



**To:** RCRC Board of Directors  
**From:** Staci Heaton, Regulatory Affairs Advocate  
Leigh Kammerich, Regulatory Affairs Specialist  
**Date:** April 16, 2019  
**Re:** California Public Utilities Commission Wildfire Proceedings Update

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### **Summary**

The California Public Utilities Commission (CPUC) has initiated two proceedings that will have significant impacts on how investor-owned utilities (IOUs) engage with the public on wildfire hazard mitigation and de-energization of power grids to prevent high severity wildfires. This memo provides a summary of the progress of those proceedings, and RCRC's participation.

### **Background**

The CPUC has begun two separate proceedings to tackle the complex issues surrounding IOUs and their role in wildfire prevention. First, the CPUC is using an existing proceeding opened in October 2018 to conduct the public review process for the IOUs' wildfire hazard mitigation plans pursuant to Senate Bill 901 (Dodd), which was signed into law in 2018. The IOUs submitted their initial plans on February 6, 2019, which are available for public review on the CPUC's website: <http://cpuc.ca.gov/SB901/>.

The second proceeding will determine how the IOUs conduct their de-energization events when there are extreme wind events and elevated threats of wildfire. The rulemaking was opened in December 2018, with workshops held in Santa Rosa in December 2018, and Calabasas in January 2019, to discuss potential, and already-seen impacts of utility de-energization practices. The IOUs "Public Safety Power Shutoff Programs" are available for public review on the CPUC website: <http://www.cpuc.ca.gov/deenergization/>.

CPUC proceedings in cases such as these are considered "quasi-legislative" because they establish policy or rules affecting a class of regulated entities. In order to file comments that are considered as part of the formal record of a proceeding, which have greater impact in a quasi-legislative rulemaking, an entity must file for "party status" with the CPUC. The RCRC Board of Directors approved RCRC's official participation in both proceedings at its March 2019 meeting.

### **Issue**

RCRC filed for and was granted party status in both proceedings on March 18, 2019. The de-energization proceeding under docket number R.18-12-005 was in its initial scoping phase and was receiving comments on its Phase I Scoping Memo. RCRC filed comments on the memo (Attachment 1) with recommendations on various aspects of IOU de-energization practices, including public notification practices, what information should be released to both local governments and the public before a de-energization event, how to identify “vulnerable populations,” and most importantly, how to integrate local governments into the process of determining the best methods of communication by region to tailor practices to local needs. The IOUs are currently filing their replies to the Phase I comments before the next stage of the proceeding.

As of RCRC’s filing for party status, the wildfire hazard mitigation plan proceeding under docket number R.18-10-007 was in the reply comment phase for the IOUs, and RCRC will have opportunities to comment on the next phase in the near future.

### **Staff Recommendation**

RCRC staff will update the Board of Directors on both proceedings as they progress in the coming months.

### **Attachment**

- RCRC Comments on Opening Comments to Scoping Memo and Ruling (Phase I) Rulemaking 18-12-005