

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 7, 2023

Tara Kaushik
Managing Director, Regulatory Relations
Southern California Edison (SCE)
2244 Walnut Grove Avenue
Rosemead, CA 91770

SUBJECT: Notice of Violation Southern California Edison 2021 Public Safety Power Shutoff Events

Dear Ms. Kaushik:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC), Wildfire Safety & Enforcement Branch (WSEB), Cindy Chen of my staff evaluated the compliance reports submitted by Southern California Edison (SCE) concerning its 2021 Public Safety Power Shutoff (PSPS) events. SCE initiated a total of twelve PSPS events in 2021.¹ The information used in our evaluation is from the compliance event reports and the Corrections filed by SCE as required in Resolution ESRB-8, Decision (D.) 19-05-042, D.20-05-051, D.21-06-014, D. 21-06-034, and the Administrative Law Judge's Ruling on the Post Event Report Template. We also considered stakeholders' comments in our evaluation.

Customer Notification Violations

Over the course of our evaluation, WSEB found numerous instances where SCE failed to notify customers after de-energization. D.19-05-042 requires that the electric investor-owned utility provide notification to customers "at the beginning of a de-energization event, when re-energization begins and when re-energization is complete." Specifically, we found that between the twelve 2021 PSPS de-energization events, 42,225 customers were not notified before de-energization, 32,634 customers were not notified before re-energization, and 22,290 were not notified when re-energization was complete.

¹ As mentioned below, ten Post Event PSPS reports were submitted for twelve PSPS events. Only one report was submitted for the three PSPS events in January 2021.

Table 1

Event	Initiation	Before Re-energization	Re-energization Complete	Total
Jan. 12-21 ²	39,997	29,440	18,527	87,964
Oct. 15-16	N/A	21	n/A	21
Nov. 24-26	2,228	3,173	3,763	9,164
Total	42,225	32,634	22,290	97,149

Resolution ESRB-8 Violations

Notification to SED Director

WSEB found that SCE violated several PSPS requirements under Resolution ESRB-8, requiring the utility to notify the Director of SED no later than 12 hours after the power shut-off (3). For the October 11-12 event, SCE notified the Director 17 hours after the power shut-off. For the January 12-21, April 12-13, and September 29-30 events, SCE did not include the estimated restoration time. For the November 24-26 event, SCE notified the Director of SED that power had fully been restored when the power had not, in fact, been restored.

Post Event Report

Additionally, ESRB-8 requires the utilities to submit a report (Post Event Report) within ten business days after a de-energization event (5). For the events on January 12-21, SCE initiated de-energization three times. Those events concluded on January 15, January 17, and January 21. SCE submitted one report combining each of the three PSPS events on February 4.

Table 2

Period of Concern	Event Concluded	Report Due Dates	SCE's Filing Dates	Days Overdue
Jan. 12 – Jan. 15	Jan. 15	Jan. 29	Feb. 4	6 days
Jan. 16 – Jan. 17	Jan. 17	Jan. 29	Feb. 4	6 days
Jan. 18 – Jan. 21	Jan. 21	Feb. 4	Feb. 4	0

² The combined January 12-21 event report did not include a breakdown of the three types of notifications required in D.19-06-042. Until this reporting error is clarified, WSEB must assume these notifications were not made.

As part of the report, the utility must provide the “time, place, and duration of the shut-off event” (3). For the January 12-21 report, SCE provided inconsistent information about where the de-energization occurred. In the report’s Attachment A, it appears that Ventura and San Diego Counties were de-energized, while the report omits these two counties.

The report must also include the “number of affected customers, broken down by residential, medical baseline, commercial/industrial, and other” and provide “the local communities’ representatives the IOU contacted” along with the tier classification (3). SCE failed to do so for the January 12-21 and April 12-13 events and did not provide the tier classification for the June 14 event.

For the October 16-18 event, SCE did not report the number of complaints and claims separately, as required by ESRB-8 (5). Rather, they lumped complaints and claims together.

Violations of D.19-05-042

Post Event Report

In addition to the violations listed above, SCE violated several Post Event Report requirements of D.19-05-042. D.19-05-042 requires the Post Event Report to also be served on the service list of R. 18-12-005 and R.18-10-007 within ten days of the power restoration, along with a link to the report on the utility’s website (Appendix A at A22). As mentioned above, SCE incorrectly consolidated the reports for the three power shut-offs in January, which means two were late. Additionally, for the January 12-21, April 13, and June 14 reports, the service link did not link to the utility’s post event report rather, only the SCE’s wildfire page.

The Decision instructs the utilities to include in the report the decision criteria leading to de-energization including an evaluation of alternatives to de-energization that were considered. The Decision also requires the utilities to clearly articulate thresholds for strong wind events as well as conditions that define “an extreme fire hazard.” SCE did not establish the threshold criteria for the January 12-21 or April 12-13 reports. In addition, SCE did not describe nor evaluate the alternatives to de-energization for the events of January 12-21, April 12-13, June 14 , or October 22.

The decision requires the utility to evaluate the engagement with local and state public safety partners (A22-A23). SCE only described the engagement but did not evaluate it

for several occasions including January 12-21, April 13, June 14 and September 29-30 events. For the January 12-21 event, SCE did not provide the number of critical care customers notification attempts made, nor track medical baseline customers for positive notifications (A22-23).

Notifications

D.19-05-042 imposes additional notification requirements to the ones outlined above. This decision requires customer notifications at 48-72 hours, 24-48 hours, and 1-4 hours prior to de-energization to public safety partners, critical facilities, or customers (A8). SCE failed to meet the advance notification requirements as described below:

Table 3

Event	Notification Failure	Entity/Customer Accounts	SCE's Explanation
Jan. 12 – 21	1 – 4 hours	Not reported. Total of 106,160 customers were de-energized.	Either because actual onset of weather varies drastically from the forecasted weather, or because the Incident Commander believed the need to de-energize quickly to maintain public safety took priority over the need to provide imminent notification and the communications team was not advised of de-energization until after the fact.
	No advance notification at all	4,819	Not originally forecasted to be in scope.
April 13	48 – 72 hours	Not reported. Total of 78 customers were de-energized	No explanation provided.
	1 – 4 hours	Not reported. Total of 78 customers were de-energized.	No explanation provided.

Event	Notification Failure	Entity/Customer Accounts	SCE's Explanation
June 14	48 – 72 hours	Not reported. No customers were de-energized in this event.	Winds were not forecasted to exceed threshold in those notification timeframes.
Sep. 29 – 30	48 – 72 hours	44	In-house weather models were consistently forecasting wind speeds below PSPS threshold criteria.
	24 – 48 hours	6	No explanation provided.
	1 – 4 hours	44	35: In-house weather models were consistently forecasting wind speeds below PSPS threshold criteria 9: No explanation provided.
	No advance notification at all	4	No explanation provided.
Oct. 11 – 12	48 – 72 hours	4	Not forecasted in scope by 48 hours before de-energization.
	24 – 48 hours	5	Not forecasted in scope by 24 hours before de-energization.
	1 – 4 hours	43	Escalating weather conditions.
	No advance notification at all	18	No explanation provided.
Oct. 15 – 16	48 – 72 hours	5	Not forecasted in scope by 48 hours before de-energization.
	24 – 48 hours	27	No explanation provided.
	1 – 4 hours	67	40: Escalating weather conditions. 27: No explanation provided.
	No advance notification at all	43	No explanation provided.
Oct. 16 – 18 ³	48 – 72 hours	Not reported. No customers were de-energized during this event	Onset weather conditions.

³ SCE did not report any notification failure for Oct. 16 -18 event. The notification failure in Table 3 is inferred by SED from SCE's reported timeline.

Event	Notification Failure	Entity/Customer Accounts	SCE's Explanation
	24 – 48 hours	Not reported. No customers were de-energized during this event	Onset weather conditions.
Oct. 22	48 – 72 hours	8	Not forecasted in scope by 48 hours before de-energization.
	24 – 48 hours	107	Not forecasted in scope by 24 hours before de-energization.
	1 – 4 hours	115	Rapidly escalating weather conditions.
	No advance notification at all	15	No explanation provided.
Nov. 21 – 22	48 – 72 hours	7	Not forecasted in scope by 48 hours before de-energization.
	24 – 48 hours	2,685	Not forecasted in scope by 24 hours before de-energization
	1 – 4 hours	4,365	Rapidly escalating weather conditions
	No advance notification at all	1,004	1: Miscommunication between operations and notifications teams. 1,003: No explanation provided.
Nov. 24 – 26	48- 72 hours	512	Not forecasted in scope by 48 hours before de-energization.
	24 – 48 hours	55,608	Not forecasted in scope as of 24 hours before de-energization; in some limited cases, not sent due to internal missed communication.
	1 – 4 hours	63,613	Rapidly escalating weather conditions and in some cases, possibly a temporary e-mail server outage, in some limited cases, not sent due to internal missed communication.
	No advance notification at all	29,780	Rapidly escalating weather conditions and in some cases, possibly a temporary e-mail server

Event	Notification Failure	Entity/Customer Accounts	SCE's Explanation
			outage, in some limited cases, not sent due to internal missed communication.

SCE did not notify public safety partners of the estimated time to full restoration, as required in Appendix A, page A16. SCE did not notify customers of an estimated start time of the event, nor the estimated time of power restoration as required in A22-A23.

Violations of D.20-05-051

Post Event Report

Added to the Post Event Report requirements above, D.20-05-051 requires utilities to “enumerate and explain the cause of any false communication...by citing the sources of changing data” (Appendix A at 4). For the following events, SCE sent event cancellation notifications to more customers than it sent the de-energization notifications. SCE did not accurately enumerate one or both of the two-notification metrics.

Table 4

Event	Total Customers Notified	Total Customers Cancelled	Corrections Page #
Oct. 11 – 12	12,033	13,426	P11
Oct. 15 – 16	3,478	3,727	P14
Oct. 22	601	632	P20

For the September 29-30 event, SCE did not explain why one public safety partner was not notified. For the October 11-12 event, SCE did not explain why SCE incorrectly notified customers and local governments on one circuit that their power was restored when, in fact, only a portion of the circuit had been restored.

Appendix A (d) requires a Community Resource Center (CRC) to be operable between 8:00 AM-10:00 PM during active de-energization, which for the January 12-21 events, SCE did not operate to the specified hours for some CRCs or give an explanation in the Post Event Report. For the April 13 event, SCE reported operating a CRC outside the

hours of de-energization without explanation. SCE also did not operate a CRC during the times required for the events on October 15.

Last, Appendix A (h) requires the Post Event Report to include “a thorough and detailed description of the quantitative and qualitative factors it considered in calling, sustaining, or curtailing each de-energization event.” SCE failed to include this description for the January 12-21 event, the April 13 event, or the June 14-15 event.

Violation of D. 21-06-014

Post Event Report

D.21-06-014 places additional requirements in the Post Event Report. For the June 14 event, SCE failed to “identify and quantify customer, resident, and the general public risks and harms from de-energization” and clearly explain risk models and risk assessment processes (284).

SCE failed to provide any explanation for its notification failures in the September 29-30, October 11-12, October 15-16, October 22, and November 21-22 Post Event Reports (286), and did not provide any way to correct the failures for the June 14 and October 16-18 events.

SCE provided inaccurate public safety partner geospatial information due to the tabular format data not matching the graphic format for the Post Event Reports on the September 29-30, October 11-12, October 15-16, October 16-18, October 22, November 21-22, and November 24-26 events (289).

For the Post Event Reports submitted for the events on June 14, September 29-30, October 11-12, October 15-16, and October 16-18, SCE failed to report whether a different form of communication was preferred by any entity invited to the utility’s Emergency Operations Center (289).

In none of the Post Event Reports submitted did SCE present a threshold examination description for the de-energization (305-306).

Violation of D. 21-06-034

Notifications

For the following events, SCE did not send out cancellation notices within two hours of the decision to cancel the de-energization event (Appendix A at A11).

Table 5

Event	Cancellation Notice	Counts	Explanation
Oct. 11 – 12	Critical facilities	127	Not provided
	Customers	32	Not provided
Oct. 15 – 16	Critical facilities	4	Not provided
	Customers	11	Not provided
Nov. 21	Critical facilities	486	Not provided
	Customers	10,086	Miscommunication between operations/notifications teams.
Nov. 24	Critical facilities	797	Internal missed communication
	Customers	44,174	Internal missed communication

Reporting Template Violations

Additional reporting requirements are also included in the reporting template for the Post Event Report. For the October 22 event, SCE did not include a zipped geodatabase file that includes PSPS event polygons of de-energized areas or event damage and hazard points (4-6). For the October 22 event, November 21-22 event, and November 24-26 event, SCE did not report the positive notifications to MBL customers behind the meters. For the October 22 event, SCE did not report the number of positive notifications made to Self-Certified Vulnerable customer.

Please advise me no later than May 7, 2023, of corrective measures taken by SCE to remedy and prevent the future recurrence of the identified violations, or provide additional data that refutes the violations detailed in this Notice of Violation. Based on your response, this Notice of Violation may lead to an enforcement action. If you have

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any questions, you can contact Cindy Chen at (415) 660-8312 or email Cindy.Chen@cpuc.ca.gov.

Sincerely,



Ronald DeMayo

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