

September 16, 2021

Via Electronic Transmission

Marybel Batjer, President
California Public Utilities Commission
505 Van Ness Avenue
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Re: August 2021 Public Safety Power Shutoff Public Briefings

Dear President Batjer and Commissioners,

In response to your August 31, 2021 letter regarding the presentations made in the Public Safety Power Shutoff Public Briefing, Pacific Power (dba PacifiCorp) welcomes the opportunity to provide additional information about our public safety power shutoff (PSPS) program. Like the California Public Utilities Commission (Commission) and the other investor-owned utilities (IOUs) in the state, a core principle of Pacific Power's PSPS program is that PSPS is a measure of last resort. Our PSPS program reflects our strong commitment to that principle. Pacific Power appreciates the Commission's efforts to ensure that the extraordinary decision to implement a PSPS is done in a manner which minimizes impacts on the public.

PSPS Decision Making. Pacific Power is continually borrowing and learning from PG&E, SCE, and SDG&E and those utilities' experiences with PSPS to implement a continuously more robust and sophisticated decision-making model. Indeed, Pacific Power's initial PSPS program, developed and implemented in 2019, drew on the experiences of those companies, and continuous improvement to Pacific Power's PSPS program has occurred since that time along the same lines. Through their more frequent and larger-scale application of PSPS, all three companies have been influential in developing emerging industry best practices. Pacific Power monitors the public proceedings and integrates observations from PSPS events implemented by other utilities. While a particular event or Commission interaction might be specific to those companies in the short term, Pacific Power understands that the standards developing around those companies' use of PSPS applies throughout California.

Pacific Power's PSPS decision making improvements that have resulted from this work include but are not limited to the following:

- PSPS decision making criteria and methods to enhance situational awareness to inform more robust and sophisticated decision-making.
- Advanced technology tools to provide granular real-time situational awareness at the local circuit level with meteorological, dry fuel, and system health criteria among other factors.
- Customer and stakeholder communication protocols, tools, and emergency services collaboration in advance of a potential PSPS, in an actual PSPS and through restoration.
- Functional exercise drill design.
- Medical baseline and AFN customer programs including battery back-up programs; and

- Methods to limit PSPS customer impacts through segmentation and rapid fault detection and accelerate grid restoration following a PSPS.

Pacific Power has shared an extensive direct exchange of information with PG&E, SCE, and SDG&E on the subject of PSPS since 2019 to-date and appreciates the value of sharing information with those companies. These interactions have varied from informal meetings to more formal participation in a joint event. Multiple Pacific Power representatives, including senior management, have toured SDG&E's Emergency Operations Center, asking questions, and sharing ideas about SDG&E's approach to PSPS. As part of this ongoing dialogue, SDG&E senior management agreed to present at a day-long wildfire mitigation workshop hosted by PacifiCorp. As another example, Pacific Power representatives have made multiple trips to visit SCE, specifically to discuss SCE's approach to PSPS. Indeed, Pacific Power's use of dedicated "circuit crews" to conduct real-time, in-the-field assessments to help inform the Emergency Operations Center (EOC) during a PSPS watch event, grew out of interactions with SCE.

Pacific Power Emergency Management attended and observed PG&E's PSPS Tabletop Exercise on May 12, 2021 and PG&E's Full-Scale Exercise the week of May 24-28, 2021. Emergency Management staff gained new insights from the discussion of community resource centers (CRC) and their implementation, including PG&E's approach to documentation and record keeping during the event and takeaways for a functional exercise using master scenario list and injects in a 100% virtual platform. Pacific Power is incorporating these ideas into its CRC, documentation, training, and functional exercise programs.

Pacific Power's PSPS planning moving forward will continue to be informed by experiences with PG&E, SCE, and SDG&E. For example, Pacific Power has purchased a High-Performance Computing Cluster (HPCC) to run a high-resolution Weather Research and Forecast (WRF) model to support PSPS decision-making. HPCC specs and WRF configuration is similar to what SDG&E and SCE currently operate. With the HPCC in place, Pacific Power plans to run an operational, high-resolution WRF twice-daily across our entire service territory. In addition, Pacific Power will create a 30-year historical WRF reanalysis, which will serve as the foundation for sophisticated forecast products. Pacific Power will also correlate the historical reanalysis with various outcomes to create impacts-based and risk-based forecast products. Advanced machine learning techniques will combine reanalysis data, operational WRF data, and historical observations to generate bias-corrected wind forecasts for weather station point locations. Pacific Power has also purchased Technosylva's Wildfire Analyst-Enterprise to support PSPS decision making. Pacific Power's decision to purchase this product was highly informed by positive feedback from SDG&E and SCE.

The practical application of these concepts and technologies will be geared towards minimizing the impact of PSPS, which Pacific Power understands as the objective goal of developing a more robust and sophisticated decision-making model. In other words, (1) we want to implement PSPS only when necessary; (2) if we have a PSPS, we want to be sure that as few customers as possible lose power; and (3) if we have a PSPS, we want to make restoration as efficient as possible, so that the duration of the event is minimized. Along these lines, Pacific Power is developing our PSPS plans so that any potential PSPS is targeted to localized conditions. A targeted approach not only reduces the total number of people out of power for any period of time, but also significantly mitigates the impact of the PSPS event on those experiencing a loss of power. Improved weather forecasting, together with a more granular understanding of wildfire risk, as contemplated in Pacific Power Localized Risk Assessment Model (LRAM), will further enable Pacific Power to deliver on our commitment to use PSPS as a measure of last resort.

Medical Baseline Customers and Equipment. As a top priority, consistent with the Phase 3 Guidelines, Pacific Power is implementing a program, at no cost to the customer, of back-up batteries to medical baseline customers who depend on medical equipment powered by electricity. Pacific Power is pleased to update that the program is now operational. A contract with a third-party vendor was executed on September 10, 2021, and battery assessments are slated to begin in the near term. Pacific Power is using the same vendor as PG&E. Pacific Power anticipates that batteries will be delivered to all registered medical baseline customers within PSPS areas by the end of 2021.

Pacific Power is working to expand the medical baseline program by increasing the rate of participation by persons eligible for medical baseline treatment. Pacific Power is participating in the Joint IOU Statewide AFN Advisory Council meetings to gain insight into needs of the AFN community and scalable IOU programs and better identify the breadth of the community in our service territory. Currently, non-utility agencies are providing Pacific Power with non-identifiable population information that will indicate, at the zip code level, the potential number of customers that are medically dependent on electricity. Pacific Power intends to compare this information with existing customer records and identify areas underserved and not represented by the company's current medical baseline customers. The insights obtained from this work are anticipated to enable Pacific Power to target communications to zip codes to encourage both enrollment in the medical baseline rate and increase the AFN population.

Pacific Power is also evaluating the feasibility and effectiveness of transportation and lodging services for medical baseline customers. Especially because of the unknown duration of an event and the highly individualized approach that any particular medical baseline customer might desire to take, there are many program considerations. Pacific Power will reach out to PG&E, SCE, and SDG&E for input on evolving standards related to this issue.

PSPS Exercises. In addition to tabletop exercises, Pacific Power is planning to complete more functional exercises to improve our PSPS readiness. Pacific Power will complete a full functional exercise in Siskiyou County in the spring of 2022. The full functional exercise will include conditions not yet faced in an actual PSPS event completed by Pacific Power. Since 2019, Pacific Power has implemented two PSPS events in its California service territory; each were of a relatively short duration (less than a day) and relatively limited geographic scope. The first PSPS event occurred in September 2020. During Pacific Power's last PSPS event in August 2021, a CRC was successfully opened and staffed at all times with a representative from the company that was able to answer questions about the event and what to expect. Community members expressed strong appreciation for the CRC. Communication notices in advance of the potential PSPS, the actual PSPS and through customer restoration followed Pacific Power's protocols and were also received positively by the impacted communities and emergency services partners.

Pacific Power's PSPS readiness is also informed by activities in other states. One unique attribute of Pacific Power is that our service territory footprint is much larger outside California than within California. PSPS developments in California are undeniably central to evolving standards considered in other western states. By interacting with emergency response agencies, state commissions and stakeholders in other states, Pacific Power is also enhancing its PSPS readiness, as informed by those different perspectives. Pacific Power has conducted some functional exercises in other states. For example, in conjunction with a table-top de-energization exercise, Pacific Power conducted a functional CRC exercise by establishing an actual CRC in Medford, Oregon on June 29, 2021. These exercises were completed with public safety partners from Jackson, Josephine, and Douglas Counties observing, which allowed those agencies to see the actual resources

available at the CRC. This functional exercise helped inform the successful deployment of a CRC during a PSPS event in northern California in August 2021. Other functional exercises are planned in the immediate future. Members of Pacific Power Emergency Management staff are travelling to Park City, Utah for a functional CRC exercise on October 14, 2021.

Pacific Power is exploring other opportunities to complete exercises with local public safety partners. As a practical matter, coordinating exercise events in the fall is difficult for such groups, because of actual wildfire response activity. Accordingly, greater focus will be given to planning exercises in the off-season, particularly next spring.

Wildfire Mitigation – Vegetation Management. Pacific Power’s 2021 vegetation management activity in its California service territory is on schedule. Pacific Power’s 2021 distribution cycle program work is on track to be complete by year-end and is currently 62% complete, which includes both the pre-inspection of 795 miles of distribution circuits and subsequent pruning and tree removal. To-date in 2021, Pacific Power has pre-inspected 467 miles, pruned 25,146 trees, and removed 2,991 trees. In addition, Pacific Power’s 2021 annual pole clearing activity is also on track to be complete by year-end and is currently 68% complete, or 10,526 poles cleared of the 15,375 total planned locations.

Access and Functional Needs (AFN) Customers. Pacific Power recognizes the value in knowing our customers and the communities in which we serve, both for PSPS purposes but also more generally. Consistent with this goal, Pacific Power is striving to gain additional insight into the number of people within our service territory who would, or might, qualify as AFN. As previously described, Pacific Power actively participates in the Joint IOU Statewide AFN Advisory Council meetings to gain insight into needs of the AFN community and scalable IOU programs and attempt to identify the breadth of the community in our service territory. Pacific Power intends to use a deeper understanding of AFN populations to improve PSPS planning. For example, the types of services offered at a CRC might be tailored to mitigate the impacts of PSPS on a concentrated group of AFN customers. Even more fundamentally, long-term system hardening projects, including installation of devices to allow for isolation, will be better informed by an improved understanding of the AFN population. For example, if sectionalization of a hardened line section enables keeping a large assisted-living center in power, the impact of PSPS on that AFN community would be significantly reduced.

With respect to labelling a particular individual as AFN, however, Pacific Power believes that self-identification is the only option which honors individual preference. The best way to empower customers who might be AFN (and thereby potentially increase self-identification rates) is through better education of the option to self-identify. There is a distinct difference between simple “self-identification,” where a customer might have the option to self-identify as AFN, but not know how or why to do so... versus informed “self-identification,” where a customer has received detailed information, delivered in an understandable format, educating the customer on an easy and convenient method for self-identification. Pacific Power’s goal is to educate customers in PSPS areas about informed self-identification. One example of such effort is evident in the recent changes to Pacific Power’s CARE program application process which allows for customers to self-identify as AFN as a part of the application or recertification. The goal of this change was to broaden outreach to the AFN community beyond medical baseline. In June of 2021, Pacific Power distributed additional education materials to all existing CARE customers and included the opportunity for customers to self-identify as AFN as a part of recertification. As a result of this change, 91 existing CARE customers newly self-identified as AFN through this mechanism, 37 of which reside in a PSPS area. This

change reflects an approximate 40% increase in identified AFN customers overall and an approximate 45% increase in the HFTD.

PSPS Thresholds. Pacific Power continues to believe that the decision to implement a PSPS will require some discretion and real-time assessments of evolving weather forecasts, local system conditions, and a variety of other factors which might weigh into the balancing of interests implicated in making any PSPS decision. Nonetheless, Pacific Power understands the desire to frame the analysis around reference to specific numbers. In this context, miles per hour wind measurements (both sustained and gusts) are relevant. But the range of wind thresholds at which Pacific Power would consider calling a PSPS event is best understood in reference to historic percentiles at particular locations, because of many variances in local conditions. As discussed in Pacific Power's Wildfire Mitigation Plan, there are specific thresholds to trigger a PSPS internal watch event, which is when Pacific Power's internal EOC convenes to continuously monitor all of the factors which might influence the PSPS decision. Assuming critical fire weather conditions and critically dry fuels, at minimum, Pacific Power might implement a PSPS when wind gusts are forecast to exceed the 95th percentile. The likelihood of a PSPS then substantially increases when (a) wind gusts are forecast to reach or exceed the 99th percentile and (b) Pacific Power's Localized Risk Assessment Model (LRAM) Outage Model indicates the potential for wind-related outages in the area.

Covered conductor will impact these thresholds. At this time, Pacific Power does not plan to change the criteria for when an internal watch is convened. But the hardening impact of covered conductor is an important factor that the EOC would consider during the internal watch event. First, in applying operational discretion, the existence of covered conductor (which, in light of construction efficiencies, is typically also coupled with other system hardening mitigation initiatives) will factor heavily against implementing a PSPS, even when forecasts are in the 99th percentile. Obviously, if less than 100% of the circuit (or isolated segment) was covered conductor, the factor would weigh less heavily, depending on the local circumstances. Second, over time, Pacific Power expects that covered conductor will have a dramatic impact on the LRAM Outage Model output of potential wind-related outages by reflecting an expected large reduction in the number of wind-related outages related to a line with covered conductor. It will take time to build that empirical data set, but Pacific Power expects that the objective incorporation of the LRAM Outage Model will essentially confirm the propriety of having covered conductor weigh against PSPS implementation.

Fundamentally, the installation of covered conductor changes the actual risk to the system from interference involving a conductor and a pole or other structural element. As an example of how this may work practically for a given circuit without installed covered conductor or other grid hardening elements, a wind speed of 35 mph may exceed the 95th percentile trigger and result in a watch or de-energization. Prior to the installation of covered conductor, the bare conductor is the most exposed element and at greatest risk of vegetation contact or damage. Therefore, the wind speed thresholds are determined based on the risk of tree blow-in contacting the bare conductor. After the installation of covered conductor, the conductor itself ceases to be the greatest risk element in the system. Instead, wind thresholds can be determined based on the potential for trees to damage or impact structural elements, such as poles, and it should require significantly more force to damage that type of equipment. Therefore, Pacific Power may expect the wind threshold to increase, for example, to 60 mph, after the installation of covered conductor, as the risk and mechanism have changed.

In closing, we at Pacific Power echo your concern for the safety and well-being of Californians. If we implement a PSPS, it is with this concern in mind and protecting the public from a wildfire. At the same time, the health and safety risks of de-energization are front and center in the analysis performed by our EOC whenever a PSPS is considered. Pacific Power recognizes and appreciates that PSPS is a relatively new approach and that all utilities need to be open to learning and adapting. We are committed to improving our PSPS processes and welcome engagement on this topic.

Sincerely,



Stefan A. Bird
President and CEO

cc: Service List for R.18-12-005 and I.19-11-013

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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Examine
Electric Utility De-Energization of Power
Lines in Dangerous Conditions

Order Instituting Investigation on the
Commission's Own Motion on the Late
2019 Public Safety Power Shutoff Events

Rulemaking 18-12-005
(Filed December 19, 2018)
(Not Consolidated)

I. 19-11-013
(Filed November 13, 2019)
(Not Consolidated)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **Pacific Power Response to President Batjer's Letter requesting additional information on August 4, 2021 PSPS Briefing** on all known parties to I.19-11-013 by transmitting an e-mail message, or by US Mail if an e-mail address has not been provided, with the document attached to each person named in the official service list.

(See the attached Service List I.19-11-013)

Executed on **September 16, 2021**, at Portland, Oregon.



Mary Penfield
Adviser, Regulatory Operations



California
Public Utilities
Commission



[CPUC Home](#)

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: I1911013 - CPUC - OII ON THE LA
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: AUGUST 4, 2021

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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Examine Electric
Utility De-Energization of Power Lines in Dangerous
Conditions.

Rulemaking 18-12-005
(Filed December 13, 2018)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **Pacific Power Response to President Batjer's Letter requesting additional information on August 4, 2021 PSPS Briefing** on all known parties to R.18-12-005 by transmitting an e-mail message, or by US Mail if an e-mail address has not been provided, with the document attached to each person named in the official service list.

(See the attached Service List R.18-12-005)

Executed on **September 16, 2021**, at Portland, Oreg



Mary Penfield
Adviser, Regulatory Operations



California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: R1812005 - CPUC - OIR TO EXAMIN
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: SEPTEMBER 14, 2021

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