

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

Order Instituting Rulemaking Regarding
Microgrids Pursuant to Senate Bill 1339 and
Resiliency Strategies

Rulemaking 19-09-009
(Filed September 12, 2019)

**COMMENTS OF CTIA ON INVESTOR OWNED UTILITIES'
RESILIENCY STRATEGIES AND PROPOSALS**

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In accord with the Assigned Commissioner’s Scoping Memo and Ruling for Track 1 and the January 21, 2020 Administrative Law Judge’s Ruling, CTIA¹ comments on the resiliency strategies and proposals of Pacific Gas and Electric Company (“PG&E”), Southern California Edison Company (“SCE”) and San Diego Gas & Electric Company (“SDG&E”) (collectively, the Investor Owned Utilities or “IOUs”) filed in the above captioned proceeding on January 21, 2020.

I. INTRODUCTION

The Scoping Memo issued in this proceeding on December 20, 2019 frames Track 1’s objective as the “deploy[ment] of resiliency planning in areas that are prone to outage events and wildfires, with the goal of putting some microgrid and other resiliency strategies in place by Spring or Summer 2020, if not sooner.”² Through such deployment, the California Public

¹ CTIA – The Wireless Association® (“CTIA”) (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association’s members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

² Assigned Commissioner’s Scoping Memo and Ruling for Track 1, R. 19-09-009 (December 20, 2019) (“Scoping Memo”), p. 3.

Utilities Commission (“Commission”) expects that public impacts of public safety power shutoffs (“PSPS”) or catastrophic events can be mitigated.³ To this end, the January 21, 2020 filings of the IOUs set forth a myriad of resiliency strategies and proposals, including the creation of microgrids (both permanent and temporary), the provision of backup power to strategic locations, and additional sectionalizing or reconfiguration of circuits. The stated purpose of each of these endeavors is to reduce the frequency of PSPS events and/or reduce the number of customers impacted during those events.⁴

CTIA and its member carriers are highly supportive of efforts taken by the IOUs to reduce the frequency and narrow the footprint of PSPS events, thereby reducing the number of customers negatively impacted. Wireless carriers look forward to continuing to work with IOUs to mitigate the impact of future outages, including PSPS events.

CTIA notes, however, that the issue of PSPS event mitigation is being evaluated by the Commission in multiple proceedings.⁵ Of particular import is the Commission’s goal in Phase 2 of R. 18-03-001, which is to ensure a “resilient and dependable communications network that aids first responders and allows the public to communicate in a reliable manner during disasters or public safety power shut offs.”⁶ As addressed below, it is imperative that these various proceedings function in concert to produce a cohesive plan that will mitigate, to the greatest

³ *Id.*, p. 2.

⁴ *See, e.g.*, Track 1 Proposal of Pacific Gas and Electric Company Addressing Immediate Resiliency Strategies for Outages, R.19-09-009 (January 21, 2020), p. 4; Southern California Edison Company’s Resiliency Proposal and Response to Administrative Law Judge’s Rulings, R.19-09-009 (January 21, 2020), p.2.

⁵ *See, e.g.*, R. 18-11-05, Order Instituting Rulemaking to Examine Electric Utility De-energization of Power Lines in Dangerous Conditions; R. 18-03-011, Order Instituting Rulemaking Regarding Emergency Disaster Relief Program, Phase 2.

⁶ Decision 19-08-025, p. 47.

extent possible, the negative impacts to public health and safety that may result from PSPS events.

II. THE IOUS' RESILIENCY PROPOSALS SHOULD ADDRESS COORDINATION WITH COMMUNICATIONS CARRIERS REGARDING THEIR CRITICAL INFRASTRUCTURE

The IOUs' submissions detail the various criteria utilized to determine what they believe to be the most advantageous locations for microgrids or for the deployment of temporary measures to safely reduce the scope of PSPS events. It is the Commission's role to determine the efficacy of these proposals for mitigating the negative impact to public health and safety that may result from such events to the greatest extent achievable. In this regard, the Commission stated that, in assessing the IOUs' proposed resiliency strategies, it "will be considering, but not be limited to, the following elements for *key sites and locations*: (1) customers with access and functional needs; (2) medical baseline customers; (3) police stations; (4) fire stations; (5) schools (e.g., educational facilities); (6) water and waste water facilities; (7) community centers; (8) senior centers; and (9) disadvantaged and hard to reach communities."⁷ However, this list of "key sites and locations" deviates from the list of "critical facilities" that the Commission established in Decision 19-05-042 issued in the de-energization (PSPS) docket.

In Decision 19-05-042, the Commission determined that "the term 'critical facilities' and 'critical infrastructure' refers to facilities and infrastructure that are essential to the public safety and that require additional assistance and advance planning to ensure resiliency during de-energization events...."⁸ In conjunction with this definition, the Commission adopted an interim list of critical facilities/infrastructure that includes: "[c]ommunication carrier infrastructure

⁷ Scoping Memo, p. 3 (emphasis added).

⁸ Decision 19-05-042, p.75.

including selective routers, central offices, head ends, cellular switches, remote terminals and cellular sites.”⁹

As noted above, the Scoping Memo indicated that “key sites and locations” include those it listed, “but [will] not be limited to” them.¹⁰ Accordingly, CTIA suggests that the definition of “key sites and locations” in the Scoping Memo be clarified to include communications infrastructure that the Commission has declared critical facilities or infrastructure. The industry is not aware of any reason why communication infrastructure should be excluded from the definition of “key sites and locations” for the purpose of consideration of the IOUs’ resiliency strategies in this docket.

In this regard, CTIA notes that with the exception of SDG&E’s filing, the IOUs’ submissions are presently devoid of any mention of communications facilities. The Commission should remedy this omission.

The wireless industry is eager to engage with the IOUs to discuss how and in what situations it is most advantageous to include communications infrastructure, such as wireless facilities, in the IOUs’ resiliency strategies. The wireless industry views the incorporation of communications infrastructure within the footprint of planned microgrids to be of one of many avenues that should be explored in the context of ensuring resilient and dependable wireless networks during PSPS events. To this end, CTIA supports SDG&E’s proposal to fashion a program to “[w]ork with critical services providers, such as water agencies and communication

⁹ *Id.*, p. 76.

¹⁰ Scoping Memo, p. 3.

providers, to identify solutions that can enhance their resiliency efforts,”¹¹ and submits that each of the IOUs should be required to incorporate similar plans into their resiliency proposals.

III. CONCLUSION

As noted above, the Commission is seeking to ensure a “resilient and dependable communications network that aids first responders and allows the public to communicate in a reliable manner during disasters or public safety power shut offs.”¹² Incorporation of key communications infrastructure into planned microgrids is one solution among many possible options to facilitate such an objective. The Commission should ensure that the resiliency plans for each IOU contain a commitment to engage with critical infrastructure operators, such as wireless carriers, with the goal of incorporating critical infrastructure within the footprint of planned permanent or temporary microgrids, to the extent feasible.

Respectfully submitted this January 30, 2020, at San Francisco, California.

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¹¹ Response of San Diego Gas & Electric Company with Proposal Requested by Scoping Memo and Information Requested by ALJ Ruling, R. 19-09-009 (January 21, 2020), p.19.

¹² Decision 19-08-025, p. 47.