



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

January 4, 2019

President Michael Picker
Commissioner Carla J. Peterman
Commissioner Liane M. Randolph
Commissioner Martha Guzman Aceves
Commissioner Clifford Rechtschaffen
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Power Shutoff Response

Dear Commissioners:

On behalf of the Rural County Representatives of California (RCRC), I am writing in response to the Pacific Gas and Electric's (PG&E) Public Safety Power Shutoff policies and procedures related to turning off power for safety due to extreme weather and wildfire danger. It has come to our attention that in a number of rural areas the shutoff has not been satisfactory.

RCRC is an association of thirty-six rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from those member counties. RCRC member counties continue to suffer from devastating, high severity wildfires that constitutes some of the largest, most destructive wildfires in the history of California, including the Tubbs Fire last year in the Wine Country and more recently the Camp Fire in Butte County. Wildfire risk has spread to larger areas of California's landscape as the wildland-urban interface expands. The wildfire threat is made more dangerous due to fuels loads on the forest floor combined with climate change and the lingering impacts of the recent five-year drought.

During the week of October 14, 2018, a number of RCRC member counties and residents located in Amador, Butte, Calaveras, El Dorado, Lake, Napa, Nevada, Placer, Plumas, Sierra, Sonoma, and Yuba were advised they would likely experience power shutoffs due to severe winds that could trigger wildfires. Advance notice and preparation for such shutoffs is extremely important for communities, particularly in rural areas populated by a higher percentage of elderly persons that rely on electricity to sustain vital health care needs. We have since surveyed the affected RCRC member counties, and realized that there is no universal procedure for PG&E power shutoffs. Based on the findings, it appears both Calaveras and Yuba Counties had good communication with PG&E; whereas Napa, Sonoma, and Placer Counties did not. The frequent theme from RCRC member counties regarding

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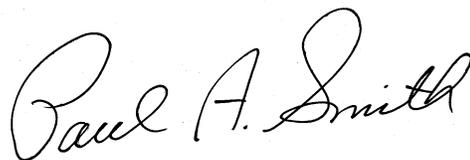
PG&E's handling of the power shutoff was the lack of adequate and timely information disseminated to both residents and key county leaders (i.e. Sheriff and Office of Emergency Services officials) to sufficiently prepare impacted communities for the impending shutoffs.

PG&E uses the California Public Utilities Commission (CPUC) High Fire-Threat District Map, developed in coordination with CAL FIRE and based on input from electric utilities, communications infrastructure providers, and local public safety agencies. These maps were designed to identify areas that are at elevated risks of wildfire, and are supposed to indicate specific areas and number of affected customers. However, feedback from RCRC member counties indicate the maps used to determine the areas to shutoff power were not helpful nor accurate in identifying areas where advance communication was most critical.

PG&E disclosed a regulatory filing earlier in the month that it had "experienced an outage" on a transmission line in Butte County approximately 15 minutes before the Camp Fire began. For reasons that remain unclear, PG&E decided not to shut off power that day. While we understand the difficulty with PG&E's predicament, this further leads us to believe that the methods used to determine power shutoff are mediocre at best, and necessitate a careful, thorough, inclusive public process to ensure that any de-energization policies meet the needs of fire-prone communities around the State.

We are aware CPUC is in the process of establishing standards for disaster and emergency preparedness plans for electrical corporations and regulated water companies. We encourage dialogue to take place that would improve PG&E's interaction in future power outages, and would strongly recommend that CPUC hold numerous public workshops in areas most impacted by recent fire events. RCRC looks forward to working with CPUC to provide any assistance we can offer. If you have any questions, please contact me at (916) 447-4806 or psmith@rcrcnet.org.

Sincerely,



PAUL A. SMITH
Vice President Governmental Affairs

cc: Members of the Calaveras County Board of Supervisors
Members of the Napa County Board of Supervisors
Members of the Nevada County Board of Supervisors
Members of the Sierra County Board of Supervisors
Members of the Sonoma County Board of Supervisors