

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE



June 28, 2021

**Advice Letter 5882-E & 5882-E-A**

Erik Jacobson  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

**SUBJECT: PG&E's Plans to Conduct Semi-Annual Public Safety Power Shutoffs (PSPS)  
Grid Resiliency Workshops in Compliance with D.20-06-017.**

Dear Mr. Jacobson:

Advice Letter 5882-E & 5882-E-A is effective as of June 24, 2021, per resolution E-5144  
Ordering Paragraphs.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy/  
Director, Energy Division

April 14, 2021

**Advice 5882-E-A**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Supplemental: PG&E's Plans to Conduct Semi-Annual Public Safety Power Shutoffs (PSPS) Grid Resiliency Workshops in Compliance with D.20-06-017**

**I. Purpose**

Pacific Gas and Electric Company ("PG&E") hereby submits this supplemental Tier 2 Advice Letter ("AL") in compliance with the California Public Utilities Commission ("CPUC" or "Commission") Decision ("D.") 20-06-017 ("Decision") Ordering Paragraph ("OP") 7 and Energy Division guidance. This supplemental advice letter replaces AL 5882-E in part and is intended to provide additional information to address the issues raised in the protests to AL 5882-E, as well as input received from Energy Division. The supplement does not change the substance of original Advice Letter 5882-E.

**II. Background**

The Commission initiated Rulemaking ("R.") 19-09-009 to develop a policy framework surrounding the commercialization of microgrids and related resiliency strategies and to implement Senate Bill (SB) 1339 (Stern, 2018).

On December 20, 2019 the assigned Commissioner's Scoping Memo and Ruling was issued, adopting a scope and schedule for Track 1 of the proceeding. Track 1 addressed deploying resiliency planning in areas that are prone to outage events and wildfires, with the goal of establishing key microgrid and resiliency strategies as soon as possible. Subsequently, on January 21, 2020, Administrative Law Judge Rizzo issued a Ruling with Energy Division staff's ("Staff's") proposal on short-term actions related to microgrids and other resiliency strategies that could be initiated in early 2020 to reduce the impact of public safety power shutoff ("PSPS") outages or other catastrophic events.

On June 11, 2020, the Commission adopted D.20-06-017, which approves certain Staff proposals for information sharing with local and tribal governments. This Advice Letter

addresses the requirements included in Ordering Paragraph 7 of D.20-06-017, which requires:

*Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit a Tier 2 Advice Letter within 30 days of the date of issuance of this decision, that document their plans to conduct semi-annual workshops designed to help empower local and tribal jurisdictions with a better understanding of grid operations, utility infrastructure, and the nature of weather events alongside utilities' Public Safety Power Shutoff (PSPS) mitigation initiatives in order to make informed decisions on where to focus their resiliency planning efforts, capital investments, and pre-PSPS event operations consistent with Section 4.3.2.1 of this decision. This Advice Letter should specifically address how the utilities plan to develop and ensure that effective internal communication processes exist for managing interface with local and tribal government by enumerating how they will achieve the outcomes below:*

- a) Designating utility interface roles and responsibilities;*
- b) Managing engagement with local and tribal government and building and sustaining effective relationships;*
- c) Establishing and maintaining open, accurate, and consistent lines of communication;*
- d) Involving local and tribal government in planning and vetting of utility actions impacting local and tribal government; and*
- e) Executing [and follow-through] on agreements impacting local and tribal governments*

*Additionally, in this advice letter filing, the utilities are directed to include draft agendas for local and tribal government engagement meetings and discuss how they plan to meet the specific content requirements of the workshops through examples of draft agenda items. Agenda items shall include, but not be limited to:*

- a) Explanations of how the electric transmission system and distribution system operates in the area;*
- b) Explanations of local grid topology and circuit configuration;*
- c) Informing local and tribal governments about electric transmission and distribution infrastructure investment and operational plans;*
- d) Discussion and visualization for context purposes of prior PSPS events;*
- e) Weather and climatology analysis predictions for anticipated PSPS events;*
- f) Case studies of outage scenarios a county is likely to experience based on predictable weather events;*
- g) Granular, local reporting of reliability statistics; and*
- h) How the utility plans to incorporate and reflect community and local and tribal government input*

*Furthermore, the utilities shall use these Advice Letter filings to explain how they plan to coordinate the collaborative planning session about enhancing grid resilience within the local and tribal government area (i.e., a county). This explanation should include how this planning session will achieve the following:*

- a) Outreach to county office of emergency services or other, similar government organizations responsible for implementing the State Emergency Plan;*
- b) Moderated by county office of emergency services administrator, or other similar government organization, (unless administrator specifically declines invitation to do so, and either designates another government organization or has the utility moderate);*
- c) Outreach to community and tribal organizations, including representation of disadvantaged communities and access and functional needs populations;*
- d) Incorporate relevant elements of a community-based collaborative planning framework as suggested by the Energy Division Staff Proposal (i.e., as the National Institute of Standards and Technology Community Resilience Planning Guide or its Resilient Communities Toolkit); and*
- e) Based on best practices such as San Diego Gas & Electric Company's community engagement.*

*The utilities shall use this Advice Letter to discuss how they intend to coordinate and harmonize these workshops with existing requirements and how they could incorporate Public Utilities Code Section 956.5-type parameters to implement the requirements of this decision. The utilities shall discuss how they plan to effectuate the following requirements:*

- a) Public Safety Power Shutoff working group meetings, as required by Rulemaking 18-12-005 and any subsequent requirements arising from that proceeding;*
- b) Disaster response plan requirements pursuant to General Order (GO) 166;*
- c) Annual reliability reporting obligations pursuant to Decision 16-01-008 and Public Utilities Code Section 2774.1; and*
- d) Land use consultation requirements as laid out in GO 131-D, Section XIV.*

Following the submission of AL 5882-E, the advice letter was protested by Marin Clean Energy, the Joint Local Governments (Counties of Kern, Marin Mendocino, Napa, Nevada, San Luis Obispo, Santa Barbara and Sonoma, and the City of Santa Rosa) and the California Environmental Justice Alliance.

### **III. Supplemental Information on PG&E's Approach for the Semi-Annual Resiliency Workshops**

In addition to information provided by PG&E in AL 5882-E, PG&E provides additional details on plans for engagement with local and tribal government, as well as community-based organizations, on wildfire mitigation activities, and building and sustaining effective relationships through hosting of the semi-annual resiliency workshops.

#### **1. Ensuring effective communication processes**

PG&E believes the regular ongoing cadence of these meetings creates a natural feedback loop, where stakeholders have an opportunity to articulate concerns and ideas for improvements in one meeting, and subsequently receive updates on those same items in the following meeting. This allows for a continuous exchange of ideas, each building upon the last, while ensuring that follow-up and status updates takes place. This also allows for PG&E's internal processes to adapt and improve based on this regular cadence of feedback and resolution. As of December 2020, PG&E is conducting online surveys to participants in the Regional Working Groups (and by extension, the Microgrid Semi-Annual Workshops) to solicit feedback on effectiveness of the workshops and seek new topics. This additional information from participant surveys enables PG&E's internal processes to be guided by this feedback, so that the Regional Working Groups/ Microgrid Semi-Annual Workshops will remain relevant to agency and community based-organization ("CBO") needs. The survey responses to the December 2020 Q4 Regionalized Working Groups were mostly positive; 95% of respondents stated that they were likely to participate in future meetings and 73% stating that the structure worked well and had no suggestions on changing it. PG&E is currently reviewing the survey results from the March 2021 Q1 Regional Working Groups (which included the semi-annual resiliency workshop content).

#### **2. Establishing and maintaining open, accurate, and consistent lines of communication**

PG&E welcomes feedback from local government agencies on how we can improve engagement processes to better suit their needs. In general, agencies have numerous outlets to provide this feedback, including but not limited to PSPS Listening Sessions, Regionalized Working Groups/Microgrid Semi-Annual Workshops, Wildfire Safety Working Sessions, PSPS Tabletops and Exercises, and informal communications with their single points of contact described in Section III.A.1 of the original advice letter. Local government agencies each have a PG&E Local Public Affairs (LPA) representative assigned to them and these representatives responsibilities include regular formal and informal interactions to ensure local government needs are understood. The relationship works bi-directionally, whereas the local government representative can reach out to the assigned area LPA representative and relay any needs or feedback. In assessing and considering agency feedback on engagement processes, PG&E aims to make improvements that will benefit all of its agency partners as a whole. In practice, this means

that PG&E will act upon much of the feedback received on engagement processes, but we cannot commit to acting upon all feedback, since some points of feedback may benefit one stakeholder group at the detriment of others. For example, if one stakeholder group believes that Regionalized Working Groups are too long, and several other stakeholder groups have communicated that the length of Regionalized Working Groups is appropriate, PG&E is not likely to change the length of the Regionalized Working Groups. In the case where PG&E decides not to act on a piece of feedback, PG&E will work with the stakeholder submitting that feedback to identify and consider alternate potential actions that could address their issue without negatively impacting other engagement participants.

### **3. Involving local and tribal government in planning and vetting of utility actions impacting local and tribal government**

PG&E recognizes that effective collaboration with local agencies can reduce project completion time and minimize disruption to communities during construction. PG&E communicates to local agencies about planned resiliency efforts like microgrids and system hardening at key project intervals (i.e. site identification, project design, construction and completion). When appropriate, PG&E subject matter experts and/or project managers accompany PG&E LPA representatives to review with local agencies. Topics discussed typically include community benefits of completion of the project, as well as potential impacts to traffic, paving, noise, and other concerns (i.e. other planned projects in area, schedule conflicts, etc.).

### **4. Workshop content**

PG&E appreciates the concerns of some stakeholders that the PSPS portion of the workshop agenda as provided in the original AL would fall after fire season had ended. When developing the workshop content and draft agendas, PG&E recognized that the first of the two semi-annual workshops would likely occur prior to the traditional start date of fire season and specifically included reviewing PG&E's electric infrastructure and planned electric system upgrades, including microgrid and temporary generation support during PSPS events, to provide local and tribal governments an update on initiatives to reduce PSPS impacts. The second workshop is intended to be utilized to review PSPS criteria, provide an update on electric system upgrades, microgrids/temporary generation and also review potential PSPS impacts. As fire season is cyclical in nature, both of these workshops will include content on PG&E's wildfire mitigation efforts as well; both updating on previously reported efforts and on future planning.

In addition, PG&E is committed to having subject matter experts (SMEs) available at the resiliency workshops. The technical and other SMEs expected to participate will support information sharing about resiliency and system hardening projects and take questions from participants. Each meeting is catered to regions, and county-level data will be provided in the appendix of the materials for each county in said region. This will allow PG&E to highlight projects and efforts that have large impacts in that region, while not

misusing valuable external stakeholders' time to present information that is not directly applicable to them. Furthermore, PG&E hosts other county-level workshops and engagement activities where that granular level of data can be further reviewed and discussed with a more targeted audience.

In an effort to streamline and consolidate meetings, as of March 2021 PG&E will integrate the semi-annual resiliency workshops with the PSPS Regionalized Working Groups, as required by Rulemaking 18-12-005, to discuss the electric grid, microgrid projects and the other topics required by D.20-06-017. One of the benefits of this workshop consolidation is that participants will be aware of a regular, twice-yearly cadence for these Regionalized Working Groups/Microgrids Workshops.

## 5. Workshop draft/sample agendas

Since the original AL was submitted in mid-2020, PG&E has continued to work on refining the workshop agendas and contents to ensure the workshops are worthwhile, take into account stakeholder feedback, and provide meaningful information to attendees. In that spirit, PG&E has modified the illustrative draft/sample agendas as shown below:<sup>1</sup>

### PG&E Electric Grid System Overview Agenda (Workshop 1)

- i. 2020 PSPS Event Recap/Feedback
  - a. Prior PSPS Impacts
  - b. Feedback Received
- ii. Flyover of Electric Grid Using GIS Mapping Technology
  - a. Review of Regional and Local Grid Infrastructure
  - b. Identify Where Substations Are Located
  - c. Examples of Local Resiliency Projects
- iii. Local Resilience Efforts
  - a. Temporary Generation / Substations / Microgrids / Community Microgrid Enablement Program / etc.
  - b. System Hardening / Sectionalizing / Other Planned or Ongoing Grid Improvements
- iv. Collaborative Grid Resilience Planning Session<sup>2</sup>
  - a. Local Feedback and Goals - Lead By County OES'
  - b. Implementation of the State Emergency Plan
  - c. Community-Based Collaborative Planning Framework
  - d. Investor-Owned Utility (IOU) Best Practices
- v. Q&A

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<sup>1</sup> Additions/changes are shown in underline.

<sup>2</sup> D.20-016-017, p 48, requires the workshops conclude with a collaborative planning session about enhancing grid resilience within subject counties, in and across all local and tribal government agency jurisdictions.

PG&E PSPS Overview Agenda (Workshop 2)

- i. PSPS Overview and Criteria
  - a. Red Flag Warning
  - b. Low Humidity Levels
  - c. Forecasted Sustained Winds and Wind Gusts
  - d. Condition of Dry Fuel
  - e. On-the-Ground, Real-Time Observations
- ii. PSPS Planning Map Using GIS Mapping Technology
  - a. Weather and Climatology Analysis Predictions for Anticipated PPS Events in the Area
  - b. Case Studies of Likely Local Outage Scenarios Based on Predictable Weather Events (Review 30-Year Weather Analysis)
- iii. Granular, Local Reliability Statistics
- iv. Update on Upcoming/Ongoing Transmission and Distribution Infrastructure Investment for Resilience and Operational Plans
  - a. System Hardening
  - b. Sectionalizing
  - c. Microgrids, Distributed Generation, Backup Generation
  - d. Other
- v. Collaborative Enhancing Grid Resilience Planning Session
  - a. Discuss Local Goals/Areas of Concern – Lead By County OES
  - b. Implementation of the State Emergency Plan
  - c. Incorporation of Relevant Elements of a Community-Based Collaborative Planning Framework
  - d. Discussion of Best Practices from Other Investor-Owned Utility (IOU) Service Areas
  - e. How PG&E plans to Incorporate and Reflect Community and Local and Tribal Government Input
- vi. Q&A/Follow Up from Previous Workshop

PG&E will incorporate the feedback gathered during these workshops into project plans, as appropriate. The workshops will also provide agencies with the opportunity to inform their own decisions regarding resiliency efforts through detailed coordination. As stated earlier in this supplemental advice letter, PG&E follows up with a survey after the workshops to ensure that concerns were properly addressed in the meeting and to learn ways to improve this format.

## **6. Collaborative Planning Sessions on Enhancing Grid Resilience**

PG&E clarifies in this supplemental advice letter how it will coordinate with County OES representatives to moderate the collaborative planning session. PG&E will coordinate with the County OES' within each region and offer the opportunity for a County OES representative in that region (or a representative from another organization designated by a County OES) to moderate the collaborative planning session portion of the

workshop. This empowers the applicable County OES' in each region to decide whether they have the ability to facilitate each meeting, but does not burden County OES with a commitment if time or resources does not allow for such a commitment. In the case that no County OES accepts or delegates the moderating role, PG&E representatives will assume the role of moderator. Regardless of who moderates, PG&E will work with the moderator of each planning session to ensure that applicable Commission compliance requirements tied to these meetings will still be met.

Additionally, PG&E recognizes the importance that Community Based Organizations hold in reaching historically under-represented communities and invites a wide selection of CBOs to these workshops. In 2020, the following CBOs were invited to participate in Regionalized Working Group meetings:

- Center for Independence of the Disabled (CID)
- Center for Independent Living (FREED)
- Central Coast Center for Independent Living
- Community Resources for Independent Living (CRIL)
- Disability Action Center (DAC)
- Disability Resource Agency for Independent Living
- Disability Services & Legal Center
- East Bay Innovations
- Far Northern Regional Center
- Golden Gate Regional Center
- Independent Living Center of Kern County
- Independent Living Resource Center (ILRC)
- Kern Regional Center
- Marin Center for Independent Living (MCIL)
- North Bay Regional Center
- North Coast Opportunities
- Northern Santa Barbara County United Way
- Red Cross
- Redwood Coast Regional Center
- Regional Center of East Bay
- Resources for Independent Living
- Resources for Independent Living Central Valley (RICV)
- Samaritan House
- San Andreas Regional Center
- San Luis Obispo County Food Bank
- Santa Barbara, San Luis Obispo Tri-County Regional Center
- SLO County Food Bank
- Tri-County Regional Center
- Valley Mountain Regional Center

These CBOs were selected because of their broad representation of populations within the Access and Functional Needs community throughout PG&E's service area. While this list is not inclusive of all of the CBOs that PG&E regularly coordinates with, it is a group that represents a cross-section of the stakeholders PG&E is trying to reach without creating a group of CBOs that is too large to have constructive conversations during a series of workshops.

PG&E plans to continue to invite this same group of CBOs to future meetings and would also consider input on other CBOs stakeholders believe should be invited to participate. CBO engagement to date has included outreach to over 260 organizations, of which 250 have agreed to become information sharing partners during PSPS events.

#### **7. Coordination of workshops with existing outreach requirements**

Given concerns expressed by a stakeholder about how PG&E will prioritize which resiliency projects are discussed at the semi-annual resiliency workshops, PG&E wishes to clarify that it will use these workshops as an opportunity to highlight projects subject to GO 131-D that impact major critical facilities or have large customer count impact but that does not mean PG&E will exclude smaller projects not requiring CPCN or PTC Applications from discussion if they could illustrate PG&E's grid hardening and resiliency efforts.

#### **IV. Protests**

Pursuant to CPUC General Order 96-B, Section 7.5.1, PG&E hereby requests the protest period be waived.

#### **V. Effective Date**

Pursuant to General Order (GO) 96-B, Rule 5.2., this supplemental advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective concurrent with original Advice Letter 5882-E, which is August 16, 2020.

#### **VI. Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list R.19-09-009. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.





# ADVICE LETTER SUMMARY

## ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
 PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5882-E-A

Tier Designation: 2

Subject of AL: Supplemental: PG&E's Plans to Conduct Semi-Annual Public Safety Power Shutoffs (PSPS) Grid Resiliency Workshops in Compliance with D.20-06-017

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.20-06-017

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes  No

Requested effective date: 8/16/20

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

<sup>1</sup>Discuss in AL if more space is needed.

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name: Erik Jacobson, c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility Name: Pacific Gas and Electric Company  
Address: 77 Beale Street, Mail Code B13U  
City: San Francisco, CA 94177  
State: California Zip: 94177  
Telephone (xxx) xxx-xxxx: (415)973-2093  
Facsimile (xxx) xxx-xxxx: (415)973-3582  
Email: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: District of Columbia Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

**PG&E Gas and Electric  
Advice Submittal List  
General Order 96-B, Section IV**

AT&T  
Albion Power Company

Alta Power Group, LLC  
Anderson & Poole

Atlas ReFuel  
BART

Barkovich & Yap, Inc.  
California Cotton Ginners & Growers Assn  
California Energy Commission

California Hub for Energy Efficiency  
Financing

California Alternative Energy and  
Advanced Transportation Financing  
Authority  
California Public Utilities Commission  
Calpine

Cameron-Daniel, P.C.  
Casner, Steve  
Cenergy Power  
Center for Biological Diversity

Chevron Pipeline and Power  
City of Palo Alto

City of San Jose  
Clean Power Research  
Coast Economic Consulting  
Commercial Energy  
Crossborder Energy  
Crown Road Energy, LLC  
Davis Wright Tremaine LLP  
Day Carter Murphy

Dept of General Services  
Don Pickett & Associates, Inc.  
Douglass & Liddell

East Bay Community Energy Ellison  
Schneider & Harris LLP Energy  
Management Service  
Engineers and Scientists of California

GenOn Energy, Inc.  
Goodin, MacBride, Squeri, Schlotz &  
Ritchie

Green Power Institute  
Hanna & Morton  
ICF

IGS Energy  
International Power Technology  
Intestate Gas Services, Inc.  
Kelly Group  
Ken Bohn Consulting  
Keyes & Fox LLP  
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated  
Waste Management Task Force  
MRW & Associates  
Manatt Phelps Phillips  
Marin Energy Authority  
McKenzie & Associates

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

Office of Ratepayer Advocates  
OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority  
Regulatory & Cogeneration Service, Inc.  
SCD Energy Solutions  
San Diego Gas & Electric Company

SPURR  
San Francisco Water Power and Sewer  
Sempra Utilities

Sierra Telephone Company, Inc.  
Southern California Edison Company  
Southern California Gas Company  
Spark Energy  
Sun Light & Power  
Sunshine Design  
Tecogen, Inc.  
TerraVerde Renewable Partners  
Tiger Natural Gas, Inc.

TransCanada  
Utility Cost Management  
Utility Power Solutions  
Water and Energy Consulting Wellhead  
Electric Company  
Western Manufactured Housing  
Communities Association (WMA)  
Yep Energy