



Susan C. Martinez
Director of Liaison, Regulatory
Operations and Engagement
300 Lakeside Drive
Oakland, CA 94612

October 12, 2023

VIA ELECTRONIC MAIL

Leslie Palmer
Director, Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear Mr. Palmer:

As required by Resolution ESRB-8 and in accordance with Ordering Paragraph 1 of California Public Utilities Commission (CPUC) Decision (D.) 19-05-042, Pacific Gas and Electric Company (PG&E) respectfully submits a compliance report for the potential September 30, 2023 PSPS event. PG&E did not de-energize customers for this weather event. This report has been verified by a PG&E officer in accordance with Rule 1.11 of the Commission's Rules of Practice and Procedure.

If you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in cursive script that reads "Susan C. Martinez". The signature is written in black ink and is positioned above a horizontal line.

Susan C. Martinez
Director of Liaison, Regulatory Operations and Engagement

Enclosures

cc: Anthony Noll, SED
ESRB_ComplianceFilings@cpuc.ca.gov
EnergyDivisionCentralFiles@cpuc.ca.gov

**Pacific Gas and Electric Company
Potential Public Safety Power Shutoff (PSPS) Report to the CPUC
September 30, 2023**

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**PG&E Potential Public Safety Power Shutoff (PSPS) Report to the CPUC
September 30, 2023**

Section 1 – Summary and Overview

Section 1.1 - Brief description of the PSPS event starting from the time when the utility's Emergency Operation Center is activated until service to all customers has been restored.
(D.21-06-014, page 286, SED Additional Information.)

Response:

This report covers the consideration of PSPS protocols that occurred in PG&E's service area for September 30, 2023, that did not result in a PSPS Event. High winds can cause tree branches and debris to contact energized electric lines, and potentially damage PG&E assets causing a wildfire. As a result, we may need to turn off power during severe weather to help prevent wildfires. This is called a PSPS. PG&E will not take any chances with customer safety. For the safety of our customers and communities, PSPS continues to be a necessary tool as a last resort. We know that turning off the power disrupts lives, and do not take this decision lightly.

On September 26, 2023, PG&E's Meteorology Team identified a potential fire weather event in weather forecast models and notified the acting Emergency Operations Center (EOC) Commander. On September 27, 2023, we activated our EOC for a potential PSPS Event. As weather models trended more favorably over the coming days, Meteorology continued to monitor the event until model certainty was high enough to conclude the risk of catastrophic fire was no longer possible. On September 28, 2023, PG&E's EOC was deactivated.

Section 1.2 - A table including the maximum numbers of customers notified and actually de-energized; number of counties de-energized; number of Tribes de-energized; number of Medical Baseline (MBL) customers de-energized; number of transmission and distribution circuits de-energized; damage/hazard count; number of critical facilities and infrastructure de-energized. Hazards are conditions discovered during restoration patrolling or operations that might have caused damages or posed an electrical arcing or ignition risk had PSPS not been executed (D.21-06-034, Appendix A, page A15, SED Additional Information.)

Response:

Due to change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 1.2 is not applicable.

Section 1.3 - A PDF map depicting the de-energized area(s) (SED Additional Information.)

Response:

Due to change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 1.3 is not applicable.

Section 2 – Decision Making Process

Section 2.1 - A table showing all factors considered in the decision to shut off power for each circuit de-energized, including sustained and gust wind speeds, temperature, humidity, and moisture in the vicinity of the de-energized circuits (*Resolution ESRB-8, page 3, SED Additional Information.*)

Response:

Due to change in weather, PG&E did not initiate its PSPS protocols and continued to monitor the event until model certainty was high enough to not de-energize. Therefore, Section 2.1 is not applicable.

Section 2.2 - Decision criteria and detailed thresholds leading to de-energization including the latest forecasted weather parameters versus actual weather. Also include a PSPS decision-making diagram(s)/flowchart(s) or equivalent along with narrative description (*D.19-05-042, Appendix A, page A22, D.21-06-014, page 284, SED Additional Information.*)

Response:

As explained above, due to change in weather, PG&E continued to monitor the event until model certainty was high enough to not initiate PSPS protocols.

Section 2.3 – A thorough and detailed description of the quantitative and qualitative factors it considered in calling, sustaining, or curtailing each de-energization event including any fire risk or PSPS risk modeling results and information regarding why the de-energization event was a last resort, and a specification of the factors that led to the conclusion of the de-energization event. (*D.20-05-051, Appendix A, page 9, SED Additional Information.*)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols. Below is a detailed description that was recorded by our Meteorologists analyzing the event.

September 30, 2023, PSPS Event

On September 26, 2023, some models indicated the potential for a dry northerly wind event in the Sacramento Valley and surrounding foothills, however, model uncertainty was rather high around September 30 and October 1. PG&E meteorology alerted Emergency Preparedness and Response and the EOC command team to discuss the weather forecast.

Although there was a high degree of uncertainty with the weather models, out of an abundance of caution, the EOC was activated on September 27, 2023.

Weather models began to converge around a more humid pattern that included precipitation for the area of concern by the evening of September 27, therefore, no PSPS protocols were initiated. PG&E meteorology continued to carefully monitor the weather forecast to ensure potential fire conditions did not strengthen.

This improved weather forecast was supported by federal agency forecasts. North Ops branch of predictive services did not indicate a high risk in their forecasts. Additionally, no fire weather watches or red flag warnings were issued for the area of concern by the National Weather Service offices responsible for the area.

Section 2.4 – An explanation of how the utility determined that the benefit of de-energization outweighed potential public safety risks, and analysis of the risks of de-energization against not de-energizing. The utility must identify and quantify customer, resident, and the general public risks and harms from de-energization and clearly explain risk models, risk assessment processes, and provide further documentation on how the power disruptions to customers, residents, and the general public is weighed against the benefits of a proactive de-energization (D.19-05- 042, Appendix A, page A24, D.21-06-014, page 284, SED Additional Information.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 2.4 is not applicable.

Section 2.5 – Explanation of alternatives considered and evaluation of each alternative. (D.19-05-042 Appendix A, page A22.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 2.5 is not applicable.

Section 3 – De-energized Time, Place, Duration and Customers

Section 3.1 – The summary of time, place and duration of the event, broken down by phase if applicable. (*Resolution ESRB-8 page 3, SED Additional Information.*)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 3.1 is not applicable.

Section 3.2 – A zipped geodatabase file that includes PSPS event polygons of de-energized areas. The file should include items that are required in Section 3.3. (*SED Additional Information.*)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 3.2 is not applicable.

Section 3.3 – A list of circuits de-energized, with the following information for each circuit. This information should be provided in both a PDF and excel spreadsheet. (*Resolution ESRB-8, page 3, SED Additional Information.*)

- County
- De-energization date/time
- Restoration date/time
- “All Clear” declaration date/time
- General Order (GO) 95, Rule 21.2-D Zone 1, Tier 2, or Tier 3 classification or non-HFTD
- Total customers de-energized
- Residential customers de-energized
- Commercial/Industrial Customers de-energized
- MBL customers de-energized
- AFN other than MBL customers de-energized
- Other Customers
- Distribution or transmission classification

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 3.3 is not applicable.

Section 4 – Damages and Hazards to Overhead Facilities

Section 4.1 – Description of all found wind-related damages or hazards to the utility’s overhead facilities in the areas where power is shut off. (Resolution ESRB-8, page 3, SED Additional Information.)

Response:

Due to the change in weather, PG&E did not initiate PSPS protocols, therefore, Section 4.1 is not applicable.

Section 4.2 – A table showing circuit name and structure identifier (if applicable) for each damage or hazard, County that each damage or hazard is located in, whether the damage or hazard is in a HFTD or non-HFTD, Type of damage/hazard of damage. (SED Additional Information.)

Response:

Due to the change in weather, PG&E did not initiate PSPS protocols, therefore, Section 4.2 is not applicable.

Section 4.3 – A zipped geodatabase file that includes the PSPS event damage and hazard points. The file should include items that are required in Section 4.2. (SED Additional Information.)

Response:

Due to the change in weather, PG&E did not initiate PSPS protocols, therefore, Section 4.3 is not applicable.

Section 4.4 – A PDF map identifying the location of each damage or hazard. (SED Additional Information.)

Response:

Due to the change in weather, PG&E did not initiate PSPS protocols, therefore, Section 4.4 is not applicable.

Section 5 – Notifications

Section 5.1 – A description of the notice to public safety partners, local/tribal governments, paratransit agencies that may serve all the known transit- or paratransit-dependent persons that may need access to a community resource center, multi-family building account holders/building managers in the AFN community, and all customers, including the means by which utilities provide notice to customers of the locations/hours/services available for CRCs, and where to access electricity during the hours the CRC is closed. (Resolution ESRB-8, page 3. D21-06-034, Appendix A, page A2, A9-A10, SED Additional Information.)

Response:

As mentioned in Section 1, PG&E activated its EOC on September 27 out of an abundance of caution but continued to see uncertainty in the weather forecast and if it would meet the PSPS criteria. Even with this uncertainty, on September 27, PG&E submitted its initial PSPS State Notification Form to Cal OES followed by two revisions to the form to update State Executive Briefing and Operations Briefing call information. PG&E also sent an e-mail to the CPUC notifying them that PG&E's EOC had been activated. As a courtesy, PG&E notified Tribes and counties of the EOC activation via informal live calls and emails, and to answer questions related to potential Community Resource Center (CRC) locations. Eventually, as meteorology weather models indicated that PSPS criteria and thresholds would not require de-energization, on the morning of September 28 PG&E notified Cal OES and the CPUC of the potential event concluding.

Section 5.2 – Notification timeline including prior to de-energization, initiation, restoration, and cancellation, if applicable. The timeline should include the required minimum timeline and approximate time notifications were sent. (D.19-05-042, Appendix A, page A8-A9, D.21-06-034, page A11)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 5.2 is not applicable.

Section 5.3 – For those customers where positive or affirmative notification was attempted, use the following template to report the accounting of the customers (which tariff and/or AFN population designation, the number of notification attempts made, the timing of attempts, who made the notification attempt (utility or public safety partner and the number of customers for whom positive notification was achieved. (D.19-05-042, Appendix A, page A23, SED Additional Information. “Notification attempts made” and “Successful positive notification” must include the unique number of customer counts. When the actual notification attempts made is less than the number of customers that need positive notifications, the utilities must explain the reason. In addition, the utilities must explain the reason of any unsuccessful positive notifications. (SED Additional Information.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 5.3 is not applicable.

Section 5.4 – A copy or scripts of all notifications with a list of all languages that each type of notification was provided in, the timing of notifications, the methods of notifications and who made the notifications (the utility or local public safety partners). (D.19-05-042, Appendix A, page A23, SED Additional Information.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 5.4 is not applicable.

Section 5.5 – If the utility fails to provide notifications according to the minimum timelines set forth in D.19-05-042 and D.21-06-034, using the following template to report a breakdown of the notification failure and an explanation of what caused the failure. (D.21-06-014 page 286, SED Additional Information.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 5.5 is not applicable.

Section 5.6 – Explain how the utility will correct the notification failures. (D.21-06-014, page 286.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 5.6 is not applicable.

Section 5.7 – Enumerate and explain the cause of any false communications citing the sources of changing data. (D.20-05-051, Appendix A, page 4.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 5.7 is not applicable.

Section 6 – Local and State Public Safety Partner Engagement

Section 6.1 – List the organization names of public safety partners including, but not limited to, local governments, Tribal representatives, first responders and emergency management, and critical facilities and infrastructure the utility contacted prior to de-energization, the date and time 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 CPUC GO 95, Rule 21.2-D. (Resolution ESRB-8, page 5, SED Additional Information.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 6.1 is not applicable.

Section 6.2 – List the names of all entities invited to the utility’s EOC 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 operation center. (D.21-06-014, page 289.)

Response:

PG&E invited Tribes (Grindstone and Cortina Rancheria¹ and Filsinger Energy Partners, Inc. to PG&E’s EOC via Planning Section Chief and they were virtually embedded on September 27 and September 28. Due to the change in weather and decision to de-activate the EOC, PG&E did not send invites to public safety partners.

Section 6.3 - A statement verifying the availability to public safety partners of accurate and timely geospatial information, and real time updates to the GIS shapefiles in preparation for an imminent PSPS event and during a PSPS event. (D.21-06-014, page 289.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 6.3 is not applicable.

Section 6.4 - A description and evaluation of engagement with local and state public safety partners in providing advanced outreach and notification during the PSPS event. (D.19-05-042, Appendix, page A23.)

Response:

As mentioned in Section 5.1, PG&E activated its EOC on September 27 out of an abundance of caution but continued to see uncertainty in the weather forecast and if it would meet the PSPS criteria. Even with this uncertainty, PG&E submitted the initial PSPS State Notification Form to Cal OES and two revisions to the form to update State Executive Briefing and Operations Briefing call information. PG&E also sent an e-mail to the CPUC notifying them that PG&E’s EOC had been activated. Additionally, PG&E hosted one State Executive Briefing with state agencies and had a dedicated State Operations Center Agency Representative to ensure any Cal OES questions were addressed.

¹ Although potentially impacted Tribes were invited to PG&E’s EOC, PG&E did not finalize an official scope for the potential September 30, 2023, PSPS Event.

As a courtesy, PG&E notified Tribes and counties of the EOC activation via informal live calls and emails, and to answer questions related to potential CRC locations. As meteorology weather models indicated that PSPS criteria and thresholds would not require de-energization, PG&E closed its EOC on September 28. Local and state public safety partners that were previously communicated with, were informed of the EOC closure.

Section 6.5 - Specific engagement with local communities regarding the notification and support provided to the AFN community. *(D.20-05-051, Appendix A, page 8, SED Additional Information)*

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 6.5 is not applicable.

Section 6.6 - Provide the following information on backup power (including mobile backup power) with the name and email address of a utility contact for customers for each of the following topics: *(D.21-06-014, page 300.)*

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, the information requested in Section Sections 6.6a – 6.6f is not applicable.

Section 6.6a. Description of the backup generators available for critical facility and infrastructure customers before and during the PSPS.

Response:

See response in Section 6.6.

Section 6.6b. The capacity and estimated maximum duration of operation of the backup generators available for critical facility and infrastructure customers before and during the PSPS.

Response:

See response in Section 6.6.

Section 6.6c. The total number of backup generators provided to critical facility and infrastructure customer's site immediately before and during the PSPS.

Response:

See response in Section 6.6.

Section 6.6d. How the utility deployed this backup generation to the critical facility and infrastructure customer's site.

Response:

See response in Section 6.6.

Section 6.6e. An explanation of how the utility prioritized how to distribute available backup generation.

Response:

See response in Section 6.6.

Section 6.6f. Identify the critical facility and infrastructure customers that received backup generation.

Response:

See response in Section 6.6.

Section 7 – Complaints and Claims

Section 7.1 - The number and nature of complaints received as the result of the de-energization event and claims that are filed against the utility because of de-energization. The utility must completely report all the informal and formal complaints, meaning any expression of grief, pain, or dissatisfaction, from various sources, filed either with CPUC or received by the utility as a result of the PSPS event. (Resolution ESRB-8, page 5, D.21-06-014, page 304.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 7.1 is not applicable.

Section 8 – Power Restoration

Section 8.1 - A detailed explanation of the steps the utility took to restore power. (Resolution ESRB-8 page 5)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 8.1 is not applicable.

Section 8.2 - The timeline for power restoration, broken down by phase if applicable. (D.19-05-042, Appendix A, page A24, SED Additional Information.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 8.2 is not applicable.

Section 8.3 - 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. (D.20-05-051, Appendix A, page 6.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 8.3 is not applicable.

Section 9 – Community Resource Centers

Section 9.1 - The address of each location during a de-energization event, the location (in a building, a trailer, etc.), the assistance available at each location, the days and hours that it was open, and attendance (i.e., number of visitors) (*Resolution ESRB-8, page 5, SED Additional Information.*)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 9.1 is not applicable.

Section 9.2 - Any deviations and explanations from the CRC requirement including operation hours, ADA accessibility, and equipment. (*SED Additional Information.*)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocol, therefore, Section 9.2 is not applicable.

Section 9.3 - A map identifying the location of each CRC and the de-energized areas. (*SED Additional Information.*)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 9.3 is not applicable.

Section 10 – Mitigations to Reduce Impact

Section 10.1 - Mitigation actions and impacts (both waterfall graph and map) including: sectionalization devices, temporary generation, microgrids, permanent backup generation, transmission switching, covered conductor, and any other grid hardening that mitigated the impact of the event. (D.21-06-014, page 285, SED Additional Information.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore Section 10.1 is not applicable.

Section 11 – Lessons Learned from this Event

Section 11.1 - Threshold analysis 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, page 305-306.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 11.1 is not applicable.

Section 11.2 - Any lessons learned that will lead to future improvement for the utility. (SED Additional Information.)

Response:

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore Section 11.2 is not applicable.

Section 12 – Other Relevant Information

Due to the change in weather, PG&E did not initiate its PSPS protocols, therefore, Section 12 is not applicable.

VERIFICATION

I, undersigned, say:

I am an officer of PACIFIC GAS AND ELECTRIC COMPANY, a corporation, and am authorized to make this verification for that reason.

I have read the foregoing “PG&E Public Safety Power Shutoff Report to the CPUC” for the September 30, 2023 potential event, and I am informed and believe the matters stated therein to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Oakland, California this 12th day of October 2023.



MARK QUINLAN
SENIOR VICE PRESIDENT
WILDFIRE & EMERGENCY OPERATIONS