

**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 PROPOSED DECISION  
ADOPTING SHORT-TERM ACTIONS TO ACCELERATE  
MICROGRID DEPLOYMENT AND RELATED RESILIENCY SOLUTIONS**

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In accord with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), CTIA comments on the *Proposed Decision Adopting Short-Term Actions to Accelerate Microgrid Deployment and Related Resiliency Solutions* issued in the above captioned proceeding on April 29, 2020 (“Proposed Decision”).

**I. INTRODUCTION**

CTIA commends the Commission for exploring innovative measures to improve the reliability of electric service and maintain uninterrupted commercial power for customers during public safety power shutoff (“PSPS”) events. Widespread loss of commercial power, as was experienced last year, puts a strain on Californians, adversely impacting education, commerce, and public safety. Unfortunately, the Proposed Decision errs by failing to require investor owned utilities (“IOUs”) to modify their resiliency proposals to include commitments to engage with communications providers, including wireless carriers, with the goal of incorporating essential communications infrastructure within the footprint of planned permanent or temporary microgrids, to the extent feasible.<sup>1</sup> This deficiency in most IOUs’ plans was raised on the record

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<sup>1</sup> In its Resiliency Proposal, San Diego Gas & Electric Company (“SDG&E”) noted that in its 2020 Wildfire Mitigation Plan it would include several new programs for customers likely to be impacted by PSPS events. One such example is “[w]orking with critical services providers, such as water agencies

of this proceeding by CTIA.<sup>2</sup> In order to rectify this deficiency, CTIA proposed including communications infrastructure in the Commission-determined list of “key sites and locations” that IOUs’ resiliency strategies must consider.<sup>3</sup> In addition, CTIA proposed that with this modification made, the Commission then direct each IOU to amend its resiliency plan to include an affirmative commitment to engage with communications providers.<sup>4</sup> The Proposed Decision does not address either of CTIA’s proposals.<sup>5</sup>

It is vital that the Commission ensure that the proposed means to mitigate the impacts of PSPS events function in concert across multiple industries in order to produce a cohesive plan that will mitigate, to the greatest extent possible, the negative impacts to public health and safety that may result from those events. Given that PSPS events are initiated voluntarily by IOUs, the IOUs should be required to discuss with communications providers the inclusion of communications critical infrastructure, including wireless infrastructure, in their microgrid plans. Failure to require such joint planning simply perpetuates fragmented PSPS mitigation strategies to the detriment of California consumers.

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and *communication providers*, to identify solutions that can enhance their resiliency efforts. To this end, SDG&E will work with critical services providers serving customers in the [high fire threat district] to identify solutions and best practices.” *See Response of San Diego Gas & Electric Company With Proposal Requested a by Scoping Memo and Information Requested by Scoping by ALJ Ruling*, R. 19-09-009 (January 21, 2020), p. 19 (emphasis added). While CTIA welcomes this effort, it should be memorialized as part of SDG&E’s Commission-adopted resiliency plans and proposals.

<sup>2</sup> *Comments of CTIA on Investor Owned Utilities’ Resiliency Strategies and Proposals*, R.19-09-009 (January 30, 2020) (“CTIA Comments”).

<sup>3</sup> *Id.*, pp. 3-4.

<sup>4</sup> *Id.*, pp. 4-5.

<sup>5</sup> The PD erroneously interprets CTIA’s comments as support for SDG&E’s EV Cameron Corners Microgrid and local area distribution controller. *See Proposed Decision*, pp. 78-79. CTIA’s comments did not address this aspect of SDG&E’s filing, but rather noted with favor SDG&E’s contemplated program to work with communications providers as referenced in footnote 1, *supra*.

The Proposed Decision should be modified to amend the definition of “key sites and locations” to include communications infrastructure and to direct IOUs to engage with facilities-based communications carriers for the purpose of identifying the need and feasibility of including their facilities within the footprint of temporary or permanent microgrids. This will help ensure the continuity of both electric and communication services during PSPS events.

## **II. THE COMMISSION SHOULD FACILITATE A HOLISTIC APPROACH TO POLICYMAKING TO MITIGATE THE IMPACTS OF PSPS EVENTS**

The Scoping Memo in this OIR provides that Track 1 of this proceeding “encompasses the Commission’s goal of deploying 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.”<sup>6</sup> The purpose of such endeavor is to mitigate the impact of power outages due to public safety power shutoffs and other causes. In this regard, the Scoping Memo was very clear that in assessing the IOUs’ proposed resiliency strategies the Commission “will be considering, but not be limited to, [certain] elements for key sites and locations....”<sup>7</sup> As referenced above, CTIA proposed including communications infrastructure in the Commission-determined list of “key sites and locations” that IOUs’ resiliency strategies must consider. CTIA pointed out that such a modification is consistent with the Commission’s determination in D.19-05-042 that communication carrier infrastructure is considered critical infrastructure -- *i.e.*, “facilities and infrastructure that are essential to the public safety and that require additional assistance and advance planning *to ensure resiliency* during de-energization

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<sup>6</sup> *Assigned Commissioner’s Scoping Memo for Track 1*, R. 19-09-009 (December 20, 2020) (“Scoping Memo”), p. 3.

<sup>7</sup> *Id.*, p.3. Key sites and locations were defined to include (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. *Id.*

events....”<sup>8</sup> Thus, resiliency planning in areas that are prone to outage events and wildfires should account for maintaining uninterrupted commercial power to communications infrastructure. The Proposed Decision does not address CTIA’s request to amend the definition of key sites and locations, and does not direct IOUs to amend their respective resiliency plans to incorporate coordination with communications providers as part of their microgrid planning.

The clear goal of this proceeding is to devise resiliency strategies that ensure, to the extent feasible, operational continuity of facilities and infrastructure that are essential to public safety during a PSPS event. In order to meet this goal, the Commission must facilitate a more holistic approach to mitigating the impacts of PSPS events. At minimum, this requires greater coordination on the part of the IOUs with all critical industries impacted by shutoffs, including the wireless industry. Such coordination could potentially reduce the adverse impacts of PSPS events for consumers and businesses alike. Incorporation of critical communications infrastructure within the footprint of planned microgrids, to the extent feasible, is an efficient avenue to help ensure resilient and dependable wireless networks during PSPS events. The Commission’s consideration of microgrids, as well as other strategies to mitigate the scope and impact of potential future PSPS events, should include the steps necessary to ensure that the IOUs consider the impact of PSPS events on all critical infrastructure providers.

### **III. CONCLUSION**

The Proposed Decision should be modified to both amend the definition of “key sites and locations” to include communications infrastructure and to direct IOUs to engage with facilities-based telecommunications carriers for the purpose of identifying the need and feasibility of

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<sup>8</sup> CTIA Comments, p. 3 (citing D.19-05-042, p.75) (emphasis added).

deploying temporary or permanent microgrids to ensure the continuity of both electric and communication services during PSPS events.

Respectfully submitted this May 19, 2020, at San Francisco, California.

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