

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
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January 19, 2021

Via Email Transmission Only

Kevin Payne
Kevin.Payne@sce.com
President and Chief Executive Officer
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, CA 91770

Re: 2020 Southern California Edison Company Public Safety Power Shutoff Performance

Dear Mr. Payne:

I write to express deep concern regarding Southern California Edison Company's (SCE) overall execution of Public Safety Power Shutoff (PSPS) events in 2020. Utilities should execute PSPS events in a manner that places the safety and wellbeing of the people and communities they serve first. Over the course of the PSPS events SCE called in 2020, staff from the California Public Utilities Commission (CPUC), the California Department of Forestry and Fire Protection (CAL FIRE), and the California Office of Emergency Services (Cal OES) observed numerous instances in which SCE's PSPS execution appeared tactless, and in many regards, seemed deficient in meeting the standard its customers deserve.

From May through December 2020, SCE initiated 16 PSPS events, with the majority of the events occurring in November and December, including two PSPS events during major holidays. The loss of power causes major disruptions to businesses, medical facilities, communication carriers and other critical infrastructure. It strains state and local emergency and public safety personnel as they work to ensure public safety. And, if conducted ineffectively, particularly without reliable communication, these events can endanger lives and property, especially for those individuals who are reliant on power for medical reasons.

By way of observations from my counterparts in leadership at CAL FIRE and Cal OES, CPUC safety enforcement staff assessments of SCE PSPS post-event reports, and comments on those reports from stakeholders, the CPUC has identified five major areas where SCE underperformed in its execution of PSPS events: 1) transparency of PSPS the decision-making process, 2) execution of the notification process, 3) coordination and communication with state and local governments, 4) identification and notification of Medical Baseline and Access and Functional Needs customers, and 5) quality of PSPS post-event reports. Greater detail of our concerns is outlined in this letter. In addition, I continue to have concerns with the pace at which SCE is deploying backup power to vulnerable customers through its Critical Care Backup Battery program.

Because safety is the utmost priority to the CPUC, CAL FIRE, and Cal OES, this letter serves as notice to SCE regarding improvements SCE must initiate now with urgency. Nothing in this letter precludes future potential enforcement actions by the CPUC.

In addition, this letter serves to notify you that SCE shall:

Appear at a public meeting of the CPUC, CAL FIRE, and Cal OES on January 26, 2021, at 2 p.m., to answer questions regarding its PSPS execution and describe the company's plan for corrective actions based on the concerns identified in this letter. The following individuals from SCE, at a minimum, are directed to be present and available at this meeting:

- Kevin M. Payne, President and Chief Executive Officer
- Steve D. Powell, Executive Vice President, Operations
- Jill C. Anderson, Senior Vice President, Customer Service
- Phil Herrington, Senior Vice President, Transmission and Distribution
- Erik Takayesu, Vice President, Transmission, Substations and Operations
- Marc L. Ulrich, Vice President, Customer Service Operations

By February 12, 2021, SCE shall submit a corrective action plan to the CPUC with service to the Rulemaking (R.)18-12-005 service list and submit biweekly updates on progress toward the corrective action plan, also served biweekly to the R.18-12-005 service list. SCE shall also provide regular and as-requested updates to CPUC staff of the Safety and Enforcement Division, Safety Policy Division, and Wildfire Safety Division about progress toward the corrective actions.

The many issues identified below have been previously identified in CPUC decisions, including D.19-05-042, D.20-05-051, and ESRB-8, and SCE is expected to comply with the requirements in those decisions and any future decisions. It is critical that SCE learn from the 2020 PSPS events and take steps immediately to ensure mistakes and operational gaps are not repeated.

1. Transparency of the PPS Decision-making Process

The CPUC acknowledges the complexity of the PPS decision-making process. It is, however, incumbent upon the utilities to minimize the frequency of events and ensure PPS is absolutely the last resort. To help demonstrate that SCE is in fact approaching PPS in this manner, SCE must enhance the transparency of its PPS decision-making process.

At a minimum, SCE shall:

- Provide improved data analytics and enhanced visibility of its PPS decision-making process. Particularly:
 - Provide quantitative analysis of all factors that SCE utilizes when considering de-energization.
- Identify and document the authorities of Senior Officer in Charge, or equivalent position, and how all elements of the utility emergency operations are clearly aligned under the command of this position.
- Identify and document all executives with the title of Vice President, or equivalent, and above, with responsibilities in making the decision to call a PPS event.
- Identify and document all Board members and Board committees with PPS decision-making oversight.

2. Execution of the Notification Process

A major deficiency in SCE's 2020 PSPS implementation was its execution of notifications to public safety partners and customers during PSPS events. De-energization without any advance notifications should occur only in an extremely rare and justifiable situation. Some examples of SCE's deficiencies include:

- Large variance in number of customers initially notified versus the number actually de-energized.
- De-energizations without any prior customer notifications. For example, phone notification failing to contact customers due to vendor data processing issues.
- Inaccurate and confusing notifications, such as customers being informed they were re-energized when they were not.
- Notifications missing required information such as the defined time intervals for de-energization and the ArcGIS and shapefiles.
- Ineffective notification to communications providers, which made it difficult to distinguish PSPS events from other planned outage events.

Advanced and accurate notifications are vital for customers, critical facilities and public safety partners to prepare for a de-energization, and are required by CPUC regulations. SCE must improve its notification procedures and adhere to the CPUC's PSPS guidelines.

At a minimum, SCE shall:

- Reduce the significant variance between the number of advance customer notifications sent out and the actual number of customers de-energized in a PSPS event.
- Research and document the root cause of any instance in which SCE's notification process failed to notify customers in advance of a PSPS event and implement appropriate corrective actions. If the notification deficiency was due to the weather, establish processes to fully demonstrate the rapidity of the change in weather conditions that led to a de-energization without being able to notify customers in advance. If due to other reasons, such as internal processes, database or vendor issues, SCE should immediately act upon those issues to address the problem.
- Improve SCE's Incident Management Team's processes and protocols to:
 - Ensure notifications follow the timing interval guidelines and include estimated start date, time and duration of the de-energization event, and the estimated time of power restoration.
- Develop a communication and notification strategy in anticipation of the disruption of the traditional communication channels. In doing this, SCE shall coordinate with public safety partners to use in-language public alert system and public radio broadcasts in de-energization impacted areas in situations where internet, cellular, or landline-based communication services are limited.

3. Coordination and Communication with State and Local Governments

Executing a PSPS event requires coordinated efforts across multiple state and local jurisdictions as well as other public safety partners. Nevertheless, the utilities are ultimately responsible and accountable for the safe deployment of PSPS. In 2020, SCE's communications were lacking in numerous areas, which resulted in confusion and expenditure of resources that could have been avoided. Specifically:

- SCE missed and sent late notifications to the California State Warning Center (CSWC), provided incorrect information in the Essential Elements of Information (EEI) submittals, and was slow to resolve problems identified by the CSWC.
- SCE did not abide by the State Operations Guide (SOG) for scheduling Operational Briefings separately from State Executive Calls, which impaired the effectiveness of both meetings for state and county/tribal participants.
- SCE did not clearly communicate about which public safety partners it engaged during the PSPS events, and what information was communicated during the PSPS events.

SCE shall:

- Establish a more effective and efficient communication structure with counties and the State; Conduct after action reviews with counties and state agencies to better understand their information needs; Improve SCE's internal process to ensure timely and accurate information is submitted to CSWC; Take a proactive approach for prompt resolution of problems and establish a timeline to resolve problems during the communication with local and State government agencies.
- Separate the Operational Briefings from State Executive Briefings to ensure each call serves its own purpose.
- Coordinate with counties, tribal governments, and Cal OES to develop and validate a list of public safety partners, including local government agencies and critical facilities.
- Develop a process to ensure public safety partners have the opportunity to adequately engage for each PSPS event. SCE should develop metrics and seek feedback from these organizations after each event to evaluate the effectiveness of the engagement, and to identify specific actions to be taken to address such feedback.
- Host a town hall style meeting or public information dissemination gatherings to report back to the impacted communities by March 31, 2021.

4. Identification and Notification of Medical Baseline and Access and Functional Needs Customers

Ensuring that Medical Baseline and Access and Function Needs customers are sufficiently identified and notified of PSPS events is critical to helping ensure the safety and wellbeing of some of the state's most vulnerable residents. SCE's approach to identifying and notifying Medical Baseline customers of a PSPS event was lacking in a number of areas. Specifically:

- SCE did not confirm that all Medical Baseline customers received a PSPS notification. Rather, SCE confirmed notifications to critical care customers, a subset of Medical Baseline customers. While critical care customers are the most immediately vulnerable during PSPS events, customers with multiple simultaneous needs are also a high priority.
- SCE did not provide state agencies sufficient information to evaluate whether SCE's approach to developing customer care plans for Access and Functional Needs customers identified the appropriate customers or was executed well.
- SCE's Medical Baseline customer enrollment approach appears to result in a proportionally smaller group of Medical Baseline customers enrolled as a subset of its total customer population relative to other utilities' approaches.

SCE shall:

- Develop a process to ensure positive notification of all Medical Baseline customers, not just critical care customers.
- Provide its Access and Functional Needs vulnerability criteria and framework on its public website.
- Develop a plan to review and expand its Medical Baseline notification and enrollment program.

5. Quality of PSPS Post-Event Reports

There were a number of deficiencies with the PSPS post-event reports SCE filed with the CPUC. These issues include:

- Late filing, combining different events into one report, incomplete reporting of complaints, and missing basic required reporting information. For example, SCE did not follow the required categorization for reporting potentially affected customers and did not report the number of actually affected customers by the required categories.

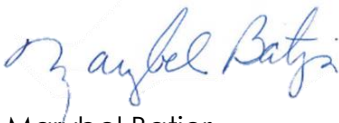
Incomplete reporting limits the CPUC's ability to assess the magnitude and severity of each event. SCE shall:

- Improve its reporting process to ensure the accuracy, completeness and consistency of PSPS post-event reports.
- Ensure future PSPS post-event reports properly reflect the improved practices as identified in items 1-4 of this letter.

We expect SCE leadership to fulfil its responsibility to reach determinations on the use of PSPS only as a last resort, and to execute PSPS safely and with minimal impact for its customers and for all Californians. If SCE requires additional assistance from the State in order to execute this critical mission, SCE should communicate what is needed, and the CPUC will work with our State agency partners to take appropriate steps.

Please contact Anthony Noll at Anthony.Noll@cpuc.ca.gov should you have any questions concerning this letter in preparation for the January 26, 2021 public meeting.

Sincerely,



Marybel Batjer
President
California Public Utilities Commission

cc: Mark Ghilarducci, Director
California Governor's Office of Emergency Services

Thomas Porter, Director
California Department of Forestry and Fire Protection