

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding  
Emergency Disaster Relief Program

Rulemaking 18-03-011

**COMMENTS OF THE CALIFORNIA FIRE CHIEFS ASSOCIATION  
ON THE PROPOSED DECISION OF COMMISSIONER BATJER**

July 1, 2020

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ON THE PROPOSED DECISION OF COMMISSIONER BATJER**

Pursuant to Rules 14.3 and 14.6 of the Commission's Rules of Practice and Procedure, in Proceeding R.18-03-011, the **Order Instituting Rulemaking Regarding Emergency Disaster Relief Program**, the California Fire Chiefs Association (CFCA), provides these *Comments of the California Fire Chiefs Association on the Proposed Decision of Commissioner Batjer*.

The public safety community is facing challenges we could not have predicted a year ago. Local first responders face force reductions due to the worst budget climate in more than a decade. Firefighting and evacuations will be more difficult due to the COVID-19 pandemic. Dramatically complicating our efforts to respond to these unforeseen events is the now all-to-common challenge of widespread Public Safety Power Shutoffs, which last year, impacted dozens of counties and millions of consumers.

As we enter peak wildfire fire season, we believe it is critical to prioritize backup power for emergency responder facilities and people evacuating during wildfires; deploy all useful assets, including on-site, mobile and multiple energy technologies; and reduce the frequency, size, and duration of power shutoffs themselves, as the best way to mitigate the risks they pose.

We understand that power shutoffs can be a necessary evil to prevent fires, but they should not be allowed to become an ongoing policy of choice. Power shutoffs create a downstream public safety risk, disrupting hospitals, transportation, communications and state and local public safety operations.

Thank you for your leadership in developing the CPUC's Proposed Decision on Wireless Provider Resiliency Strategies. As the proposal comes to a full vote at the Commission

and you explore next steps to mitigate the impact of PSPS events, we are writing to offer a public safety perspective.

**Keep all options on the table to keep communities connected and ensure public transparency.**

As many parties have noted, as long as communication services remain operational, the goal has been met. There are multiple ways to meet this goal and allowing multiple ways to meet this goal is critical for public safety. While some parties may support certain energy technologies or have a preference for on-site versus mobile backup power, ultimately what is needed is service continuity and rapid restoral. Practically speaking, we understand that not all technical solutions can be implemented in all areas or on an acceptable timeframe. On-site backup power, while ideal in many cases, cannot be deployed at all sites and certainly not universally in a timely manner. Similarly, while clean energy backup power solutions are ultimately necessary, widespread deployment of these solutions is not possible or practical at scale. During a crisis every useful solution, whether fixed or mobile, must be deployed in a strategic manner. At the same time, we support public transparency and accountability so that it is clear whether the goal of keeping the public connected during wildfires and power shutoffs has been achieved.

**Prioritize emergency communications that will support first responders and people evacuating during wildfires.**

We understand that a separate decision on wireline resiliency may be forthcoming, and we urge the Commission to focus on the most urgent communications needs for public safety. The Commission should consider questions, such as *What are the needs of an emergency dispatch center issuing and updating instructions to an evacuating public during a wildfire?* As many parties have noted, ensuring that wireless facilities, fire stations, police stations, hospitals, and emergency command and dispatch centers in Tier 2 and 3 High Fire-Threat Districts remain connected during power outages is critical. We are encouraged that a number of parties support a framework that prioritizes these emergency communications.

**Aggressively reduce the scope and frequency of power shutoffs – do not allow power shutoffs to become the policy of choice.**

Backup power arrangements for the downstream users of commercial power is at best a stopgap. There is no real substitute for commercial power and no practical way to arrange backup power for the countless essential critical equipment types and services consumers need, including dialysis machines, wheelchairs, and pharmaceutical refrigeration. For each consumer service addressed in your proposal there are dozens, if not hundreds, of essential services that remain unprotected. The Commission is responsible for ensuring that safe and reliable commercial power is restored. Holding to an aggressive schedule for reducing the fire risk posed by the power grid, including upgrading failure-prone transmission and distribution equipment, comprehensive vegetation management and active monitoring in high-risk areas, must remain the highest priority.

California has already experienced 60 percent more wildfires between January 1 and May 10 of this year compared to last year. Staying focused on the specific emergency communications needed during wildfires and being ready to deploy an array of assets, is an important next step in our readiness.

Thank you for the opportunity to provide this feedback.

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Respectfully Submitted,



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