tabulation facilities.

- c. Healthcare and Public Health Sector
 - (1) Public Health Departments
 - (2) Medical facilities, including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers and hospice facilities.²⁰
 - (3) Cooling (or Warming) Centers.
 - (4) Temporary facilities established for public health emergencies.

- d. Energy Sector
 - (1) Public and private utility facilities vital to maintaining or restoring normal service, including, but not limited to, interconnected POU's and electric cooperatives.

- e. Water and Wastewater Systems Sector
 - (1) Facilities associated with the provision of drinking water or processing of wastewater including facilities used to pump, divert, transport, store, treat and deliver water or wastewater.

- f. Communications Sector
 - (1) Communication carrier infrastructure including selective routers, central offices, head ends, cellular switches, remote terminals and cellular sites.

- g. Chemical Sector
 - (1) Facilities associated with the provision of manufacturing, maintaining, or distributing hazardous materials and chemicals.

- h. Public safety answering points are to be included in the definition of critical facilities to ensure 9-1-1 emergency services receive priority notification and any additional assistance necessary to ensure resiliency during PSPS events.²¹

- i. The transportation sector shall be included in the list of critical facilities and infrastructure to ensure transportation resiliency is a priority during PSPS events.²² The definition of transportation facilities and infrastructure for this purpose includes facilities associated with automobile, rail, aviation, major public transportation, and maritime

²⁰ Excluding doctor offices and other non-essential medical facilities. (D.19-05-042, p. A5 at fn. 2.)

²¹ Original language in D.20-05-051 refers to “de-energization events.”

²² Original language in D.20-05-051 refers to “de-energization events.”

transportation for civilian and military purposes. Also includes Traffic Management Systems.

- j. Food and Agriculture Sector
 - (1) Emergency Feeding Organization, as defined in 7 U.S.C. § 7501.
- 5. The term “access and functional needs populations” refers to those populations with access and functional needs as set forth in Government Code § 8593.3. Government Code § 8593.3 list ‘access and functional needs populations as follows: ...the ‘access and functional needs population’ consists of individuals who have developmental or intellectual disabilities, physical disabilities, chronic conditions, injuries, limited English proficiency or who are non-English speaking, older adults, children, people living in institutionalized settings, or those who are low income, homeless, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit or those who are pregnant. (D.19-05-042, p. A6-A7.)
- 6. The term “concurrent emergency” refers to a PSPS event overlapping with a secondary emergency event.²³ (D.21-06-034, p. A5.)
- 7. “Transmission-level customer” is defined as (1) a customer taking service directly from network transmission facilities under control of the California Independent System Operator (CAISO) and (2) POU’s and electric cooperatives. Each electric IOU must provide priority notification of any PSPS event to transmission-level customers. The designation of a customer as a transmission-level customer also requires the utility to, among other things, conduct PSPS Exercises with these customers (PSPS Exercises are addressed in a separate section of these guidelines and rules). (D.21-06-034, p. A7.)

C. Notice

1. Public Outreach, Notification, and Mitigation Requirements

- 1.1. D.12-04-024 requires that SDG&E provide notice and mitigation to its customers, to the extent feasible and appropriate, whenever SDG&E shuts off power pursuant to its statutory authority. As other electric IOUs are developing and/or instituting PSPS plans, it is important that this requirement for public outreach, notification, and mitigation apply to all electric IOUs in order to ensure that customers are impacted to the least extent necessary. We recognize that it is not practicable to have an absolute requirement that electric IOUs provide advance notification to customers prior to a PSPS event.²⁴ (Resolution ESRB-8, pp. 4-5)
- 1.2. All electric IOUs shall take appropriate and feasible steps to provide notice and mitigation to their customers in accordance with the guidelines in D.12-04-024 whenever they shut off power pursuant to their statutory authority. (Resolution ESRB-8, p. 9.)
- 1.3. All electric IOUs shall follow the notification requirements to SED established in D.12-04-024. (Resolution ESRB-8, p. 9.)
- 1.4. All electric IOUs shall comply with the additional guidelines stated in the section of Resolution ESRB-8 titled “Strengthened Requirements Applicable to all Electric IOUs.” (Resolution ESRB-8, p. 9.)
- 1.5. Increased coordination, communication and public education can be effective measures to increase public safety and minimize adverse impact from de-energization. (Resolution ESRB-8, p. 6.)

²³ Original language in D.21-06-034 refers to “de-energization event.”

²⁴ Original language in Resolution ESRB-8 refers to “de-energization plans” and “de-energization event.”

- k. The 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 PSPS 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.²⁵ (Resolution ESRB-8, p. 6.)
- l. [Note: The compliance date of this directive has passed.] Within 90 days of the effective date of this resolution, each IOU shall convene De-Energization Informational Workshops with representatives of entities that may be affected by a PSPS event, including but not limited to: state agencies, tribal governments, local agencies and representatives from local communities. Workshops should be inclusive of, but not limited to, representatives of customers who are low-income, have limited English, have disabilities, or are elderly. The purpose of these workshops is to explain, and receive feedback on, the IOU's PSPS policies and procedures. The workshops should be supplemented by focused working sessions, upon request by specific groups such as communications providers or CCAs that might have notification needs different than those of the general public.²⁶ (Resolution ESRB-8, p. 6.)
- m. [Note: The compliance date of this directive has passed.] Within 30 days of the effective date of this resolution, each IOU shall submit a report to the Director of SED outlining its public outreach, notification, and mitigation plan. The plan must include at a minimum, the following information:
 - (1) Names of communities that will be invited to De-Energization Informational Workshops.
 - (2) Names of state agencies and tribal governments that the IOU will coordinate with in developing its PSPS plan and will invite to De-Energization Informational Workshops.
 - (3) Names of local agencies the IOU will coordinate with in developing its PSPS plan and will invite to De-Energization Informational Workshops.
 - (4) Proposed communication methods for publicizing and convening the De-Energization Informational Workshops.
 - (5) Details regarding its plans for notification in advance of, and during, a PSPS event, and its plans for mitigation when de-energization occurs.²⁷ (Resolution ESRB-8, p. 6.)
- n. The IOU shall ensure that PSPS policies and procedures are well-communicated and made publicly available, including the following:²⁸ (Resolution ESRB-8, p. 6-7.)
 - (1) Make available and post a summary of PSPS policies and procedures on its website.
 - (2) Meet with representatives from local communities that may be affected by PSPS events, before putting the practice in effect in a particular area.
 - (3) Provide its de-energization and restoration policy in full, and in summary form, to the affected community officials before de-energizing its circuits.
 - (4) Discuss the details of any potential shut-off and mitigation measures that the communities should consider putting in place, including information about any assistance that the IOU may be able to provide during events.

²⁵ Original language in Resolution ESRB-8 refers to “de-energization event.”

²⁶ Original language in Resolution ESRB-8 refers to “de-energization event” and “de-energization policies.”

²⁷ Original language in Resolution ESRB-8 refers to “de-energization plan” and “de-energization event.”

²⁸ Original language in Resolution ESRB-8 refers to “de-energization policies” and “de-energization events.”

- o. In anticipation of a specific PSPS event, the IOU shall:²⁹ (Resolution ESRB-8, p. 7.)
 - (1) Notify customers of planned de-energization as soon as practicable before the event.
 - (2) As practicable and operationally feasible, notify and communicate with representatives from the fire departments, first responders, local communities, government, communications providers, and CCAs that may be affected by the PSPS event.
 - (3) Discuss with local government and community representatives the details of any potential shut-off and mitigation measures the IOU can provide to lessen the negative impacts of the power outage (e.g., cooling centers).
 - (4) Ensure that critical facilities such as hospitals, emergency centers, fire departments, and water plants are aware of the planned PSPS event.
- p. The IOU shall retain documentation of community meetings and information provided in electronic form, and make that information available to SED upon request. The information shall be retained for a minimum of one year after the PSPS event or five years after the community meetings, whichever comes first.³⁰ (Resolution ESRB-8, p. 7.)
- q. After the PSPS event, IOUs shall assist critical facility customers to evaluate their needs for backup power and determine whether additional equipment is needed. To address public safety impacts of a PSPS event, the IOU may provide generators to critical facilities that are not well prepared for a power shut off.³¹ (Resolution ESRB-8, p. 7.)
- r. The IOU shall retain records of customer notifications and make that information available to SED upon request. The information shall be retained for a minimum of one year after the PSPS event.³² (Resolution ESRB-8, p. 7.)

2. Timeline for Notice

2.1 Timing and Priority of Notice

- a. Recognizing that there may be times when advance notice is not possible due to emergency conditions beyond the electric IOUs' control, the electric IOUs must, whenever possible, provide advance notification to all populations potentially affected by a PSPS event. This includes, but is not limited to, public safety partners, critical facilities and infrastructure, access and functional populations, and jurisdictions that are not at threat of a utility-caused wildfire but may lose power as a result of de-energization elsewhere on the system.³³ (D.19-05-042, p. A7.)
- b. Consistent with the principles of the State Emergency Management System, whenever possible, priority notification should occur to the following entities, at a minimum:³⁴ public safety partners, as defined herein, and adjacent local jurisdictions that may lose power as a result of de-energization. Notice to all other affected populations, including access and functional needs populations, may occur after the utility has given priority notice; however, access and functional needs populations may require additional notification streams. This guideline is not meant to be restrictive; utilities may provide

²⁹ Original language in Resolution ESRB-8 refers to “de-energization event.”

³⁰ Original language in Resolution ESRB-8 refers to “de-energization event.”

³¹ Original language in Resolution ESRB-8 refers to “de-energization event.”

³² Original language in Resolution ESRB-8 refers to “de-energization event.”

³³ Original language in D.19-05-042 refers to “de-energization event.”

³⁴ The Commission’s adopted definition of public safety partners does not include critical facilities and infrastructure beyond water utilities and communication providers. The utility may, in partnership with first/emergency responders and/or local government entities, identify other critical facilities that should receive priority notice. This guideline is intended to set a floor, not a ceiling for priority notification. (D.19-05-042, p. A7, fn. 3.)

priority notification to a broader subset of customers, e.g., certain critical facilities, to promote public safety. (D.19-05-042, p. A7.)

- c. Each electric IOU must ensure that the public is able to access precise locality information of potential and active PSPS events. Each electric IOU must make every reasonable effort to provide clear communications of potential proactive de-energizations, based on week-ahead forecasts, as distinct from more likely proactive de-energizations, based on 48- or 24-hour ahead forecasts. The utilities may provide this communication of potential proactive de-energizations by providing a seven-day proactive de-energization potential rolling forecast, or by implementing an escalating notification system similar to the National Weather Service’s “weather watch” and “weather warning” system. This guidance regarding warnings of potential de-energizations does not modify or supersede requirements to provide customers with precise and accurate advance notifications regarding the location and estimated duration of an impending PSPS event, as required by D.19-05-042.³⁵ (D.21-06-034, p. A11.)

2.2 Timing of Notice

- a. Every effort must be made by the electric IOUs to provide notice of potential de-energization as early as the electric IOUs reasonably believe de-energization is likely. At 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. The electric IOUs should, whenever possible, adhere to the following minimum notification timeline:³⁶ (D.19-05-042, p. A8-A9.)
 - (1) 48-72 hours in advance of anticipated de-energization: notification of public safety partners³⁷/priority notification entities.
 - (2) 24-48 hours in advance of anticipated de-energization: notification of all other affected customers/populations.
 - (3) 1-4 hours in advance of anticipated de-energization, if possible: notification of all affected customers/populations.³⁸
 - (4) When de-energization is initiated: notification of all affected customers/populations.³⁹
 - (5) Immediately before re-energization begins: notification of all affected customers/populations.⁴⁰
 - (6) When re-energization is complete: notification of all affected customers/populations.
 - (7) When a PSPS event is cancelled: Each electric IOU must make every attempt to provide notification of the cancellation of a PSPS event, or removal from scope, by

³⁵ Original language in D.21-06-034 refers to “de-energization events.”

³⁶ Original language in D.19-05-042 refers to “de-energization event.”

³⁷ Consistent with Resolution ESRB-8, the electric IOUs must provide notice to the Commission’s Director of SED. (D.19-05-042, p. A8, fn. 4.)

³⁸ The Commission appreciates that it may not be possible at this juncture to know exactly when a de-energization will occur and to provide this level of advanced notification. However, the electric IOUs should strive to communicate that de-energization is imminent. (D.19-05-042, p. A8, fn. 5.)

³⁹ The electric IOUs must develop methods of communicating with public safety partners recognizing that communication channels may be affected by the loss of power. (D.19-05-042, p. A9, fn. 6.)

⁴⁰ Similarly, communication may be affected by the loss of power. (D.19-05-042, p. A9, fn. 7.)

notifying all affected entities, including public safety partners, within two hours of the decision to cancel.⁴¹ (D.21-06-034, p. A11.)

- b. PG&E, SCE, and SDG&E must prepare, in consultation with parties to this proceeding [I.19-11-013], a joint utility recommendation for clarifying the entities required to receive notifications 48-72 hours in advance of the de-energization and file the recommendation as a motion in R.18-12-005. (D.21-06-014, OP 11, p. 287.)

3. Who Should Be Responsible for Notification?

- a. The electric IOUs, as the entity with the most knowledge of and jurisdiction to call a PSPS event and subsequent re-energization, retain ultimate responsibility for development of the communication strategy and notification in advance of, during and after a PSPS event. However, the electric IOUs should immediately begin working with the Cal OES and local governments to develop their notification programs such that, wherever possible, the utilities' notification processes integrate into the Standardized Emergency Management System Framework, with the goal that local governments provide supplemental or secondary notification in the near future based upon pre-designed templates and scripts developed by the utilities in coordination with relevant state and local agencies. Supplemental notification does not supplant the electric IOUs' responsibility to provide notification to all customers.⁴² (D.19-05-042, p. A9.)
- b. The utilities must work with the goal of integrating into and leveraging existing outreach and notification systems wherever possible, rather than creating duplicative and potentially conflicting systems to those employed by local jurisdictions/emergency/first responders. (D.19-05-042, p. A10.)
 - (1) Each electric IOU must, to the extent possible, update its notifications uniformly across related platforms, for example, public facing notifications on its website(s), in its notifications to the media, and in its notifications to local and tribal government Public Information Officers so that customers obtain the same information in a timely manner regardless of how they receive or source the information. (D.21-06-034, p. A12.)
 - (2) To the extent feasible, prior to de-energization, each electric IOU must provide, in a standardized format, notices to public safety partners containing the following information:
 - a) Consolidated lists of impacted meter information, device information, and address information;
 - b) Estimated time intervals for de-energization, re-energization, and "all clear" notices; and
 - c) Maps and shapefiles with each notice from the outset (i.e., from the 72-hour notice through the restoration of service).Electric IOUs may provide the above information by including a link to the corresponding information in the utilities' public safety partner secure web portals. The electric IOUs must coordinate with public safety partners to develop a file naming convention and to standardize the format of files in a way that maximizes efficiency and ease of reference for public safety partners. (D.21-06-034, p. A12-A13)
 - (3) PSPS event information updates sent to public safety partners must be consolidated to the extent possible for each event, as opposed to disparate items of information being sent serially.⁴³ (D.21-06-034, p. A13.)
 - (4) When communicating with public safety partners, each electric IOU must make reasonable efforts to ensure that all electronic files and email subject lines use clear

⁴¹ Original language in D.21-06-034 refers to "de-energization event."

⁴² Original language in D.19-05-042 refers to "de-energization event."

⁴³ Original language in D.21-06-034 refers to "de-energization event."

file-naming conventions that differentiate between events and include the time of the update. (D.21-06-034, p. A13.)

- (5) Each electric IOU must, as immediately as possible if they have not already done so, establish a portal for public safety partners to view information as well as provide an Application Programming Interface (API) for public safety partners to automatically export data. Each electric IOU must review and respond to requests for access to their secure public safety partner portals within one business day of receiving a request. (D.21-06-034, p. A13.)

4. Notice for different groups and customers

4.1 First/Emergency Responders/Public Safety Partners

- a. The electric IOUs must work with local and county officials to identify appropriate emergency/first responder points of contact. This may include local government points of contact for jurisdictions that share first responder resources. The electric IOUs must identify 24-hour contact points and must identify secondary contacts at a minimum and tertiary contacts if possible. The electric IOUs must also identify primary and secondary means of communication for each contact. (D.19-05-042, p. A10.)
- b. The electric IOUs must provide utility personnel 24-hour points of contact, including secondary and tertiary contacts to affected local jurisdictions/first responders. (D.19-05-042, p. A10.)
- c. The electric IOUs must identify clear points of contact for all other public safety partners, including affected CCAs, publicly owned utilities/electric cooperatives, water and communications providers. The electric IOUs must have 24-hour contacts with secondary contacts at a minimum and tertiary contacts if possible. The electric IOUs must also have clear points of contact at the Commission, Cal OES and Cal FIRE. (D.19-05-042, p. A10-A11.)
- d. To ensure accuracy of contacts, the electric IOUs are required to update lists annually at least two months in advance of the start of the wildfire season and conduct communication exercises prior to wildfire season to confirm their ability to rapidly disseminate information. The electric IOUs should work with points of contact to encourage proactive updating of information in the event of a change, beyond the annual update required of the utilities. (D.19-05-042, p. A11.)
- e. PG&E, SCE, and SDG&E must host targeted, localized meetings with emergency services partners to cross-check Public Safety Partner lists at least once per calendar year. These lists compiled by the utilities must include, at a minimum, the following: (1) the names, email addresses, and phone numbers of the contact persons for purposes of proactive power shutoffs for all entities included as public safety partners, including first/emergency responders at the local, state and federal level, water, wastewater and communication service providers, community choice aggregators and publicly-owned utilities/electrical cooperatives, the Commission, the California Governor's Office of Emergency Services and the California Department of Forestry and Fire Protection; and (2) the names, email addresses, and phone numbers of persons responsible for maintaining and updating this list for the utility so public safety partners can easily provide the appropriate utility with updated contact information. All relevant stakeholders should review the list to verify that all public safety partners and the designated contact persons are correctly listed and, if errors or omission exist, contact the utility. These lists may be designated as confidential, to the extent required by law. The utilities must revise these lists immediately upon receipt of updated information from public safety partners. (D.21-06-014, OP 25, pp. 290-291.)

4.2 Critical Facilities and Infrastructure

- a. The electric IOUs must, in addition to developing their own list of critical facilities and critical infrastructure based on the adopted definition, work in coordination with

first/emergency responders and local governments to identify critical facilities within the electric IOUs' service territories. The electric IOUs must identify 24-hour points of contact and, at a minimum, secondary points of contact. The electric IOUs must work together with operators of critical facilities and critical infrastructure to identify preferred points of contact (the billing contact may not be the appropriate PSPS contact) and preferred methods of communication.⁴⁴ (D.19-05-042, p. A11.)

- b. To ensure accuracy of contacts, the electric IOUs are required to update critical facility and critical infrastructure lists annually at least two months in advance of the start of wildfire season. The electric IOUs should work with points of contact to encourage proactive updating of information throughout the year in the event of a change, beyond the annual update required of the utilities. The electric IOUs should prioritize identification of appropriate contacts for critical facilities and infrastructure located within Tier 3 and 2 high fire threat districts, followed by adjacent jurisdictions that may be impacted in the event of de-energization. (D.19-05-042, p. A11-A12.)
- c. The electric IOUs, pursuant to Resolution ESRB-8 and in advance of the wildfire season, must proactively partner with critical facility and critical infrastructure representatives to assess the ability of each critical facility to maintain operations during PSPS events of varying lengths. The electric IOUs must help critical facility and critical infrastructure representatives assess the need for backup generation and determine whether additional equipment is needed, including providing generators to facilities or infrastructure that are not well prepared for a power shut off. Advance education of representatives and preparation of critical facilities and infrastructure is imperative to ensure that public safety is preserved during a PSPS event.⁴⁵ (D.19-05-042, p. A12.)
- d. PG&E, SCE, and SDG&E must convey, in writing, to critical facilities and infrastructure customers whether or not the utility is responsible for providing the backup power (mobile or otherwise) before or during a de-energization to critical facilities and infrastructure and the extent of any responsibilities regarding such backup power. (D.21-06-014, OP 52, p. 299.)
- e. Each electric IOU must create a webpage accessible from its PSPS main page that includes the Commission's definition of critical facilities and infrastructure, the reasons it is important for customers to be designated as such in the event of a PSPS, and the name and contact information, including email address, of the person at the utility responsible for handling inquiries about whether a customer should be designated as critical facilities and infrastructure. (D.21-06-034, p. A3.)
- f. Each electric IOU must provide a critical facilities and infrastructure plan in an annual report filed in R.18-12-005 or successor proceeding, referred to herein as the [current year] Pre-Season Report. This annual plan shall include, at a minimum, the following: (D.21-06-034, p. A3-A4.)
 - (1) a list of critical facilities and infrastructure within the utility's service area (which may be provided on a confidential basis). (D.21-06-034, p. A3-A4.)
 - (2) a description of the methodology the utility uses to identify critical facilities and infrastructure. (D.21-06-034, p. A3-A4.)
 - (3) any changes in the critical facilities and infrastructure identified in the utility service area since the prior annual report. (D.21-06-034, p. A3-A4.)
 - (4) the process used by the utility to maintain and update primary and secondary direct contacts for critical facilities and infrastructure (D.21-06-034, p. A3-A4.)
 - (5) an explanation of how the utility collaborates with transmission-level customers of the utility (as the term transmission-level customer is defined herein) so that the

⁴⁴ Original language in D.19-05-042 refers to "de-energization contact."

⁴⁵ Original language in D.19-05-042 refers to "de-energization events" and "de-energization event."

utility understands the critical facilities and infrastructure within the service territory of those transmission-level customers. (D.21-06-034, p. A3-A4.)

- (6) the number of requests from customers to be designated as critical facilities and infrastructure in the current year and the prior year, whether the utility accepted or denied the request, and the reasons for any denial. (D.21-06-034, p. A3-A4.)
- (7) efforts by the utility to assess backup power needs of critical facilities and infrastructure, provision of backup power by the utility to critical facilities and infrastructure, and the terms under which the utility provided backup power to critical facilities and infrastructure. (D.21-06-034, p. A3-A4.)

SED is authorized to require the utilities to include additional topics in this plan. (D.21-06-034, p. A3-A4.)

- g. PG&E, SCE, and SDG&E must convey, in writing, to critical facilities and infrastructure customers whether or not the utility is responsible for providing the backup power (mobile or otherwise) before or during a de-energization to critical facilities and infrastructure and the extent of any responsibilities regarding such backup power. (D. 21-06-014, OP 52, p. 299.)
- h. PG&E and SCE must immediately initiate plans to develop a program similar to SDG&E's program for assessing, deploying, and providing, to the extent required by law, for the needs of critical facilities and infrastructure customers for backup power during a de-energization, considering the components used by SDG&E identified in this decision. SDG&E must share its backup power program with PG&E and SCE to assist the utilities in further developing their backup power programs. (D.21-06-014, OP 53, p. 299-300.)
- i. Electric IOUs must include lists on their PSPS secure web portal of all critical facilities and infrastructure customers and update these lists on the secure web portal regularly, at least monthly. As part of the process to update these lists, the utility shall consult with local and tribal governments to ensure that the utility and local and tribal governments mutually understand the identity of critical facilities and infrastructure customers in the utility service territory and the safety needs of the critical facilities and infrastructure customers related to PSPS events. Upon request, a utility shall provide access to such lists on its PSPS secure web portal to local and tribal governments, subject to any applicable confidentiality laws. (D.21-06-034, p. A4.)
- j. Within 120 days of the effective date of this decision, PG&E, SCE, and SDG&E must post on their existing PSPS secure web portals, lists that include, at a minimum, the following: (1) the names, email addresses, and phone numbers of the contact persons for purposes of proactive power shutoffs for all entities included as critical facilities and infrastructure customers; and (2) the names, email addresses, and phone numbers of persons responsible for maintaining and updating this list for the utility so critical facilities and infrastructure customers can easily provide the appropriate utility with updated contact information. All relevant stakeholders should review the lists on the utilities' PSPS secure web portals to verify that all critical facilities and infrastructure customers and the designated contact persons are correctly listed and, if errors or omission exist, contact the utility. These lists may be designated as confidential, to the extent required by law. The utilities must revise these lists immediately upon receipt of updated information from critical facilities and infrastructure. (D.21-06-014, OP 28, pp. 291-292.)
- k. PG&E, SCE, and SDG&E must post on their existing PSPS secure web portals, within 120 days of the effective date of decision, lists that include, at a minimum, the following: (1) the names, email addresses, and phone numbers of the 24-hour primary and secondary points of contact for purposes of proactive power shutoffs for all entities included as critical facilities and infrastructure customers; and (2) the names, email addresses, and phone numbers of persons responsible for maintaining and updating this list for the utility so critical facilities and infrastructure customers can easily provide the appropriate utility with updated contact information. All relevant stakeholders should review the list on the

utilities' existing PSPS secure web portals to verify that 24-hour primary and secondary points of contact for all critical facilities and infrastructure are correctly listed and, if errors or omission exist, to contact the utility. These lists may be designated as confidential, to the extent required by law. The utilities must revise these lists immediately upon receipt of updated information from critical facilities and infrastructure customers. (D.21-06-014, OP 31, p. 292-293.)

4.3 Access and Functional Needs Populations

- a. The electric IOUs must make a diligent effort to identify access and functional needs populations within their customer base. The electric IOUs should review available information including, but not limited to, customers on medical baseline, California Alternative Rate for Energy Program and Family Electric Assistance Program tariffs and customers that require in person notification in advance of service disconnection. (footnote 8 in original to: See D.12-03-054.) In advance of the 2019 wildfire season, the electric IOUs should seek to identify and expand registration under their medical baseline tariffs. (D.19-05-042, p. A12-A13.)
- b. In the spirit of shared responsibility, the electric IOUs should endeavor to partner with local governments and agencies to encourage identification of access and functional needs populations through those agencies. Recognizing privacy concerns, the Commission does not require the electric IOUs to develop a comprehensive contact list of access and functional needs customers nor to share individual customer information with local jurisdictions; rather, the Commission encourages that, through local agency partnerships, the electric IOUs and local jurisdictions can together provide up front education and outreach before and communication during a PSPS event in formats appropriate to individual access and functional needs populations. The electric IOUs must also develop a plan for expanding identification of access and functional needs customers beyond those customers enrolled in existing utility programs in the event that local agency partnerships are unavailable to assist. The Commission acknowledges that identification of all access and functional needs customers is a goal that may not be fully achievable even with assistance of local jurisdictions; however, the utilities must take all reasonable steps within the boundaries of the law towards that goal in order to protect the safety of access and functional needs populations.⁴⁶ (D.19-05-042, p. A13.)
- c. The electric IOUs must update contact information for medical baseline customers and provide an opportunity for such customers to select alternative means of contact beyond their preferred means of contact from the utility for billing and other information. (D.19-05-042, p. A13-A14.)
- d. PG&E, SCE, and SDG&E are authorized to share Medical Baseline customers information with county, city, and tribal government emergency response personnel, upon the county, city, or tribal government's request, when a PSPS protocol is initiated. (D.21-06-014, OP 9, p. 287.)
- e. PG&E, SCE, and SDG&E are authorized to share with county, city, or tribal governments, upon the county, city, or tribal government's request, the addresses within their jurisdiction that are or will be impacted by planned or announced PSPS events. (D.21-06-014, OP 10, p. 287.)

4.4 All Customers

The electric IOUs must ensure that customer contacts are up-to-date. The Commission recognizes that electric IOU customer points of contact are necessarily limited, for example a landlord-controlled account will not provide a method of contact for tenants. The electric IOUs must work with local jurisdictions to leverage all means of identifying and communicating with all people within a de-energized area, including people who may be visiting the area or not directly listed on utility accounts. The Commission expects that this will be an iterative process developed over time. (D.19-05-042, p. A14.)

⁴⁶ Original language in D.19-05-042 refers to "de-energization event."

5. Information included in Notice in advance of/immediately before PSPS event

5.1 Outreach and Education – In advance of/immediately before PSPS Event

- a. With the goal of having a common understanding of situational awareness among public safety partners throughout California, each electric IOU must clearly articulate thresholds for strong wind events as well as the conditions that define “an extreme fire hazard” (humidity, fuel dryness, temperature) that the electric IOU evaluates in considering whether to de-energize. This information may vary for different jurisdictions and topographies; however, the information must be provided to and be readily available to public safety partners and the public.⁴⁷ The electric IOUs are afforded discretion to evaluate real-time and on-the-ground information in determining whether to de-energize; adoption of thresholds is not determinative of de-energization. (D.19-05-042, p. A14-A15.)
- b. To aid in preparation, the electric IOUs must provide, if requested, relevant geographic information system data, including identification of critical facilities, circuits, and number of medical baseline customers, to local jurisdictions in advance of wildfire season. In addition, the utilities must provide, if requested, operational coordination with public safety partners to ensure such partners have not only the information but also the coordination with the utilities necessary to prepare for de-energization. (D.19-05-042, p. A15.)
- c. [Note: The compliance date of this directive has passed.] In advance of the 2019 wildfire season, the electric IOUs, jointly, must immediately oversee development and execution of a statewide Public Safety Power Shut-off education campaign, developed in partnership with Cal OES and Cal FIRE, that provides education tailored to the needs of stakeholders, including access and functional needs populations, in order to make citizens aware of how to prepare for and obtain information during a prolonged loss of power, including as a result of de-energization. Education and outreach must use best practices outlined in the California Alert and Warning Guidelines to maximize understanding. The electric IOUs, in coordination with the above-named agencies, must measure effectiveness of education and outreach efforts and adjust efforts accordingly. (D.19-05-042, p. A15.)
- d. The electric IOUs must work with local and state public safety partners to develop scripted PSPS templates that can be used by public safety partners leading up to, during, and after a PSPS event. In order to allow jurisdictions with public alerting authority to send timely and appropriate messages to populations potentially impacted by a PSPS event, the utilities must develop Common Alerting Protocol compliant messages and protocols for use by the designated alert authorities. Whether local jurisdictions choose to utilize their Public Alert and Warning system to notify the public of a PSPS event is at their discretion. The electric IOUs must also work with state public safety partners (Cal OES, Cal FIRE) to develop definitions to use for communications and a standardized nomenclature based on existing emergency frameworks.⁴⁸ (D.19-05-042, p. A15-A16.)

5.2 Notice before PSPS event

- a. The electric IOUs must convey to public safety partners at the time of first notification preceding a PSPS 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. The electric IOUs must use the previously established contact channels developed in advance of the 2019 wildfire season and should strive to provide contact according to the timeframes adopted in these guidelines. The electric IOUs must provide the number of medical baseline customers in the impacted area to first/emergency responders and/or local jurisdictions.⁴⁹ (D.19-05-042, p. A16.)

⁴⁷ For example, on the utility’s website. (D.19-05-042, p. A14, fn. 9.)

⁴⁸ Original language in D.19-05-042 refers to “de-energization templates” and “de-energization event.”

⁴⁹ Original language in D.19-05-042 refers to “de-energization event.”

- b. [Note: The compliance date of this directive has passed.] For the 2019 wildfire season, the electric IOUs must, at the time of first notification preceding a PSPS event, make available a Geographic Information System shapefile via a secure data transfer process depicting the most accurate and specific information possible regarding the boundaries of the area subject to de-energization to all public safety partners whose jurisdictions or service areas will be impacted by the PSPS event, including adjacent jurisdictions or service areas that could lose power as a result of de-energization in a high fire threat district. Going forward, the electric IOUs must work to provide a secure data transfer of the de-energization boundary in Geographic Information System Representational State Transfer Service format (or other agreed upon format that is rapidly consumable by existing geospatial and situational awareness tools) and must also show affected circuits and any other information that is requested by public safety partners and can reasonably be provided by the utility. The utilities must work towards being able to provide real-time data to public safety partners.⁵⁰ (D.19-05-042, p. A16-A17.)
 - c. PG&E and SCE must immediately develop and implement improvements to their protocols to enable the accurate provision to and timely exchange of geospatial information with public safety partners in preparation for an imminent PSPS event and during a PSPS event. (D.21-06-014, OP 17, p. 288.)
 - d. The electric IOUs must partner with local public safety partners to communicate with all other customers that a PSPS event is possible, the estimated start date and time of the PSPS event, the estimated length of the PSPS event, which may be communicated as a range, and the estimated time to power restoration, which again, may be communicated as a range. Communications should state when the customer can next expect communication about the PSPS event. Communication, consistent with best practices articulated in the California Alert and Warning Guidelines must answer five key recipient questions: (1) Who is the source of the warning; (2) What is the threat; (3) Does this affect my location; (4) What should I do; and (5) What is the expected duration of the event. Communications must also point customers towards education and outreach materials disseminated in advance of the 2019 wildfire season.⁵¹ (D.19-05-042, p. A17-A18.)
 - e. The electric IOUs must provide up-to-date information, including a depiction of the boundary of the PSPS event, on their websites' homepage and a dedicated Public Safety Power Shut-off webpage regarding the PSPS event. The electric IOUs, in partnership with local public safety partners, must establish and communicate a 24-hour means of contact that customers may use to ask questions and/or seek information.⁵² (D.19-05-042, p. A18.)
- 6. What Methods Should the Electric Investor-Owned Utilities Use to Communicate a PSPS event with the Public?⁵³**
- a. The California Alert and Warning Guidelines state that “people rarely act on a single warning message alone. To be effective, warnings should be delivered in various formats via various media, both to increase reliability of warning delivery and to provide a sense of corroboration that will encourage recipients to take protective actions.” The electric IOUs must develop notification strategies for all customer groups affected by de-energization, and the electric IOUs must partner with local and state public safety partners, whenever possible, to develop notification strategies. In order to be effective, notifications should be delivered in multiple formats across several media channels, both to increase the potential a message successfully reaches an impacted population and to provide a sense of corroboration that will encourage individuals to take protective actions. Customer notifications should include, but are not limited to, telephonic notification, text message notification, social media advisories, emails, and messages to

⁵⁰ Original language in D.19-05-042 refers to “de-energization event.”

⁵¹ Original language in D.19-05-042 refers to “de-energization event.”

⁵² Original language in D.19-05-042 refers to “de-energization event.”

⁵³ Original language in D.19-05-042 refers to “de-energization event.”

agencies that service disadvantaged communities within an impacted area to allow them to amplify any pertinent warnings. Communication methods must consider the geographic and cultural demographics of affected areas, e.g., some rural areas lack access to broadband services. Communications must also be delivered in English, Spanish, Chinese (including Cantonese, Mandarin and other Chinese languages), Tagalog and Vietnamese as well as Korean and Russian where those languages are prevalent within the utilities' service territories. (D.19-05-042, p. A18-A19.)

- b. The electric IOUs must develop a strategy for how communication will occur with affected customers once de-energization has begun and during re-energization, recognizing that communication channels may be restricted due to the loss of power. The electric IOUs should develop this strategy in coordination with public safety partners. (D.19-05-042, p. A19.)
 - c. PG&E, SCE, and SDG&E must, for a minimum of five years, retain records to substantiate all efforts to develop notification and communication protocols and systems to reach all customers and communication in an understandable manner. This information must be in a format readily accessible to Commission audit, as directed by SED. (D.21-06-014, OP 39, p. 295).
 - d. PG&E, SCE, and SDG&E must, for a minimum of five years, retain records to substantiate all efforts to develop notification strategy that considers, among other things, geographic and cultural demographics. (including a list of all languages used and where used and a list of all local and state public safety partners consulted) in advance of fire season. These records must be in a format readily accessible to Commission audit, as directed by SED. (D.21-06-014, OP 42, p. 296).
 - e. PG&E, SCE, and SDG&E must, for a minimum of five years, retain records to substantiate all efforts to develop and implement, in advance of wildfire season, a communications strategy to rely on during a proactive de-energization when restrictions due to the power loss exist. These records must be in a format readily accessible to Commission audit, as directed by SED (D.21-06-014, OP 44, p. 297).
- 7. Communicating and Coordinating with Public Safety Partners Before and During a PSPS event⁵⁴**
- a. Consistent with the State Emergency Management System, the electric IOUs will be responsible for contacting local public safety officials in impacted jurisdictions prior to and during a PSPS event. The electric IOUs must communicate an impending PSPS event to local and state officials. The electric IOUs must work with public safety partners to disseminate all information in formats and through processes that are used by public safety partners during other emergencies, including developing notification messaging consistent with the California Public Alert and Warning System. The electric IOUs must partner with local and state public safety partners to develop notification strategies for all customer groups that comport with the best practices articulated in the California Statewide Alert and Warning Guidelines.⁵⁵ (D.19-05-042, p. A19-A20.) (D.19-05-042, p. A19 at fn. 10: PacifiCorp, as a utility that operates across state lines, requests that it operate consistent with NIMS. This is allowable; however, if a provision of NIMS conflicts with SEMS, PacifiCorp must follow the provisions mandated in SEMS.)
 - b. PG&E, SCE, and SDG&E must expeditiously (1) integrate, to the fullest extent possible, all aspects of the SEMS framework into their pro-active de-energization protocols and (2) provide training under the SEMS framework, to the fullest extent possible, to all PSPS personnel. (D.21-06-014, OP 15, p. 288.)
 - c. [Note: The compliance date of this directive has passed.] In advance of the 2019 wildfire season, the electric IOUs must continue to partner with local jurisdictions, Cal OES and Cal FIRE to develop a comprehensive, coordinated and cohesive notification framework including, but not limited to, the electric IOUs providing notification to public safety

⁵⁴ Original language in D.19-05-042 refers to “de-energization event.”

⁵⁵ Original language in D.19-05-042 refers to “de-energization event.”

partners and public safety partners, to the extent they are willing and able, providing secondary or supplemental notification to the general public. Electric IOUs retain responsibility to ensure notification of affected customers. (D.19-05-042, p. A20.)

- d. The electric IOUs, in partnership with local and state public safety partners, must develop notification strategies for access and functional needs populations up to and including in-person notification. The electric IOUs should strive to develop a coordinated positive/affirmative notification strategy with public safety partners for pre-designated access and functional needs populations. Pre-designated access and functional needs populations should be determined in coordination with public safety partners, whenever possible, but should include customers on medical baseline tariffs that are dependent upon electricity for the provision of life-sustaining services. (D.19-05-042, p. A20-A21.)
- e. PG&E and SCE must immediately develop and implement improvements to their communications protocol with all emergency responders and local governments so communication before, during, and after a de-energization is seamless. (D.21-06-014, OP 14, p. 288.)
- f. PG&E and SCE must immediately initiate plans to develop a program similar to SDG&E's program to (1) update contact lists for public safety partners on an ongoing basis and (2) conduct, at a minimum, two communications exercises prior to the wildfire season. The program should consider the components used by SDG&E identified herein. SDG&E must share its program to update its list of public safety partners and conduct communication exercises with public safety partners in advance of wildfire season with PG&E and SCE to assist the utilities to improve their programs. (D.21-06-014, OP 58, p. 302.)
- g. PG&E, SCE, and SDG&E must immediately take actions to address any problems or deficiencies identified during a communication exercise with public safety partners so these problems or deficiencies are resolved before the wildfire season. (D.21-06-014, OP 59, p. 302.)

7.1 Coordination with Emergency Operation Centers and Incident Command Systems.

- a. If requested by the local jurisdiction, the electric IOUs must embed a liaison officer at the local emergency operation center. When requested, the utility must also embed a liaison officer at the State Operations Center for the purpose of assessing and integrating wildfire threat data for decision-making. The liaison officers must be empowered to provide rapid and accurate information from the utilities. To ensure consistency of response across jurisdictions, the electric IOUs should have a designated lead with decision-making authority located at the utility's emergency operations center with whom embedded liaisons can communicate in real-time to obtain the most up-to-date information. This requirement does not preclude the utilities from developing a centralized communication structure that is amenable to both the utility and local jurisdictions to provide real-time coordination and situation awareness. (D.19-05-042, p. A21.)
- b. Currently, the electric IOUs form an emergency operation center during each PSPS event. The electric IOUs must invite representatives from Cal OES, water infrastructure providers, and communication service providers. In the alternative, the utilities may develop a mutually agreeable communications structure with water infrastructure providers and communication service providers in lieu of holding seats in its emergency operations center.⁵⁶ (D.19-05-042, p. A21.)
- c. All electric IOU EOC staff must receive annual emergency management training sufficient to enable them to perform their assigned role. Emergency management

⁵⁶ Original language in D.19-05-042 refers to "de-energization event."

expertise is necessary to communicate effectively, accurately, and consistently with public safety partners before, during, and after a PSPS event.⁵⁷ (D.21-06-034, p. A8).

- d. All electric IOU staff must meet with representatives from Cal OES, Cal FIRE, and the Commission to develop uniform, synchronized methods of conducting State Executive Calls and notifications to those agencies. In consultation with representatives from Cal OES, Cal FIRE, and the Commission, electric IOUs must make reasonable efforts to align their statistical updates on PSPS events sent to state and federal executive partners. (D.21-06-034, p. A8)
- e. PG&E, SCE, and SDG&E must adopt protocols to ensure all relevant information is timely transferred when employees in the role of the embedded utility liaison change during an ongoing PSPS event, such as during an employee shift change. (D.21-06-014, OP 22, pp. 289-290.)
- f. PG&E must specifically seek and consider protocols from SCE and SDG&E regarding how to effectively rely on embedded utility liaisons to facilitate the timely and accurate exchange of information during a PSPS event and use any information obtained to improve PG&E's compliance with this guideline. (D.21-06-014, OP 23, p. 290.)

8. Who Should Receive Notice, When Should Notice Occur, and How Should Notice Occur?

- a. The electric IOUs shall utilize all reasonable channels of communication to all populations potentially affected by a PSPS event.⁵⁸ (D.20-05-051, p. A3.)
- b. The electric IOUs shall develop communication and notification plans jointly with CalOES, county and local governments, independent living centers, and representatives of people/communities with access and functional needs. The plans shall anticipate the disruption of traditional communication channels and provide contingency alternatives. (D.20-05-051, p. A3.)
 - (1) Each electric IOU must develop a notification plan jointly with Cal OES, public safety partners, county, tribal, and local governments, independent living centers, paratransit agencies, durable medical equipment vendors, agencies that serve individuals who receive Medi-Cal home and community-based services, and other organizations representative of all subsets of people or communities with access and functional needs. Each electric IOU must specifically describe its plans for notifications according to specific access and functional needs, for instance the needs of persons with vision impairments as distinct from the needs of persons with a developmental disability. Each electric IOU must finalize its notification plan for inclusion in its [current year] Pre-Season Report. (D.21-06-034, p. A11.)
- c. In situations where internet, cellular, or landline-based communication services are limited, the electric IOUs shall coordinate with public safety partners to use in-language public alert systems and public radio broadcasts in PSPS impacted areas.⁵⁹ (D.20-05-051, p. A3.)
- d. Each electric IOU shall ensure there is sufficient bandwidth capacity, either via a cloud service or on-premise, to manage a website that provides public safety partners and the general public with access to information about the geographic areas impacted by potential and active PSPS events and all other critical information to maintain public safety prior to, during, and after a PSPS event. Each electric IOU shall create and

⁵⁷ Original language in D.21-06-034 refers to “proactive de-energization event.”

⁵⁸ Original language in D.20-05-051 refers to “de-energization event.”

⁵⁹ Original language in D.20-05-051 refers to “de-energization impacted areas.”

maintain an actionable plan that ensures necessary bandwidth is immediately available and consistent up to and through a PSPS event. Each electric IOU shall have bandwidth and technological resources available to serve all peak demand that may occur as a result of a PSPS event.⁶⁰ (D.20-05-051, p. A3-A4.)

- e. Each electric IOU shall consult with the California Department of Technology (CDT) to develop a plan (submitted to the CPUC) that outlines steps for meeting future website and server performance requirements necessary for effective and uninterrupted communication to the general public regarding PSPS events.⁶¹ (D.20-05-051, p. A4.)
- f. Each electric IOU shall ensure that the public is able to access precise locality information of potential and active PSPS event impacted service points.⁶² (D.20-05-051, p. A4.)
 - (1) Additionally, each electric IOU shall make every reasonable effort to ensure the public is able to access precise and accurate information regarding the location and duration of potential and active PSPS events and restoration efforts. Each electric IOU shall enumerate and explain the cause of any false communications in its post event reports by citing the sources of changing data. Lessons learned should be incorporated in ongoing PSPS communications and notifications to increase their accuracy and effectiveness. (D.20-05-051, p. A4.)
- g. All notifications to customers regarding potential or active PSPS events shall be communicated with ease of readability and comprehension as a priority. Each electric IOU shall proactively reach out to media and community-based organizations to ensure consistent awareness of and availability to third-parties of all messaging and map data, including application programming interfaces, that is used for PSPS events. The electric IOUs shall retain and utilize the expertise of emergency situation user interface and user experience professionals to ensure planned and executed communication prior to, during, and following a PSPS event minimizes public confusion. Whenever reasonably possible, communications shall be in the language preferred by the customer. Alternative communication formats should be made available for people with disabilities who may not be able to use standard forms of communication.⁶³ (D.20-05-051, pp. A4-A5.)
- h. Each electric IOU shall provide communications carriers with meter and circuit IDs to be de-energized and re-energized in advance of taking action to ensure communication carriers receive actionable notification information that can inform proactive deployment of resources to minimize the impact of the PSPS events on communications infrastructure.⁶⁴ (D.20-05-051, p. A5.)

D. PSPS Post-Event Reporting

- 1. **Reporting Requirements that Resolution ESRB-8 Deems Appropriate to Apply to All Electric IOUs. (Resolution ESRB-8, pp.3-4.)**
 - a. A notification to the Director of SED provided no later than 12 hours after the power shut-off.
 - b. A report to the Director of SED provided no later than 10 business days after the shut-off event ends that includes (i) an explanation of the decision to shut off power; (ii) all factors considered in the decision to shut off power, including wind speed, temperature, humidity, and moisture in the vicinity of the de-energized circuits; (iii) the time, place, and duration of the shut-off event; (iv) the number of affected customers, broken down by residential, medical baseline, commercial/industrial, and other; (v) any wind-related

⁶⁰ Original language in D.20-05-051 refers to “de-energization events” and “de-energization event.”

⁶¹ Original language in D.20-05-051 refers to “de-energization events.”

⁶² Original language in D.20-05-051 refers to “de-energization event” and “de-energization events.”

⁶³ Original language in D.20-05-051 refers to “de-energization events” and “de-energization event.”

⁶⁴ Original language in D.20-05-051 refers to “de-energization events.”

damage to SDG&E's overhead power-line facilities in the areas where power is shut off; (vi) a description of the notice to customers and any other mitigation provided by SDG&E; and (vii) any other matters that SDG&E believes are relevant to the Commission's assessment of the reasonableness of SDG&E's decision to shut off power.

- 1.1. As other electric IOUs shut off power in a similar manner and in similar situations, such notifications are important to allow safety oversight by SED, and it would be appropriate to have these reporting requirements apply to all electric IOUs' PSPS events.⁶⁵ (Resolution ESRB-8, p. 4.)

2. Resolution ESRB-8 Reporting Requirements. (Resolution ESRB-8, p. 5.)

IOUs shall submit a report to the Director of SED within 10 business days after each PSPS event, as well as after high-threat events where the IOU provided notifications to local government, agencies, and customers of possible de-energization though no de-energization occurred. Reports to the Director of SED must include at a minimum the following information:⁶⁶

- a. 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 General Order 95, Rule 21.2-D.
- b. If an IOU is not able to provide customers with notice at least 2 hours prior to the PSPS event, the IOU shall provide an explanation in its report.
- c. The IOU shall summarize the number and nature of complaints received as the result of the PSPS event and include claims that are filed against the IOU because of de-energization.
- d. The IOU shall provide detailed description of the steps it took to restore power.
- e. The IOU shall identify the address of each community assistance location during a PSPS event, describe the location (in a building, a trailer, etc.), describe the assistance available at each location, and give the days and hours that it was open.

- 2.1. PG&E, SCE, and SDG&E must address, among other things, each element of Resolution ESRB-8 reporting requirements, as clarified herein, in the 10-day post-event reports, including the below and, if no information is available, PG&E, SCE, and SDG&E must respond to these Resolution ESRB-8 reporting requirements by indicating the reason this information is not available. PG&E, SCE, and SDG&E must collaborate with the Commission's Safety and Enforcement Division and incorporate Safety and Enforcement Division's input to develop a tracking system for complaints, as defined in this decision, consistent with Safety and Enforcement Division's directives so that Safety and Enforcement Division is able to access this data and confirm the utilities are accurately presenting the number of complaints received regarding PSPS events. As provided for in Resolution ESRB-8, the 10-day post-event reports must also include the following: (D.21-06-014, OP 65, p. 304.)

- a) identify who the utility contacted in the community prior to de-energization and whether the affected areas are classified as High Fire Threat District Tier 1, Tier 2, or Tier 3 (as defined in General Order 95, Rule 21.2-D22);
- b) explain why notice could not be provided at least two hours prior to a de-energization, if such notice was not provided;

identify the number of and a summary of the complaints, meaning any expression of grief, pain, or dissatisfaction, formally filed court claims, and informally or formally

⁶⁵ Original language in Resolution ESRB-8 refers to "de-energization events."

⁶⁶ Original language in Resolution ESRB-8 refers to "de-energization event."

filed Commission complaints received as a result of the PSPS event; provide a detailed description of the steps the utility used to restore power; and

- c) address and describe each community assistance location during a de-energization event.

3. Post-Event Report Requirements and Stakeholder Review

- a. In addition to submitting a report to the Director of SED within 10 business days of power restoration, electric IOUs must serve their PSPS 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 SED. The electric IOUs must actively contact public safety partners involved in the PSPS event to encourage them to provide feedback. The electric IOUs must also send a copy of the report to the lead local/county public safety agency for the PSPS event.⁶⁷ (D.19-05-042, p. A22.)
- b. Within 15 days of the electric IOU serving its post-event report, affected stakeholders, including public safety partners, critical facilities and local residents may serve comments on the electric IOU's post-event report in order to inform SED's compliance review.⁶⁸ Comments must be submitted to the following address: Safety and Enforcement Division Director, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, California, 94102. In addition, comments should be served on the service list of Rulemaking 18-12-005 or its successor proceeding. (D.19-05-042, p. A22.)
- c. In addition to the reporting requirements in Resolution ESRB-8, the electric IOUs must provide the following information:⁶⁹ (D.19-05-042, p. A22-A24; D.21-06-034, p. A15.)
 - (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;
 - (2) A copy of all notifications, the timing of notifications, the methods of notifications and who made the notifications (the utility or local public safety partners);
 - (3) If the utility fails to provide advanced notification or notification according to the minimum timelines set forth in these Guidelines, an explanation of the circumstances that resulted in such failure;
 - (4) A description and evaluation of engagement with local and state public safety partners in providing advanced education and outreach and notification during the PSPS event;
 - (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;
 - (6) A description of how sectionalization, i.e., separating loads within a circuit, was considered and implemented and the extent to which it impacted the size and scope of the PSPS event;

⁶⁷ Original language in D.19-05-042 refers to "de-energization event."

⁶⁸ Previous/original language: "Within 15 days of the electric IOU serving its post-event report, affected stakeholders, including public safety partners, critical facilities and local residents may serve comments on the electric IOU's post-event report in order to inform SED's reasonableness review." Modified by D.21-06-034, p. 24, Conclusion of Law 1 and Ordering Paragraph 1. See D.21-06-034 at pp. 21-24.

⁶⁹ Original language in D.19-05-042 refers to "de-energization event."

Unofficial Compendium PSPS Guidelines and Rules (as of July 5, 2022) by Staff of the California Public Utilities Commission

- (7) An explanation of how the utility determined that the benefit of de-energization outweighed potential public safety risks;
 - (8) The timeline for power restoration (re-energization,) in addition to the steps taken to restore power as required in Resolution ESRB-8;
 - (9) Lessons learned from the PSPS event; and
 - (10) Any recommended updates to the guidelines adopted in Resolution ESRB-8 and this decision.
 - (11) The number of customers notified in comparison to the number of customers de-energized.
- d. PG&E, SCE, and SDG&E must include separate sections in the 10-day post-event reports on the following topics required by D.19-05-042: (1) how the utility used proactive de-energization as a last resort mitigation measure, (2) the alternatives considered, and (3) the mitigation measures employed. (D.21-06-014, OP 5, p. 285).
 - e. PG&E, SCE, and SDG&E must include in the 10-day post-event reports the names of all entities invited to the utility’s emergency operations centers for a PSPS 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, OP 20, p. 289.)
 - f. PG&E, SCE, and SDG&E must clearly document, as required by D.19-05-042,⁷⁰ the extent to which sectionalization was considered and implemented in the 10-day post-event reports and how sectionalization was used to limit the scope of a de-energization. PG&E, SCE, and SDG&E must contact SED if the utility requires additional guidance to ensure adequate reporting on this requirement in the 10-day post-event reports. (D.21-06-014, OP 67, p. 305.)
 - g. PG&E, SCE, and SDG&E must contact SED if the utility requires additional guidance to ensure adequate reporting on the requirement to provide a timeline and steps taken to restore power in the 10-day post-event reports. (D.21-06-014, OP 68, p. 305.)
 - h. The electric IOUs should refer to SDG&E’s November 11-16, 2018 de-energization report, issued on December 4, 2018, as starting a place for reporting format until the Commission provides further guidance on a standard report template. (D.19-05-042, p. A24.)
 - i. In addition to PSPS reports, the electric IOUs are required to submit reports on PSPS lessons learned concurrent with their 2020 Wildfire Mitigation Plans, and thereafter, including an evaluation of utility/public safety partnerships. The reports must include a copy of all educational campaigns and outreach made in advance of the wildfire season and an evaluation of their effectiveness. The Commission may consider these reports in other proceedings; however, existing or successor Wildfire Mitigation Plan proceedings are the appropriate place to file these reports at this time.⁷¹ (D.19-05-042, p. A24.)
 - j. SED should develop a post-PSPS event reporting template. The template, at a minimum, should include the information requested herein; however, SED has the discretion to request additional information. SED should solicit input from stakeholders on the development of the template. The template should be adopted by the Commission via Tier 3 advice letter.⁷² (D.19-05-042, pp. A24-A25.)
 - k. PG&E, SCE, and SDG&E must immediately initiate efforts to assist the Commission’s SED in developing a standardized 10-day post-event reporting template for indicating compliance with all the PSPS guidelines pertaining to notice and, in addition, ensure, in

⁷⁰ D.21-06-014 inadvertently refers to D.19-05-043.

⁷¹ Original language in D.19-05-042 refers to “de-energization reports” and “de-energization lessons learned.”

⁷² Original language in D.19-05-042 refers to “post-de-energization event.”

consultation with SED, that any format used to report compliance with all notice guidelines is readily accessible for analysis by SED. (D.21-06-014, OP 6, p. 285.)

- l. PG&E, SCE, and SDG&E must immediately initiate efforts to assist the Commission’s SED in developing a standardized 10-day post-event reporting template. SED will issue this template for the purpose of receiving comments by parties in R.18-12-005 within 30 days of the effective date of this decision. (D.21-06-014, OP 61, pp. 302-303.)
- m. SED should develop a template for the lessons learned report in advance of the 2020 Wildfire Mitigation Plan submission date. SED should hold workshops to solicit input and facilitate cross-utility and cross-stakeholder learning to inform the development of the reports. The template should be adopted by the Commission via Tier 3 advice letter. (D.19-05-042, p. A24.)
 - (1) SED will continue to review the electric IOUs’ reports pursuant to Resolution ESRB-8. The Commission will consider development of reasonableness criteria in Phase 2 of this rulemaking.
- n. Each electric IOU shall report on all potential or active PSPS events in its post event reports. These reports shall include a thorough and detailed description of the quantitative and qualitative factors it considered in calling, sustaining, or curtailing each PSPS event (including information regarding why the PSPS event was a last resort option) and a specification of the factors that led to the conclusion of the PSPS event.⁷³ (D.20-05-051, p. A9.)
- o. PG&E, SCE, and SDG&E must forgo collection in rates from customers of all authorized revenue requirement equal to estimated unrealized volumetric sales and unrealized revenue resulting from PSPS events after the effective date of this decision. Additionally, PG&E, SCE, and SDG&E must (1) agree on one methodology to rely upon in calculating these estimated unrealized volumetric sales and unrealized revenue, (2) include the amount of estimated unrealized volumetric sales and unrealized revenue resulting from PSPS events in the ERRA proceedings addressing the years in which the PSPS events occurred, (3) detail the method of calculating the amounts of estimated unrealized sales and unrealized revenue in the ERRA proceedings, and (4) report these estimated amounts unrealized sales and unrealized revenue in an annual PSPS report, as directed by the Commission in R.18-12-005. Regarding any submitting this information in any pending ERRA or future ERRA proceeding, the utility shall request via an email to the Administrative Law Judge (and the service list) whether additional testimony is required on this topic and establishes a procedure for submitting this information on an ongoing basis in the ERRA proceeding. The ERRA proceedings, R.18-12-005, or other proceeding may be the appropriate forum to consider further details regarding this directive, such as whether this rate disallowance should be increased to reflect sales, if any, of excess power due to a proactive power shutoff and whether a different methodology or standard methodology should be used by the utilities in calculating this allowance. This directive to forgo collection rates, as detailed herein, shall remain effective until a utility demonstrates improvements in identifying, evaluating, weighing, and reporting public harm when determining whether to initiate a PSPS event. (D.21-06-014, OP 1, pp. 283-284.)
- p. PG&E, SCE, and SDG&E must identify and quantify customer, resident, and the general public risks and harms from a proactive de-energization and clearly explain in the 10-day post-event reports their risk models and 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 a proactive de-energization. PG&E, SCE, and SDG&E must each also explain, in detail, the threshold established for initiating a PSPS event in the 10-day post-event reports. (D.21-06-014, OP 2, p. 284.)
- q. PG&E, SCE, and SDG&E must include a statement in the 10-day post-event reports verifying the availability to public safety partners of (1) accurate and timely geospatial

⁷³ Original language in D.20-05-051 refers to “de-energization events” and “de-energization event.”

Unofficial Compendium PSPS Guidelines and Rules (as of July 5, 2022) by Staff of the California Public Utilities Commission

- information and (2) real time updates to the GIS shapefiles in preparation for an imminent PSPS event and during a PSPS event. (D.21-06-014, OP 18, p. 289.)
- r. PG&E, SCE, and SDG&E must serve, via email, the Commission's SED Director with the 10-day post-event reports and, should a utility require an extension of time to submit the post-event reports, the utility must submit a request for an extension of time in compliance with the Commission's Rules of Practice and Procedure and concurrently serve this request via email on the Commission's SED Director. (D.21-06-014, OP 62, p. 303.)
 - s. PG&E, SCE, and SDG&E must file the 10-day post-event reports in R.18-12-005. Parties must also file their comments in response to the 10-day post-event reports in R.18-12-005 and the public may provide informal comments via the Commission's website (D.21-06-014, OP 63, p. 303.)
 - t. PG&E, SCE, and SDG&E 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 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 report on utility's website in the email; (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; and (4) immediately after service of the 10-day post-event reports, reach out to all affected public safety partners, via email, phone calls, and any other methods, to encourage affected public safety partners to file comments on the report. (D.21-06-014, OP 64, pp. 303-304.)
 - u. PG&E, SCE, and SDG&E must provide the following information on backup power (including mobile backup power) in 10-day post-event reports with the name/email address of a utility contact for customers for each topic: (D.21-06-014, OP 55, p. 300.)
 - (1) a description of the backup generators available for critical facility and infrastructure customers before and during the de-energization,
 - (2) the capacity and estimated maximum duration of operation of the backup generators available for critical facility and infrastructure customers before and during the de-energization,
 - (3) the total number of backup generators provided to critical facility and infrastructure before and during a de-energization,
 - (4) how the utility deployed this backup generation to the critical facility and infrastructure customer's site before or during the de-energization,
 - (5) explain how the utility prioritized the distribution of available backup generation to critical facility and infrastructure customers before and during the de-energization, and
 - (6) identify the critical facility and infrastructure customers that received backup generation before and during the de-energization.
 - v. PG&E, SCE, and SDG&E 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, OP 69, pp. 305-306.)

E. Requests to Delay De-Energization and to Re-energize

1. The electric IOUs should continue to address requests for a de-energization delay on a case-by-case basis. The electric IOUs must only respond to de-energization delay requests from public safety partners. The electric IOUs retain ultimate authority to grant a delay and responsibility to determine how a delay in de-energization impacts public safety. (D.19-05-042, p. A25.)
2. The electric IOUs must work with public safety partners in advance of the wildfire season to develop preliminary plans for addressing emergency situations that may arise during de-energization, such as a non-utility caused wildfire that occurs in a de-energized area that necessitates the use of water for firefighting purposes. Although not a request to delay de-energization, such a situation could result in the public safety being better served by utility lines being re-energized. (D.19-05-042, pp. A25-A26.)

F. De-energization of Transmission Lines

1. [Note: The compliance date of this directive has passed.] The electric IOUs must design interim protocols for the de-energization of transmission lines based upon the impacts to populations across affected jurisdictions including, but not limited to, POU/electric cooperatives, adjacent jurisdictions and small/multi-jurisdictional utilities and critical facilities interconnected at the transmission level. The utility must solicit input from stakeholders in developing these protocols, and the utilities shall serve the interim protocols on the service list of Rulemaking 18-12-005 within three months of issuance of this decision. (D.19-05-042, p. A26.)
2. In the event of transmission line de-energization, additional coordination may be required with Cal OES, Cal FIRE, local jurisdictional public safety partners and the CAISO. The electric IOUs must also provide notice to the CAISO of transmission-level de-energization as far in advance as possible. The electric IOUs must comply with Federal Energy Regulatory Commission and North American Electric Reliability Corporation reliability standards. (D.19-05-042, p. A26.)
 - a. In addition to notifying and coordinating with CAISO, each electric IOU, at a minimum, must provide priority notification to transmission-level customers when considering de-energization of the customers' facilities; the notification must occur, to the extent possible, at least 48-72 hours in advance of the de-energization event. These notifications to transmission-level customers must, to the extent possible, include when the de-energization is expected to start and when re-energization is anticipated to occur. Each electric IOU must also, to the extent possible, provide notification to transmission-level customers within two hours after it has begun surveying de-energized lines. (D.21-06-034, pp. A11-A12.)
3. While the Commission explores development of transmission level notification and communication guidelines, the utilities must employ all relevant notification and communication guidelines adopted herein, in addition to those in Resolution ESRB-8, to the de-energization of transmission lines. (D.19-05-042, pp. A26-A27.)

G. Working Groups and Advisory Boards

1. The large electric IOUs shall convene, at least quarterly, regionalized working groups. The opportunity for participation in these working groups shall include and be extended to small multi-jurisdictional electric utilities, CCAs, publicly owned electric utilities, communications and water service providers, CPUC staff, tribal and local government entities, public safety partners, and representatives of people/communities with access and functional needs and vulnerable communities. The purpose of these working groups is to ensure there is a formal environment to share lessons learned between the impacted communities and the electric IOUs. The large electric IOUs shall refine their PSPS protocols using feedback from the working groups. As a component of this, the large electric IOUs shall conduct outreach to impacted communities to plan the coordination for future PSPS events. Components of the

PSPS protocols that should be addressed by the working groups include the provision of Community Resource Centers, communication strategies, information sharing, identification of critical facilities, strategies for supporting people/communities with access and functional needs, and contingency plans. The large electric IOUs shall report back to the CPUC on progress on a quarterly basis. CPUC participation and the quarterly reporting shall serve as a mechanism for the CPUC to validate whether the electric IOUs have successfully implemented lessons learned from prior PSPS events to refine the process for future PSPS events.⁷⁴ (D.20-05-051, p. A1.)

- a. Pacific Gas and Electric Company's, San Diego Gas & Electric Company's, and Southern California Edison Company's quarterly working group meetings must primarily focus on management of PSPS events and the issues set forth in the Phase 2 and 3 guidelines and rules. The utilities shall also, to the greatest extent possible, share up-to-date information on wildfire mitigation measures they are undertaking that are intended to reduce the scale and/or scope of PSPS events, and to receive input on the risks and harms posed by shutting off the power as well as suggestions for how these risks and harms can be mitigated. The utilities must invite transmission-impacted POUs and electric cooperatives to participate in their regional working groups.⁷⁵ (D.21-06-034, p. A13.)
2. Each electric IOU shall establish advisory boards that provide hands-on, direct advisory functions regarding all aspects of PSPS. These service territory-wide advisory boards should consist of public safety partners, communications and water service providers, local and tribal government officials, business groups, non-profits, representatives of people/communities with access and functional needs and vulnerable communities, and academic organizations. The result of the convening of the advisory boards shall be to develop best practices for PSPS issues and safety, community preparedness, regional coordination and the optimal use of existing and emerging technologies. The electric IOUs shall emulate the approach SDG&E has implemented with its wildfire advisory board.⁷⁶ (D.20-05-051, p. A2.)
3. The electric IOUs may seek approval from the Commission to administer alternatives to the working group or advisory board structures outlined in these guidelines through a Tier 3 advice letter submitted to the Commission. The advice letter must include a detailed explanation of the plan for administering the alternative working group or advisory board function and must include a clear explanation for why the proposed alternative is in the public interest. (D.20-05-051, p. A2.)
4. PG&E, SCE, and SDG&E must immediately implement a collaborative effort, to be referred to as the Joint Utility PSPS Working Group, which includes, at a minimum, a monthly joint utility meeting to share all lessons learned and best practices pertaining to the use of proactive de-energizations as a last resort mitigation measure, alternatives considered, and a robust reporting format to fully inform and assure the public and the Commission that these matters were adequately considered prior to proactively shutting off power. (D.21-06-014, OP 3, p. 284.)
5. PG&E, SCE, and SDG&E must memorialize each meeting of the Joint Utility PSPS Working Group in a joint report that includes, at a minimum, the date/time, attendees, topics discussed, and action items for each utility. PG&E, SCE, and SDG&E must jointly file and serve these reports on or before 14 days after the date of the meeting in R.18-12-005 or a successor proceeding. Reports may be designated as confidential to the extent required by law. The Commission's SED is authorized to require additional topics or further details be included in this report and revised reports shall be filed and served as directed herein. The SED is authorized to establish a filing date of any revised reports. (D.21-06-014, OP 4, pp. 284-285.)

⁷⁴ Original language in D.20-05-051 refers to "de-energization protocols" and "de-energization events."

⁷⁵ Original language in D.21-06-034 refers to "de-energization events."

⁷⁶ Original language in D.20-05-051 refers to "aspects of de-energization" and "de-energization issues."

Unofficial Compendium PSPS Guidelines and Rules (as of July 5, 2022) by Staff of the California Public Utilities Commission

6. PG&E, SCE, and SDG&E must comply with all reporting requirements described herein pertaining to the Joint Utility PSPS Working Group. (D.21-06-014, OP 70, p. 306.)
7. PG&E, SCE, and SDG&E must at the Joint Utility PSPS Working Group:
 - a. share all best practices and lessons learned relevant to development of a consistent format for reporting, in the 10-day post-event report, compliance with all the notice guidelines (both mandatory and discretionary) set forth in the PSPS Guidelines and any other applicable laws, rules, and regulations. 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) the time the utility activated its Emergency Operations Center, the time the utility determined it was likely to de-energize, and the time the utility notified public safety partners; (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. In a report, as designated by the Commission's SED, each utility shall respond to any failure to provide notice consistent with the guidelines with an explanation of what caused these failures and how the utility will correct those failures. (D.21-06-014, OP 7, pp. 285-286.)
 - b. share all aspects of their PSPS webpages with the goal of collaborating on best practices to develop and deploy webpages before, during, and after a proactive de-energization. (D.21-06-014, OP 12, p. 287.)
 - c. share all lessons learned and best practices pertaining to all aspects of their communications practices with public safety partners, including all technology and all notifications, with the goal of collaborating on best practices for communication with public safety partners before, during, and after a proactive de-energization. (D.21-06-014, OP 13, pp. 287-288.)
 - d. share all lessons learned and best practices pertaining to all aspects of their communications practices with emergency responders and local governments, including all technology and all notifications, to achieve the Commission's goal of ensuring the public receives timely notice of proactive de-energizations. (D.21-06-014, OP 16, p. 288.)
 - e. share all lessons learned and best practices pertaining to the exchange of geospatial information with public safety partners in preparation for an imminent PSPS event and during a PSPS event. (D.21-06-014, OP 19, p. 289.)
 - f. share all lessons learned, best practices, and existing protocols related to embedding utility liaisons, upon request, at local and state jurisdictions emergency operations centers during PSPS events. (D.21-06-014, OP 24, p. 290.)
 - g. share all lessons learned and all best practices pertaining to all aspects of developing and maintaining updated lists of public safety partners on PSPS secure web portals. (D. 21-06-014, OP 26, p. 291.)
 - h. share all lessons learned and all best practices pertaining to all aspects of developing and maintaining updated lists of critical facilities and infrastructure customers on PSPS secure web portals. (D. 21-06-014, OP 29, p. 292.)
 - i. share all lessons learned and all best practices pertaining to all aspects of developing and maintaining updated lists of critical facilities and infrastructure customer 24-hour primary/secondary point of contact. (D.21-06-014, OP 32, p. 293.)

- j. share all lessons learned and all best practices pertaining to developing and updating contact information and alternative means of contact regarding PSPS events for all Medical Baseline customers and customers that use electricity to maintain necessary life functions. (D.21-06-014, OP 35, p. 294.)
- k. share all lessons learned and all best practices pertaining to working, in advance of each wildfire season and during each wildfire season, with local jurisdictions, in a proactive manner, to identify and communicate with all people in a de-energized area, including visitors. (D.21-06-014, OP 37, p. 295.)
- l. share all lessons learned and all best practices pertaining to developing notification and communication protocols and systems to reach all customers and communication in an understandable manner. (D.21-06-014, OP 40, pp. 295-296.)
- m. share all lessons learned and all best practices pertaining to developing a notification strategy that considers, among other things, geographic and cultural demographics (including all languages used and where used) in advance of fire season. (D.21-06-014, OP 43, pp. 296-297.)
- n. share all lessons learned and all best practices pertaining to developing and implementing, in advance of wildfire season, a communications strategy to rely on during a proactive de-energization when restrictions due to the power loss exist. (D.21-06-014, OP 45, p. 297.)
- o. share all lessons learned and all best practices pertaining to operational coordination with public safety partners. The Joint Utility PSPS Working Group must also work together to share all the enumerated items noted in the decision and relied upon by SDG&E to promote operational coordination. PG&E and SCE must incorporate these enumerated items into their de-energization protocols, to the greatest extent possible, within six months from the effective date of this decision. PG&E, SCE and SDG&E must file and serve an annual report in R.18-12-005 or a successor proceeding, which identifies, among other things, all methods use to promote operational coordination with public safety partners. Further details of this annual report, including the date to be filed, will be determined in R.18-12-005. (D.21-06-014, OP 47, p. 297.)
- p. share all lessons learned and all best practices pertaining to feedback from public safety partners on how utilities can improve their response to concurrent emergencies. (D.21-06-014, OP 50, p. 299.)
- q. share all lessons learned and all best practices pertaining to all aspects of the backup power program and share all feedback from critical facilities and infrastructure customers on how the utilities are assisting these customers to meet their backup power needs related to de-energizations. (D.21-06-014, OP 54, p. 300.)
- r. share all lessons learned and all best practices pertaining to all aspects of their programs to update lists of public safety partners and conduct communication exercises with public safety partners in advance of wildfire season. (D.21-06-014, OP 60, p. 302.)

H. Public Information, Education and Outreach – Ongoing Basis

- 1. Each electric IOU website shall provide, on a year-round basis, organized, clear, and comprehensive information regarding its efforts to reduce the need for or scope of PSPS events, including, asset and vegetation management, sectionalizing, switching, system hardening, backup power projects, progress on PSPS mitigation efforts, and planned dates of completion. The electric IOUs should not solely provide a link to their wildfire mitigation plans to provide such information. Instead, the electric IOUs should provide a customer friendly portal that easily explains the work it is undertaking to mitigate the need for PSPS events, the progress it has made, and the expected completion of each component of its mitigation strategy. This information should be easily accessible on the electric IOUs'

websites during active PSPS events, and there should be links to specific information available for the customers accessing their webpages.⁷⁷ (D.20-05-051, p. A9.)

2. PG&E, SCE, and SDG&E must maintain updated information on their websites regarding how critical facilities and infrastructure customers may request an assessment of their backup power needs. PG&E, SCE, and SDG&E also must maintain updated information on their websites regarding the availability of mobile backup generation and how critical facilities and infrastructure customers can request the utility to provide mobile backup power. This information must include, at a minimum, an email address to make requests for information and all other relevant information. PG&E, SCE, and SDG&E must promptly respond, within 24 hours, to all inquiries by critical facilities and infrastructure customers concerning backup power for use during a de-energization. (D.21-06-014, OP 56, p. 301.)
3. Beginning in 2021, each electric IOU Wildfire Mitigation Plan shall include specific short, medium, and long-term actions the utility will take to reduce the impact of and need for PSPS events to mitigate wildfire risk. Each electric IOU shall make this information available and easily accessible on its public website.⁷⁸ (D.20-05-051, p. A9-A10.)
4. Each electric IOU must conduct PSPS education and outreach, including surveys, in “prevalent” languages, as defined in D.20-03-004, in its service territory. Each utility must conduct, at a minimum, two PSPS education and outreach surveys accessible to all customers each calendar year. SED is authorized to direct an IOU to modify or issue more of these surveys. Each utility must collaborate with relevant community-based organizations and public safety partners to develop these surveys, which must include, at a minimum, metrics to evaluate whether the education and outreach is effectively helping communities and residents before, during, and after a PSPS event to plan for alternatives electricity arrangements and/or avoid the impacts of PSPS events. Each utility must include the results of the most recent education and outreach surveys not yet previously reported on, as an attachment to the [current year] Pre-Season Report and the [prior year] Post-Season Report. SED is authorized to direct an IOU to file the results of these surveys more frequently or in a different manner.⁷⁹ (D.21-06-034, p. A7.)
5. Each electric IOU must file, as part of the reports required pursuant to D.20-05-051, Conclusion of Law 36 at 96, information pertaining to, at a minimum, discussions at Working Group meetings regarding the accessibility of utility’s education and outreach efforts, including surveys, for individuals with access and functional needs, the recommendations, if any, made by individuals with or representatives of communities with access and functional needs to enhance education and outreach pertaining to PSPS events, and whether those recommendations, if any, were incorporated into the utility’s PSPS protocols. (D.21-06-034, pp. A7-A8.)
6. Each electric IOU must track and report costs for PSPS-related education and outreach, including the required surveys, and SED is authorized to develop the cost tracking system for this purpose. The utilities must include costs incurred by other entities from whom they request assistance in these efforts. The utilities must include these costs, in the format designated by SED, with the [prior year] Post-Season Report. (D.21-06-034, p. A8.)

I. PSPS Exercises

1. The electric IOUs shall coordinate with the CPUC, Cal Fire, Cal OES, communications providers, representatives of people/communities with access and functional needs, and other public safety partners to plan de-energization simulation exercises throughout the utility service territories in the areas with the highest historical and forecasted risk for de-energization in advance of fire season. These simulation exercises should not disrupt electric

⁷⁷ Original language in D.20-05-051 refers to “de-energization events” and “de-energization mitigation efforts.”

⁷⁸ Original language in D.20-05-051 refers to “de-energization events.”

⁷⁹ Original language in D.21-06-034 refers to “de-energization events.”

service nor violate any communication requirements and should consider worst case scenarios of de-energization. These tabletop exercises shall measure de-energization program performance during a simulation event and should include, to the extent possible, tests of customer and critical facilities notification and communication systems, functioning of emergency operations centers, notification protocols, and community resource centers. Lessons learned from these exercises shall be reported to exercise participants, Working Groups and Advisory Boards, and utilized to refine the design and implementation of de-energization program elements. (D.20-05-051, p. A2.)

2. Each electric IOU must conduct PSPS simulation exercises, referred to herein as PSPS exercises, both table-top and functional, for the various events triggered when a utility decides it may de-energize parts of its electrical system to mitigate possible wildfire caused by its infrastructure, in preparation for such a de-energization, during such a de-energization, in preparation for re-energizing, and after the electricity service has been restored. Each utility must coordinate its PSPS exercises with various entities, measure the successes and failures of the PSPS exercises, report lessons learned directly to various groups and participants, and utilize lessons learned to inform improvements in PSPS protocols. Each utility must include as part of a PSPS exercise how utilities intend to reach out to access and functional needs and vulnerable populations in extended power outages. Each utility must conduct, at a minimum, one PSPS exercise with transmission-level customers (as the term transmission-level is defined herein), either as part of a larger PSPS exercise or separately. A component of any PSPS exercises with transmission-level customers must include planning for mutual assistance during PSPS events and incorporate the goal of working together during a PSPS event. These annual PSPS exercises must include components directed at ensuring the utility's PSPS protocols address access and functional needs and vulnerable populations during extended power outages. (D.21-06-034, pp. A4-A5.)
3. Each IOU must prepare and file a PSPS Exercise Report as part of the [current year] Pre-Season Report, and these PSPS Exercise Reports must include, at a minimum, provisions for both table-top and functional PSPS exercises, how many PSPS exercises were held, the dates held, and what entities participated. The Commission's Safety and Enforcement Division is authorized to require additional reporting factors in these PSPS Exercise Reports. (D.21-06-034, p. A5.)
4. Each electric IOU must make reasonable efforts to conduct, at a minimum, a PSPS exercise no later than three months after the effective date of the Phase 3 decision in R.18-12-005. Starting in 2022, each electric investor-owned utility must conduct, at least once annually by July 1, a PSPS exercise using the same channels of decision-making, knowledge transfer, implementation, and communication that would be used in an actual PSPS event. (D.21-06-034, p. A5.)

J. Community Resource Centers

1. [Note: The compliance date of this directive has passed.] Each electric IOU, through collaboration with relevant stakeholders in its service territory, shall finalize a community resource center (CRC) plan, 60 days after issuance of the Phase 2 final decision, based on local demographic data for meeting a variety of safety needs for access and functional needs and vulnerable populations. (D.20-05-051, p. A5.)
2. [Note: The compliance date of this directive has passed.] The CRC plan shall include siting and accessibility of CRC locations and a determination of the resources needed to best serve the community members who visit. This plan shall be created with consultation from regional local government, Advisory Boards, public safety partners, representatives of people/communities with access and functional needs, tribal representatives, senior citizen groups, business owners, community resource organizations, and public health and healthcare providers. (D.20-05-051, p. A5.)

Unofficial Compendium PSPS Guidelines and Rules (as of July 5, 2022) by Staff of the California Public Utilities Commission

3. In advance of fire season, electric IOUs must coordinate and make best efforts to agree with local governments, tribal governments, local offices of emergency management, and public health officials on: (a) the potential sites for CRCs, (b) the services the utility will provide at the CRCs, and (c) where to access electricity during the hours the CRC is closed. Electric IOUs must execute contracts with entities or individuals, including, but not limited to, local or tribal governments, in advance of fire season to ensure that CRCs can be opened quickly. (D.21-06-034, p. A1.)
4. Electric IOUs' CRCs must, at a minimum, provide device charging stations that are capable of powering medical devices, cellular network services, water, chairs, PSPS information representatives, and restrooms.⁸⁰ (D.21-06-034, p. A3.)
5. Where feasible, CRCs should be set up in fixed facility locations that can be quickly opened when needed and provide at least two egress routes. These locations should be in areas known to the public, such as recreational centers, public offices, schools, and libraries. CRC locations shall be ADA (Americans with Disabilities Act) accessible to meet the needs of people/communities with access and functional needs and medical baseline customers. CRC locations shall comply with social distancing or other public health protocols that are in place. (D.20-05-051, pp. A5-A6.)
6. CRCs shall be operable at least 8 AM-10 PM during an active PSPS 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 PM.⁸¹ (D.20-05-051, p. A6.)
7. After considering applicable public health and safety protocols, electric IOUs must implement either indoor, outdoor, or both types of CRCs after taking into consideration, at a minimum, the projected air quality index (AQI), the projected temperatures, and the projected wind speeds. (D.21-06-034, p. A2.)
8. Electric IOUs must each file a CRC plan on an annual basis. The annual CRC plan must detail how the utility will provide the services and supplies required to serve medical baseline and AFN populations as recommended by regional local government, Advisory Boards, public safety partners, representatives of people/communities with access and functional needs, tribal representatives, senior citizen groups, business owners, community resource organizations, and public health and healthcare providers. In the annual CRC Plans, the utilities must set forth the specific recommendations made by the above-noted entities, whether the utilities adopted the recommendation (or did not adopt the recommendation), the reason it was adopted (or not adopted), and the timeline for implementation. (D.21-06-034, pp. A1-A2.)
9. Electric IOUs must include, as part of their CRC Plans, metrics for the prior year regarding CRCs, including, but not limited to, usage metrics and customer feedback, and identify any challenges faced when setting up and providing CRCs. The utilities are directed to work with SED to develop usage metrics that must be included in the CRC Plans. SED is also authorized to require utilities to provide CRC metrics in post-event reports. (D.21-06-034, p. A2.)
10. Electric IOUs must, on an annual basis, update CRC plans (for both fixed facility and mobile locations) for inclusion in the [current year] Pre-Season Report. (D.21-06-034, p. A1.)
11. Electric IOUs must make comprehensive CRC information, including potential or actual locations, publicly available and accessible with searchable functions, on a de-energization webpage in advance of fire season. 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

⁸⁰ Previous guidance: "CRCs should, at a minimum, provide device charging stations that are capable of powering medical devices, cellular network services, water, chairs, PSPS information representatives, and restrooms." (D.20-05-051, p. A6.)

⁸¹ Original language in D.20-05-051 refers to "de-energization event."

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. This notice must be provided in all available means, including, but not limited to, text messages and on the utilities' websites. Notice must conform with the required language and accessibility requirements for notices, in general, for PSPS events, as set forth in these guidelines and rules. The utilities must make the actual locations of CRCs accessible by customers through a searchable function on their websites. (D.21-06-034, p. A2.)

K. Restoration of Power Service upon Conclusion of Public Safety Need for De-energization

1. Each electric IOU shall ensure that electric service to impacted service points is restored as soon as possible and within 24 hours from the termination of the PSPS event, unless it is unsafe to do so. Electric service shall be restored only after facilities have been inspected and the utility has determined that service can be restored safely. For any circuits that require more than 24 hours to restore, the utility shall explain why it was unable to restore each circuit within this timeframe in its post event report.⁸² (D.20-05-051, p. A6.)
2. To the extent possible, within one hour of an electric IOU knowing it will re-energize a line, it shall inform public safety partners and operators of critical facilities and critical infrastructure first, and immediately thereafter, the impacted utility customers. If unintended circumstances are encountered within this timeframe that prevent a safe re-energization, the electric IOU shall promptly notify the relevant stakeholders and affected population and provide an updated re-energization timeframe. (D.20-05-051, pp. A6-A7.)

L. Transportation, Communications, and Water System Resilience

1. Each electric IOU shall coordinate with local, tribal, Federal and State government agencies, and other private and public sector parties to identify transportation, communications, and water system infrastructure throughout its service territory in need of back-up generation. Each electric IOU shall prioritize infrastructure located in areas prone to PSPS events. The electric IOUs shall work with those governing bodies of the critical infrastructure to provide consultative assistance regarding backup generation to ensure critical infrastructure is not brought offline during a PSPS event.⁸³ (D.20-05-051, p. A7.)
2. [Note: The compliance date of this directive has passed.] By the 2021 wildfire season, each electric IOU shall implement pilot projects to investigate the feasibility of mobile and deployable electric vehicle (EV) Level 3 fast charging for areas affected by PSPS events. Each pilot project shall be limited to \$4 million, with a maximum of \$10 million per IOU.⁸⁴ (D.20-05-051, p. A7.)
3. [Note: The compliance date of this directive has passed.] The electric IOUs shall each design a plan, 60 days after issuance of the Phase 2 final decision, in coordination with EV charging network providers, to reinforce EV charging networks and key charging locations with backup generation. (D.20-05-051, p. A7.)
4. Each electric IOU shall coordinate with EV network information providers to communicate (on both the utility website and mobile apps), to the extent possible, current location, number, and accessibility of all Level 3 and Level 2 charging stations in proximity to areas potentially impacted by PSPS events prior to and during potential or active PSPS events.⁸⁵ (D.20-05-051, pp. A7-A8.)

M. Medical Baseline and Access and Functional Needs Populations.

1. Each electric IOU shall identify, above and beyond those in the medical baseline population, households that self-identify to receive an in-person visit prior to disconnection for

⁸² Original language in D.20-05-051 refers to “de-energization event.”

⁸³ Original language in D.20-05-051 refers to “de-energization events” and “de-energization event.”

⁸⁴ Original language in D.20-05-051 refers to “de-energization events.”

⁸⁵ Original language in D.20-05-051 refers to “de-energization events.”

- nonpayment or receive utility communications in a non-standard format or self-identify as having a person with a disability in the household, to help provide support for those with medical needs during a PSPS event.⁸⁶ (D.20-05-051, p. A8.)
- a. The following groups must be included in each electric investor- owned utility’s identification efforts, in addition to the existing requirement for each such utility to “identify, above and beyond those in the medical baseline population”:
 - Persons reliant on electricity to maintain necessary life functions, including for durable medical equipment and assistive technology; and persons eligible for the medical baseline program. (D.21-06-034, pp. A8-A9.)
 2. Each electric IOU shall work in collaboration with public safety partners, local governments, and representatives of people/communities with access and functional needs to identify assistance (including evacuation plans) required by current and potentially eligible medical baseline customers during PSPS events.⁸⁷ (D.20-05-051, p. A8.)
 - a. Each electric IOU must build partnerships with CBOs and healthcare providers, including but not limited to, those from county-level health and human services departments, public health departments, healthcare facilities, and clinics, including those serving customers in one or multiple prevalent language, to minimize the impact of PSPS events, and to improve outreach and assistance for people/communities with access and functional needs and vulnerable populations. As part of these outreach efforts, each electric IOU must offer individuals the option to receive notifications regardless of whether they are an account holder.⁸⁸ (D.21-06-034, p. A9.)
 3. Each electric IOU shall provide a plan to the Commission by June 1, 2020 and thereafter by January 31 of each following year regarding its planned efforts to address people/communities with access and functional needs during PSPS events.⁸⁹ (D.20-05-051, p. A8.)
 4. The electric IOUs shall provide the Commission with quarterly updates regarding the progress towards meeting the established plans and the impact of its efforts to address this population during PSPS events.⁹⁰ (D.20-05-051, p. A8.)
 - a. Each electric IOU’s annual Access and Functional Needs plans and quarterly updates must incorporate, at minimum, the six steps outlined in the Federal Emergency Management Administration’s Comprehensive Preparedness Guide, i.e., forming a collaborative planning team, understanding the situation, determining goals and objectives, developing the plan, plan preparation and approval, and plan implementation and maintenance. As part of forming a collaborative planning team, utility representatives at the Senior Vice President level, or with comparable decision-making power over development and implementation of the Access and Functional Needs plans, must meet at least quarterly with representatives of state agencies and community-based organizations that serve and/or advocate on behalf of persons with access and functional needs. The purpose of these meetings will be to develop, implement, and review each IOU’s annual Access and Functional Needs plans in accordance with the Comprehensive Preparedness Guide. (D.21-06-034, p. A10.)
 5. In relation to PSPS events, each electric IOU shall provide medical baseline and critical facility customer information to local and tribal governments, upon request by those governments and tribes, on a confidential basis and for the sole purpose of protecting the safety and welfare of those customers. The electric IOU providing the information shall notify those local and tribal governments of any specific information that is confidential. The

⁸⁶ Original language in D.20-05-051 refers to “de-energization event.”

⁸⁷ Original language in D.20-05-051 refers to “de-energization events.”

⁸⁸ Original language in D.21-06-034 refers to “proactive de-energization events.”

⁸⁹ Original language in D.20-05-051 refers to “de-energization events.”

⁹⁰ Original language in D.20-05-051 refers to “de-energization events.”

electric IOUs may state that the information is being provided pursuant to a CPUC Order.⁹¹ (D.20-05-051, pp. A8-A9.)

6. Each electric IOU must work with local and tribal governments, state agencies and CBOs in areas they anticipate may be subject to pro-active de-energization to conduct outreach to multi-family building account holders, building managers, and tenants with an overall objective of ensuring that tenants who rely on elevators to access or leave their residence will receive PSPS notifications; outreach to building managers must include providing information about programs that offer resiliency support. (D.21-06-034, p. A9.)
 - a. Each electric IOU must contact the account holder and must make reasonable efforts to contact the building manager of the building(s) identified herein in preparation for wildfire season to ensure such facilities: 1) have forewarning, and 2) provide details about backup generation resource options. Each utility must additionally notify these multi-family building account holders, and make reasonable efforts to notify building managers, prior to conducting a PSPS event.⁹² (D.21-06-034, p. A9.)
7. Each electric IOU must provide proactive notification and impacted zip code information to paratransit agencies that may serve all the known transit- or paratransit-dependent persons that may need access to a community resource center during a PSPS event.⁹³ (D.21-06-034, pp. A9-A10.)
8. Each electric IOU must administer a program to support resiliency for customers that rely on electricity to maintain necessary life functions, including for durable medical equipment and assistive technology, by consulting with and offering them adequate and appropriate support and services in preparation for and during the anticipated duration of a PSPS event, and ensuring customers can use medical equipment for the duration of a PSPS event. Such support and services for each customer may include, for example, free backup batteries that energize such equipment, transportation to a community resource center or other location of the customer's choosing, other forms of support identified in consultation with these customers, and any combination thereof. Each utility's program must include, at minimum, each of the aforementioned forms of support and services. Utilities are not required to include a process for enrollment in their programs. Utilities are also encouraged to share information about where and how to access critical information and support during a PSPS event. (D.21-06-034, p. A10.)
9. PG&E, SCE, and SDG&E must, for a minimum of five years, retain records of their efforts in advance of each wildfire season to: (1) contact Medical Baseline customers, at least annually, to update contact information; (2) seek an alternative means of contact from Medical Baseline customers for Public Safety Power Shutoff events; (3) contact all customers that use electricity to maintain necessary life functions, at least annually, to update contact information; (4) seek an alternative means of contact from these customers for PSPS events; and (5) substantiate all efforts to work in advance of each wildfire season and during each wildfire season with local jurisdictions, in a proactive manner, to identify and communicate with all people in a de-energized area, including visitors. This documentation must be in a format readily accessible to Commission audit, as directed by the Commission's Safety and Enforcement Division. (D.21-06-014, OP 34, pp. 293-294.)

N. Other Reporting

10. All reporting plans concurrently required to be included in the [current year] Pre-Season Report herein, must be produced in a single document submitted by each electric IOU. (D.21-06-034, p. A14.)

Specifically, these include the community resource center plan (A.1, A.3, and A.6), critical facilities plan (B.2), PSPS exercise reports (C.2), education and outreach-related surveys and

⁹¹ Original language in D.20-05-051 refers to "de-energization events."

⁹² Original language in D.21-06-034 refers to "proactive de-energization event"

⁹³ Original language in D.21-06-034 refers to "proactive de-energization event."

Unofficial Compendium PSPS Guidelines and Rules (as of July 5, 2022) by Staff of the California Public Utilities Commission

accessibility efforts and associated costs (E.1, E.2 and E.3), and notification plans (I.3). The [current year] Pre-Season Report must also include the following items of information:

- b. Description of lessons learned from past PSPS events, including feedback from impacted customers and stakeholders, and how the electric IOU has applied such lessons to its current and future efforts in preparation for the upcoming wildfire season.
- c. Identify circuits at greatest risk of de-energization during the upcoming wildfire season. Include the number of times each circuit was de-energized during the prior four calendar years, and describe all steps toward risk reduction and de-energization mitigation for each circuit, including specific outreach and education efforts and efforts to identify and provide appropriate resiliency support to customers with access and functional needs on each circuit.
- d. Annual reports, as applicable, required by Ordering Paragraphs 8, 21, 27, 30, 33, 36, 38, 41, 46, 47, 51, and 57 of D.21-06-014.

PG&E, SCE, and SDG&E must file and serve an annual report in R.18-12-005 or a successor proceeding, which shall identify, among other things, the dates/times when the Joint Utility PSPS Working Group convened and the webpage links to all meeting reports filed with the Commission. The details of the annual report, including the date to be filed, will be determined in R.18-12-005. (D.21-06-014, OP 8, pp. 286-287.)

PG&E, SCE, and SDG&E must file and serve an annual report, with the details of this annual report to be determined in R.18-12-005. This annual report must include the names of all critical facilities and infrastructure customers that the utility contacted to assess backup power needs and the date of that contact. (D.21-06-014, OP 21, p. 289.)

PG&E, SCE, and SDG&E must file and serve an annual report in R.18-12-005 or a successor proceeding, which must identify, among other things, the status of the lists of public safety partners, including the last date updated, on their PSPS webpages. Further details of this annual report, including the date to be filed, will be determined in R.18-12-005. (D.21-06-014, OP 27, p. 291.)

PG&E, SCE, and SDG&E must file and serve an annual report in R.18-12-005 or a successor proceeding, which must identify, among other things, the status of the lists of critical facilities and infrastructure customers, including the last date updated, on their PSPS webpages. Further details of this annual report, including the date to be filed, will be determined in R.18-12-005. (D.21-06-014, OP 30, p. 292.)

PG&E, SCE, and SDG&E must file and serve an annual report in R.18-12-005 or a successor proceeding, which identifies, among other things, the status of their lists, including the last date updated, of 24-hour primary and secondary points of contact for critical facilities and infrastructure customers. Further details of this annual report, including the date to be filed, will be determined in R.18-12-005. (D.21-06-014, OP 33, p. 293.)

PG&E, SCE, and SDG&E must file and serve an annual report in R.18-12-005 or a successor proceeding, which confirms, among other things, that the utility (1) contacted its Medical Baseline customers, at least annually, to update contact information; (2) sought to obtain from Medical Baseline customers, at least annually, an alternative means of contact for PSPS events; (3) contacted all customers that use electricity to maintain necessary life functions, at least annually, to update contact information; and (4) sought to obtain from these customers that use electricity to maintain necessary life functions, at least annually, an alternative means of contact for PSPS events. Further details of the annual report, including the date to be filed, will be determined in R.18-12-005. (D.21-06-014, OP 36, pp. 294-295.)

PG&E, SCE, and SDG&E must file and serve an annual report in R.18-12-005 or successor proceeding, which confirms, among other things, they worked, in advance of each wildfire season and during each wildfire season, with local jurisdictions, in a proactive manner, to identify and communicate with all people in a de-energized area, including visitors. Further

details of this annual report, including the date to be filed, will be determined in R.18-12-005. (D.21-06-014, OP 38, p. 295.)

PG&E, SCE, and SDG&E must file and serve an annual report in R.18-12-005 or successor proceeding, which includes a detailed summary of efforts to develop, in advance of wildfire season, notification and communication protocols and systems to reach all customers and communicate in an understandable manner. This detailed summary must include, at a minimum, an explanation of the actions taken by the utility to ensure customers understand (1) the purpose of proactive de-energizations, (2) the process relied upon by the utility for initiating a PSPS event, (3) how to manage safely through a PSPS event, and (4) the impacts on customers if a proactive power shutoff is deployed by the utility. Further details of this annual report, including the date to be filed, will be determined in R.18-12-005. (D.21-06-014, OP 41, p. 296.)

PG&E, SCE, and SDG&E must file and serve an annual report in R.18-12-005 or successor proceeding, which includes a detailed summary to substantiate all efforts to develop and implement, in advance of wildfire season, a communications strategy to rely on during a proactive de-energization when restrictions due to the power loss exist. This detailed summary must address how the utility worked in coordination with public safety partners to develop this communication strategy. Further details of this annual report, including the date to be filed, will be determined in R.18-12-005. (D.21-06-014, OP 46, p. 297.)

PG&E, SCE, and SDG&E must at the Joint Utility PSPS Working Group share all lessons learned and all best practices pertaining to operational coordination with public safety partners. The Joint Utility PSPS Working Group must also work together to share all the enumerated items noted in the decision and relied upon by SDG&E to promote operational coordination. PG&E and SCE must incorporate these enumerated items into their de-energization protocols, to the greatest extent possible, within six months from the effective date of this decision. PG&E, SCE and SDG&E must file and serve an annual report in R.18-12-005 or a successor proceeding, which identifies, among other things, all methods use to promote operational coordination with public safety partners. Further details of this annual report, including the date to be filed, will be determined in R.18-12-005. (D.21-06-014, OP 47, p. 297.)

PG&E, SCE, and SDG&E must file and serve an annual report in R.18-12-005 or a successor proceeding, which identifies, among other things, all methods use to promote operational coordination with public safety partners. Further details of this annual report, including the date to be filed, will be determined in R.18-12-005. (D.21-06-014, OP 47, p. 298.)

PG&E, SCE, and SDG&E must file and serve an annual report in R.18-12-005 or a successor proceeding, which identifies, among other things, all methods used to work with public safety partners to improve responses to concurrent emergencies. Further details of this annual report, including the date to be filed, will be determined in R.18-12-005. (D.21-06-014, OP 51, p. 299.)

PG&E, SCE, and SDG&E must file and serve an annual report in R.18-12-005 or a successor proceeding, which identifies, among other things (1) actions taken to assess the overall backup power needs of critical facilities and infrastructure customers in advance of wildfire season, (2) the names of the critical facilities and infrastructure customers the utility engaged to assess backup power needs, the results of the utility assessment, and whether or not the critical facilities and infrastructure customer provided any needed backup power generation, and (3) actions taken to develop, implement, and improve utility partnerships with critical facilities and infrastructure customers on ongoing or evolving backup power needs. This customer information may be provided on a confidential basis, to the extent required by law. Further details of this annual report, including the date to be filed, will be determined in R.18-12-005. (D.21-06-014, OP 57, p. 301.)

Each electric IOU must file and serve its [current year] Pre-Season Report no later than July 1 of each year in R.18-12-005 or its successor proceeding. The report must follow a template provided by SED no later than 60 days after SED posts a [current year] Pre-Season Report

template on the Commission’s website. Parties may file comments on these reports within 20 days after they are filed, and reply comments within 10 days after the final date to file comments. (D.21-06-034, p. A14.)

11. Each electric IOU must file a comprehensive [prior year] Post-Season Report, no later than March 1 of each year, in R.18-12-005 or its successor proceeding. The report must follow a template provided by SED no later than 60 days after SED posts a [prior year] Post-Season Report template on the Commission’s website. Parties may file comments on these reports within 20 days after they are filed, and reply comments within 10 days after the final date to file comments. (D.21-06-034, pp. A15-A17.)

The [prior year] Post-Season Report must include, but will not be limited to:

- a. For each PSPS event that occurred during the prior calendar year:⁹⁴
 - (1) Circuit-by-circuit analysis of mitigation provided from backup power and microgrid pilots
 - (2) Total number of customer accounts de-energized and median and maximum amount of time de-energized, total number of non-CARE/FERA customer accounts de-energized and median and maximum amount of time de-energized, total number of CARE/FERA customer accounts de-energized and median and maximum amount of time de-energized, total number of Medical Baseline customer accounts de-energized and median and maximum amount of time de-energized, and total number of customers who self-identified for advance notification (i.e., regardless of whether they are the account holder) that were de-energized and median and maximum amount of time deenergized, all by census tract.
- b. Description of the impact of de-energization on transmission, and evaluation of how to mitigate and prepare for those impacts in future potential PSPS events. Identify and describe all studies that are part of such analysis and evaluation, and all efforts to work with publicly owned utilities and cooperatives to evaluate the impacts of de-energization on transmission;⁹⁵
- c. Identification of all requests for selective re-energization made by public safety partners during a PSPS event, whether each such request was granted or denied, and the reason for granting or denying each such request;⁹⁶
- d. Detailed description of all programs and/or types of assistance, including free and/or subsidized backup batteries, the Self-Generation Incentive Program Equity Resiliency Budget, Community Microgrid Incentive Program, hotel vouchers, transportation to CRCs, and any other applicable programs or pilots to support resiliency for persons with access and functional needs and vulnerable populations. Identify and describe the costs and associated funding source(s) for all partnerships, each unique program and form of assistance (e.g., backup batteries as distinct from hotel vouchers), and any other efforts aimed at mitigating the impacts of PSPS events on persons with access and functional needs and vulnerable populations. Funding source(s) shall specify applicable utility balancing accounts or other accounting mechanisms, and non-utility funding sources, if applicable. Identify any communities or areas not served by utility partnerships with CBOs that provide assistance to persons with access and functional needs or vulnerable populations in preparation for or during a PSPS event;
- e. Geospatial data (i.e., a shapefile or geodatabase) by census tract comprising 1) maximum number of PSPS events impacting any customer account in each month, 2) maximum number of hours that any customer account was de-energized in each month, 3) minimum number of hours that any impacted customer account was de-energized in each month, 4) median number of hours that all impacted customer accounts were deenergized in each month, 5) total number of customer accounts and total number of hours (summed among

⁹⁴ Original language in D.21-06-034 refers to “proactive de-energization event.”

⁹⁵ Original language in D.21-06-034 refers to “de-energization events.”

⁹⁶ Original language in D.21-06-034 refers to “de-energization event.”

all these customer accounts) de-energized in each month, 6) total number of CARE/FERA customer accounts and total number of hours (summed among all these customer accounts) de-energized in each month, 7) total number of Medical Baseline customer accounts and total number of hours (summed among all these customer accounts) de-energized in each month, 8) total number of customers who self-identified for advance notification (i.e., regardless of whether they are the account holder) and total number of hours (summed among all these customer accounts) de-energized in each month. This file need not include columns for months during which no PSPS event impacted any customer account;⁹⁷

- f. Annual report, as applicable, required by Ordering Paragraph 66 of D.21-06-014.

PG&E, SCE, and SDG&E must provide aggregate data, as identified above, in an annual report, including aggregate data that may not have been available at the time the utility filed the 10-day post-event report and must contact the Commission's Safety and Enforcement Division if the utility requires additional guidance to ensure adequate reporting on the requirement to provide information on affected customers in the 10-day post-event reports. Further details of this annual report, including the date to be filed, will be determined in Rulemaking 18-12-005. (D.21-06-014, OP 66, p. 305.)

To the extent a required item of information is also required to be included in the electric IOU's Wildfire Mitigation Plan, the [prior year] Post-Season Report may refer to the electric IOU's Wildfire Mitigation Plan rather than repeat the same information; such reference must specify, at minimum, the page and line number(s) for where the required information is contained within the electric IOU's Wildfire Mitigation Plan. In cases where this reference is to data, a summary table of the data shall be provided in the report. (D.21-06-034, p. A17.)

3. Each electric IOU must file and serve its annual Access and Functional Needs plan and quarterly updates. (D.21-06-034, pp. A17-A20.)
- a. Each utility's annual Access and Functional Needs plan must incorporate the six steps of the Comprehensive Preparedness Guide, and must include:⁹⁸
- (1) Survey results and metrics, covering the prior calendar year, that indicate the extent of progress toward the goals or objectives agreed to as part of the requirements articulated in guideline/rule G.5. Until such goals or objectives are established, the utilities must report specifically on the following:
 - a) The percentage of customers with access and functional needs who were aware that their utility may de-energize their system as a wildfire mitigation measure; the percentage of customers with access and functional needs that were aware of what support and resources were available to them during de-energization; and reasons why specific customers or customer segments were not aware. To the extent possible and consistent with protecting customer privacy, the electric IOUs must track and report survey results according to specific access or functional needs, for instance the reasons why persons with a vision impairment were not aware as distinct from reasons why persons with a developmental disability were not aware.
 - b) The percentage of customers with access and functional needs who confirm they received notifications of a possible PSPS event; and reasons why specific customers or customer segments did not confirm they received notification (irrespective of whether the utility provided them notification); and customer feedback regarding how to provide notifications more effectively (i.e., in a manner that meets customers' specific needs). To the extent possible and consistent with protecting customer privacy, the electric IOUs must track and report survey results according to specific access or functional needs, for

⁹⁷ Original language in D.21-06-034 refers to "de-energization events" and "de-energization event."

⁹⁸ Original language in D.21-06-034 refers to "de-energization event."

instance the reasons why persons with a vision impairment did not receive notification as distinct from the reasons why persons with a developmental disability did not receive notification.

- c) The percentage of customers who rely on electric equipment to maintain necessary life functions and who were able to utilize such equipment, or were otherwise able to maintain necessary life functions, for the duration of any PSPS event that affected them; and reasons why specific customers were not able to utilize such equipment for the duration of any PSPS event that affected them. The electric IOUs must extend an invitation to customers who received free backup batteries or other resiliency support items or services (e.g., hotel vouchers, transport to and services provided at CRCs) to participate in a survey, to assess the extent to which such items or support met their needs for the duration of any PSPS event that affected them.
- (2) A summary of the most recent quarterly meeting required by guideline/rule G.5, including names of all participants, the group(s) they represent, and their job titles; action items or other agreed upon next steps for achieving higher-level outcomes and/or pursuing larger strategies, including the responsible person(s) for executing each item and a target date or timeframe for execution of each item.
 - (3) Specific goals or targets with respect to awareness among the various segments of persons with access and functional needs about PSPS events, awareness of where and how to access critical information and support in preparation for and during PSPS events, and the extent to which they are able to maintain necessary life functions throughout the duration of a PSPS event.
 - (4) Data on participation in each program and/or utilization of each type of assistance, including free and/or subsidized backup batteries, the Self-Generation Incentive Program Equity Resiliency Budget, Community Microgrid Incentive Program, hotel vouchers, transportation to CRCs, and any other applicable programs or pilots to support resiliency for persons with access and functional needs and vulnerable populations, by census tract.
- b. Each utility's quarterly Access and Functional Needs plan update must include, at minimum:
 - (1) A summary of the most recent quarterly meeting required by guideline/rule G.5, including names of all participants, the group(s) they represent, and their job titles; action items or other agreed upon next steps for achieving higher-level outcomes and/or pursuing larger strategies, including the responsible person(s) for executing each item and a target date or timeframe for execution of each item.
 - (2) Update on progress toward specific goals or targets identified in the most recent Annual Access and Functional Needs plan.
4. Each electric IOU must file and serve its quarterly regional working group reports in R.18-12-005 or its successor proceeding. (D.21-06-034, p. A20.)
 5. [Note: The compliance date of this directive has passed.] PG&E, SCE, and SDG&E each must, within 90 days of the effective date of this decision, engage, at a minimum three times, with (1) fire agencies and public safety partners located in their service territories in High Fire Risk Districts Tier 2 and 3 and work on plans to address the possibility of emergencies, including fires, arising during a proactive de-energization. (D.21-06-014, OP 48, p. 298.)
 6. [Note: The compliance date of this directive has passed.] PG&E, SCE, and SDG&E each must, within 30 days following the 90-day periods referred to above, file and serve reports in R.18-12-005 describing the engagement with fire agencies and public safety partners in their

Unofficial Compendium PSPS Guidelines and Rules (as of July 5, 2022) by Staff of the California Public Utilities Commission

service territories in High Fire Risk Districts Tier 2 and 3, including the date/time of all meetings, attendees, topics discussed, and action items. (D. 21-06-014, OP 49, pp. 298-299.)

Appendix: Table of Current Reporting Requirements

Reporting Requirement	IOU	Report Interval and/or Due Date	Citation
PSPS Post-Event Reports	All	Within 10 business days after each PSPS event	Resolution ESRB-8 D.19-05-042, p. A22-A24 D.21-06-034, p. A15
Working Group Reports	All	Quarterly	D.20-05-051, p. A1 D.20-06-034, p. A20
Access and Functional Needs (AFN) Plan	All	Annual, by January 31	D.20-05-051, p. A8
AFN Plan Quarterly Update	All	Quarterly, by April 30, July 31, October 31	D.20-05-051, p. A8 D.20-06-034, p. A17-A20
Pre-Season Report	All	Annual, by July 1	D.21-06-034, p. A14-A15
Post-Season Report	All	Annual, by March 31	D.21-06-034, p. A15-A17
Joint IOU PSPS Working Group Report	PG&E, SCE, SDG&E	14 days after each meeting	D.21-06-014, Ordering Paragraph 4

(End of Attachment)