

COUNTY OF EL DORADO

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July 19, 2022

President Alice Reynolds
California Public Utilities Commission
505 Van ness Avenue
San Francisco, CA 94102
public.advisor@cpuc.ca.gov

Subject: Support for Motion for rules and requirements on Fast-Trip Programs

Dear President Reynolds,

The County of El Dorado writes the California Public Utilities Commission (Commission) to express its support for the motion submitted by Pioneer Community Energy, Sonoma Clean Power, East Bay Community Energy, Marin Clean Energy, and Rural County Representatives of California (“Joint Parties”) requesting that the Commission open an expedited phase or track of the De-Energization Rulemaking to consider rules, expanded reporting requirements, and common program-related terms for all investor-owned utilities’ (“IOUs”) Fast-Trip Programs.

Between July and October 2021, El Dorado County experienced 37 EPSS outages, with durations ranging from hours to days. One circuit in particular – Placerville 2016 circuit – experienced more than 4 million minutes of customer outage the week of September 6 to 12, 2021. The Apple Hill 2102 circuit experienced an outage that started August 17 and lasted until August 29 with 856 customers experiencing a sustained outage. The outages on the various circuits in El Dorado County affected an elementary school, which lost eight days of instruction, and a local hospital.

Phone calls from residents are coming in as 2022 seems to be a repeat of 2021. There has been no communication from PG&E to residents about an increase in sensitivity of the Fast-Trip Switches, which results in unexpected, frequent power shut-offs. Residents in Somerset report that the power went off unexpectedly, without notice, 4 or 5 times within a few days, during the first week of July when the temperatures were nearing 100 degrees outside. Those residents couldn’t use their fans, didn’t have well water, and couldn’t keep their cell phones charged in case of an emergency. There was no notice to them or to County officials that the Fast Trip Switch settings were increasing and making the switches more sensitive and likely to

shut off. One woman didn't know how to plan her father's memorial service with her family at her house because of the unreliability of the electric service.

It is concerning that PG&E has reported that El Dorado County has experienced 3 or 4 Fast-Trip Switch outages daily for several weeks this year without any notification to residents or County representatives. How are residents and the County to prepare for frequent, unplanned outages without any communication or support from PG&E?

Fast Trip Programs are IOU programs intended to reduce wildfire risk by significantly increasing the sensitivity of protective devices and equipment that trigger automatic outages. Current Fast-Trip Programs include PG&E's *Enhanced Powerline Safety Settings* ("EPSS") program, Southern California Edison's ("SCE") *Fast Curve Settings* ("FCS"), and San Diego Gas & Electric ("SDG&E") refers to this program as fast protection settings.

We understand and support the use of wildfire risk reduction programs and equipment settings to prevent incidents like the Dixie Fire, Camp Fire, and others. At the same time, we frequently experience the dislocation caused by the sudden loss of power (whether from a PSPS or a Fast Trip outage) and recognize the public safety and welfare challenges they create. Furthermore, the frequency with which some residents and communities experience Fast Trip outages is unacceptable without utilities taking proactive steps to quickly harden and improve the impacted infrastructure to prevent future outages. We are concerned that this Fast Trip program that poses a significant threat to the health and welfare of our constituents due to frequent interruptions of electric service is being executed without an adequate level of review or oversight by the CPUC.

Under the De-Energization Proceeding, the Commission developed extensive rules governing the conduct, mitigation, restoration, and reporting associated with PSPS events. Fast Trip events create the same types of potentially disastrous impacts those residents affected (and are often occurring as a mitigation tool to reduce the frequency and extent of PSPS events), but the Commission has no formal policies or procedures in place for these Fast-Trip-related outages.

For these reasons, we strongly recommend the Commission approve the motion submitted by the Joint Parties.

Respectfully,

Supervisor Lori Parlin
Chair, Board of Supervisors