



# PG&E Safety Reporting Mobile App Pilot Workshop 2

A.19-07-019



**Jeremy Battis**

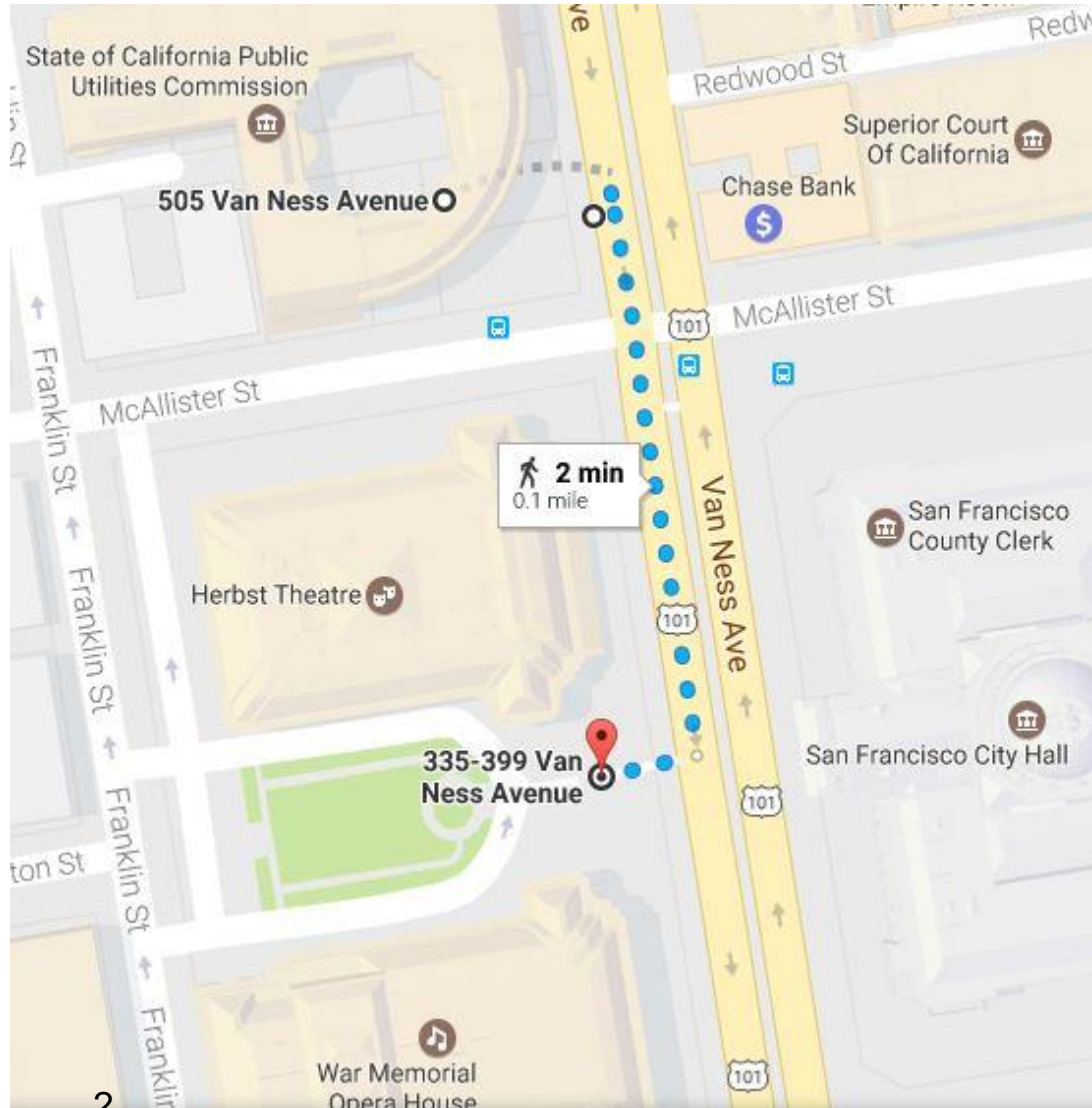
*Safety Advisory, CPUC Safety Policy Division*

CPUC Auditorium | San Francisco

February 12, 2020



# Safety and Emergency Information



- In the event of an emergency, please proceed calmly out the exits
- The Temporary Evacuation Meeting point is located in the public plaza area on Van Ness Avenue opposite City Hall and between the Herbst Theatre and War Memorial Building Opera Plaza



# Agenda - Workshop 2

- 10:00 - 10:20 a.m. Introduction, Safety Message, and Rulemaking Overview and Steps Ahead**  
Jeremy Battis, SPD Safety Advisory, lead analyst for A.19-07-019
- 10:20 - 10:40 a.m. PG&E Presentation of Proposed Mobile App Pilot Implementation Plan**  
Matthew Plumber, PG&E Regulatory Affairs, Principal
- 10:40 - 11:00 a.m. Go Big to Connect Public Information to Analysis and Action to Protect Public Safety**  
Catherine Sandoval, Associate Professor, Santa Clara University School of Law
- 11:00 - 11:30 a.m. Adequacy of the Technical Elements and Requested Deviations in the Proposed Mobile App Pilot**  
Scott Gregory, State Chief Enterprise Technology Officer, California Department of Technology
- 11:30 - 11:35 a.m. B R E A K – five minutes**
- 11:35 - 12:00 p.m. SPD Staff Takeaways from PG&E Pilot Implementation Plan and Recommendations**  
Jeremy Battis, SPD Safety Advisory, lead analyst for A.19-07-019
- 12:00 - 12:20 p.m. Public Comments and Questions**  
Audience Participation and Follow-up Q&A encouraged
- 12:20 - 12:30 p.m. Closing Remarks**
- 12:30 p.m. A D J O U R N**





## Origin of the Rulemaking

***I.19-06-015, issued June 27, 2019 in response to 2017 wildfires, initiates investigation to determine to what extent rule violations surrounding PG&E assets may have played a role in ignition***

***Commission Order dicta and Ordering Paragraph 13 direct PG&E to, within 30 days, file an application that seeks to develop and operate an open source, mobile app at shareholder expense to allow customer transmittal of geocoded publicly-viewable photos to a PG&E database***





## PG&E Initial Response

PG&E on July 29, 2019 filed Application A.19-07-019 proposing a limited trial concept to test the notion that the general public might aid in prevention efforts of new wildfires linked to problematic electric utility equipment

Concept hinges on transmittal of valid, non-emergency safety reports with photos from the public to the utility

The pilot's success would, in part, depend on the public's ability to competently identify PG&E assets, and discern irregularities and safety hazards

PG&E anticipates that pilot would address only above-ground publicly-visible assets such as poles and wires





## PG&E Initial Response

PG&E's application further explains that the pilot's end product would address potential problems with utility infrastructure by reporting primarily on vegetation contact and equipment failure

PG&E details multiple pilot objective challenges ahead, and outlines a plan for moving forward

PG&E proposes a rulemaking procedure that puts the proposed pilot concept before the Commission for formal pre-approval by way of a Decision, which would also provide regularity clarity and new rules to support the pilot concept





# Rulemaking Initial Steps

***Pre-hearing Conference Notice and Call for Statements***, issued by Assigned ALJ Regina DeAngelis on September 24, 2019

Parties Responded by Submitting ***PHC Statements***, on or before October 15, 2019

Assigned Commissioner Clifford Rechtschaffen on November 14, 2019, issued a ***Scoping Memo and Ruling*** to establish proceeding framework, key areas to be addressed, and a schedule to include public workshops





# Rulemaking Schedule

Proceeding Milestone	Date
Prehearing Conference	Oct. 15, 2019
Workshop 1	Dec. 3, 2019
PG&E draft Pilot Implementation Plan due	Jan. 17, 2020
Workshop 2	Feb. 12, 2020
Comments on proposed PG&E Pilot Plan due	Feb. 21, 2020
Reply Comments due	March 6, 2020
PG&E Notice of Intent to file Final revised Pilot Implementation Plan due	March 13, 2020
PG&E revised Final Pilot Implementation Plan due <i>(elective step)</i>	March 20, 2020
Proposed Decision	2 <sup>nd</sup> Quarter 2020







**End First Staff Presentation**





# Context and Scale of PG&E Customer Reach – Safety-related Web Searches

- 55 percent of PG&E web traffic originates on a mobile device (source: pilot implementation plan, p. 8)
- Number of safety-related web searches on PG&E website averages well over 4 million per month in 2019 (source: data request response, February 2020)

Month	2019	2018	2017	2016
Jan	4,787,730	3,863,449	4,436,646	
Feb	4,790,077	3,446,759	4,153,470	
Mar	4,636,000	3,917,370	3,621,891	
Apr	4,420,058	3,810,113	3,384,389	
May	4,300,172	3,879,772	3,221,109	2.97M
Jun	5,005,964	3,936,937	3,673,320	3.2M
Jul	4,885,120	4,262,948	3,586,091	3.2M
Aug	5,052,007	4,235,229	3,540,558	3.5M
Sep	5,367,513	3,871,543	3,549,839	
Oct	16,777,564	4,191,085	3,810,113	
Nov	5,930,150	3,698,772	3,312,914	3.0M
Dec	4,662,666	3,632,287	3,810,113	3.3M

*\*\*only partial data available for 2016*





# Context and Scale of PG&E Customer Reach – Wildfire Threat Tiers 2 and 3 Counties, and PG&E Accounts Impacted by Households

- 450,000 families across 38 California counties

Residential Accounts Only | Simplified to Exclude Very Low Count Counties (fewer than 100 accounts)  
38 of 58 California Counties Impacted

PG&E Customer Count by HFTD and County			
SPD Analysis Date Jan. 24, 2020			
Notes: Reflects Active Customer Accounts on Dual Fuel or Electric included; Data Source is MASST(Teradata) and HFTD is CC&B			
ABC No.	Wildfire Threat District	County Name	Total
1	7	TIERS 2 & 3 EL DORADO	37,991
2	1	TIERS 2 & 3 ALAMEDA	30,127
3	15	TIERS 2 & 3 MARIN	29,946
4	36	TIERS 2 & 3 TUOLUMNE	25,404
5	32	TIERS 2 & 3 SONOMA	24,624
6	20	TIERS 2 & 3 NEVADA	24,452
7	28	TIERS 2 & 3 SANTA CRUZ	22,745
8	24	TIERS 2 & 3 SAN LUIS OBISPO	21,511
9	6	TIERS 2 & 3 CONTRA COSTA	20,031
10	29	TIERS 2 & 3 SHASTA	19,242
11	21	TIERS 2 & 3 PLACER	18,975
12	4	TIERS 2 & 3 CALAVERAS	18,544
13	17	TIERS 2 & 3 MENDOCINO	16,017
14	25	TIERS 2 & 3 SAN MATEO	15,372
15	12	TIERS 2 & 3 LAKE	13,814
16	18	TIERS 2 & 3 MONTEREY	13,265
17	14	TIERS 2 & 3 MADERA	12,894
18	3	TIERS 2 & 3 BUTTE	12,009
19	27	TIERS 2 & 3 SANTA CLARA	11,902
20	2	TIERS 2 & 3 AMADOR	10,568
21	16	TIERS 2 & 3 MARIPOSA	8,108
22	8	TIERS 2 & 3 FRESNO	7,571
23	33	TIERS 2 & 3 TEHAMA	6,261
24	10	TIERS 2 & 3 HUMBOLDT	5,550
25	19	TIERS 2 & 3 NAPA	5,125
26	38	TIERS 2 & 3 YUBA	3,951
27	22	TIERS 2 & 3 FLUMAS	3,804
28	31	TIERS 2 & 3 SOLANO	2,618
29	26	TIERS 2 & 3 SANTA BARBARA	2,241
30	34	TIERS 2 & 3 TRINITY	1,466
31	23	TIERS 2 & 3 SAN BENITO	1,174
32	30	TIERS 2 & 3 SIERRA	825
33	11	TIERS 2 & 3 KERN	677
34	35	TIERS 2 & 3 TULARE	553
35	13	TIERS 2 & 3 LASSEN	442
36	9	TIERS 2 & 3 GLENN	205
37	5	TIERS 2 & 3 COLUSA	149
38	37	TIERS 2 & 3 YOLO	119
<b>Grand Total</b>			<b>450,261</b>





# PG&E Pilot Implementation Plan

Outlines mobile app participant recruitment plan that includes email invitations to up to 300,000 customer accounts within Wildfire Threat Tiers 2 and 3, spanning some 38 California counties

Explains that participants from this pool may be contacted in “batches” so as to ensure a manageable workload and optimal sample size

Anticipates that after self-selection attrition, the Pilot should yield 384 unique submittals, a statistically-significant sample number





## **PG&E Pilot Implementation Plan**

Proposes pilot success and evaluation criteria that weigh monetary costs against automation benefit, and the yield of valid, useful, non-duplicative reports against the potential nuisance of sorting through volumes of low-value reports

Proposes Pilot success criteria that, absent 384 unique reports from 384 unique individuals, would point to insufficient public interest to justify pilot continuation

Proposes evaluation criteria that call for the Pilot effort to offset one-to-one the opportunity costs of diverting resources from other existing PG&E safety programs





# PG&E Pilot Implementation Plan

Commits to a Pilot test period of no less than six months or until 384 unique reports are received

Commits to including one fire season, with a Pilot test period not to exceed twelve months

Commits to conferring with CPUC staff at various hypothetical progress intervals

Estimates that development and testing efforts would have the Pilot launch within six months from the date the Commission issues a Final Decision





## Deviations Sought by PG&E within Pilot Implementation Plan

- No open source code (pp. 2 and 7)
- Web-based platform rather than a downloadable smart phone app (pp. 2 and 6)
- Report data and photos not publicly-accessible in pilot phase (Implementation Plan, p. 26; Cover letter, p. 3)





## SPD Staff Recommendations

Modify planned duration of Pilot program to a minimum of one year

Consider whether timing of Pilot launch would be an important factor in its success

- Better to launch upon conclusion of a Wildfire season in order to allow for rollout and learning curve benefit?
  - *Note: Trajectory of rulemaking and project have the pilot potentially debuting in October 2020*







## **SPD Staff Recommendations**

Modify proposed Pilot success evaluation criteria to make it more typical of and benefitting a pilot program, and to offer a metric that represents an obtainable goal

If PG&E undertakes the Pilot, the utility should ensure the project is designed and resourced to enable it to achieve success





## SPD Staff Conclusions

The absence of an existing PG&E Mobile App is conspicuous and undesirable, and the Pilot should be conceived to inform a solution and address this gap

Limited industry benchmarking strongly suggests that mobile app success and consumer uptake is correlated with a platform performing more than one function





## **SPD Staff Recommendations**

Therefore, the PG&E Mobile App should include additional valuable safety information-sharing capabilities to keep customers informed in an era of heightened wildfire threats and commonplace planned power shutoffs

Accordingly, the PG&E Pilot should be scoped to offer real-time PSPS alerts and to enable customers to report a power outage





# End Second Staff Presentation





## SPD Staff Questions

For the Pilot, PG&E proposes to not make reports and photos publicly accessible.

*Please explain why PG&E is disregarding the Commission directive*

(Implementation Plan, p. 26; Cover letter, p. 3)

(Order Instituting Investigation and Order to Show Cause, p. 18; OP 13, p. 21)





## SPD Staff Questions

*What was the result of PG&E consultation and discussions with Cal Fire?*

(Scoping Memo directive, p. 7)





## SPD Staff Questions

*Please explain how 384 participants is the appropriate number that ensures a statistically-significant sample. Does this 384 number translate to a 95 percent confidence level? Would a smaller number of submittals allow sufficient evaluation of the functionality of the mobile app Pilot?*





## SPD Staff Questions

*Why is it proposed that a report with a deficient photo would result in a rejected report, but a similar report without a photo would be processed?*

(Implementation Plan, p. 23)







## SPD Staff Questions

PG&E, in proposing Pilot success evaluation criteria, predicts that the effort will syphon limited resources away from other safety programs. PG&E therefore sets an expectation for success that the Pilot deliver benefits that justify the opportunity cost of deferred related efforts. This would appear to be an argument for a one-to-one tradeoff, or cost-equal-benefit expectation.

*Is such success evaluation criteria appropriate for a pilot project?*

25 (Implementation Plan, pp. 10, 12-13)





## SPD Staff Questions

Comments presented at the first workshop suggested additional functionality, such as PSPS information be added to the proposed mobile app to increase user interest and acceptance

*Why has PG&E not proposed additional functionality to increase user interest?*





# How to Contact Us

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