

May 8, 2023

VIA EMAIL ONLY

Ronald DeMayo
Program and Project Supervisor
Wildfire Safety and Enforcement Branch – PSPS Section
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298
Ronald.DeMayo@cpuc.ca.gov

Re: PacifiCorp's Response Regarding Notice of Violation – PacifiCorp 2021 Public Safety Power Shutoff Event

Dear Mr. DeMayo:

PacifiCorp respectfully submits this response to your April 7, 2023, Notice of Violation regarding PacifiCorp's 2021 Public Safety Power Shutoff Event.

Please direct any question regarding this submission to Pooja Kishore, Regulatory Affairs Manager at californiadockets@pacificorp.com and pooja.kishore@pacificorp.com.

Sincerely,



Allen Berreth
Pacific Power Vice President of Operations
Allen.Berreth@pacifiCorp.com

cc:

Lee Palmer, Director, Safety and Enforcement Division CPUC, Leslie.Palmer@cpuc.ca.gov
Anthony Noll, SED Program Manager, Anthony.Noll@cpuc.ca.gov
Cindy Chen, Senior Public Utilities Regulatory Analyst, WSEB, SED, CPUC,
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Introduction

On April 7, 2023, PacifiCorp received a Notice of Violation (Notice) from the California Public Utilities Commission related to PacifiCorp’s 2021 Public Safety Power Shutoff event. The Notice included two violations related to Decision (D.) 19-05-042 and one related to D.20-05-051. The response below provides corrective measures to remedy and prevent future recurrence of violations. The tables embedded in the responses below are from [PacifiCorp’s August 17, 2021 PSPS Post-Event Report – Submitted August 31, 2023 \(2021 PSPS Post-Event Report\)](#).¹ The violations and responses are summarized below:

Violations of D.19-05-042

Customer Notification Violations

- a) *In D.19-05-042, the Commission set forth a number of notification requirements to ensure customers would be informed prior to a de-energization event. Over the course of our evaluation, WSEB was unable to determine if PacifiCorp properly notified customers when re-energization began. 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.” (A8). PacifiCorp only reported that “several” notifications did not get made as re-energization began because of system overload. Without information specifying how many customers did not receive a notification, WSEB must assume that none of the customers received them.*

PacifiCorp Response

PacifiCorp initiated notifications as indicated in the table below. In addition to telephone calls, PacifiCorp also initiated text and email messages to augment the telephone calls. Regarding restoration notifications, PacifiCorp initiated 1,953 telephone calls, 1,918 text messages and 1,035 emails utilizing all communication methods provided by customers. Due to an unanticipated system overload with PacifiCorp’s vendor, 1,753 outbound calls failed. The failed calls were not identified until the morning of August 18, 2021, after successful event conclusion notifications were complete. PacifiCorp cancelled the pending notifications given the successful event conclusion notifications, and in an effort to not cause any confusion to customers.

Table 8: Customer Notification Summary Table

August 17, 2021 De-Energization Event						
Type of Notification	Date	Time	Total Notifications Initiated			
			Total	Phone	Text	Email
PSPS Watch	8/16/2021	17:09:00	3,014	1,953	26	1,035
De-Energization	8/17/2021	15:35:00	2,988	1,953	0	1,035
Restoration	8/17/2021	21:12:00	4,914	1,953	1,926	1,035
Event Over	8/18/2021	8:29:00	4,906	1,953	1,918	1,035
Total	-	-	15,822	7,812	3,870	4,140

¹ PacifiCorp’s August 31, 2021 Post-event Report, https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/outages-safety/wildfire-safety/california-reports/18-10-007_R18-12-005_PAC_PSPS_Report_8-31-21.pdf

Since this incident, PacifiCorp has started phase the outbound call rate and has implemented an error checking process, and enhanced vendor and internal Customer Service staffing to ensure notifications are completed timely.

- b) *Additionally, D.19-05-042 requires advance notification 48-72 hours to public safety partners and 1-4 hours to customers prior to a de-energization (D.19-05-042, A8). PacifiCorp did not meet either requirement.*

PacifiCorp Response

Due to the rapidly changing weather and environmental conditions, not all planned notifications were initiated. The risk event was initially forecasted on August 16, 2021, not allowing for a 48–72-hour notification. Additionally, the impact winds developed earlier than forecast during the afternoon of August 17, 2021, which required the acceleration of the de-energization from around 5:00 p.m. to just after 3:30 p.m. PacifiCorp had not initiated the 1–4-hour notification at the time the decision to de-energize was made. This was due to early arrival of impact winds. As a result, PacifiCorp will consider initiation of “de-energization imminent” calls closer to the four hour mark where feasible. There were four notifications completed during the event as outlined in the table below.

Table 10: Notification Timeline Summary

August 17, 2021 De-Energization Event			
Notice	Type of Notification	Approximate Date / Time	Implemented According to Plan
48-72 hours	De-energization Warning to Public Safety Partners / Priority Customers	-	<i>[not possible due to rapidly changing forecast]</i>
24-48 hours	De-energization Warning	August 16, 2021 5:09 PM	✓
1-4 Hours ⁶	De-energization Imminent	-	<i>[not possible due to rapidly changing real time events]</i>
Event Begins	De-energization Begins	August 17, 2021 3:35 PM	✓
As Re-energization Begins	Re-energization Begins	August 17, 2021 9:12 PM	See Section 5.4
Once Re-energization is Completed	Re-energization Completed	August 18, 2021 8:29 AM	✓
Cancellation of Event	De-energization Event Canceled	N/A	N/A

In addition, PacifiCorp has made great progress in situational awareness and weather forecasting tools. These advancements will help PacifiCorp better understand and respond to threat and risk with a greater lead time.

PacifiCorp made a significant advancement in our weather prediction capability. In August of 2021, PacifiCorp’s meteorology team was reliant on National Oceanic and Atmospheric Administration’s High

Resolution Rapid Refresh model that provides weather forecasts for 48 hours. PacifiCorp then implemented a high-resolution numerical weather prediction model providing weather forecasts for 96 hours.

PacifiCorp bolstered the weather station network increasing real-time situational awareness capabilities. When the PSPS was enacted, PacifiCorp had 21 weather stations in California. PacifiCorp has installed an additional 55 weather stations in California with plans to install another 30 by the end of 2023. PacifiCorp's weather stations can make 30-second weather observations, allowing for precise real-time decision-making.

PacifiCorp developed and implemented a PSPS decision-support dashboard. This dashboard combines real-time weather data from numerous weather station networks with wind thresholds used for PSPS decision-making. This dashboard aggregates data that allows for situational awareness across the entire service territory.

PacifiCorp collaborated with a vendor to bolster an existing weather situational awareness website that combines real-time weather observations and numerical weather prediction data from multiple sources including PacifiCorp's weather prediction model data. The PSPS decision-making and notification process requires a comparison of wind predictions with real-time observations, to understand whether event timing may be impacted.

- c) *PacifiCorp failed to notify Critical Facilities and customers of the estimated start time, duration, and estimated time to full restoration of the events (D.19-05-042, A16, A22-23).*

PacifiCorp Response

PacifiCorp recognizes the feedback of Public Safety and Communications partners that notifications did not meet expectations. The Company conducted notifications to critical facilities leveraging internal communication mechanisms and Siskiyou County Emergency Management contacts using a variety of methods as described in Section 5.1, p 15. Additional details on these notifications can be found on Appendix B – Notification to Critical Facilities, on p 36 and Appendix F – Notifications to CPUC on p51 of the [2021 PSPS Post-Event Report, pp. 8-9](#). These notifications did not meet expectations and PacifiCorp has worked to improve a number of key data points, improve communication processes, improve staffing availability and coordination and to develop and leverage the data integrity and improved communication the Public Safety Portal will offer these partners.

Post Event Report

- d) *Additionally, the Commission requires utilities to submit a post event report for each PSPS event. D.19-05-042 requires that a link to the report be included on the utilities website with contact information to submit comments (A22). PacifiCorp's service of the de-energization report did not include a link to the report on PacifiCorp's website and contact information to submit comments. In the report, PacifiCorp failed to evaluate the engagement with local and state public safety partners in providing advanced education, outreach, and notification during the events (D.19-05-042, A22-23).*

PacifiCorp Response

PacifiCorp will submit, serve, post on its website and provide contact information for post-event reports for future de-energization events, as required by ESRB-8 and D.19-05-042.

- e) *The Commission requires the electric investor-owned utilities provide the decision criteria leading to de-energization (D.19-05-042, A22- A23). PacifiCorp did not report the specific criteria leading to the de-energization event.*

PacifiCorp Response

On August 17, 2021, PacifiCorp made the decision to implement a PSPS based on a thorough assessment of outage risk and environmental risk. Both risk assessments showed an environment with a high potential for large and rapidly spreading wildfire and wind conditions that typically lead to outages in the area. A summary of the criteria used for decision-making are presented in [2021 PSPS Post-Event Report, pp. 8-9](#).

Violations of D.20-05-051

Post Event Report

- f) *Further post event report requirements are set out by the Commission in D.20-05-051. (Appendix A at 4). PacifiCorp did not explain why it missed notifications before re-energization. It also did not report sufficient quantitative information including the specific criteria leading to de-energization as required in Appendix A, page 9.*

PacifiCorp Response

In [the 2021 PSPS Post-Event Report, Section 5.4](#), p.18, , PacifiCorp acknowledges the missed notifications for customers and discusses the cause of the missed restoration notifications. As a result, PacifiCorp outlined three improvements in the following Section 5.5, p 18:

1. Upon activation of the EOC, PacifiCorp has arranged with the vendor that manages the external notification system to place emergency technical support on call to meet notification requirements and troubleshoot any errors in real time throughout the duration of the event.
2. PacifiCorp has increased education for call center personnel to recognize these types of errors and establish processes to make corrections in a timely manner.
3. PacifiCorp has implemented new steps in PSPS protocols that include internal staff verifying success of vendor notifications very shortly after communications to customers are initiated.

Regarding quantitative information including specific criteria leading to de-energization as required, PacifiCorp initiates a PSPS when winds reach the 95th percentile for weather stations on or in proximity to circuits identified as having extreme wildfire risk. At the time of de-energization, PacifiCorp's weather station PC006 just south of Dunsmuir had a wind gust 95th percentile of 25 mph, and winds were measured at 28 mph. Additional supporting observations included a measured wind gust of 54 mph by the PacifiCorp weather station PC062C that was deployed for the event on a ridge northeast of Dunsmuir, a measurement of 40 mph by a field observer at Castle Crag State Park, and field observations of airborne vegetative debris during strong wind gusts. These quantitative and qualitative factors substantiated the implementation of the PSPS to ensure the safety of the public.