

**A REPORT BY
THE 2019-2020 CONTRA COSTA COUNTY GRAND JURY**

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Report 2005

Public Safety Power Shutoff

Is Contra Costa County Prepared?

APPROVED BY THE GRAND JURY

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JUDGE OF THE SUPERIOR COURT

Contra Costa County Grand Jury Report 2005

Public Safety Power Shutoff

Is Contra Costa County Prepared?

**TO: Contra Costa County Board of Supervisors
Contra Costa County Office of the Sheriff**

SUMMARY

In 2018, Pacific Gas and Electric (PG&E) instituted a Public Safety Power Shutoff (PSPS) program whereby power is proactively shut off under certain circumstances in areas of elevated or extreme wildfire threat. Contra Costa County (the County) has regions designated by the California Public Utilities Commission (CPUC) as having an elevated or extreme fire threat that may be impacted by a PSPS event. As the Grand Jury's investigation progressed, two PG&E-initiated PSPS events occurred. The County response to those events is also discussed in this report.

The Grand Jury found that the degree of planning across County departments showed considerable variation. There was no coordinated approach or template to provide the departments with a basis for PSPS planning. Of those County departments providing information to the Grand Jury, four had PSPS plans in draft form. Some had consulted with PG&E during the preparation of those drafts. Other departments initially planned to operate during a PSPS event using their existing Emergency Operations Plans. Those plans are similar to earthquake response plans except that a PSPS event has some warning and may last for a longer period.

During the October 9, 2019, PSPS event, Contra Costa Health Services (CCHS) did not have PG&E's complete information on residents who would be medically at-risk during a loss of power. Medically at-risk residents rely on electricity for conditions requiring oxygen, ventilation assistance, refrigeration of medications, or a Continuous Positive Airway Pressure (CPAP) device. According to interviews and responses to Requests for Information, the lack of communication delayed notifications to the affected residents. The loss of cellular phone and internet/cable services during the power outages negatively impacted the County's ability to contact at-risk residents and compromised communication to fire evacuees and first responders.

Staffing depth in some departments was not adequate given the length of the PSPS events. In some cases, the pre-positioning of emergency power generation capacity was not sufficient to provide backup for essential facilities. As of the completion of this investigation, the County's After-Action Report (critique of operations) for the two events had not been made available to the Grand Jury nor had the full fiscal impact on the County been reported.

The Grand Jury recommends that the County consider developing a comprehensive plan of County departments' interaction and resources needed to address future PSPS events. The Jury recommends that the County work with PG&E to improve communication during a PSPS outage (in particular, the identification of residents medically at-risk) and to establish alternative means of communicating to residents who have lost telephone and internet service.

If the County creates After-Action Reports for a PSPS event, the Grand Jury recommends that the County consider completing final After-Action Reports in an expeditious manner.

METHODOLOGY

The Grand Jury used the following investigative methods:

- Reviewed County department draft PSPS plans
- Interviewed County departments
- Sent Requests for Information to County departments and reviewed their responses
- Completed PSPS-focused interviews with city and fire district personnel
- Reviewed PG&E reports, plans, and announcements
- Reviewed California Public Utilities Commission PSPS reports

CONFLICT of INTEREST DISCLAIMER

One or more jurors recused themselves from this investigation due to possible conflict of interest and did not participate in the investigation, preparation, or approval of this report.

BACKGROUND

A PSPS event is unique in that PG&E has sole discretion to initiate the action. It is not a random occurrence such as an earthquake, other natural disaster, or terrorism event. Power can be shut off for more than five days. The process of initiating an event is

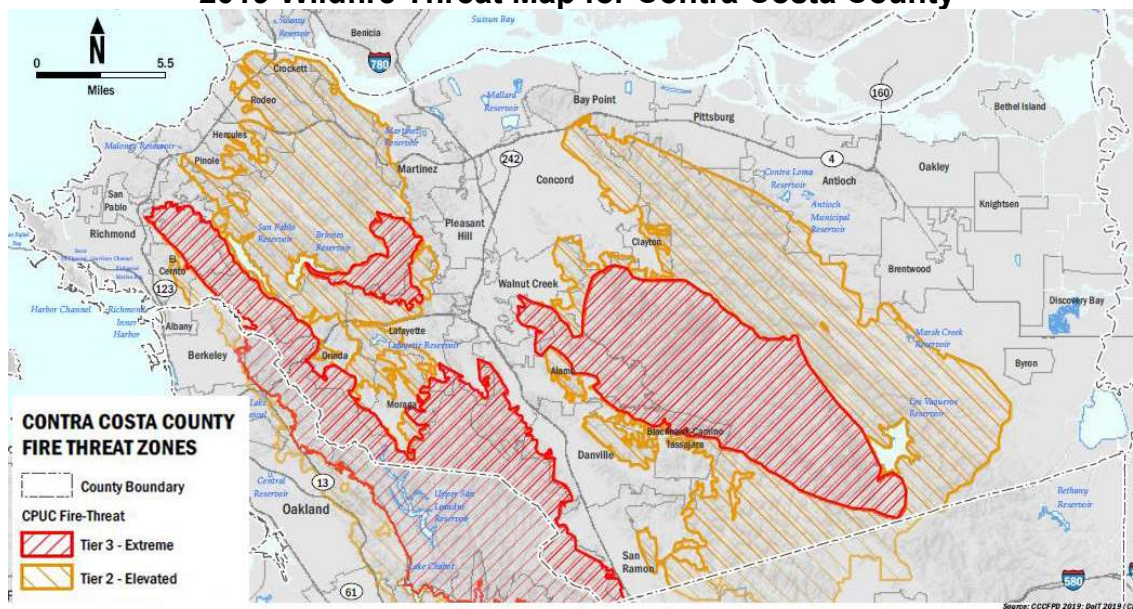
based on PG&E's assessment of wildfire threat across its service area and its decision to turn off potentially at-risk electrical power lines as a preventative measure. Factors that PG&E considers are:

- Red Flag Warning: It is a forecast warning issued by the National Weather Service in the United States to inform the public, firefighters, and land management agencies that conditions are ideal for wildland fire combustion and rapid spread. To the public, a Red Flag Warning means high fire danger with increased probability of a quickly spreading vegetation fire in the area within 24 hours.
- Low humidity levels
- Forecasted sustained winds generally above 25 miles per hour and wind gusts in excess of 45 miles per hour
- Condition of dry fuel
- On-the-ground real-time observations

Until PG&E initiates an event, there is uncertainty as to which areas will be impacted by a PSPS. PG&E plans include notification of local government agencies about PSPS events 24 to 48 hours in advance of a shutoff, but it may give less warning.

PG&E began implementing PSPS events in 2018 but Contra Costa County was not included in those shutoffs. Parts of the County designated as elevated or extreme fire danger areas are indicated in the following map prepared by the Contra Costa County Fire Protection District based on CPUC wildfire threat information.

2019 Wildfire Threat Map for Contra Costa County



PG&E defines potentially impacted areas as follows:

- Power lines that pass-through areas designated by the CPUC as elevated (Tier 2) or extreme (Tier 3) risk of wildfire. This includes both distribution and transmission lines.
- The specific area and number of affected customers will depend on forecasted weather conditions and which circuits PG&E needs to turn off for public safety.
- Power may be shut off for customers who do not live or work in a high fire-threat area if their community relies on a line that passes through an area experiencing fire danger conditions

Therefore, any customer who relies on electric service from PG&E should be prepared for a possible PSPS outage.

The Grand Jury's investigation considered the following questions as they relate to the impact of a PSPS event on County services considered essential to public health and safety. Specifically:

- Does the County have a Master Plan to outline emergency procedures that can serve as a guide to all County departments in a PSPS event?
- Do individual County departments have their own PSPS plans?
- Which County entity is responsible for coordinating PSPS activities?
- Did County officials coordinate with PG&E relative to County PSPS policies and procedures?
- Has the County evaluated a PSPS event's potential fiscal impact on its essential departments?

As the investigation progressed, the County did have two PSPS events. Events occurred on October 9-11, 2019, and then again on October 26-30, 2019. The Grand Jury investigation of PSPS preparedness occurred prior to, during, and after these PSPS events.

DISCUSSION

PSPS PLANS

The Jury's review of the County's emergency planning for a PSPS event found that the County does have an Operational Area Emergency Plan approved by the Board of Supervisors in 2015. The County Office of Emergency Services (OES) and Contra Costa County Fire Protection District (CCCFPD) have developed supporting plans that can be used for long-term power outages. However, the Grand Jury found no evidence

of a County-coordinated approach or County Master Plan to provide guidance to County departments. Four County departments had PSPS plans in draft form. Some of those departments consulted with PG&E during the development of their plans.

On August 23, 2019, the CCCFPD, in cooperation with the OES, gave a joint presentation to the Board of Supervisors about their plans to respond to wildland fire-related incidents. A portion of that presentation included steps for preparation and action specifically related to PG&E PSPS events. These plans include discussions of the roles and responsibilities of the following County departments: OES, Public Information, Sheriff/Law enforcement, Fire, Health Services/Medical Branch, Employment and Human Services, Public Works, and Logistics.

Every department within the County government has a specific mission. As an example, departments may be tasked with:

- Coordinating and providing health care
- Fire and public safety
- Maintaining roads and buildings
- Animal rescue

However, in planning for PSPS events, various aspects of all plans apply to most of the County's departments. These include:

- Communication
 - Internal (between County departments)
 - Internal (within departments)
 - External (with residents)
 - External (with other governmental entities)
 - Internet, wireless capabilities, and cable service
- Employee staffing and planning, including participation in OES operational calls and meetings, and participation in County Emergency Operations Center (EOC) activity
- Power supply, including back-up options
- Transportation and/or fuel supply
- Public information
- Departmental training, specifically for PSPS events
- Re-energization procedures

The Grand Jury found no evidence that County departments have utilized the OES and CCCFPD plans as a guide or template in order to develop their individual PSPS Preparedness Plans.

The Grand Jury found that most other County departments and cities reviewed initially planned to operate using their Emergency Operations Plans. The plans are similar to those for earthquake response except that a PSPS event has some warning and may last for a longer period of time.

When PG&E initiates a PSPS event, all County emergency operations are coordinated by the OES. Prior to the two 2019 PSPS events, County departments were either establishing plans which are more specific to PSPS events or were modifying current plans.

LEGISLATIVE AND OTHER GOVERNMENT ACTION

Since PG&E initiated the use of PSPS in 2018, there have been several legislative efforts aimed at mitigating the impact of such events on residents, counties, cities, and other governmental organizations. The Jury has identified legislation that impacts the actions that electrical utilities and operators of telecommunications companies are required to take to assist their customers. These customers include: residents, counties, municipalities, and special districts. While some legislation has been signed into law, other legislation is currently being considered. The effect of these laws or bills may be beneficial to the County and its residents.

Existing legislation signed into law October 2, 2019, includes:

- SB 167 requires utilities to submit protocols to CPUC on how they will reduce the impact of planned blackouts on first responders and people who rely on life support equipment.
- SB 560 requires telephone companies to notify utilities and public safety agencies of how a power shutoff could affect their communications grid.

In addition to the above-described legislation which was signed into law, there is pending legislation that contains language specific to regulations that would assist the County with PSPS events in the future. These bills were either in Committee Process or Pending Referral at the time of the completion of this Grand Jury Report:

- SB 378 would require PG&E to compensate customers for losses incurred during PSPS events
- SB 801 requires electrical corporations to deploy backup electrical resources or provide financial assistance to customers receiving a medical baseline allowance if a customer meets specified conditions

- SB 802 would allow a health facility that has received a permit from an air district to operate an emergency backup generator and to use the backup generator during a PSPS event without having that usage count toward any time limitation on actual usage
- SB 431 would require the CPUC, in consultation with the State of California Office of Emergency Services, to develop and implement performance standards, as specified, for all mobile telephony service base transceiver station towers and for all infrastructure for providing mobile telephony service, Voice over Internet Protocol service, Internet Protocol-enabled service, and cable television service that is located within a Commission-designated Tier 2 or Tier 3 High Fire Threat District, or that affects those towers or that infrastructure within such a district

There are also grant opportunities available to counties including:

- State of California, Office of Emergency Services
- Federal Emergency Management Agency Urban Area Security Initiative
- State of California Homeland Security Grant

In 2019 the County received a state grant to provide support to the Office of Emergency Services response to PSPS.

Opportunities for Partnering with PG&E

There have been ten PSPS events in California since the inception of the PG&E program: two in 2018, and eight in 2019. Of these, Contra Costa County experienced two events in 2019. Based on a review of the CPUC-required post-event reports, the Grand Jury identified several areas that invite interface and participation between PG&E and counties, municipalities, and other entities:

- Staffing County Emergency Operations Centers (EOC) by embedding a PG&E liaison or Geographic Information Systems (GIS) expert within the EOC
- Power Support/Outage Mitigation
 - Resilience Zones, which are pre-designated areas where PG&E can provide electricity to a specific area by isolating it from the wider grid and re-energizing it using temporary mobile generation at a pre-installed interconnection hub.
 - Sectionalization, where PG&E can partition and de-energize only portions of each circuit as opposed to a full circuit, in order to reduce the number of customers impacted. In Contra Costa County, the Grand Jury found no

evidence that circuits were sectionalized during the October 9 and October 26 events.

- Temporary Generation Deployment where isolation devices are used to disconnect portions of circuits from the wider grid using mobile transformers temporarily installed at local substations.
- Back-up Power Support for Exceptional Circumstances Impacting Public Safety where PG&E can deploy back-up power support to county sites to respond to public health, safety, environmental risks, first responder emergency operations, or other infrastructure critical to public safety. During the October 26 event, 26 sites were activated in California. The Grand Jury found no evidence that any sites were activated in Contra Costa County.

OCTOBER 9 AND OCTOBER 26 PSPS EVENTS

During the October events, the EOC was activated to respond and coordinate the County response. Observations from these events follow.

Medical

During the October 9 two-day PSPS event, more than 37,000 PG&E customers in Contra Costa County lost power. Of these, more than 1,000 were identified as medical baseline customers. Medical baseline customers are defined by PG&E as those with medical issues who would be impacted by the loss of their service.

During the October 26 five-day event, more than 65,000 PG&E customers in Contra Costa County were affected. Information regarding the number of medical baseline customers was not available to the Grand Jury.

There were communication issues between PG&E and the County, as well as between PG&E and the CPUC, during the October 9 PSPS event about the securing of non-disclosure agreements regarding personal healthcare information of residents considered medically at risk. County access to additional customer information was needed in order to assist local response efforts. As a result, identification of the PG&E medical baseline customers was not integrated with Contra Costa Health Services' information system regarding medically at-risk residents with conditions that could be impacted by the loss of PG&E service. There were data format communication issues between PG&E and the County which resulted in a reduced ability to produce an accurate list of at-risk residents.

The requirement for non-disclosure agreements was ultimately eliminated by PG&E at the direction of the CPUC, and Health Services was able to access the data from PG&E's medical baseline customer database during the October 26 event.

Communications

Based on lessons learned during the October PSPS events, PG&E has stated in the CPUC compliance report that it is working to strengthen coordination with government agencies; in particular, counties and cities in its service area. Its plans include the establishment of a single point of contact for each county and the creation of a dedicated helpline monitored for special requests from counties. PG&E is planning to offer each county a remote or onsite GIS mapping specialist to provide more real-time information and technical support.

Based on the Grand Jury review of the CPUC compliance report, PG&E has listed areas of opportunity to improve their communication with governmental agencies and improve the tracking of real-time information during a PSPS event. They include:

- Planned outage areas
- Current outage areas
- Impacted circuits
- Impacted critical customers (e.g., hospitals, fire stations, law enforcement, and telecommunications)
- Medical baseline customers

Cellular phone providers were impacted by the PSPS events, as well as phone service provided by internet and cable providers. The loss of cellular service was not anticipated by some County departments. Cellular providers experienced a loss of 88 cell sites, which resulted in a 12% reduction of cell coverage in Contra Costa County. This impeded Health Service's ability to contact medically at-risk residents and the ability of residents to contact emergency personnel. The loss of cell coverage also compromised the ability of public safety departments to warn residents during fire evacuations and the ability of first responders to communicate internally via cellular phone regarding plans for such emergency operations as a large-scale evacuation.

Operations

During the second PSPS event, which was three days longer than the first event, departments found their staffing depth was not enough to optimally operate during the event. Both events necessitated an increased use of different County resources which included: staff time, equipment, supplies, and other miscellaneous resources.

Community Resource Centers

Community Resource Centers (CRCs) are locations provided to County residents impacted by a PSPS event. Services include water, restrooms, tables, and chairs, as well as the provision of power for basic charging needs, including mobile and small medical devices. CRCs sponsored and operated by PG&E also provide PSPS event information by dedicated PG&E staff. Other entities, such as cities and organizations, might also establish and operate a non-CRC resource facility.

A CRC meets the following requirements:

- Americans with Disabilities Act (ADA) compliant
- Accommodates up to 100 residents at a time
- Has back-up generator ability
- Open from 8 a.m. to 6 p.m.
- Site owner-approved

PG&E acknowledged in the November 8, 2019 compliance report sent to the CPUC that its CRCs did not adequately meet the needs of the customers who used them for the October 9 PSPS event. PG&E stated that it intends to partner with local agencies to identify where CRCs should be located, to open as many CRCs across impacted service areas as possible, and to post locations and hours on the pge.com website.

PG&E established one CRC within the County during the October 9 event. The CRC was located in San Ramon and was not in close proximity to the areas in the County that were most impacted by the PSPS.

During the October 26 event, PG&E established CRCs in four areas: Brentwood, Richmond, Moraga, and Walnut Creek. Resource facilities were also established and operated by individual cities and organizations such as the American Red Cross. It was not clear to all County departments which services were available at these locations. The interface between some County entities and the resource facility providers was not clearly established. For example, there was confusion regarding sheltering responsibilities between the County and the American Red Cross.

Fiscal and After-Action Report

As of the completion of the Grand Jury investigation, there exists only a preliminary accounting of costs for some County departments. These costs appear to reflect staff time only and do not include costs such as additional equipment and supplies. The Grand Jury did not identify evidence that there is a means for tracking costs specifically incurred by a PSPS event. As of the issuance of this Grand Jury report, the full fiscal impact of the events on the County has not been made available to the Grand Jury.

As of the completion of this investigation, the After-Action Report for the two October PSPS events had not been made available to the Grand Jury. The purpose of an After-Action Report is to analyze the management or response to an incident, exercise, or event by identifying strengths to be maintained and built upon, as well as identifying potential areas of improvement. The Grand Jury's investigation indicates that it is common practice in Contra Costa County to have a debriefing at the end of events such as a PSPS. The debriefing is followed by an After-Action Report.

FINDINGS

- F1. As of the date of this report, the County does not have a comprehensive operational PSPS response Master Plan for County departments.
- F2. Not all County departments have formalized PSPS plans.
- F3. The County Office of Emergency Services has a supporting plan to the Contra Costa County Emergency Operations Plan dated June 16, 2015, that is used for long-term power outages.
- F4. There is no evidence that all County departments have used the County Office of Emergency Services plan as a guide for the development of their departments' specific PSPS plan.
- F5. During the October 9 and 26, 2019 PSPS events, PG&E did not provide the County departments with accurate descriptions of impacted areas in real time.
- F6. With cell, cable, and internet phone service impacted by the loss of power, Health Services could not easily communicate with at-risk residents.
- F7. With cell, cable, and internet phone service impacted by the loss of power, there were communication issues among the staff of public safety departments.
- F8. There were not enough emergency generators pre-positioned for adequate backup to essential County services during the October events.
- F9. During the PSPS event of October 9, 2019, the PG&E Community Resource Center location in San Ramon was not close to areas most impacted by the shutdown. The locations of the Community Resource Centers were improved in the second event on October 26.
- F10. The interface between some County entities and the resource facility providers was not clearly established. Therefore, the County did not have enough information about available services at non-PG&E resource facility locations.
- F11. As of the date of this report, the Grand Jury has found no evidence that the County has a process for tracking its labor costs and other expenses directly associated with a PSPS event.

- F12. As of the date of this report, the Grand Jury has found no evidence that the total fiscal impact of the two October 2019 PSPS events has been provided.
- F13. Grant opportunities for County PSPS support are available through various State and Federal agencies.
- F14. The County may be able to use existing and pending State of California legislation to mitigate negative impacts of a PSPS on the County and its residents.
- F15. As of the date of this report, the County's After-Action Report for the two October 2019 PSPS events has not been made publicly available.

RECOMMENDATIONS

Note: The Grand Jury conducted the majority of its investigations before Contra Costa County and the State of California issued shelter-in-place orders. The Jury recognizes that County departments, agencies, and cities are currently addressing COVID-19 related matters and the Jury has adjusted implementation dates in the recommendations accordingly.

- R1. By December 31, 2020, the Board of Supervisors should consider commencing the development of a unified approach to PSPS events to be used by all County departments which includes: requirements for backup power, communications, Community Resource Center coordination, and training of additional staff to support essential activities.
- R2. By December 31, 2020, the Board of Supervisors should consider directing County departments to develop a list of real-time information to be required of PG&E before initiation and during PSPS events.
- R3. By December 31, 2020, the Board of Supervisors should consider directing Contra Costa Health Services to have a protocol in place for working with PG&E to ensure that CCHS receives the information it requires to notify medical base-line customers of a PSPS event.
- R4. By December 31, 2020, the Board of Supervisors should consider evaluating alternative communication coverage during a PSPS event to address service disruption to cell sites, internet, and cable providers dependent on the PG&E power distribution system.
- R5. The Board of Supervisors should consider directing the County Administrator to establish a means of tracking PSPS costs by December 31, 2020.
- R6. By December 31, 2020, the Board of Supervisors should consider establishing a requirement that a final After-Action Report and a fiscal impact report be completed no later than 60 days after a PSPS event.

- R7. The Board of Supervisors should consider developing a plan to take advantage of funding available for PSPS events from various programs at State and Federal levels by December 31, 2020.
- R8. By December 31, 2020, The Board of Supervisors should consider tracking and communicating to County departments the status of existing and pending legislation which may mitigate the effects of a PSPS event on the County and its residents.

REQUIRED RESPONSES

	Findings	Recommendations
Board of Supervisors	F1 through F15	R1 through R8
Office of the Sheriff	F1 through F5, F7 through F10, F13, F15	

These responses must be provided in the format and by the date set forth in the cover letter that accompanies this report. An electronic copy of these responses in the form of a Word document should be sent by e-mail to ctadmin@contracosta.courts.ca.gov and a hard (paper) copy should be sent to:

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